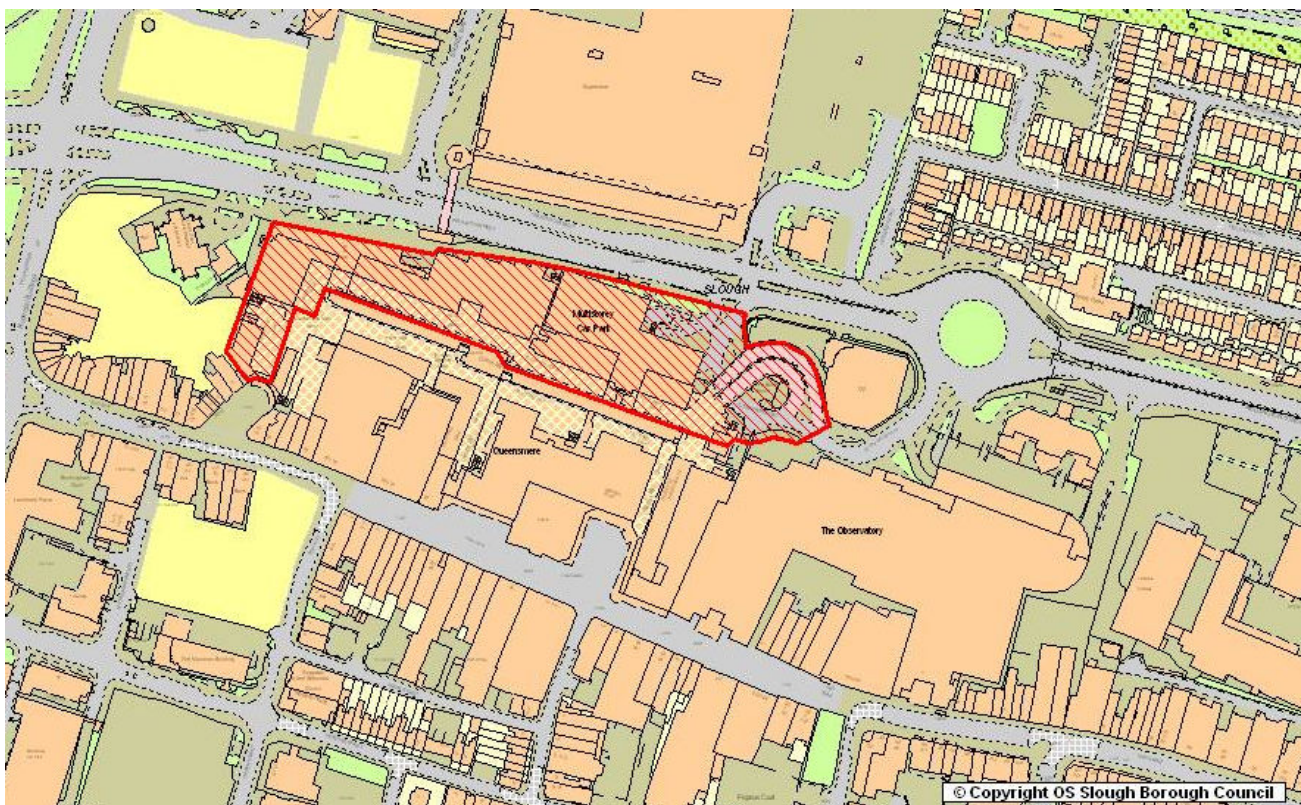


<b>Registration Date:</b>	21-Nov-2012	Applic. No:	P/06684/015
<b>Officer:</b>	Ian Hann	Ward:	Central
		Applic type:	<b>Major</b>
		13 week date:	
<b>Applicant:</b>	Slough Shopping Centre LLP		
<b>Agent:</b>	Mr. John Blackwell, Cunnane Town Planning LLP 67, Strathmore Road, Teddington, Middlesex, TW11 8UH		
<b>Location:</b>	Queensmere Shopping Centre, Wellington Street, Slough, Berkshire, SL1 1LN		
<b>Proposal:</b>	<p>PARTIAL DEMOLITION AND INTERNAL ALTERATIONS/EXTENSIONS TO EXISTING SHOPPING CENTRE AS PART OF A PART NEW BUILD/PART REFURBISHED MIXED USED SCHEME FOR 11, 533 SQ M OF A1 RETAIL, CLASS A3 - A5 FOOD AND DRINK AND CLASS D2 ASSEMBLY AND LEISURE FLOOR SPACE AND 675 RESIDENTIAL UNITS. THE RESIDENTIAL ELEMENT COMPRISING 346 NO. 1 BEDROOM AND 329 NO. 2 BEDROOM BEING CONTAINED WITHIN 4 NO. TOWERS OF BETWEEN 15 AND 23 STOREYS PLUS INFILLING DEVELOPMENT ON TOP OF THE EXISTING SHOPPING CENTRE AND A STAND ALONE TOWER OF 15 STOREYS WITH A VIEWING GALLEY ON TOP. RECONFIGURATION OF EXISTING ACCESS AND FRONTAGES ONTO WELLINGTON STREET AND WORKS INCLUDING, ALTERATIONS AND IMPROVEMENTS TO THE ENTRANCES TO THE SHOPPING CENTRE; PROVISION OF AMENITY SPACE AND LANDSCAPING; VEHICLE AND CYCLE PARKING; REFUSE AND RECYCLING STORAGE; PROVISION OF NEW AND/OR UPGRADING EXISTING INFRASTRUCTURE; GROUNDWORK'S AND RE-PROFILING OF SITE LEVELS; ANCILLARY ENGINEERING AND OTHER OPERATIONS AND PLANT AND MACHINERY.</p>		

**Recommendation:** Delegate to Planning Manager



## **1.0 SUMMARY OF RECOMMENDATION**

- 1.1 Having considered the relevant policies below and the information provided by the applicant, officers are of the view that the development is considered to result in economic, environmental and social improvements to Slough Town Centre and the wider area. It is therefore recommended that the application is delegated to the Planning Manager for the consideration of any outstanding consultation responses, minor design changes, completion of Section 106 Agreement, finalising conditions and final determination.
- 1.2 This application has been referred back to the Planning Committee for decision, following its earlier consideration of design issues during the meetings held on 28<sup>th</sup> November 2013 and 9<sup>th</sup> January 2014.

## **PART A: BACKGROUND**

### **2.0 Application Site**

- 2.1 The subject of this application is an area that consists of two shopping centres The Queensmere and The Observatory which are spread over circa 54,000 square metres and consist of 124 retail outlets, restaurants and cafes, plus a ten screen cinema and a health and fitness club. The centres are situated approximately five minutes' walk to the south of Slough railway station and bus station. The main landmark between the station and the site is the large Tesco Extra which is situated to the north of the site.
- 2.2 The application site covers an area of approximately 3.51 hectares between High Street and Wellington Street, Slough and is located within the Town Centre Area and Town Centre Shopping Centre as defined in the Proposals Map adopted in the Slough Local Development Framework Site Allocations Development Plan Document 2010 for the Slough Local Plan 2004. The Application site also an allocated site within the Slough Local Development Framework, Site Allocation Development Plan Document November 2010 (SSA14). The site currently has 37,000M<sup>2</sup> of retail floor space and 7,300m<sup>2</sup> of office floor space, although planning permission has been granted to convert the majority of the office space (Wellington House) into flats.
- 2.3 The proposals are centred around the northern side of the Queensmere Centre facing onto Wellington Street returning along the pathway between the application site and Our Lady Immaculate and St. Ethelbert Church. This area of the site which is the subject of this application has retail units, including the old Woolworths unit, toilets and entrances into the shopping centre at ground floor level with multi-storey car parking levels above. The entrance to the car park is also accessible from this side of the shopping centre.
- 2.4 The site is located between Wellington Street to the north with Tesco Superstore beyond and the railway and bus stations further to the north. The High Street is to the south of which the western part of which is defined as the Slough Old Town Area, with residential properties further to the south. The area to the west of the supermarket is to be developed as an office development and is part of the Heart of Slough development. To the west of the application site is St Ethelbert Church which is a grade II Listed Building. To the area immediately to the south of the church a new library, cultural and community building, "The Curve", is being built.

### **3.0 Proposal**

- 3.1 This application seeks permission for the partial redevelopment of the Queensmere Shopping Centre to create and enhance the retail offer with a new frontage, including retail units and improved pedestrian entrance onto Wellington Street and the provision of

residential units above the centre with their own amenity space, to provide a landmark development. The scheme is intended to support the Heart of Slough development, reinvigorate the town centre area of Slough and act as a catalyst for further development.

- 3.2 In terms of the commercial elements of the proposals this application seeks to add the following additional floor space:
- 5,999m<sup>2</sup> retail use
  - 1,1387m<sup>2</sup> assembly / leisure use
- 3.3 The changes to the shopping centre involve the creation of 6 large retail units, 3 of which will have first floor elements and 3 accessed directly from Wellington Street. There will be another 2 entrances to the centre from Wellington Street that will access the mall directly. The façade of the shopping centre facing onto Wellington Street will be redesigned so that the retail units facing onto Wellington Street will have window displays replacing the existing blank and uninviting elevations, which act as a barrier to the High Street from the north of the site.
- 3.3 The proposals also see the western side of the shopping centre redesigned so that an additional larger retail unit will be located close to the Mackenzie Mall entrance to the centre and 2no. Units created for café, restaurant and takeaway uses. An additional entrance into the shopping centre will be relocated on this elevation of the building. The toilets in this location have been moved into the shopping centre under a previous planning permission for enabling works to the Curve building.
- 3.4 The public realm will be improved including paving, street furniture and planting to provide a pleasant connection between the shopping centre and the Curve building. In addition a new publicly accessible viewing gallery has been provided for in the top floor of the stand-alone residential tower to the west. That will be served via an external lift and supported by a commercial use, such as a bar or restaurant.
- 3.5 The other main element of this application sees the provision of 675 flats with the accommodation broken down as follows:
- 346 X 1 bedroom flats
  - 329 X 2 bedroom flats
- 3.6 These residential units would be provided over 4 towers above the existing shopping centre, with additional development returning along the western side of the building. A stand alone tower is also proposed to the east of the shopping centre. It is proposed that the top level of this tower will be served via an external lift and can act as a publicly accessible viewing gallery or other commercial use, such as a bar or restaurant. The 2<sup>nd</sup> and 4<sup>th</sup> floors of the development would see leisure facilities provided for the occupiers of the flats. The towers will range between 18 storeys and 23 storeys in height measuring between 61.1m and 79.8m above pavement level in Wellington Street. Each tower will be accessed from their own entrances from Wellington Street and opposite the Church. The towers above the shopping centre will be slightly curved and will have silver composite cladding with external glass balconies while the stand alone circular tower will be clad in glass with featured coloured glass fins and recessed balconies punched into the building.
- 3.7 The existing parking arrangement will be rearranged to the same level of parking of 1,415 spaces over both shopping centres with the Queensmere spaces being over 4 floors accessed from the existing ramp into first floor level. Five spaces will be for disabled users and four for the car club.
- 3.8 Car parking spaces will be provided for 15% of the residential properties totalling 102

spaces and will be located in the Observatory car park where they can be clearly segregated to avoid confusion with normal unallocated bays. Storage will be provided for cycles for residential and commercial use.

- 3.9 The development will be served from the existing service area which will be accessed from the same vehicle ramp as that for the car park although some works will be undertaken to ensure two way traffic and a separation of cars and service vehicles
- 3.10 As well as the development making changes to the actual shopping centre the application will also see changes to the public realm along Wellington Street with additional paving and planting.
- 3.11 Any permission would be built over 3 phases as follows-
- Phase 1 – stand alone tower and western end of the shopping centre 276 units,
  - Phase 2 – one tower in the middle of the site 117 units
  - Phase 3 – eastern part of the shopping centre 282 units
- 3.12 The scheme has been amended since the original submission which was originally for 908 flats in the same number of towers, which were to be finished in a painted render but with additional development between the towers. The proposal was referred to the Berkshire Design Panel, who accepted the height parameters of the scheme, but was highly critical of design, finish and layout. A further amended scheme was then submitted which provided the current form and appearance of development. This application came to planning committee and following the comments made by members the internal layout of the shopping centre was changed so that views through the centre were available from the Mackenzie Square entrance.
- 3.13 The following documents have been submitted along with this planning application:
- Application Form
  - Plans (amended)
  - Environmental Impact Assessment & Appendices (amended)
  - Design & Access Statement (amended)
  - Townscape Impact Assessment (amended)
  - Visual Impact Assessment (amended)
  - Heritage Impact Assessment (amended)
  - Planning Statement and Retail Assessment (amended)
  - Parking Survey Report
  - Transportation Assessment & Appendices (amended)
  - Residential / Workplace Travel Plan Framework (amended)
  - Servicing Management Plan (amended)
  - Site Waste Management Plan (amended)
  - Flood Risk Assessment
  - Daylight / Sunlight / Overshadowing Report
  - Air Quality Assessment
  - Noise Assessment (amended)
  - Contaminated Land Risk Assessment
  - Statement of Consultation
  - Utility Statement (amended)
  - Sustainability Statement
  - Energy Statement

#### **4.0 Planning Background**

- 4.1 There have been aspirations for some years to achieve a radical comprehensive development of key sites within Slough in a way that would deliver significant change to the infrastructure and appearance of the area. Recognition that the town centre was not fulfilling its full potential as a community and leisure area was reflected in Slough's Millennium project in 1995. The *Local Plan For Slough, 2004* also recognised the inadequacy of the town centre and the potential for its redevelopment.
- 4.2 The perceived problems within the town centre included:
- Substantial areas of land are dominated by public highway, including the wasted area of the sunken A4/William Street roundabout;
  - Severing effect of the A4, with pedestrians forced to use subways and cyclists not catered for in a safe manner;
  - Lack of focus and identity or sense of entering the Town Centre;
  - Poor architecture and lack of landmark buildings at one of Slough's principle gateways;
  - Poor pedestrian and cycle links between the railway station and town centre/shopping centre;
  - Bleak unwelcoming environment outside Slough Station, with muddled usage patterns on forecourt areas;
  - Poor unwelcoming environment in the Bus Station and at bus stops outside the Queensmere shopping centre; and
  - Lack of integrated rail/bus/transport interchange.
- 4.3 As a result the Council and its partners have promoted the "Heart of Slough" comprehensive regeneration scheme in order to alleviate the problems identified above and regenerate Slough Town Centre and have started to be implemented with the highway changes along Wellington Street and creation of the new bus station. The next phase in this scheme is the construction of the Curve building to act as a new library, education facilities for adults, a café and a cultural centre for the town and work has commenced on this building. The proposals which are the subject of this application are designed to supplement and support the wider Heart of Slough Project.
- 4.4 The Council have now established a 'Changing Views' task group to improve the quality, facilities and image of the centre of the town. These proposals have formed part of the discussions with regards to the regeneration of the Town Centre.
- 4.5 In order to inform the Core Strategy which was adopted in December 2008, the Council commissioned a Retail Assessment from Colliers CRE in January 2007 which considered the current and future role of the town centre. This concluded that Slough town centre is experiencing a significant leakage of retail expenditure to competing centres, retaining just 30% of market share of comparison goods expenditure within the defined core catchment area. This loss of market share and the associated decline in goods sales and shopper population is forecast to continue in the absence of an additional and improved retail offer within the town centre.
- 4.6 Following on from this report the Core Strategy identified the need to improve the range and attractiveness of Slough's retail offer to consumers and sought to positively enhance the role of the town centre by ensuring that all new major retail and leisure facilities are located within it. The redevelopment and reconfiguration of the Queensmere and Observatory shopping centres are therefore pivotal in achieving this and improving the competitiveness of Slough Town Centre to provide for its catchment area and complement the offer of other centres.
- 4.7 The Slough Local Development Framework Site Allocations Development Plan Document in November 2010 (site reference SSA14) allocated the broader site that includes this proposal area for the following reasons :
- to establish the principles for comprehensive redevelopment or reconfiguration of the Queensmere and Observatory shopping centres

- to ensure the future development of the shopping centres positively contributes to the wider regeneration proposals for the town centre, particularly the heart of Slough
- to support development proposals that will encourage further retail investment in the town centre.

The background for the site allocation highlights the Queensmere and Observatory are located in the centre of the town, and that the amount of retail space could be increased and enhanced. It goes on to state, “the refurbishment and reconfiguration of this site is also central to the wider regeneration of Slough Town Centre... The proposals will be expected to build on the town centre 'Art at the centre' initiative and Heart of Slough proposals”.

4.8 The Site Allocation DPD also acknowledged some of the constraints of the current layout of the site closes off the historic north-south routes from Mackenzie Street to the High Street and urban by-pass appearance of the Wellington Street for pedestrians and cyclists

4.9 The site allocation document therefore considered that redevelopment or reconfiguration proposals should have the following:

- Create a internal pedestrian link between the Queensmere and Observatory shopping centres
- Improve the retail and leisure offer around the Town Square through change of use of key units and improved retail offering
- Link to the Heart of Slough through provision of a western entrance to the shopping centre, and access to residential units above the centre
- Create active frontages along the A4 Wellington Street and St Ethelbert's Church frontage
- Remove the service ramp to the Prudential yard in coordination with the Heart of Slough proposals for the area
- Improve pedestrian links to the bus and train stations via Wellington Street
- Rationalise multi-storey car parking provision and its links to the centres and Wellington House
- Redevelop the western end of the Queensmere Centre adjacent to St Ethelbert's church, including improved retail units, residential accommodation above the centre and removal of the toilet block
- Transform the Wellington Street frontage to create an urban boulevard with tree planting, improved north-south route connection to the town centre, active retail frontages and access to residential accommodation above the retail units
- Aim to reduce the negative impacts of construction upon existing businesses and on the quality of life for residents and users of the town centre by appropriate phasing and implementation.

4.10 A Development Brief was produced in 2007, in which the Council is broadly supportive of the key proposals including the comprehensive redevelopment and reconfiguration of the shopping centres incorporated an element of high density residential development into the scheme. The brief indicates four phases/parts to the development:

- Part 1 – redevelopment of Queensmere multi storey car park, new retail, basement parking and residential units above
- Part 2 – redevelopment of western end of Queensmere centre of new retail and residential above
- Part 3 – Design solution for Wellington Street frontage and design code for soft and hard landscaping
- Part 4 – Proposal for vehicular connection between Wellington House and Observatory car park.



- 4.11 Two broad locations for new build are identified. The first being redevelopment of the existing multi storey car park and retail below, taking the form of two residential blocks above replacement extended and improved retail space.. One of the towers would be 12 storeys above the retail equating to a total height of 15 storeys. The other would be 8 – 10 storeys above the retail, equating to a height of 11 – 13 storeys. A lower connecting residential block 6 -7 storeys above the amenity deck is also proposed. The vertical emphasis created by these blocks would balance the current horizontal emphasis onto Wellington Street.
- 4.12 The second location is above Queensmere shopping centre adjacent to Prudential Yard and the listed church. Retail will be provided at ground and mezzanine levels with a frontage to Wellington Street. Residential development above will be at a height of 8 – 9 storeys above the retail stepping down to 4.5 storeys above ground floor adjacent to the listed church.
- 4.13 Wellington Street would be enhanced through a use of modern and robust hard and soft landscaping in accordance with a design code.
- 4.14 The Council is therefore supportive of the principle of the comprehensive phased redevelopment of the shopping centres including and supported by residential development.
- 4.15 The design brief was then used as a basis for a planning application which was considered by Planning Committee on 15<sup>th</sup> January 2008 reference P/06684/013 for the following scheme:
- “Demolition of part of the Queensmere shopping centre and redevelopment to provide 3,019 sq metres of Class A1 retail floorspace together with associated alterations to pedestrian access arrangements to the shopping centre and demolition and redevelopment of existing service road with construction of a roof above”.*
- 4.16 This application was subsequently approved after being delegated back to officers to finalise a Section 106 Agreement in November 2008. This permission has now expired.
- 4.17 Prior to this the last planning permission for the extension of the shopping centre was in July 1997 when planning permission was granted for the following (reference P/06684/008):
- REFURBISHMENT AND EXTENSION TO EXISTING SHOPPING CENTRE  
COMPRISING: (1) INFILLING OF THE GROUND FLOOR AREA BETWEEN THE CINEMA COMPLEX AND EXISTING RETAIL UNITS ADJOINING TOWN SQUARE TOGETHER WITH CHANGE OF USE OF PART OF EXISTING PROPERTY FOR RETAIL (A1) AND/OR RESTAURANT (A3) PURPOSES; (2) ERECTION OF SINGLE STOREY SHOP UNIT ADJOINING CINEMA AND OTHER GROUND FLOOR EXTENSIONS; (3) ALTERATIONS TO EXTERNAL APPEARANCE AND ENTRANCES; (4) REPAVING TOWN SQUARE, MCKENZIE STREET AND PARTS OF THE HIGH STREET (5) REMOVAL OF PLANTERS IN TOWN SQUARE AND CERTAIN PLANTERS ON THE HIGH STREET; (6) REMOVAL OF FOUNTAIN AND PUMPS IN MCKENZIE STREET
- 4.18 All other planning history relates to signage and small scale alterations to the shopping centre.
- 4.19 Wellington House is the office building which occupies part of the site. Planning permission was granted for the conversion of part of the building known as the annex into residential accommodation in December 2010 (reference P/03167/020) and has been carried out.

4.20 Planning permission was then refused for the conversion of one of the floors of the main office building into residential accommodation in October 2011 (reference P/03167/021). This refusal was appealed when it was dismissed in November 2012 due to the impact on the future occupiers in terms of lack of sunlight, daylight and outlook.

4.21 The following application was approved in July 2013 (P/11826/005)

CHANGE OF USE OF PART 1ST FLOOR FROM CLASS B1 (A) OFFICE TO CLASS C3, CHANGE OF USE OF 2ND FLOOR FROM CLASS B1(A) OFFICE/CLASS D1 NON RESIDENTIAL EDUCATION CLASS C3 RESIDENTIAL AND CHANGE OF USE OF 3RD TO 5TH FLOORS FROM B1(A) OFFICE TO CLASS C3 RESIDENTIAL. ERECTION OF A 6TH FLOOR FOR CLASS C3 RESIDENTIAL USE TO CREATE A SEVEN STOREY BUILDING CONTAINING A TOTAL OF 100 FLATS, COMPRISING, 2 NO. STUDIO FLATS, 76 NO. X ONE BED FLATS AND 22 NO. X TWO BED FLATS. PROVISION OF CYCLE AND BIN STORES ON REAR SERVICE DECK AND ROOF TOP COMMUNAL GARDEN.

## **5.0 Consultations**

*See Appendix A*

## **6.0 Neighbour Notification**

6.1 The following neighbours have been consulted with regards to this application:

Queensmere : 1 -122  
High Street : 16 to 339  
The Observatory : 1-46b  
Brunel Way : Tesco Stores Ltd and Occupiers Thames Trains  
Mackenzie Street : 1-9a  
Windsor Road : 1-51  
Beechwood Gardens : 1-99  
Osborne Street : Stephenson Court, Richard Dodd Place  
Victoria Street : 2-107  
Park Street : 4-77 inc Bishops Copurt, Spruce Court and Bembridge Court  
Alpha Street North : 2-51b,  
Alpha Street South : 44-75  
Hencroft Street North : 1-55,  
Hencroft Street South : 34, 59,  
Herschel Street : 1-58  
Church Street, : 1 – 77 inc Buttler House  
Chalvey Park : 2-18  
Burlington Road : Look Ahead, Burlington Court, Ibex House  
Burlington Avenue : 1-3  
William Street : Prudential Buildings  
New Square : 2-30  
Moorstown Court : 1-23  
Chapel Street : 9-10  
Buckingham Gardens : Brisbane Court  
Bronte Close : 1-40  
Grays Place: 31-75 inc The Junction, Automotive House and Roman House.  
Mill Street : 64, Noble Court, Fundary Court, Headington Place  
Stranraer Gardens : 38-47  
Stoke Gardens : 10, 1-5 Brostol Way  
Stoke Road : 1-25  
Wellesley Road : 15-80  
Wellesley Road : 2-106



Wellesley Path : 201/215  
 Wexham Road: 2-44 inc Milford Court and Neo Apartments.  
 Rye Court : 1-12  
 Stratfield Road : 1-133 inc Duncansby House  
 Merton Road : 1-11  
 The Grove : 6-12 inc Amazon and Pechiney House  
 Richmond Crescent : 1-72  
 Wellington Street : 100  
 Leith close : 1-60  
 Whittenham Close : 1-15 Slough Interchange Industrial Estate  
 Albion Close : Sun Chemical and Manrose Manufacturing  
 Petersfield Avenue : Lion House

6.2 There has been three letters received as a response of the neighbour consultation raising the following issues:

- High rise buildings in the centre; the heart of Slough, is an over-development and is a backwards step.  
The five high rise buildings will be the tallest in the town and will completely overshadow St. Ethelbert's and the attractive Curve. The plans are not in keeping with its surroundings and are completely out of scale with all surrounding buildings.
- An additional 900 dwellings will significantly increase demand on amenities. There is no mention in the plans of how the demands of new residents will be accommodated. The plans do not seem to take into account the quality of life for these residents and the proposals will create a sink estate in the town centre that will make the high street a no go area and leave us in a worse position that we are today.
- If there are to be 908 residential units will sufficient parking be provided. Assuming that each is inhabited with a couple then there will need to be at least 1800 extra spaces provided as nowadays most couples have 2 cars.
- Where will the exit to the new parking facility be? Will it be the A4? This is busy at the best of times, what with Tesco's and the new road layout and if the exit is here it will only lead to more congestion.
- Do the blocks have to be so high? They will only provide an eyesore similar to those in parts of London where it is now accepted that high rise blocks of this type are not the solution and hence why many are being demolished.
- Will extra recreation areas be provided for children living in the new apartments? Currently there is nothing close by for them – will we just get more & more children roaming the streets / shopping centres.
- The whole place is an eye sore and should be done correctly to bring it in to the 21<sup>st</sup> century or not done at all. Slough has a big chance to change its image with a real complete overhaul with landscaped pedestrian areas grass/ trees and new shops
- If the focus is to build 5 large flats which is just an eye sore then we need to think again. Cross Rail comes in 2018 which could make slough a huge investment potential, we really must get this right or we will lose this massive potential to put slough on the map

These matters are discussed in the report below.

- The consultation by Criterion has been woeful. Their application only includes comments from the stand they had in the underused shopping centre over two days and a handful of comments from some leaflets. This limited consultation resulted in 135 comments – this is not representative of a town of over 200,000 residents. Looking in the application, there are no comments included from the online consultation portal. The consultation part of the application is clearly incomplete and inadequate.

- While legislation currently states that developers undertaking major applications should engage in pre application consultations with the public and the Localism Act 2011 states that consultation should be genuine, responsive and demonstrable but does not stipulate how such a consultation should be done. Therefore although considered by some to be inadequate a consultation exercise has been undertaken and complies with the Localism Act 2011. This however did not inhibit the consultation undertaken by the council as part of their duty under the Planning Act where a full and comprehensive consultation exercise was undertaken, as documented above.

6.3 A petition has been received with the following citation:

*"We call on Slough Council's planning committee to REFUSE permission for the development of five high rise residential flats (9 - 21 storeys in height) on the high street on the following grounds: a) it would have a significant detrimental impact on the visual amenity in the centre of Slough b) the density of accommodation would create huge stresses on community facilities such as schools and health provision; and c) the proposals are an overdevelopment which adversely affect the urban environment around the town centre, making it harder to bring business to the high street."*

This petition has been signed by 72 people (5 of which are anonymous) but no addresses are given so it is not possible to verify where the people who sign the petition live.

6.4 A representation has been received from Barclays Bank who wants no harm caused to their presence in the shopping centre as a result of these proposals and have agreed a better frontage and visibility so to better integrate Barclays into the proposed scheme and support the principle of the proposed development to support the socio – economic regeneration of Slough.

## **PART B: PLANNING APPRAISAL**

### **7.0 Policy Background**

7.1 The application will be assessed against the following policies:

#### **The National Planning Policy Framework (NPPF)**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise. Annex 1 to the National Planning Policy Framework advises that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

The Local Planning Authority has published a self assessment of the Consistency of the Slough Local Development Plan with the National Planning Policy Framework using the PAS NPPF Checklist.

The detailed Self Assessment undertaken identifies that the above policies are generally in conformity with the National Planning Policy Framework. The policies that form the Slough Local Development Plan are to be applied in conjunction with a statement of intent with regard to the presumption in favour of sustainable development.

It was agreed at Planning Committee in October 2012 that it was not necessary to carry out a full scale review of Slough's Development Plan at present, and that instead the parts of the current adopted Development Plan for Slough should all be republished in a single 'Composite Development Plan' for Slough. The Planning Committee endorsed the use of this Composite Local Plan for Slough in July 2013.

## **7.2 Slough Local Development Framework Core Strategy (2006– 2026) Development Plan Document December 2008**

Core Policy 1 (Spatial Planning Strategy),  
Core Policy 3 (Housing Distribution),  
Core Policy 4 (Type of Housing),  
Core Policy 5 (Employment)  
Core Policy 6 (Retail, leisure & Community Facilities)  
Core Policy 7 (Transport)  
Core Policy 8 (Sustainability and the environment)  
Core Policy 9 (Natural, built and historic environment)  
Core Policy 10 (Infrastructure)  
Core Policy 11 (Community safety)

## **7.3 Adopted Local Plan for Slough 2004**

Policy H7 (Town Centre Housing)  
Policy H14 (Amenity Space)  
Policy S1 (Retail Hierarchy)  
Policy S8 (Primary and Secondary Frontages)  
Policy EN1 (Standard of Design)  
Policy EN3 (Landscaping Requirements)  
Policy EN5 (Design and Crime Prevention)  
Policy T2 (Parking Restraint)

## **7.4 Adopted Site Allocations Development Plan Document 2006-2026**

Policy 1 Site Specific Allocations (SSA 14 Queensmere and Observatory Shopping Centres)  
Proposals Map Policy 1

## **7.5 The main planning considerations are considered to be:**

- Principle of development
- Design
- Impact on surrounding area including listed buildings
- Relationship to Heart of Slough
- Living conditions for future occupiers
- Transport and parking
- Sustainability / environmental issues
- Financial contributions
- Delivery of Site Specific Allocation 14 Site Planning Requirements

## **8.0 Principle of development**

8.1 The site is identified on the Local Development Framework Proposals map as within the Town Centre Shopping Centre and Town Centre area. Policy S8 (Primary and Secondary Frontages) of the Local Plan for Slough (2004) identifies the Queensmere and Observatory as Primary Shopping Frontages in Slough Town Centre. The site also covers approximately 50% of Site Allocation SSA 14 of the Site Allocations DPD. These identify the uses proposed are acceptable in this location.

8.2 The proposed development is expected to build on the Heart of Slough Proposals, and the

redevelopment of the Queensmere and Observatory Shopping Centres was identified in the Heart of Slough Development Brief in April 2007. The proposals also help deliver the Councils 'Changing Views' strategy promoted in the Corporate 5 Year Plan through providing a draw to the town centre and new residents for it. For example i) the new and reconfigured retail will stabilise the current retail offer, ii) the viewing tower will add an interesting leisure destination iii) the combination of new retail, food and drink provision will improve the attraction of the Centre to the residential and commercial population within cycling and walking distance and beyond, iv) The addition of a new community (including in penthouses) will help deliver a return to positive town centre living, v) The high quality buildings and 'Heart Of Slough' design standard public realm will add positively to the atmosphere and image of the town centre, including the elements visible for those travelling through on A4 or the rail line, The 'Changing Views' strategy will inform the new Local Plan policies for the town centre and its environs.

- 8.3 The principles of the proposals are compatible with the Core Strategy Core Policy 1 (Spatial Strategy) which states that high density housing development and intensive trip generating uses including retail and leisure should be located in Slough town centre. The negotiations have secured a commitment to high quality internal residential fit out and external finish that will improve the quality and feeling in the area for new and existing residential and business communities. This will also add to the improvements delivered by Heart of Slough and Art at the Centre.
- 8.4 Core Policies 3 (Housing distribution) identifies the town centre as an appropriate location for housing, and Core Policy 4 (Type of Housing) directs high density housing to Slough Town Centre. The units will be 'Private Rented' which will introduce a new and in demand tenure to the town centre.
- 8.5 The viability of the mixed use scheme rests on the residential element coming forward but all elements are required to bring forward the social and economic benefits of the development, so negotiations and a S106 have been used to appropriately phase and mitigate the development.
- 8.6 The details of the proposal are compatible with the Site Allocations DPD SSA14 Site Planning Requirements which state: "Redevelopment and/or reconfiguration proposals should:
- Create an internal pedestrian link between the Queensmere and Observatory Shopping Centres.
  - Improve the retail and leisure offer around the Town Square through change of use of key units and improved retail offering.
  - Link to the Heart of Slough through the provision of a western entrance to the shopping centre, and access to residential units above the centre.
  - Create active frontages along the A4 Wellington Street and St Ethelbert's Church frontage
  - Remove the service ramp to the Prudential Yard in coordination with the Heart of Slough proposals for the area
  - Improve pedestrian links to the bus and train stations via Wellington Street
  - Rationalise multi-storey car parking provision and its links to the centres and Wellington House
  - Redevelop the western end of the Queensmere Centre adjacent to St Ethelbert's church, including improved retail units, residential accommodation above the centre

and removal of the toilet block.

- Transform the Wellington Street frontage to create an urban boulevard with tree planting, improved north-south route connection to the town centre, active retail frontages and access to residential accommodation above the retail units.
- Aim to reduce the negative impacts of construction upon existing businesses and on the quality of life for residents and users of the town centre by appropriate phasing and implementation.

8.7 Paragraph 1.5 of Slough Site Allocations DPD states that *“the council will in principle support any development or use of land that is in accordance with the use proposed for it. In practice this means that a planning application that complies with the Site Planning Requirements, policies within the Development Plan and other regional and national guidance as appropriate, will be approved unless the details of the scheme are unacceptable or there are other material considerations that indicate otherwise”*

8.8 The principle of the redevelopment of the Queensmere and Observatory Shopping Centre to present a high density mixed use scheme, which complements the town centre, is supported through the Slough Site Allocations DPD. Also the principle of the proposal was agreed at Planning Committee in September 2009.

8.9 Retail

There have been revised proposals for the retail element since August 2007. The current application proposes a reconfiguration of the retail facade so that the retail face of the Queensmere centre is redefined, and new larger units are integrated into the western end.

8.10 The current proposals are compliant with Core Policy 6 (Retail, leisure and Community Facilities), which states that all new major retail, leisure and community developments will be located in the shopping area of the Slough Town Centre in order to improve the town's image and to assist in enhancing its attractiveness as a Primary Regional Shopping Centre. The proposal for more retail and improved and larger retail formats delivers the change to the quality and scale of the shopping centre established in the Core Strategy 2006-2006 DPD (2008), and is in compliance with Core Policy 6 (Retail, Leisure and Community Facilities) and National Planning Policy Framework (NPPF) which supports sustainable economic development to deliver the homes, business and industrial units.

8.11 This proposal for the comprehensive redevelopment and reconfiguration of the shopping centres will have a positive impact on the vitality and viability of Slough Town Centre, and is therefore supported. The Centre of Slough will benefit from the investment to improve the retail experience in the Queensmere which should also attract new tenants.

8.12 The Retail Assessment (2007) commissioned by Colliers CRE on behalf of Slough Borough Council (2007) identified that Slough is leaking expenditure to nearby town centres and concludes that the town suffers from fierce competition in the local market for shopping expenditure and that the quality of Slough's retail offer is comparatively poor and in need of improvement.. The principle of improving the quality and scale of the shopping centre in response was established in the Core Strategy 2006-2026 DPD (2008). This was then implemented through the identification of the Queensmere and Observatory Shopping Centre in the Site Allocations DPD (2010) as a key site for regeneration. Slough Core Strategy 2006-2026 DPD states that the town centre is likely to slip down the ranking of shopping centres unless there are significant improvements to its attractiveness (Paragraph 2.25). As retail provision and the role of town centres has changed dramatically with the arrival of internet shopping and the economic downturn mixed use redevelopment of the Centre will contribute to delivering the Core Strategy Spatial Strategy and Core

Policy 6 to promote and optimise the Town Centre.

- 8.13 Heart of Slough infrastructure works have improved pedestrian and cycle access across Wellington Street, but the entrances and access to the shopping centres and high street remain in need of improvement. The redesign to create a street frontage with more activity on Wellington Street will begin to remedy this. Signposting the shopping centre and providing a gateway to the town from the A4 Bath Road and the main route from the train station. This is in conformity with the site planning requirements set out in the Site Allocations DPD (November 2010). Improving the retail façade and additional retail floorspace will also provide the opportunity to improve the retail offer and attract more footfall to the shopping centre improving its vitality and viability.
- 8.14 The applicant has already altered the internal layout of the Queensmere and Observatory to create a link between the two, which has achieved the Site Allocation's Requirement to increase permeability.
- 8.15 Impact assessment and sequential test
- Core Policy 6 (Retail, Leisure and Community Facilities) states that out of centre and edge of centre retail developments will be subject to the sequential test.
- 8.16 The proposal is located in a town centre location. Hence Slough Core Strategy 2006-2026 DPD and the National Planning Policy Framework (NPPF) do not require an assessment of need, impact or sequential approach to site selection.
- 8.17 The planning and retail study submitted by the applicant provides an assessment of the likely effects of the proposal. Work was updated to provide a baseline position and identify trends or patterns. The applicant then have forecasted the patterns of expenditure under 'without proposal' and 'with proposal' scenarios in order to examine the effect on Slough of the application proposal being completed. New retail offer completion from other centres. A do nothing approach would potentially see the centre fall in to decline this will provide a boost to the town centre.
- 8.18 The assessment shows that the both centre fail to capture available expenditure from all of the sub area but particularly the tertiary and quaternary. The remaining expenditure is been spent at other centre therefore there is leakage of spend. The negative impact is that the health of the centre could decline with increased retail vacancy rates.
- 8.19 The outcomes of the assessment state that the impact of the proposal in quantitative terms is forecasted to build share for the centre and claw back trade from the competing centres. This is a positive outcome and this will improve the competitiveness of Slough Town Centre as a retail destination over other competing centres.
- 8.20 Residential
- Proposals for the residential element have been revised over the years from August 2007 to August 2011. The design and number of residential units has fluctuated over the years. In August 2007 it was 474 residential units, 1109 in January 2010 and 944 in August 2011. A part of the current proposal is to develop 675 residential units above the Queensmere shopping centre.
- 8.21 Past Annual Monitoring Reports (AMR) have recorded projected housing units to be delivered on site lower than stated in past proposals. Housing trajectories in the December 2007-08 AMR recorded 250 units and in each AMR from December 2008-2011 500 units were recorded in December AMR 2011-12 The Strategic Housing Land Availability (SHLAA) (2010) identified that the Queensmere and Observatory would deliver 250 units which is in line with the figures recorded in the Annual Monitoring Reports. These figures

show that we did not endorse this high number of units on the site. The maximum units we have endorsed are 500 units in the housing trajectory in the latest AMR. Therefore we are not reliant on the 675 units been delivered to meet our housing target.

- 8.22 Core Policy 3 (Housing Distribution) states that a minimum of 6,250 dwellings will be provided in Slough between 2006 and 2026. There will be a minimum of 3,000 dwellings in the Town Centre. As stated above we have no objection in principle to the development of flats in Slough Town Centre which will provide a new resident population. The principle of residential above the shopping centres was established through the Core Strategy 2006-2026 DPD and the Site Allocations DPD.
- 8.23 There is high housing need in Slough and these units will contribute to the housing supply. However we need to ensure that these are built to a high standard of quality and design. This is in line with National Planning Policy Framework (NPPF) which states that there is a need to deliver a wide choice of high quality homes.
- 8.25 The latest Annual Monitoring Report 2011-12 (AMR) identifies that Slough has a 5, 10, 15 year housing supply. Slough is therefore on target to meet the housing allocation before the end of the plan period and not reliant on these 675 units being implemented. The housing trajectory in the AMR 11-12 reports that the Queensmere and Observatory shopping centre will provide 500 units. It is acknowledged that these flats will contribute to Slough housing supply but the local planning authority is not willing to relax policies on design, housing mix and affordable housing to accommodate 625 new residential units.

## **9.0 Design**

- 9.1 The National Planning Policy Framework confirms the following:

*“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people” (para 56).*

*“Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment” (Para61).*

*“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions” (Para 64).*

*“Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits.” (Para 65).*

- 9.2 Core Policy 8 of the Core Strategy requires that, in terms of design, all development:
- a) Be of high quality design that is practical, attractive, safe, accessible and adaptable;
  - b) Respect its location and surroundings;
  - c) Provide appropriate public space, amenity space and landscaping as an integral part of the design; and
  - d) Be in accordance with the Spatial Strategy in terms of its height, scale, massing and architectural style.
- 9.3 Policy EN1 of the adopted Local Plan states that development proposals are required to



reflect a high standard of design and must be compatible with and/ or improve their surroundings in terms of scale, height, massing/ bulk, layout, siting, building form and design, architectural style, materials, access points and servicing, visual impact, relationship to nearby properties, relationship to mature trees; and relationship to watercourses.

9.4 The original proposal that formed this application for the larger development, with coloured render finish, was referred to the Berkshire Design Panel in December 2012. The Berkshire Design Panel is an independent panel who assess and comments on major schemes such as the one proposed. The use of such panels is encouraged in the National Planning Policy Framework.

9.5 With regards to the design and layout of the proposals the design panel had the following comments to make:

*“While the overall height of the proposed development did not concern the panel, there is little evidence that the scheme is responding to a coherent approach to composing the towers on the site; how they respond to each other in terms of proximity and relationships to the medium and longer range views. For such a significant development which is considerably higher than the surrounding development we feel that this clear strategy is required. The development is very large and complex in its levels and the interrelationship of different elements and uses....This will not be the only tall building in the area and the proposed development will have to work alongside its emerging context. The development should be matched with a clear vision as to how it responds to the town centre. We note the urban design analysis that has been undertaken but it is difficult to see how this has informed the architecture*

*The desire to turn the A4 at this point into a street rather than a road solely for vehicles, is welcome, and we feel the development goes a long way in achieving a successful active frontage at this point.”*

9.6 As a result of the comments received from the Design Panel the developers reconsidered the scheme to produce the proposals which are currently being considered. This involved

- The removal of lower level accommodation on the podium above the shopping centre
- Massing from the west to the east stepping away from St Ethelbert’s Church.
- The towers above the shopping centre being of the same appearance
- The towers being shaped and sculptured with silver cladding.
- The provision of penthouse apartments.

9.7 This amended scheme was presented to Members in January 2014. The following table shows gives a view of Members concerns and how they were further addressed by the applicants with additional discussion in the section below:

<p>The Scheme as now amended was a marked improvement, but was not a flagship scheme and there remained a way to go before concerns were fully satisfied.</p> <p>The ‘silver’ theme was an improvement over painted concrete. Could this be extended throughout the scheme?</p>	<p>Further changes and amendments were made as outlined below.</p> <p>The buildings will have silver composite cladding and would be the main material in the residential towers above the shopping centre and will contrast well with the glass fascia of the stand alone tower and the</p>
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<p>Concerns remained regarding the height of the towers vs. the height of St. Ethelbert's Church and it was not in accordance with the Council's Core Strategy which had indicated a limit to 15 floors.</p> <p>There were concerns regarding the addition of what appeared to be elevator shafts external to the towers, which result in a protruding spike over and above the top level of the towers and it was felt that the concern was that this was not aesthetically pleasing.</p> <p>Concerns were raised that signposting and sightlines from Slough railway Station to the High Street would be unclear as the towers would be obscuring the view. This could lead to issues with patrons being unsure how to get to the High Street.</p> <p>The view from Mackenzie Street towards the towers was also deemed not aesthetically pleasing and it was very important to get this right.</p> <p>The single circular tower was deemed not to be congruent with the remainder of the Scheme, though the design of this building was praised.</p>	<p>aluminium glazed façade of the retail units.</p> <p>Professional design advice that was taken was to make the towers even higher/slimmer, though a medium between the two has been attempted. The height had been capped at the height of the church spire. The Design Panel had advised that the height was not a problem but it was important to incorporate good design with the height and it is considered that this has been achieved.</p> <p>This issue has been resolved with the overrun incorporated into the building itself.</p> <p>The towers would signify the Town Centre and act as a marker to draw people to the Town Centre.</p> <p>It is not considered that the towers would have an adverse impact upon Mackenzie Street as they would be a distance away from the edge of the street and would set the back drop to Mackenzie Street rather than appear as part of it.</p> <p>The stand alone tower will act as a beacon for Slough Town Centre and therefore has a different design to the towers above the shopping centre to make the most of the shape of the site and act as a true landmark.</p>
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- 9.8 The matter of height was discussed by the design panel. It was stated that there was no concern with regards to the overall height of the development, but the height would need to be justified with a coherent approach to having towers on the site, how they respond to each other and impact upon medium or long views. The issues of the longer views are discussed further below in this report. The design is now considered to provide a clear and coherent massing proposal, as the towers rise in height from the west. This is so that the impact on St Ethelberts Church is minimised and will provide a landmark development within Slough Town Centre, with well designed and sleek architecture which will help improve the appearance of the area.
- 9.9 The massing and the design of the proposed development picks up some of the characteristics of the surrounding area. Heights are similar to the approved Development Securities building on the site to the north west of the application site. With the buildings

being of curved design, with metallic and glazed finishes, it will be in keeping with nearby buildings, such as the Curve and Slough Bus Station.

- 9.10 The proposed towers themselves, with the massing having a coherent strategy as discussed above together with the design, height and massing of the building is providing a clear vision of the building, taking in elements of the surrounding area with a clear strategy of providing an uplift to the Town Centre. While the towers themselves are going to be large and will be seen from many view points around the town they will be of good design and will be conditioned to use high quality materials so that they will not appear to be detrimental the character of the area. It will also provide a land mark development for the Town Centre, which will compliment other large scale development around the Town Centre and therefore enhance and conserve the character of the Town Centre.
- 9.11 These proposals will see the introduction of an active frontage onto Wellington Street with a glazed frontage and ground level providing a retail frontage with 60% of it being an active frontage. This new retail frontage will be predominantly glazed giving views into the retail units, allowing glimpses to the shopping centre beyond. This opens the shopping centre up onto Wellington Street thereby reversing the situation of the centre turning its back on Wellington Street and acting as a barrier between the High street and the area to the north with the provision of an active frontage.
- 9.12 The proposals will add additional mass and bulk onto Wellington Street and this in turn will produce significantly greater enclosure along Wellington Street. However this needs to be balanced against the high level of design in the proposals, including the shape of the towers so that they will look sleek and sculptured from Wellington Street, the positive impact of the active frontage and the continuation of the Heart of Slough urban realm along Wellington Street. It is therefore considered on balance that the proposals will have a significant impact along Wellington Street, but this will be a positive impact and one which will not be harmful to the character and appearance of the street and provide an improved shopping frontage and public realm.
- 9.13 The towers that rise above Queensmere will also be seen by people arriving from the bus and train stations to the north, especially along Brunel Way. This will provide a strong landmark for those people wanting to direct themselves towards the Town Centre by providing a point of reference announcing the location of the Town Centre. This would however result in the loss of views of the St Mary's Church spire which is currently seen from this location, which is an important historical landmark. It is considered that on balance the loss of the view of the church spire, for the provision of a positive new landmark can be accepted due to the benefits of the scheme.
- 9.14 The current proposals provide links from the shopping centre to the north, with entrances to the centre on the desire lines to the bus station and Tesco's. The proposals will also open up a link between St Ethelbert's Church and the shopping centre and the Curve building. Plans have been provided to show how this important access way would be laid out and shows the area to be relatively well planted with a selection of cycle parking and seating areas. The area will be further improved with the units facing onto the passage way being used as restaurants, cafes and takeaways providing an active frontage and help to make the access way more welcoming. The importance of good pedestrian links between the station, car parks and High Street is pivotal to the success of the town centre and these proposals will improve such links and therefore improve the vitality and viability of the shopping centre and wider Town centre.
- 9.15 Internally there will be little change to the shopping centre in terms of the links, although the larger units facing onto Wellington Street will still have accesses into the centre and Mackenzie Street will be slightly remodelled so that it will be curved allowing views from the Mackenzie Street entrance to the opposite side of the shopping centre. This will further open up the centre and provide better linkages through it.

- 9.16 The stand alone round tower building to the eastern end off the site will of different design, being a circular glazed tower with the provision of coloured glazed fins, compared to the other towers, with their slightly curved facades. This will provide another land mark building within the town centre and will add further interest. While being different in appearance it will add to the site as a whole as it will show a different contrasting style, adding variety and interest to the public realm.
- 9.17 The circular building will also have the provision of an external lift that will provide direct access for visitors to the top floor. This will give good long views across Slough and the wider area into Windsor and therefore this area should be fully utilised for these views. It is therefore proposed to use this area as a bar, restaurant or other commercial use where the views will add additional benefit. It could potentially also linked to Slough's heritage, linking it to William Herschel and other historical elements of the town. This will add a further interesting feature to the scheme that will attract people to the town and improve the vitality and viability of the Town Centre.
- 9.18 The residential element of the development has been laid out so that the flats will be accessed from relatively short corridors, with approximately 9 doors without bends or corners providing appropriate form of layout. Each block will also have its own access onto Wellington Street or the new public realm to the western end of the site, providing good links and access to the Town Centre and transport links.
- 9.19 The accommodation now provided in the residential element of the scheme allows for 346 X 1 bedroom flats and 329 X 2 bedroom flats and is a split which is considered acceptable for a town Centre location where there would not be the expectation to see many families located. The scheme further provides for penthouse type apartments at the top of the towers, providing further improved accommodation, which is lacking within the Town Centre and providing additional forms of living for those who otherwise might not be attracted to Town Centre living in Slough.
- 9.20 Therefore it is considered that the proposals provide a design which is acceptable for the area, provides a suitable mix of housing type fully capitalising on the opportunity to provide clear and strong links to the shopping centre and High Street and fully utilises the opportunity to provide a full retail led regeneration of the area.

## **10.0 Impact on the Surrounding Area including Listed Buildings**

The National Planning Policy Framework outlines the following points:

- 10.1 *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal" (para 129)*
- 10.2 *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites,*

*should be wholly exceptional” (Para 132).*

- 10.3 *“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should ... always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings (Para 17).*

*The Composite Development Plan for Slough*

- 10.4 Core Policy 8 states *“The design of all development within the existing residential areas should respect the amenities of adjoining occupiers and reflect the street scene and the local distinctiveness of the area ... Development shall not give rise to unacceptable levels of pollution including air pollution, dust, odour, artificial lighting or noise”.*
- 10.5 Core Policy 9 states that *“Development will not be permitted unless it:*  
• *Enhances and protects the historic environment;*  
• *Respects the character and distinctiveness of existing buildings, townscapes and landscapes and their local designations;”*
- 10.6 Policy EN1 of the Local Plan requires that *“Development proposals are required to reflect a high standard of design and must be compatible with and/or improve their surroundings in terms of a) scale, b) height, c)massing/Bulk, d)layout, e)siting, f)building form and design, g)architectural style, h)materials, i)access points and servicing, j) visual impact, k)relationship to nearby properties, l)relationship to mature trees and m)relationship to water courses. These factors will be assessed in the context of each site and their immediate surroundings. Poor designs which are not in keeping with their surroundings and schemes which result in over-development of a site will be refused.”*
- 10.7 Policy EMP2 of the Local Plan requires that: *“there is no significant loss of amenities for the neighbouring land uses as a result of noise, the level of activity, overlooking, or overbearing appearance of the new building”.*
- 10.8 The proposed development would change the image and appearance of Slough Town Centre and in order to fully consider the impact of these changes a Visual Impact Assessment has been prepared and submitted with the application. In terms of the impacts upon the Town Centre the following view points have been considered:

LOCATION	IMPACT	REASONS
Wellington Street / St. Ethelbert's Church	Moderate Beneficial	Provision of active frontage and appropriate scale given to the building frontage
Wellington Street / Aldin Avenue North	Moderate Beneficial	Gives a positive reference of the Town Centre
East end of High Street	Moderate Beneficial	Will draw sight and attention to the main part of the Town centre and commercial core.
High Street / Mackenzie Street	Neutral	Creates a new skyline for the shopping centre drawing attention to the Mackenzie Street entrance.
Alpha Street	Neutral	Distant change to the sky line but again identifies the Town Centre
Park View / Herschel	Moderate	Some impact from the blank elevations facing

Street	adverse impact	onto this area and some confusion of their scale and function.
Church Street – Herschel Street	Moderate adverse impact	Some impact from the blank elevations facing onto this area and some confusion of their scale and function.
Heart of Slough	Significantly Beneficial	New Wellington Street frontage and back drop to St Ethelbert's Church

10.9 In taking the above into consideration, it is considered that the change to the Slough Town Centre skyline would be acceptable as it would introduce a new landmark to draw people to the Town Centre. While there would be some adverse impacts from the Park View / Herschel Street and Church Street / Herschel Street views, these impacts would be moderate and the presence of a new Town Centre landmark building would overcome these moderately adverse impacts. Furthermore the towers would not have an adverse impact upon the existing Town Centre where it is considered that they would not appear overbearing as they are set back behind the High Street and will simply act as a back drop to the High Street, which will remain at a pedestrian scale.

10.10 Due to the sheer size and scale of the development it will have an impact over a wider area of Slough. The Visual Impact Assessment therefore also considered the following:

LOCATION	IMPACT	REASONS
Stoke Road / Elliman Avenue	Slight Beneficial	Longer view that respects St. Paul's Church in the foreground and provides a Town Centre reference
St John's Road	Neutral	The clear Town Centre landmarks competing with the residential amenity in the fore ground.
Wexham Road Rail Bridge	Significant Beneficial	Allows for a Town Centre reference for those navigating from this location
St Bernard's School Conservation Area	No impact	Completely screened
Lascelles Park	Neutral impact	The profile of the proposed building will replicate the current scale and form of the existing buildings
Entrance to Herschel Park at Upton Close	Negligible impact	Most of the development is screened by trees
Datchet Road Roundabout	Moderate beneficial impact	Landmark for the Town Centre from this important gateway with no impact on the Listed Building in the foreground
St Marys Church	Moderate adverse impact	Most of the building will not be visible above the roof of the church although due to the important nature of the building the impacts would have a moderate adverse impact
Slough Road / Ragstone Road	Slight neutral impact	Lack of clear visibility in terms of distance and sightlines
Lascelles Road M4 bridge	Slight beneficial impact	Appears above the tree line to show where the Town Centre is
Datchet Road nr Datchet Mead Hotel	Slight beneficial impact	Clear landmarking of the Town Centre
A332	Slight adverse impact	New back drop to the St.Mary's Church spire and changes the relationship of the skyline where the spire is currently the most visible landmark from this location
Stoke Poges Lane /	Slight	Not visible enough to create a positive landmark

Blair Road	neutral impact	
Bath Road / Montem Lane	Slight beneficial impact	Provides strong Town Centre landmark
Bath Road / Cippenham Lane	Negligible impact	Lack of clear visibility
Huntercombe Roundabout	Negligible impact	Lack of clear visibility

10.11 The proposed towers would therefore be visible from many areas in Slough, however would not have a detrimental impact upon the wider area and where there would be some sort of impact it would not be so detrimental as to warrant refusal of the application due to the limited sensitivity of the area effected or the limited impact on the sensitive areas.

10.12 The following long term views were identified and assessed:

LOCATION	IMPACT	REASONS
Windsor Castle North Terrace	Significant adverse impact	New set of landmarks and skyline for the town impact on the horizon
Windsor Castle Copper Horse	Moderate adverse impact	New set of landmarks and skyline for the town impact on the horizon although is comparable to Windsor Castle

10.13 The setting of Windsor Castle, an internationally significant building of high sensitivity, and its surrounds would be affected, as the proposed development would rise above the existing horizon resulting in a new skyline for the Slough. While it would be visible, the impacts are not considered to be significant enough to refuse the application, due to the distance from Windsor Castle. It should be noted further that Historic England (previously English Heritage) has not objected to the scheme, indicating that they do not consider the impact to be so severe for them to formally object to the scheme.

10.14 While the development will change the skyline of the town, due care has been given to provide a development that provides the required Town Centre landmark building. The buildings will be of high quality design so that it does not have a detrimental impact upon the immediate, medium and long views so much so that it would be harmful to these areas.

10.15 The proposed development will result in large and dominant buildings within the town centre and would have an impact upon the overshadowing and shading experienced on Wellington Street. However this would not be a big difference than that currently experienced and should not be a significant impact. Likewise the proposals would have a negligible impact upon Wellesley Road in terms of loss of day light and sunlight, which has been identified in the Daylight / Sunlight / Overshadowing Assessment submitted with the application.

10.16 The proposal site is surrounded by several heritage assets including:

- Church of Our Lady and St Ethelbert and St Ethelbert's Presbytery (Grade II Listed Building)
- 1-7 Mackensie Street (Locally Listed Building)
- Properties in High Street (Locally Listed Building)
- Properties in Windsor Road and Park Street (Locally Listed Building)
- Slough Old Town

10.17 At present the area east of the church and presbytery is unwelcoming and does not benefit the setting of a listed building. The renovation around this area will make it more vibrant and the introduction of A3 type uses along this west side of the development should



potentially enhance the currently somewhat degraded setting of the listed buildings. The provision of taller buildings in this location will not dwarf the Church and will not be overbearing. The setting of the Church will not be impacted by the tallest buildings as the area closest to the church would accommodate the smallest towers, progressing up to the largest towers at the eastern end of the shopping centre, furthest away from the church.

- 10.18 Accordingly the scheme should improve the aspect to Wellington Street and an enhanced setting for St Ethelbert's church. In listed building setting terms the scheme is considered acceptable.
- 10.19 Some Impact would arise in relation to the setting of the Old Town Area and it would be visible in the short and long range views. However due to the distance between the area and the proposed development, the retention of the historic building stock and the improvement of the quality of the existing application site would result in beneficial impact.
- 10.20 In terms of impacts on locally listed buildings in the central and eastern parts of the High Street the landmark building would enhance the setting of the Town Centre assets and be of beneficial impact. There would be some further impact upon the properties in Mackenzie Square, Park Street and Alpha Street due to the scale of the development and possible overbearing impact. However due to the separation distances and the urban environment the assets are contained within the impact in considered being minimal. Furthermore any harm to these assets is outweighed by the significant public benefit the scheme will bring to the area and a reason for refusal could not be sustained on this reason.
- 10.21 Consideration also needs to be given with regards to the possible impact the development may have on daylight and sunlight on the nearby residential uses. The nearest residential uses would be on Wellington House, which is the office building on the same site as the Queensmere Shopping Centre and raises 5 floors above the shopping centre. Planning permission has been granted to convert the building into residential flats for 100 flats (2 no. studio flats, 76 no. x one bedroom flats 22 no. x two bedroom flats). The Daylight / Sunlight / Overshadowing Assessment submitted with the application states that there would be some moderate adverse impact upon these properties in Wellington House. It is considered that these impacts are mitigated as the properties are in the same ownership and is used for short term lets only.
- 10.22 The windows in Wellington House would also be approximately 15m from the proposed development, which while not ideal is considered to be acceptable within a Town Centre location, where higher density housing is appropriate and therefore some relaxation in such issues are considered acceptable.
- 10.23 There would be some negligible impact on a property in Wellesley Road, but is not of such severity to be of noticeable impact and therefore a refusal could not be sustained on this.
- 10.24 The proposals would also have some impact on the neighbouring St. Ethelbert's Church and Presbytery would be impacted in terms of daylight and sunlight but only one window would be adversely impacted and some improvement would be obtained from the removal of the vehicle ramp at the rear of the site so that the impact would not be significantly noticeable and a refusal could not be brought for this reason.
- 10.25 The proposed development is also close to the HTC building to the east, but as this is a commercial building, it is not afforded the protection given to residential buildings in terms of loss of light. Therefore no objections are raised with regards to the impact on this building.
- 10.26 It is considered that the proposals would not have a detrimental impact upon the character and appearance of the surrounding area or surrounding buildings. Any impacts on the surrounding area would not be so severe as to outweigh the public benefits provided of the

scheme, in the terms of Town Centre regeneration.

## 11.0 Living conditions for future occupiers

11.1 The National Planning Policy Framework states that following with regards to impact upon the amenity of future occupiers:

*“Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):*

- making it easier for jobs to be created in cities, towns and villages;*
- moving from a net loss of bio-diversity to achieving net gains for nature;*
- replacing poor design with better design;*
- improving the conditions in which people live, work, travel and take leisure and*
- widening the choice of high quality homes.” (Para 9).*

11.2 *“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people” (para 56).*

11.3 *“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.” (Para 73)*

11.4 Core Policy 8 states *“All development will: a) Be of a high quality design that is practical, attractive, safe, accessible and adaptable; b) Respect its location and surroundings; c) Provide appropriate public space, amenity space and landscaping as an integral part of the design....*

11.5 The Council are keen to see that the residential units to be provided under this scheme are of a high standard to serve the people who may be moving into the area. The applicant has confirmed that the development will remain in their ownership and will form part of their Private Rented Housing development portfolio. This will ensure that the management of the development will be maintained and that the development will be kept at a reasonable standard so that the applicant will maximise the return that they will expect to receive from the development.

11.6 In order to ensure that the development is of the high quality, both internally and externally, the applicant has provided an Interiors Design Code, which shows the final specification of the proposed flats. This shows that the units will have oak or walnut finished doors and floors, fully tiled bathrooms with quality fittings, built in wardrobes and kitchens with gloss cabinets, integral appliances (Larder fridge, freezer, fan assisted oven, and washer dryer). Some Members may be aware of the proposed fit out as it is the same as that of the recently developed flats in the High Street, which some Members previously visited. Furthermore some larger apartments will be provided at the top of the towers providing better views to the south. This shows that there is a commitment to provide high quality accommodation within this development and the Interiors Design Code would be secured via condition, to ensure that a high quality development is delivered.

11.7 Consideration with regards to the size of some of the residential units has been considered as this will go further to dictate the quality of the proposed units and ensure that they will provide suitable living accommodation. The following shows the adopted room sizes that should be provided for in the development:

	Living Room and Kitchen	Bedroom 1	Bedroom 2
1 Bed	20.25 m <sup>2</sup>	11.14 m <sup>2</sup>	---

2 Bed	22.29 m <sup>2</sup>	11.14 m <sup>2</sup>	6.5 m <sup>2</sup>
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- 11.8 The proposed rooms meet the requirements as set out above and therefore provide appropriately sized accommodation that goes to add to the quality of the proposed development.
- 11.9 The Daylight / Sunlight / Overshadowing Assessment that was submitted with the application demonstrates that the units in the proposed development would by and large receive the appropriate levels of sun light and day light, some of the units will suffer from levels of daylight below the recommended guidelines at the lower levels of the towers, with the bottom 4 levels being the worse effected. However of these windows effected most will meet the average daylight factor for living rooms (1.5%), but not kitchens (2%). Therefore it is considered that if the appropriate levels of light for living rooms are maintained, then no reason for refusal could be sustained. It is worth bearing in mind that the BRE Report that the standards are taken from, does not recommend a pass or fail determination, but rather that it should act as a guide to good practice, and would not necessarily act as a reason to refuse the application.
- 11.10 The lower levels of the stand alone tower would suffer more with regards to appropriate levels of daylight and sunlight. It is therefore proposed to use these levels to provide additional leisure facilities for the users of the development. While overcoming this issue, it would also provide further facilities to improve the quality of the accommodation provided in the building.
- 11.11 Most of the units would be single aspect with views to the west and the east and although not ideal, a form of outlook is still provided and it ensures an appropriate level of amenity. There would be a separation distance of 22m to 43m between the towers, which would ensure that an appropriate form of outlook is maintained while ensuring that there would not be any overlooking between the towers.
- 11.12 As the site is situated next to the A4, there is a possible related issue with regards to noise disturbance to the residents of the proposed residential units. The Noise Assessment submitted with the application states that if a good standard of double glazing is installed throughout the development, with acoustic glazing where require, there should be acceptable noise levels within the development. Acoustically treated ventilation would also need to be installed to ensure that windows will not need to be opened to ventilate the rooms. Furthermore the assessment of traffic flows shows that there would be negligible increases in traffic noise. An appropriate condition could be applied to any permission to ensure that an appropriate level of noise within the development is provided.
- 11.13 Amenity space would be provided for the residents of the proposed development on the podium level of the shopping centre between the towers. The following areas would be provided within the amenity area:
- Outdoor chess tables with planting;
  - Passive green open space;
  - Areas of biodiverse planting;
  - Play zones with table tennis, play mounds, sculptures, synthetic turf and seating
  - Open space with sculptures, seating and play features;
  - Out door recreational gym with running track;
  - Semi enclosed space with containerised trees.
- 11.14 This area is considered to be a high quality amenity space that will provide good levels of amenity to the residents of the proposed development and will be accessible so all residents will have some amenity area within easy reach of their dwellings.
- 11.15 It is therefore considered that the scheme provides high quality dwellings for future

residents with a suitable standard of amenity that fully considered the future occupiers needs.

## 12.0 **Transport and Parking**

12.1 With regards to issues of transport and parking the NPPF states:

*“All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- *safe and suitable access to the site can be achieved for all people; and*
- *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.*

*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.” (para 32)*

12.2 *“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.” (Pars 34)*

12.3 *“Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to*

- *accommodate the efficient delivery of goods and supplies;*
- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*
- *incorporate facilities for charging plug-in and other ultra-low emission vehicles; and*
- *consider the needs of people with disabilities by all modes of transport. (para 35)*

12.4 *A key tool to facilitate this will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan. (para 36)*

12.5 *Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities. (para 37)*

12.6 *For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (para 38)*

12.7 *If setting local parking standards for residential and non-residential development, local planning authorities should take into account:*

- *the accessibility of the development;*
- *the type, mix and use of development;*
- *the availability of and opportunities for public transport;*
- *local car ownership levels; and*
- *an overall need to reduce the use of high-emission vehicles. (para 39)*

12.8 *Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should*

*set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate.” (Para 40)*

- 12.9 Local Plan Policy T2 requires residential development to provide a level of parking appropriate to its location and overcome road safety problems while protecting the amenities of adjoining residents and the visual amenities of the area.
- 12.10 In terms of the vehicle trip generation, the Transport Assessment has stated that the development will add an additional 134 vehicle trips in the AM peak, 147 in the PM peak and 175 on a typical Saturday. These figures are considered as being acceptable and will not impact upon existing highway capacity or safety.
- 12.11 With regards to access onto the site it was originally proposed to use the existing roundabout on the Queensmere Road / Wellington Street junction. However as the development would result in an increase in the number of people using Wellington Street as the shopping centre addresses the street, appropriate pedestrian crossing facilities would need to be installed. However this was not possible to do in a safe manner and therefore a T-junction has been designed for the entrance. This will incorporate safe crossing for pedestrians and cyclists while having no detrimental impact upon the traffic on the A4. In order to facilitate this change a further change will need to be made to provide a right hand turn from the west bound A4 into Wexham Road, as vehicles will no longer be able to turn round the roundabout and go back up the A4 to turn into Wexham Road. This has again been agreed by the applicant and final details are being agreed.
- 12.12 The applicant has agreed that all of the works within the public realm will be completed using Heart of Slough materials. This will see the continuation of the Heart of Slough up Wellington Street. It is considered to result in a better urban realm in this area and will go further to improve the appearance of the shopping centre.
- 12.13 There are 1,405 existing car parking spaces across both shopping centres and the Queensmere shopping centre car park will be rebuilt as part of the development with no increase in the number of parking spaces. Under the Slough Local Plan Parking Standards the minimum number of spaces required for residential developments in the town centre is nil. However this does not prevent developers providing spaces should they choose to do so and the applicant has been encouraged to provide some level of parking provision
- 12.14 Parking provision has been provided for 15% of the total number of flats making a total of 102 parking spaces which is acceptable for a site which is in a highly sustainable location, such as this. Furthermore additional parking will be available as there will be capacity during the week and the weekend so that additional residential parking could be made available if required. Five disabled parking spaces and four spaces for a car club will be made available before the parking barriers. Therefore it is considered that appropriate levels of parking will be provided for this development.
- 12.15 Active signing informing users of car parking availability from the Wellington Street access point is welcomed as this should help manage demand and will be secured within the S106 agreement.
- 12.16 The re-built Queensmere car parking will need to accord with the Park Mark: Safer Parking Scheme standards and electric charging points will also be provided. This will form part of the Section 106 obligations.
- 12.17 A car club will be provided as part of the development with free membership for the residents for the first three years with a possible maximum of four cars being provided with one on first occupation and another on occupation of the 20<sup>th</sup> flat and as per requirements thereafter. This is supported by the Council's Transport Consultant.

- 12.18 Cycle parking is proposed within cycle cages located on each floor of the residential development and is considered a suitable option for resident cycle parking. In addition to this a cycle hub will be provided on the ground floor level for 453 cycles for the residential and retail elements of the site and has additional shower and locker facilities as well as a bike accessory area. The provision of such a hub is acceptable and the final details are being discussed, with regards to its use, facilities and security.
- 12.19 The applicant's have provided a draft Travel Plan in relation to the residential and retail elements of the site and has been considered further by the Council's Transport Consultants and further elements of this are being discussed and will be secured via the Section 106 Agreement.
- 12.20 The Council's Transport consultant has considered the information that has been provided to date and considers that appropriate parking provision has been provided and the development would not result in any highway safety or capacity issues.

### 13.0 Sustainability and Environment Issues

- 13.1 The NPPF states that :

*"In determining planning applications, local planning authorities should expect new development to:*

- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption" (para 96).*

- 13.2 *"Planning policies and decisions should aim to:*

- avoid noise from giving rise to significant adverse impacts<sup>27</sup> on health and quality of life as a result of new development;*
- mitigate and reduce to a minimum other adverse impacts<sup>27</sup> on health and quality of life arising from noise from new development, including through the use of conditions;*
- recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and*
- identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. (para 123)*

- 13.3 Core Policy 10 states that

*"Development will only be allowed where there is sufficient existing, planned or committed infrastructure. All new infrastructure must be sustainable.*

*Where existing infrastructure is insufficient to serve the needs of new development, the developer will be required to supply all reasonable and necessary on-site and off-site infrastructure improvements. These improvements must be completed prior to the occupation of a new development and should serve both individual and communal needs.*

*Infrastructure includes:*

- Utilities (water, sewerage and drainage);*
- Transportation;*
- Education and skills;*
- Health;*
- Leisure, community and cultural services; and*
- Other relevant services.*

*The provision of reasonable and necessary infrastructure will be secured through planning obligations or by conditions attached to planning permissions."*

- 13.4 Thames Water has stated that there is some concern with regards the existing sewer system being able to take any additional capacity. They have suggested a condition, which will allow a solution to be found before the commencement of the scheme. Other service supplies seem to be acceptable for the proposed development.
- 13.5 The applicant has confirmed that the proposed development would meet the Code for Sustainable Homes Level 3 and be in accordance with Homes for Life for the residential element and the retail element of the scheme will achieve very good BREEAM status and can be secured via a Section 106 Agreement.
- 13.6 The proposed development will not result in any increased risk of flooding.
- 13.7 As the site is located on a former gas works, there is some potential risk of land contamination and pollution to controlled waters. This can again be controlled by means of a condition to provide additional details of how any such contamination will be treated prior to the commencement of any works.
- 13.8 The applicant's report into Electronic Interference has stated that the proposed development may have some effect upon TV reception in the area although this can be mitigated and this can be covered via condition. Arqiva is responsible for providing the BBC and ITV's transmission network and have been consulted on this application as they are responsible for ensuring the integrity of Re-Broadcast Links and have stated that they have no objection to this application.
- 13.9 The applicant has provided an Air Quality Assessment, which states that concentrations of pollutants across the site are below NAQ levels and therefore air pollution is not a significant issue and there will be no significant increase to sensitive receptors.
- 13.10 Due to the large nature of this scheme it was considered to fall within the scope of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 and the application required the submission of an Environmental Statement, for which a Scoping Opinion was issued in January 2012.
- 13.11 The Scoping Opinion stated that the following issues should be considered in terms of the impact they development may cause in the immediate locality and the wider area:
- Townscape and visual impact;
  - Traffic generation, vehicle movements and activity;
  - Retail services;
  - Socio-economics and population;
  - Water, air and climatic factors, including radio and media reception;
  - Heritage assets and important views;
  - Use of natural resources, the emission of pollutants and the creation of nuisances and waste;
  - Inter-relationships between the above.
- 13.12 The issues contained in the Scoping Report have been covered in the report above and it is considered that the appropriate details under the Environmental Impact Assessment Regulations have been complied with.
- 13.13 Paragraph 14 of the National Planning Policy Framework sets out a presumption in favour of sustainable development and in such circumstances permission should be granted



unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. The proposals considered under this application are therefore considered under the following principles of sustainability.

13.14 Environmental

As discussed in the report above the proposals are considered to have a positive impact upon the character and appearance of the surrounding area and would have no environmental impacts upon the surrounding area.

13.15 Economic

The provision of high quality housing, additional retail and the viewing tower has economic benefits as will the improvements to the Town Centre public realm which together will provide a better offer for people living in and visiting the Town Centre and improve the vitality and viability of the Town Centre.

13.1 Social

These proposals are considered to result in some social benefits with the provision of housing in the borough and also to improve the vitality and viability of the Town Centre and provide better facilities for local residents and visitors to the town.

14.0 **S106 Agreement**

14.1 The applicant has confirmed that the following works will be funded and undertaken by them:

- Costs to form the signalised T junction access to the site.
- Costs to improve the offsite junction at Wexham Road.
- The observatory / viewing gallery costs.
- Costs to comply with Heart of Slough external works specification.
- Costs to comply with Interior Design Code.

14.2 In terms of making the scheme acceptable in transport terms the following contributions will be required and secured via the Section 106 Agreement:

- Variable Message Signing Scheme on approach to development on A4 Wellington Street (including minimum of two VMS signs) and VMS signs on Queensmere Road leading to the car parks advising which car parks have spaces available;
- Real time passenger information screens (no. and location to be agreed);
- Electric charging bays in both Queensmere and Observatory car park (see further guidance from IAQM);
- Car Club vehicles number and phasing to be agreed, specification of vehicles to be agreed in terms of low emission standard);
- Commitment to funding car club vehicles until at least development is fully built out;
- Car Club membership free for three years for all occupiers;
- Personalised Travel Planning contribution (further discussion);
- Welcome Pack (to be approved by the local highway authority prior to distribution);
- Occupiers of the development will be ineligible to apply for parking permits in any existing or future on-street residents parking zones;
- Travel Plan (submitted document to be revised as per comments above and then appended to S106);
- Travel Plan Monitoring contributions - residential and for commercial development;
- TRICS SAM surveys for TP monitoring including survey years;
- Funding of the Travel Plan Coordinator – budget allowance commitment;
- Cycle/public transport vouchers (further discussion required);
- Reconstructed car park to be built to Park Mark Standard;

- Cycle Hub including agreed internal specification;
- Contribution to fund stopping up of redundant highway (Queensmere Road);
- Implementation of SCOOT and MOVA at the new signalised T-junction and link proposed toucan crossing at Wexham Road to the existing Uxbridge Road roundabout and the new T-junction at Queensmere Road;

- 14.3 A development with this number of residential units requires on-site provision of affordable housing and contributions towards education and public open space as per the Developers Guide. However in practice as the flats are to be operated by a Private Rental Company, service charges are likely to be unaffordable for applicants eligible to be nominated to the tenancies available. In addition, there is a risk a very high concentration of one bedroom flats occupied by those in housing need or with insecure incomes for example could lead to neighbour and management problems. As such a contribution for off-site provision has been agreed. The intention is that this should then also enable the occupants to be there through choice, and the flats and facilities to be suited to the tenure provided. This in turn will then create a positive living environment, and a population who can utilise the town centre's facilities.
- 14.4 A viability statement has been submitted by the applicant with regards to what is viable to be paid and initially suggested that no sums were payable as the scheme had a negative viability. However after further scrutiny of the assessment and negotiations a sum of 4 million pounds has been offered by the applicant. This offer would cover all of items mentioned in the paragraph above and any additional highway contributions. Officers are of the opinion that this figure is the maximum amount that would still ensure that the development is viable, but that the detail of how this would be prioritised for allocation still requires further discussion.
- 14.5 When this offer is considered against the fact that the scheme will produce much needed benefit for the Town Centre, as set out above, officers are of the opinion that this offer should be accepted. It is believed that without this development the existing shopping centre will continue to suffer decline and provide a low quality offer that will further impact upon the vitality and viability of the Town Centre.
- 14.6 The applicant's have stated that they are proposing to start undertaking the development within nine months of obtaining planning permission and have already tendered the work out to contractors. Therefore with work being undertaken on the site early it would be inappropriate to have any claw back should profits rise as every effort will be taken to get the development implement on site. The Section 106 Agreement would require the early commencement of the scheme as well as providing for the phasing of the scheme.

## **PART C: RECOMMENDATION**

### **15.0 Recommendation**

- 15.1 Delegate the planning application to Planning Manager for the consideration of any outstanding consultation responses, minor design changes, completion of Section 106 Agreement, finalising conditions and final determination.

### **16.0 PART D: CONDITIONS**

The heads of the following draft planning conditions are proposed in the event that planning permission is granted. The list is not exhaustive at this stage and may be subject to change before a final determination is made

1. Time Limit (*cross reference with S106*)
2. Approved Plans
3. Approved Reports
4. Materials
5. Development in accordance with the design code
6. Access
7. Cycle Parking
8. Surface Water
9. No doors on highway
10. Car Park Management Plan
11. Servicing Management Plan
12. Surface details
13. Refuse storage
14. Landscaping
15. Landscaping Management Plan
16. Working Method Statement
17. Glazing
18. Ventilation
19. Contaminated Land
20. No Piling
21. Bird Hazard Management Plan
22. Delivery Times
23. Use of plant and machinery
24. Internal Noise Standards
25. Drainage Strategy
26. Water Impact Study
27. Archaeology
28. Use Class restriction on viewing platform
29. Entrance security details
30. Safer parking Scheme Standards
31. TV signal strength

## **APPENDIX A: CONSULTEE RESPONSES**

1.0

### **HIGHWAYS AND TRANSPORT**

#### **Trip Generation and Trip Distribution**

The local highway authority has accepted the trip generation, it has some reservations with the assumptions made, and the accuracy of these assumptions will be tested by the travel plan TRICS based surveys. Clarification is required on what have changes have been made.

#### **Car Parking**

There are 1,405 existing car parking spaces in the two car parks. The Queensmere car park will be fully re-built as part of this development, but the number of parking spaces will not increase. Under the Slough Local Plan Parking Standards the minimum number of spaces required for residential developments in the town centre is nil. However this does not prevent developers providing spaces should they choose to do so. In respect of this application the applicant has been encouraged to provide some level of parking provision and in the local highway authority's previous comments this was recommended to be between 0.25 and 0.5 spaces per dwelling.

#### **Parking Accumulation**

Parking accumulation surveys have been undertaken at the Queensmere and Observatory car parks on two occasions: the first occasion was in May 2012 and the second occasion in July 2014.

The parking accumulation surveys do show a decline in use of the Queensmere and Observatory car parks between the survey dates. There are probably a number of factors why this has been the case and it is unlikely to be any one single factor.

What is clear from the parking accumulation surveys is that there are a large number of parking spaces available both on a weekday and at the weekend and these could be used for residential use.

The local highway authority has accepted the proposed level of parking provision of 0.15 spaces per flat. It acknowledges that the Car Park Management Plan allows for a greater proportion of residents to park cars on-site. Given that spaces are currently available within the two car parks and that the developer has agreed to allow residents to take up short term leases of spaces there is now the opportunity for a greater proportion of residents to park, which will alleviate the potential issues caused by not providing this facility. With the availability of the car club residents will be better placed to make decisions on the cost of owning a car and the cost of using a car club vehicle as and when required. Changes are required to the Car Park Management Plan to address the issues raised at this stage, but I would also recommend that an updated Car Park Management Plan is secured through a planning condition in case there are any further changes between planning consent and first occupation.

#### **Car Park Design**

The car park design is shown in Drawing TSP/SSC/P220-9/71 rev A. Clarity has been requested from the consultant as to whether there will be any visibility between vehicles leaving the car park and vehicles emerging from the service deck down the ramp. It is unclear from the plans as to whether this is a kerb line or a solid wall and this clarity is required.

The car park design at its entry point shows incorporates a number of pick-up and drop off bays and the car club bays. This will make the entry point of the car park quite confusing for users and introduces hazards of turning vehicles across the entry queue when first time users may not be expecting these manoeuvres to occur. It is recommend that at the detailed design stage that a road safety stage 2 audit is undertaken in this location. It may be necessary to delete the pick-up and drop off bays further in the design process or potentially once the development is operational and therefore this should be picked up in the CPMP. Car park entry and exit technology is changing all the time and by the time this scheme is implemented it may not be necessary to have entry and exit barriers or alternatively the it may be possible to locate the pick-up and drop off bays and the car clubs within the barriered area of the car park.

An informative should be included requiring the car park to be designed to accord with The Institution of Structural Engineers document *Design Recommendations for multi-storey and underground car parks (Fourth edition)*, and it is recommended that a Variable Message Signing system is installed to assist car drivers in navigating to available car parking spaces.

Some of the aisles within the car park are below 6m. In particular on the north side of the floor to floor ramp the aisle in this part of the car park measures just 4.5m. This is unacceptable and the design will need to be amended. Some of the bays and aisles around the stairwells are also below minimum dimensions.

#### Park Mark

The re-built Queensmere car parking will need to accord with the Park Mark: Safer Parking Scheme standards. This will form part of the Section 106 obligations.

#### Electric Charging Points

The council will require the provision of electric vehicle charging bays within the development. The provision will need to be in line with the standards within the Institute of Air Quality Management's 'Land-use planning and development control: planning for air quality' document (April 2015). A copy of this will be provided to the applicant. This document recommends the following good practice:

*The provision of at least 1 Electric Vehicle (EV) "rapid charge" point per 10 residential dwellings and/or 1000metres squared of commercial floorspace. Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made.*

In respect of this application consideration needs to be given as to how many rapid charge points are to be implemented in the Observatory car park where the residential parking is proposed and what infrastructure will be provided in the re-built Queensmere car park. Noting the comments in the Car Park Management Plan some of the bays in the Queensmere car park may be used for short term residential use.

#### Car Park Design Summary

There are some minor design changes that are required and further clarifications on several points. The number of electric charging points should be agreed and will need to be agreed as part of the S106 agreement.

#### **Access and Other Highway Works**

One of the most welcomed elements of this development is the proposed change to vehicular access. The existing Queensmere Road junction that forms part of the Tesco/A4 Wellington Street junction will be altered by removing the Queensmere Road arm (In only) and the Queensmere Car Park vehicular exit (out only). This enables the development frontage (new shop fronts) to extend along the length of Wellington Street, which will help to transform Wellington Street from a dual carriageway into shopping street.

As a result of this change all vehicle access to Queensmere car park and the service deck above Queensmere shopping centre will be taken from the existing roundabout junction with A4 Wellington Street. This arm of the junction will also provide vehicular access to:

- the Yell Building and its underground car park (currently being converted to residential use);
- the Observatory car park;
- the ground floor service area for Queensmere shopping centre;
- a refuse collection area for one of the residential blocks; and
- the HTC building.

The existing traffic flow in and out of this arm will increase significantly with this change and therefore a key part of this assessment of the development has been to understand the impact of this additional traffic on this arm of the junction. It is particularly important to ensure that all road users, particularly vulnerable road users are considered in this assessment of this impact. The NPPF is very clear about this as it *“states that developments should be located and designed where practical to:*

- *Give priority to pedestrians and cycle movements;*
- *Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians; and*
- *Consider the needs of people with disabilities by all modes of transport.”*

There will be significant change in traffic flows with the closure of the Queensmere Road arm of the Tesco junction. This will have an impact on the pedestrians and cyclists crossing this arm of the roundabout junction whilst using the southern footway of A4 Wellington Street. With 675 new flats and 7,386 sqm of new commercial floor area, together with the construction of shop fronts onto A4 Wellington Street this will create significant additional demand for pedestrian and cycle trips using the southern footway of A4 Wellington Street. The TA does not acknowledge this increase in pedestrian/cycle demand nor does it acknowledge the increase in vehicle traffic using the Queensmere Road arm of the roundabout in terms of the impact it will have on the available gaps in traffic flow or the comfort of and safety of crossing this arm of the junction.

Without a controlled crossing facility, pedestrians (including the mobility impaired) and cyclists will find it harder to cross this arm of the junction as the traffic flow will be 90% greater in the Saturday lunchtime peak, 274% greater in weekday evening peak and 626% greater in the weekday morning peak hour. It will be harder to find gaps in the traffic to cross and motorists will be less willing to allow pedestrian/cyclists to cross as there will be fewer gaps for them to get out onto the A4 Wellington Street. Currently circulating traffic exits the roundabout at a greater speed than one would necessarily expect (an observation) and one of the reasons for this is that there is so much road space for circulating traffic that the behavioural response is that drivers drive faster. Taking into account the factors of volume of traffic increasing, speed of exiting traffic and increased in pedestrian/cycle demand it explains why the local highway authority has been very firm in its request for an improved route for pedestrians and cyclists along the southern footway.

Furthermore the local highway authority has also had experience of the Tesco development where the pedestrian crossing between Tesco and Queensmere shopping centre was not located on the desire line. This led to the majority of pedestrians ignoring the signal controlled crossings and crossing on the desire line, which has led to a number of accidents and ultimately the local highway authority has had to fund a new signal controlled crossing on the pedestrian desire line.

The local highway authority has requested that an improvement is made to the Queensmere Roundabout to provide a safe crossing environment for pedestrians and cyclists. In order to achieve this request, several design options were considered and this included trying to incorporate a controlled crossing on the Queensmere Road arm of the

roundabout. However it was not feasible to safely accommodate a controlled crossing in this location. Even if there had been sufficient space it would have had a detrimental impact on the operation of the roundabout. Therefore at the request of the local highway authority the developer was requested to design a signal controlled T-junction. However the local highway authority was not satisfied with the design.

Overall the local highway authority felt that the T-junction design could be improved upon, which would reduce the amount of queuing and reduce delays and provide greater capacity for the whole network and future proof the junction, particularly in order to accommodate an increase in traffic flows into and out of the Queensmere and Observatory developments. It was felt that the developer's design would lead to some unnecessary delay on the A4 Wellington Street due to the alignment of one of the crossing points and the decision not to provide a left turn slip lane into the development would create further delay for through traffic. Given that the local highway authority still has some reservations regarding the trip rates presented in the TA then it is reasonable that the local highway authority seeks an option that provides greater capacity and at the same time addresses the safety and comfort concerns for pedestrians and cyclists. The local highway authority proposed an alternative highway arrangement which is shown in Drawing No. TSP/SSC/P2209/70 Rev. A.

It should be noted that the left hand slip lane into Queensmere Road is likely to be required to be signalised as it would be unusual to mix and unsignalised crossing with signalised crossings in a junction arrangement.

The conversion of the Queensmere Roundabout to a T-Junction will mean that a right turn lane is required to be implemented from the A4 Wellington Street to turn into Wexham Road north. This will have a benefit to the wider network because as much as 24% of westbound traffic flow on the A4 Wellington Street (weekday PM peak) makes a U-Turn manoeuvre at the Queensmere Roundabout. The loss of the U-turn facility is considered acceptable for the following reasons:

- The loss of the U-turn facility is being mitigated by implementing a right turn lane from A4 Wellington Street into Wexham Road;
- Existing traffic using Wexham Road (section south of Wellington Street) that needs to U-turn at the roundabout can be accommodated by using High Street and then A412 Uxbridge Road;
- Only traffic egressing from the Observatory service deck will be disadvantaged by not being able to U-turn, but this can be designed into the routing strategies of the delivery vehicles limiting its impact.

There are also a number of benefits of making these changes:

- Will reduce traffic volumes on Wellington Street eastbound and in doing so will reduce vehicle delay for eastbound traffic and traffic exiting Queensmere Road;
- Will reduce air pollution in an existing residential area;
- Will help to smooth traffic flow along the A4 enabling better linking of junctions using SCOOT and MOVA software; and
- Will help to create more gaps in traffic flow on A4 eastbound and thereby reducing delay for vehicles exiting Wexham Road.

The right turn lane also incorporates a staggered toucan crossing on the west side of the junction with Wexham Road, as the opening up of the central reservation may encourage pedestrians to cross in this location. Pedestrians are already observed jumping over the central reservation safety fencing. This will allow the existing subway to be removed, which in turn will improve personal security for pedestrians walking to/from the town centre and the Queensmere/Observatory shopping centres. The toucan crossing should be linked to the operation of the two nearest signal junctions so that the impact of the crossing on traffic flow is minimised.



The provision of the right turn lane and the crossing will also help vehicles egressing from Wexham Road, which is shown in the TA to operate over capacity. In the last three years there have been 9 accidents involving vehicles pulling out of Wexham Road and travelling in a north to east direction. Whilst the TA argues that for road safety reasons the right turn should not be implemented, the local highway authority disagrees with the conclusions drawn by the consultant as the implementation of the right turn lane will increase the number and length of gaps for traffic egressing Wexham Road and therefore should contribute to reducing accidents.

#### Heart of Slough Materials

The developer proposes to extend the use of Heart of Slough materials to include the new highway works to Queensmere Road i.e. to the east side of the existing roundabout.

#### Road Safety Audit

A road safety stage 1 audit has been undertaken of each of the three schemes and has found that there are two issues that affect all schemes:

- That there is insufficient tactile paving and this can be easily addressed;
- Guard-railing is not proposed as per the wider Heart of Slough scheme which may lead to an increase in conflicts. On the section of Wellington Street between Queensmere Road and Brunel Way, guard-railing will not be introduced. On the Section between Queensmere Road and Wexham Road this will be considered in greater detail at the detailed design stage.

A meeting was held with Mark Cooper of Criterion Capital (the Developer) on 14 April 2015 in which the developer agreed to implement the SBC preferred T-junction option together with the right turn lane into Wexham Road and associated crossing. These discussions were welcomed and have removed the local highway authority's main objection to this development.

These works should be secured in the S106 agreement and implemented a S278 agreement. All of the highway works can be accommodated within the existing highway boundary. It is unclear at what stage the highway works would be undertaken and further clarity is needed on this from the developer.

### **Traffic Modelling**

#### Modelling Results

The results for the SBC T-junction option do show an improvement, in terms of capacity, over the roundabout option, and also over the consultant's proposed T-junction design in the 2023 future traffic scenario (+ committed + proposed development traffic). The results show the maximum DoS to be 87% in the AM Peak on Wellington St (West) in the sensitivity flow scenario. In the main development traffic scenario, the maximum DoS is 81% in the Saturday Peak increasing to 83% in the sensitivity flow scenario (as per Table 8.5 in TA). However based on the comments above, the pedestrian intergreens should be longer, which is likely to make the results slightly worse.

#### Modelling Clarifications

Further modelling results have been supplied to address the comments raised by Atkins.

However no model files have been supplied for checking. These results show a large increase in degree of saturation at the Queensmere Road proposed signalised junction (both proposed option and SBC option), with results previously reaching a maximum of 90% DoS, now predicted to operate at 258% and 269%. These are very surprising increases from the comments originally supplied (where changes were expected relating to intergreen times and staging), and hence the models, and a clear description of what has altered, should be supplied for checking. Overall the models supplied should be presenting the optimum operation possible (within the constraints of required intergreens etc).

### Wexham Road /Wellington Street

Modelling has been undertaken of the Wexham Road junction in the software package Junctions 8. This modelling has not been provided for review, so that the results have not yet been checked. The format that the results have been presented in the TA does not show the performance of the proposed right turn from A4 Wellington Street. Whilst the modelling presented in the TA shows Wexham Road North operating over capacity, it is mentioned that there is a significant amount of queuing for left turn traffic exiting Wexham Road North.

### Traffic Modelling Summary

Subject to the local highway authority being provided with the outstanding model files and assuming that the results are considered satisfactory then no further modelling will be required.

### **Cycle Parking**

The tenant cages and other cycle parking stores within the blocks are detailed below:

- Drawing 101 Rev. B: 1<sup>st</sup> Floor – shows Bike Parking within the Car Park. It is unclear who this is for;
- Drawing A-200 Rev.V: 2<sup>nd</sup> Floor – shows 8 flats and 4 cages in Block B and 11 flats and no tenant cages in Block A;
- Drawing A-300-A1 Rev.V: 3<sup>rd</sup> Floor – shows Block A has 12 flats, 4 cages and 8m2 cycle store for 4 bikes. Block B has 8 flats and 4 cages;
- Drawing A-400-A1 Rev. U: 4<sup>th</sup> Floor - Block A has 11 flats and 4 cages and 8m2 bike store for 4 bikes that does not work. Block B to E have 8 flats and 4 cages. Block F has 4 flats and no cages;
- Drawing A-500-A1 Rev. K: 5<sup>th</sup> Floor – shows 4 tenant cage stores in each block for the 8 flats. But in Block A (church) there are 11 flats with 4 cages plus a bike store measuring 4m x 2m for 4 bikes;
- Drawing A-600 Rev. B: 6<sup>th</sup> to 14<sup>th</sup> Floor – shows 8 flats per block with 4 tenant cage stores on each floor except spiral tower;
- Drawing A-700-A1 Rev. B: Block F has 7 flats and 7 stores. There is plenty of space to make the tenant stores larger in this location. Blocks B-E have got 8 flats and four cages;
- Drawing A-701-A1 Rev. B: Block B has 4 flats and 4 cages. Blocks C to E have 8 flats and 4 cages. Block F 7 flats and 7 cages and plenty of space to increase cages;
- Drawing A- 702-A1 Rev. B: 16<sup>th</sup> floor has Block B no flats, Blocks C to E have 8 flats and 4 cages. Block F has 7 flats and 7 cages with plenty of space to increase the cages;
- Drawing A1 600 Rev. A: Penthouse Apartments - shows cycle parking for 7 bikes in a store measuring 3.2 x 2.7m for the 5 two bedroom flats;
- Drawing A – 703-A1 Rev. B: 17<sup>th</sup> and 18<sup>th</sup> Floor – Blocks C to E 8 flats and 4 cages per block. Block F 7 flats and 7 cages with plenty of space to increase cage dimensions;
- Drawing A- 704 –A1 Rev. B: 19<sup>th</sup> Floor – Block C has 5 flats and 4 cages. Blocks D and E have 8 flats and 4 cages per block. Block F 7 flats and 7 cages with plenty of space to increase cage dimensions;
- Drawing A-705-A1 Rev. B: 20<sup>th</sup> Floor – Block D and E 8 flats and 4 cages per block. Block F has 7 flats and 7 cages with plenty of space to increase the cages;
- Drawing A-706-A1 Rev. B: 21<sup>st</sup> Floor – Block D to E 8 flats and 4 cages. Block F 7 flats and 7 cages with plenty of space to increase cage dimensions;
- Drawing A-707-A1 Rev. B: 22<sup>nd</sup> Level – Block D and E have 5 flats on each floor with 4 cages. Block F has F has 7 flats and 7 cages on each floor;
- Drawing A-708-A1 Rev. A: no flats accessible from this floor.

- Drawing A-709-A1 Rev. A: Roof Level – No flats accessible from this level.

### Bike Hub

Some discussions have been held regarding the cycle hub and further clarity is needed in terms of what exactly the hub will entail. Currently it provides space for 790 cycles in the form of sheffield racks and two wheel washing facilities. The bike hub can be used by both the residential and commercial elements of the development. The provision of facilities in the cycle hub are over and above what is required in terms of cycle parking at the development, not in lieu of good quality cycle parking provision. Furthermore the low car nature of the development means that even more efforts are needed by the developer to encourage the use of cycling to and from this site.

In terms of facilities / provision at the cycle hub we require the following:

- Provision of a secure environment manned at least during the day and late to the evenings, with a separate security system at night so people returning their bike late at night will feel safe. It is noted in the CPMP that there is a 24/7 on-site staff presence in the management office – this could potentially be combined with the cycle hub role in order for economies of scale to be realised in the new development layout;
  - The security control between the street and the Bike Hub is not sufficient, there is only one door and therefore tail-gating would be all too easy. Users will lose confidence in the store if security is breached and bikes will end up on balconies;

Access for retail staff as well as residents, with different types / delineated areas of cycle parking for each user group (see comments below);

The cycle parking provision needs to be of high quality within the hub – for example well-spaced ‘sheffield’ type stands works well for employer parking, but enclosed cycle stores/lockers provide much greater security for residential use. If they are in the form of stores then they can be used for other things (as mentioned above) which can be more attractive for residents, but would mean that they could be rented out. Other recent developments e.g. 43-61 Windsor Road mixed use development (hotel, flats and commercial space) has provided a mix of ‘sheffield’ type racks and cycle stores (2m x1m) for residents and some additional lockers provided for the hotel staff.

For the staff and employees who work in the Queensmere/Observatory shopping centres there is a need to provide them with long stay secure cycle parking. These users will require slightly different facilities. They will want showers, changing facilities, clothes lockers, drying facilities ;

- Provision of changing / showering / drying and clothes storage areas – this could be in the form of a gym located at the same site, which retail staff / residents have free access to – this is subject to innovative interpretation as to what the developer thinks will work well here – e.g. a manned facility with showers / changing, or a gym located adjacent to the bike stands, which would have regular paid members, and the users of the bike hub would be able to use the facilities too.

Provision of cycle maintenance facilities – a communal bike pump (NB a sturdy public-style communal pump rather than a standard one which could easily be stolen from the area. There are several types of public bike pump of this nature available), and a communal repair facility with a bike stand as well as bike repair tools – again there are several of these facilities available on the market and this is increasingly becoming best practice as part of new developments and even on-street in many areas. This will provide residents / retail staff with an extra incentive to cycle as they will be kept ‘on the road’ with these facilities rather than facing a maintenance issue and not being able to resolve it.

- It is proposed that a cycle washing area and facilities to wash bikes will be provided and whilst this is welcomed it needs to be incorporated with other facilities as identified above;

As the hub is located at the eastern end of the development then it may not serve the residential blocks particularly well as the cycle parking will be located too far from residential entrances. That is why the tenant storage cages if sufficiently large can also provide an alternative solution;

Clarification on when the bike hub will be available is required.

These issues have been considered and addressed by the developers.

### **Refuse /Recycling**

It is unclear where the residential bin stores are each block. These should be within 30m of the main flat entrance. Further clarification is required on the distances between blocks and the refuse/recycling stores. From the submitted drawings it would appear that residential collection of waste will be collected from both the service deck and the ground floor.

### **Servicing Management Plan**

The number of service vehicles servicing the Queensmere Shopping Centre per day are between 50 and 100 movements. Approximately 25% of these are by vehicles over 7.5 tonnes, with the remainder being under 7.5 tonnes. These figures do not include the Observatory service area. The proposed commercial development will lead to an increase in service vehicle movements by 21 of which 5 will be articulated HGVs. The residential development is estimated to generate a further 24 daily trips.

### **Taxis**

The proposed modifications to Queensmere Road will lead to the loss of 3 taxi bays And the loss of the private hire office and drop off location. A telephone discussion has been held between the local highway authority and the Taxi Federation Representative regarding the bays on Queensmere Road and the Federation Representative was keen that these bays would be re-provided in an alternative location. The local highway authority has recently undergone consultation with the taxi federation to update locations for taxi bays in the town centre and it is difficult to identify an alternative location. The local highway authority would not be willing to accept the provision of new bay on Wellington Street for example as this would impact on the free flow of traffic or the enforcement of the bus lane, which taxis are not able to use. In order to support the removal of the bay, the developer should undertake a CCTV survey to determine how frequently the bays are used. This survey should cover a weekday and a Saturday and be undertaken for a 24 hour period. This would demonstrate the value of the existing bays, if they are not currently being used then there is a stronger case for removing the bays.

In terms of the private hire provision it is recommended that this either undertaken in the car park or on the service deck and further plans / explanation as how this will be addressed.

### **Travel Plan**

#### Introduction / site characteristics and accessibility

The site is introduced well, with all key site information given including information on the proposed development, phasing of the development, opening times of retail units, number of car parking and cycle parking spaces. The entire residential site will be private rented. Only 102 residents parking bays will be provided, plus 4 car club spaces and 5 disabled spaces. It is recommended that the number of car club bays is increased incrementally above the 4 proposed, in line with the development phasing. There are also different references within the application documentation relating to the number of car club vehicles / bays and this needs to be clarified.

The site accessibility section details access to the site by all modes. A bicycle hub will also be included as part of the development, this is welcomed.

#### Baseline travel information

No baseline travel information has been provided within the travel plan, this must be included from the Transport Assessment, or another source e.g. Census 2011 data, in order to provide an indication of likely travel behaviour at the site (for all land uses).

#### Objectives and benefits

The aims, objectives and benefits of the TP are noted, these are acceptable.

#### Targets

Targets are set out for the residential and commercial development. These do not show the context of the TRICS trip generation from the TA and so this baseline is needed before the targets can be properly assessed. Targets must be revised.

Targets show a general reduction in SOV and increases in sustainable modes (including working from home) which are welcomed. It is noted that the targets are interim and will be finalised once the development is complete. There is a concern with this approach, the travel plan will need to be re-submitted at the end of each phase of development as there is a risk that some phases of the development may never be built out, which would mean that the travel plan may never be submitted.

#### Measures

A range of measures are detailed, including cycle to work schemes, cycle parking, cycle route information on display, welcome packs, £100 travel vouchers (bus or cycle), personalised travel planning, bike hub, real time bus information screens. Whilst the measures are broadly welcomed they do raise a number of concerns:

- Personalised travel planning (PTP) – is offered on the basis of being requested only. It is proposed as a reactive service rather than a proactive service. PTP has had some success when people have knocked on people's doors and have spent time engaging with them. Experience of request only PTP is that there are very few requests and therefore this measure is not very genuine and unlikely to achieve very much in its proposed form. It is also noted that the travel plan coordinator is tasked with this measure, but their proposed time allowance is very small for undertaking the whole role so in reality there will be very little of any time available to spend on PTP;
  - The way forward on this measure would be to agree a costed specification of what PTP would entail for this development or alternatively agree a sum with the local highway authority to undertake this service on the developers behalf;
- Public transport or cycle vouchers – experience from other developments in Slough is that the take up of these offers is low (often less than 10%, if indeed they are ever implemented), as they are only available to the first occupier of the flat, if that occupier does not take up the offer then the offer is withdrawn. Whilst £67,500 sounds like a significant sum, the actual cost of the measure is likely to be very much smaller particularly either by design or accident some of these offers can be difficult to redeem, which reduces take up;
- Residents will be excluded from applying for on-street residential parking permits. This must be clearly communicated to residents as part of the marketing process, tenancy agreement and welcome pack;
- The welcome packs will need to be submitted to the local highway authority for approval for distribution so as the quality of the output can be checked and where necessary improvements will be requested;
- Erecting community notice boards, with real-time bus display screens at prominent

points within the development such as at the main entrances. Whilst this is welcomed there needs to be more detail to the number of screens that will be provided as there are at least 5 main entrances to the shopping centre and then 6 main entrances to the residential blocks excluding bike hub so at circa £5,000 each then this cost will need to be budgeted for.

- It may be better to agree a sum with the local highway authority to implement real time screens at bus stops in close proximity to the development and install a couple of other screens in main entrance locations. The specification of the screens to be located within the centre will need to be agreed with the local highway authority to ensure that they are anti-reflections screens as this cannot significantly limit their effectiveness.

### Car Club

A car club is proposed, with Co-wheels, where vehicles will be provided and the first two years' membership fee for residents covered by the developer. The provision of membership must cover at least three years as this is the standard for developments in Slough. This needs committing to by the developer and secured as part of the S106 agreement.

In terms of the provision of car club vehicles, there are different numbers quoted within the travel plan document, car park management plan (CPMP) and elsewhere in the application. The number varies from 4 to 6, but in the TP the wording is as such that they will guarantee 2 vehicles, with the first would be available on first occupation and the second after 20 units are occupied. Thereafter a further 2 vehicles will be provided subject to the level of demand. However the total cost commitment to the developer is said to be circa £55,000, which would suggest that this would only cover the cost of one vehicle. As it costs:

- £17,513 for year 1 costs including the cost of the vehicle, £2,538 for Year 2 and the same amount for Year 3 which equals £22,589;
- The marketing development time cost and production of marketing materials is £650 per year per vehicle;
- The membership incentive entitles the occupier to free £25 membership + free £25 driving credit and this costs £5,000 per 100 units so for 675 units then this would cost £33,750. It's not clear whether this is an annual membership fee or for the three year period. Assuming it is for three years then the total cost would be £58,289 for one vehicle for three years for 675 flats. The proposal makes no assumptions on revenue generated by the club, which one might have expected to be included within the proposal, but it is not, so it is difficult to see how the outlay of £55,000 would pay for up to 6 vehicles.

Front-loading of the car club provision is recommended in order to get the critical mass of usage from the outset as opposed to new residents getting into their travel habits by the time all the car club vehicles are on site. The car club must be committed to at the development for at least the life of the travel plan, this is not currently the case, as noted above the residential membership needs to be paid for 3 years from occupation for each unit.

Marketing and promotion measures must accompany the car club from the outset of occupation (earlier if possible, via tenant information etc) in order that this facility is fully utilised by residents and that they are fully aware of what the car club is, where it is on the site and how it operates.

### Travel Plan Coordinator (TPC) and Management Support

A TPC role is committed to, and it is stated that this is likely to be the consultant who wrote the travel plan in conjunction with an employee from the shopping centre. However the cost of the TPC role is stated to be £3,000 per year this clearly indicates that very little time will be spent on all of the tasks. As a consultant will be employed then the TPC will only have

6-8 days a year to do all of the tasks. This is likely to have a negative impact on the quality of the output. The reality is that the budget allocated to the TPC role will need to be increased.

The handover process for inducting the new TPC to the travel plan and its requirements must be noted. Without a smooth and clear handover process, there is the danger of the travel plan not being implemented as intended.

A steering group will be set up for the travel plan, this will meet every 6 months and will include representatives from both elements of the development.

#### Monitoring and reporting strategy

It is noted that the travel plan surveys will be TRICS SAM compliant and funded by the developer. It is not noted when the surveys will take place. We require TRICS SAM surveys to take place at 1, 3, 5, 7 and 9 years from initial occupation of the site ('Year 1' being within 6 months of first occupation) or alternatively the interim surveys may fall better at the end of each stage of development. Further discussion should be undertaken in this respect and then the TP amended as the survey dates will be set out in the S106 agreement. It would be prudent for the developer to get a cost estimate from TRICS at this point in order to get an understanding of the SAM survey costs. It is difficult to see how the survey could be conducted without surveying the whole of the shopping centre.

In terms of the travel plan review, it is noted that reviews will be undertaken after completion of each phase of the development and thereafter annually after full completion for 5 years. This is acceptable.

It is noted that remedial measures will be implemented should travel plan targets not be met.

#### Action Plan

An action plan is not provided and needs to be included, covering implementation of measures, monitoring and review points, funding, and setting of targets.

#### **S106 /S278 Agreement**

The applicant will need to enter into a section 106 agreement with Slough Borough Council, this s106 agreement will obligate the developer to enter into a section 278 agreement for the satisfactory implementation of the works identified in the highways schedule and for the collection of the contributions schedule.

The highways schedule includes:

- Temporary access point;
- Installation of junction;
- Reconstruct the footway fronting the application site using Heart of Slough materials;
- Reinstatement of redundant access points to standard to footway construction;
- Installation of street lighting modifications;
- Drainage connections;
- Sign and lining changes (as necessary);
- Construction and dedication as highway maintainable at the public expense, free of charge, the access road associated infrastructure and turning area(s);
- Construction of the SBC promoted T-junction layout as shown in Drawing TSP/SSC/P2209/70;
- Construction of the right turn lane and toucan crossing at Wexham Road as shown in Drawing TSP/SSC/P2209/69;
- Works to stop up part of Queensmere Road;
- Construction of the site access arrangements as set out in TSP/SSC/P2209/73;
- Removal of the redundant carriageway and footway infrastructure following

- implementation of the new signalised junction;
- Removal of the subway ramps and subway structure at the Queensmere roundabout;

The transport schedule:

- Variable Message Signing Scheme on approach to development on A4 Wellington Street (including minimum of two VMS signs) and VMS signs on Queensmere Road leading to the car parks advising which car parks have spaces available;
- Real time passenger information screens (no. and location to be agreed);
- Electric charging bays in both Queensmere and Observatory car park (see further guidance from IAQM);
- Car Club vehicles no. and phasing to be agreed, specification of vehicles to be agreed in terms of low emission standard);
- Commitment to funding car club vehicles until at least development is fully built out;
- Car Club membership free for three years for all occupiers;
- Personalised Travel Planning contribution (further discussion);
- Welcome Pack (to be approved by the local highway authority prior to distribution);
- Occupiers of the development will be ineligible to apply for parking permits in any existing or future on-street residents parking zones;
- Travel Plan (submitted document to be revised as per comments above and then appended to S106);
- Travel Plan Monitoring contributions - £12,000 in total - £6,000 for Residential and £6,000 for commercial development;
- TRICS SAM surveys for TP monitoring including survey years;
- Funding of the Travel Plan Coordinator – budget allowance commitment;
- Cycle/public transport vouchers (further discussion required);
- Reconstructed car park to be built to Park Mark Standard;
- Cycle Hub including agreed internal specification;
- £5,000 contribution to fund stopping up of redundant highway (Queensmere Road);
- Implementation of SCOOT and MOVA at the new signalised T-junction and link proposed toucan crossing at Wexham Road to the existing Uxbridge Road roundabout and the new T-junction at Queensmere Road;

### **Recommendation**

Subject to the developer resolving the outstanding issues which are set out in the comments above, together with agreeing to the S106 obligations listed above and the developer agreeing to enter into a S278 agreement to undertake the highway works I raise no highway objection. Conditions and informatives covering the following issues would also need to be included in any permission.

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### **ENVIRONMENT AGENCY**

We have **no objections** to the proposed development, subject to the inclusion of conditions in any planning permission.

### **Condition**

No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A preliminary risk assessment which has identified:
  - all previous uses;
  - potential contaminants associated with those uses;
  - a conceptual model of the site indicating sources, pathways and receptors; and
  - potentially unacceptable risks arising from contamination at the site.



2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.  
Cont/d.. 2

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

**Reason** This site is underlain by the Langley Silt Formation (Unproductive Stratum) over the Taplow Gravel Member (Principal Aquifer). The solid geology under the site is the Lambeth Group (Secondary A Aquifer) which lies over the Chalk (Principal Aquifer). We need to protect these aquifers from any potential contamination which might be mobilised during construction.

The Langley Silt may have offered protection to the underlying aquifers from historic contamination that may be in the soils as a result of previously contaminative use. This development is for a mixture of retail and residential, therefore care needs to be taken to avoid piling through contaminated parts of the site and avoid creating pollution pathways. Since over time this site has undergone different stages of redevelopment, the silt stratum may have already been breached and we need to know if this has already caused pollutants to migrate into the Principal Aquifer.

We have reviewed the Soil Environmental Services Ltd, Contaminated Land Risk Assessment, Desk Top Study and Site Walkover Survey dated June 2012. This study covers a much wider area than this application site. However our searches on 'Old Maps' suggest that the Former Gas Works is further to the South-West than indicated on Drawing No 1 supplied in this Desk Top Study. The Gas Works was located on the eastern side of Chandos Street, which was a continuation of Park Street. This means that part of the Gas Works is located within the red outline of this particular application. This anomaly needs to be addressed.

We agree with Soils Environmental Services that further investigation is needed on this site. To assess if groundwater quality has been impacted, we would initially like to see results of groundwater analysis for the gravel deposits encountered under the site. In particular groundwater analysis should include determinants associated with the Gas Works and the Embrocation Works.

### **Condition**

No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

**Reason** Whilst currently the Langley Silt may offer protection to the underlying aquifers from historic contamination that is likely to be in the soils as a result of previously

contaminative use, disturbance during construction and the use of deep penetrative foundations may cause pathways for contamination to migrate vertically. Under the Langley Silt is the Taplow Gravel Member (Principal Aquifer) and at depth the solid geology is the Chalk (Principal Aquifer). We need to protect the aquifers under the site from any potential contamination which might be mobilised during construction.

**Condition**

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

**Reason** There is the potential for piling to form pathways for contaminants (associated with the former Gas Works and the Embrocation Works to migrate from the soils on site through the gravel aquifer to the Chalk aquifer under this site. We therefore need to establish the contaminative status of this parcel of land in order to ensure that foundation design does not create vertical pathways.

**Condition** The development hereby permitted shall not be commenced until such time as a scheme to dispose of surface water that should ensure that soakaways are not constructed into contaminated land has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

**Reason** The previous use of the site is potentially contaminative. We need to insure that surface water drainage systems will not discharge through contaminated land.

**Advice to LPA and applicant**

Sewage discharge

All sewage or trade effluent should be discharged to the foul sewer if available, subject to the approval of Thames Water or its sewerage agent.

Surface Water Flood Risk

The proposed development is located in Flood Zone 1 (low probability) based on our Flood Zone map. Whilst development may be appropriate in Flood Zone 1, Paragraph 103, footnote 20, of National Planning Policy Framework (NPPF) sets out a Flood Risk Assessment (FRA) should be submitted for all developments over one hectare in size. We note an FRA has been submitted in support of the proposed development.

The West Thames Area are operating a risk based approach to planning consultations. As the site lies in Flood Zone 1 and is between 1 and 5 hectares we will not make a bespoke response on surface water. The following standing advice is provided as a substantive response to you. If this advice is used to refuse a planning application, we would be prepared to support you at any subsequent appeal.

In order for the development to be acceptable in flood risk terms we would advise the following:

- Surface water run-off should not increase flood risk to the development or third parties. This should be done by using Sustainable Drainage Systems (SuDS) to attenuate to at least pre-development run-off rates and volumes or where possible achieving betterment in the surface water run-off regime. (The applicant should contact Local Authority Drainage Departments where relevant for information on surface water flooding.)
- An allowance for climate change needs to be incorporated, which means adding an extra amount to peak rainfall, as described in Paragraph 68, part 4, (Reference ID: 7-068-20140306) of the Planning Practice Guidance. Further guidance can be found on our website at the following [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/296964/LIT\\_8496\\_5306da.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296964/LIT_8496_5306da.pdf)

- The residual risk of flooding needs to be addressed should any drainage features fail or if they are subjected to an extreme flood event. Overland flow routes should not put people and property at unacceptable risk. This could include measures to manage residual risk such as raising ground or floor levels where appropriate.

### 3.0

#### **ROYAL BOROUGH OF WINDSOR AND MAIDENHEAD**

The building heights proposed in this application will drastically alter the skyline visible from Windsor Castle. In relation to Windsor Castle and Home Park, the Heritage Impact Statement submitted by the applicant indicates that: “The proposal would be sited some 3 km away. It would be visible in skyline views from the sensitive North Terrace and the Great Windsor Park. It would rise above the existing horizon and would result in a new skyline for the Town. The colour and articulation of the central three towers are likely to have an unusual blank presence on the horizon. The proposal will result in significant adverse impact.”

The submitted Visual Impact Assessment Document considers that the proposals would have a significant adverse impact from North Terrace and a Moderate adverse impact from Copper Horse. Mitigation is described as ‘articulation of gable façades of central three towers’. Whilst there are a number of tall buildings in the Slough area, the magnitude of the recorded negative impact of the proposals on views from Windsor Castle and Home Park are considered unacceptable. This intrusion into the skyline would potentially alter and damage the character of the view from Windsor Castle and Home Park

The Council raises an objection in relation to the heights of the buildings proposed – up to 108m. This is significant and runs contrary to the principles set out in the Heart of Slough Development Brief that was adopted in 2007 and the subsequent Slough Core Strategy and Slough Site Allocations DPD. The Council therefore urges Slough Borough Council not to grant approval for this development unless it is satisfied through further consultation with English Heritage regarding significantly enhanced mitigation measures.

A further objection was received based on the resubmitted information as follows:

Based on original consultation comments, RBWM urged Slough Borough Council not to grant approval due to concerns over views from Windsor Castle North Terrace and Copper Statue respectively towards the proposed development, unless it was satisfied through further consultation with Historic English (as renamed) that significantly enhanced mitigation measures could be put in place. The amended scheme shows an increased number of storeys to the buildings. The Royal Borough of Windsor and Maidenhead would there maintain their objection to the amended scheme on the basis that the buildings would be visually prominent (owing to their height) when viewed from the North Terrace of Windsor Castle and the Copper Statue, and this would have adverse impacts in terms of visual impact as seen from Windsor Castle North Terrace and Copper Statue, and in terms of impact on the significance of the Heritage Assets (due to important views from these Heritage assets).

### 4.0

#### **HEATHROW AIRPORT**

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

##### **Submission of a Bird Hazard Management Plan**

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

*- Management of any flat/shallow pitched/green roofs associated with the development which may be attractive to nesting, roosting and “loafing” birds. The management plan shall comply with Advice Note 8 ‘Potential Bird Hazards from Building Design’ attached \* **See para below for information** \**

The Bird Hazard Management Plan shall be implemented as approved *on completion of the development* and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

**Reason:** It is necessary to manage the flat roofs in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

*The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting; roosting or loafing must be dispersed by the owner/occupier when detected or when requested by BAA Airside Operations staff. In some instances it may be necessary to contact BAA Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.*

*The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.*

We, therefore, have no aerodrome safeguarding objection to this proposal, provided that the above condition is applied to any planning permission.

## 5.0 **ENVIRONMENTAL PROTECTION**

Referring to the Noise Assessment provided by Hawkins Environmental it is understood that the site currently resides in Noise Exposure Category B and C as defined by PPG24. Whilst this guidance has been withdrawn there is no alternative suitable guidance published detailing the relationship between a noise environment and domestic redevelopment. Noise Category C indicates that planning permission should not normally be granted.

The use of specialist acoustic double glazing can be used to achieve a ‘good internal acoustic environment’ (British Standard BS8233) but this would only provide for an effective environment if the windows were not opened and fresh air was pumped through a central system. This is not considered to be a suitable solution and therefore the development should be reconsidered.

In essence we are placing people into an environment that is considered to be too noisy. In order to live in such an area we are going to be forcing those residents to live behind closed windows and to have no access to fresh air, other than that provided centrally through a pumped system. It is the removal of the element of choice that makes the scheme unacceptable in the view of the Neighbourhood Enforcement Team. The occupiers of the flats will be unable to achieve a good acoustic environment within the flats unless they seal themselves in to an artificially created environment.

If planning permission is granted then the following conditions should be considered

1. The internal noise environment should achieve the 'good' standard, for both daytime and night time noise, as defined by British Standard BSBS8233 as a minimum. Where such a solution involves the use of centralised equipment then this shall be maintained in perpetuity.
2. Any plant or machinery installed for the domestic or non-domestic properties shall be so sited or screened so that there is no increase in background noise as determined by BS4142, when measured at the nearest residential property.
3. There shall be no deliveries taking place between 23:00 and 07:00 where the noise from such deliveries is likely to cause disturbance to residential properties.
4. Suitable and sufficient bin stores shall be provided for the exclusive use of the domestic properties. These shall be secured against unauthorised entry and shall be maintained in a clean and pest free state.

## 6.0

### **CONTAMINATED LAND OFFICER**

- Section 5 of the CLRA report concludes that there are still uncertainties regarding the extent of potential contamination at site and recommends a Phase 2 Site Investigation and Survey to be carried out (also stated in Section 6.3.1 of the EIA). Therefore, based on the above, the following conditions should be placed on the planning permission relating to land contamination:

- *Phase 2 Intrusive Investigation Method Statement*

*Development works shall not commence until an Intrusive Investigation Method Statement (IIMS) has been submitted to and approved in writing by the Local Planning Authority. The IIMS shall be prepared in accordance with current guidance, standards and approved Codes of Practice including, but not limited to, BS5930, BS10175, CIRIA 665 and BS8576. The IIMS shall include, as a minimum, a position statement on the available and previously completed site investigation information, a rationale for the further site investigation required, including details of locations of such investigations, details of the methodologies, sampling and monitoring proposed.*

*REASON: To ensure that the type, nature and extent of contamination present, and the risks to receptors are adequately characterised, and to inform any remediation strategy proposal and in accordance with Policy 8 of the Core Strategy 2008.*

- *Phase 3 Quantitative Risk Assessment and Site Specific Remediation Strategy*

*Development works shall not commence until a quantitative risk assessment has been prepared for the site, based on the findings of the intrusive investigation. The risk assessment shall be prepared in accordance with the Contaminated Land report Model Procedure (CLR11) and Contaminated Land Exposure Assessment (CLEA) framework, and other relevant current guidance. This must first be submitted to and approved in writing by the Local Planning Authority and shall as a minimum, contain, but not limited to, details of any additional site investigation undertaken with a full review and update of the preliminary Conceptual Site Model (CSM) (prepared as part of the Phase 1 Desk Study), details of the assessment criteria selected for the risk assessment, their derivation and justification for use in the assessment, the findings of the assessment and recommendations for further works. Should the risk assessment identify the need for*

*remediation, then details of the proposed remediation strategy shall be submitted in writing to and approved by the Local Planning Authority. The Site Specific Remediation Strategy (SSRS) shall include, as a minimum, but not limited to, details of the precise location of the remediation works and/or monitoring proposed, including earth movements, licensing and regulatory liaison, health, safety and environmental controls, and any validation requirements.*

*REASON: To ensure that potential risks from land contamination are adequately assessed and remediation works are adequately carried out, to safeguard the environment and to ensure that the development is suitable for the proposed use and in accordance with Policy 8 of the Core Strategy 2008.*

○ *Remediation Validation*

*No development within or adjacent to any area(s) subject to remediation works carried out pursuant to the Phase 3 Quantitative Risk Assessment and Site Specific Remediation Strategy condition shall be occupied until a full validation report for the purposes of human health protection has been submitted to and approved in writing by the Local Planning Authority. The report shall include details of the implementation of the remedial strategy and any contingency plan works approved pursuant to the Site Specific Remediation Strategy condition above. In the event that gas and/or vapour protection measures are specified by the remedial strategy, the report shall include written confirmation from a Building Control Regulator that all such measures have been implemented.*

*REASON: To ensure that remediation work is adequately validated and recorded, in the interest of safeguarding public health and in accordance with Policy 8 of the Core Strategy 2008.*

- Section 6.5.1 of EIA mentions piling was advised to be employed as part of foundations construction. This includes percussive piling and some locations with bored piling (details to be confirmed at detailed design stage). Based on the drawings submitted with the application, it appears that piling will be used to support the proposed the multi-storeys buildings. However, before this is carried out a Piling Risk Assessment will be required in order to assess the possible soil and groundwater contamination by direct contact, vapour, lateral and downward migration. This will have to be submitted to and approved by the Environment Agency.
- Section 6.5.1 of the EIA suggest that no basement excavation will take place; however Section 6.14.5 of the same report states that where feasible excavated soil will be re-used at the site for soft landscaping. Given that the applicant proposes to reuse excavated material, a detailed Materials Management Plan (MMP) needs to be submitted in writing to and approved by Slough Borough Council prior to the commencement of works. This shall be done in accordance with CL:AIRE – The Definition of Waste: Development Industry Code of Practice. This is to ensure that the material excavated is adequately characterised prior to reuse and chemically validated to demonstrate it is fit for the proposed end use (soft landscaping in a mixed residential and commercial development). This requirement will tie in with the planning condition related to CLRA and validation reporting (see above).
- Section 4, Table 4.5 of SWMP makes reference to part of the soil arisings being re-used offsite, however a few paragraphs later indication is made that where possible these will be used on site. Can the applicant please clarify if any excavated materials will be re-used on site? If so, then please see above conditions and requirements regarding validation and demonstrating these are fit

for proposed land use. It is acknowledged that at this stage (conceptual design) these details may not be available/finalised. However, these details will need to be provided to SBC once they become available. This ties in with the above comment regarding a Materials Management Plan (MMP) Potentially being required as part of the works.

## 7.0 **DRAINAGE ENGINEER**

Whilst it would be impossible to require a reduction of surface water flow from the site to the 20l/ha/sec expected of redevelopment some reduction measures should be requested.

The increase in domestic foul sewage will be significant. I'm aware of historic problems with the existing drainage system in Queensmere and would ask for evidence that any parts of the existing system to be utilised are of adequate capacity and condition to accept the increased flows. Thames Water must be consulted regarding the capacity of their system to receive the increased flows and how connections are to be made.

## 8.0 **HERITAGE CONSULTANT**

Queensmere shopping centre developed in to the town centre of Slough during the 1960's and 1970's, it is of no particular merit and its redevelopment will provide an improved frontage to Wellington Street and be a landmark development in the town.

The development will be considerably higher than the existing, with five tall towers, changing the skyline of the town. This increase in height has the potential to affect the setting of designated and non-designated heritage assets within the town. A Heritage Impact Assessment has been produced as part of the application.

There are two listed buildings sited directly adjacent to the site, to its west – the Church of Our Lady Immaculate and St. Ethelbert and its associated Presbytery (both grade II listed); their setting will potentially be affected by the development. The proposed development in the area closest to the church will be higher than the existing, but at five storeys it should not overwhelm the church and it will also be of an improved design. If the existing landscaping is retained and improved the impact upon the setting of the church and presbytery is considered to be neutral.

There are other statutory listed buildings locally but their setting is not considered to be directly harmed by the proposed development.

The core of Slough town centre is adjacent to the site; it is not a conservation area but its High Street features some 'locally listed' buildings which contribute to the character and appearance of the area. The scale of these buildings is generally 2 / 3 storeys so the taller development proposed (some of the development within the 5 towers is to be 19 storeys) is likely to have an impact upon this High Street area and the setting of the locally listed buildings within.

The Heritage Impact Assessment also refers to the impact of the site upon views from Windsor Castle; it may be advisable to obtain advice from English Heritage on this aspect of the proposal due to the particular significance of Windsor Castle and its surrounding landscape.

In terms of design the redevelopment of the shopping centre should greatly improve its visual appearance, particularly its relationship with Wellington Street. The use of glazing and good quality materials should ensure a good external appearance to the development. The use of colour, which can be a positive feature of new development, will need to be carefully considered. The way the development will look at night is a further consideration.

The re-development of the Queensmere Shopping Centre in Slough is generally considered to have a neutral impact upon the setting of the adjacent grade II listed buildings. Any harm to other heritage assets (designated or non-designated) is generally outweighed by the significant public benefit the scheme will bring to the area. As referred to above it may be advisable to seek the view of English Heritage regarding any impact upon Windsor Castle and its historic landscape.

## 9.0 **THAMES WATER**

### Waste Comments

Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services to discuss the details of the piling method statement.

Thames Water requests that the applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.



Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.

#### Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

#### Supplementary Comments

A drainage strategy for the foul and surface water elements of the development will be required. An impact study will also be required to assess the impact of the foul water discharge on the local network. The developer must prove that their surface water discharge rates will not exceed existing rates.

#### 10.0 **SOUTHERN ELECTRIC**

No response has been received. Members will be updated via the amendment sheet should any response be received.

#### 11.0 **HIGHWAYS AGENCY**

The Secretary of State for Transport offers no objection.

#### 12.0 **NATIONAL GRID**

No response has been received. Members will be updated via the amendment sheet should any response be received.

#### 13.0 **TRANSCO**

No response has been received. Members will be updated via the amendment sheet

should any response be received.

#### 14.0 **NATURAL ENGLAND**

Whilst Natural England advises your authority that the proposal, if undertaken in strict accordance with the details submitted, is not likely to have a significant effect on the interest features for which Burnham Beeches Special Area of Conservation (SAC) has been classified, we note that this application has not considered a Likely Significant Effect on its features. In undertaking your duty under the requirements of the Conservation of Habitats and Species (Amendment) Regulations 2012, the competent authority would need to be satisfied that this proposal can conclude no Likely Significant Effect prior to the determination of the application.<sup>1</sup>

##### **Other advice**

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and ☐ species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application.

If the LPA is aware of, or representations from other parties highlight the possible presence of a protected or Biodiversity Action Plan (BAP) species on the site, the authority should request survey information from the applicant before determining the application. The Government has provided advice<sup>2</sup> on BAP and protected species and their consideration in the planning system.

Natural England Standing Advice for Protected Species is available on our website to help local planning authorities better understand the impact of development on protected or BAP species should they be identified as an issue at particular developments. This also sets out when, following receipt of survey information, the authority should undertake further consultation with Natural England.

##### **Biodiversity enhancements**

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *‘Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’*. Section 40(3) of the same Act also states that *‘conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat’*.

#### 15.0 **SLOUGH RETAILERS GROUP**

No response has been received. Members will be updated via the amendment sheet should any response be received.

16.0 **ENGLISH HERITAGE**

We do not wish to offer any comments on this occasion. The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

17.0 **TENNANTS RESIDENTS ASSOCIATION**

No response has been received. Members will be updated via the amendment sheet should any response be received.

18.0 **BERKSHIRE ARCHAEOLOGY**

Following analysis of the Archaeological Desk Based Assessment included with the Environmental Impact Assessment for this project, it is our conclusion that there are potential archaeological implications with this project. Although the impact assessment is thorough we consider that there is not currently sufficient detail on construction techniques available at the present time to confidently assess the impact of the development upon any surviving archaeological deposits. Furthermore, ongoing reappraisal of the archaeology of the area (particularly in relation to the Heart of Slough redevelopment) has demonstrated that the area to have archaeological potential, our understanding of which remains to be refined through field evaluation.

Therefore I recommend that a condition requiring an archaeological investigation is attached to any planning permission granted, to mitigate the impact of the development, as follows:

**Condition:**

No development shall take place until the applicant or their agents or successors in title have secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, which has been submitted by the applicant and approved by the planning authority.

**Reason:**

Archaeological work is required as a precautionary measure to mitigate the impact of development on any surviving yet hitherto unknown heritage assets which may be present on the site, in line with local and national planning policy.

The exact nature and scope of this work will be dependant upon the construction techniques employed and be set against the ongoing reappraisal of the archaeological potential of central Slough. The results of this appraisal may highlight specific research questions or lower our assessment of the archaeological potential of the area. Therefore we invite the applicant's archaeological consultant to liaise with us to determine the most effective course of action to ensure the mitigation of any archaeological impact through preservation by record.

19.0 **THAMES VALLEY POLICE**

There are no police objections to this application but comments regarding crime prevention and community safety are below:

**Main Access Control** - The communal entrances to blocks of flats should form a line of defence acting as a physical barrier to access for outsiders and all five blocks should be

fitted with an access control system with an electronic lock release with entry phone and video verification linked to the flats. Communal door entry systems prevent casual intrusion by offenders into the block, where they can break into unoccupied flats during the day without being seen and also act as a line of defence against bogus callers.

The method of mail delivery must be designed in from the start and this can be problematic with large numbers of flats. **Tradesman buttons are no longer acceptable and must not be used.** Royal Mail require them to operate until at least 2pm which in the town centre would be disastrous and on no account should be fitted. Mail boxes can be either positioned through the wall on the main entrance or be situated in the main lobby and a fob be given to the local Royal Mail sorting office for access.

**Defensible Space Within Block** - With this amount of flats in high rise blocks there should be some control over access between floors. It should not be possible, once in the block, to access all floors. There is no need for this and it actively encourages crime and anti social behavior.

Access control systems can limit the levels of access that is permissible e.g. a resident on the first floor should not have access up to the nineteenth floor. This will provide residents with some defensible space and allows them to take control of their floor. There are examples of flatted blocks nearby in Slough that have continuous crime and anti social behaviour problems where access is uncontrolled throughout the block. So much so that expensive retrofitted CCTV and manned guarding have had to be implemented to try and reduce the anti social and criminal behaviour.

Crime is always easier to commit where offenders are not recognised as strangers. Consequently, they will take opportunities to offend where they are likely to benefit from this anonymity. People expect to see strangers in what in effect will become semi public space, so there is a natural tendency to ignore them, providing the offender with the anonymity, and the opportunity, to commit offences. In semi public spaces, everyone has a legitimate excuse to be there, and wrongdoers become indistinguishable from legitimate users. Because of this, many people are less inclined or able to recognise problems or, more significantly, to intervene when they occur. It is much easier to ignore anti-social behaviour in public areas over which individuals have little control than in more private areas.

Ideally each floor should have its own access controlled doors but there should at least be some control every few floors. This will encourage residents to take control of their own corridors and act as capable guardians.

**Public Viewing Platform** – I cannot find any indication in the application as to how access to this public viewing platform is to be controlled. Whatever means of access is finally decided it must not compromise the security and safety of the residents.

**Secured by Design Standards** – All communal entry doors to blocks and individual flat entry doors should be to BS PAS 24 standard. This is the minimum entry level for security tested doors. These standards should also apply to the commercial element of this block and all exterior glazing should include a laminate pane.

If the development committed to achieving at least Part Two of the Secured by Design Award most of the above points would be covered.

**CCTV** - There is no mention in this application of any consideration to install any extra public, or private CCTV cameras. If this application is permitted then there will be a large increase in activity in the town centre. This will include night time economy activity and as such care should be taken that vulnerable areas such as the communal residential entrances to the blocks should be covered by public CCTV.

I would also recommend that CCTV be installed within the residential blocks. Unfortunately due to the high number of residential flats, there is a strong potential for offenders to be living within the development. Other large flatted developments have suffered anti social behavior, drug dealing along corridors / gathering points such as stair wells, and ground floor entrance areas. Also if the post delivery is via a post box system for each flat by the main entrances, these can be targeted for criminal damage and theft. The areas that should be covered are the communal post boxes inside the main entrances; inside ground floor entrances and communal hallways at ground level; ground level stair/lift core areas and cycle storage as a minimum.

#### 20.0 **ARQIVA TELEVISION TRANSMISSION**

Arqiva is responsible for providing the BBC and ITV's transmission network and is responsible for ensuring the integrity of Re-Broadcast Links. We have considered whether this development is likely to have an adverse effect on our operations and have concluded that we have no objection to this application.

#### 21.0 **TREE MANAGEMENT OFFICER**

No response has been received. Members will be updated via the amendment sheet should any response be received.

#### 22.0 **AIR QUALITY**

The site is located within the Town Centre Air Quality Management Area 4 (declared in 2011). The local environment experiences breached of the UK Air Quality Objective for nitrogen dioxide (NO<sub>2</sub>). This objective should have been achieved by 31 December 2005. The cause of poor air quality is mainly due to road traffic emissions.

This development, whilst not leading to any substantial change in parking provision and will lead to a slight increase in trip generations, according to the latest transport assessment (Stilwell Partnership June 2015) 134 vehicle trips midweek AM peak and 147 in the PM peak. On Saturday lunchtime the development will be adding a maximum of 175 vehicle trips. The number of residential parking spaces has been capped at 102 spaces.

The slight increases in trip movements are due to the residential elements of the scheme, there will also be a slight increase in service vehicle movements to the new development. There will be impact on local air quality, small but as the existing air quality already breached the Air Quality Objectives these will be still be significant.

Paragraph 124 NPPF 2012 is clear the developer must be mindful of the existence of AQMAs and the Air Quality Action Plan.

*"Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan".*

The DCLG guidance supports this position and issued additional guidance in 2014. The guidance including basic information an air quality assessment should consider including the assessment of significance of an impact including during construction phase and operational phase and the where necessary acceptable mitigation measures. Examples of mitigation measures include:

- the design and layout of development to increase separation distances from sources of air pollution;

- using green infrastructure, in particular trees, to absorb dust and other pollutants;
- means of ventilation;
- promoting infrastructure to promote modes of transport with low impact on air quality;
- controlling dust and emissions from construction, operation and demolition; and
- contributing funding to measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development.

The Councils Local Development Framework Core Strategy 2006 -2026 states in Core Policy 8 :Sustainability and the Environment:

*“All development in the Borough shall be sustainable, of a high quality design, improve the quality of the environment and address the impact of climate change...section 3 Pollution – Development shall not: a) Give rise to unacceptable levels of pollution including air pollution, dust, odour, artificial light or noise.*

The Council has published an Air Quality Action Plan which was adopted by Cabinet in 2012. The Council is currently developing a Low Emission Strategy which will include an updated Air Quality Action Plan for all four of the Councils Air Quality Management Areas.

The current Air Quality Action Plan focuses on: restricting town centre car parking provision, encourages developers to design out of negative air quality impacts, requires S106 contributions towards local sustainable transport fund, improvement of management of traffic flow along A4 by investing in urban traffic management control (UTMC) and other ITC (Intelligent Transport Systems), reducing long stay car parking in the Town Centre, controlling freight movements, routes, operating times, exploring ways of improving fleet fuel efficiency performance, and promoting cleaner fleet vehicles, switch off technologies, promotion of sustainable modes of travel as alternatives to car, including promotion and provision of cycling facilities, safer crossing points, and promotion of low emission vehicles, electric charging points, and recharging points in Council car parks, and in new developments, as well as exploring the potential for future town centre residents' car club.

The new LES will supersede the existing Air Quality Action Plans and it will focus on the accelerated uptake of low emission vehicles and sustainable travel options in order to speed up intervention measures to improve air quality. It is clear air quality trends within the town centre are showing little improvement in recent years despite a number of changes, including to the highway layout, a slight reduction in traffic volumes and investment in UTMC and ITC technologies.

An air quality assessment has been undertaken as part of the Environmental Impact Statement by Hawkins Environmental Limited. The assessment has been undertaken in accordance with DEFRA Technical Guidance on Local Air Quality Management (LAQM) (TG09). In terms guidance on air quality assessment, significance impact and mitigation (including recommended best practice to reduce/minimise air quality impact) the developer should be mindful of the Institute of Air Quality Management (IAQM) (2015)*Local-Use Planning & Development Control: Planning for Air Quality*. This guidance was printed in final draft in April 2015. The consultant has used previous guidance which is now outdated.

The consultant has also considered the likely impacts of construction on the air quality of the local environment has been conducted in accordance with the IAQM (2014) *Guidance on the assessment of dust from demolition and construction*. This guidance is in date and relevant.

The consultant has considered the following pollutants hydrocarbons, nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>2.5</sub> and PM<sub>10</sub>).

Air pollution is harmful to human health. In the UK it has been estimated that the mortality burden of long term exposure to particulate matter (PM<sub>2.5</sub>) in 2008 was equivalent to nearly 29,000 premature deaths in those aged 30 or older. In 2013 Public Health England published health premature death outcome statistics due to exposure of (PM<sub>2.5</sub>). The average for England is 5.6% and for Slough it is 6.8%. Nitrogen dioxide exposure can have an adverse role in exacerbating asthma, bronchial symptoms, lung inflammation and reduced lung function.

There is a statutory duty on the Local Authority to monitor and manage local air quality. Compliance with the Town Centre AQMA is unlikely to be met before 2020 without significant intervention. This intervention will likely take the form of significant movement towards non-car use (sustainable travel options), significant cap/restraints on town centre parking provision, and significant uptake of low emission vehicles. Without this intervention air quality will remain a significant problem for the town centre and will continue to cause harm to public health.

### **Operational Air Quality Impacts**

The consultant has used Design Manual for Roads and Bridges (DMRB) methodology to predict existing and future air pollutant concentrations for the site, prediction of changes in air pollutant concentrations in the vicinity of the site as a consequence of changes in traffic flows, an assessment of the likelihood of issues relating to dust emissions during the construction phase of the project.

The consultant did not, as good practice dictates, request advice from the Environmental Quality Team, about the air quality assessment methodology as we would have expected an air quality dispersion model (ADMS-Roads or ADMA-urban) be used to assess air quality impacts at agreed receptor locations. DMRB is generally used a screening tool.

Therefore, I raise issues with the adequacy of this air quality assessment methodology and its accuracy. The consultant has already stated the model does not take account of the annualised meteorological data, height of source or receiver, potential canyon effects. The model is unable to account for queuing effects and it is unable to predict PM<sub>2.5</sub>. Additionally, the verification of the model using the DMRB is significantly under predicting the NO<sub>x</sub> levels. *I am not satisfied with the modelling used to assess air quality impacts for the scheme.*

In my opinion a detailed air quality assessment is required that takes these factors into account, and within the context of any proposed junction modifications. To assess the impact on the proposed development and existing sensitive receptors. ADMS modelling is recommended. Full validation of the model against local authority monitoring stations and diffusion tube locations will be required.

The consultant has assessed the operational impact by using guidance, including EPUK guidance document '*Development Control: Planning for Air Quality (2010)*' this guidance has now been replaced with the Institute of Air Quality Management (IAQM) (2015) *Land-Use Planning & Development Control: Planning for Air Quality*.

Once an agreed and updated air quality assessment (with proposed junction modifications) has been undertaken an assessment of the operational impact for individual receptors will need to be undertaken using IAQM (2015) Guidance *Land-Use Planning & Development Control: Planning for Air Quality*.

It is recommended that the developer on completion of the revised air quality assessment

and in line with best practice with the IAQM guidance use the HM Treasury and DEFRA IGCB damage cost approach to provide a valuation of the excess emissions, using the most currently applicable values for each pollutant over a 5 year time frame.

The developer is required to quantify the costs associated with pollutant emission from transport using IAQM guidance, HM Treasury and DEFRA IGCB damage cost approach.

This will allow the Council to define the financial commitment required for offsetting emission reductions. Such measures can include, but are not limited to:

- support and promotion of car clubs (example, a town centre electric car club)
- contributions to low emission vehicle fuelling infrastructure (both on street and car parks)
- provision of incentives for the uptake of low emission vehicles (such as free or reduced cost of parking)
- financial support to low emission public transport options (low emission buses, taxis),
- Improvements to cycling and walking infrastructure.

The Council has already in, draft stage, developed a low emission programme for the Town Centre towards which contributions can be made.

### **Travel Plan**

It is noted the developer is proposing to set up a car club with four spaces. The operator co-wheels car club are proposing to supply 2 Toyota Aygo, 1 Toyota Yaris and 1 Toyota Auris. These vehicles emit below 100g/km CO<sub>2</sub> and will be EURO 6 compliant they are low emission vehicles. However, as the development will be installing electric charging infrastructure it is recommend that a ULEV (below 75g/KM CO<sub>2</sub>) Option such as 2015 Toyota Prius Hybrid model be considered.

The developer has also committed to installing electric charging point infrastructure within the travel plan initially proposing 10 electric charging points in Observatory car park (residential) and one electric charging space per 1000sqm of commercial floor area for the rebuilt Queensmere car park. It is advisable that public/commercial EV infrastructure is installed in both car parks.

### **Recommendations Operation Air Quality via pre-commencement conditions and s106 agreements:**

1. A detailed updated Air Quality Assessment is required to be submitted to the Local Planning Authority. The air quality assessment will need to take account of any proposed junction modifications (including the right-turn lane onto Wexham Road junction with Wellington Street). The assessment will need to assess the predicted change in air quality concentrations on the proposed development and existing sensitive receptors. The study area needs to be agreed in writing with the Local Planning Authority. The air quality assessment shall use ADMS modelling and shall include detailed model verification of the model against local authority monitoring stations and diffusion tube 2013 data sets.
2. On completion of a satisfactory Air Quality Assessment, an assessment of operational impact will need to be undertaken using IAQM (2015) Table 6.3 Guidance *Land-Use Planning & Development Control: Planning for Air Quality*.
3. The developer is required to quantify the costs associated with pollutant emission from transport using IAQM guidance, HM Treasury and DEFRA IGCB damage cost



approach.

#### Mitigation based on IAQM best practice and Travel Plan

4. The provision of one electric vehicle charger “OLEV compliant electric home charger specification” for every on-site car parking space for residential use is recommended (102 spaces). It is recommended this is phased into the development based on occupation rates/allocation of residential car parking spaces and take up of ULEV Technology. As sales of ULEV are predicted to increase to around 10-15% by 2020 then the developer proposal of 10 electric charging points in the Observatory Car park, along with infrastructure to allow for more in the future is acceptable at the completion of phase 1.
5. Additionally a ‘fast charger’ is required per 1000m<sup>2</sup> of commercial floor space. The scheme is proposing a total of 61,000m<sup>2</sup> commercial floor space (7,000m<sup>2</sup> additional floor space). This equates to 61 electric charging points being installed within the scheme. As the market take up of ULEV vehicles will be around 10% at full year of opening 2019 and there are a total of 1,314 spaces for short term residential lease, visitors to residents, shoppers and staff. This means all 61 spaces should have electric vehicle charging infrastructure in place by year of opening (2019). The charging points should be at least Type 2, Mode 3 compatible. It is advisable that the fast charging infrastructure is split between the Observatory and Queensmere car parks. It is advisable that the location and layout of these electric car spaces are included within an up to date Car Park Management Plan.
6. A detailed travel plan shall be submitted and agreed in writing and shall also include annual monitoring requirements. The plan shall sets out measures to encourage sustainable means of transport (public, cycling and walking) with target driven performance indicators for both residential and commercial uses. These shall also include targets on the promotion and uptake of ultra low emission vehicles for residents, staff and shoppers. This may for example, include measures such as subsidised charging rates or parking rates to promote ULEV cars and the rates shall be included within the ‘car park management plan framework’. The plan shall be submitted and approved by the Local Planning Authority.
7. All Service vehicles (above 3.5 tonnes) accessing the site shall be EURO VI compliant and (below 3.5 tonnes) EURO 6 compliant at full year of opening (2019). The details of service vehicles shall be included within the ‘Service Management Plan’
8. All gas-fired boilers will be required to meet a minimum standard ‘less than 40 mgNO<sub>x</sub>/kWh’.
9. A contribution is sought towards SBC low emission projects/air quality mitigation measures (offsetting emissions) based on the “damage cost approach” used by DEFRA see point 3. The final settlement sum to be agreed.

#### **Construction Air Quality Impact Assessment**

The consultant has used the 2014 IAQM guidance on the assessment of dust and demolition and construction using the risk based approach, this is acceptable methodology. The construction dust and particulate impacts are likely to be significant and potential cause of complaint and harm to residential receptors and the public if not appropriately remediated.

An assessment of risk of dust and particulate impacts has been carried out, known as a step 2 assessment and has identified the potential dust emission magnitude as large during construction phase as there will significant amount of new buildings and floor space being

developed. The assessment of dust emission magnitude for demolition is small because there is not a significant amount of demolition on the site.

The sensitivity of the area needs to be taken into account. These have deemed dust soiling at medium during demolition and construction. I am agreement with this assessment rating the sensitivity is medium as there are no more than 100 residential properties within 50m of the development.

With respect to PM<sub>10</sub> human health impacts, I would classify the area as low as the background levels are below 24 µgm<sup>3</sup>. There is potential for short term peaks associated with construction traffic and activities that will need to be mitigated.

### **Risk**

I therefore consider the risk during demolition to be low for dust, low for PM<sub>10</sub> and negligible for ecology. The site is considered low risk for demolition.

I consider the risk during construction to be medium for dust and low for PM<sub>10</sub> and negligible for ecology. The site is considered medium risk for construction.

Therefore I am agreement with the consultant's judgement of risk.

### **Mitigation**

The IAQM recommends a list of site specific mitigation measures for relevant risk ratings. I would recommend both the desirable and highly recommended mitigation measures as outlined in IAQM guidance for communication, demolition and construction are incorporated within a dust management plan.

### **Recommendations Construction Air Quality via conditions:**

10. A detailed dust management plan shall be prepared by the developer and shall include all desirable and highly recommended mitigation measures as outlined by IAQM 2014 "Guidance on the assessment of dust from demolition and construction". The plan shall be submitted and approved by the Local Planning Authority prior to the commencement on site.
11. The dust management plan shall form part of an overall Construction Environmental Management Plan (CEMP). The CEMP shall include a noise management plan (include the hours of working on site and noise limits), a dust management plan, a detailed breakdown on construction phases (project plan) and a complaints procedure.