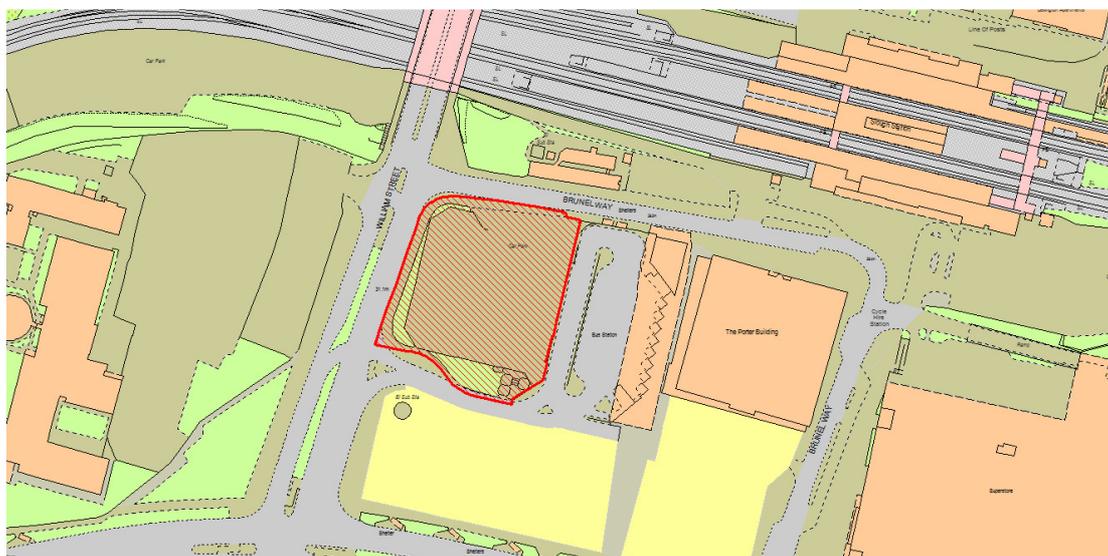


Registration Date:	14-Sep-2017	Application No:	P/04888/019
Officer:	Jenny Seaman	Ward:	Central
Applicant:	Mr. Oliver Lord, Maizelands Ltd and Aringford LTd c/o Ab	Application Type:	Major
		13 Week Date:	14 December 2017
Agent:	Mr. Mike Ibbott, TP Bennett LLP One America Street, London, SE1 0NE		
Location:	Former Octagon, Brunel Way, Slough, SL1 1QY		
Proposal:	Mixed use regeneration scheme comprising: new area of public realm/pedestrian link, build to rent (BTR) residential accommodation (343 units), a hotel (170 beds) with ancillary leisure and business facilities, retail uses (use class A1-A3), and associated basement parking.		

**Recommendation:** Delegate To Planning Manager for approval



**P/04888/019**

1.0 **SUMMARY OF RECOMMENDATION**

1.1 Having considered the relevant policies set out below, and comments that have been received from consultees and neighbouring occupiers, and all other relevant material considerations it is recommended the application be delegated to the Planning Manager

A) For approval subject to:-

- 1) the satisfactory completion of the Section 106 Agreement to secure financial contributions towards affordable housing, highways, education and air quality and viability review mechanism
- 2) finalising conditions; and any other minor changes.

B) refuse the application if resolution of the outstanding matters is not agreed by 31<sup>st</sup> March 2019.

1.2 This application is to be determined at Planning Committee as it is an application for a major development comprising more than 10 dwellings.

**PART A: BACKGROUND**

2.0 **Proposal**

2.1 This is a full planning application for a mixed use regeneration scheme comprising three buildings surrounding a proposed central public space.

2.2 Build to rent (BTR) residential accommodation (343 units) is proposed which will be located in two buildings of 18 and 26 storeys (The west tower rises to 94.5m and the east tower to 120.85m), with shared amenity facilities and centrally actively managed.

2.3 A high-quality hotel (170 beds) in one building approximately 8 storeys in height (57.8m) is proposed with ancillary leisure and business facilities which will provide additional leisure facilities for local people as well as hotel guests.

2.4 A new public square of 1,240m<sup>2</sup> is proposed to improve pedestrian connectivity between the rail and bus stations and areas to the west, notably the forthcoming redevelopment of the former Thames Valley University site which forms part of the Heart of Slough regeneration proposals. The central space allows for flexible use for events, as well as informal seating and planting areas.

2.5 Ancillary retail spaces (use class A1-A3) are proposed at ground floor level to activate the new public square. Three retail units are proposed at ground floor level in the two residential blocks.

- 2.6 Car and cycle parking is proposed. The car parking spaces will comprise 34 for the BTR dwellings and the remaining 78 for the hotel. This will be augmented by a car club.
- 2.7 Cycle parking is provided as follows:-
- 331 for the BTR dwellings
  - 10 for visitors to the BTR dwellings
  - 2 for the retail units
  - 32 for hotel staff
  - 4 for hotel visitors
- 2.8 The application is accompanied by the following documents:
- Planning Statement
  - Design and Access Statement
  - Design and Access Statement – Landscape
  - Design and Access Statement Addendum
  - Heritage, Townscape and Visual Impact Assessment
  - Archaeological Desk Based Assessment
  - Pedestrian Level Wind Microclimate Assessment
  - Report on Daylight and Sunlight
  - Air Quality Assessment
  - Noise and Vibration Assessment
  - Transport Assessment
  - Delivery and Servicing Plan
  - Draft Hotel Travel Plan
  - Draft Residential Travel Plan
  - Flood Risk Assessment
  - Surface Water Management Plan
  - Preliminary Ecological Appraisal
  - Summary Fire Strategy
  - Land Quality Statement
  - Energy Statement
  - Utilities Statement
  - Statement of Community Involvement
- 3.0 **Application Site**
- 3.1 The site is a 0.41 hectare site currently used as a temporary surface-level car park. It was formerly occupied by an office building known as The Octagon (arising from its rather unusual octagonal design) which was demolished several years ago. The site is within the Town Centre Boundary, but is not allocated within the Councils Site Allocations DPD. The site adjoins, but does not formally form part of, Slough Borough Council's Heart of Slough regeneration proposals.
- 3.2 The site is bounded to the north by Brunel Way, Slough railway station and the railway lines.
- 3.3 To the south of the site is Brunel Place which comprises two office buildings of approximately 12,000m<sup>2</sup> and 22,000m<sup>2</sup> that are currently under construction. To the south, William Street joins the Wellington Street

(A4) at a new a-grade interchange that has been delivered as part of the Heart of Slough masterplan.

- 3.4 Slough bus station is located to the east of the site. Beyond the bus station is the Porter Building, a new five-storey office development.
- 3.5 To the west is Stoke Road and beyond that the former Thames Valley University site which is part of the Heart of Slough proposals and is earmarked for mixed-use development including housing and offices.
- 3.6 The site is not within a Conservation Area, nor does it contain any listed buildings, but it is close to and visible from several Grade 2 listed buildings – the rail station (three separate list entries) and St Ethelbert's Church and Presbytery (two list entries). Windsor Castle is a Grade 1 listed building and a Scheduled Ancient Monument; the Castle features in long distance views of the application proposal.

#### 4.0 **Relevant Site History**

- 4.1 The relevant planning history for the site is set out below (planning history that has been excluded involves details to discharge conditions and adverts).

P/04888/018 - Screening opinion for redevelopment of former Octagon for a mixed use regeneration scheme comprising; a new area of public links, build to rent accommodation and a hotel with leisure and business facilities. (343 Build to Rent units, a hotel (170 beds) and ground floor A1/A3 uses. Environmental Impact Assessment not required 28 Sept 2017.

P/04888/017 - Retention of surface public car park for a further temporary period of two years (The use of the site as a temporary car park with 124 parking spaces was initially allowed on appeal on 13 November 2012 under appeal reference APP/J0530/C/12/2181980). Approved 14 April 2015.

P/04888/016 - Erection of 2 no linked office buildings (10 no floors and 8 no floors) 27,000m<sup>2</sup> of internal office floor space (Class B1a) together with access, parking and servicing. This application was reported to the Planning Committee on 17 October 2013 and it was resolved that the application be delegated to be approved following completion of s106 agreement (S106 not completed). No decision issued

P/04888/012 - Demolition of existing building and erection of two linked office buildings (10 no. floors and 8 no. floors) comprising 29,417square metres of gross external office floor space (Class B1a) together with access, parking and servicing. Approved 17 June 2008

P/04888/000 - Construction of a building of 106,399 sq. ft. (gross) comprising of 70,000 sq. ft. of offices, 1,500 sq. ft. of gymnasium and clinic, 7000 sq. ft. of plant space and 28,000 sq. ft. of car parking. Approved 01 February 1979.

4.2 There is also relevant planning history on adjoining sites which are considered material to the consideration of the current planning application given issues of size and height and these are set out below.

P/14405/00 – Heart of Slough Masterplan. This included redevelopment (outline) of four sites adjacent to the roundabout including Thames Valley University (TVU site), Brunel Bus Station, Slough Public Library and Slough Day Centre and the Church of Our Lady Immaculate and St Ethelbert to provide (amongst other things) 1,598 new dwellings, 48,708 sqm of office space, a 120 bed hotel, a new bus station and 6,085 sqm of community floor space. Approved 22 December 2009.

P/02252/009 – Brunel Bus Station (Brunel Place). This involved the redevelopment of the Brunel Bus station and public car park on Wellington Street for a phased office led mixed use development. (Two buildings 11,163 sqm and 22,233 sqm) Permitted 14 October 2009.

P/15524/000 – Slough Day Centre (The Curve). Redevelopment of the site for a new library and cultural centre. Approved 6 Sept 2013.

P/00789/028 – The Porter Building. Erection of a five storey office building. Approved 27 Jan 2016.

P/06684/015 – Queensmere Shopping Centre. Mixed development scheme for 11,533sqm of A1 Retail, Class A3 –A5 food and drink and Class D2 assembly and leisure floor space and 675 residential units. The residential element was proposed within 4 towers of between 15 and 23 storeys and a standalone tower of 15 storeys. Reported to planning committee on 26 Nov 2015 and delegated to the planning manager subject to completion of a Sec 106 (not yet completed).

P/17238/00 – Slough Central Library, 85 High Street. Mixed use development (part ten, part nine, part six and part four storey) to provide two hotels and 64 self contained units. Reported to planning committee on 4 July 2018 and delegated to the planning manager subject to completion of a Sec 106 (not yet completed).

## 5.0 **Neighbour Notification**

5.1 In accordance with Article 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) a site notice was displayed outside the site on 04/10/2017 and the application was advertised as a major application in the Slough Express. The application was subsequently advertised again in the Slough Express on 22 December 2017 on the basis that the application was a major application that would affect the setting of a Listed Building.

Neighbour letters were sent out on 02/10/17 to the following addresses:

1, 19, 19a, 19b, 19c, 21, 21a, 23, Stoke Road

London Country Bus Services Ltd, Stoke Road  
Abbey Business Centres, Access-it Software (uk) Ltd, Maple Lodge  
Property Services Ltd, Matefile Ltd, Abbey House 18-24, Stoke Road,

Slough, SL2 5AG,

10, Stoke Gardens

Jarshire Ltd, 2-4, Bristol Way, Stoke Gardens

1, Bristol Way, Stoke Gardens

Acrone Ltd, 5, Bristol Way, Stoke Gardens, Slough, SL1 3QE,

Can Build, 3, Bristol Way, Stoke Gardens, Slough, SL1 3QE,

Network Rail Ltd, Slough P S B, Bristol Way, Stoke Gardens, Slough, SL1 3QE,

Bridge Technology International Ltd, 3, Bristol Way, Stoke Gardens,

Slough, SL1 3QE, Stress Uk Ltd, 3, Bristol Way, Stoke Gardens, Slough,

SL1 3QE,

Cullen Burns Associates Ltd, Automotive House, Grays Place, Slough,  
SL2 5AF,

Roman House, Grays Place, Slough, SL2 5AF,

5b, 7, 9, 9a, Mackenzie Street, Slough

69, 69a, 71, 71a, 73, 75, Grays Road, Slough

1, 2 and 3-4 Prudential Buildings, William Street, Slough

Code, William Street, Slough, SL1 1XY,

Flat, Code, William Street, Slough, SL1 1XY,

24, 39a, 54, 55-57, 62, 66, 68, 70, 71, 72, 72a, 74, 74a, 74b, 74c, 74d,  
74e, 75-77, 76, 78-79, 80-81, 82-85, 93, Queensmere, Slough, SL1 1DG,

Flats 1, 3, 5, 7, 9, 11, 15, 17, 19, 21, 23, 25, 27, 29, 31, 33, 35, 37, 39, 41,  
43, 45, 47, 49, 51, 53, 55, 57, 59, 61, 63, 65, 67, 69, 71, 73, 75, 77, 79, 81,  
83, 85, 87, 89, 91, 93, 95, 97, 99, 101, 103, 105, 107, 109, 111, 113, 115,  
117, 119, 121, 123, 125, 127, 129, 131, 133, Flats 2, 4, 6, 8, 10, 12, 14,  
16, 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 54,  
56, 58, 60, 62, 64, 66, 68, 70, 72, 74, 76, 78, 80, 82, 84, 86, 88, 90, 92, 94,  
96, 98, 100, 102, 104, 106, 108, 110, 112, 114, 116, 118, 120, 122, 124,  
126, 128, 130, 132, 134 The Junction, Grays Place, Slough, SL2 5GE

Slough Borough Council, Slough Central Library, 85, High Street, Slough,  
SL1 1EA, Slough Drug Treatment Services, 95, High Street, Slough, SL1  
1DH, 95, 97, 99, 101, 113, 115, Flat 115, 117-117a, 119, 123, High Street,  
Slough

Beeline, Brunel Bus Station, Brunel Way, Slough,

Thames Trains Ltd, Slough Railway Station, Brunel Way, Slough

Thames Trains Ltd, Railway Terrace, Slough

Thames Trains Ltd, Station Cafe, Brunel Way, Slough

W N Thomas & Sons Ltd, Belmont Works, Stoke Gardens, Slough

St. Ethelberts Catholic Church, Wellington Street, Slough, SL1 1XU,

3, 4, 6, 7, 8, 9, 17, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43,

44, 55, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 80,

94, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113,

Rivington Apartments, Railway Terrace, Slough,

No responses have been received apart from First Beeline Buses, which is set out below.

#### First Beeline Buses

Commented as follows:-

Slough bus station is a busy facility with frequent departures to points across the Borough and beyond. It is important for the connectivity of the Borough that these bus services are able to operate on time. The use of this road for access to the hotel car park is very likely to delay buses entering and leaving the bus station.

We also have concerns that vehicles missing the left hand turn into the car park will be forced to enter the bus station, which is a hazardous environment and where reversing buses are given priority. This is likely to be lost on motorists who have gone the wrong way.

We notice that delivery vehicles will also have to approach the site in this way. It is noted that large delivery vehicles will have book a slot to make their delivery, however we would question the effectiveness of this plan. Should a truck arrive to find the bay blocked it will be forced to reverse back onto the bus station access road. This will mean (1) that buses are delayed entering and leaving the site, (2) increase the risk of collision and (3) require the truck to enter the bus station.

It is acknowledged that the plans show there will be BUS ONLY markings. However if motorists are unable or unwilling to enter the height-restricted car park or loading area they are faced with a choice of ignoring the markings or stopping whilst they consider other escape options – hence causing delays to buses.

It is not clear whether there will be other impacts on the bus station, notably the boundary between the two sites. It would be helpful to explore these further

Clearly the operation of the bus station does involve the movement of vehicles 24 hours a day, including Christmas Day. As you are proposing residential use of the site, are measures being put in place to ensure both activities can co-exist, particularly in relation to noise?

The construction of neighbouring buildings has already caused significant disruption to bus operators and passengers. Should this development go ahead will there be reassurances that (1) the bus station can remain fully operational throughout the build phase, (2) bus routes will not need to change or be diverted in any way and (3) pedestrian access be unaffected?

## 6.0 Consultations

### 6.1 Historic England

Comment as follows (summarised):-

The lower parts of the proposal are likely to blend into the landscape reasonably well, helped by the use of brick to clad the towers.

The tallest tower would break the skyline close to the Castle and this would have an impact on the way in which the Castle is perceived from the Copper Horse. The view back to the Castle is one of the most important in Windsor Park, which emphasises the scale and grandeur of both the Castle and the Park. The sense that the Castle sits in a rural landscape which enhances its status and grandeur is still palpable, despite the fact that Slough has become highly urbanised in the last 150 years or so, as most new development blends into the landscape. Anything that breaks the skyline cannot blend in in the same way and we think that the current application is more harmful than the previous, permitted Queensmere scheme as it is that bit closer to the Castle.

There are of course buildings already visible in this view and the wirelines shown emphasise the prominence of the proposals but the application is unlike anything currently built in that one of the proposed pair of towers would break the skyline. This would draw attention to the building and mean that it would not fade into the background as the existing lower buildings do. While it is true that the Queensmere scheme also breaks the skyline in this view but the tallest elements of this appear further away from the Castle so do not have such a marked impact. In our view the proposals would significantly increase the harm of the Queensmere scheme by bringing tall buildings closer to the Castle.

In this case the harm could be avoided if the 27 storey element was a bit shorter and avoided breaking the skyline. We therefore find it difficult to accept the harm as justified unless a compelling reason is given that the development needs to be as high as proposed.

The justifications given in the Planning and Design and Access Statements fall far short of compelling. They simply state that a landmark is needed on this site. The building does not have to be 27 storeys high and break the skyline in order to fulfil this function; it would still be as effective as a landmark if it were a few storeys lower. Even if a compelling reason is given this harm needs to be weighed against the public benefits of the proposal as required by paragraph 134 of the NPPF.

Paragraph 132 of the National Planning Policy Framework states that any harm to a designated heritage asset needs to be clearly and convincingly justified.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

6.2

Heritage Advisor (BEAMS)

Comment as follows (summarised):-

The late 19<sup>th</sup> century grade II listed Slough Station booking hall lies approximately 50 metres to the east and there are 2 further listed structures associated with the station and forming a group. The development will be seen in context with the main station building from the station forecourt area when looking west however there are other tall buildings as a backdrop to the north of the station and elsewhere, the proposed development will change the setting of the station but is not considered to unduly harm its significance.

The grade II Church of Our Lady Immaculate and St. Ethelbert is over 100 metres to the south of the site, on the south side of Wellington Street. Immediately adjacent to the church, and east of it, lies the Grade II listed presbytery. The Roman Catholic Church was built in 1909-10, in the Perpendicular style of flint with stone dressings. The church spire makes it a prominent landmark building when travelling along Wellington Street. Views of the Church are principally achieved from Wellington Street (the main A4 road) on approach from either direction.

Historically churches were usually the tallest buildings within a town / village – giving them visual prominence and using height to highlight their importance. This prominence started to change during the 20<sup>th</sup> century with the construction of taller buildings becoming more commonplace in urban areas; these have the potential to harm the setting and significance of church buildings (and others) and this needs careful consideration – particularly when the cumulative nature of tall developments is taken into account. In this case there are several developments approved locally (such as the Queensmere Shopping Centre redevelopment) which will have some impact upon the setting of the church and thus impact upon its significance. The proposed scheme (and other new development) will be seen in wider views of the church from Wellington Street however due to the separation distance between the site and the church the proposal is not considered to unduly harm its significance.

Historic England have raised significant concerns regarding the impact of the development (in particular the tallest tower) in relation to its position in views of Windsor Castle from the Copper Horse and the way it breaks the skyline close to the Castle. BEAMS shares these concerns. The harm identified to the setting (and significance) of Windsor Castle is 'less than substantial' but is at the higher end of 'less than substantial'.

### 6.3 Hampshire County Council - SUDS

Hampshire County Council has provided comments in relation to the above application as a consultant to Slough Borough Council for surface water drainage.

We have reviewed the following information in relation to the planning submission.

- Campbell Reith Flood Risk Assessment 12584 F1
- Campbell Reith Surface Water Management Plan 12584 F1
- Campbell Reith Email dated 30<sup>th</sup> August 2018

The submitted information addresses our requirements and we have no further comments.

6.4

Thames Water

Comment as follows (summarised):-

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 a 'Grampian Style' condition requiring submission of a drainage strategy.

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. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like an informative about the need for a Groundwater Risk Management Permit.

Request a condition requiring a piling method is submitted.

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 for extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover).

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.

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 for the submission of impact studies of the existing water supply infrastructure

Thames Water recommend that an informative be attached with respect to the Thames Water Main

The proposed development is located within Source Protection Zone 2 of a groundwater abstraction source. These zones are used for potable water sources for public supply for which Thames Water has a statutory duty to protect. Development should not commence until details have been

submitted of how the developer intends to ensure the water abstraction source is not detrimentally affected

Thames Water requests that further information on foundation design be submitted for detailed consideration.

Thames Water ask that the developer produce a detailed foul water drainage strategy.

Thames Water does not envisage concern with the proposed surface water drainage strategy as it is understood to be a significant reduction in surface water discharge to the public sewer.

6.5 Fire and Access Surveyor

Email dated 09/01/2018

Have read the full Concept Fire Strategy by Astute Fire engineers and it appears to answer most of my preliminary points. I would consider this acceptable at this stage.

6.6 Tree Officer

I have viewed the site and proposals and as there are no trees of significance on the site and the proposal has a competent landscape proposal. I have no comment on the application at this time.

6.7 Aircraft Safeguarding, Heathrow Airport Ltd

Email dated 17 October 2017.

Confirm that there no safeguarding objections to the proposed development.

6.8 Crime Prevention Design Advisor, Local Policing Thames Valley Police

No objections subject to conditions:-

- Gym over overcroft to be used only for that use and no other purpose
- External/Physical security inc laminate glass
- Barrier must be security roller shuttered gate/electronic gate not barrer

6.9 Anka Asandei, Contaminated Land Officer

Comments as follows (summarised):-

The site investigation carried out at the site identified visual and olfactory signs on contamination summarised in Section 5.4 Contamination Observations and Testing. This is proposed to be dealt with by the development design, which includes a basement throughout the entire site, scheduled to be dug out, and thus the encountered contamination. This remedial action is acceptable to deal with the encountered contamination hotspots, and any other unidentified contamination likely to be discovered during the re-development.

Other slightly elevated metals and organics concentrations encountered in the water samples were considered to have off-site sources. However, a watching brief is proposed to be kept during the duration of the grounds in order to deal with any other potential sources of contamination.

No significant concentrations of ground gases were encountered, thus no gas protection measures are deemed necessary at this stage.

As part of the remediation actions the excavated contaminated soil/basement soil is proposed to be removed of site. Details of the excavation locations, quantities and receiving landfill, together with any other sample analysis etc., should be recorded and included in a Final Validation Report.

At the time of the report the exact depth of the proposed piled wall was unknown. Once these are known, and if they are likely to go into any of the principal aquifer, it is recommended that a Piling Risk Assessment is carried out, and the Environmental Agency is consulted. This should include the details of both the proposed retaining wall around the basement, and the piles proposed for the rest of the site.

All the records kept during these works will have to be included in the Final Validation Report, together with any other relevant information, maps, drawings, photographs, etc.

Based on the above no objections subject to pre-commencement conditions requiring a remediation validation report and watching brief.

6.10

Natural England

Comment as follows:-

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology service for advice.

Natural England and the Forestry Commission have also published standing advice of ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the Local Planning Authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPA's to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <http://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>.

6.11

Jason Newman (Environmental Quality Team Leader)

Noise and Air Quality comments:

Noise Impact

Comments (summarised) as follows:-

Recommend that any new noise sources or new relevant receptors (i.e. residential receptors) do not experience a rating level higher than 0dB above the background noise level to prevent adverse noise impact.

The noise measurements for rail noise do not show if the rolling stock is any different in terms of noise impact at night (freight trains) as opposed to passenger trains and if the noise level from freight trains is louder, and how many train events there are at night so it is not clear if the worse case scenario been assessed. This is important because it is clear the model demonstrates rail noise increases with the height of the development as residential properties gain direct line of sight of the railway line.

The consultant has undertaken a stage 2 assessment more detailed assessment to determine mitigation. The focus of the mitigation is on appropriate sound insulation of the new blocks to ensure internal noise level guidelines are met. The consultant has discounted acoustic barriers on the basis of visual impact and connectivity with the scheme. In any case barriers are not going to protect the upper floors of the development from road traffic/rail noise.

The Mitigation proposed by the consultant will focus on the weakest acoustic elements of the proposed buildings, i.e. windows. The Sound insulation of the masonry/steel framed façade will offer a high level of sound attenuation  $R_w$  60dB. However, the detailed design of the construction is required to optimise and improve the external building envelope. Particular attention needs to be paid to balconies which may give rise to incident sound reflecting onto the flats below the balcony.

The consultant has undertaken some calculations to determine the minimum acoustic performance of the windows for the most exposed residential facades weighted sound reduction index of around  $R_w$  37dB. These standards will be achieved with “acoustic” double glazing, e.g. units comprising 6mm glass / 16mm cavity / 8.4mm laminated glass. The consultant notes that more detailed calculations will be needed based on the final elevational drawings, in order to determine specific sound insulation performance requirements and any variation in the glazing specification that might be achievable where incident noise levels are lower.

Ventilation requirements for the new development are laid down by building regulations, all habitable rooms are to be provided by background ventilation ‘whole house’; and air extraction from humid areas (bathrooms, kitchens etc..). It should be noted that ventilation can provide a pathway for external incident noise to impact habitable rooms, and therefore it may also require acoustic treatment.

The consultant advises that the development is likely to have mechanical ventilation (MVHR) system to provide both background ventilation ‘whole house’ and extraction ventilation of humid areas. In this case the ventilation system would enable windows to remain closed whilst maintaining the

ventilation requirements of the flat. The calculations for internal noise assumes windows will remain closed. The consultant advises that the windows must be openable to allow for purging of pollutants, paint, smoke etc. on an occasional basis. The reality is residents will leave the windows open even when not purging pollutants, but this cannot be controlled.

The consultant correctly points out that opening the windows will increase the noise intrusion and hence the internal noise levels will increase, potentially above those recommended by Table 8.1. However the resident has control of when to open windows to purge pollutants. Additionally, windows may need to be opened to cool the flat. The issue of heating is therefore important to resolve, to prevent residents using windows as the main means of cooling their flats. An openable window only gives approximately 15 dB(A) of attenuation which means that existing noise levels on the proposed site will breach the internal noise levels as outlined by ProPG, WHO, BS8223 guidelines.

A noise and ventilation condition should be attached to the decision notice that requires the full acoustic details of sound insulation and the full mechanical and operational details relating to the ventilation proposed to be installed within the new blocks and for each elevation, based on the final layout of the flats, additionally the submissions must include all detailed acoustic calculations and assumptions made about how incident noise impacts the new development.

The consultant states within paragraph 8.23 of their report If the noise levels presented in Appendix B are considered in the context of the above guidance, it is clear that noise intrusion into flats with open windows will exceed the ProPG internal noise levels, with noise levels to units on the western and northern elevations potentially of a magnitude that might be unacceptable if such exposure was likely to occur “frequently”.

The consultant advises that the MVHR units will be specified to include a ‘boost’ function to increase the ventilation offered to minimise the need to open windows to provide thermal comfort. However, it is unclear if this will be sufficient to purge the heat out of flats adequately and quickly enough, thought needs to be given to enabling the units to offer some form of cooling function to enable thermal comfort within the flats. The other concern is with MVHR units is that there is a need to regularly maintain and service the units, and repair the units, and a condition will need to be considered with respect to how these units will installed and maintained. Who is responsible for maintaining the mechanical ventilation?

The consultant also points out the units will need to be sited and appropriately attenuated to ensure noise increase from the ventilation is not going to give rise to unacceptable noise. This should be made a condition on consent, but again who is responsible for maintaining the units?

Some thermal modelling has also been undertaken for the proposed block, using CIBSE approach. The model indicates between 8.8% and 18.4% of the year the windows will need to be opened during the ‘design summer year’ in the daytime and 1.2% and 2.7% at night-time. Does the model assume climate change effects for future years? Does it assume worst case climatic temperature rise? Which floor on the blocks is most likely to be impacted by heat, and has this floor been modelled?

If we break this down into 8 hour nights based on the number of hours the window needs to be open at night this varies between flats from 13 nights and 29 nights during the year. The consultant states this is very low percentage of hours the windows would be required to be opened at night. The conclusion is that the modelling is not considered to raise any significant concerns in relation to the ability of residents to maintain acceptable internal noise levels, whilst maintaining thermal comfort. I'm not entirely convinced by this statement, are we really suggesting up to 29 nights is reasonable for internal noise levels to be breached and by what magnitude? Why hasn't the developer considered cooling within the MVHR system to limit the amount of times the windows are required to be open?

The impact in the daytime is greater up to 18.4% of the year, but perhaps more acceptable given the urban nature of the development and the fact that most people sleep at night. In any case I would like to see the maximum internal noise levels for the residential block with windows open during the daytime and night-time before we can accept the consultants statements that noise would not constitute a 'Significant Adverse Effect. In any case we should be striving to mitigate the 'Lowest Observed Adverse Effect Level' and ideally meet internal noise that meets 'no observed adverse effect level'.

The consultant states in 8.30 In addition to the above, it is also considered material to note that the development will deliver "build to rent" accommodation, which is primarily aimed at young professionals. As such, it would appear likely that a significant proportion of the day when windows may need to be open to provide ventilation, the units may not, in fact, be occupied.

The consultant concludes that: Additional thermal control could also be achieved through the use of comfort cooling, however, this is not considered to be a proportionate response to the findings of the initial over-heating assessment and is understood to have significant sustainability and financial implications and is not therefore considered viable for this scheme.

There is still the potential for significant adverse effects from road and rail noise when opening windows at night (up to 29 nights) and to a lesser extent during the day to allow for thermal cooling. In addition the thermal heating of the proposed blocks need to be adequately controlled to minimise the need to open windows as being the main means to control thermal comfort. I would like a clear model showing the internal noise levels during the day and night time, with the windows open and with windows closed, to understand the magnitude of change. I am not yet satisfied that comfort cooling should be dismissed as there are no details relating to its sustainable/financial impacts, just a statement. It is noted additionally design details for the block and use of thermal reflecting materials will also help with reducing thermal heating and it would be useful to understand how this affects the heating model.

The external noise climate means the majority of the scheme is likely to experience noise levels that will give rise to significant community annoyance. The internal courtyard of the development will be adequately

attenuated by the proposed buildings to offer an area that fall below the 55dB LAeq,16hour threshold.

Vibration has also been assessed on the site on the north west corner. This is with a principal view of observing vibration from the rail track from train movements which is concluded based on the vibration measurements to amount to a 'Low probability of adverse comment', the results are accepted.

However, have vibration measurements been taken to determine the effects of HGVs on Stoke Road and buses from the bus station impacts on the proposed residential blocks?

The consultant concludes traffic generation from the proposed site will give negligible noise impacts. This is accepted.

There is no detail relating to the proposed commercial and leisure plant equipment. However, all proposed plant and equipment will need to meet noise limits to prevent future residents experiencing annoyance. The Consultant recommends that the LPA specifies the plant noise limits. Detailed guidance on the assessment of industrial and commercial noise is contained within BS4142. I have recommended a noise condition based on BS4142 for a number of other developments.

The consultant advises that to afford robust protection, noise emissions should ideally be controlled to below a 'lowest observed adverse effect level (LOAEL). In line with BS 4142: 2014 guidance, this means that noise levels would need to be controlled such that the rating level of plant noise does not exceed the typical background noise level during the proposed hours of operation. This would meet our planning condition requirement.

The mixed use nature of the development will need very careful consideration with respect to potential noise generation from commercial and leisure uses and their impact on the new residential flats, consideration of operating hours, noise limits, restriction on activities, more robust internal sound insulation and isolation of the residential blocks from commercial uses will assist. Further noise assessment and mitigation are potentially required to ensure mixed uses will be compatible and will not give rise to a nuisance.

It should be noted that the NET team are likely to require construction noise activities to take place between 8am and 6pm week days and 8am to 1pm on Saturdays.

The consultant consider there are no noise sensitive premises within 20m of the site and therefore concludes that it is unlikely that vibration associated with construction will have any significant adverse impact. In my view the developer should be required to develop a construction and environmental management plan (CEMP) for the development that will need to be submitted to the LPA for approval prior to works commencing on the site.

#### Air Quality Background

Comments (summarised) as follows:-

Slough Borough Council (SBC) has designated 5 Air Quality Management Areas (AQMA) due to elevated concentrations of Nitrogen Dioxide (NO<sub>2</sub>, annual average), including:

- Slough Town Centre
- M4
- Tuns lane
- Brands Hill
- Bath Road

While particulate matter concentrations do not breach EU Limit Values, levels in Slough are higher than both the national and regional averages and it is estimated that 1 in 19 deaths are attributable to PM<sub>2.5</sub> in Slough (PHE).

SBC adopted the Slough Low Emission Strategy (LES) 2018-25 at Full Council as policy on the 27<sup>th</sup> September 2018. The LES forms part of the Slough Air Quality Action Plan (AQAP). This application has been assessed in relation to air quality considerations in line with the Slough Low Emission Strategy Technical Report: 'Land-Use planning and Development Management' Guidance.

The Octagon scheme is considered to have a MAJOR air quality impact classification. An air quality assessment was submitted in September 2017 and again in August 2018, after NO<sub>2</sub> diffusion tube monitoring was carried out at the site between the end of March and beginning of July 2018. Comments are provided below.

Analysis of the raw diffusion tube data shows that the averaged monitoring results were skewed downwards by significantly lower, monitored levels for the final month of monitoring (6/6/18 to 4/7/18). Again, it isn't clear whether this data is representative or exceptional. The period coincided with very warm weather and the World Cup. While it is helpful that the monitoring exercise was undertaken, we are also mindful of the inherent error in extrapolating data from such exercises and a precautionary approach should prevail.

The predicted concentrations for 2020 in the 2018 assessment look over-optimistic. Given the level of parking, the impact of the scheme looks to be under estimated. There is no assessment of the increase in emissions due to the scheme in either assessment.

When interpreting scheme impacts it is important that SBC also uses local knowledge to identify significant issues. It is probable that the Town Centre AQMA will require extending to incorporate the scheme.

Taking both assessments at face value and in good faith, in addition to our local knowledge, the following conclusions are drawn:

- Data appears to show that concentrations of NO<sub>2</sub> in the vicinity of the development site are on the cusp of the AQO and that there is a likelihood that, once the scheme is in place, the Town Centre AQMA will need to be extended to include the site due to the introduction of relevant receptor.
- However, through the implementation of the Slough Low Emission Strategy measures and the allocation of residential accommodation from

the 1<sup>st</sup> floor upwards of the scheme, it should be possible to manage the issue of exposure, with appropriate mitigation to ensure that future NO<sub>2</sub> concentrations meet the AQO at the earliest opportunity

- The scheme will have an impact on NO<sub>2</sub> concentrations in the area, however, with appropriate mitigation these impacts can be minimized
- It is considered that, with suitably designed scheme mitigation, including off-set mitigation in line with the Slough Low Emission Strategy, the development proposal can be made acceptable in terms of both managing exposure and the impact of the scheme on air quality concentrations

***Proposed mitigation:***

- The proposals include the provision of Travel Plans for both the residential and hotel aspects of the scheme, including provision for cycling & walking and a car club. These proposals are welcomed, however, given SBC plans to develop electric car clubs in the Town Centre, further consideration is needed as to how the scheme proposals and SBC plans for car clubs can be combined into an integrated provision throughout the Town Centre, including the provision of rapid electric charging units and electric vehicle bays and laybys close to the scheme.
- The proposals include 20% active and 20% passive provision of electric charging units. While the application proposes reduced car parking provision, it is not clear how residential parking spaces will be allocated. Where a parking space is to be allocated to a dwelling we would expect a 100% provision of operational charging points from scheme opening. Additionally, with the Government's planned requirement that new cars be zero emission capable from 2040, the proposals should include a strategy for increasing electric vehicle charging provision after scheme opening. This information should be provided within the Travel Plan. Consideration should be given to criteria for increasing on-site provision or providing off-set mitigation, in conjunction with SBC, to increase public charging facilities in the vicinity. The type of electric charging points provided should be in line with the Slough LES and agreed with SBC
- The Travel Plan should include details of how the take-up of plug-in vehicles can be promoted and monitored, including criteria for increased provision

***Additional mitigation requirements***

In order to make the scheme acceptable, further discussions and negotiations between SBC and the developer are required to ensure that suitable additional mitigation, whether on-site or through off-set, is identified and incorporated into the scheme.

The strategic position of the scheme provides an opportunity to help deliver key LES measures and create an ultra-low emission hub in the Town Centre AQMA.

Without prejudicing the resolution of these issues, further mitigation is outlined below that is suitable for the scheme in line with the Slough LES

### *Construction Phase*

The applicant shall submit details of either a Construction Environmental Management Plan (CEMP) or similar robust code of construction practice to be followed during the construction phase, including:

- All construction related vehicles shall be a minimum Euro 6/VI Standard
- All relevant non-road mobile machinery (NRMM) shall comply with the emission standards in table 10 in the LES guidance

### *Operational Phase*

In line with the Slough LES, SBC will seek a Section 106 contribution (or other obligation) of £250,000 to secure off-set mitigation that is proportional to the emission increases arising from the scheme. We proposed to combine these contributions/obligations with highway S106 contributions. The package is considering the following:

- S106/S278 Provision and building and extending of 6 new low emission laybys around Brunel Way (map to be produced)
- S106/S278 Provision of signage, bay markings and associated TROs
- S106/S278 Provision and installation and DNO connection for Rapid EVs servicing the low emission laybys around Brunel Way
- S106 EV infrastructure to service:
  - 2 EV car clubs bays -
  - 2 dedicated EV Taxi Bays and Rapid Chargers
  - 2 Public EV bay – replacement of existing Rapid Charger
- S106 EV infrastructure management and operation to be transferred to the Councils appointed operators
- S106 Financial contribution towards future EV bus infrastructure within the bus station of £150,000
- S106 Financial contribution towards Highway Improvements in Brunel Way of £x (tbc)

The measures will contribute towards the following Low Emission Programmes:

#### Low Emission Programme for Scheme and S106 contribution

#### Taxi EV infrastructure

Project 17: Provision of dedicated EV Rapid charging infrastructure for EV Taxi/Licensed Private Hire Vehicle on Station Square/Brunel Way. The Total cost profile for this project to cover procurement, DNO Connection, civil works, installation and commissioning, data and revenue management systems is £100,000

#### Public Rapid Charger Infrastructure

Project 18: Development rapid Charging Infrastructure in Station Square/Brunel Way (A total of 1 rapid charger will be installed) to promote ultra-low emission vehicle take-up to improve air quality. The Total cost profile for this project to cover procurement, civil works, DNO connection, installation and commissioning, data and revenue management systems is £50,000

#### Town Centre EV Car Club

Project 20: Station Square/Brunel Way EV Car Club to set up 2 bays and one electric charging point in Brunel Way Area (5 year contract period part

of overall procurement of Town Centre Electric Car Club). The total cost profile for 5 year contract plus installation of dedicated EV charging point, TRO, Signage and civil works is £100,000

Electric Bus Programme (A4 SMaRT)

Project 65: Development of Electric Bus service for A4 SMaRT service to Heathrow, including provision of dedicated Bus rapid EV charging systems at the Town Centre Bus Station and Park and Ride in Brands Hill, civils and DNO connections and subsidising the provision of the electric buses for SBC nominated operator. The Total cost profile for this project to cover procurement, DNO Connection, civil works, installation and commissioning, data management systems is £1,000,000.

6. 12 Shamina Jetha, Housing Development Team Leader (Affordable Housing)

This Build to Rent scheme can, as an exception to normal practice, satisfy the Local Plan requirement for the provision of affordable housing (at a rate of 40% of the total number of dwellings proposed) by means of the payment of a financial contribution to the Council, to spend on affordable housing provision.

The exceptional circumstances relating to this proposal are that the Private Rented Sector model of housing provision proposed to be built, in particular the long term management arrangement for letting and servicing, would not lend itself easily or securely to the nomination and rental regimes of the Council or other Registered provider, such that the dwellings could be reliably classed as “affordable” in perpetuity. Also the proposed space provision and layout arrangements for the majority of the flats would not match the nationally described space standards, so the scheme would need substantial re-design, likely resulting in a reduction in the number of units in the development overall, if on-site AH provision was to be made within the same building envelopes.

The exceptional circumstances would pertain so long as the development is a Private Rented Sector housing project. If the flats were, on completion, or at a later date, to be sold individually on what ever length of lease, then a principal reason for treating the case as an exception to normal AH practice would disappear. The residential development will need to demonstrate that it will be retained as a single entity, operated and managed as such, in perpetuity. This should be secured by obligation in a Sec 106.

Normally, payment of a financial contribution in lieu of on-site provision of homes, is limited to schemes of between 15 and 24 homes. In the exceptional circumstances for this case, a bespoke calculation of commuted sum is set out below.

**Affordable Housing contribution payable at 30% contribution for rent**

Unit Type	Full scheme	Number (at 30%)	Funding Shortfall	Total Funding Shortfall
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studio	32	9.6	£60,000	£576,000
1BF	165	49.5	£60,000	£2,970,000
2BF	146	43.8	£70,000	£3,066,000
Total	343	102.9		

Sub total commuted sum payable **£6,612,000**

**Affordable Housing contribution payable at 10% contribution for intermediate (calculated as 50% of Rent contribution)**

Unit Type	Full scheme	Number (at 10%)	Funding Shortfall	Total Funding Shortfall
studio	32	3.2	£30,000	£96,000
1BF	165	16.5	£30,000	£495,000
2BF	146	14.6	£35,000	£511,000
Total	343	34.3		

Sub total commuted sum payable **£1,006,000**

**Total commuted sum payable £7,618,000**

Full payment of the calculated financial contribution should be paid on commencement of the development (or earlier), with indexation of the sum between the planning permission decision being issued and the date of payment.

Agreement to full payment on commencement will meet the developer's obligation on AH, and no overage (sum or AH provision) will be sought at a later date by the Council, provided the flats remain as PRS under a single management and operating body. In the event of any of the units being sold out of the PRS arrangement, in face of the obligation to retain, a mechanism will be triggered to review whether overage (in the case where a valuation of the development costs and sale receipt of the unit results in an uplift in profit for the developer over and above that of a fixed level, to be agreed) is payable to SBC.

No open book scrutiny of the viability of the development prior to the determination of the planning application shall be sought if the developer agrees to full payment, as above. The developer will by obligation within the Sec 106 relinquish the right to seek a review of the financial contribution on viability grounds at any time after the planning permission is issued.

Within 10 years of the receipt of the money, SBC will use or commit sums from the financial contribution to provide AH on the Borough. The developer may request at any time after the payment information about how the contribution has been/is being/will be used. If the sum is not used or committed within the prescribed time, the unspent part will be returned to the developer.

6.13

Transport and Highways

Comments (summarised) as follows:-

The proposed access is off the private bus station access road which is owned by Slough Borough Council. The applicant has been having conversations with the SBC assets team and are to agree a financial sum to secure access rights to the development. The proposed access is acceptable in principle, but to make the proposal acceptable the access road would need to be widened by 1m along its length.

It is unclear if the applicant is looking into altering the William Street access point to enable a right turn facility to allow a Northbound movement exiting the site. The applicant should consider modifying the junction on William Street to allow both Northbound and Southbound traffic movements.

The applicant must show visibility splays of 2.4x33m on either side of the vehicular access point as well as 2.4x2.4 pedestrian visibility spays. These appear to be achievable

In order to prevent taxi's and other vehicles dropping off on the bus station access road, it will be necessary for the applicant to provide a drop-off facility of some sort.

The car park capacity has been reduced from the initial design and there is unlikely to be a large number of traffic movements at any one time. The modelling analysis will provide further information on the junction capacity and likely queues.

The entrance must be clearly signed and marked, also the drop-off layby requested by Highways will limit vehicles from mistakenly driving into the Bus Station. Further signage at the Bus Station may be required which can be picked up on the s278 detailed design.

The proposed servicing layout is acceptable as it proposes 4no service vehicle bays and a turning area. It is unlikely for more than 4no service vehicles to be on site at any one time, furthermore 2 additional HGV's can stack and wait within the site. This gives the site a total capacity of 6no HGV's which I confirm is adequate. It is quite normal for delivery slots to be allocated for larger deliveries. No vehicles should need to reverse out of the site or carry out excessive maneuvering on the access road and therefore the impact on the operation of the buses should be minimal. There should be no need for any unauthorised vehicles to enter the Bus Station however this could possibly be prevented by use of ANPR CCTV enforcement of the Bus Station access which if required would need to be funded by the developer.

The height of the undercroft is designed to ensure the largest vehicles expected to access the site can do so easily therefore there should be no issues with vehicles being unable to enter the undercroft. The car park can accommodate all standard height cars, SUV's and small vans therefore we do not foresee this as being an issue.

A construction management plan will be needed to ensure that the bus station can remain fully operational throughout the build phase, bus routes will not need to change or be diverted in any way and pedestrian access will be unaffected

The proposed application provides a total of 107 car parking spaces which equates to 73 spaces for the hotel and 34 for the residential element. The LinSig modelling carried out by the applicant is currently being assessed by our consultants and we will provide further comment on any implications or mitigation required once we have this information.

It is already evident that there is considerable queuing on William Street in the reservoir between the bus station access road and Brunel Way (with invariably two lanes full), and vehicles from Brunel Way only just getting out on the green phase, or having to push through, that any worsening of this could result in unacceptable delay on Brunel Way and Stoke Road further north. The impact of this needs to be modelled. The applicant has carried out LinSig modelling which is currently being assessed. This assessment should provide further information on the situation and any implications.

Current bus and train services information should be provided including information on how many people are likely to commute by Public Transport. This is critical information to analyse whether there is enough Public Transport services available to accommodate the proposed increase in demand.

The developer in their consultation will need to demonstrate that there is enough capacity available to cope the proposed demand.

Insufficient detail provided in both the Residential Travel Plan and the Hotel Travel Plan. The measures in particular need a lot more thought specifically to the site. More detailed travel plans should be secured prior to occupation and secured by Section 106 Agreement.

The Car & Cycle parking provision complies with the local plan parking standards. Out of the 107no car parking spaces, a minimum of 10% must be EV bays therefore 11no parking spaces for EV vehicles with EV charging capabilities are required. The visitor cycle parking must be in a stainless steel finish, matching with Heart of Slough materials. The applicant will be required to submit a car park management plan. This can be secured via condition (pre-occupation)

As the road is being intensified and will no longer be exclusively used by the bus service, Street lighting must be provided to illuminate to access road to BS 5489. The road markings on the access road will require revising to take into account the new accesses and widened road.

There is ample provision for servicing within the site for 4no service vehicles with stacking for an additional 2no. The servicing of the site should be supported with a serving strategy.

Suitably located refuse stores have been designed into this revised scheme, bins will be brought out to a collection point by the management company and collected from the service yard.

The basement car park must be designed in accordance with The Institution of Structural Engineers publication "Design Recommendations for Multi-storey and Underground Car Parks 2011 - 4th Edition" to ensure it will operate safely and provide unimpeded ingress and egress for the specified number of parking bays. In order to demonstrate this it is necessary to submit a detailed dimensioned car park layout for approval. This requirement should not be made as a planning condition for approval as the parking provision is a critical factor for the approval of this scheme and a lower limit of car parking would not be deemed as acceptable.

The absolute minimum headroom required within the service yard area is 4.1m to cater for refuse and other large service vehicles although ideally it should be 4.5m. Motor cycles are prone to theft as they can be readily lifted into another vehicle. Security should therefore be a key consideration when providing motor cycle parking facilities

Designated motor cycle parking provision should be built into the car park where possible to prevent motor cycles from parking in car parking spaces which will already be in high demand. Physical security for motor cycle parking in the form of rails, hoops or posts designed to provide simple locking points should be provided within the designated bays where possible. If a locking rail is provided it should be set 600mm above the ground to accommodate the range of wheel sizes in use.

The layout provides adequate pedestrian links with several desire lines being catered for and routes being well overlooked and suitable for use.

The site sits within the heart of Slough and therefore the footways surrounding the site which are currently paved in ASP flags must be lifted and replaced with natural stone granite paving to match the Heart of Slough paving including the pattern and the street furniture palette. These works should be carried out under a s278 agreement and secured under any s106 agreement.

Any planters, trees, street furniture, etc within the public highway will need to be taken from the Heart of Slough materials palette.

A pedestrian crossing has been proposed on William Street by the applicant. This crossing would be in addition to the existing crossings. We do not believe there is a strong enough desire line and justification for an additional crossing. An additional crossing would reduce the vehicle stacking capacity at the William Street junction where two other pedestrian crossings already exist in close proximity and is deemed to be unnecessary and add to obstructive street clutter.

This application site is in a very traffic sensitive area with risk of disruption to the highway network and all users of the highway, as such it must be supported with a detailed construction management plan to minimise any danger or inconvenience to the public during construction. This can be secured via condition.

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 and transport schedule.

Subject to amendments, additional information, highway works and contributions, there are no objections to this application from a Transport & Highways perspective.

#### 6.14 Special Projects Planner

There are several concerns about the content of the Energy Strategy. The Council does wish to see photovoltaic panels on the roof areas (hotel and residential) that are not used for residential amenity. It is appreciated this would reduce green roof area. Hopefully some of the plant area can include PV's. The reason for this request is that PVs contribute significantly to carbon emission reduction compared to Building Regs and the Council's current policy seeks 15% better than BR for residential development – Developers Guide Part 2 updated Sep 2017. Adding PV's can improve upon the currently proposed 10% better than Building Regs.

The Council's policy, now and before Sept. 2017, requires the hotel to achieve Breeam Very Good. Your Planning Statement says this requirement was dropped at the pre app stage. If it has not been stated in writing by the Council a condition requiring it will be added to any planning permission.

Below are various points that the Council's Senior Carbon Project Officer has raised. The Council would like these clarified or addressed if possible. If the proposal for the development as a whole is reviewed or significantly changed hopefully all the points in the comments below can be addressed.

Conditions will be applied to any permission to ensure the Energy Strategy is achieved in terms of better than Building Regs. % and Breeam.

Pg 1: The strategy states: "*The above figures denote the maximum carbon saving from the building form whilst keeping the project economically viable.*". This is not defined in any further detail so we have limited information as to what energy reduction or generation measures have been excluded for this reason.

Pg 1, 19 & 22: It is stated: "*There could have been a further reduction achieved through the use of roof mounted photovoltaic panels however these were not considered following advice from the council in favour of using these roof spaces as amenity areas.*". This does not account for other areas that may be suitable for Solar PV on the building, which should be discussed. The solar potential of the building is mentioned on page 31 where it states that: "*If PV panels were considered further a 10% saving from renewables in line with the relevant policies may have been achieved.*".

Pg 6: It states: "*Within the energy demand assessment the following fuel carbon dioxide emission intensity factors have been used in line with Building Regulations.*" This is not adequately referenced so the figures can be cross-checked.

Pg 6, 8, 11 & 12: There is no explanation for the apartment types in the carbon baseline tables so the tables do not help explain the baseline figures. Calculations behind the number of types of apartments for the average baseline carbon emissions statistic of 24.77 kg CO<sub>2</sub>/m<sup>2</sup>/year are

not shown. The same issues apply to the SAP calculations for the passive/low energy tables and the final weighted figure of 23.98 kg CO<sub>2</sub>/m<sup>2</sup>/year.

Pg 10: The Energy Efficiency Measures listed in the current design of the development are described at a high level and greater detail would be beneficial. For example; “*Improved building fabric thermal insulation*” does not detail which specific types will be employed such as cavity wall insulation and “*High efficiency central plant*” does not explain what features would make it efficient.

Pg 21: Regarding wind power it is stated: “*There is growing evidence of urban wind turbines failing to perform in line with manufacturer’s estimated outputs and as a result wind turbines are likely to produce only modest power outputs with corresponding low carbon dioxide emission reduction within urban sites.*”. This is not backed up with any source. Before ruling out a generation technology appropriate evidence should be provided.

Pg 23: Regarding biomass as an energy generation technology the potential impact on local air quality is discussed. It should be mentioned that for more information on air quality Slough Borough Council’s Draft Low Emission Strategy is available.

Pg 24: The strategy discusses the potential use of ground source heat pumps however states they are not economically viable and air source heat pumps will be used as an alternative. No evidence is given to the economic aspect but further information should be provided as to why both ground source and air source heat pumps cannot be used in conjunction with each other especially as ground source heat pumps are often more efficient. Pg 24: The report does not explain in detail why the air source heat pumps are not to be used with the residential units.

Notwithstanding the comments above, the two matters that need to be addressed are finding roof space for PV’s if possible and achieving Breeam for the hotel; the two matters could be covered by condition.

6.15

#### Council’s Daylight and Sunlight consultant

The daylight and sunlight assessment of the architectural design is generally competent, referencing industry standard sources for the assessment methodology. It should be noted that the referenced BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice, although it provided various assessment methodologies, specifically states that it should not be used to defined minimum required standards. Consequently, it is assumed there will be dwellings with lesser standards of daylight and sunlight amenity than the BRE suggested criteria.

The architectural layouts and fenestration have changed since the September 2017 planning application report. As a result, there is an update under cover of the 26th July 2018 letter. It should be noted that the issue of apartment excess sunlight appears to have had insufficient consideration. Based on the July 2018 revised assessment, the following headlines should be noted:

1. There is no consideration of daylight loss to adjacent sites due to an assessment of no existing dwellings being close by.

2. Within the development, daylight access and sun access is regarded as satisfactory for most dwellings.
3. The central outdoor amenity space is not well sunlight, falling substantially below the BRE guidance of half the public area receiving at least 2hrs of sunlight on 21st March (ie mid-year).
4. To present a more positive story, the assessment also presents the public space sun exposure for 21<sup>st</sup> June. This is misleading because this only occurs for one day of the year (clouds permitting).
5. Tall buildings are anticipated for the adjacent TVU site. This reduction on daylight and sunlight to the Station Square development has not been considered.
6. Optimistic assumptions have been assumed for room surface reflectances; all surfaces are as new light coloured, unobstructed by furnishings and without a maintenance factor for cleanliness as apply elsewhere for the glass.
7. The quoted high daylight factors in many rooms (up to 4 times the recommended levels) should be regarded as a warning sign of potentially major solar overheating issues. This should be investigated before the fenestration sizing is approved.

The DAS anticipates future residential blocks on the adjacent TVU site and the Visual Impact Assessment provides an indication of its likely height. This daylight and sunlight assessment does not appear to have considered this future TVU site redevelopment. In the absence of specific site development detail, the daylighting assessment convention is to reflect the Station Square development massing onto the adjacent site and then re-assess the impact of this future massing on daylight and sunlight availability for Station Square.

The DAS states that the development 'massing was sculpted to maximise exposure to natural light...'. It goes on to say that 'The hotel is then located to the south, this being the lowest massing in the composition. This allows for sunlight to reach the public realm at the heart of the scheme and creates an identity of its own on the south west corner.' Under the heading of Landscaping & Public Realm, the DAS states that 'Good levels of daylight and sunlight' are achieved. This daylight assessment does not support these claims. Indeed, various of the DAS CGI images are grossly misleading in their implied sunlight penetration into a north facing courtyard using non-geometrically accurate solar angles. The BRE guide recommends half the area of a public space should receive at least two hours of direct sunlight on 21st March (ie mid-year) for it to be generally regarded as a well-lit space. This development receives less than half this amount. It then becomes a debateable point whether this public space provides the level of amenity to be the 'year-round useable space' aspired to

The DAS states that 'the windows are proportioned to provide maximum daylight levels in the units, whilst avoiding the negative impact of overheating'. Apartment daylight availability depends largely on the amount of sky visible from its windows, with the visible sky area increasing significantly for floors as they move up a tall building. In design terms to achieve optimum daylight levels, this should be mirrored by more modest window sizes being needed on floors as they move further up the tall building. The façade elevations do not show this, implying that solar overheating has not been properly considered.

Typically, some 80% of apartment summer peak heat gain is due to direct solar gain. This assessment average daylight factors for this development suggest that glazing levels for the more exposed rooms are more than 4 times the size of the recommended daylight criteria. This in turn implies 4 times the peak solar gain if those windows face east, south or west. Given these excessive solar exposed window areas, apartment overheating is almost certain.

The overheating issue is even more acute for single-sided apartments lacking cross natural ventilation. Typically, single-sided apartments can achieve only half the natural ventilation air flow and hence half the natural cooling ability of cross-ventilated apartments. With solar gain being such a dominance contribution towards overheating, this implies windows for single-sided apartments should be in the region of half the solar exposed area of those with cross-ventilation. The faced elevations do not show this, once again implying solar overheating assessment has not fed into the architectural design. It is recommended that apartment summer overheating detailed assessment is carried on before the fenestration arrangement is finalised in any planning approval.

6.16

Councils Wind Microclimate consultant

The wind assessment of the architectural design is generally competent, carried out by experienced consultants in this field. The architecture and massing have not generally considered microclimate wind as a basic design criteria. As a result, three sets of wind mitigation amendments have been proposed and the results are at best marginal. The following headlines should be noted:

1. The proposed wind mitigation is not reflected in the current architecture and landscaping drawings.
2. Wind speeds can be expected to change significantly if tall buildings occupy the adjacent TVU site. There is no indication the so called 'Cumulative' study includes this adjacent tall-building massing.
3. For a 'year-round useable' plaza, no wind suitability information is offered for spring and autumn.
4. It is stated that wind turbulence levels become worse because of the building, but no data is given.
5. The impact on cyclists of higher wind speeds and turbulence on roads has not been considered.
6. How suitable will the north facing café seating area be, given emerging thinking that the 'thirty-yearold' Lawson criteria does not match today's 'café culture' comfort expectations - with wind chill of as much as 4°C.

With the expected high wind conditions, particularly at building corners, confirmation should be sought that wind advice is being provided to the architect for the selection of wind-resistant window furniture, given manually operated naturally ventilation windows form a key part of the overall building design.

The DAS states that 'with the proposed development completed, wind speeds around the site increase'. High quality design should avoid this. Currently, the site is wind swept and provides little microclimate protection, yet buildings in urban areas can and do have the ability to redirect wind and as a result low-level urban wind speeds are normally lower than the countryside. The proposed design of tall vertical facades down to

pedestrian level provides no massing mitigation against downdraughts and channelling/accelerating.

A series of wind tunnel tests identified the following limited mitigations. No updated architectural and landscape drawings show how all of these are to be implemented.

1. Report Rev.C, Sep 2017:

- a. A cluster of evergreen/dense branched deciduous trees (minimum of 5m) south-east of the Hotel Block
- b. Small evergreen/dense branched deciduous trees, shrubs in planters and porous staggered screens (a minimum of 2m in height) between Block A and the Hotel Block;
- c. Small trees/shrubs in planters around the entrance to the restaurant of the Hotel Block (receptor 69)/recessing this entrance by 1.5m; and
- d. Localised landscaping such as small trees, shrubs in planters or porous/solid screens (between 1-1.5m in height) around proposed seating areas on the podium and roof terrace levels.

2. Addendum No.1, 17th October 2017:

- a. 1no. 6.5m deciduous tree at South-West corner of Hotel Block, 2no. (6.5m and 4.5m) deciduous trees at South- East corner of Hotel Block and 3no. 4m deciduous trees along South of Hotel Block;
- b. 3no. evergreen 5m trees with 1m shrubs below at South-East corner of Hotel Block;
- c. 2no. deciduous 4.5m trees between West Block and Hotel Block;
- d. 0.5m planter with 4m deciduous tree near probe 85 in courtyard; and
- e. 5no. 0.5m planters with 2.5m deciduous trees in the roof terrace of the Eastern Block.

3. Addendum No.2, 18th May 2018:

- f. Solid 1m high screening around the seating area to the north-east of the site (receptor 96);
- g. Solid screen on roof terrace (approximately 2m high).
- h. Porous screen along the eastern side of the updated design of the Proposed Development should be changed to solid to reduce strong wind exceedances at receptor 78.

The DAS anticipates future residential blocks on the adjacent TVU site and the Visual Impact Assessment provides an indication of its likely height. The wind assessment Configuration 3 is said to include cumulative surrounding TVU site buildings, however does not suggest it includes these future tall adjacent buildings that are likely to significantly impact the local wind speeds.

The Lawson wind assessment criteria are now some thirty years old and were developed before the UK café culture existing. In the meantime, expectations of outdoor amenity and comfortable wind microclimates have increased. The proposed 'sitting' criteria assumes 0-4m/s wide speeds. This implies the microclimate will feel up to 4 °C of wind-chill colder than the external ambient air temperatures for which people are suitably dressed (ref: Fanger for 10-20 °C temperature & business suit type clothing). Added to this the café location is on north facing corner and will have limited exposed sun hours. The viability of this outdoor use in this location should be questioned. Based on adverse wind conditions around the base of Lawson Criteria compliant completed buildings authorities, such as the City

of London, are now developing lower wind speed criteria as part of emerging policy to encourage improved wind microclimate design.

Cyclists are particularly susceptible to localised wind gusting. This tends to occur around buildings. The wind assessment has identified increased wind speeds (and probable increased turbulence) in road areas. Being pedestrian focused, the assessment has suggested these to be of lesser concern. The assessors should be asked what the impact of these higher wind speeds on cyclists are likely to be, given it is SBC policy to encourage increased cycling.

- 6.17 Mr. T. Madden, Asset Management (Education Planning)  
All contributions other than primary education are required. The contributions would go towards Marish Primary School which is creating bulge classes to ensure we meet our Basic Need requirements in 2 or 3 years groups i.e. we are almost full in every single school. While an argument could be made this project is nowhere near the development, as its purpose is to meet Basic Need, it actually serves all areas
- 6.18 Network Rail  
No response received
- 6.19 The Council for British Archaeology  
No response received
- 6.20 English Heritage, South East Region  
No response received
- 6.21 Environment Agency (Development Control)  
No response received
- 6.22 Sustainable Places, Environment Agency South East  
No response received
- 6.23 Environmental Protection  
No response received
- 6.24 Planning and Environment Group, National Grid Gas plc  
No response received
- 6.25 Southern Electric  
No response received
- 6.26 Thames Valley West District Transco  
No response received
- 6.27 Planning, Royal Borough of Windsor and Maidenhead  
No response received

## **PART B: PLANNING APPRAISAL**

- 7.0 Policy Background
- 7.1 National Planning Policy Framework 2018 and National Planning Policy Guidance:  
Chapter 2: Achieving Sustainable Development  
Chapter 4: Decision making  
Chapter 5: Delivering a sufficient supply of homes  
Chapter 7: Ensuring the vitality of town centres  
Chapter 8: Promoting healthy and safe communities  
Chapter 9: Promoting sustainable transport  
Chapter 11: Making effective use of land  
Chapter 12: Achieving well-designed places  
Chapter 14: Meeting the challenge of climate change, flooding and coastal change  
Chapter 15: Conserving and enhancing the natural environment  
Chapter 16: Conserving and enhancing the historic environment
- 7.2 The Slough Local Development Framework, Core Strategy 2006 – 2026, Development Plan Document, December 2008  
Core Policy 1 - Spatial Vision and Strategic Objectives for Slough  
Core Policy 3 – Housing Distribution  
Core Policy 4 – Type of Housing  
Core Policy 5 – Employment  
Core Policy 6 – Retail, Leisure and Community Facilities  
Core Policy 7 – Transport  
Core Policy 8 – Sustainability and the Environment  
Core Policy 9 – Natural and Built Environment  
Core Policy 10 - Infrastructure  
Core Policy 12 – Community safety
- 7.3 The Adopted Local Plan for Slough 2004 (Saved Policies)  
Policy H9 – Comprehensive Planning  
Policy H14 – Amenity Space  
Policy S1 – Retail Hierarchy  
Policy S11 – Late Leisure Uses in Slough Town Centre  
Policy S18 – Security Shutters  
Policy EN1 – Standard of Design  
Policy EN3 – Landscaping  
Policy EN5 – Design and Crime Prevention  
Policy EN29 – Air Pollution  
Policy OSC5 – Public Open Space Requirements  
Policy OSC15 – Provision of Facilities in New Residential Developments  
Policy T2 - Parking Restraint  
Policy T8 – Cycling Network and Facilities  
Policy T9 – Bus Network and Facilities
- 7.4 Other Relevant Documents/Guidance
- Local Development Framework Site Allocations Development Plan Document
  - Slough Borough Council Developer’s Guide Parts 1-4
  - Proposals Map

7.5 Slough Local Development Plan and the NPPF - PAS Self Assessment Checklist

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).

7.6 The revised version of the National Planning Policy Framework (NPPF) was published upon 24th July 2018.

Planning Officers have considered the proposed development against the revised NPPF which has been used together with other material planning considerations to assess this planning application.

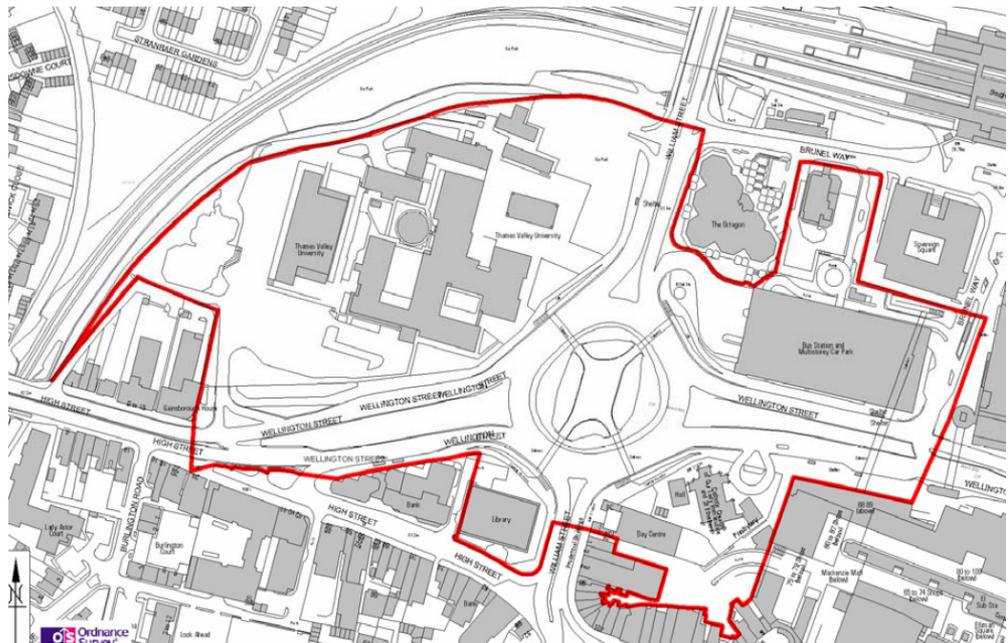
The NPPF states that decision-makers at every level should seek to approve applications for sustainable development where possible and planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

7.7 The planning considerations for this proposal are:  
Principle of development  
Impact on Heritage Assets  
Impact on the character and appearance of the area  
Housing mix and Affordable housing  
Living conditions for future occupiers of the development  
Daylight and sunlight  
Potential wind tunnel effect due to height of buildings  
Impact on amenity of neighbouring occupiers  
Highways/Transport and parking  
Air Quality  
Sustainable Design and construction  
Surface water drainage  
Safe and Accessible Environment  
Fire Strategy  
Infrastructure/S106 requirements

8.0 Principle of development

8.1 The whole of the site was previously occupied by the Octagon building and is currently used as a temporary car park. The site is within the Town Centre Boundary, but is not allocated within the Council's Site Allocations DPD. The site adjoins, but does not form part of, Slough Borough Council's Heart of Slough Regeneration proposals.

- 8.2 For information the plan below shows the Heart of Slough, which proposes comprehensive regeneration for residential, offices, hotel, bus station, library, retail, restaurants and cafes, drinking establishments, education, leisure, associated changes to the road network, improvements to the public realm and parking. While the site is not part of the Heart of Slough, the Octagon site is surrounded on three sides by the area identified as the Heart of Slough.



- 8.3 The site is not located within one of the defined 'Existing Business Areas' and as such given the very sustainable town centre location and its proximity to the Heart of Slough, a mixed use of a hotel and residential development would be highly compatible with the surrounding area. Therefore, there would be no objection in principle to the redevelopment of the site for a mixed used scheme.

- 8.4 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.

- 8.5 The proposal also meets the Governments objective of significantly boosting the supply of homes as set out in the NPPF 2018.

9.0 **Impact on the character and appearance of the area**

- 9.1 The National Planning Policy Framework 2018 encourages new buildings to be of a high quality design that should be compatible with their site and surroundings. This is reflected in Core Policy 8 of the Core Strategy, and Local Plan Policies EN1 and EN2.

- 9.2 The site is surrounded by hoardings and has been used as a temporary surface level car park on the vacant land for some time. Notwithstanding

- the current use, the site is of poor appearance and creates a fairly unsatisfactory perception of Slough Town Centre at the point of arrival to the town, either by car or public transport. The site is in a highly accessible location, adjacent to rail and bus stations and the High Street and is also highly visible and accessible from several public vantage points.
- 9.3 The application proposes the redevelopment of the site to provide three buildings in total, two of which would result in a considerable increase in height over the building previously on the site and would represent substantial development in the area. Although there would be a significant increase in height and mass, the application site is located on a contained plot surrounded by the railway line, a main road and the access to the bus station.
- 9.4 There have been significant changes to the area comprising the Heart of Slough with the completion of the bus station and The Curve within the last five years; further developments are anticipated with the part construction of 2 Brunel Place (known as the UNI or 'tick' building), the Old Library site development (recently resolved for approval at planning committee), and the Thames Valley University Site which will have towers of varying height. Approval has already been granted for the redevelopment of Queensmere, consisting of towers that will be up to 73 metres in height (15 to 23 storeys). It is therefore considered that from the nature of both approved buildings and anticipated development in the surrounding area, a large scale development of this nature is acceptable in principle.
- 9.5 The proposal would deliver a high quality mixed use scheme that would be complementary to development in the Heart of Slough Masterplan, with a new pedestrian route that will improve connectivity and a public open space for people to meet. The provision of a high quality Build to Rent scheme and a new hotel, together with new retail, leisure and business facilities will increase activity and footfall in the Town Centre and around the station.
- 9.6 The scheme proposes a distinctive group of buildings that will create a landmark and complete the Slough Station forecourt area. The three buildings are carefully positioned on site to respond to the adjacent buildings and streetscape. The buildings will sit within the emerging cluster of taller buildings in the surrounding area.
- 9.7 The two residential blocks are symmetrical, creating a regularity and formality to the massing and elevations. The roof form is responsive to the emerging Slough skyline and the uses proposed within the building, in particular the creation of amenity spaces and roof terraces.
- 9.8 The design proposes predominantly brick clad elevations to the residential buildings, with a more solid composite panel cladding to the hotel, creating a contrast in texture and colour. Feature metal panels are then introduced into this composition on both the residential blocks and hotel block which creates a unified whole.
- 9.9 The design of the external space seeks to create a year round useable space with pedestrian links through the site connecting the Thames Valley University site and Town Centre to the Station. Hard landscaping materials, consisting of natural stone granite paving would be used which match the

Heart of Slough masterplan. Furniture finish will also take the Heart of Slough palette into consideration.

9.10 Avenue trees will be small leaved lime trees to reflect the town character. Smaller multi stem trees such as Himalayan Birch and Tibetan Cherry will be planted in raised planters to create all year round interest. A mixture of formal and informal planting will be integrated throughout the design including planting to attract birds and insects. Bird boxes will be located throughout the development and installed in planted areas to further attract birds and insects.

9.11 Based on the above the proposal would have an acceptable impact on the character and visual amenity of the area and therefore comply with Policies EN1 and EN2 of the Local Plan for Slough March 2004 (Saved Policies), Core Policy 8 of The Slough Local Development Framework Core Strategy 2006-2026 Development Plan Document, and the requirements of the National Planning Policy Framework 2018.

## 10.0 **Impact on Heritage Assets**

10.1 Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 provides that in considering whether to grant permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. As a consequence the desirability of preservation must be given considerable importance and weight in the decision making process.

10.2 Paragraph 184 of the NPPF 2018 states that Heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

10.3 Paragraph 190 of the NPPF 2018 states that 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 into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

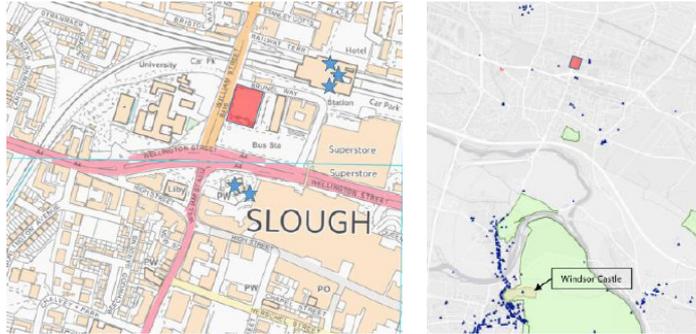
10.4 Paragraph 193 of the NPPF 2018 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

10.5 Paragraph 194 of the NPPF 2018 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional

- 10.6 Paragraph 195 of the NPPF 2018 states that “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
  - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
  - d) the harm or loss is outweighed by the benefit of bringing the site back into use”.
- 10.7 Paragraph 196 of the NPPF 2018 states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.
- 10.8 An Archaeological Desk Based Assessment has been carried out. No World Heritage sites, Scheduled Monuments, Historic Battlefield or Historic Wreck sites are identified within the site or its immediate vicinity. The site does not lie within an area of designated archaeological potential and is considered to have a generally low archaeological potential. Past impacts on the site, in particular the construction and subsequent demolition of the twentieth century Octagon building are likely to have had a severe negative archaeological impact. As such it is not considered that any further archaeological investigation or mitigation measures are required in this particular case.
- 10.9 There are no statutorily listed buildings within the Site, but there are several local buildings nearby, which are as follows:
- Slough Station – booking office, island platform and area manager’s/parcel office (Three separate Grade 2 listings)
  - Church of Our Lady Immaculate and St Ethelbert’s (Grade 2)
  - St Ethelbert’s Presbytery (Grade 2)

The proposal would also be viewed from Windsor Castle and Home Park.



The significance of these heritage receptors has been identified as follows:-

Significance	Historic Built Assets	
<b>High</b>	<p>Scheduled Ancient Monuments with standing remains</p> <p>All Grade I and all Grade II* Listed Buildings</p>	<p>Windsor Castle (Grade 1 listed and Scheduled Ancient Monument)</p> <p>Windsor Castle and Home Park (Historic Park and Garden)</p>
<b>Medium</b>	<p>Grade II Listed Buildings</p> <p>Unlisted buildings that have other exceptional qualities or historic and cultural associations</p> <p>Conservation Areas containing buildings that contribute significantly to its historic character</p> <p>Historic townscape with important historic integrity or settings</p>	<p>Grade 2 listed buildings:</p> <p>Slough Station booking hall, booking office and travel centre</p> <p>Island platform building approximately 25 metres to north of Slough Station booking hall, booking office and travel centre</p> <p>Slough Station area manager's office, traffic assistant's office, and Red Star parcel office</p> <p>Church of Our Lady Immaculate and St Ethelbert</p> <p>St Ethelbert's Presbytery</p>

10.10 The Slough Station listings relate to a combination of their historical association with the Great Western Railway and their intrinsic architectural quality as examples of good Victorian railway architecture. The Council's Heritage Advisor has stated that the development will be seen in context with the main station building from the station forecourt area when looking west however there are other tall buildings as a backdrop to the north of the station and elsewhere, and while the proposed development will

change the setting of the station it is not considered to unduly harm its significance.

10.11 The listings relating to the Church of St Ethelbert and the Presbytery relate principally to their intrinsic architectural value and their group value. The Council's Heritage Advisor has stated that in this case there are several developments approved locally (such as the Queensmere Shopping Centre redevelopment) which will have some impact upon the setting of the church and thus impact upon its significance. The proposed scheme (and other new development) will be seen in wider views of the church from Wellington Street, however due to the separation distance between the site and the church the proposal is not considered to unduly harm its significance.

10.12 Windsor Castle has high significance as a Grade 1 listed building and a Scheduled Ancient Monument. Historic England and the Council's Heritage Advisor have objected to the proposal in respect of the impact on Windsor Castle. This is because the tallest tower, when viewed in the backdrop to the castle from the north, would break the skyline close to the Castle. As a result, this would have an impact on the way in which the Castle is perceived from the Copper Horse. The harm identified to the setting (and significance) of Windsor Castle is assessed to be 'less than substantial' but is at the higher end of 'less than substantial' in the view of the Council's Heritage Advisor. They consider that the harm could be avoided if the 27 storey element was reduced in height to avoid breaking the skyline. Historic England have stated that they would find it difficult to accept the harm as justified unless a compelling reason is given that the development needs to be as high as proposed. Even if a compelling reason is given this harm needs to be weighed against the public benefits of the proposal as required by paragraph 134 of the NPPF.

10.13 There is a specific policy (Policy HE2) relating to Windsor Castle in the Royal Borough of Windsor and Maidenhead Borough Local Plan 2013-2033 Submission Version which states as follows:-

*Development proposals that affect Windsor Castle, as defined on the Policies Map, should be accompanied by a statement showing how the development proposals:*

- a. Seek to enhance the architectural and historical significance, authenticity and integrity of Windsor Castle and its local setting within the Great Park, and*
- b. Safeguards the Castle and its setting within the Great Park allowing appropriate adaptation and new uses that do not adversely affect the Castle, The Great Park and their settings, and*
- c. Protects and enhances public views of the Castle from those further afield.*

It should be noted that while this policy seeks to protect and enhance public views of the castle and its setting within the Great Park, there are no specific protected views of Windsor, unlike, for example, St Pauls Cathedral where distances from the building and viewpoints are identified.

10.14 In light of the objections from Historic England and the Council's own heritage advisor, it is important to be aware of how the Local Planning

Authority should proceed where there is harm to a heritage asset. Historic England have confirmed in this case that they consider that there is less than substantial harm to the designated heritage asset.

- 10.15 The definition of the “Setting of a heritage asset” is explained in paragraph 18a-013-20140306 of the Planning Policy Guidance under the heading “what is the setting of a heritage asset and how should it be taken into account?” This is set out below.

A thorough assessment of the impact on ‘setting’ needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive in area than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.

- 10.16 In the case of *Catesby Estates Ltd and SSCLG v Steer* [2018] EWCA Civ 1697 the Court of Appeal has confirmed that the setting of heritage assets "is not necessarily confined to visual or physical impact" but that other considerations are potentially relevant.

The Court of Appeal identified three general points which apply in setting cases:

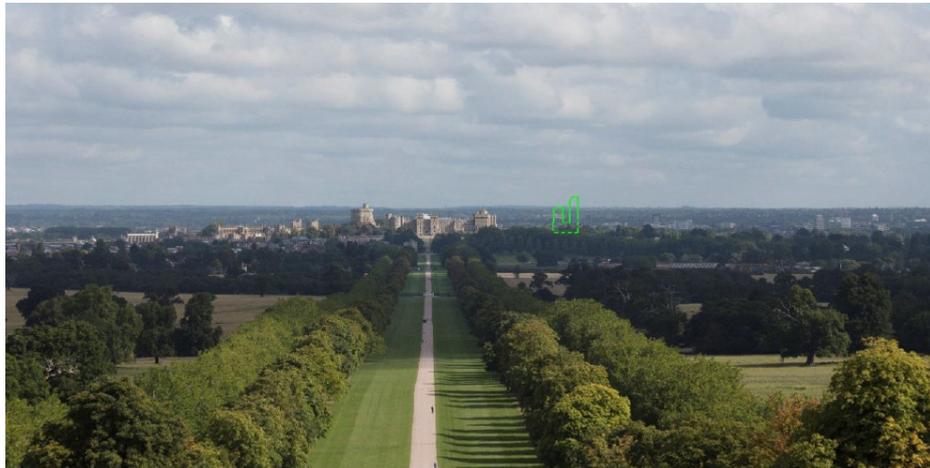
- Section 66(1) of the Listed Buildings Act 1990 requires the decision-maker to understand what the setting of the asset is – even if its extent is difficult or impossible to delineate exactly – and whether the site of the proposed development will be within it or in some way related to it.
- Although the exercise is not purely subjective, there is not (and could not be) a single approach to identifying the extent of a heritage asset’s setting. The decision-maker must apply planning judgement, having

regard to relevant policy, guidance and advice. It is necessary to concentrate on the ‘surroundings in which the heritage asset is experienced’, keeping in mind that those “surroundings” may change over time, and also that the way in which a heritage asset can be “experienced” is not limited only to the sense of sight.

- “The effect of a particular development on the setting of a heritage asset – where, when and how that effect is likely to be perceived, whether or not it will preserve the setting of the listed building, whether, under government policy in the NPPF, it will harm the “significance” of the listed building as a heritage asset, and how it bears on the planning balance – are all matters for the planning decision-maker”, subject to the requirement to give considerable importance and weight to the desirability of preserving the setting of a heritage asset. Unless there has been some clear error of law in the decision-makers approach, the court should not intervene.

10.17 The applicant has submitted a Heritage, Townscape and Visual Impact report which has identified Windsor Castle and Park as having high significance. The assessment is that there will be a minor impact on Windsor Castle and that the impact on significance is moderate/slight. The report states that there will be a “Noticeable change to setting, with the new building introducing a new tall development in the background to this view, albeit alongside several other tall buildings, particularly Queensmere, and, directly behind the castle, the Thames Valley University development. But limited impact given cumulative effect and distance”. The report states that Windsor Castle is remote from the application site and that while the proposal goes above the skyline in the view from the Copper Horse statue, so too does Queensmere.

10.18 The view from the Copper Horse of the proposed building is shown below.



10.19 The view from the Copper Horse of the proposed building with other approved developments is shown below.



- 10.20 Following the objection from Historic England the applicants heritage consultant provided further information. They stated that the proposal does not involve the loss of the Grade 1 Listed Building or Schedules monument. The magnitude of the impact is because of the degree of visibility of the proposal in the lateral background part of the view of the castle.
- 10.21 The applicants consultant points out that these are not the only buildings in the lateral background view that exceed the skyline – others are Brunel Place and all but one of the Queensmere towers. In this cumulative context they consider that it is difficult to judge how the impact of this one proposed building can be seen as “substantial”. They state that the only reference Historic England make is the fact that it is closer to Windsor Castle in this view. In fact the building is 4.5 degrees closer than the easternmost Queensmere building and approximately 1.5 degrees closer than the eastern Brunel Place building. They consider that the scheme creates “less than substantial harm” to the setting of Windsor Castle in this view and needs therefore to be tested against NPPF para 134 – i.e. weighed against the public benefits of the proposal. (For info Para 134 referred to by the applicants consultant is in the NPPF 2012).
- 10.22 In this particular case, Historic England were asked to confirm if they considered there was substantial or less than substantial harm – and they have confirmed that there would be less than substantial harm, although they state that they consider that it is at the higher end of ‘less than substantial’. It should be noted that ‘less than substantial’ does not necessarily mean insignificant, and any harm, as a matter of law, must be given considerable importance and weight in the overall balance.
- The development now needs to be tested against Para 196 of the NPPF 2018 which states that:
- “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.
- 10.23 Public benefits of a proposal could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework:-

a) Economic – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity and by identifying and coordinating the provision of infrastructure

b) Social – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well being

c) Environmental – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy

10.24 The public benefits put forward by the applicant are set out below, with a corresponding Officer response:

<b>Public Benefit</b>	<b>Officer response</b>
<p>Improving the image of Slough Town Centre by delivering a high quality mixed-use scheme on a vacant site that has little or no prospect for office development, which has been vacant except for parking for some time and creates a poor perception of Slough upon arrival</p>	<p>Both the NPPF and policies of the Core Strategy and the Local Plan require high quality developments that make the most efficient use of the land. It is therefore a requirement of policy to deliver such development. However, as set out in this report harm has been identified to the setting of Windsor Castle and great weight should be given to the asset's conservation.</p> <p>The site has remained vacant for a long period of time, is used as a temporary car park and is surrounded by hoardings – this is considered to be detrimental to the character and visual amenities of the area, giving the impression of urban blight in the immediate area and therefore likely to be prejudicial to the councils aspirations for regeneration of the area.</p> <p>It is considered that this is a public benefit and moderate weight should be afforded to this.</p>
<p>Incorporating a new, lively pedestrian route within the site to improve connectivity with the Thames Valley University site and beyond, whilst knitting the development into the Heart of Slough</p>	<p>Both the NPPF and policies of the Core Strategy and the Local Plan require high quality developments that make the most efficient use of the land and provide connectivity. It is therefore a requirement of policy to deliver such development. However, as set out in this report harm has been identified to the setting of Windsor Castle.</p>

Masterplan	It is not considered that this is a public benefit. No weight should be afforded to this.
Creating a new public space for people to meet, greet and linger, and complement the functions of the offices, bus and train stations	Both the NPPF and policies of the Core Strategy and the Local Plan require high quality developments that make the most efficient use of the land. It is therefore a requirement of policy to deliver such development. However, as set out in this report harm has been identified to the setting of Windsor Castle.  It is not considered that this is a public benefit. No weight should be afforded to this.
Providing active frontage onto Brunel Way and the new pedestrian link to create an attractive and lively environment	It is agreed that this would be a public benefit given the desire to regenerate the Town Centre. However this has not been quantified by the applicant.  Moderate weight should be afforded to this.
Increase activity around the stations and complementing the substantial new office provision under construction in the area	It is agreed that this would be a public benefit given the desire to regenerate the Town Centre. However this has not been quantified by the applicant.  Moderate weight should be afforded to this.
Delivering high-quality Build to Rent (BTR) accommodation, meeting the unmet needs of the local housing market, particularly office workers in the Town Centre	A total of 343 Build to Rent Units would make a contribution to housing delivery in the Borough and would provide longer term rented accommodation for those not in a position to buy a property.  Moderate weight should be afforded to this.
Adding to the vitality of the Town Centre and increasing local activity	It is agreed that this would be a public benefit given the desire to regenerate the Town Centre. However this has not been quantified by the applicant.  Moderate weight should be afforded to this.
Providing a new hotel development with leisure and business facilities in a high accessible location to reinforce and enhance Slough as an office destination	It is agreed that this would be a public benefit given the desire to regenerate the Town Centre. However this has not been quantified by the applicant.  Moderate weight should be afforded to this.
Creating a marker for the rail and bus stations that is otherwise lacking	Both the NPPF and policies of the Core Strategy and the Local Plan require high quality developments that make the most efficient use of the land and provide. It is therefore a requirement of policy to deliver such development. However, as set out in this report harm has been identified to the

	setting of Windsor Castle it is not considered that this is a public benefit. No weight should be afforded to this.
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In addition to the public benefits put forward by the applicants, it should be noted that as well as providing the Build to Rent units, the proposal includes a contribution of £7.6 million towards the provision of affordable housing.

It should be noted that the NPPF 2018 in para 64 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership – Exceptions to this 10% requirement should be made where the site or proposed development (amongst other things) provides solely for Build to Rent homes. Build to Rent homes are included in Annex 2 of the NPPF 2018 as a form of affordable housing and therefore the provision of Build to Rent Homes on the site plus the substantial contribution towards affordable housing is considered to be a significant public benefit.

Slough Councils Core Strategy requires proposals for high density housing to be located in Slough Town Centre, which ensures that the majority of development takes place on previously developed land in the most sustainable location. The Heart of Slough area, which surrounds the site on three sides, seeks comprehensive development which will regenerate the Town Centre. Development on this site, which will contribute to the aims of the spatial strategy and the regeneration of the Town Centre, is considered to be an important public benefit.

When taken together in the round there are a number of public benefits which would be provided by the proposal, in particular improving the character and visual amenities of the area and helping to meet Sloughs aspirations to regenerate the Town Centre. It is considered that these public benefits would outweigh the harm that the proposal would cause.

#### 11.0 **Housing Mix/Affordable Housing**

- 11.1 One of the aims of national planning policy is to deliver a wide choice of high quality homes and to create sustainable, inclusive and mixed communities and this is also largely reflected in local planning policy in Core Strategy Policy 4. The plans submitted to the council are for 343 residential units, consisting of 32 studio flats, 165 1-bed flats and 146 2-bed flats.
- 11.2 The Council does not have a specific adopted policy on what constitutes an acceptable mix of accommodation, however given the town centre location it is considered that a mix of studios, 1 bedroom and 2 bedroom units is satisfactory.
- 11.3 The Council's Core Strategy Policy 4 requires all sites of 15 or more dwellings to provide affordable housing at between 30-40% of the total number of dwellings proposed. The Council's guidance sets out its preference for on site affordable housing delivery. However this policy is considered alongside the Developer's Guide which was last updated in September 2017, which although it sets a preference for new affordable housing to be provided on site recognises that there may be some

exceptional circumstances in which the provision of affordable housing off site will be more beneficial.

- 11.4 The Housing officer has set out that there are exceptional circumstances in this case:-
- The Private Rented Sector Model of housing provision proposed, in particular the long term management arrangement for letting and servicing, would not lend itself easily or securely to the nomination and rental regimes of the Council or other Registered provider, such that the dwellings could be reliably classed as “affordable” in perpetuity.
  - The proposed spaces provision and layout arrangements for the majority of the flats would not match nationally described space standards, so the scheme would need substantial redesign, likely resulting in a reduction in the number of units overall if on site AH provision was to be made
  - A Bespoke contribution of £7,618,000 has been calculated to provide off site affordable housing. Agreement to full payment on commencement will meet the developers obligation on Affordable Housing and no further contribution will be required provided that the flats remain as PRS under a single management and operating body.

Accordingly, subject to payment of the calculated contribution, the affordable housing requirements for this particular scheme are considered to satisfied.

12.0 **Living conditions for future occupiers of the development**

12.1 Build to Rent is a relatively new and emerging form of residential accommodation, which is designed and built specifically for rent rather than for sale. The layout of the units is open plan, with built-in storage, bathroom and wardrobe provision. The primary motivation of investors is to keep their buildings fully-occupied with satisfied tenants. That means offering longer but flexible tenancies and good on-site amenities, close to transport links for easy commuting.

12.2 The Build to rent accommodation is centrally-managed with back of house provision including cycle stores at ground and basement levels and general residential storage at ground floor level.

12.3 The application proposal includes studio, one bedroom/two person and two bedroom/four person units. These are generally slightly smaller than the national standard, as follows:

<b>Type</b>	<b>Proposed no</b>	<b>Size range</b>	<b>National standard</b>	<b>Comments</b>
Studio	32	33m2 - 37.5m2	None	Exceeds typical local standard elsewhere of 30m2
1B 2P unit	165	44m2 - 48m2	50m2	4-12% below
2B 4P units	146	67m2 - 69.5m2 with 14@75.5m2	70m2	1-4% below apart from larger units

Sloughs guidelines for flat sizes are as follows:-

<b>Type</b>	<b>No.</b>	<b>Size range</b>	<b>Sloughs minimum standards</b>	<b>Comments</b>
Studio	32	33m <sup>2</sup> - 37.5m <sup>2</sup>	31.67 sq m	All Exceed
1B 2P unit	165	44m <sup>2</sup> - 48m <sup>2</sup>	Living room 14.86 sq m  Bedroom 11.14 sq m  Kitchen 5.57 sq m  Total Floorspace = 31.57 sq m	All Exceed total floorspace of 31.57 sq m.  The units are laid out with the kitchen/dining area/sitting area as one room. Each has a separate bedroom and bathroom.
2B 4P units	146	67m <sup>2</sup> - 69.5m <sup>2</sup> with 14@75.5m <sup>2</sup>	<u>2 Bed Flat (4 Persons)</u>  Living -18.58 sq m  Bedroom 1 -11.14 sq m  Bedroom 2 – 10.02 sq m  Kitchen - 5.57 sq m  Total Floorspace = 45.31 sq m	All Exceed total floorspace of 45.31 sq m.  The units are laid out with the kitchen/dining area/sitting area as one room. Each has two separate bedrooms and bathrooms.

The proposal is considered to provide satisfactory living conditions for future occupiers of the flats. The flat sizes exceed Sloughs minimum standards and the majority of units meet the Governments National space standards.

- 12.4 The entrance desk and reception has a 24-hour concierge with post boxes. In addition, the facilities include a communal lounge with flexible seating arrangements, business lounge, gymnasium, cinema room, games room, dining areas and external communal terraces. These ancillary facilities amount to some 784m<sup>2</sup> plus a further 485m<sup>2</sup> of external terrace space at roof level.

- 12.5 Satisfactory levels of car and cycle parking have been provided and the site is sited in very close proximity to the train and bus stations, and the shops and facilities within the Town Centre.
- 12.6 Although the private amenity areas provided are small, there is public open space between the buildings and the proposal is within walking distance of Salt Hill Park. In addition facilities for residents include a lounge, business lounge, gymnasium, cinema room, games room and dining areas.
- 12.7 The daylight and sunlight is generally acceptable, although the daylight to external amenity areas is more limited. Mitigation measures, mainly consisting of planting areas will ensure that there is an acceptable wind microclimate around the buildings, so that the public open space can be enjoyed.
- 12.8 Mitigation measures will ensure that air quality and noise issues are acceptable.
- 12.9 Issues concerning highways, daylight and sunlight, wind microclimate, air quality and noise are considered in more detail in separate sections of the report. The proposal is considered to provide satisfactory living conditions for the future occupiers of the residential units.
- 13.0 **Daylight and sunlight**
- 13.1 The NPPF mentions daylight and sunlight only at paragraph 123; this states that if there is an existing or anticipated shortage of land for meeting identified housing needs that "...when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site...". The NPPF is silent on the approach that should be taken if there is not an existing or anticipated shortage of land for meeting identified housing needs, although does seek to ensure that proposals provide a well designed environment.
- 13.2 There are no mandatory standards for daylight or sunlight to dwellings, but a number of publications provide guidance. The guidance documents give advice on minimum recommended average daylight factors in habitable rooms in dwellings and give recommendations for sunlight to interiors, based on the percentage of annual probable sunlight hours.
- 13.3 A report was submitted with the application assessing the daylight and sunlight within the proposed buildings and the sunlight to the proposed amenity spaces.
- 13.4 The daylight results in the report states that 115 of the 130 rooms tested (88%) would meet their relevant ADF target and that the level of ADF compliance across all habitable rooms in the proposed development would be 94.5%. It states that the BRE numerical guidelines are intended to be applied flexibly since natural daylight is only one of many factors in site layout design.
- 13.5 The sunlight results show that 78 of the 130 rooms tested (60%) would meet the BRE targets of 25% total APSH with 5% available during winter months.

The report points out that the focus of the BRE sunlight guidelines is on main living rooms, rather than bedrooms and kitchens, which the guide views as less important.

- 13.6 The proportion of amenity space achieving the twohour guideline on 21 March is 18.2%; the BRE target is 50%. The report states that the hotel block to the south is a significant factor in this result and therefore a second set of figures for 21 June has been produced which shows that 80% of the area would receive at least two hours of sun on 21 June when there is a greater expectation of sunlight availability.
- 13.7 In response to the issues raised by the Council's consultant, further information was submitted by the applicant. In respect of the sunshine reaching the private amenity space, the following points were made:-
- Although the outdoor amenity space received less sunlight than the BRE guidance, this was not unusual and was the case for many urban spaces across the country, but did not prevent their use and enjoyment.
  - The additional information presented for June 21<sup>st</sup> should not be considered in isolation; additional information is also provided for April, May and June. Together these show a more detailed and informative picture across those months (when the amenity space is most likely to be used) than the BRE 2 Hour Sun on Ground test.
- 13.8 In respect of the potential impact from development proposed on adjoining sites, the following information was provided:-
- William Street is 31m wide at this point (to the rear of the footways on either side), so this will allow significant light penetration to the western side of the Station Square development, whatever the scale of development on the TVU site. It would be conventional to test Station Square in a cumulative scenario if there were a detailed scheme for the TVU site with planning permission (or submitted for approval) but not otherwise; there is only an outline planning application with indicative massing, as included in the Visual Impact Assessment. The alternative would be the theoretical 'mirror massing' type exercise cited in the BRE guide. The ADF results for the west tower would be of limited value if tested in such a scenario, however, as any scheme coming forward on the TVU site is unlikely to be of that massing.
- 13.9 Paragraphs 6.4 and 5.3 of the 8 September report confirm that the ADF calculations include a maintenance factor allowing for the effects of dirt. Using light coloured surfaces and having rooms unobstructed by furnishing is accepted methodology for ADF testing. In any case, as a managed Build-to-Rent scheme, residents will not be allowed to decorate their apartments.
- 13.10 The solid glazing ratio is typical of this type of residential building and achieves an appropriate balance between daylighting and overheating. Required thermal performance of walls and windows will be specified at the detailed design stage. There are opening louvres to enable purge venting as necessary in the summer months, as well as MHVR systems. Watkins Payne advises that the louvres will provide purge ventilation that more than meets the relevant guidance on overheating.
- 13.11 The overall conclusion of Anstey Horne's September report was that the level of ADF and ASHP compliance achieved across the scheme were "very

good for an urban location". The amended apartment layouts improve the levels of compliance.

13.12 Addition information presented for April, May and June shows a detailed and informative picture of the levels of direct sunlight the public square received during these months.

13.13 It is untenable to suggest that elevational treatment and fenestration in particular should be entirely driven by sunlight considerations. The scheme achieves a sensible balance between maximising daylight and sunlight while minimising overheating. The solid:glazing ration is typical of a residential building of this type. The required thermal performance of walls and windows will be specified at the detailed design stage. There are opening louvres to enable purge venting as necessary in the summer months, as well as MHVR systems.

13.14 The Councils consultant has responded to the additional information and stated the following:-

- My main concern is the window sizes and solar overheating, particularly of single aspect apartments without cross ventilation cooling. Their M&E advisors are quoting the wrong CIBSE overheating assessment method and present no evidence reassurance
- I have done some further investigations and found their daylight calculations do not adequately follow the BRE methodology they reference. This means most of their daylight predictions are of the order of 60% higher than would typically occur in practice. In addition there appears to be a significant risk of apartment overheating, which reading between the lines of the Applicant's response, they do not appear to have properly assessed. You may wish to consider the following:
  - The Applicant to reassess the room daylight calculations using room reflectances recommended by the referenced BRE methodology.
  - The Applicant to carry out a CIBSE TM59 overheating assessment to ensure the apartment windows (and hence solar heat gain) are of an appropriate size. I suspect the single-sided may need a reduction in window area and hence façade layout.

13:15 The comments from the councils consultant are noted. However, there are no minimum daylight and sunlight standards. The units are proposed as rented accommodation rather than permanent homes and the owners would have control over internal decoration that could affect room reflectances. The main concerns raised were over daylight to the external amenity areas and potential overheating. The site is within walking distance of Salt Hill Park and so impact on the external amenity areas is not considered sufficient to justify refusing planning permission and more information is provided on potential overheating in the section on noise and potential overheating issues.

13:16 A condition would be needed to ensure that the units remained as rented accommodation and subject to this the proposal is considered to provide adequate daylighting and sunlighting to the residential units.

14.0 **Potential wind tunnel effect due to height of buildings**

- 14.1 The proposed development is taller than its immediate surroundings with a relatively open area to the south-west, where the prevailing wind originates throughout the year. Therefore it is expected that winds will be down draughted by the proposed development and channel/accelerate around the blocks and between them creating locally higher wind speeds.
- 14.2 Wind tunnel testing is the most well established and robust means of assessing the pedestrian wind microclimate with the proposed development in place. Any mitigation required to provide an acceptable wind environment for the intended amenity uses is developed through wind tunnel testing and revised landscaping details prepared accordingly.
- 14.3 The following cumulative schemes were also included:-
- Brunel Place
  - Queensmere
  - Library site
  - TVU site
- 14.4 There are several locations in and around the proposed development that will require mitigation. The majority of thoroughfares were suitable for their intended use but a number of receptors had strong wind exceedances.
- 14.5 The report concludes that all locations in and around the site were suitable for their intended use with sitting to strolling wind conditions. There were no exceedances of the safety threshold. However localised areas of windier than desired conditions and strong wind exceedances will require mitigation; these measures are to be wind tested in order to assess their effectiveness and develop them as necessary.
- 14.6 The wind tunnel testing resulted in definitive mitigation planting. The massing of the hotel was amended in May 2018 and the final report wind tunnel tested this revised massing and put forward mitigation planting accordingly. The architectural drawings show a solid fence on the eastern side of the service yard, while retaining some permeability elsewhere to retain a degree of passive surveillance of this area. The proposed wind mitigation is reflected in the landscaping drawings submitted alongside the addendum wind assessment.
- 14.7 The wind tunnel tests included numerous locations in the roadways around the application site. The only off site locations with as residual annual wind impact after mitigation is the traffic island in the bus station approach; cyclists and private cars are not permitted to use this area. Cyclists using Brunel Way and William Street would have a good level of comfort, equivalent to standing or strolling on foot, even in the windiest season. The main criterion used currently for cyclist is the strong winds threshold (15m/s). This was not exceeded in any areas accessible to cyclist.
- 14.8 The consultants suggest that a condition could be used for the selection of wind resistant window furniture, given manually operated naturally ventilation windows form a key part of the overall building design.
- 14.9 The applicants have now provided detailed mitigation measures including heights and types of trees and planting which is proposed. Subject to a condition requiring works to be carried out in accordance with the detailed

mitigations, the proposal is considered acceptable in respect of wind microclimate.

15.0 **Air quality**

15.1 Paragraph 170 of the NPPF 2018 states that planning policies and decisions should contribute to and enhance the natural and local environment by (amongst other things):  
“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality...”

15.2 An Air Quality Assessment has been submitted with the application. This assesses the suitability of the site for the proposed development and whether any significant air quality impacts are expected as a result of the construction and operation of the proposed development. The proposed development is located adjacent to AQMA4 – Town Centre.

15.3 The Air Quality Assessment concludes that the proposed development does not raise any significant or other residual adverse impacts on the health and/or quality of life for existing or proposed sensitive receptors as a result of any anticipated changes to air quality. Mitigation measures have been proposed for construction traffic and stationary plant associated with the proposed development.

15.4 The Council’s Environmental Quality Team Manager has provided detailed comments on the proposal which are set out in the consultation responses section of the report. In summary, the main points raised are as follows:-

- The Octagon scheme is considered to have a MAJOR air quality impact classification. When interpreting scheme impacts it is important that SBC also uses local knowledge to identify significant issues. It is probable that the Town Centre AQMA will require extending to incorporate the scheme.
- It is considered that, with suitably designed scheme mitigation, including off-set mitigation in line with the Slough Low Emission Strategy, the development proposal can be made acceptable in terms of both managing exposure and the impact of the scheme on air quality concentrations.
- The proposals include the provision of Travel Plans for both the residential and hotel aspects of the scheme, including provision for cycling & walking and a car club. These proposals are welcomed, however, given SBC plans to develop electric car clubs in the Town Centre, further consideration is needed as to how the scheme proposals and SBC plans for car clubs can be combined into an integrated provision throughout the Town Centre, including the provision of rapid electric charging units and electric vehicle bays and laybys close to the scheme.
- The proposals include 20% active and 20% passive provision of electric charging units. While the application proposes reduced car parking provision, it is not clear how residential parking spaces will be allocated. Where a parking space is to be allocated to a dwelling we would expect a 100% provision of operational charging points from scheme opening. Additionally, with the Governments planned requirement that new cars be zero emission capable from 2040, the proposals should include a strategy

for increasing electric vehicle charging provision after scheme opening. This information should be provided within the Travel Plan. Consideration should be given to criteria for increasing on-site provision or providing off-set mitigation, in conjunction with SBC, to increase public charging facilities in the vicinity. The type of electric charging points provided should be in line with the Slough LES and agreed with SBC

- The Travel Plan should include details of how the take-up of plug-in vehicles can be promoted and monitored, including criteria for increased provision
- The applicant should submit details of either a Construction Environmental Management Plan (CEMP) or similar robust code of construction practice to be followed during the construction phase, including:
  - All construction related vehicles shall be a minimum Euro 6/VI Standard
  - All relevant non-road mobile machinery (NRMM) shall comply with the emission standards in table 10 in the LES guidance
  - SBC will seek a Section 106 contribution (or other obligation) of £250,000 to secure off-set mitigation that is proportional to the emission increases arising from the scheme. We proposed to combine these contributions/obligations with highway S106 contributions.
  - The package is considering the following:
    - S106/S278 Provision and building and extending of 6 new low emission laybys around Brunel Way (map to be produced)
    - S106/S278 Provision of signage, bay markings and associated TROs
    - S106/S278 Provision and installation and DNO connection for Rapid EVs servicing the low emission laybys around Brunel Way
    - S106 EV infrastructure to service:
      - 2 EV car clubs bays -
      - 2 dedicated EV Taxi Bays and Rapid Chargers
      - 2 Public EV bay – replacement of existing Rapid Charger
  - S106 EV infrastructure management and operation to be transferred to the Councils appointed operators
  - S106 Financial contribution towards future EV bus infrastructure within the bus station of £150,000
  - S106 Financial contribution towards Highway Improvements in Brunel Way of £x (tbc)

15.5 The measures will contribute towards the following Low Emission Programmes:

- Taxi EV infrastructure
- Public Rapid Charger Infrastructure
- Town Centre EV Car Club
- Electric Bus Programme (A4 SMaRT)

15.6 Subject to the provision of satisfactory mitigation measures, the proposal is considered acceptable in terms of air quality.

## 16.0 **Noise and potential overheating issues**

16.1 Paragraph Paragraph 170 of the NPPF 2018 states that planning policies and decisions should contribute to and enhance the natural and local environment by (amongst other things):

“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. ...”

- 16.2 A Noise and Vibration Assessment was submitted with the planning application. The principal noise sources affecting the site are road and rail traffic with the highest noise levels experienced on the western side of the site (overlooking Stoke Road) and on the northern side of the site (looking towards the railway). The noise assessment concludes that the most appropriate acoustic design response to the site will be through the provision of appropriate sound insulation to the external envelope.
- 16.3 The suitability of the site has been considered and assessment concludes that the site is a “medium” risk, so is suitable for residential development, subject to adherence to a good acoustic design process and the implementation of appropriate noise mitigation.
- 16.4 Noise intrusion will be controlled using appropriately specified external wall constructions, including windows with acoustic double glazed units and alternative means of ventilation.
- 16.5 All flats will be provided with mechanical ventilation (MVHR) systems and the provision of such units will enable windows to remain closed and subject to the satisfactory specification of external building fabric elements should provide effective control over noise ingress during normal occupation.
- 16.6 Provision is made for purge ventilation, which is the process of removing high concentrations of pollutants and water vapour released from occasional activities (such as painting and decorating) or accidental releases (such as smoke from burnt food or spillage of water. Since the need for purge ventilation is “occasional” this is achieved by giving residents the ability to open windows. Whilst noise will increase as a result of windows being opened, occupants are “in control” of both the timing and duration of purge ventilation being required. Windows may also need to be used to provide “rapid” ventilation to facilitate cooling of the premises if there is a significant risk of flats overheating.
- 16.7 To minimise the potential need for windows to be opened to provide thermal comfort, the MVHR units will be specified to include a “boost” operating condition which will provide an increased level of ventilation. These units need to be sited appropriately within the flats and include appropriate attenuation.
- 16.8 The applicants consultant acknowledges that it is difficult to undertake a detailed assessment of overheating risks at the planning stage of a development. The consultant recommends that additional potential options to further minimise overheating should be explored at the detailed design phase of the development to establish any further mitigation that might be deliverable to further reduce the amount of time the development might be reliant on natural ventilation to control overheating such as:-
- Utilising the benefits of additional thermal mass in the design, for example concrete floors
  - Using “Low E” glass to minimize solar gains through windows

- Solar shading and shutters to reduce the heating effect of the sun
- Use heat reflective finishes on walls and roofs

16.9 It is clear from comments from the applicants consultant and the councils expert that, while noise can be mitigated, there is a balancing act between noise mitigation and providing ventilation and cooling to the residential units, which is likely only to be resolved at the more detailed design stage. Subject to conditions on detailed design, the proposal is considered acceptable in terms of noise mitigation and issues of overheating.

17.0 **Highways/transport and parking**

17.1 Paragraph 106 of the NPPF 2018 states that in town centres local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

17.2 Paragraph 108 states that in assessing specific applications for development, it should be ensured that:

- a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) Safe and suitable access to the site can be achieved for all users; and
- c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree

17.3 Paragraph 109 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

17.4 Paragraph 110 of the NPPF states development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport and appropriate facilities that encourage public transport use. It also states applications for development should create places that are safe, secure and attractive, minimising conflicts between pedestrians, cyclists and vehicles and allow the efficient delivery of goods and access by service and emergency vehicles. Development should also be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

17.5 The Transport and Highways officer has provided detailed comments which are set out in detail in the consultation section of this report. The main points are set out below.

17.6 The site is currently being used as a car park using a vehicular crossover on Brunel Way close to its junction with William Street. The proposal seeks to close off this crossover, instead using a new access off the Bus Station access road which is to be designed to better suit the needs of the proposed development. The applicant needs to agree a financial sum with SBC assets team to secure access rights to the development.

- 17.7 Although the proposed access is acceptable in principle, this needs to be widened by 1m along its length as it is currently difficult for buses to pass. In order to prevent taxi's and other vehicles dropping off on the bus station access road, it will be necessary for the applicant to provide a drop-off facility.
- 17.8 The car parking and cycle parking proposed is considered to be satisfactory and complies with local plan parking standards. The applicants will need to provide 11 electric vehicles charging points/bays within the car park. Paths, planters, trees, street furniture, etc within the public highway will need to be taken from the Heart of Slough materials palette.
- 17.9 The concerns of the bus company are noted, the car park capacity has been reduced and there is unlikely to be a large number of traffic movements at any one time. The entrance to the car park needs to be clearly signed and marked. The height of the undercroft is designed to ensure the largest vehicles expected to access the site can so easily.
- 17.10 The residential and hotel travel plans need further work, and more detailed travel plans should be secured prior to occupation; these travel plans need to be secured by a Section 106 Agreement.
- 17.11 A pedestrian crossing has been proposed on William Street by the applicant, this crossing is in addition to existing crossings. It is not considered that there is a strong enough desire line and justification for an additional crossing.
- 17.12 A car park management plan and a construction management plan will need to be secured.
- 17.13 Contributions and Highways works are sought from the developer and these are:-

#### Section 106 Contributions

- £500k transport contribution towards Brunel Way walking, cycling, access and public realm improvements (prior to commencement)
- £150K Transport contribution towards the electrification/infrastructure of the Bus Station to support Electric Buses (prior to commencement)
- £\* implementation of traffic regulation orders (prior to commencement)
- £12,000 Travel Plan contribution (£6,000 residential and £6,000 hotel) prior to occupation
- Travel Plan (submitted prior to occupation or within 6 months of first occupation)
- Bus Lane / Bus Station Access Road monitoring contribution to fund the enforcement of vehicular entry to the bus station.
- Residents excluded from being eligible for on-street parking permits;

#### Highways works

- Temporary construction access point(s)
- Widening of Slough Borough Council owned Bus Station access road by 1m
- Reconstruct the footways fronting the application site with Heart of Slough natural stone paving in keeping with the remainder of the public realm area

- Streetlighting installation/modifications on the Bus Station access road
- Reinstatement of redundant access point on Brunel Way to footway construction using Heart of Slough Paving
- Installation of any street lighting modifications (as necessary)
- Refreshing and Installation of road marking modifications (as necessary)
- Drainage connections (as necessary);
- Gully cleaning (nearest gullies around the site and site access);
- Construction of drop-off point for application site
- Construction of Taxi layby extension for EV Taxis as shown on plan SBC/TFS/HT/P01 including 1no 2-way EV rapid charger
- Extension of layby on Brunel Way to provide a total of 3no EV bays for car club & charging as shown on plan SBC/TH/HT/P01 to include 2no rapid chargers
- Provide 2no EV bays for Car Club & charging on Brunel Way opposite railway station as shown on plan SBC/TFS/HT/P01 including 1no 2-way EV rapid charger.

17.14 Subject to amendments, additional information, highway works and contributions, there are no objections to this application from a Transport & Highways perspective.

17.15 Modelling work has been carried out. The models were developed subsequent to pre application discussions where trip rates and modelling approach were agreed. The LinSig assessment included nine junctions in relation to the proposed development. Upon review of the model constructions there are a number of general clarifications that are required and the modelling work would need to be provided and the model re-run before a decision notice could be issued.

17.16 Subject to the amendments to the proposal including the modelling work, additional information, highway works and contributions, the proposal is not considered to be detrimental to highway and pedestrian safety.

## 18.0 **Flood Risk and Surface water drainage**

18.1 A Ministerial Statement from December 2014 confirms the Governments commitment to protecting people from flood risk. This statement was as a result of an independent review into the causes of the 2007 flood which concluded that sustainable drainage systems (SuDS) were an effective way to reduce the risk of “flash flooding”. Such flooding occurs then rainwater rapidly flows into the public sewerage and drainage system which then causes overloading and back up of water to the surface.

18.2 Both Core Strategy Policy 8 and paragraphs 155 and 163 of the NPPF 2018 require development to be directed away from areas at highest risk off flooding and to ensure flood risk is not increased elsewhere. Paragraph 165 of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The Government has set out minimum standards for the operation of SuDS and expects there to be controls in place for ongoing maintenance over the lifetime of the development.

- 18.3 A Flood Risk Assessment and a Surface Water Management Plan have been submitted with the application. The site lies within Flood Zone 1 where there is a less than 0.1% (1 in 1000) chance of tidal/fluvial flooding. The site is at very low risk of fluvial and low risk of surface water flooding.
- 18.4 The proposed development will use Sustainable Drainage Systems (SuDS) in the form of green roofs and cellular storage. A green roof is proposed to be installed on the roof of the hotel building and the areas of the residential tower roofs not utilised as terraces or for accommodating building services equipment possibly available for extensive green roofs, to be determined as part of detailed design.
- 18.5 Attenuation and emergency storage totalling 500m<sup>3</sup> will be provided in the form of underground storage such as cellular tanks beneath the basement car parking.
- 18.6 It is proposed to store surface water flows from the development using attenuation tanks and green roofs and restrict the flow to 5 l/s to discharge to the public surface water sewer.
- 18.7 It was considered that a large amount of green roof would be more appropriate than blue roof as it reduces the amount of attenuation required and provides a greater benefit to amenity and biodiversity. The remainder of the roof area is proposed for plant and amenity areas that are split up over various levels. Due to this the provision of blue roof in these smaller areas would not be very efficient.
- 18.8 The applicants have undertaken pre development enquiry with Thames Water in which they indicated no objection to accepting a surface water flow from the development of up to 50% of the existing runoff rate and have proposed the lower 'greenfield' rate of 5l/s. A S106 application would be made to Thames Water for the connection to a public sewer during the detailed design stage.
- 18.9 The podium drainage will be picked up through a series of gullies that will combine at high level at discharge to the basement drainage network via roof water pipes, however this design would be part of the building Services Engineers remit and would need to be as per their requirements.
- 18.10 The pump and hydrobrake are provided together due to advice the applicants have received on previous projects from pump manufacturers that in some instances a pump station will provide a variable flow rate and if a hydrobrake is provided the restricted discharge rate can be ensured.
- 19.0 **Sustainable design and construction**
- 19.1 An Energy Strategy has been submitted. The energy strategy prioritises the reduction in energy consumption and hence CO<sub>2</sub> emissions through the building envelope design together with the use of efficient mechanical and electrical services.
- 19.2 The focus of the energy strategy is on CO<sub>2</sub> reduction from the building by adopting a highly efficient building envelope solution together with high efficiency mechanical and electrical services incorporating heat recovery

where possible. The LZC technologies assessment is based on using solutions that are technically proven with low maintenance implications taking into account the energy efficiency strategies being proposed in the current design.

- 19.3 This is achieved by the following elements:
- High performance glazing
  - Improved building fabric thermal insulation
  - Low building air leakage rate (3m<sup>3</sup>/hr/m<sup>2</sup> at 50 Pa which represents a 70 % improvement over the minimum 2013 Building Regulations requirements)
  - Whole house mechanical supply and extract ventilation systems in each apartment with integral heat recovery
  - Variable speed fans and pumps
  - Low energy lighting (LED lamp sources) with PIR occupancy control and daylight dimming
  - High efficiency central plant
  - Increased duct sizes for lower specific fan powers
  - Comprehensive energy management system
  - Building management system to provide sophisticated energy efficiency controls

19.4 The strategy is to utilise air source heat pump system to all the retail units, hotel, residential reception and amenity areas to provide the entire heating and cooling demand.

19.5 The use of roof space for photovoltaic panels was dropped in favour of amenity space.

19.6 The analysis has shown that by incorporating low and zero carbon technologies in addition to the passive and low energy design measures there is a predicted reduction of annual CO<sub>2</sub> emissions from the baseline scheme as indicated in the table below:

Regulated CO <sub>2</sub> Savings	
Tonnes CO <sub>2</sub> /Year	%
99.19	10.29

19.7 The renewable energy technologies are currently predicted to achieve a 7.05% reduction in carbon emissions over the passive low energy scheme based on regulated uses.

19.8 If PV panels were considered further a 10% saving from renewable in line with the relevant policies may have been achieved.

19.9 The overall energy strategy identifies a predicted annual carbon emission saving of 99.19 tonnes per annum over the baseline scheme.

19.10 Some concerns have been raised by the Special Projects Planner, however they consider that any concerns could be addressed by condition.

## 20.0 **Safe and Accessible Environment**

20.1 Paragraph 91 of the NPPF 2018 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which:-

- Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other
- Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas

These objectives are consistent with Core Strategy Policies 8 and 12, and Local Plan Policy EN5.

20.2 The proposal includes a public open space and a pedestrian route through the site linking the station and town centre and this promotes social interaction in line with the NPPF.

20.3 The Crime Prevention and Design Advisor has advised that there is higher than average crime and social vulnerability in this location (mainly: vagrancy, street drinking, ASB, drug related crime) and originally objected to the proposal for a number of reasons:-

- The undercroft access for service vehicles and how this area would be secured
- Potential conference facilities above the undercroft/potential bar area
- Concerns about whether the pedestrian path at the North West Corner of the hotel and South West corner of west apartment block was wide enough
- The right-angled shape of the North west corner of the hotel limits surveillance
- Fundamental concerns regarding the access of emergency vehicles onto the site. Given the topography of this site, the gradient between Brunel Way and the square, may make access difficult.
- No active frontage overlooking Wellington Street/little if any natural surveillance along this pedestrian pathway
- Seating Area for retail area 1- details of management, physical measures needed to prevent vehicle incursion into this seated area, lack of surveillance from inactive frontages (now closed businesses)

20.4 In response to the comments, a number of changes have been introduced to overcome the objections to the original scheme. These include:-

- Barriers have been introduced to the service yard and car park entrance along with night time shutters
- Fencing has been introduced to the bus station boundary and around the service yard beneath the hotel to improve passive surveillance of the delivery yard
- A gate has been introduced on the eastern side of residential block (east) and access to cycle parking areas now takes place only from within the public square.

- Passive surveillance of the western access/egress to the public square has been improved through changes to hotel rooms configuration and a wider space between buildings.
  - The southern façade of the hotel is activated with a new entrance from a taxi drop lay-by
  - Changes to landscaping seek to address concerns about encouraging rough sleeping and loitering
- 20.5 The Crime Prevention and Design Advisor has withdrawn the objection subject to a condition/conditions which achieve the following:-
- Gym over overcroft to be used only for that use and no other purpose
  - External/Physical security inc laminate glass
  - Barrier must be security roller shuttered gate/electronic gate not barrer
- 20.6 Therefore the application is considered acceptable in terms of crime prevention and providing a safe and accessible environment.
- 21.0 **Ecology**
- 21.1 Paragraph 17 of the NPPF 2018 states that when determining planning applications, if significant harm to biodiversity cannot be avoided or adequately mitigated or as a last resort compensated for then planning permission should be refused. It also states that opportunities to incorporate biodiversity improvements in and around the developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 21.2A Phase 1 habitat survey has been carried out on the site.
- 21.3 No evidence of roosting bats was identified during the roost assessment and the trees on site did not support any potential roost features and as such, are classified as having negligible potential to support roosting bats. In addition, the site is isolated from any suitable foraging habitat by major roads and commercial buildings with high levels of noise and light pollution. Therefore, the site is not considered to be suitable for roosting, foraging or commuting bats.
- 21.4 All birds and their nests are protected from harm and destruction under the Wildlife and Countryside Act 1981 (as amended). The site supports vegetation in the form of dense ivy and scattered trees, which have the potential to support nesting birds. If the proposals require the removal of the vegetation to facilitate development, then clearance should be undertaken outside of the bird-nesting season (March to September inclusive for most British bird species) so to avoid potentially disturbing a nest. If the clearance works are to be undertaken from March to September than an ecologist should undertake a check for nesting birds immediately prior to any vegetation being removed.
- 21.5 A number of enhancements are proposed to provide suitable mitigation for the loss of bird nesting habitat on site which are:-
- The design should incorporate two Schwegler brick bird nest boxes and one Schwegler 1SP sparrow terrace on each building. The boxes should be sited at a minimum height of 2m, angled away from the prevailing wind

and with unobstructed access to the box entrance. These boxes will enhance the site for house sparrows, a red list species (Birds of Conservation Concern).

- Vegetation that will be beneficial to birds and pollinating invertebrates should be incorporated into the landscaping scheme. Plants could include lavender *Lavendula spp.*, barberry *Berberis darwinii* and rowan *Sorbus aucuparia*.

21.6 Subject to conditions requiring the provision of mitigation as outlined in the Phase 1 habitat survey, the proposal is considered acceptable in ecology terms.

## 22.0 **Fire Strategy**

22.1 The NPPF 2018 does not have any policies relating to fire safety; this is normally considered under Building Control rather than planning. However, a fire strategy has been prepared for the two blocks of flats and the hotel building and given concerns following the Grenfell Tower fire, this has been assessed by the councils Fire and Access Surveyor.

For the flats the following will be provided:-

- In line with the current Building Regulations each building will have one fire-fighting shaft with a fire-fighting staircase, a fire-fighting lift and a protected lobby.
- The fire-fighting lobby will be ventilated by mechanical smoke extract shaft. AOV will be provided at the head of the stair.
- The fire main will be a wet riser located within firefighting shaft in accordance with BS 9990 (building over 50m).
- All apartments will be compartmented from each other and from common parts of the building.
- All apartments will be provided with a minimum category LD1 detection and alarm system in accordance with BS 5839-6.
- Apartments with open plan kitchen / living room will have the cooking facilities located remotely from the apartment entrance and will be further assessed by CFD modelling
- The travel distance from the furthest apartment door to the stair lobby will be less than 7.5m.
- The fire escape will be provided via residential cores, with protected routes to external areas.
- Emergency lighting will be provided in each building as per BS 5266-1.
- Emergency signage will be provided in each building as per BS ISO 3864-1.
- The amenity areas with one exit will be limited to occupancy of max 60 persons.
- Automatic suppression (sprinklers) will be provided in all residential areas in accordance with BS 9251 or BS 8458.
- All loadbearing elements of construction will achieve at least 120 minutes fire resistance.
- The cladding system is proposed from brickwork with non-combustible insulation (*as per Appendix 1 Brickwork Facade of NHBC Common wall façade types*)

- External facade fire protection is likely to be required to East elevations where they are located close to the Bus Station site boundary. Required areas of protection will be confirmed at the next design stage.
- Cavity barriers will be provided to external walls around openings and along lines of compartmentation in each building.
- All services passing through lines of compartmentation will be suitably fire stopped in each building.
- Fire Service vehicular access at the ground level has tracked by the highways consultant.
- The buildings will have 24-hour management which will ensure continuous maintenance of the fire strategy.

For the hotel the following will be provided:-

- In line with the current Building Regulations the building will have one fire-fighting shaft with a fire-fighting staircase, a fire-fighting lift and a protected lobby.
- The fire main will be a dry riser located within fire-fighting shaft in accordance with BS 9990 (building up to 50m).
- The fire-fighting stair lobby will be ventilated by mechanical smoke extract shaft. AOV will be provided at the head of the stair.
- The hotel building will be provided with two cores, both with protected routes to external areas.
- The corridors will be provided with natural smoke ventilation.
- All hotel areas will be provided with a minimum category L1 detection and alarm system in accordance with BS 5839-1
- Emergency lighting will be provided as per BS 5266-1.
- Emergency signage will be provided as per BS ISO 3864-1.
- All loadbearing elements of construction in the hotel building will achieve at least 90 minutes fire resistance.
- The cladding system is proposed from non-combustible fibre cement panels with a non-combustible insulation.
- Cavity barriers will be provided to external walls around openings and along lines of compartmentation in each building.
- All services passing through lines of compartmentation will be suitably fire stopped in each building.
- Fire Service vehicular access at the ground level has tracked by the highways consultant.
- The buildings will have 24-hour management which will ensure continuous maintenance of the fire strategy.

In respect of the underground car park the following will be provided:-

- The car park comprises one upper level and a half lower level under the whole site.
- Four fire-fighting shafts will be provided on the upper full level and two at the lower half level.
- Each fire-fighting shaft will have a mechanically ventilated protected lobby, a fire-fighting staircase and a fire-fighting lift.
- The staircases will be split at ground level to separate from the upper levels.
- Mechanical smoke ventilation will be utilizing “jet fans” installation for smoke extract.

- The car park areas will be provided with a fire alarm and smoke detection to BS 5839 Category L2 level.
- There is no requirement to provide automatic fire suppression to the basement car park.

22.2 The Council's Fire and Access Surveyor has considered the fire strategy and made some comments. In response the agents provided the following information:-

- A firefighting shaft (stairs/lifts) for firefighting personnel will be provided to both blocks.
- A fire-mains will be provided, with the outlets within the protected stairway/lobby to both blocks. As the top storey height of both blocks exceeds 50m this will be a wet rising main.
- Both blocks will be fully sprinklered to BS 9251: 2005.
- The fire strategy will be based on the guidance of BS 9991 (rather than AD-B) which allows single direction travel distances of up to 15m in a ventilated corridor where sprinkler protection is provided. This limit will be adhered to.
- Smoke ventilation will be provided to the protected stairs and lobby/corridor adjacent the stair. This will be achieved using either a natural or mechanical smoke shaft.
- The final exits to the stairs will be sized at either the width of the stair or larger.

Following the receipt of extra information, the Council's Fire and Access Surveyor confirmed that the information provided was acceptable.

23.0 **Impact on amenity of neighbouring occupiers**

23.1 The site is in effect an island site; surrounded on all sides by roads and the railway. As a result the buildings on site are not close to other residential dwellings, particularly since the two taller residential blocks are located on the side of the site furthest from Bath Road and therefore at the furthest point from surrounding buildings. The proposal is not therefore considered to have any detrimental impact on neighbouring properties.

24.0 **Infrastructure requirements/Section 106**

24.1 Section 106 contributions agreed with agent are set out below.

Affordable Housing	Payment in Lieu £7.618m and terms of payment agreed with SBC housing
Education	£353,039 (primary education contribution excluded)
Highways/transport:	£350k transport contribution towards Brunel Way walking, cycling, access and public realm improvements £* implementation of traffic regulation orders (prior to commencement)(amount to be confirmed) £12,000 Travel Plan contribution (£6,000 residential

	and £6,000 hotel) prior to occupation Travel Plan (submitted prior to occupation or within 6 months of first occupation) Residents excluded from being eligible for on-street parking permits;
Air quality/Low Emission Strategy:	£190k contribution (or possibly on site provision)

Section 106 still under discussion

A number of items are still under discussion and further clarification will be provided at committee or on the update sheet

Highways/transport:	£150k transport contribution towards the electrification/infrastructure of the bus station to support electric buses.
Air Quality	The air quality contribution sought was £250k. The package was considering the following:  S106/S278 Provision and building and extending of 6 new low emission laybys around Brunel Way (map to be produced) S106/S278 Provision of signage, bay markings and associated TROs S106/S278 Provision and installation and DNO connection for Rapid EVs servicing the low emission laybys around Brunel Way S106 EV infrastructure to service: 2 EV car clubs bays - 2 dedicated EV Taxi Bays and Rapid Chargers 2 Public EV bay – replacement of existing Rapid Charger S106 EV infrastructure management and operation to be transferred to the Councils appointed operators S106 Financial contribution towards future EV bus infrastructure within the bus station of £150,000 S106 Financial contribution towards Highway Improvements in Brunel Way of £x (tbc)

(For information the highways and air quality section 106 were developed in consultation as there was likely to be an overlap between requirements)

Highways works Section 278 requirements

The following highways works which would be required as part of a Section 278 Agreement and have been agreed with the agent are as follows:-

- Temporary construction access point(s)
- Widening of Slough Borough Council owned Bus Station access road by 1m as shown on plan SBC/TFS/HT/P01
- Reconstruct the footways fronting the application site with Heart of Slough natural stone paving in keeping with the remainder of the public realm area
- Street lighting installation/modifications on the Bus Station access road

- Reinstatement of redundant access point on Brunel Way to footway construction using Heart of Slough Paving
- Installation of any street lighting modifications (as necessary)
- Refreshing and Installation of road marking modifications (as necessary)
- Drainage connections (as necessary);
- Gully cleaning (nearest gullies around the site and site access);
- Construction of drop-off point for application site (details to be agreed)
- Construction of Taxi layby extension for EV Taxis as shown on plan SBC/TFS/HT/P01 including 1no 2-way EV rapid charger
- Extension of layby on Brunel Way to provide a total of 3no EV bays for car club & charging as shown on plan SBC/TH/HT/P01 to include 2no rapid chargers
- Provide 2no EV bays for Car Club & charging on Brunel Way opposite railway station as shown on plan SBC/TFS/HT/P01 including 1no 2-way EV rapid charger.
- Bus Lane / Bus Station Access Road monitoring the enforcement of vehicular entry to the bus station.

**Recommendation:**

The proposal is considered to be consistent with guidance given in the National Planning Policy Framework 2018, Core Policies 7 and 8 of the Slough Local Development Framework, Core Strategy (2006 – 2026) Development Plan Document, December 2008, Policies H14, H15, EN1 and EN2 of the Adopted Local Plan for Slough 2004 and the Slough Local Development Framework, Residential Extensions Guidelines, Supplementary Planning Document, Adopted January 2010. The recommendation is set out at paragraph 1.1.

**PART D: LIST OF CONDITIONS AND INFORMATIVES**

**CONDITIONS:**

1. Time Limit  
The development hereby permitted shall be commenced within three years from the date of this permission.

REASON To prevent the accumulation of planning permissions, and to enable the Council to review the suitability of the development in the light of altered circumstances and to comply with the provisions of Section 91 of the Town and Country Planning Act 1990.

2. Approved Plans  
The development hereby approved shall be implemented only in accordance with the following plans and drawings hereby approved by the Local Planning Authority

List of drawings will be on the amendment sheet

REASON To ensure that the site is developed in accordance with the submitted application and to ensure that the proposed development does not prejudice the amenity of the area and to comply with the Policies in the Development Plan.

3. Details and Samples of Materials

No development shall commence until samples of external materials (including, reference to manufacturer, specification details, positioning, and colour) to be used in the construction of external envelope of the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority before the scheme is commenced on site and the development shall be carried out in accordance with the details approved.

REASON To ensure a satisfactory appearance of the development so as not to prejudice the visual amenity of the locality in accordance with Core Policy 8 of The Slough Local Development Framework, Core Strategy 2006 – 2026, Development Plan Document, December 2008, Policy EN1 of The Adopted Local Plan for Slough 2004 (saved polices), and the requirements of the National Planning Policy Framework 2018.

4. Samples of external materials to be used in the construction of the access road, pathways and communal areas within the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority before the scheme is commenced on site and the development shall be carried out in accordance with the details approved.

REASON To ensure a satisfactory appearance of the development so as not to prejudice the visual amenity of the locality in accordance with Core Policy 8 of the Slough Local Development Framework Core Strategy (2006 – 2026) Development Plan Document December 2008 and Policy EN1 of the Adopted local Plan for Slough 2004

5. Prior to first occupation of the development, a 'refuse management strategy' to be used by the management company for the transfer of waste/recycling bins to collection points and the collection of bins shall be submitted to and approved in writing by the Local Planning Authority. The 'refuse management strategy' shall include the annotation of the separate general waste and recyclable bin stores. The waste/recycling storage facilities shall be provided in accordance with the approved drawings and shall be retained at all times in the future for this purpose, and the strategy shall be complied with for the duration of the development.

REASON In the interests of visual amenity of the site and in the interests of highway safety and convenience in accordance with Policy EN1 of The Adopted Local Plan for Slough 2004.

6. The development shall not be occupied until the cycle stores have been provided in accordance with approved plan XXX. The cycle store shall be retained thereafter for cycle storage at all times unless otherwise agreed in writing by the Local Planning Authority.

REASON To ensure that there is adequate cycle parking available at the site in accordance with Policy T8 of The Adopted Local Plan for Slough 2004, and to meet the objectives of the Slough Integrated Transport Strategy.

7. No development shall begin until details of a scheme (Working Method Statement) to control the environmental effects of construction work has been submitted to and approved in writing by the Local Planning Authority.  
The scheme shall include:
- (i) control of noise
  - (ii) control of dust, smell and other effluvia
  - (iii) control of surface water run off
  - (iv) site security arrangements including hoardings
  - (v) proposed method of piling for foundations
  - (vi) construction working hours, hours during the construction phase, when delivery vehicles taking materials are allowed to enter or leave the site
  - (vii) the route of construction traffic to the development
  - (viii) the use of vehicles site operatives', visitors' and construction vehicles loading (to a minimum Euro 6/VI Standard), off-loading, parking and turning within the site and wheel cleaning facilities during the construction period and machinery to comply with the emission standards in Table 10 in the Low Emission Strategy guidance.
  - (ix) Considerate construction certification
  - (x) Phasing / Timings plan
- The development shall then be carried out in accordance with the approved scheme for the duration of the construction works or as may otherwise be agreed in writing by the Local Planning Authority.

REASON In the interests of the amenities of the area in accordance with Core Policy 8 of The Slough Local Development Framework, Core Strategy 2006 – 2026, Development Plan Document, December 2008, and the National Planning Policy Framework.

8. The surface water control measures shall be carried out in accordance with the following details:-
- Campbell Reith Flood Risk Assessment 12584 F1
  - Campbell Reith Surface Water Management Plan 12584 F1
  - Campbell Reith Email dated 30<sup>th</sup> August 2018

The surface water control measures shall be retained thereafter and the drainage system shall be managed and maintained for the lifetime of the development in accordance with details that have first been submitted to and approved in writing by the Local Planning Authority.

REASON To ensure that surface water discharge from the site is satisfactory and shall not prejudice the existing sewerage systems in accordance with Policy 8 of the adopted Core Strategy 2006 - 2026.

9. 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.

10. No piling shall take place until a piling method statement (detailing the depth and 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 on 0800 009 3921 to discuss the details of the piling method statement.

11. 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.

12. Development shall not commence until details have been submitted to and approved by the Local Planning Authority in consultation with Thames Water, of how the developer intends to ensure the water abstraction source is not detrimentally affected by the proposed development both during and after its construction. More detailed information can be obtained from Thames Water's Groundwater Resources Team by email at [GroundwaterResources@Thameswater.co.uk](mailto:GroundwaterResources@Thameswater.co.uk) or by telephone on 0203 577 3603.

Reason - To ensure that the water resource is not detrimentally affected by the development.

13. Development shall not commence until further information on foundation design has been submitted to the Local Planning Authority in consultation with Thames Water, for detailed consideration. This will include:-
  - a. the methods to be used
  - b. the depths of the various structures involved
  - c. the density of piling if used and
  - d. details of materials to be removed or imported to site.

More detailed information can be obtained from Thames Water's Groundwater Resources Team by email at [GroundwaterResources@Thameswater.co.uk](mailto:GroundwaterResources@Thameswater.co.uk) or by telephone on 0203 577 3603.

Reason - to better assess the risk to water resources from the construction of the foundations.

14. Development shall not commence until a detailed foul water drainage strategy has been submitted to and approved by the Local Planning Authority in consultation with Thames Water. Details of any proposed connection points or alterations to the public system, including calculated discharge rates (pre and post development) must be included in the drainage strategy.

Reason: In order for Thames Water to determine whether the existing sewer network has sufficient spare capacity to receive the increased flows from the proposed development, a drainage strategy must be submitted detailing the foul and surface water strategies.

15. 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.

16. The developer shall carry out a watching brief during site work and shall draw to the attention of the Local Planning Authority to the presence of any unsuspected contamination (to soil or/and water, determined by either visual or olfactory indicators) encountered during the development. In the event of contamination to land and/or water being encountered, no development or part thereof shall continue until a programme of investigation and/or remedial work to include details of the remedial scheme and methods of monitoring, and validation of such work undertaken has been submitted to and approved in writing by the Local Planning Authority.

None of the development shall be commissioned and/or occupied until the approved remedial works, monitoring and validation of the works have been carried out and a full validation report has been submitted to and approved in writing by the Local Planning Authority.

In the event that no significant contamination is encountered, the developer shall provide a written statement to the Local Planning Authority confirming that this was the case, and only after written approval by the Local Planning Authority shall the development be commissioned and/or occupied.

Reason: To ensure that any ground and water contamination is identified and adequately assessed, and that remediation works are adequately carried out, to safeguard the environment and to ensure that the development is suitable for the proposed use.

17. Prior to the plant, machinery and equipment hereby approved first being brought into use, a BS4142 (2014) Noise Assessment shall be submitted to the

Local Planning Authority for approval in writing. The noise rating level emanating from the proposed plant and equipment shall not exceed 0dB above the existing prevailing background levels that exist in the absence of the development and calculated 1m from the nearest residential boundary. Once approved, the plant and equipment shall be operated in accordance with the approved Noise Assessment.

REASON To protect the residential amenities of the area and prevent nuisance arising from noise and to accord with Core Policy 8 of The Slough Local Development Framework, Core Strategy 2006 – 2026, Development Plan

18. No part of the development hereby permitted shall be occupied until details of the measures to be incorporated into the development to demonstrate how 'Secured by Design Gold Award' accreditation will be achieved has been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and shall not be occupied or used until written confirmation of Secured by Design accreditation has been submitted to the Local Planning Authority. The approved security measures shall be retained thereafter.

REASON In order to minimise opportunities for crime and anti-social behavior in accordance with Policy EN5 of The Adopted Local Plan for Slough 2004 and Core Policies 8 and 12 of the adopted Core Strategy 2006-2026

19. Construction Traffic Management Plan

No part of the development shall commence until a Construction Traffic Management Plan has been submitted to and agreed in writing by the Local Planning Authority. The Plan shall include details of:

- (i) Construction access;
- (ii) Vehicle parking for site operatives and visitors;
- (iii) Loading/off-loading and turning areas;
- (iv) Site compound;
- (v) Storage of materials;
- (vi) Precautions to prevent the deposit of mud and debris on the adjacent highway.

The development hereby permitted shall thereafter be carried out in accordance with the approved Construction Management Plan.

REASON To minimise danger and inconvenience to highway users

(Any additional conditions will be on the update sheet)

**INFORMATIVE(S):**

1. The applicant is reminded that an Agreement under Section 106 of the Town and Country Planning Act 1990 has been entered into with regards to the application hereby approved.
2. In dealing with this application, the Local Planning Authority has worked with the applicant in a positive and proactive manner through pre-application

discussions. It is the view of the Local Planning Authority that the proposed development does improve the economic, social and environmental conditions of the area for the reasons given in this notice and it is in accordance with the National Planning Policy Framework.

3. All works and ancillary operations during both demolition and construction phases which are audible at the site boundary shall be carried out only between the hours of 08:00hours and 18:00hours on Mondays to Fridays and between the hours of 08:00hours and 13:00 hours on Saturdays and at no time on Sundays and Bank Holidays.
4. Noisy works outside of these hours only to be carried with the prior written agreement of the Local Authority. Any emergency deviation from these conditions shall be notified to the Local Authority without delay.
5. During the demolition phase, suitable dust suppression measures must be taken in order to minimise the formation & spread of dust.
6. All waste to be removed from site and disposed of lawfully at a licensed waste disposal facility.
7. 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 groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.
8. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).
9. 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.
10. 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.

11. There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.