ARLA DAIRY SITE, VICTORIA ROAD, SOUTH RUISLIP

PLANNING REPORT

ON BEHALF OF ALBEMARLE DEVELOPMENTS LTD & ARLA FOODS UK PROPERTY COMPANY LIMITED

May 2013

Our Ref: **JLN0132**

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DOCUMENT 1

Letter from London Borough of Hillingdon regarding Screening Opinion

DOCUMENT 2

GLA Letter

1 INTRODUCTION

1.1 This report has been prepared on behalf of Albemarle Developments Ltd and Arla Foods UK Property Company Limited ('the applicant') in support of a detailed planning application which proposes the comprehensive mixed use redevelopment of the Arla Dairy site in South Ruislip ('the application site').

1.2 The purpose of this planning report is to provide the factual background including a description of the application site and surrounding area, details of the application proposals and an assessment of the relevant planning policies against which the application proposals are to be determined, drawing upon the conclusions reached by other documents prepared in support of the application.

1.3 The application proposals comprise a comprehensive mixed use scheme of redevelopment including:

- Asda foodstore including ancillary customer cafe (8,539sqm gross, 4,554sqm sales area)(Use Class A1) and petrol filling station
- Cineworld 11 screen multiplex cinema (5,937sqm gross)(Use Class D2)
- 5 family themed restaurants (total 2,405sqm gross)(Use Class A3)
- 4 unit shops (total 382sqm gross)(Use Class A1 and/or A2)
- 104 dwellings including affordable units

1.4 In addition, the proposals provide a number of associated works. These can be summarised as:

- Demolition of existing dairy related structures
- The provision of a new pedestrian access from Long Drive (the 'Long Drive Link') providing an attractive and legible pedestrian route through the site linking South Ruislip local centre to the proposed foodstore, cinema and restaurant uses ('Dairy Avenue')
- Detailed scheme of hard and soft landscaping including the development of a landscaped seating area outside the proposed cinema and restaurant units (the 'piazza') and the formation of a new public square ('Arla Square') at the pedestrian entrance to the site from Long Drive around which the proposed 4 unit shops will be located
- The creation of a new main vehicular and pedestrian access into the site from Victoria Road to be shared between the Arla site and the adjacent retail warehouses (the 'Aviva' site).
- The stopping up of the existing Aviva access road and the reconfiguration of the car park layout to the retail warehouses
- Provision of 564 car parking spaces (part under-croft) for use by customers of the proposed foodstore, cinema and restaurant uses"

1.5 The application site in the main comprises the Arla Dairy. Since 2005 the site has remained vacant despite active marketing. The site currently provides no economic benefit to the local area. The application proposals represent a major opportunity to ensure the comprehensive redevelopment of the site and provide significant economic and regeneration benefits for the local area. In addition to the dairy the red line boundary of the application proposals also includes the car parking to the adjacent retail warehouses which facilitate a revised access arrangement.

1.6 This report is one of a number of reports which have been prepared to support the planning application. This planning report should therefore be read in conjunction with the following reports.

- Design and Access Statement prepared by DLA Architecture
- Retail and Leisure Report prepared by RPS Planning and Development Ltd
- Transport Assessment prepared by Redwood Partnership
- Travel Plan (Asda, residential and other uses) prepared by Redwood Partnership
- Landscape Strategy and Planting Scheme prepared by MacGregor Smith
- Noise Assessment prepared by Sharps Redmore
- Sustainability Assessment prepared by Halcrow
- Energy Strategy prepared by Wallace Whittle
- Lighting Assessment prepared by Wallace Whittle
- Sunlight and Daylight Assessment prepared by GL Hearn
- Statement of Community Engagement prepared by Beattie Communications
- Waste Management Plan prepared by Academy
- Construction Management Strategy prepared by Stace
- Demolition Strategy prepared by Stace
- Flood Risk Assessment and Drainage Strategy prepared by Ward Cole
- Air Quality Assessment prepared by RPS
- Preliminary Risk Assessment (Ground Conditions Report) prepared by WSP
- Employment Land Report prepared by Grant Mills Wood
- Arboricultural Report prepared by CROWN Consultants
- Preliminary Ecological Appraisal prepared by The Ecology Consultancy
- Archaeological/Heritage Desktop Assessment prepare by Mills Whipp Projects
- Utilities/Services Report prepared by Wallace Whittle
- BREEAM and Code for Sustainable Homes Pre-Assessments prepared by Wallace Whittle
- Ventilation & Air Exhaust/Discharge Strategy prepared by Wallace Whittle
- CHP Stack Emissions Report prepared by Wallace Whittle

1.7 The application proposals will provide a number of important benefits. These can be summarised as follows:

- The scheme will result in a significant number of permanent local employment opportunities (650 jobs), including full and part time jobs associated with the construction and operation of the foodstore, cinema and restaurants in addition to supporting small business start ups through the provision of local unit shops. These would be a wide range of jobs available and suitable for local people
- The economic benefits that will be revived from the scheme are consistent with the Government's drive to stimulate the economy through sustainable economic growth including job creation
- Comprehensive regeneration of a brown field site adjacent to an existing local centre in a sustainable location
- The establishment of a high quality, attractive and distinctive mixed use development which will provide a number of enhancements to the local area
- The application proposals will increase local competition and choice and help to promote more sustainable main food shopping trips
- The proposed mix retail and leisure uses will reduce the need for local people to travel

- The proposed scheme will help promote the vitality and viability of South Ruislip reinforcing its existing role and function and increasing customer choice
- Improvements to the evening economy through the proposed cinema and restaurants uses. These will complement the existing leisure offer of the local centre. The enhanced leisure offer will assist in the reduction of both the number and the length of motorised journeys
- Retention of locally generated retail and leisure expenditure to the local area will benefit the existing local centre
- The proposed foodstore will compete with the existing Sainsbury's store which is reported as significantly over trading. South Ruislip is already a main food and comparison goods shopping destination
- The proposal represents an opportunity to improve the main vehicular access into the site by providing a shared facility with the neighbouring retail warehouse units. In turn this will assist the re-occupation of the existing retail warehouses to the benefit of local residents both in terms of choice and range of local retail facilities and local employment opportunities
- Integration of the site with South Ruislip local centre through the direct provision of a combined pedestrian and cycle link from Long Drive providing an attractive and legible pedestrian route through the site to the proposed cinema, foodstore and restaurants – a distance of less than 250m
- Local retail units help foster business start ups
- Proposed off site highway improvements will assist queuing and ease of pedestrian movement at the junction of Victoria Road and Long Drive
- The provision of a highly sustainable and energy efficient development
- New public spaces will be created with a Piazza in front of the leisure units and the creation of a public square around which it is proposed to provide four local unit shops. In addition on site play space is provided for the occupiers of the new residential units at a mid point within the site
- The application proposals will provide 104 high quality new residential units which will contribute to the identified need for new housing within the Borough including accommodation suitable for families
- 36.5% (38) of the units will be affordable

1.8 This application has been prepared in knowledge of the recent planning consent (24 April 2013) which granted a replacement Sainsbury's store at South Ruislip (LPA ref: 33667/APP/2012/3214), and the various application documents have taken on board consideration of any cumulative effects.

1.9 The remainder of the report is organised into the following sections:

- Section 2: Factual Background
- Section 3: The Proposals
- Section 4: Planning Policy
- Section 5: Planning Considerations
- Section 6: Conclusions

2 FACTURAL BACKGROUND

a) Site and Surrounding Area

2.1 The application site is located behind existing residential and commercial premises fronting Victoria Road and Long Drive within South Ruislip, approximately 10 km to the east of junction 16 of the M25 London Orbital within a predominantly residential and commercial area. The site also lies in close proximity to both the A40 and M4 (1km and 6km to the south respectively).

2.2 Views into the site from the surrounding road network are restricted. Indeed, the site has no direct frontage to either Victoria Road or Long Drive.

2.3 The application site extends to 5.56 hectares and largely comprises the Arla Diary which includes a range of buildings and other structures which have been vacant since the dairy closed in 2005. The application site currently comprises four main buildings (including engineering stores and workshops, dairy processing area, silo and staff facilities including canteen), two factories, an office block and a multi-storey car park. These buildings are surrounded by large expanses of hardstanding, as well as a number of above ground storage tanks. There are currently limited activities on the site, most of which relate to as site security.

2.4 The application site also includes the area of existing car parking associated with the former Focus DIY and Land of Leather retail warehouse units fronting Victoria Road.

2.5 Vehicular access to the site is gained form two existing points of access leading from Victoria Road, one of which is shared with the service access to the retail warehouse units.

2.6 The application site is a short walk (135m) from South Ruislip Station (rail and underground services) which is located on Long Drive. The site is also served by 114 bus with bus stops located on Victoria Road. The application site has a Public Transport Accessibility Level (PTAL) rating of 3.

2.7 The application site is bounded to the north east by existing residential properties, a parade of shops (with residential above) fronting Victoria Road and the Middlesex Arms public house fronting Long Drive to the south east. The shops form part of the designated South Ruislip local centre. Chilton line railway and Crown cash and carry bounds the application site to the south-west, with the Braintree Road business park and vacant retail warehouse units to the north-west.

2.8 The local centre also includes Sainsbury's foodstore, a Ramada Hotel and South Ruislip Library and Adult Learning Centre. Beyond the library is Queensmead School playing fields as well as Queensmead Sports Centre.

2.9 There is also a BP connect petrol filling station and four unit shops located opposite the retail warehouse units to Victoria Road. In the wider area there are a number of retail parks which including occupiers such as Homebase, Argos and Brantano.

2.10 Part of the site adjacent to the railway is subject to the HS2 safeguarding route. The site also lies under the flight path of RAF Northolt.

b) Planning History

2.11 The site has an extensive planning history associated with the site's use as a dairy. The more recent planning history for the dairy, included planning permission for the siting of portakabins, erection of a building for additional research facilities, installation of milk storage silos, construction of a new tanker unloading bay and an extension to the cold store.

2.12 The application site also includes the car parking associated with the 'Aviva' retail warehouse units. Outline planning permission (LPA ref: 3953DS/93/1523) was granted on 16 May 1996 for the erection of 3716sqm of non food retailing warehousing and an external garden centre (929sqm) including servicing, car parking, landscaping and access. Siting and access were approved as part of the outline consent, with design, external appearance and landscaping forming part of the reserved matters approval.

2.13 The range of goods permitted to be sold from the retail warehouse units was subsequently varied to allow the sale of domestic electrical goods, gas appliances and office equipment (LPA ref: 3953EG/96/1602). An appeal to further extend the good range to allow the sale of pets and pet products was dismissed in December 1997.

c) Site Designation

2.14 The statutory development plan covering the site comprises the Hillingdon Unitary Development Plan (UDP) (saved non-superseded policies), Hillingdon Local Plan: Part 1 Strategic Policies (2012) together with the London Plan (2011).

i. Hillingdon UDP

2.15 The Hillingdon UDP was originally adopted in 1998. In September 2007 selective policies were 'saved' by a Direction issued by the Secretary of State pending the replacement of the UDP by the Local Development Framework (LDF). Since then a number of the policies have been superseded by the Hillingdon Local Plan: Part 1 - Strategic Policies (2012).

2.16 The site continues to be allocated on the Proposals Map to the adopted Hillingdon UDP as forming part of a defined 'Industrial and Business Area' (Policy BE25) and lies immediately adjacent to the identified boundary of the 'South Ruislip local centre' and the 'Core Shopping Area'. South Ruislip is a defined local centre. In retail policy terms the application site represents an edge of centre location being entirely within 300 metres of the core shopping area (in the case of leisure within 300 metres of the local centre boundary) of South Ruislip.

2.17 Policy BE25 states:

> **"The local planning authority will seek to ensure modernisation and improvement of industrial and business areas through careful attention to the design and landscaping of buildings and external spaces. Where appropriate it will seek improved vehicular and pedestrian access and circulation"**

2.18 Furthermore policy LE2 is applicable and seeks to control the release of sites within Industrial and Business Areas for non B Class uses. The policy states:

> **"Industrial and business areas are designated for business, industrial and warehousing purposes (use classes B1-B8) and for**

sui generis uses appropriate in an industrial area. The local planning authority will not permit development for other uses in industrial and business areas unless it is satisfied that:-

i) there is no realistic prospect of the land being used for industrial or warehousing purposes in the future; and
ii) the proposed alternative use does not conflict with the policies and objectives of the plan.
iii) the proposal better meets the plan's objectives particularly in relation to affordable housing and economic regeneration."

ii. Draft Consultation Site Allocation DPD

2.19 The Council have previously consulted upon a draft Site Allocations DPD 2006 which included a specific policy (policy SA3) relating to the application site. The draft policy acknowledged that dairy operations on the site were due to cease in 2006 and that the site presented a redevelopment opportunity with benefits for the local centre. The draft Site Allocations DPD promotes the site for mixed use development including residential, commercial and retail uses. The draft allocation does not include the Aviva site. The policy states:

"Land at the former South Ruislip dairy site amounting to 5,84ha is allocated for mixed use development comprising of residential, commercial and retail units, a public square and a community facility provided that:

i) residential development is at a density not exceeding 50 u/ha providing that there is no change in public transport accessibility levels;
ii) Provision of 35% affordable housing
iii) That the development seeks to conserve energy materials, water and other resources, promote sustainable waste management and that designs make the most of natural systems both within and around the building."

2.20 The reason for the proposed reallocation of the site is stated as to provide an opportunity to develop South Ruislip local centre and to meet housing need. Furthermore, the supporting justification (paragraph 7.1.40) states that:

"The objective of this site's redevelopment is to provide a high quality and sustainable residential design on unutilised land. This policy will have regard to the surrounding area and comply with the Hillingdon Design and Accessibility Statement, Affordable Housing SPD and Hillingdon's Community safety by Design SPG. Where other designations exist on the allocated sites, the generic policies form the Core Strategy will apply. The Council will seek proposals to contribute to sustainable development and will expect developers to alleviate any impacts from new development and where appropriate to contribute towards meeting the costs of infrastructure, facilities and other improvements required as a direct result of development."

2.21 The proposed scheme of redevelopment accords with the draft policy. The proposed re-allocation of the site was made in direct response to representations made by Arla Foods UK. Even so, at that time it is clear that the Council considered a mixed use development as being appropriate. Furthermore as the following paragraphs explain the Council is proposing to release the site for non-B Class uses in the recently adopted Local Plan: Part 1.

iii. Hillingdon Local Plan: Part 1 Strategic Policies (Adopted November 2012)

2.22 In October 2011 the Council submitted the Hillingdon Core Strategy to the Secretary of State. Following the publication of the Inspector's report in July 2012, the Council adopted the Core Strategy as the Local Plan: Part 1 Strategic Policies in November 2012.

2.23 Map 5.1 of the Local Plan: Part 1 shows the board location for employment growth. The dairy site is shown as forming part of a local significant industrial site (LSIS) (notwithstanding that the Employment Land Study 2009 proposed the exclusion of the dairy from the LSIS) but where the managed release of employment land is proposed.

2.24 In line with the conclusions of Hillingdon's Employment Land Study (2009) and Hillingdon's Position Statement on Employment Land and Retail Capacity (2010), the adopted Local Plan: Part 1 lists a number of locations for the managed release of industrial and warehousing land. Paragraph 5.12 identifies the application site 'part of Braintree Road area, South Ruislip' as one of the locations considered to be most suitable for the managed release of employment land. Indeed this is consistent with the NPPF which encourages LPA's to de-designate employment land where there is no realistic prospect of it coming forward (paragraph 22) and the London Plan.

2.25 The boundary of the designated Air Quality Management Area (AQMA) is illustrated on Map 8.5 of the Local Plan: Part 1. The application site is located adjacent to the designated AQMA.

d) Pre-application Engagement

i. London Borough of Hillingdon

2.26 The applicant has attended a number of meetings with relevant officers at Hillingdon Council to discuss proposals for the site over the past 12 months.

2.27 During pre application discussions the proposed scheme was 'screened' and Local Planning Authority concluded that 'the site is not considered to be particularly sensitive to development and any environmental impacts area unlikely to be significant, complex or widespread. In these and all other respects, the development cannot be said to trigger the thresholds which would indicate that EIA is necessary'. A copy of the letter from the local authority is attached at Document 1.

Document 1

2.28 The application proposals take into account and respond to the comments raised by officers. In particular the design of the scheme has evolved considerably and this is duly described in the submitted design and access statement.

ii. Greater London Authority (GLA)

2.29 A pre-application meeting was held with the GLA on 1 October 2012. Following the meeting the GLA issued its written assessment dated 15 October 2012. A copy of the GLA letter is attached at Document 2. The GLA letter concludes *'that whilst the principle of mixed use development is acceptable on site and the inclusion of community facilities is welcome, the quantity of proposed*

retail and leisure floorspace is not compliant with the London Plan'. The GLA response goes on to state that a comprehensive retail impact assessment in compliance with London Plan policy will be required. A comprehensive Retail and Leisure Report has been prepared by RPS to support the application proposals.

Document 2

2.30 The GLA letter also commented in relation to the proposed residential development that 'the provision of residential accommodation on the site together with community facilities is supported in principle, subject to providing an appropriate mix of units types, tenure types and quality of design'.

2.31 The GLA response provided comments on the proposed design and layout of the scheme, indicating that the GLA had concerns that the *'proposed typology would create poor quality pedestrian environment that is not appropriate for this location nor would successfully integrate the new centre with the existing centre'*. The GLA response goes on to indicate that *'consideration needs to be given to wrapping all car parking, servicing and blank frontages with more active uses as illustrated in the diagram below'*. The sketch diagram within the GLA letter seeks to focus all the town centre uses to the east of the site, with the car parking and servicing to the west. The letter acknowledges residential uses are proposed and whilst the idea of mix use development is welcomed in principle, the GLA suggests that consideration should also be given to locating residential only buildings to the west of the site.

2.32 Since the GIA meeting the proposals for the site have evolved significantly. Importantly, the car parking serving the proposed commercial development is now screened and provided in the form of predominantly under croft car parking. The cinema has also been located adjacent to the foodstore, fronting the Piazza.

2.33 Section 5 of this report considers in detail the proposed layout and design of the proposed scheme and Design and Access Statement considers how the scheme has evolved.

iii. HS2

2.34 Land adjacent to the railway owned by Arla Food UK is subject to the HS2 safeguarding route. The applicant has been liaising directly with HS2 to ensure the application proposals are compliant with HS2. Following these discussions the red line application boundary and the proposed scheme have been amended to avoid any conflict with the proposed HS2 works.

iv. RAF Northolt

2.35 The site lies under the flight path to RAF Northolt. The applicant has been in discussions with the Defence Infrastructure organisation regarding RAF Northolt to discuss building heights. and the proposed scheme takes on board the outcome of those discussions. The applicant and their architects are continuing to liaise with RAF Northolt to ensure the proposed development has no effect on the operation of the airport.

v. South Ruislip Residents Association

2.36 The applicant has kept the South Ruislip Residents Associations informed about their proposals for the site and indeed has presented to members of the South Ruislip Residents Association on three occasions in January 2011, April 2012 and April 2013. These meetings have generally

coincided with the public exhibitions, allowing members to see how the scheme has evolved and to ask questions and provide feedback prior to a consultation taking place with the wider community.

vi. Transport for London

2.37 Discussions have been conducted with Transport for London regarding accessibility and the highway network.

vii.Public Consultation

2.38 The applicants have engaged with both local residents and businesses in the South Ruislip area. Three public exhibitions have taken place in November 2010, April 2012 and April 2013, as well as leaflet drops and posters within local businesses to advertise the public consultation and to provide details of the consultation web site. The consultation engagement process has taken account of the comments raised by local residents and stakeholders where possible.

2.39 The application is supported by a Statement of Community Involvement which provides details of the public consultation undertaken. The Statement of Community Involvement seeks to demonstrate that the public consultation undertaken for the proposed scheme has sought to reach as many people as possible within the local area, as well as local interest groups.

2.40 The feedback from these exhibitions has been supportive of the proposals.

3 THE PROPOSALS

3.1 This section of the report describes the proposed scheme of development. The table below summaries the proposed floorspace which comprises the scheme:

Use	Proposed Floorspace / Units (GEA)
Asda Foodstore including ancillary cafe and petrol filling station.	8,539sqm (GEA) (4,554sqm sales area)
Cineworld 11 screen multiplex cinema	5,937sqm (GEA) (1760 seats)
5 family themed restaurants	2,405sqm (GEA)
4 unit shops	382sqm (GEA)
Residential units	104 units

a) Asda Foodstore and Petrol Filling Station

3.2 The proposed foodstore will comprise 8,539sqm (GEA) floorspace. The net sales area of the store will be 4,554sqm. The store and petrol filling station will be operated by ASDA providing local residents with a choice of operators furthermore the proposal store will assist in relieving congestion at the existing Sainsbury's South Ruislip store.

3.3 The foodstore will sell a range of convenience and comparison goods similar to other large foodstore e.g. Sainsburys, South Ruislip. The Asda store will additionally include an integral ancillary customer café (214sqm).

3.4 The proposed Asda store will operate an internet/home delivery service from the store delivering products directly to customers homes.

3.5 The petrol filling station will be fully automated with an attendant monitoring the use of the station. Payments will only be taken via card. There will be no petrol filling station shop. Petrol filling stations have become common place with foodstores and this will assist in providing competitive fuel pricing in the local area. The proposed petrol filling station will be located in the north-west corner of the site.

3.6 The foodstore will create 160 full time and 300 part times jobs.

3.7 Asda are currently under-represented in both Hillingdon and this part of north-west London generally. The nearest existing Asda store is located at South Harrow (an out of centre store), however this is a small store (601sqm net) and was previously operated by Netto area. This store is therefore is unable to sell a full range of convenience goods and has a very limited comparison goods offer. It therefore is unable to compete with the existing Sainsbury's South Ruislip store.

3.8 Planning consent was granted on appeal for a new Asda store (out-of-centre location) at Hayes (APP/R5510/A/12/2174884) on 15th November 2012. That store will comprise 7,998sqm gross floorspace (i.e. comparable to the size of store proposed for South Ruislip) and will serve the

south of the Borough, in contrast to the application proposals which will serve the north of the Borough. The Asda Hayes store is not yet operational.

3.9 At present the nearest large full range Asda stores to South Ruislip are situated at Wembley and Park Royal, 12km and 12.7km respectively from the application site. At present, local residents who express a preference to shop at Asda currently have to travel significant distances outside the borough to visit a full range store such as the one planned for South Ruislip.

3.10 The proposed foodstore will sit on stilts above the customer car park shared with the cinema and restaurants. At ground floor level there will be an entrance lobby with travelators allowing customers to access the store from either the piazza or from the customer car park.

3.11 The application drawings and the Design and Access Statement provide further details of the proposed design.

b) Cinema

3.12 The proposed cinema comprises 5,937sqm (GEA) floorspace and includes 11 separate screens ranging in size from 320 to 57 seats. Smaller auditorium have become the norm in multiplex cinemas and provide the operator with flexible space that maximise revenues. The cinema will be operated by Cineworld. Full details regarding Cineworlds operation is set out in the RPS Retail and Leisure report.

3.13 The cinema is proposed to be located to the west of the site adjacent to the proposed foodstore. The entrance to the cinema fronts the proposed piazza. Like the foodstore, the ground floor comprises the entrance lobby which incorporates escalators taking customers up to the foyer area and auditoriums on the first floor.

3.14 The nearest existing Cineworld cinemas to South Ruislip are located at Staples Corner and Feltham.

3.15 The cinema will employ 5 full time staff and 56 part time staff.

c) Restaurants

3.16 The scheme incorporates 5 family themed restaurants. The proposed restaurants and the cinema create an attractive leisure offer with mutual benefits for all operators. It is important that both the restaurants and the cinema are co-located with the proposed foodstore. This unique formula ensures the viability and deliverability of the leisure components of the scheme which would otherwise not be financially viable given the high cost of fitting out the cinema.

3.17 Five restaurants are proposed totalling a floorspace of 2,405sqm (GEA). Two of restaurants will be located under the cinema between the entrance lobby to the cinema and the foodstore. The other three restaurants are proposed to be located directly opposite the piazza. These restaurants are single storey with internal bin stores, to minimise any noise in view of their location adjacent to the existing residential properties.

3.18 The restaurants are expected to provide 115 to 147 covers, with additional potential for outdoor dining. These will incorporate outdoor seating adding interest and activity to this part of the site. The restaurants are expected to be operated by national chains including Frankie & Bennys,

Chiquitos, Nandos and Pizza Express, therefore extending the range of eateries available to local residents.

3.19 The restaurants will create 75 full time and 50 part time jobs.

d) Unit Shops

3.20 Four local unit shops totally 382 sqm (GEA) are proposed in the south east corner of the application site adjacent to existing local centre. It is proposed that these unit shops will be for Class A1 and/or A2 purposes i.e. the units will provide some flexibility in attracting suitable tenants. Demand for these types of units has been expressed to the applicant. Indeed this is evidenced by the lack of available shop premises within South Ruislip to attract new business to the local centre.

3.21 The proposed unit shops on the Arla site will complement that planned provision and existing shops and service uses found within South Ruislip.

3.22 The local shop units will each comprise the following floorspace:

- Unit 1: 150sqm
- Unit 2: 62sqm
- Unit 3: 88sqm
- Unit 4: 80sqm

3.23 The size of the proposed local unit shops are comparable in size to existing units found within South Ruislip local centre. It is envisaged that the local unit shops will create 4 full time positions and 4 part time positions.

e) Residential

3.24 104 residential units are proposed comprising a combination of flats and houses of which 36.5% will be affordable units (split between 60% social rent and 40% intermediate). All units provided will comply with the Lifetime Homes standard and 10% of all units are wheelchair accessible. The table below details the proposed range and type of dwellings proposed.

	1b2p (flat)	2b3p (flat)	2b4p (flat)	3b5p (House)	4b6p (House)	4b7p (House)	Total	%
Private	11	5	39	8		3	66	63.5
Affordable Units – Social Rent	6		13	3	1		23	36.5
Affordable Units - Intermediate	4		10	1			15	
Total	21	5	62	12	1	3	104	100

3.25 The residential units are proposed to the south-east of the site, located between the foodstore and Long Drive, as well as along part of the north east boundary of the site, next to the existing

residential properties which front Victoria Road. The residential scheme comprises eight blocks of accommodation and the schedule of accommodation which accompanies the scheme drawings provides details of the proposed units for each block.

3.26 The residential units are planned along the new pedestrian link in a simple form and rhythm which reflects the site context. The eight residential blocks incorporate a unified palette of materials to provide a consistent character and reinforce the regularity and rhythm of the overall design approach.

3.27 The residential layout incorporates the provision of a new public square (Arla Square) around which it is proposed to locate the four unit shops. Residential units are to be provided over these shops.

3.28 The proposed layout enables all residential units to have private amenity space in the form of gardens, with the flats having balconies and shared communal amenity space. Cycle stores are provided each block.

3.29 On site play provision is provided in the form of a designated play space located off the Avenue and a door step play area forms part of Arla square, both of which are in close proximity to the residential units.

3.30 The Design and Access Statement prepared by DLA Architecture provides further details of the proposed residential development.

f) Access and Car Parking and Public Realm

3.31 The application proposals include the formation of a new main vehicular access into the site shared with the neighbouring retail warehouses. This will serve the proposed commercial leisure and retail uses including the petrol filling station and the adjacent retail warehouse units. A revised car park layout for the retail warehouses is also proposed, which arises from the need to 'stop up' the existing vehicular access to the car park. A direct benefit of this is that it brings the car park up to standard through provision of additional disabled spaces although there will be no increase in the number of car parking spaces provided. Furthermore the rationalised access arrangement will improve traffic flows on Victoria Road and ease of crossing for pedestrians.

3.32 Vehicular access to the proposed dwellings will be from the existing access arrangement (main existing entrance to the dairy) from Victoria Road close to the junction with Victoria Road/Long Drive. This will provide a separate dedicated access for residents. There is no through vehicular access to the commercial areas of the scheme.

3.33 Significantly, the proposals include the creation of a central pedestrian access through the site (Dairy Avenue) with a link to Long Drive, therefore linking the local centre with the proposed foodstore, cinema and restaurants. At either end new public spaces will be created including a public square (Arla Square) and a piazza complete with water feature, sculpture and seating areas.

3.34 The application proposals seek consent for two options to create the new pedestrian link from Long Drive and these areas are shown on the submitted landscape drawings (Option A and B).. Only one of these options will be progressed.

3.35 Shared car parking will be provided for the cinema, restaurants and foodstore in the form of part under croft/part surface level parking. The car park will comprise 564 spaces. Blue badge and parent and child spaces and a pick-up/drop-off point are proposed adjacent to the entrance lobby to the foodstore. Cycle parking, motorcycle spaces are provided as well as electric car charging points.

3.36 The residential development will have separate car parking provision comprising of 126 car parking spaces.

3.37 Further information on the proposed access and parking arrangements is provided within the Design and Access Statement and the Transport Assessment submitted in support of the planning application.

g) Servicing Arrangement

3.38 Service vehicles will enter the site via the new vehicle access arrangement from Victoria Road. A shared service road is proposed to run around the perimeter of the site to service the proposed foodstore, cinema and restaurant uses.

3.39 The service area to the foodstore is provided at first floor level by means of a ramp to the rear of the store adjacent to the railway embankment. Service lay-by's will be provided to service the cinema and restaurants.

3.40 The small local unit shops will be serviced by the residential access.

h) Landlord Facilities

3.41 A small management suite will be provided to the rear of restaurant units 4 and 5, and will include office and shower facilities.

i) Landscaping

3.42 A Landscape Strategy has been prepared by MacGregor Smith. The landscape strategy focuses on creating attractive private gardens and communal areas for the residential development, as well as attractive and legible public spaces throughout the proposed scheme.

3.43 The key element of the proposed landscape strategy is the new pedestrian access linking Long Drive (Dairy Avenue), to the foodstore, cinema and restaurants to the local centre. This ensures that the proposed development is fully integrated with the existing local centre and South Ruislip station. The landscape strategy illustrates the two possible options for the new pedestrian link and demonstrates how the link will fully integrate with the local centre and will create an inviting and attractive environment for pedestrians.

3.44 The new public spaces created at either end of the new pedestrian link, will also create attractive landscaped areas. The landscaped piazza in front of the cinema and restaurants will create a welcoming space with the opportunity for outdoor dining and informal recreation. The public square (Arla Square) also provides a focal point around which the local unit shops are to be located, with seating and soft and hard landscaping features including door step play elements.

3.45 The Landscape Strategy also explores the opportunities for art work within the new development. Artwork and sculptural elements which reflect the history of the site as a dairy are incorporated within the scheme.

3.46 The Design and Access Statement and Landscape Strategy provide further details of the proposed areas of hard and soft landscaping, the new pedestrian link, piazza, new public square and the play spaces.

j) Phasing of Development

3.47 It is anticipated that the proposed development will be delivered in 3 phases. Phase 1 will involve the demolition of the existing buildings and formation of a new vehicular access to the site. Phase 2 will comprise the commercial retail and leisure uses (excluding unit shops) together with the creation of a new pedestrian access into the site from Long Drive. Phase 3 will comprise the residential development including unit shops. Phase 3 is expected to be delivered by a house builder/social landlord.

3.48 Accordingly it is important that sufficient flexibility is provided within the conditions/Section 106 agreement to allow the development to be progressed in a phased manner or to allow phases of development to be bought forward separately or simultaneously.

4 PLANNING POLICY

a) Introduction

4.1 This section of the report examines relevant national, regional and local planning policy. Application proposals should be determined in accordance with the development plan unless other material considerations indicate otherwise.

4.2 The relevant statutory development plan comprises the 'saved' non-superseded policies of the Hillingdon UDP (September 2007) together with the Hillingdon Local Plan: Part 1 Strategic Policies (November 2012) and the London Plan (July 2011).

b) National Planning Policy Framework (NPPF)

4.3 On the 27th March 2012, the Government published the National Planning Policy Framework (NPPF). The NPPF builds upon the Ministerial Statements on *Planning for Growth* (March 2011) and Positive Planning (June 2011) which supporting economic growth and the recognises the key role planning has to play in ensuring that the sustainable development needed to support economic growth is able to proceed as quickly as possible.

4.4 The NPPF combines the government's economic, environmental and social planning policies and sets out the Government's planning policies for England and how these are expected to be applied. The NPPF revokes previous planning policy issued in the form of planning policy statements and guidance including PPS4 (*Planning for Sustainable Economic Growth*).

4.5 The NPPF does not change the statutory status of the development plan as the starting point for decision making on planning applications. It states that proposed development that accords with an up to date local plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

4.6 However, the 12 month period from the publication of the NPPF whereby decision-takers may continue to give full weight to relevant policies adopted since 2004, even if there is a limited degree of conflict with the framework, has now expired.

4.7 Paragraph 6 of the NPPF states that *'the purpose of the planning system is to contribute to the achievement of sustainable development'*. Paragraph 7 goes on to set out that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

> **"- an economic role – contributing to building a strong, responsive and competitive economy**
>
> - **an social role – supporting social vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations and by creating a high quality built environment**
> - **an environmental role – contributing to protecting and enhancing our natural, built and historic environment"**

4.8 Importantly, paragraph 8 goes on to states:

"Therefore, to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions"

i. Presumption in Favour of Sustainable Development

4.9 Paragraph 14 explains that at the heart of the NPPF is a presumption on favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking.

4.10 For decision-taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  - specific policies in this Framework indicate development should be restricted.

ii. Delivering Sustainable Development

4.11 The NPPF structures itself around 13 guiding principles which will help deliver the primary aim of sustainable development. Of particular relevance to this application are:

Building a Strong, Competitive Economy

4.12 The NPPF seeks to build a strong and competitive economy, outlining the Government's commitment to securing economic growth in order to create jobs and prosperity. Paragraph 19 states that:

"…significant weight should be placed on the need to support economic growth through the planning system"

4.13 Paragraph 20 goes on to highlight the importance of supporting development which establishes an economy fit for the 21st century.

4.14 Paragraph 22 sets out that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose:

"Where there is no reasonable prospect of a site being used for the allocated employment use, applications alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities"

Ensuring the Vitality of Town Centres

4.15 Paragraphs 23-27 deal with retail and leisure matters, stating that planning polices should be positive and promote competitive town centre environments. In particular paragraph 23 states that Local Planning Authorities should, inter alia:

- Pursue policies to support town centre viability and vitality

- Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
- Allocate suitable sites to meet the scale and type of retail needs. The NPPF states that it is important that the needs for retail and other main town centre uses are met in full;
- Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre
- Recognise that residential development can play an important role in ensuring the vitality of centres, and encourage residential development in appropriate sites.

4.16 In relation to town centre uses (such as leisure and retail uses including cinemas and restaurants), where these are proposed outside defined town centres and do not accord with the provisions of the development plan, proposals need to be assessed in terms of the sequential test and impact.

Promoting Sustainable Transport

4.17 Sustainable transport is a key driver of sustainable development engrained within the NPPF. The NPPF states that *'the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel'* (paragraph 29).

4.18 Paragraph 30 goes on to explain that *'encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce the need to travel. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport'.*

Delivering a Wide Choice of High Quality Homes

4.19 All planning applications for housing should be considered in the context of the presumption in favour of sustainable development. The NPPF seeks to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities (paragraph 50).

4.20 Local Planning Authorities should ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing. In order to meet the requirements of paragraph 50, Local Planning Authorities should:

- Plan for a mix of housing
- Reflect local demands through the size, type, tenure and range of housing required; and
- Set policies to meet affordable housing needs on site, unless off-site provision or financial contributions can be robustly justified.

Requiring Good Design

4.21 The NPPF states that the Government attaches great importance to the design of the built environment, and paragraph 57 explains that is it important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

Conserving and Enhancing the Natural Environment

4.22 Importantly at paragraph 111 the NPPF specifically encourages the development of previously developed land:

> **"Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of a high environmental value"**

4.23 The NPPF encourages local planning authorities to approach decision making in a positive way in order to foster the delivery of sustainable development. It states that local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

c) <u>The London Plan – Spatial Development Strategy for Greater London (July 2011)</u>

4.24 The London Plan provides a range of policies relevant to the consideration of the application proposals. The following comprises a summary of the key policies:

i. London's People – Housing

4.25 A key aim of the London Plan is to deliver more homes for Londoners which meet a range of needs and are of a high quality design. Policy 3.3 explains there is a need for more homes in London to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price that they can afford.

4.26 Policy 3.3 seeks to address this issue, requiring Boroughs to achieve and exceed the minimum annual average housing target. For Hillingdon the 'minimum' ten year target is 4,250 new homes for the period 2011-2021, equating to 425 per annum. Policy 3.3 continues by stating that Boroughs should 'realise brownfield housing capacity' through, amongst other things, town centre renewal, intensification and mixed use development.

4.27 The London Plan recognises that housing density should take account of local context and character, design principles and public transport capacity. In order to optimise housing potential, Policy 3.4 requires development to accord with the broad density range outlined in Table 3.2. This table suggests a recommended density range for suburban housing development with a PTAL rating of 3 of 150-250 hr/ha.

4.28 Policy 3.5 recognises that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. Table 3.3 of the London Plan which accompanies Policy 3.5 sets out minimum space standards for the size of new dwellings which includes:

Dwelling Type	GIA (sqm)
1b2p (Flat)	50
2b4p (Flat)	70
2b3p (Flat)	61
3b5p (House)	96
4b6p (House)	107

Source: London Plan (2011) Table 3.3

4.29 Policy 3.6 relates to Children and Young People's Play and Informal Recreation Facilities which recognises that all children and young people should have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision incorporating trees and greenery wherever possible. It goes onto state that development proposals should make provision for play and informal recreation based on the expected child population generated by the scheme. This is discussed further below in the Mayor's SPG on Shaping Neighbourhoods; Play and Informal Recreation SPG, September 2012.

4.30 Policy 3.8 relates to Housing Choice and states that boroughs should work with the Mayor and local communities to identify the range of needs likely to arise in their areas and to ensure, amongst other things the following:

- that new developments offer a range of housing choices, in terms of the mix of housing sizes and types and taking account of the housing requirements of different groups and the changing roles of different sectors including the private rented sector.
- provision of affordable family housing is addressed as a strategic priority in LDF policies.
- All new housing is built to 'Lifetime Homes' standards.
- 10% of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

4.31 Policy 3.9 recognises that communities mixed and balanced by tenure and household income should be promoted. Policy 3.11 goes on to state that of the affordable housing provision provided on site 60% should be for social rent and 40% for intermediate rent or sale.

4.32 Policy 3.12 recognises that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes and regard should be had to:

- Current and future requirements for affordable housing at local and regional levels.
- To be in accordance with policy 3.11.
- To encourage rather than restrain residential development.
- To promote mixed and balanced communities.
- The size and type of affordable housing needed in particular locations.
- The specific circumstances of individual sites.

ii. London's Economy

4.33 In relation to employment land, policy 4.4 of the London Plan identifies Hillingdon as a 'limited' transfer borough. The Plan states that redevelopment of surplus industrial land should address strategic and local objectives particularly for housing and for social infrastructure and community activities. In edge of centre locations, surplus industrial land could be released to support wider town centre objectives (paragraph 4.23).

4.34 The London Plan includes a range of policies (Policy 4.7 and 4.8) which seek to support the role and function of town centres. New retail and leisure development outside town centres are required to be assessed in both sequential and impact terms. Policy 4.7 additionally includes a test of 'scale'. In this respect, the policy is now out of date having regard to the policy tests prescribed for testing new retail and leisure developments in the NPPF.

4.35 The Retail and Leisure Report prepared by RPS which accompanies the application considers these matters in detail.

iii. London's Response to Climate Change

4.36 Achieving sustainable development is a key aim of the London Plan. The Mayor seeks to achieve significant reductions in overall CO2 missions in London, with Policy 5.2 setting out the following targets:

Building Type	Target			
Residential	2010-2013	2013-2016	2016-2031	
	25%	40%	Zero Carbon	
Non-domestic	2010-2013	2013-2016	2016-2019	2019-2031
	25%	40%	As per building regulations requirements.	Zero Carbon

Source: London Plan (2011) Policy 5.2

4.37 The preference is that carbon dioxide reduction targets should be met on site.

4.38 Policy 5.3 relates to sustainable design and construction where the Mayor requires the highest standards to be achieved to improve the environmental performance of new developments and to adapt to the effects of climate change. It requires development proposals to demonstrate that sustainable design standards are integral to the proposal, including its construction and operation and that the minimum standards outlined in the Mayor's supplementary planning guidance Sustainable Design and Construction (2006) are met. Full details on how the proposed development complies with these standards are set out in the Sustainability Statement and Energy Statement submitted in support of the application proposals.

4.39 The Mayor expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025 (Policy 5.5). The policy seeks to prioritise connection to existing or planned decentralised energy networks where feasible. Connecting to

existing heating or cooling networks is the preferred option in the energy systems hierarchy as set out in Policy 5.6.

4.40 Policy 5.7 relates to renewable energy and states that within the framework of the energy hierarchy (Policy 5.2), major development proposals should provide a reduction in the expected carbon dioxide emissions through the use of on-site renewable energy generation where feasible. The London Plan presumes that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation, where feasible.

4.41 Major developments proposals should also reduce overheating and reliance on air conditioning systems in accordance with the requirements of Policy 5.9.

4.42 Policy 5.10 and 5.11, which govern urban greening, state that green infrastructure should be integrated in major development proposals to include room, wall and site planting, and green roofs and walls where feasible. In addition, Policy 5.13 seeks the use of Sustainable Urban Drainage Systems (SUDS) where possible.

iv. London's Transport

4.43 Through the London Plan, the Major seeks closer integration of transport and development. Policy 6.1 addresses this by, inter alia, encouraging patterns of development that reduce the need to travel, especially by car, and supporting developments that generate high levels of trips at locations with high public transport accessibility.

4.44 Policy 6.3 states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed and that development should not adversely affect safety on the transport network. Transport Assessments will be required for major planning applications in addition to delivery and servicing plans.

4.45 Policy 6.9 concerns cycling and states that developments should provide secure, integrated and accessible cycle parking facilities in accordance with minimum standards. For residential development Table 6.3 of the London Plan states that 1 space per 1 or 2 bed unit or 2 spaces per 3 or more bed unit should be provided. Policy 6.10 requires that development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space.

4.46 Policy 6.13 concerns parking and the need for development proposals to accord with the maximum parking standards set out in Table 6.2 of the London Plan.

4.47 The note to this table states that all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit. In addition to the above, the policy states that 1 in 5 spaces must provide an electrical charging point to encourage uptake and provide at least one accessible on or off street car parking bay designated for blue badge holders if no general parking is provided or at least two spaces where off street parking is provided.

v. London's Living Places and Spaces

4.48 Policy 7.1 requires developments to be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure, local shops, employment opportunities, commercial services and public transport.

It further requires that development should maximise the opportunity for community diversity, inclusion and cohesion and should contribute to a people's sense of place, safety and security.

4.49 Policy 7.2 states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and that he supports the principles of inclusive design which seek to ensure that developments can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstance. It requires design and access statements submitted with development proposals to explain how the principles of inclusive design have been integrated into the proposed development. Policy 7.3 requires that development should reduce the opportunities for criminal behaviour and contribute to a sense of security.

4.50 Policy 7.4 relates to local character and in particular, the need for buildings, streets and open spaces to provide a high quality design. Policies 7.5 and 7.6 require developments to address the public realm and incorporate the highest quality architectural design, landscaping and materials, planting, street furniture and surfaces.

4.51 Policies 7.14 and 7.15 relate to air and noise pollution. Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs).

vi. The London Plan: Revised Early Minor Alterations

4.52 The Mayor published revised early minor alterations to the London Plan in June 2012. These are aimed at ensuring that the London Plan is fully consistent with the NPPF. The revised Early Minor Alterations also incorporate the early minor alternations issued for consultation in February 2012. Both sets of alterations were considered together by an independent Inspector at an examination in public in November 2012.

4.53 With regards to affordable housing the document seeks to amend London Plan Policies 3.8 and 3.13 to reflect the new definition given for affordable housing (new affordable rent product). Policy 3.11 sets out a new approach to setting affordable housing targets in LDF. Alterations are also proposed to Policy 3.12 to set out a clear sequential hierarchy of preferred options to securing affordable housing through the planning system with onsite provision given preference with off-site next and cash payments last.

4.54 Chapter 6 has been altered to update cycle parking standards following the outcome of the review carried out by Transport for London. The change in Policy 4C3 use is one space per one or two bedroom dwelling for residents plus one per 40 units for visitors. Two spaces, per three plus bedroom dwellings for residents plus one space per 40 units for visitors.

d) <u>GLA Supplementary Planning Guidance (SPG) supporting the adopted London Plan (2011)</u>

4.55 The Mayor has produced a range of supporting Supplementary Planning Guidance which provides further detail on particular policies or subjects within the London Plan.

i. Housing (2012)

4.56 This document provides guidance to supplement housing policies in the London Plan 2011. In particular, it provides detail on how to carry forward the Mayor's view that providing good homes for Londoner's is not just about numbers. The quality and design of homes and the facilities provided for those living in them, are vital to ensuring good liveable neighbourhoods.

4.57 Standard 4.10 (baseline requirement) of the SPG states that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings.

4.58 Baseline 4.10.2 states that all private outdoor space should have level access from the home, and baseline standard 4.10.3 states the minimum depth and width for all balconies and other private external spaces should be 1500mm.

4.59 Paragraph 2.3.27 explains that dwellings on upper floors should all have access to a terrace, roof garden, winter garden, courtyard garden or balcony. Houses and ground floor flats should preferably have private gardens.

ii. Sustainable Design and Construction (2006)

4.60 The Sustainable Design and Construction SPG provide more detailed guidance for Local Planning Authorities on how to implement the London Plan policies. It explains the principles of sustainable design and construction and how they should be implemented in London. It gives architects, developers, designers and other professionals ideas where to find good technical advice and guidance on achieving development, that can contribute to the Mayors vision of London as an exemplary sustainable world city.

iii. The London Plan: Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation (2012)

4.61 This SPG replaces the Mayor's 2008 SPG on Child Play Space and relates to the implementation of London Plan Policy 3.6 providing more detailed guidance to support the London Plan policy.

4.62 The SPG sets out that residential development should seek to provide some form of children's play space, preferably on-site, for all age groups. If play space cannot be provided on site it needs to be justified in policy terms. This SPG has been developed to give developers guidance in defining the children's open space they need to provide on site as part of any new residential or mixed-use development. The SPG guidance recommends a provision of 10sqm per child within the development. Under 5's children's play space must be provided on-site as a minimum (within 100m). Play space for older children (5-10 and 11-15 age groups) that cannot be provided on-site must be located in very close proximity to the subject site (400m-800m), albeit the exact requirement is dependent upon the likely child yield from the development.

e) Hillingdon Unitary Development Plan

4.63 There are a number of policies within the UDP which have been ‘saved’ and which have not been superseded by the Hillingdon Local Plan which remain relevant to the consideration of the application proposals. These policies are summarised below.

i. Design

4.64 Policy BE13 requires the layout and appearance of development to harmonise with the existing street scene and features of an area. The design should take account of the need to ensure that windows overlook pedestrian spaces to enhance pedestrian safety (policy BE18). In addition, Saved Policy OE1 prohibits proposals that are to the detriment of the character and appearance of the surrounding properties or area.

4.65 Policy BE19 requires that proposals complement or improve the amenity and character of the area. Policy BE20 states that residential layout should facilitate adequate daylight and sunlight penetration into and between units. Should any buildings result in a significant loss of residential amenity by means of their siting, bulk and proximity, planning permission will be refused (Policy BE21).

4.66 Where buildings exceed two storeys in height, Policy BE22 requires that they are set back a minimum of 1m from the site boundary. The design of all new buildings should also protect the privacy of its occupiers (Policy BE24).

4.67 The UDP considers external amenity space as an important element of residential proposals. Accordingly, Policy BE23 requires external amenity space to be provided and to be sufficient to protect the amenity of the occupants. Similarly, Policy R1 requires proposals to provide accessible amenity, recreation and play space appropriate to the scale of development. Policy R16 states that proposals for shops, business use, services, community and other facilities open to the public should include adequate provision for accessibility in particular those of elderly people, people with disabilities, woman and children.

ii. Housing

4.68 Chapter 7 of the UDP concerns housing and acknowledges that population trends indicate a continuing demand for new housing in the Borough.

4.69 Paragraph 7.10 explains that it is desirable that the size and distribution of the housing stock should more closely match the present and future distributions of households. Paragraph 7.10 goes on to explain that *'as there is a shortage of smaller dwellings in the Borough the Local Planning Authority will normally therefore apply policy H4 which is intended to diversify the housing stock and widen choice for those living or wishing to live in the Borough'*. Paragraph 7.11 goes on to highlight that the council acknowledges the importance of residential accommodation in town centres as part of an overall mix of uses.

4.70 Policy H4 of the UDP requires:

> **"Wherever practicable a mix of housing units of different sizes should be provided in schemes of residential development including in particular units of one or two bedrooms. Within town centres predominantly one and two bedroom development will be preferable".**

4.71 Paragraph 7.11 explains the Council will also have regard to the range and type of units most urgently required to meet existing and anticipated housing need in different parts of the borough.

4.72 Policy H5 states:

> **"The Council will encourage dwellings suitable for large families, where the needs of the area suggest it is appropriate, by:-**
>
> **i) encouraging the improvement or extension of single family dwellings for this purpose where this would comply with environmental standards set out in this plan;**
> **ii) providing for this type of dwelling in the Council's own programme of development and acquisition and encouraging housing associations to do the same; and**
> **iii) negotiating the provision of larger dwellings by the private sector in new development, bearing in mind the need to ensure such housing meets local needs".**

iii. Transport and Accessibility

4.73 Policy AM1 states that development drawing from a catchment greater than a walking distance will only be permitted providing:

> **"i) It is or can be made accessible by public transport from the areas from which it is likely to draw the majority of its employees, potential customers and visitors, and**
> **ii) The existing or proposed public transport system has sufficient capacity to absorb the additional journeys generated by people travelling to the completed development".**

4.74 Policy AM2 requires all proposals for development to be assessed against traffic generation and their impact on congestion. Policy AM7 states that the impact of a proposal on the capacity and function of existing and committed principle roads will be considered by the Local Planning Authority in assessing applications.

4.75 Notwithstanding saved policies AM1 and AM2, paragraph 14.7 of the UDP states:

> **"Even where there is a lack of capacity of the road and public transport systems there may be cases where other, wider interests are put forward to justify major development proposals"**

4.76 Policy AM13 states that the LPA will seek to ensure that proposals increase easy access and spontaneity of movement for elderly people, the frail and people with disabilities.

4.77 Policy AM14 and Annex 1 of the UDP sets out the council's parking standards for new development. Annex 1 sets out a table of the standards and notes that the London Plan standards are to be used unless a specific London Borough of Hillingdon standard is listed in the Annex and this should then be applied.

4.78 Policy AM15 requires the provision of conveniently located disability spaces in car parks. The Accessible Hillingdon SPD (2010) sets out the disabled parking standards for the Borough.

iv. Other Relevant Policies

4.79 Policy OE3 states that development proposals must mitigate any noise impact to acceptable levels. Any noise sensitive developments, such as family housing, will not be permitted by Policy OE5 to be located in area which may be subject to unacceptable levels of noise.

4.80 Policy OE8 requires any development resulting in additional surface water run-off to include appropriate attenuation measures.

4.81 New landscaping and planting should be provided within new development proposals wherever it is appropriate in accordance with Policy BE38.

f) Hillingdon Local Plan: Part 1 – Strategic Policies

4.82 The Hillingdon Local Plan: Part 1 – Strategic Policies was adopted in November 2012. The document sets out the long term vision and objectives for the Borough, and includes broad policies for steering and shaping development.

4.83 The document sets out a 'Vision for Hillingdon 2026' which includes 'improved accessibility to local jobs, housing and facilities to improve the quality of life of residents'.

4.84 The document goes on to set out a number of strategic objectives to deliver the vision. These objectives include:

- **"SO7 – Address housing needs in Hillingdon using appropriate planning measures**
- **SO15 - protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses.**
- **SO16 – manage appropriate growth, viability and regeneration of town and neighbourhood centres.**
- **SO18 – Improve access to local services and facilities, including health, education, employment and training, local shopping, community, cultural, sport and leisure facilities".**

4.85 Paragraph 5.3 states that Hillingdon has 358 hectares of designated employment land which is focused on the industrial areas of the Hayes - West Drayton Corridor, Uxbridge, Heathrow and South Ruislip.

4.86 Paragraph 5.10 recognises there is more employment land than currently needed, and goes on to explain that any release of surplus industrial land will be carefully managed to support Hillingdon's employment generation whilst creating opportunities for regeneration and release to other uses including much needed housing. Paragraph 5.10 goes on to confirm the London Plan requires Hillingdon to adopt a 'Limited Transfer' approach to the transfer of industrial sites to other uses.

4.87 The Local Plan at paragraph 5.11 explains that based on a survey of existing industrial land in the Borough undertaken as part of the production of the Employment Land Study (July 2009) and updated by Hillingdon's Position Statement on Employment Land and Retail Capacity (2010), reveals that there is 17.58 hectares of surplus industrial and warehousing land which could be released over the period 2011-2026. Paragraph 5.11 goes on to state that this is equivalent to 4.9% of the total current designated employment land in the borough and 1.5% of Strategic Industrial Locations.

4.88 Map 5.1 of the Local Plan shows the broad locations for employment growth within the borough. The map shows existing and proposed employment land designations but also illustrates potential areas for managed release of employment land. The application site comprises one such location.

4.89 Policy E1 concerns managing the supply of employment land and states:

> **"The Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63 hectares of new employment land.**
> **Areas for managed release of employment land are shown on Map 5.1"**

4.90 Policy E5 of the Hillingdon Local Plan concerns Town and Local centres and states the Council will accommodate additional retail growth in established centres, in accordance with the conclusions of the latest evidence base. The policy goes on to state the Council will improve town and neighbourhood centres across Hillingdon as set out in Map 5.3, and improve public transport, walking and cycling connections to town and neighbourhood centres. South Ruislip is identified as a local centre.

4.91 Policy H1 concerns housing growth within the Borough and states:

> **"The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.**
> **The Borough's current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021.**
> **Rolled forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of the Hillingdon Local Plan: Part 1 – Strategic Policies. Sites that will contribute to the achievement of this target will be identified in the Hillingdon Local Plan: part 2 – Site Specific Allocations Local Development Document (LDD)"**

4.92 The supporting text at paragraph 6.15 explains that the London Plan (2011) sets an annual monitoring target for Hillingdon to provide 425 new homes per annum, and in accordance with Government advice, this target has been rolled forward over the period of the Hillingdon Local Plan: Part 1.

4.93 Paragraph 6.23 concerns design and density of residential development and sets out that *'high quality design for new homes will continue to be a priority for the Council and the type of dwellings provided should reflect housing needs identified in the Borough, particularly the need to provide more family homes with adequate garden space'*. Paragraph goes on to explain *'the density of residential development should take account of the need to optimise the potential of sites compatible with local and historic context, which respecting the quality, character and amenity of surrounding uses'*.

4.94 Paragraph 6.25 states that the supply of affordable housing is a key priority for the Borough. Policy H2 states:

> **"Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: part 1 – Strategic Policies. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects**

housing needs in the borough, particularly the need for larger family units".

4.95 The Council has prepared an Economic Viability Assessment (EVA) to inform its Borough wide affordable housing targets. The supporting text at paragraph 6.29 states that *'subject to viability and if appropriate, the EVA indicates that 35% of all new units in the borough should be delivered as affordable housing, with an indicative tenure mix of 70% housing for social rent and 30% intermediate housing'*.

4.96 Policy BE1 is a general policy concerning the built environment. The key requirements are as follows:

- Achieve a high quality of design in buildings and the public realm,
- Be designed to include 'Lifetime Homes' principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility,
- In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards
- Improve areas of poor environmental quality;

4.97 Policy EM1 seeks to ensure new development maximises opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air pollutants. The Council requires all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Paragraph 7.11 of the Local Plan: part 1 states *'the Council will encourage all new build residential development to meet Code level 4'*.

4.98 Through the design of proposals, sufficient children's play space is required by Policy EM5 in accordance with national and local guidance. Policy EM7 concerns biodiversity and geological conservation and states that Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to the provision of biodiversity improvements from all development, where feasible, and the provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.

4.99 Policy EM8 seeks to safeguard water quality, air quality, noise and land contamination as a result of development proposals. In relation to air quality Policy EM8 states that *'all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors'*.

4.100 The Council will steer development to the most appropriate locations to reduce their impact on the transport network. Policy T1 requires all development to *'encourage access by sustainable modes and include good cycling and walking provision'*.

g) <u>Hillingdon's Supplementary Planning Documents</u>

4.101 Hillingdon Council have produced a range of Supplementary Planning Documents relevant to the consideration of new development. In brief these include:

Hillingdon Design and Accessibility Statement SPD – New Residential Layouts (2006)

4.102 The Hillingdon Design and Accessibility Statement sets out design guidance for new residential development.

4.103 Paragraph 4.14 of the SPD concerns garden space for houses and states *'Developments should incorporate usable, attractively laid out and private garden space conveniently located in relation to the property or properties it serves'*.

4.104 Paragraph 4.15 sets out that in considering whether adequate garden space has been provided for new houses, the Council will apply the following guidelines for amenity space for dwelling houses:

- 1 bed house a minimum of 40sqm
- 2 & 3 bedroom house a minimum of 60sqm
- 4 bedroom house a minimum of 100sqm
- 5 + bedroom house a minimum of 100sqm

4.105 Paragraph 4.17 concerns garden space for flats and in considering whether adequate garden space has been provided for new flats including the conversion of houses, the Council will apply the following guidelines for shared amenity space for flats and maisonettes:

- Studio and 1 bedroom flat - 20sqm per flat
- 2 bed bedroom flat - 25sqm per flat
- 3+ bedroom flat - 30sqm per flat

4.106 Paragraph 4.18 goes on to explain that balconies should be provided wherever possible for upper floor flats, along with private patio or garden areas for ground floor units. Where useable balconies or private garden space have been provided for individual units, the floorspace can be deducted from the calculation of outdoor amenity space.

Planning obligations SPD (2008)

4.107 The Planning Obligations SPD was prepared by the Council to outline and clarify the Council's current approach to policies and procedures in respect of planning obligations. The document is intended to provide developers, the community and the Council with a fair, transparent and predictable bass for negotiating planning obligations.

Affordable Housing SPD (2006)

4.108 The SPD provides advice on the implementation of affordable housing policies in Hillingdon by helping the interpretation and application of affordable housing guidance within the housing policies.

Accessible Hillingdon SPD (2010)

4.109 Accessible Hillingdon is supplementary to Hillingdon UDP saved policies R16 (Accessibility for elderly people, people with disabilities, woman and children) and AM13 (Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes). The SPD illustrates various design principles and design standards to ensure that development is fully accessible to all users.

4.110 The SPD offers practical and technical best practice guidance to enable planning applicants, developers, architects, urban designers, and other professionals to adopt a tangible approach to inclusive design.

4.111 Having reviewed the planning policy background the next section of this report explores the compliance of the application proposals against these policies.

5 PLANNING CONSIDERATIONS

5.1 This section considers the extent to which the proposed development accords with the relevant Development Plan policies and the National Planning Policy Framework (NPPF).

a) <u>Principle of Development</u>

i. Loss of Employment Land

5.2 As set out in Section 2 the application site is allocated on the Proposals Map to the adopted Hillingdon UDP as forming part of a defined 'Industrial and Business Area' (Policy BE25). Policy LE2 permits non Class B uses on Industrial and Business Areas proposals can meet the exception criteria; namely

i. There is no realistic prospect of the land being used for industrial and warehousing purposes in the future

ii. The proposed alternative use does not conflict with the policies and objectives of the plan

iii. The proposals better meets the plan's objectives particularly in relation to affordable housing and economic regeneration

5.3 The following considers each of the criteria in turn:

i. There is no realistic prospect of the land being used for industrial and warehousing purposes in the future

5.4 The NPPF acknowledges at paragraph 22 that *'planning polices should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of sites being used for that purpose'*. The framework highlights that land allocations should be regularly reviews and goes on to state at paragraph 22 that:

> **"where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land and buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities"**

5.5 The application site has been vacant for a number of years and was last used as an operational dairy in 2005.

5.6 Site owners Arla Foods UK have actively marketed the site for B class re-use and/or redevelopment since 2004/5. Agents were instructed to market the site and the accompanying Employment Land Report prepared by Grant Mills Woods provides a complete history of the marketing campaign for the site. It is significant that this period of marketing covered both boom and bust periods of the economy.

5.7 Despite all the marketing efforts, no interest was expressed by any potential occupiers for either the re-use of the existing buildings or for the redevelopment of the site for B Class uses. The existing buildings on site are either specialist facilities or poorly suited to current modern business needs and their adaption is not economically viable.

5.8 The application is accompanied by an Employment Land Report which advises on the demand generally within the London Borough of Hillingdon for employment premises. The Employment Land Report explains that due to the decline in the manufacturing industry in the UK and the consequent increase in the import of manufactured goods, the majority of industrial units are now used as distribution warehouses requiring direct access to motorway connections. As a result, the majority of demand in this area tends to be focused on locations around Heathrow and the M4 motorway as well as Park Royal on the A40.

5.9 The Employment Land Report concludes that there is a sufficient supply of existing properties and industrial designated development sites for potential occupiers and this is likely to remain the case for the foreseeable future. The majority of the space available is classified as being modern or refurbished. Consequently the application proposals would not have any detrimental impact on the supply of employment land in Hillingdon either immediately or in the longer term.

5.10 In terms of viability, the Employment Land Report explains that South Ruislip is considered to be a secondary industrial location largely serving local and small to medium sized companies. The report goes on to explain that it is considered that the existing accommodation on the South Ruislip and Braintree Industrial Estate will continue to satisfy existing and future demand, and there is little appetite to provide additional industrial premises, for example on the application site.

5.11 A viability appraisal for the redevelopment of the site for an industrial/warehouse development has also been conducted within the Employment Land Report. The option of redeveloping the site as an industrial/warehouse development is clearly demonstrates as being not viable.

5.12 In view of the lengthy marketing, over supply of existing floorspace within the Borough, the lack of demand for B Class uses, as well as the viability issues, it is reasonable to conclude that there is no realistic prospects of the application site being used for industrial and warehousing in the future. Furthermore the alternative use of the site would not jeopardise the councils employment land strategy for the Borough. In contrast, the application proposals represent the only viable scheme of redevelopment for the site that has arisen over the past 8 years.

5.13 Grant Mills Woods conclusions are consistent with the evidence base prepared for the Hillingdon Local Plan i.e. the Hillingdon Employment Land Study 2009 and the Position Statement on Employment Land and Retail Capacity 2010.

5.14 The Council's 2010 position statement identified an estimated total release capacity of 17.58 ha of designated employment land through the plan period based on the decline in demand for industrial and warehousing land. This is carried through into the adopted Hillingdon Local Plan which specifically recognises the application site as an area of land that can be released from employment use.

5.15 For example, Map 5.1 Local Plan shows the broad locations for employment growth within the borough. The Map also shows where the managed release of employment land is proposed. The application site is shown as forming part of a Local Significant Industrial Site (LSIS) but where the managed release of employment land is proposed.

5.16 Paragraph 5.10 of the local plan goes explains that *'any release of surplus industrial land will be carefully managed to support Hillingdon's employment generation whilst creating opportunities for regeneration and release to other uses including much need housing'*.

5.17 Paragraph 5.12 of the adopted Local Plan: Part 1 lists locations considered to be most suitable for the managed release of industrial and warehousing land. This list includes the application site 'Part of Braintree Road area, South Ruislip'. Paragraph 5.12 states that 'these sites will form a starting point for a more detailed review of such land, to be undertaken as part of the production of the Hillingdon Local Plan: Part 2 - Site Specific Allocations' Local Development Document (LDD)'.

5.18 Furthermore, this oversupply is echoed by the Mayor's SPG Land for Industry and Transport which indicates that 26 hectares of land might be available in Hillingdon for release over the period 2011 to 2031. The SPG confirms that Hillingdon is defined in the London Plan as a 'limited transfer' borough where a careful and managed release of surplus employment land is required. Indeed the Local Plan recognises that edge of centre sites such as the application site are preferable for release especially where mixed use development is proposed that can have economic benefits for local centres and the local economy in Greenwich.

5.19 The Local Plan recognises that there may be more or less than 17.58 hectares of industrial and warehousing land identified for release in the Site Specific Allocations DPD. This reflects comments made by the Inspector considering representations to the Local Plan: Part 1.

5.20 In relation to the release of employment land the Inspector stated that 'the quantum of land that could be released is an emerging one (paragraph 25). Furthermore, the Inspector went on to conclude that *'the list of possible sites to be released is only a starting point for more detailed work that will be done to inform the site allocations part of the local plan. In view of the likelihood that the quantum of employment land to be released is likely to change over the plan period, I consider that the list of sites is only a useful starting point for further assessment'*.

5.21 Similarly, issues relating to employment land were also subject of consideration in recent Asda appeal decision at Millington Road, Hays (November 2012)(APP/R5510/A/12/2174884). The Inspector's decision acknowledges at paragraph 27 that the appellants evidence showed arithmetical errors in the background calculation which led to the local authority's 17.58ha figure (employment land proposed to be released), and these errors meant that the amount of employment land which could potentially be released had been underestimated by some 13ha, such that the figure should actually be just over 30ha. This is explained by Grant Mills Wood in their Employment Land Study.

5.22 It is clear from the above assessment that after a lengthy marketing campaign there is no realistic prospect of the application site being redeveloped for an industrial/warehousing proposes. Furthermore there is a substantial oversupply of land and premises available within the Borough for Class B purposes, indicating that some of this land can be released for non-class B uses. Indeed, the Development Plan actively supports the release of the application site. Consequently there can be no harm arising from the application proposals in terms of the supply of employment land. Furthermore, the Council's draft Preferred Options Site Allocation Document specifically allocates the (Policy SA3) for the mix of uses proposed.

5.23 In view of the above it is considered that the proposals meet criterion i) and that there is no realistic prospect of the land being used for industrial and warehousing purposes in the future.

ii. The proposed alternative use does not conflict with the policies and objectives of the plan

5.24 As outlined above the application site has been identified by the local authority as a site which is suitable for the managed release of employment land, providing a strong signal that the site should be released for non B class uses. Indeed, the site is identified within the Council's Employment Land Study (2009) as providing an opportunity to develop South Ruislip local centre through an appropriate mixed use scheme.

5.25 The release and the proposed redevelopment of the site for a mixed use scheme is also consistent with the draft Site Allocations DPD (2006). Draft Policy SA3 allocates the site for mixed use development including retail, residential and commercial uses. The draft policy acknowledged that the dairy operations were due to cease in 2006 and that the site represented a redevelopment opportunity with benefits for the local centre. This allocation was in response to representations submitted by Arla highlighting the redevelopment potential of the dairy site as an appropriate mixed use development.

5.26 In this respect it is clear that the current proposals broadly conform with the mix of uses advocated by the Council's draft site allocations document. Whilst it is acknowledged that this policy remains draft, the proposed release of the application site for non B Class uses within the up to date Local Plan confirms the site remains suitable for alternative development.

5.27 Accordingly there is no conflict with other plan objectives in terms of the principle of the proposed mixed use development.

5.28 The following paragraphs consider other plan policies and the merits of the proposals when judged against other relevant policies of the plan. In view of the above and the consideration of other relevant policies below it is considered that the proposals meet criterion ii) and the proposed mixed use scheme does not conflict with the policies and objectives of the 'saved' policies of the UDP or the Local Plan: Part 1.

iii. The proposal better meets the plan's objectives particularly in relation to affordable housing and economic regeneration

5.29 These issues are discussed below. In particular, the scheme will provide 36.5% of affordable units in line with the Local Plan: Part 1 requirement and will provide substantial economic benefits including significant job creation. In view the analysis below it is considered that the proposals meet criterion iii) and better meets the UDP and Local Plan: Part 1 objectives particularly in relation to affordable housing and economic regeneration.

b) <u>Economic Regeneration</u>

5.30 There is a significant investment in the site planned to bring the site back into full and purposeful economic use. The application site currently makes no contribution to the local economy, and the site is currently unattractive for local people. The proposals will also stimulate regeneration of the local centre with wider benefits.

5.31 Importantly, the proposed mixed use scheme will result in a significant number of local employment opportunities, including full and part time jobs within the foodstore, cinema and restaurants, in addition to supporting small business start ups in the proposed unit shops.

5.32 The scheme will create in the order of 650 full and part time jobs through the retail and leisure uses and that many of these jobs will be made available to local people. The table below provides a breakdown of the anticipated employment opportunities which will be created as a result of the proposed development.

Use	Anticipated No. of Jobs
Foodstore	160 Full Time 300 Part Time
Cinema	5 Full Time 56 Part Time
Restaurants	75 Full Time 50 Part Time
Unit Shops	4 Full Time 4 Part Time
Total	654 Full and Part Time jobs

5.33 In addition there is likely to be a number of indirect employment benefits with the on-going maintenance and management for the commercial development.

5.34 A considerable number of jobs will also be created during the construction stage of the development.

5.35 The Employment Land Report prepared by Grant Mills has sought to calculate the number of jobs that would be created if the site was redevelopment for an industrial/warehousing scheme. The assessment identifies that a standard industrial/warehousing scheme would only create approximately 282 jobs, whereby a large scale high bay warehousing scheme would create even less opportunities creating approximately 247 jobs. The Employment Land Report concludes that the proposed mixed-use scheme is likely to create far more job opportunities on the site than if it were redeveloped for general warehousing/distribution or large scale/high bay warehousing.

5.36 The economic benefits of the scheme are consistent with the Government's drive to stimulate the economy and supports economic growth, and the proposed scheme would create a significant number of employment opportunities suitable for local people.

5.37 These jobs would give the local area a welcome economic boast with potential spin off benefits for the local centre. The proposals will also assist in promoting sustainable travel patterns for shopping and leisure and will retain locally generated expenditure and be beneficial to the local economy.

c) Residential Development

5.38 This section considers the extent to which the proposed residential development accords with national, strategic and local planning policy.

i. Residential Demand/Need

5.39 The NPPF seeks to deliver a wide choice of high quality homes, widen the opportunities for home ownership and create sustainable, inclusive and mixed communities. Paragraph 23 of the NPPF recognises that residential development can play an important role in ensuring the vitality of

centres and encourages residential development on appropriate sites such as this which abuts the defined local centre and has previously been allocated in a draft plan document for mixed use development including residential.

5.40 London's role in the housing market is central to meeting national and regional housing need. Whilst regionally-identified targets have been revoked outside of London, the Mayor of London still has strategic responsibility for setting targets for housing delivery. The housing targets set out within the London Plan (2011) further emphasise the role that London plays in satisfying the national and regional housing need.

5.41 The London Plan (2011) allocates Hillingdon an annual minimum monitoring target of 425 residential units over the period 2011-2021 (Policy 3.3). This will enable it to meet its ten year target of 4,250 new homes. Policy 3.3 also sets out that borough should not only achieve but exceed minimum targets.

5.42 The adopted Hillingdon Local Plan: Part 1 sets a housing target of 3,650 dwellings between 2007 and 2017, and 5,475 dwellings over the Local Plan period (up to 2026). This will bring the Local Plan broadly in line with London Plan targets.

5.43 It is therefore recognised that at both the strategic and local level, that there is a material requirement for additional housing in Hillingdon, the application proposals will assist in meeting that need through the proposed provision of 104 units.

ii. Housing Mix

5.44 The residential development will provide 104 dwellings with a mix of houses and flats, comprising of private and affordable units. The proposed scheme will therefore make a considerable contribution to the identified housing target for Hillingdon.

5.45 The table below sets out the proposed housing mix

	1b2p (flat)	2b3p (flat)	2b4p (flat)	3b5p (House)	4b6p (House)	4b7p (House)	Total	%
Private	11	5	39	8		3	66	63.5
Affordable Units – Social Rent	6		13	3	1		23	36.5
Affordable Units - Intermediate	4		10	1			15	
Total	21	5	62	12	1	3	104	100

5.46 In accordance with Policy H4 of the UDP and the adopted Hillingdon Local Plan: Part 1 the proposed housing mix will provide private and affordable one and two bed properties as well as a range of larger three bed houses both market and affordable provision. The proposed layout ensures a distribution of affordable units over the site, with the affordable units proposed in Block A, D, H and G.

5.47 Also in accordance Policy 3.8 of the London Plan, the proposed development offers a range of housing choices, in terms of the mix of housing types, taking account of the housing requirements of different groups.

5.48 The residential development will provide 36.5% of affordable units in line with the requirement within the Local Plan: Part 1 and the affordable units comprise of a mix of flats and houses.

5.49 Overall, the proposed development will provide a suitable range of dwelling choices including family accommodation in accordance with NPPF (section 6), the London Plan (Policy 3.8) and the adopted UDP saved policies and Hillingdon Local Plan: Part 1.

5.50 The proposed residential development and the proposed provision of 36.5% affordable units is also in accordance with the draft Site Allocation Policy SA3 which stipulates a requirement for the provision of 35% affordable housing.

iii. Density

5.51 The UDP relies upon the London Plan standard in terms of density. In terms of the London Plan the site is best described as 'suburban' (areas with predominantly lower density development) and therefore has a suggested density range of up to 95 units per hectare and between 150 - 250 habitable rooms per hectare (hr/ha).

5.52 The application proposes a density of 73.24 units per hectare and 229.6 habitable rooms per hectare. Therefore the proposed density is consistent with London Plan policy.

iv. Tenure Mix

5.53 Policy 3.12 of the London Plan states that: the maximum reasonable amount of affordable housing should be sought when negotiating private residential and mixed-use schemes having regard to current and future requirements for affordable housing, adopted affordable housing targets, the need to encourage rather than restrain development, the need to promote mixed and balanced communities, the size and type of affordable hosing required in particular locations and the specific requirements of individual sites'. Policy 3.11 recognises that 60% of affordable housing provision should be social rent and 40% intermediate.

5.54 The level of affordable housing provision proposed and the tenure split for the proposed affordable housing is consistent with the London Plan and the Local Plan: Part 1.

v. Residential Space Standards

5.55 The Mayor's Housing SPG (2012) states that minimum space standards in residential units should apply to all units and not just affordable housing. Standard 4.1.1 within the SPG and Policy 3.5 of the London Plan sets out the following space standards which have been compared to the unit sizes being proposed within the development:

	Dwelling Type	Housing SPG Essential GIA sqm	Proposed Unit Size (either private or affordable) GIA sqm
Flat	1b2p	50	50.29 – 71.55
	2b3p	61	68.79 – 70.86
	2b4p	70	70 – 76.41
2 Storey House	3b5p	96	113.26
	4b6p	107	111.93 - 133.25

5.56 The above standards are also required by the London Borough of Hillingdon Accessible Hillingdon SPD (January 2010).

5.57 The internal layout of the proposed residential development meets dwelling size standards within the London Plan and Accessible Hillingdon SPD. The proposed scheme is therefore compliant with policy.

vi. Amenity Space and Children's Play Space

Private Amenity Space

5.58 All the units within this development will have access to private amenity space in the form of private gardens, shared communal space or a balcony at upper levels.

5.59 All residents will also have access to the piazza and the Square which provides additional public open spaces in additional to nearby public open spaces.

5.60 The amenity space provided for each block is set out below:

- Blocks A to D comprises of flats and has an amenity space provision comprising communal gardens and private balconies
- Block E comprises of houses and amenity space is provided in the form of private gardens
- Block F comprises of a combination of houses and flats and amenity space provision includes private gardens for the houses and a communal garden and private balconies for the flats
- Block G comprises of houses and amenity space is provided in the form of private gardens
- Block H comprising of flats with the amenity space provided in the form of a communal garden and private balconies

5.61 The proposed private amenity space fully accords with Hillingdon's Design and Accessibility Statement SPD.

Child Play Space

5.62 The GLA's online tool has been used to calculate the amount of play space required on the site as detailed in the Landscape Strategy. This requires 10sqm of play space per child. The GLA online tool calculates a child yield of 37 children based on the proposed housing mix and that a total of 366sqm of play space is required to support the proposed residential development.

5.63 The proposed play space is comprised of two playable spaces. The local playable space is approximately 250sqm in size and will be located at the heart of the residential element of the proposals. This will allow easy access and good surveillance. The local playable space will provide provision for children ages 5 – 11 yrs old with facilities for informal skateboarding, a basketball hoop and a climbing wall.

5.64 The scheme also includes a doorstep playable space of approximately 150sqm in size. The doorstep space will provide provision for 0 – 5 yr olds and will include playable objects, seats and sculpture elements. The doorstep playable space will comprise part of the Arla Square.

5.65 There is also two existing equipped play grounds within 800 metres of the proposed residential development at Yeading Brook to the north west of the site and off Long Drive to the north-east of the site, which will provide additional play space provision available in the local area.

5.66 The proposed play space is well related to the residential element of the proposed scheme, and will be provided in two separate areas adjacent to the proposed dwellings where there will be good natural surveillance. The proposed play strategy comprises of approximately 400sqm of provision, and therefore it is considered that an appropriate level of play space is provided in accordance with GLA's requirements. In addition to which there is off site provision within 800 metres of the site.

5.67 Overall, the application proposals provide good quality private, communal and play space in accordance with national, strategic and local requirements.

vii.Accessibility and Inclusive Design

5.68 The proposed residential development has been designed to provide an inclusive environment and to meet the needs of a diverse community. The different needs of people that use the building and its surroundings have been considered to ensure that everyone, regardless of age, gender or disability can use it.

5.69 All proposed units are to be build to Lifetime Homes standards. A total of 11 units (10%) are provided as wheelchair accessible units as follows.

- Social Housing = 4 wheelchair units
- Market Housing = 4 wheelchair units
- Intermediate Housing = 4 wheelchair units

5.70 As set out in the accompanying Design and Access Statement, each wheelchair accessible unit comprises an enlarged internal area and meets the requirements of the Accessible Hillingdon SPD. In accordance with the above, the required amount of wheelchair housing is provided.

d) <u>Retail and Leisure</u>

5.71 The Retail and Leisure Report deals with the retail and leisure planning issues arising from the application proposals. The report assesses the proposals against the retail and leisure planning policies of the development plan and the National Planning Policy Framework including the sequential and impact tests. The following sets out the key conclusions of the Retail and Leisure Report:

- Excluding South Ruislip, impact of the proposed Asda store upon town centres will be 4.7% at most. This level of impact cannot be regarded as significant. Furthermore, in reality the proposed floorspace is in part supported by the growth in available expenditure which means impacts are overstated. Furthermore a number of the stores have been shown as overtrading. Significantly, even with the predicted levels of impact all of the centres with the exception of just one will trade in 2017 at levels in excess of benchmark sales densities.
- Impact upon South Ruislip arising from the proposed Asda store (excluding the replacement Sainsbury's store) will be 16.4% however, 99.4% of that that impact will be upon the existing Sainsbury's store in south Ruislip which is acknowledged as over trading by 56%. Even after the diversion of trade to the proposed Asda store, Sainsbury's will continue to trade well in excess of the benchmark (+9.85M) in 2017.
- The town centre health checks demonstrate that each of the study area's centres performs a vital role and function within the retail hierarchy. Each centre will grow according to increases in available expenditure and therefore any impact arising from the application proposals will be phased and short lived. The foodstore will compete on a like for like basis meaning that it will help address overtrading at the nearby Sainsbury's store
- The proposed leisure uses will enhance the evening economy of South Ruislip
- The proposals will not alter the role and function of the South Ruislip as a local centre. Indeed, comparable proposals by Sainsbury's have been considered to be acceptable in this respect
- The proposals would not undermine any town centre strategies or planned or committed development
- The proposals will benefit South Ruislip through opportunities for linked shopping and leisure trips which will help to retain locally generated expenditure. In this way the proposals will promote more sustainable shopping and leisure patterns
- There are no suitable, available and viable sites to accommodate the proposals in more central locations even in a flexible and disaggregated form
- The proposed retail and leisure uses will provide a substantial number and range of employment opportunities for local people (650 jobs)

e) Layout Concept

5.72 As set out within the Design and Assess Statement the application site has a number of site constraints, which taken together with operator requirements have influenced the proposed layout of the scheme. The proposed layout of the scheme seeks to makes the best and most efficient use of the site and maximises benefits for the local area. The proposal scheme also takes on board comments raised by the Council, GLA and local residents.

5.73 It is important that the scheme is highly attractive to retail and leisure operators. In this location, this means that the proposed cinema/foodstore and restaurants uses need to have good visibility and a strong identity. Furthermore, the building floorspace needs to be efficient and regular in shape. These requirements together with the physical characteristics of the site inform the layout and design of the scheme.

5.74 The tapering nature of the site and a change in levels means that it is not possible to accommodate the foodstore and cinema uses in a location abutting the boundary of the defined local centre. Furthermore there are added difficulties associated with the safeguarded land (surface and below ground) for HS2 and the flight path for RAF Northolt (height restrictions).

5.75 The proposed scheme therefore has to provide a balance between the commercial needs of potential operators, site constraints and planning policies. The proposed solution is a scheme which creates a strong link with the existing shops and service comprised within the local centre through the creation of a new public square around which the new unit shops which will ne located to draw pedestrians into the site, where there is a very strong and attractive visual link to the new foodstore, cinema and restaurant uses. Careful attention has been paid to the linkages between the existing shops forming the local centre and the proposed commercial uses. The proposed commercial floorspace will be within easy walking distance of the existing shops (<250m). This arrangement makes the most efficient use of available land particularly as a large swathe of the original site has been safeguarded for HS2.

5.76 The proposed arrangement also minimises the extent of land used for dedicated service access and secures the best relationship between existing residents and the proposed dwellings i.e. amenity is protected. Separation between residential and commercial uses is very desirable but it would not be possible to achieve if, for example, the leisure or retail buildings were positioned further towards the southern end of the site. In contrast the northern most part of the site abuts existing industrial and warehouse uses which may have an unacceptable impact on the amenity of future residents.

5.77 Accordingly, given the constraints of the site and the commercial realities, the proposals seek to balance the interests of these competing needs through an appropriate design. The Design and Access Statement provides further analysis on the constraints of the site and the evolution of the proposed scheme.

f) <u>Transport</u>

5.78 The Transport Assessment and Travel Plans have been prepared by Redwood Partnership to support the application. The Transport Assessment measures and assesses the highway and transportation effects of the development proposals on the surrounding highway network, and reviews the sustainability of the development proposals against local and national guidelines.

5.79 The application proposals will provide a number of significant improvements to the public highway as explained within the Transport Assessment and summarised below:

- Improvements at the proposed main site access near to the Victoria Road/ West Mead Junction. The works will include:
  - The removal of the traffic signals at the Victoria Road/West Mead junction. The West Mead junction would revert to a priority junction with a new pedestrian refuge island on Victoria Road to provide for pedestrians crossing Victoria Road to the bus stop
  - The removal of the traffic signals at the Arla/Aviva service vehicle access
  - The closure of the access serving the Aviva site with provision of a new entrance through the new development
  - Relocated bus stops for both northbound and southbound services with new bus stop kerbing
  - The construction of a new traffic signal junctions to serve the new development with wider carriageway and footways and provision for new staggered pedestrian refuge islands
  - The provision of advanced stop lanes for cyclists

- Improvements at the Victoria Road/Long Drive traffic signals and additional works on Long Drive. The works will significantly improve pedestrian and cycle safety at this junction and a re-phasing of the traffic signals will provide significant benefits in terms of capacity and reducing congestion. The works include the following:

  - The replacement of the some of the multi-island pedestrian crossing facilities with wider staggered refuge islands
  - The widening of the Long Drive left turn lane into Victoria Road to create a lane where left turning traffic do not obstruct straight ahead traffic movements
  - The removal of pinch points which currently restricts traffic flows
  - Replacement traffic signal equipment as required
  - The alteration of traffic signal staging to improve junction capacity
  - Associated footway works around the junction
  - A new pedestrian link from Long Drive
  - Improved street lighting under the Long Drive railway bridge crossing
  - Upgrade of the footway route where necessary between South Ruislip Station and the new pedestrian link from Long Drive

g) <u>Environmental Reports</u>

Energy Strategy

5.80 The Energy Strategy has been prepared by Wallace Whittle to demonstrate how the development will comply with the carbon reduction targets set out within the London Plan and the Hillingdon Local Plan namely:

- 25% improvement on 2010 Building regulations up to October 2013
- Reduction in developments total predicted energy requirements on site from renewable energy

5.81 These targets will be met through the following strategy:

'Be Lean' – Use Less Energy

- Improved fabric performance beyond minimum compliance
- Improved certified air tightness beyond minimum compliance
- Low energy lighting and automatic control
- Mixed mode ventilation with heat recovery
- Low energy appliances
- Low fan and pump powers

'Be Clean' – Supply Energy Efficiently

- High efficiency gas boilers and gas fired CHP

'Be Green' – Use renewable Energy

- Roof mounted solar photovoltaic's producing renewable electricity
- Air Source Heat Pumps

5.82 In summary the energy strategy delivers:

- A 22.39% improvement on 2010 Building regulations through the 'Be Lean' and 'Be Clean' measures; 27.39% total improvement with 'Be Lean', 'Be Clean' and 'Be Green'.
- A 29% energy saving across the site when compared to the baseline model with the proposed 'Be Lean', 'Be Clean' and 'Be Green' measures.

Flood Risk Assessment

5.83 The development is situated within Flood Zone 1 according to the Environmental Agency flood maps, having a less than 1:1000 chance of fluvial flooding and in accordance with the National Planning Policy Framework is considered to be an appropriate development.

5.84 On site levels indicated on the topographical survey suggest that the development would sit in excess of 5m higher than the highest water levels recorded at the nearly Yeading Brook watercourse. Furthermore, information taken from the Hillingdon Strategic Flood Risk Assessment indicates that there is no history of flooding from sewers or ground water on the existing site.

5.85 The assessment concludes that the development is well protected from flooding, the on-site proposals will greatly reduce the threat posed by the site on to adjacent land and sewers and is likely to reduce the overall flood risk in the area.

Noise Assessment

5.86 The noise assessment sets out that there are a number of different predicted noise levels from various sources which have the potential to impact and these have been considered cumulatively. The noise assessment goes on to explain that the at existing receptors, the cumulative noise levels for peak hour levels of activity during the day and at night comply with the recommended guidelines values and are significantly lower than the existing noise climate.

5.87 As discussed within the assessment, at the proposed residential development site, mitigation measures will be necessary in the fabric of the buildings to achieve acceptable internal levels. This would be the case whether the foodstore/cinema development went ahead or not. The noise assessment concludes that having undertaken the assessment against objective criteria, it is concluded that development could proceed without the likelihood of subsequent operations causing significant impacts to existing or future local residents.

Contamination Report

5.88 A Phase I Geo-Environmental Assessment has been undertaken by WSP Environmental. The principal purpose of undertaking the assessment was to highlight geo-environmental considerations, predominantly with respect to ground, ground gas and ground water conditions. The site setting is considered to be of a low/moderate environmental sensitivity.

5.89 WSP have identified a low/medium risk of possible source-pathway-receptor contaminate linkages being present and recommends a further supplementary intrusive investigation is undertaken post demolition of the existing structures to facilities geotechnical and contaminant delineation of the ground beneath existing floor slabs. It is recommended within the report that an intrusive investigation is undertaken as part of a pre-development condition.

Ecological Appraisal

5.90 An Ecological Appraisal has been prepared by The Ecology Consultancy. A site survey was carried out at the site in March 2013 to complete a Preliminary Ecological appraisal of the site and to provide recommendation for protecting, managing and enhancing its wildlife values. A baseline ecology assessment (phase 1) has been undertaken including bat, reptile and nesting bird survey.

5.91 The site is not situated within or immediately adjacent to any statutory designed nature conservation sites. The nearest statutory site of importance for nature conservation is Islip Manor Meadows Local Nature Reserve (LNR) located approximately 1.40 kilometres south east of the site.

5.92 The appraisal concludes that the habitats on site were considered to be of low ecological value within the immediate vicinity of the site, and that the introduced shrubs and trees were considered to have only medium potential to support breeding birds on site.

5.93 Reptile and bat activity transect protected species surveys, carried out on site in 2011 (bat surveys are considered to be valid for approximately two years), have been reviewed to evaluate the potential likelihood of protected species using the site as it is currently. The Bat transect confirmed that no bats roosts were present on site and very little bat activity was recorded, concluding that bats do not pose a constraint to development proposals. Reptile surveys confirmed that retiles are absent from the site and do not pose a constraint to any future development.

5.94 A number of enhancement measures are recommended for the site, including planting schemes using plants known value to wildlife, including climbers along fences and walls in order to create living walls and provision of bird nesting opportunities through the addition of artificial nest boxes placed on suitable trees and buildings.

Archaeological Assessment

5.95 An archaeological desk top assessment has been prepared by Mills Whipp Projects. The site does not fall within a designated archaeology priority area or conservation area or close to any other heritage asset. The site is therefore considered to have a low potential for archaeological remains.

5.96 The report concludes that the extensive modern disturbances caused by the industrial buildings and services currently occupying the site are likely to have had a considerable impact on any potential archaeological deposits which might have been present. It is therefore very unlikely that any significant archaeology exists on the subject site. Under these circumstances it is suggested that the submission of a desktop report fulfils the archaeological requirements of the subject site and planning permission should be granted without archaeological constraints.

h) Section 106 Heads of Terms

5.97 Having regard to the conclusions of the reports submitted in support of the planning application, and the Council's Planning Obligations SPD a Section 106 package is envisaged to include the following heads of terms:

- Off site highway improvements including highway works

- Construction Training
- Employment Training
- Education
- Health Care Facilities
- Affordable Housing

6 CONCLUSION

6.1 In conclusion we consider the following benefits would flow from the proposed redevelopment of the Arla dairy site:

- The proposed scheme will result in a significant number and range of local employment opportunities, including full and part time jobs associated with the construction and operation of the foodstore, cinema and restaurants in addition to supporting small business start ups within the proposed unit shops
- The economic benefits of the scheme are wide ranging and are consistent with the Government's drive to stimulate the economy through sustainable economic growth including job creation
- The regeneration of a brownfield derelict site which currently makes no contribution to South Ruislip.
- The proposed scheme will help promote the vitality and viability of South Ruislip reinforcing its existing role and function
- The proposed foodstore will compete with the existing Sainsbury's store which is currently over trading. South Ruislip is already a main food and comparison goods shopping destination.
- Improved integration of the site with the local centre and the station through the provision of an attractive and legible pedestrian route through the site from Long Drive terminating in an attractive feature landscaped area with onward links to the Aviva retail warehouse units
- Opportunity to improve the main vehicular access into the site by providing a shared facility with the neighbouring retail warehouses
- Creation of a new public square around which it is proposed to provide 4 local unit shops
- Provision of a choice of main food store operators providing local competition without the need for any increased travel distances
- Improvements to the evening economy through the proposed cinema and restaurant uses. These will complement the existing leisure offer of the local centre. The leisure offer will assist in the reduction of the length of motorised journeys for local residents wishing to visit a cinema
- The proposed development will provide a catalyst for further investment in the local area including an increased likelihood that the two existing vacant retail warehouses will be brought back into full and purposeful economic use including improved linkages with the local centre
- Creation of a high quality, attractive and distinctive scheme of development that will provide a number of enhancements to the local area
- A package of highway improvements that will assist queuing and ease of pedestrian movement across Victoria Road and Long Drive
- A range and mix of high quality dwellings including accommodation suitable for families with a significant proportion of affordable units (35%)

6.2 This Planning Report together with the various documents which are submitted in support of the application proposals demonstrate that the proposed development complies with the development plan and relevant national planning policy and offers a substantial number of benefits. Accordingly, it is considered that planning consent should be granted for the application proposals.

DOCUMENT 1

Letter from London Borough of Hillingdon regarding Screening Opinion

HILLINGDON
LONDON

Paul Aldridge
Planning Director
RPS Group
14 Cornhill
London EC3V 3ND

Ref: **EIA/Screening/FormerExpressDairy/Final/IRT**
Date: **18 October 2012**

Dear Paul

SCREENING REQUEST IN ACCORDANCE WITH REGULATION 5(5) OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011

PROPOSED MIXED USE DEVELOPMENT
FORMER EXPRESS DAIRY, VICTORIA ROAD, SOUTH RUISLIP

Thank you for your screening request which was received on 3 October 2012.

Summary of Decision

There are a number of impacts that are not yet known, and the screening opinion provided very few details about the current environmental conditions, or the project itself. For example, it is difficult for the Council to make an informed decision on the traffic impacts of the proposal and would have expected more information.

However, based on the probability, the Council does not consider that the development is likely to have significant environmental effects. Therefore EIA is not required. It should be noted that once more information does become available then there is a possibility that this decision maybe reviewed. For example, a transport assessment may reveal significant problems that go beyond local importance.

Although the Council does not consider the development to need EIA, it does not

remove the possibility of a refusal on grounds of unacceptable environmental performance.

If you wish to discuss any of the information above or in the following opinion, please do not hesitate to contact me using the details at the foot of the first page.

Yours sincerely

Ian Thynne
Principal Sustainability Officer

HILLINGDON
LONDON

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 Request for Screening Opinion

PROPOSAL	**Foodstore with petrol filling station (circa 8,545sqm)** **Unit shops (circa 2,450sqm)** **Hotel (70 bedrooms)** **Cinema (circa 3,715sqm)** **150 Residential Units** **Restaurants and Drive-thru (circa 2,475sqm)**
SITE	**Former Express Dairy, Victoria Road, South Ruislip**
RECEIVED:	**3 October 2012**

Section A **Relevant EIA Schedule**	
A1. Is the project Schedule One?	**NO**
A2. Is the project Schedule Two?	**YES** If Yes proceed to B Schedule 2(10b) Infrastructure Projects

Section B Selection Criteria for Screening Schedule 2 Development	
B1 Characteristics of Development	
Site Area	5.83 Hectares (approx)
Consideration of other developments: **Yes**. The application should be considered in cumulation with one other significant development	
Council Reference	33667/APP/2009/116
Location	Sainsbury Store and Land Adjacent to Long Drive, Ruislip
Description	Extension to existing store and provision of a new borough library, decked car park and associated landscaping.
Use of natural resources Not significant	
Production of waste Not significant	
Risk of Pollution and nuisances Not significant	
Risk of accidents (chemical, hazardous, combustion etc) Not significant	

B2 Location of Development	
Existing land use	The site is currently derelict having closed as a dairy in 2005. The buildings remain on site but are redundant.
The relative abundance, quality and regenerative	The site is within an area under severe water stress. This means that water availability is not considered abundant.

capacity of natural resources in the area	
Presence of wetlands	No
Presence of coastal zones	No
Presence of mountain and forest areas Presence of nature reserves and parks	The site has no formal designations. There is a Borough Grade 2 Site of Importance for Nature Conservation covering the railway embankments to the east of the development site.
Presence of sensitive ecological areas (Ramsar Site, AONB, SSSi etc…)	
Areas notified as poor quality (AQMA, Contaminated Land etc...)	The lies just on the edge of an air quality management area.
Densely populated areas	Densely populated urban areas surround the site.
Landscapes of historical, cultural or archaeological significance	There are no listed structures on site, but there is a locally listed building immediately to the east of the site. (The Middlesex Arms on Station Approach)
Areas at risk from flooding	No

B3 Characteristics of the potential impact

Assessment of the characteristics with particular consideration to the following:

- *the magnitude and complexity of the impact*

- *the probability of the impact*
- *the extent of the impact (geographical area and size of the affected population)*
- *the transfrontier nature of the impact*
- *the duration, frequency and reversibility of the impact*

Paragraph 33 of Circular 02/99 also states:

In general EIA will be needed for Schedule 2 developments for:

- *major developments which are of more than local importance*
- *developments which are proposed for particularly environmentally sensitive or vulnerable locations*
- *developments with unusually complex and potentially hazardous environmental effects*

The following assessment of impacts considers the details outlined in B1 and the information provided within the screening report. A precautionary approach is adopted where a lack of details makes it difficult to fully understand the extent of the impacts and operations of the development. These impacts are then assessed against the geographical details and receptor outlined in B2. The Council holds certain records on some of these receptors, e.g. Air Quality, but for others it is difficult to fully understand the sensitivity of a receptor without more detailed information e.g. the depth of groundwater and the type and quantity of materials above it.

The assessment of significant effects is a measurement of the potential impacts (applying a precautionary approach) on environmental receptors (taking into account sensitivity).

Water Resources and Flood Risk

The site is within a severely water stressed area and therefore the consumption of large quantities of potable water is an issue of more than local importance. It is not clear from the screening report the extent of water usage with this development however onsite demand is likely to be high but of not more than local importance.

The development's effects on water resources and flood risk are considered unlikely to be significant in the context of EIA. A future submission will need to demonstrate water reduction methods, and include a flood risk assessment.

Ground Conditions

The screening report suggests that a preliminary ground investigation report has revealed

the site to have a low risk of contamination. The report has not been attached to the screening request. Furthermore, intrusive investigations have been restricted by the presence of buildings. There is no information to demonstrate that the development will pose an unacceptable risk, but further information will be required as part of the planning application. In addition, if further investigations reveal significant levels of contamination then this could trigger the need for EIA.

The risk to and from the development from poor quality ground conditions is considered to be low pending further investigations.

Landscape and Visual

The site is predominantly industrial but is surrounding by large urban areas to the north, east and west and a railway line to the south. Beyond the railway line lies more residential areas. The site has been heavily industrialised and is dominated by large 'shed' type structures.

The visual and landscape impacts of the development are not considered to be significant in the context of EIA but a subsequent planning application will need to demonstrate that the proposals will be appropriate in the existing landscape.

Cultural Heritage

The proposals are not likely to have a significant environmental effect in the context of EIA.

Ecology

The redevelopment of the site is unlikely to have significant environment effects in the context of EIA. A subsequent planning application will need to demonstrate enhancement measures.

Transport

The past uses are likely to have had an important role in the transport network. The proposed development needs to be considered alongside the potential traffic generation from the existing site should it be in full operation.

There is very limited information on the previous transport uses, nor those attached to the proposed development. Furthermore, there is an existing foodstore on the opposite side of Long Drive.

The cumulative impacts of the new development, with the existing superstore, and any increases generated from the proposed extension (approved, but not yet completed) does

cause concern. The A40 (a major regional scale road) is situated to the south of the site, and the impacts on this will need to be carefully considered.

It is not yet considered likely that this area north of the A40 will be significantly impact in the context of EIA, however, further information may come to light that reverses this opinion.

It is normally appropriate to provide some level of information with a screening request to allow for a more informed decision on the likely impacts.

It is not considered likely that the extent of vehicular movements will give rise to significant adverse effects. Further information will be required with the planning application which may trigger EIA.

Air Quality

There will be negative impacts on air quality, but the current background levels are not at a level considered to be of more than local importance. A subsequent planning application will need to demonstrate minimal impacts on air quality and aim for air quality neutrality or better where possible.

The impacts on Air Quality are not likely to have a significant environmental effect.

Noise

The impacts are not likely to generate significant effects on noise.

Socio Economic

EIA requires impacts on the 'population' to be considered. General practice has interpreted this as socio economic effects, although the details of what should be assessed are subjective. In this instance the cumulative impacts of two large superstores, together with further proposals for retail units in the area need to be carefully considered.

The impacts on the population are not likely to be significant, but further consideration will be need in the planning application in the way of a retail impact assessment.

Section C Determination on EIA
C1 Summary
Is this a major development of more than local importance? No
Is the development for a particularly environmentally sensitive or vulnerable location? No
Is the development for unusually complex and potentially hazardous environmental effects? No

C2 Conclusions
The development falls within the thresholds of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Using the selection criteria outlined in Schedule 3 of the Regulations the London Borough of Hillingdon does NOT consider that the proposals require EIA.

The London Borough of Hillingdon has adopted this Screening Opinion in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

Head of Consumer Protection, Sport and Green Spaces **Date: 18 October 2012**

DOCUMENT 2

GLA Letter

GREATER**LONDON**AUTHORITY

Development and Environment Directorate

City Hall
The Queen's Walk
More London
London SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk
Our ref: PDU/2481a
Date: 15 October 2012

Paul Aldridge
RPS
14 Cornhill
London
EC3V 3ND

Dear Paul,

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: Former Express Dairies Depot.
LB: Hillingdon
Our reference: PDU/2481a

Further to the pre-planning application meeting held on 1 October 2012, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,

Colin Wilson
Senior Manager – Planning Decisions

cc Alex Williams, TfL

Direct telephone: 020 7983 5823 **Fax:** 020 7983 4706 **Email:** jonathan.aubrey@london.gov.uk

GREATER**LONDON**AUTHORITY

PDU/2481a

15 October 2012

Former Express Dairies Depot

in the borough of Hillingdon

The proposal

Comprehensive hybrid application for mixed-use re-development: full consent for a supermarket (8,545 sq.m. gross), shop units and community uses (2,450 sq.m. gross). Together with a hotel and 11 Screen Multiplex cinema (3,715 sq.m. gross); Car parking (circa 550 spaces); and family themed restaurants including Drive-Thru (2,475 sq.m. in total). The applicant will seek outline consent for development of residential units (circa150 houses/flats).

The applicant

The agent is **RPS** and the architect is **Mountford Pigott**.

Context

1 A request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 1 October 2012 a pre-planning application meeting was held at City Hall with the following attendees:

GLA

- Jonathan Aubrey, Senior Strategic Planner (Case Officer)
- Lyndon Fothergill, Principal Strategic Planner
- Euan Mills, Design Officer
- Keith Routledge, Energy Officer
- Rachel McElhone, Transport for London

Applicant

- Toby Baines - Albemarle Developments ltd
- Andrew Rennie - Albemarle Developments ltd
- George Hardcastle - Albemarle Developments ltd
- Andrew Thomson - Thomson Planning (Planning consultation for Arla)
- Neil Cowburn - Arla Foods
- Paul Mclaughlin - Redwood Partnership (Transport consultant)
- Ian Robinson - Mountford Pigott (Architect)
- Sid Jackson - South Ruislip Local Residents Association
- Paul Aldridge - RPS (Planning consultants for Albemarle Developments

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application. Please note that the quality of the advice

you receive will be dependent upon the documentation that you let us have in advance of the meeting.

3 The advice has been sent within ten working days of the pre-planning application meeting in accordance with the pre-application service standards.

Site description

4 A 5.52 hectare site located within South Ruislip in West London. The site was most recently used a dairy factory by Arla Foods that closed in 2005.

5 The site sits under the flight path of the Northolt Aerodrome and is currently accessed off a small side road leading off Victoria Road. The site is essentially land locked without a road frontage and is bound to the south by the mainline and tube tracks, to the west by industrial and vacant retail units; to the east by residential properties along Victoria Road and on the southeastern/eastern corner is bound by small shops, a hotel, a cash and carry and some railway arch uses including a car repair facility.

6 The main part of the site is generally flat, although there is a level difference towards the north west of the site, which is elevated above the main site.

7 As pointed out at the meeting, the pub site (on Long Road) is not included within the 'red-line' boundary although an agreement has been reached in relation to the pedestrian link from Long Road.

Details of the proposal

8 Comprehensive hybrid application for mixed-use re-development: involving full consent for a supermarket (8,545 sq.m. gross), local retail (unit shops) and community uses (2,450 sq.m. gross). Together with a Hotel and 11 Screen Multiplex cinema (3,715 sq.m. gross); Car parking (circa 550 spaces); and family themed restaurants including Drive-Thru (2,475 sq.m. in total). The applicant will seek outline consent for development of residential units (circa150 houses/flats). The key features of the proposed development are:

- Two areas of development are a big box development comprising a supermarket with a cinema and associated leisure use, and smaller scale community use and hotel element with residential uses defining a homezone road link running parallel to Victoria Road
- The opening up of the site through a pedestrian link from Long Drive into the existing town centre and two new road access points form Victoria Road.
- A new public square is proposed close to the pedestrian link.
- Extensive areas of car parking in front of the proposed foodstore and cinema.
- The homezone allows for residential uses to partly define the route and create an edge to existing homes on Victoria Road.

Strategic planning issues and relevant policies and guidance

9 The relevant issues and corresponding policies are as follows:

• Housing	*London Plan; Housing SPG; Interim Housing SPG; draft Housing SPG; Housing Strategy; draft Revised Housing Strategy; Providing for Children and Young People's Play and Informal Recreation SPG; draft Providing for Children and Young People's Play and Informal Recreation SPG;*
• Affordable housing	*London Plan; Housing SPG; Interim Housing SPG; draft Housing SPG; draft Affordable Housing SPG; Housing Strategy; draft Revised Housing Strategy; draft Early Minor Alteration to the London Plan*
• Density	*London Plan; Housing SPG; Interim Housing SPG; draft Housing SPG*
• Urban design	*London Plan;*
• Mix of uses	*London Plan*
• Regeneration	*London Plan; the Mayor's Economic Development Strategy*
• Transport	*London Plan; the Mayor's Transport Strategy; Land for Transport Functions SPG, Land for Industry and Transport SPG*
• Parking	*London Plan; draft Early Minor Alteration to the London Plan; the Mayor's Transport Strategy*
• Retail/town centre uses	*London Plan*
• Employment	*London Plan; Industrial Capacity SPG; draft Land for Industry and Transport SPG*
• Access	*London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
• Equal opportunities	*London Plan; Planning for Equality and Diversity in London SPG; Equal Life Chances for All (Mayor's Equalities Framework); Equalities Act 2010*
• Ambient noise	*London Plan; the Mayor's Ambient Noise Strategy;*
• Air quality	*London Plan; draft Early Minor Alteration to the London Plan; the Mayor's Air Quality Strategy;*
• Sustainable development	*London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
• Tourism/leisure	*London Plan; Good Practice Guide on Planning for Tourism (DCLG)*
• Hazardous substances	*London Plan; Circular 04/00*

10 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hillingdon Core Strategy 2012, the saved policies of the Hillingdon Unitary Development Plan, Hillingdon Draft early Consultation Site Allocations DPD and the 2011 London Plan.

11 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The Hillingdon draft Site Allocations DPD
- The Early Minor Alteration to the London Plan

Summary of meeting discussion

Principle of development

12 The principle of development was discussed at the meeting and it is concluded that whilst the principle of mixed use development is acceptable on site and the inclusion of community facilities is welcome, the quantity of proposed retail and leisure floorspace is not compliant with the London Plan.

Retail Impact Assessment

13 The applicant has presented the case for the convenience retail floorspace in the supermarket in their pre-application report and at the meeting. Should the applicant proceed with an application based on the current proposals the GLA require a comprehensive retail impact assessment in compliance with London Plan policy 2.15 Town Centres, policy 4.7 retail & town centre development and policy 4.8 supporting a successful & diverse retail sector. It is further suggested the applicant make reference to the 2009 London town centre health check analysis report which can be found at:

http://static.london.gov.uk/mayor/planning/docs/towncentrehealthcheck2009.pdf.

14 It is understood both the retail impact assessment and sequential test are to be undertaken after consultation with Hillingdon Council and it is recommended further consultation should be undertaken with adjacent boroughs of Harrow and Ealing. This wider consultation should be evident within the retail impact assessment report.

Evidence on retail hierarchy, demand and capacity

15 As discussed at the pre-application meeting London Plan policy 2.15 Town Centres, policy 4.7 retail & town centres and policy 4.8 supporting a successful & diverse retail sector all provide the strategic policy context in which the applicant's proposals are considered.

16 GLA officers have assessed the retail element of the proposals on the existing evidence. At the strategic level the primary issue is that the London Plan does not include South Ruislip in the strategic town centre network (table A2.1 town centre classifications and broad future directions). Issues relating to this are set out in paragraphs 22 -27.

17 At the local borough level South Ruislip is identified in the Hillingdon Core Strategy as a lower order local (neighbourhood) centre on the third tier of the retail hierarchy. Where the defined centre hierarchy consists of the metropolitan centre Uxbridge (where growth is to be focused) and the district centres of Eastcote, Hayes, Ickenham, Northwood, Ruislip and Yiewsley & West Drayton. The Core Strategy does not allow for substantial additional retail floorspace in these centres other than 18,855 sq.m. net comparison floorspace for Uxbridge – based on maintaining its market position from competition from Westfield, High Wycombe and Brent Cross. Furthermore, the Core Strategy defines South Ruislip local centre and core shopping area boundary very tightly and does not incorporate the application site behind Long Drive.

18 The Hillingdon Retail Study up-date 2012, which provided supportive evidence to the Core Strategy, concludes that there is limited additional need for convenience floorspace, with no capacity for additional convenience goods retailing in the next five years (Table 1) across the borough. Furthermore that there is no issue of over trading in the borough convenience stores. It does however further state that there maybe a qualitative need for additional convenience floorspace in the north of the borough.

Table 1: Hillingdon convenience goods capacity

Convenience goods	2016	2021	2026	2031
Residual expenditure (£m)	£5.9	£33.2	£60	£88.9
Floorspace Capacity (sq.m. net)	486-972	2,709- 5,418	9,647 – 13,781	7,040 – 14,079

19 The applicant indicated that they attended the EiP and made representations concerning the borough retail hierarchy and the potential for changing the position of South Ruislip in the existing hierarchy. In addition representations were made that the level of future convenience floorspace need was greater than indicated in Hillingdon Retail Study up-date 2012.

20 The EiP Inspectors report (July 2012) concluded that the Hillingdon retail hierarchy remain unchanged with South Ruislip retaining the status of a local centre and furthermore the evidence relating to convenience floorspace in borough retail study was on balance supported. Therefore the conclusion was there should be no change in the Hillingdon retail hierarchy over the core strategy plan period and that there is no requirement for additional floorspace until 2025.

21 The potential effect on town and district centres will need to be demonstrated in the applicant retail impact assessment and sequential test – especially on the vitality and viability of existing centres and should include the surrounding authorities of Harrow and Ealing centres. Though extremely strong evidence would be needed to justify such a significant variation from the recently adopted and tested policy framework.

London Plan policy compliance

22 The applicant in its pre-application report stated that the London Plan policy is incorrect to continue to include a test of scale of impact as this is not included within the NPPF, but paragraph 26 of the national policy states:

"When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m).This should include assessment of:

- *the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- *the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.*

23 Paragraph 27 goes on to say *"Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused."*

24 The test of scale is still contained within the London Plan and will remain a component when considering retail policies against the network of strategic retail centres identified in the London Plan. The issue is not just a matter of the scale of the retail proposals it is the impact on the quantum of additional floorspace proposed on the viability and vitality on the retail hierarchy in Hillingdon and adjacent boroughs of Harrow and Ealing retail centres and the appropriate level of floorspace in London town centre network of retail centres.

25 The London town centre health check report (December 2009) sets out the average floorspace use by type of town centre (table 2), this gives an indication of a centre's role and function. The proposals together with the existing convenience floorspace would result in the South Ruislip needing to move up the retail hierarchy to being defined as a district/major retail centre.

Table 2: Average London Town Centre Network

Classification	Comparison Goods (sq.m.)	Convenience Goods (Sq.m.)	Service retail (Sq.m.)	Leisure (Sq.m.)
International	535,294	28,467	39,635	273,015
Metropolitan	104,104	13,147	7,768	28,280
Major	29,909	10,984	6,798	17,361
District	9,455	5,213	3,566	6,695

26 Furthermore Table 4.2 of the London Town Centre Health Check (December 2009) report (Table 3) below indicates core indicators and broad thresholds which confirms town centre classifications. This table indicates the potential impact of the level of retail floorspace on the London Plan strategic network with the proposed retail floorspace, in addition to the existing Sainsbury's supermarket, would require South Ruislip to have district centre status.

Table 3: Town centre classifications: core indicators and broad thresholds

	International	**Metropolitan**	**Major**	**District**
Total town centre floorspace (retail service leisure)	240,000+	100,000+	50,000+	10-50,000
Total retail floorspace	200,000+	85,000+	35,000+	6,000+
Total comparison goods retail floorspace (sq.m.)	180,000+	65,000+	20,000+	4,000+
Comparison goods retail as percentage of total retail floorspace	85%+	75%+	60%+	60%
Convenience goods retail as percentage of total retail floorspace	<10%	<20%	<30%	Variable 10-60%
Leisure services (sq.m.)	250,000+	20,000+	10,000+	2 -10,000+

27 The applicant retail impact assessment will need to convince both the borough and GLA that the proposed retail development is acceptable, as the floorspace proposed would also result in South Ruislip needing to be moved up both the Core Strategy retail hierarchy and attain district and potentially major centre status in The London Plan – both of which need to be achieved through the strategic plan making process. The GLA will beginning the process for a review of London Town Centre Health Check for 2012 -13 which will inform potential alterations to the London Plan town centre classification. The applicant should approach the borough on this process as soon as possible as this is the only way change the town centre classification.

Leisure use

28 The London Plan recognises that culture plays a valuable role in place shopping, especially by engaging young people in wider community activity. It is therefore important to expand

London's cultural offer beyond Central London and especially in town centres, as well as maintaining and enhancing the quality of facilities in and around the central activity zone (CAZ). It requires development should address deficiencies in facilities and provide a cultural focus on fostering more sustainable local communities (Policy 4.6 Bb). In preparing LDFs, boroughs should designate and develop cultural quarters to accommodate new arts, cultural and leisure activities, enabling them to contribute more effectively to regeneration (Policy 4.6Cc).

29 The 2009 Town Centre Health Checks indicates that there is a lack of cultural facilities such as cinemas and theatres in the borough of Hillingdon and the provision of a cinema could possibly contribute to reducing this shortage of such facilities. However, the scale of the proposed cinema (3,717 sq.m) is not related to the size, role and function of South Ruislip as a local centre (table 3), which is contrary to the London Plan policy (Policy 4.7Bb). The NPPF (Section 2) under ensuring the vitality of town centres, states that local authorities, should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites. The applicant should therefore proactively engage with the borough to seek opportunities to accommodate the proposed cinema development.

Housing

30 The applicant has proposed a scheme of 150 (houses/flats) but no details are provided on the residential unit mix and level and approach to affordable housing provision. Therefore what is set out in this section is an overview of the policy requirements to guide a development that will comply with the London Plan. The provision of residential accommodation on the site together with community facilities is supported in principle, subject to providing an appropriate mix of unit types, tenure types and quality of design.

Housing mix

31 London Plan policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing. Recent guidance is also set out in the London Plan Interim Housing SPG (April 2010). Also relevant is policy 1.1, part C, of the London Housing Strategy, which sets a target for 42% of social rented homes to have three or more bedrooms. As the applicant is intending bring forward the housing as an outline application the mix will be required to be agreed and included in any future s106 agreement.

Affordable housing

32 London Plan policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to it's own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale. The Mayor has published an early minor alteration to the London Plan to address the introduction of affordable rent, with further guidance set out in a draft Affordable housing SPG. With regard to tenure split the Mayor's position is that both social rent and affordable rent should be included within the 60%.

33 While the Mayor has set a strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

34 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit or other recognised appraisal methodology is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation.

35 At the meeting the applicant stated the level of affordable housing had yet to be estimated and this was to be led by their viability assessment. The Hillingdon Council local requirement in the Core Strategy is for 35% of any future housing development to be affordable housing. This should be the site target unless proven otherwise by the viability assessment. Whatever the final level of affordable housing provided by the applicant, it will need to be justified through a viability assessment using the GLA/ Three Dragons Tool Kit and this will be independently reviewed.

36 The GLA will expect the affordable elements to reflect the strategic target of 60% social and affordable rented and 40% for intermediate rent or sale. The applicant should enter early discussions with registered providers to ensure that the affordable products reflect the priorities of the Mayor, particularly with regard to affordable rented housing.

Housing density

37 London Plan policy 3.4 seeks to optimise the potential of sites having regard to local context, design principles and public transport accessibility. The submitted application should be accompanied by an estimate of development density and this should relate to table 3.2 of the London Plan

Urban design

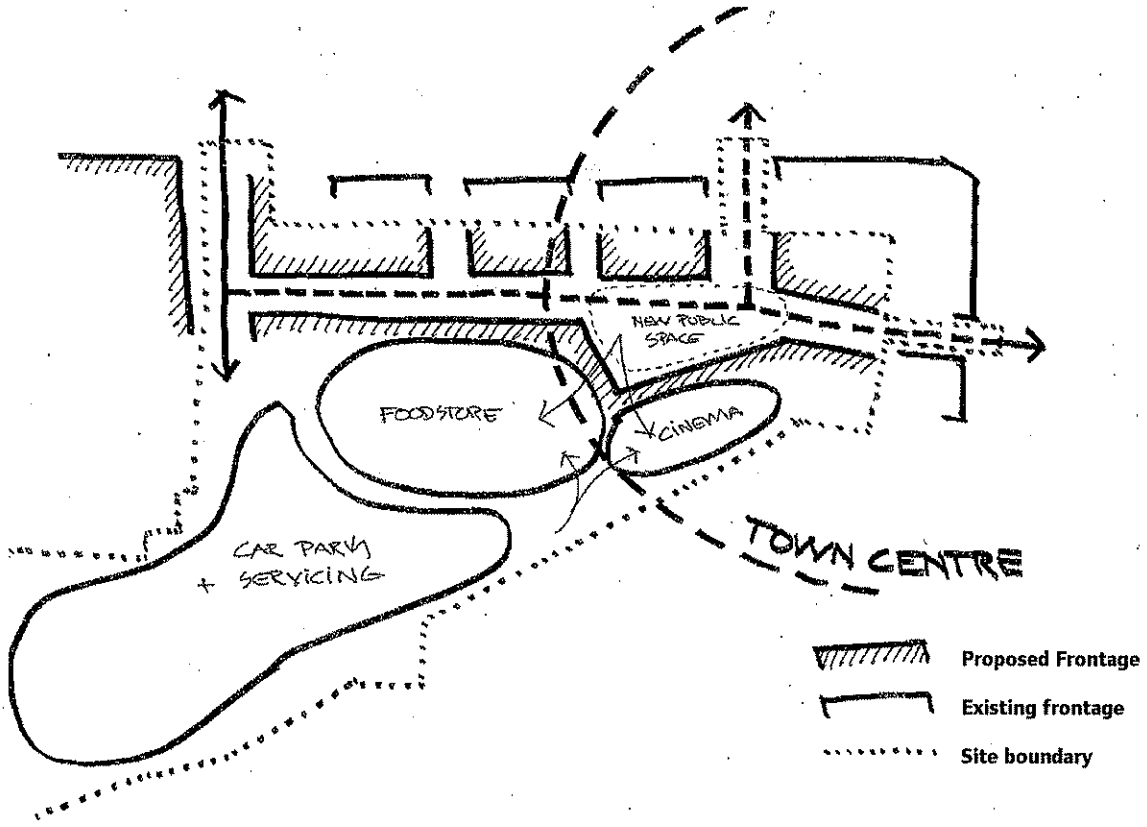
38 The scheme proposes the development of a number of retail sheds surrounded by car parking in the edge of the South Ruislip local town centre. There is significant concern that this proposed typology creates a poor quality pedestrian environment that is not appropriate for this location nor would it successfully integrate the new centre with the existing centre. Officers accept the challenges of accommodating large footprint retail sheds within an urban environment, but are not convinced the proposal successfully achieves this. Consideration needs to be given to wrapping all car parking, servicing and blank frontage with more active uses as illustrated in the diagram below (Figure 1).

39 The aspiration of creating a new street through the site is welcomed, but for this to be successful it needs to be activated by high quality frontage along its whole length. To achieve this activation the applicant should consider locating all of the car parking and servicing at the southern end of the site, so it is screened by the food store and cinema buildings. The food store should also be wrapped with community and commercial uses on the ground floor along its northern edge to avoid large expanses of blank frontages looking on to this new street.

40 A small amount of residential uses are proposed along the north east of the site. Whilst the idea of a mixed use development is welcomed in principle, there is concern that this does not create a contiguous town centre experience and consideration should be given to locating the

residential only buildings towards the west of the site and focusing all town centre uses to the east, including the cinema.

Figure 1: Suggested alternative approach to site layout



41 The applicant is also asked to provide an indication of how the site to the west of the development might be redeveloped in response to the proposal. This site will play an important role in the character of the proposal and needs to be considered in conjunction with it.

42 The suggested alternative approach to the development layout would provide a solution that would closely fit with London Plan retail policy 4.7 (part B) where edge of centre development proposals should show how they are integrating with the existing retail centre and public transport.

Housing design quality

43 The applicant at the pre-application stage indicated that the future housing proposals would be in outline. In formulating the design for the housing the application should include sufficient detail to demonstrate compliance with London Plan policy and the London Housing Design Guide. This should be through parameter plans and design coding and acceptance of GLA minimum housing space standards (Policy 3.3: table 3.3) in any s106 agreement.

Access and inclusive design

44 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). The design and access statement should explain

the design thinking behind the application and demonstrate how the principles of inclusive design, including the specific access needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed. Early engagement and consultation with the local access group and any local organisations of disabled people is also recommended.

45 The applicant should be made aware that Policy 3.8 requires all residential units (100%) will be designed to the Lifetime Homes standard and of these 10% will be wheelchair accessible units. In line with London Plan Policy 3.8 Housing Choice the applicant should demonstrate that the design of the residential units meet the 16 Lifetime Home standards (see www.lifetimehomes.org.uk), and that the 10% of new wheelchair accessible homes meet the standards set out in the GLA's Best Practice Guide on wheelchair accessible housing (see http://www.london.gov.uk/strategy-policy/accessible-london-achieving-inclusive-environment.) Typical flat layouts and plans of the wheelchair accessible homes and the Lifetime Homes units should be included in the design and access statement to illustrate the relevant features.

46 It should be clear on the plans where the wheelchair accessible flats are located and how many there are. These should be distributed across tenure types and flat sizes to give disabled and older people similar choices to non disabled people (unless the council through their Accessible Housing Register work can advise on the need in this part of the borough for a particular size of wheelchair accessible unit). The checklist in the GLA's best practice guide provides a useful reference for ensuring that the key features of wheelchair accessible homes have been addressed. Generous use of space and careful layout planning can help to ensure that more than the minimum number of homes are easily adaptable helping to provide greater choice for people who use a wheelchair or who benefit from a wheelchair accessible flat (such as older people who also have mobility equipment storage needs and benefit from level access showers etc).

47 The design and access statement should demonstrate that adequate provision of blue badge parking bays has been made for employees, visitors and residents to all the uses proposed, in line with London Plan Policy 6.13 Parking and Table 6.2. The provision and future management of the blue badge parking bays for the residents should be in line with the advice in the Lifetime Homes standards and the Wheelchair Housing Design Guide, and these bays should be located as close as possible to the relevant residential entrances or cores. The parking management plan should include a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced. The travel plan should also address the specific access needs of disabled people and older people. If the wheelchair accessible units are to be 'easily adaptable' it may be acceptable to have some of the parking bays associated with these flats large enough to be used as or marked up as disabled persons parking bays if required at a later date, and the management of these bays (to ensure that they are available at a later date) should be highlighted in the parking management plan.

48 Disabled persons parking should be provided to the hotel and surgery/ community uses as close as possible to their principal entrances, as opposed to 150m away in the supermarket car park, however it should also be ensured that the route from the supermarket car park, up to these uses is appropriately designed for all users.

49 Disabled persons parking bays should also be provided as close as possible to each of the proposed uses in the main external car parking area i.e. cinema and restaurant uses.

50 Extending the Lifetime Home concept to the neighbourhood level can help to ensure that the public realm, the parking areas, the routes to the site and links to adjacent public transport and local services and facilities are also designed to be accessible, safe and convenient for everyone,

particularly disabled and older people. This concept can also help to meet the specific needs of older people (see the CLG report 'Lifetime Homes Lifetime Neighbourhoods a National Strategy for Housing in an Ageing Society' and the emerging advice from the Lifetime Neighbourhoods Foundation (see http://www.lifetimehomes.org.uk/pages/lifetime-neighbourhoods.html). The design code should address these criteria and have regard to other best practice standards in achieving inclusive access.

51 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The proposals should ensure that the routes from the public transport facilities to the new homes and commercial uses are legible and that wayfinding is easy with clearly identified entrances at street level to make access easy, safe and comfortable, particularly for disabled people. The Design and Access Statement should show how disabled people access each of the buildings safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc, and how any level changes are to be addressed.

52 The applicant should confirm in their design and access statement that all crossing points proposed as part of this development, including those to surrounding roads, the new road junction, and within the site i.e. through the car park etc. incorporate correctly designed dropped kerbs in accordance with the DfTs "Guidance on the use of tactile paving surfaces", to ensure that this element of the proposals is accessible, safe, and navigable for disabled people.

53 There are concerns regarding the main pedestrian route into the site which runs through the residential development, up to the commercial elements. A 'home zone' approach may not be suitable for this route, given that people using it will not only be accessing the residential units (i.e. traditional home zone principles) but also commercial uses. The pedestrian element of this route should be prominent, and preferably segregated from any vehicles routes/ areas.

54 The applicant's should provide details of this route in their design and access statement, along with information on how pedestrians, vehicles and cycles will be segregated.

55 The 'home zone' approach should also not be applied to the routes surrounding the hotel, surgery and community uses as these are not residential uses and will generate vehicle trips in their own right - details of the segregation which will be applied to the routes up to and areas around these uses should be provided.

56 For the rest of the residential development, a 'home zone' approach may be appropriate, however policy 6.37 of the London Plan emphasises the importance of providing *"safe and attractive routes that are easy to navigate"*, and 6.38 explains that *"Walking issues should be addressed in development proposals, to ensure that walking is promoted and that street conditions, especially safety, security and accessibility for disabled people, are enhanced."* If shared surfaces/ a home zone approach are/ is proposed, the applicants should illustrate what design features will be incorporated to ensure that the areas are safe and usable for disabled people (possibly creating a 'safe zone' where vehicles cannot travel or park). Information regarding how people (in particular blind and partially sighted people) will know when they are transitioning from a segregated pedestrian environment, into a home zone/ different arrangement in terms of segregation, should be provided. Further information is therefore required on this element of the proposals.

57 Where external seating is proposed within this development, it (or some of it, depending how much is proposed) should incorporate back rests and arm rests to ensure that it is as usable as possible for as many people as possible.

58 If children's play equipment is to be provided, the applicant should demonstrate in their design and access statement what elements of this will be accessible for disabled children.

59 A research study undertaken by Grant Thornton on behalf of the GLA and the LDA looked at how inclusive design principles can be applied to London's hotel accommodation and has assessed that less than 2% of existing stock is accessible to disabled people, making it difficult for disabled people to find an accessible hotel, particularly when linked to other access barriers such as location near accessible public transport facilities or the availability of blue badge parking provision. London Plan policy 4.5 Visitor Infrastructure therefore asks for at least 10% of new hotel bedrooms to be wheelchair accessible and for applicants to submit an Accessibility Management Plan which sets out how the continuing management of the hotel will ensure the accessible rooms are maintained and managed, helping inclusive access to become part of the overall operation and business of the hotel (in a similar way that travel plans can ensure a commitment to sustainable travel patterns after occupation). The design and access statement should include typical room layouts and demonstrate where the accessible rooms will be.

60 PAS 88:2008 also states that one disabled persons parking bay should be provided per wheelchair accessible room.

61 The applicant should provide information explaining how the cinema accommodation will be accessible for disabled people, including wheelchair users. Grouping wheelchair users together in one place (and therefore not providing equality of choice in terms of viewing position) should be avoided, and the applicant should show how they will integrate wheelchair users into the seating provision, in accordance with policy 7.2.

62 It is also recommended, given the extent of commercial development proposed, that the applicant look into the possibility of providing a 'Changing Places' toilet. Further information on these facilities can be found in British Standard BS8300:2009 + A1:2010 12.7. They should, as part of this exercise, look into existing local provision- one may already be provided around the corner, and this is not the type of facility that needs to be provided in every development. However, if there is no local provision, given the uses proposed and that people may spend a considerable amount of time on site i.e. restaurants, shopping, cinema, it is recommended that that applicants investigate the possibility of providing one. Further information can also be found on the Changing Places website: http://www.changing-places.org/

Play space provision

63 Children and young people need free, inclusive and accessible spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan seeks to ensure that all children and young people have access to such provision. The challenge facing boroughs and their partners in play provision will be to find opportunities to retain and increase the provision of play and informal recreation, particularly in housing developments.

64 The proposals set out an intensive mixed-use development and there is a lack of clarity over how recreation and playspace will be accommodated across all age groups. The applicant should consider further how recreation and playspace are to be located within the masterplan and demonstrate a clear strategy in their design & access statement. The applicant should make reference to The Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), which relates to the implementation of London Plan policy 3.6 and provides detailed guidance through benchmark standards

Transport

65 TfL will require a robust Transport Assessment (TA) report to be provided as part of the planning submission in accordance with TfL's 'Transport Assessment Best Practice Guidance' (2010) http://www.tfl.gov.uk/assets/downloads/businessandpartners/transport-assessment-best-practice-guidance.pdf. Depending on the development's impact, TfL may ask for mitigation measures/ s106 contributions towards transport to accommodate the scheme, unless these are adequately addressed as part of the application.

66 It is understood that you entered into pre-application discussions with TfL back in January 2011, however as things have now moved on since then TfL would suggest that a follow up meeting may be beneficial in order to consider the changes to your proposals. Further information on TfL's pre-application advice service can be found on its website http://www.tfl.gov.uk/businessandpartners/15394.aspx

67 The site will also need to be supported by a travel plan in line with TfL's 'A new way to plan' travel planning guidance, http://www.lscp.org.uk/newwaytoplan. TfL would additionally expect a construction logistics plan (CLP) and delivery and servicing plan (DSP) to be produced for the site, and while these documents may ultimately be secured by condition, TfL would expect the TA to include some information on how the impacts are expected to be mitigated, both during the construction phase, and once the development is operational. Full details of how the development is expected to be serviced will also be required, alongside the submission of swept path drawings for the largest vehicles expected to access the site.

68 The TA should also undertake an assessment of key walking routes to and from the site to local amenities such as bus stops and other public transport services, in order to identify if there are any areas in need of improvement, particular consideration should be given to the walking route to South Ruislip station. Access routes through the site for both pedestrians and cyclists should also taken into consideration to ensure they are conveniently located, and designed in such a way to help promote more sustainable modes of travel to the site.

69 Cycle parking will need to be provided in accordance with London Plan standards for each land use, and be in a covered, secure location, overlooked by CCTV where possible. The provision of shower and locker facilities for members of staff wishing to cycle to work is also strongly encouraged. Consideration should also be given to providing visitor parking in the publically accessible parts of the development.

70 The proposed level of car parking should not exceed the maximum London Plan standards, and should be supported by a parking accumulation exercise. It is understood that the car parking is intended to be shared amongst the different land uses proposed on site and while this approach is supported, the applicant should not simply add together the maximum number of parking spaces permitted for each land use in order to come up with total number of spaces proposed on site. Whilst a car parking management plan will ultimately need to be secured for the site by condition, the TA should include some information on how car parking between the different land uses will be managed, and how commuter parking will be prevented. TfL would additionally request that future occupiers of the proposed development be prevented from obtaining on-street residents parking permits for any local controlled parking zone, and that this requirement be secured through the section 106 agreement.

71 As discussed at the meeting, any proposals which involve new traffic signals will need to be fully justified within the TA, and take into account the needs of all road users, including pedestrians and cyclists.

Sustainable energy

72 The applicant should submit an energy strategy in accordance with 'Energy Planning - GLA Guidance on preparing energy assessments (September 2011)'. In particular, projected savings in regulated carbon dioxide emissions as required by London Plan Policy 5.2 should be presented for clarity in the format of Tables 1 & 2 of this guidance document.

73 The energy assessment/strategy should demonstrate how the applicant will meet the requirements of Policy 5.6 of the London Plan. The requirement for connection to existing district heating networks (DHN) or the provision of capacity to connect to planned should be actively

Noise Mitigation & air quality assessment

74 The applicant should be aware that no single aspect apartments should be located in noise category C and D, and if this is the case housing layouts should be modified to create duel aspect units

75 The environmental assessment should include an air quality assessment and development should be air quality neutral.

The Mayor's CIL

76 The applicant should be aware that the Mayor of London CIL was introduced on 1st April 2012 would be applied to the applicant proposals. The rate of CIL for developments in Zone 2 boroughs that include Hillingdon will be £35 per sq.m. of development. The applicant can estimate the future CIL charge by referring to the Greater London Authority website http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy.

77 London boroughs are also able to introduce CIL charges which are payable in addition to the Mayor's CIL. Hillingdon has yet to adopt a scheme. See https://www.hillingdon.gov.uk/article/11145/Hillingdons-Community-Infrastructure-Levy-consultation for more details.'

Conclusion

78 The principle of the redevelopment of the site for mixed-use development is supported but the quantum and location of the retail proposals are not compliant with London Plan strategic planning policy as it fails to comply with the London Plan town centre hierarchy and may have unacceptable impacts on the vitality and viability of existing centres as set out in paragraphs 22 - 27 above. It is therefore suggested that the applicant engage pre-actively with Hillingdon to explore the possibility of altering the centre hierarchy. Should nevertheless the applicant proceed with an application issues relating to retail, housing mix, affordable housing, urban design & housing quality, access, children's playspace, sustainable energy, noise, air quality and transport should be addressed before the application is submitted.

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