HOARE LEA

Hayes Park West.
Hillingdon, London.
Shall Do Hayes Developments Limited.

SUSTAINABILITY
STAGE 2 REPORT – SUSTAINABILITY STATEMENT

REVISION 02 – 22 OCTOBER 2025

STAGE 2

Audit sheet.

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Contents.

Executive summary.

This report provides a summary of the approach to sustainability for the detailed planning application of the Hayes Park West development, hereafter referred to as the 'Proposed Development'.

Development description.

The Proposed Development will consist of the partial demolition and redevelopment of the existing multi-storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works.

Policy and drivers.

A policy review has been undertaken and is outlined in Section 2 of the report. As a summary, planning policy and guidance applicable to the Proposed Development includes:

- National Planning Policy Framework (NPPF) (2024)
- London Plan (2021)
- GLA Energy Assessment Guidance (2022)
- Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
- Hillingdon Local Plan: Part 2 – Development Management Policies (2020)
- Hillingdon Local Plan: Part 2 – Sustainability Appraisal (2014)

Please refer to Appendix A for a direct response to the London Borough of Hillingdon Policies.

Approach to sustainability.

No longer simply ticking boxes, today sustainability is about making real-term impacts. Increasingly, it has become the starting point – and the heart – of ambitious projects. To capture the multi-faceted sustainability benefits and values that the Proposed Development can bring to the Site, local community, surrounding businesses, and future building users, five defined factors – the people, the building, the social network, the natural environment, and the economic aspects – inform the proposed sustainability framework.

The project team has actively engaged with the planning authorities, local community groups and the general public throughout the planning process. Collaboration with the client and project team as well as key stakeholders has helped to inform the strategies for the Proposed Development.

Physical Capital – Building the Future
The Proposed Development's physical capital strategy focuses on reducing whole life carbon emissions by prioritising reuse, low-embodied carbon materials, durability, and recyclability, guided by industry benchmarks and ongoing design improvements. The energy strategy employs a fabric-first approach with improved insulation, air source heat pumps, and mechanical ventilation with cooling to achieve improvements against Building Regulations Part L 2021.

Flood risk is managed through sustainable urban drainage systems including green roofs, permeable paving, and rain gardens, limiting surface water discharge and mitigating pluvial flooding risks. The site benefits from moderate public transport access, enhanced pedestrian and cycling routes, and provides only one car parking space per dwelling with electric vehicle charging and disabled bays, supporting sustainable travel.

The Proposed Development integrates climate resilience, efficient resource use, and sustainable transport to create a durable, low-carbon, and well-connected physical environment.

Social Capital – Placemaking
The Proposed Development enhances social capital through inclusive design, heritage sensitivity, placemaking, and strong connections to nature. It meets accessibility standards with step-free access, wide doors, adaptable interiors, and wheelchair-accessible units with dedicated parking. The design respects nearby Grade II listed buildings, drawing inspiration from their architectural language to create a cohesive sense of place.

Community and recreation are prioritised with private gardens, terraces, balconies; internal communal spaces and extensive external amenity areas, including dedicated play space for young children. The landscape strategy integrates the Proposed Development with surrounding pastoral parkland and mature woodland, offering residents naturalistic play features, generous private gardens, and planting that supports biodiversity. Mature trees are retained and managed, and new planting enhances green connectivity. Hard landscaping materials complement the natural setting, supporting pedestrian and cyclist movement. The Proposed Development achieves an Urban Greening Factor of 0.496, exceeding London Plan requirements, fostering a vibrant, accessible, and nature-connected community.

Economic Capital – Productivity and Growth
The Proposed Development supports economic capital through a strong commitment to sustainable and local procurement. The Applicant will develop a Sustainable Procurement Plan, to ensure procurement decisions prioritise products and services with lower environmental, economic, and social impacts across their supply chains. The strategy promotes responsible practices that enhance the shared environment and build a sustainable economy. The scheme will aim to engage a local workforce, foster local partnerships during construction and operation, and offer apprenticeships to support skills development.

Fair operating practices will be ensured by carefully selecting the Principal Contractor, who must maintain ISO 14001 Environmental Management standards and register with the Considerate Contractor Scheme. While operational practices are not yet finalised, the Proposed Development will adhere to basic UK working conditions and regulations.

Human Capital – Happy and healthy
The Proposed Development emphasises human-centric design by prioritising residents' health, wellbeing, and safety. It incorporates features such as thermal comfort, natural lighting, and access to nature, alongside active transport options including ample cycle parking and improved pedestrian and cycling routes. Comprehensive safety measures based on Secured by Design principles ensure controlled access, CCTV coverage, and strong natural surveillance, creating a secure living environment. Existing traffic calming measures are retained to enhance safety. The Proposed Development complies with relevant building regulations for security and ventilation.

An Air Quality Assessment confirms that vehicle emissions will not negatively impact the site, with the development meeting Air Quality Neutral standards for building emissions and implementing mitigation for traffic emissions. Overall, the design fosters a healthy, secure, and accessible environment that supports residents' wellbeing and aligns with national and local planning policies.

Natural Capital – Embracing Nature
The Proposed Development enhances ecological value, supports climate resilience, and fosters sustainable resource use, consistent with best practices. It prioritises the natural capital by delivering a biodiversity net gain through habitat retention, enhancement, and creation, including native hedgerows and green roofs that support local wildlife. A Preliminary Ecological Assessment identified no significant impacts on nearby protected sites, with mitigation measures planned to protect sensitive habitats during construction.

The design integrates resilient, durable materials and incorporates circular economy principles to reduce waste, reuse existing structures, and ensure resource efficiency. Operational strategies promote waste minimisation and recycling, aligned with local targets. Water consumption reduction is targeted below 105 litres per person per day.

1. Introduction.

This report has been prepared in support of the detailed planning application being submitted by Shall Do Hayes Developments Ltd ('the Applicant') to the London Borough of Hillingdon ('the Council') for the proposed residential development at Hayes Park West, Hayes Park, Uxbridge, UB4 8FE ('the site').

The Sustainability Statement summarises the pertinent regulatory and planning policies applicable to the Proposed Development and sets out how the Proposed Development addresses the relevant policy requirements. For a direct response to the planning policies, please to refer to:

- Appendix A: For an outline response to the Hillingdon Local Policy requirements.
- Appendix B: For a detailed review of relevant London Plan policy requirements.

1.1 Site location and context.

Hayes Park West ('the site') is located within the Charville Ward of the Council, who will be the relevant Local Planning Authority for the application. The site sits within a wider former business park known as 'Hayes Park'.

The Hayes Park estate comprises a historically significant office campus in West London, situated in Hayes, and bounded by a structured, pastoral landscape. The estate is framed by the buildings known as Hayes Park North ('HPN'), Hayes Park Central ('HPC'), and Hayes Park South ('HPS'), both positioned within a broader landscape setting originally envisaged by architect Gordon Bunshaft as a modernist business park set in parkland. HPC and HPS are Grade II* listed due to their architectural and historic interest.

In recent years, the character and context of Hayes Park estate has undergone a fundamental shift from office use to residential, which following a series of planning applications is delivering 188 new homes. The relevant applications are as follows:

- Hayes Park North ('HPN') – a three-storey, early 2000s office building, was granted Prior Approval in 2022 for conversion to 64 homes (Ref: 12853/APP/2021/2202), followed by permission for external enhancements to the building (Ref: 12853/APP/2023/3720). These works are now on-site and being delivered.
- Hayes Park Central ('HPC') and Hayes Park South ('HPS') – both mid-century, listed office buildings, were granted full planning permission and listed building consent in early 2024 for conversion into 124 homes, with associated landscape enhancements (Ref: 12853/APP/2023/1492).

Hayes Park West is bound to the north and west by dense trees planting and open parkland, which is private land owned by the Church Commissioners. To the east the site is bound by HPN, and to the south by the listed HPC and HPS.

The entirety of the site and much of the surrounding land is located within the Green Belt. Beyond that, there are large areas of low-density terraced housing. There is a wide selection of parks and leisure facilities in the area, including the Hayes End Recreation Ground, Park Road Green and the Belmore Playing Fields. The nearest town centres are located at Hillingdon Heath Local Centre, 1.6km to the southwest, and at Uxbridge Road Hayes Minor Centre, 3.3km to the southeast.

The flood risk map for planning identifies that the site is located in Flood Zone 1, and as such has a low probability of flooding.

1.2 Development description.

The Proposed Development will consist of the "Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works." The Proposed Development has evolved through an extensive pre-application and wider stakeholder consultation process, which has included collaborative discussions with the Council, GLA, Historic England ('HE'), and a number of other key stakeholders.

The Proposed Development provides the opportunity to make sustainable use of a redundant, disused car park, and deliver a high-quality residential development that can enhance the setting of the adjacent listed buildings.

The Proposed Development includes the provision of a high proportion of family homes, which is a significant planning benefit that directly addresses the Council's priority housing need.

From the outset, the Applicant has taken a carefully informed design approach, proposing a new building of outstanding architectural quality. The objective has been to enhance the setting of the adjacent listed buildings, providing a contextual architectural response and significantly improving the landscape setting.

The Proposed Development will deliver a range of planning benefits, completing the wider transformation of the Hayes Park estate and this unique new community.

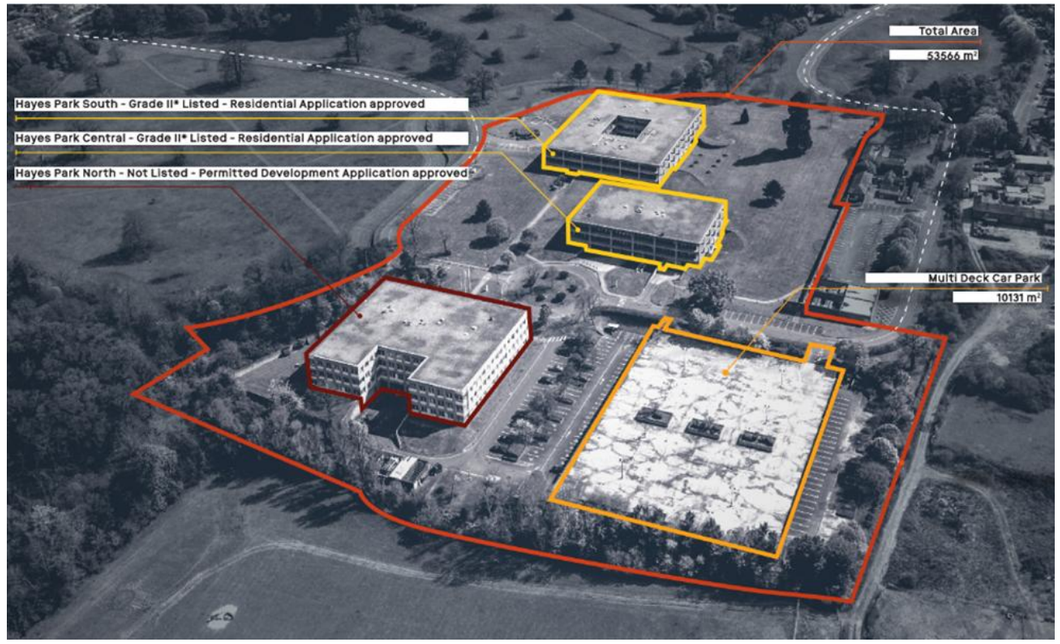

Figure 1 Aerial view of site with surrounding context (Credit: SEW)

Figure 2: Ground floor site plan of the Proposed Development (Credit: SEW)

1.3 Overview of policies and drivers.

A detailed policy review has been undertaken a direct response to LBH policies can be found in Appendix A.

In summary, planning policy documents applicable to the Proposed Development have been identified and include the following:

- National Planning Policy Framework (NPPF) (2024)
- London Plan (2021)
- GLA Energy Assessment Guidance (2022)
- Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
- Hillingdon Local Plan: Part 2 – Development Management Policies (2020)
- Hillingdon Local Plan: Part 2 – Sustainability Appraisal (2014)

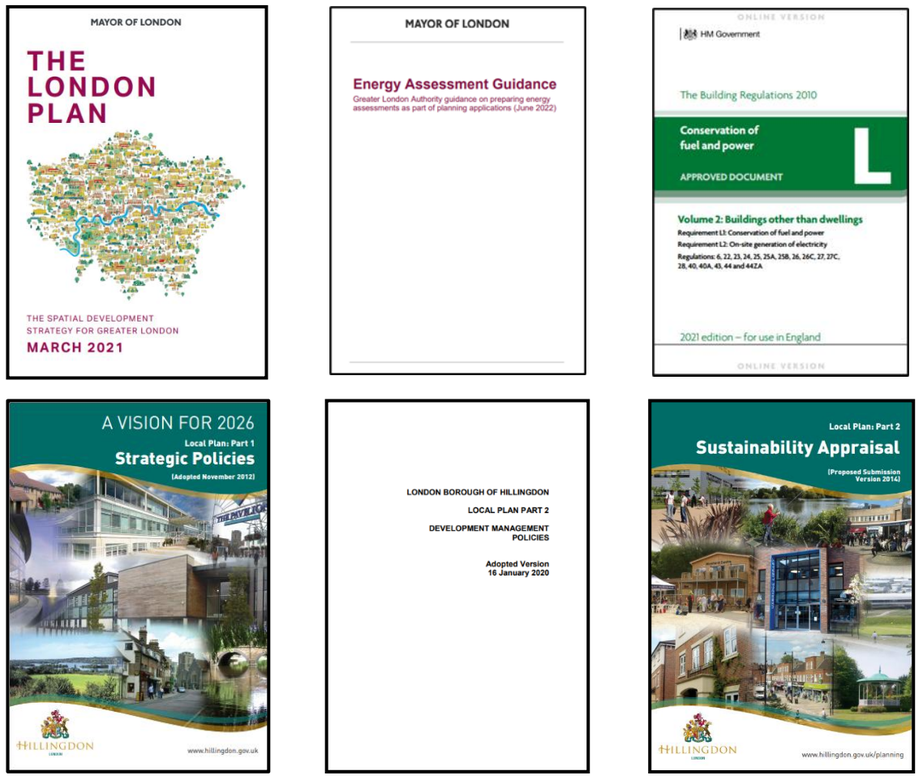

Figure 3: Policy documents reviewed.

2. Approach to sustainability.

The following strategy addresses a wide range of sustainability subject areas and covers various headline sustainability categories. The strategy confirms the applicable policies and the Applicant's aspirations and measures of sustainability that would be implemented at the Proposed Development.

The design of the Proposed Development is based on sustainable design and construction principles as informed by planning requirements and industry best practice. On this basis a sustainability framework has been established based on five defined capitals i.e. the buildings (Physical), the social network (Social), the economic aspects (Economic) and the people (Human) the natural environment (Natural), as illustrated in Figure 4. The aim is to capture the multi-faceted sustainability benefits and values that the Proposed Development could bring to the following areas: the Application Site, local community, surrounding businesses, and future building users/occupants.

Figure 4: Proposed framework for sustainability – Creating value.

Our strategy is based on the concept of realising real term social, economic and environmental benefits to all stakeholders and investors and thereby generating value in the communities we create.

2.1 The delivery framework.

Working with all key stakeholders, an overall vision for the Proposed Development has been defined. Workshops have been held in collaboration with the Applicant and the design team to create a sustainability vision identifying key objectives to be delivered. As described in Table 1, the strategy responds to the five elements of the five capitals framework.

Table 1: Five Capitals

Physical Capital	"Building the future" Creating high quality buildings ensures PHYSICAL VALUE is increased where buildings minimise energy consumption in operation and embeds resilience to the impact of climate change considers functional adaptability within the design.
Social Capital	"Placemaking" By enabling community identity, SOCIAL VALUE is increased where buildings add value to the local community by taking a holistic view on the short- and long-term needs of occupants and the wider community.
Economic Capital	"Productivity and growth" By ensuring equity for all, ECONOMIC VALUE is increased where local workforce and suppliers based within the borough are encouraged. Upskilling and development opportunities for local residents during construction and operation also are implemented to foster local growth.
Human Capital	"Happy and healthy" With a focus on people, HUMAN VALUE is increased through subsequent environmental features such as thermal comfort, air quality and the inclusion of cycle spaces etc to ensure occupant wellness and healthy buildings.
Natural Capital	"Embracing Nature" By seeking to achieve positive gain, NATURAL VALUE is increased where existing quality is protected, and new complementary resources are introduced.

3. Sustainability strategy.

The design of the Proposed Development is based on high sustainability aspirations and is compliant with local policy and industry best practice. The strategy for the Proposed Development addresses key sustainability challenges and opportunities, responds to the requirements of the applicable policies, and implements the Applicant's aspirations.

It embraces the Five Capitals framework, responding to the challenges of climate, biodiversity and health and wellbeing, UN sustainable development goals and the Applicant's vision, with the aim of creating long term value and generating a flow of environmental, social and economic benefits. Each Capital has been contextualised to the specific needs, challenges and opportunities arising from the Proposed Development. The characteristics and strategies of the Proposed Development are discussed under the five themes in the following sections.

3.1 Physical capital – "Building the future".

Whole Life Carbon
The assessment of Whole Life Carbon (WLC) emissions consists of the following sections: embodied carbon emissions; total operational carbon emissions (regulated plus unregulated); and any future potential carbon emissions 'benefits', post end-of-life, including benefits from reuse and recycling of building structure and materials.

An assessment has been undertaken in line with the GLA guidance for undertaking WLC Assessments and therefore in line with the RICS Professional Statement: Whole Life Carbon Assessment for the Built Environment (Version 1). Material considerations have also given priority to WLC, considering the embodied carbon, the maintenance and durability of the material and the ease of reuse or recycling of the material. Further carbon reduction opportunities have been identified to reduce the embodied carbon impact of the Proposed Development's design during further design stages.

The WLC assessment examines the Proposed Development against a range of benchmarks to identify opportunities for further improvements and guide the design team to reduce carbon emissions. Industry standards have been defined for embodied carbon, produced by LETI, RIBA, the GLA and the UK Net Zero Carbon Building Standard (UKNZCBS).

Additionally, the WLC assessment completed for the Proposed Development identifies the most carbon intensive building elements, highlighting any risks in achieving upfront and embodied carbon benchmarks, and provides recommendations to the design team regarding next steps to minimise the Site's carbon emissions.

Please refer to the Whole Life Carbon report [5500043-HLE-XX-XX-RP-ST-602028-P01] for further detail.

Energy Strategy
The energy strategy for the Proposed Development will result in a highly efficient, low-carbon scheme. An Energy Strategy has been prepared in line with the London Plan (2021) and LBH policies. The Proposed Development is required to achieve compliance with Building Regulations Part L 2021. The strategy has been developed using the 'Be Lean, Clean and Green' energy hierarchy which utilises a fabric first approach to maximise reduction in energy through passive design measures. A summary of the features incorporated are provided below:

- Improved fabric performance.
- Air Source Heat Pumps will provide heating and hot water to the residential units
- Mechanical Ventilation with cooling modules will be provided.

Further details can be found within the Energy Strategy [5500043-HLE-XX-XX-RP-ST-402026-P01].

Flood Risk Management
A Flood Risk Assessment and Drainage Strategy has been produced by Whitby Wood for the Proposed Development at Hayes Park West and is submitted alongside the planning application. The assessment confirms that the site is situated within Flood Risk Zone 1, with no significant risk from fluvial or tidal flooding. The flood risk from rivers and seas is low, while the risk from surface water flooding is assessed as medium to high in certain areas due to local topography and site characteristics, including the presence of lower site levels relative to boundaries. Groundwater, sewer, and artificial flood risks are considered low.

The surface water flood risk is addressed through a comprehensive drainage strategy that incorporates sustainable urban drainage systems (SuDS) designed in accordance with CIRIA C753 guidelines. Key components of the drainage strategy include the use of green roofs providing attenuation volume, permeable paving, rain gardens, and landscaped areas designed to manage exceedance flows and reduce runoff rates. The strategy aims to mimic the natural water cycle by attenuating flows, enhancing water quality, and promoting biodiversity and amenity benefits. The proposed surface water discharge rate is limited to 6.8 l/s (QBar) into the existing Thames Water surface water sewer network, with a pre-planning enquiry submitted to Thames Water to confirm discharge arrangements.

Mitigation measures within the Proposed Development include raising ground and finished floor levels to manage flood risk, the use of channel and threshold drains in areas of higher pluvial flood risk, and the design of exceedance flow paths directing excess water into landscaped depressions within the site boundary to prevent flooding of external properties. The strategy confirms no pluvial flooding of the Proposed Development up to the 1 in 100-year storm event plus a 40% allowance for climate change.

Foul water from the Proposed Development will discharge separately into the Thames Water foul sewer system without restriction. The drainage strategy follows the drainage hierarchy, prioritising infiltration where feasible; however, infiltration is not viable on site due to clay soils, and discharge to watercourses is not feasible due to third-party land constraints.

Overall, the strategy aligns with local policy requirements, including the London Plan and LBH's Local Plan, and addresses climate change resilience, long-term maintenance, and biodiversity enhancement.

Sustainable Transport
Overall, the transport assessment and strategy for the Proposed Development support sustainable travel through good public transport access, enhanced facilities for cyclists and pedestrians, and a carefully considered car parking provision aligned with policy.

Public Transport
The site is located in an area with good public transport accessibility, providing opportunities for residents to use modes other than private cars. Although the formal PTAL score for the site is 0 due to the private road access, measuring from the nearest public road access point gives a more realistic PTAL score of 2. The closest railway station is Hayes and Harlington, approximately 4km walking distance, and the nearest underground stations are Hillingdon and Uxbridge, both around 5km away. The Proposed Development will connect to pedestrian networks to the north and south of the site, enhancing access to local public transport services. The site is well-positioned to encourage sustainable travel in line with the Mayor's Transport Strategy and national planning guidance.

Cyclists and Pedestrians
Cycling is promoted as a viable alternative to short car trips, especially those under 5km. The site is within a 20-minute cycle ride of key areas such as Southall, Uxbridge, West Drayton, and parts of Ickenham, providing access to a wide range of amenities and employment opportunities. Pedestrian routes will be improved and connected through the Proposed Development, supporting safe and convenient walking access. The strategy recognises the importance of prioritising walking and cycling as sustainable transport modes, consistent with national and London transport policies. Cycle parking will also be provided, with a minimum of 107 allocated to residents (97) and visitors (10) in line with local standards.

Car Parking

Car parking provision will be in accordance with the London Plan standards based on the site's PTAL rating of 2. A total of 52 car parking spaces will be provided for the 52 residential units, including 12 electric vehicle charging bays and 3 disabled parking bays. This provision reflects a balance between meeting residents' needs and encouraging sustainable transport choices. The car parking strategy supports sustainable development objectives by managing parking demand and promoting alternatives to car use.

3.2 Social capital – "Connecting people".

Inclusive Design and Accessibility

In terms of inclusive design, the scheme will be designed and specified in accordance with the relevant local and national planning guidance. The Proposed Development ensures accessibility by meeting Building Regulations Part M4(2) for all dwellings, with 10% (five units) meeting higher Part M4(3) wheelchair standards. Features include step-free access, wide doors with lever handles, level thresholds, and compliant communal stairs. Interiors provide spacious circulation, adaptable bathrooms with level showers and baths, slip-resistant floors, and reinforced walls for grab rails. Kitchens have adjustable worktops and ample clearance. Wheelchair units include powered door provisions and dedicated storage. Private balconies have level access but limited depth. The Proposed Development provides 3 accessible car parking bays positioned next to the wheelchair accessible homes.

Heritage

Consideration of the neighbouring Grade II listed buildings, HPC and HPS, and their setting has been a key focus of the design development. The design ensures there is minimal harm to the heritage buildings. Elements from the existing buildings have inspired the proposed scheme and been interpreted for the new residential setting. The shared design language creates a sense of place across the masterplan.

Placemaking, Community and Recreation

The Proposed Development is to bring a vibrant, community focused residential development to the site of an existing, disused carpark. The design of the Proposed Development has a strong focus on enabling social interaction and creating a residential community across the masterplan, including private gardens, terraces and balconies, new play spaces, internal communal amenities, and external communal areas. The variety of typologies of residential units is likely to encourage the development of a mixed demographic community, and the design includes many elements aimed at bringing this community together, as well as connecting people with nature.

There will be 49 sqm of internal community amenity. Alongside this will be 1,733 sqm of external community amenity, not including the wider parkland, and 161 sqm play space for ages 0-4 years. As well as the community space, the proposal includes 1,655 sqm of private external amenity, with all dwellings having access to a private space (either a balcony, terrace or garden).

Urban Greening and Connection to Nature

The Proposed Development aims to connect residents with nature through a landscape strategy that responds sensitively to the surrounding natural context—arable land, mature woodland, and pastoral parkland. Inspired by the original vision of setting buildings within pastoral parkland, the design integrates nature in the following ways.

- Retaining parts of the existing car park to create a south-facing podium terrace with gently mounded grassland, wildflower meadows, seating, and meandering paths, offering residents a generous outdoor social space aligned with the pastoral character.
- Designing the residential courtyard and outdoor amenity spaces to visually and ecologically link with the existing mature woodland along the north and west boundaries, incorporating a mix of native broadleaf and coniferous tree species, woodland understory planting, and play areas that celebrate woodland character.
- Providing ground and lower ground level homes with generously sized private gardens, delineated by a combination of low concrete walls and defensible hedgerow planting inspired by the site's heritage hedgerows, creating a consistent natural and secure interface between private and communal spaces.
- Employing a planting strategy with species reflecting the adjacent landscape types, including perennial meadows, mixed woodland species, edible ornamental planting, and defensible hedges to optimise wildlife benefits and amenity value.
- Offering naturalistic, integrated play features for young children within the courtyard, such as timber play structures, stepping logs, and reclaimed materials from site demolition, encouraging imaginative play immersed in nature rather than fenced, prescriptive playgrounds.
- Retaining and managing mature trees, thinning and crown lifting to improve light, and introducing new tree planting to sustain the green belt that screens and encloses the development, strengthening ecological connectivity within the wider Hayes Park masterplan.
- Selecting a palette of hard landscaping materials—bound aggregate, block paving, and natural-looking play surfaces—that complement the pastoral and woodland character, supporting pedestrian, cyclist, and vehicle movement while reinforcing the nature-inspired environment.

Overall, the development fosters a seamless interface between buildings and the natural landscape, inviting residents to engage with and enjoy a richly biodiverse, pastoral, and woodland setting through thoughtfully designed outdoor spaces, private gardens, and communal amenities. Through the provision of the new open, green space and other greening across the site, the Proposed Development will provide an Urban Greening Factor of 0.496 exceeding the requirement in the London Plan Policy G5 for residential developments (of 0.4).

3.3 Economic capital – "New opportunities".

Sustainable and Local Procurement

The Applicant is committed to producing and consuming responsibly and investing in the communities they serve. Key considerations have been made regarding procurement, which will be led by the implementation of a Sustainable Procurement Plan. The aim of the plan will be to ensure that all staff involved in the procurement of goods and services routinely consider how the shared environment can be enhanced and protected, contribute to the health and well-being of society, and build a sustainable economy through the procurement decisions. The Applicant will look to facilitate the selection of products that involve lower levels of negative environmental, economic, and social impact across their supply chain including extraction, processing and manufacture. This strategy not only promotes more economically, socially, and environmentally responsible practices, but also encourages the design and procurement process to identify risks and reduce the environmental, economic and social issues in the supply chain of construction products.

Alongside this, procuring a local workforce will be considered and prioritised, and local partnerships will be sought during the construction phase, and for the operational phase. In the construction phase, apprenticeships will also be offered within the project.

Fair Operating Practices

Prior to the commencement of works on site, the Applicant will take due consideration of the appointment of Principal Contractor, ensuring fair operating practices are implemented throughout the construction process, in line with the guidelines for suppliers set out in the Applicant's Responsible Sourcing Policy. The Principal Contractor will be required to maintain an ISO 14001 EMS standard, as well as ensure the site is registered with Considerate Contractor Scheme upon commencement of work.

At this stage of the design, it is unclear on the proposed operating practices the building will implement in operation. It is understood however, basic working conditions and regulations will be adhered too, as per the UK guidance.

3.4 Human capital – "Happy and healthy".

Human-Centric Design
Human centric design centres on development that puts user needs, desires and abilities at the centre of the design process. Consideration of air quality, acoustics, thermal comfort, access to nature, lighting and active transport have been incorporated into the Proposed Development to promote health and wellbeing for building users.

Measures to encourage physical exercise such as the provision of cycle parking spaces, improved pedestrian and cycles access and recreational spaces have been included.

Safety and Security
As a residential development, the security of residents' homes is important. The Proposed Development integrates comprehensive safety and security measures based on Secured by Design principles. It features controlled access with two main entry points on the southern and western sides of the estate, alongside fob-controlled entry to secure areas such as the car park, bicycle store, bin store, and ancillary communal spaces. Access to plant rooms is restricted to maintenance and refuse personnel. Existing traffic calming measures on estate roads will be retained to enhance safety. All glazing and doors comply with PAS 24:2016 standards, and external and internal CCTV systems will monitor all communal areas, including the under-croft car park, amenity rooms, and communal stairs, with specific locations to be confirmed during detailed design. High-quality locks will secure all private entrances and communal amenity spaces.

The Proposed Development benefits from strong natural surveillance, with residential buildings overlooking the parkland and all façade sides, complemented by appropriate security and public realm lighting at night. Additionally, the scheme complies with Building Regulations Approved Document Q, incorporating secure night-time ventilation through perforated louvres in ground-level rooms. Together, these measures provide a controlled, monitored, and secure environment that prioritizes resident safety and security.

Local Air Quality
An Air Quality Assessment has been produced by NRG Consulting [Hayes Park - Air Quality Assessment – October 2025] and submitted as part of the planning application. The report details the potential air quality impacts associated with the operation of the Proposed Development.

The findings of the assessment are as follows:

- The analysis of vehicle emissions indicates that the predicted concentrations of key pollutants such as PM10 and NO_2 at the modelled receptors fall within APEC Category A. As a result, the impact of vehicle emissions is not considered to be grounds for refusal, and no building mitigation measures are deemed necessary based solely on these emissions
- In addition, the Proposed Development is assessed as Air Quality Neutral (AQN) with respect to building emissions in line with current planning guidance. While the traffic emissions component did not fully meet AQN criteria, appropriate mitigation measures have been identified to ensure that this does not create a constraint for the granting of planning permission.

Based on the information provided in the report, it is considered that air quality should not be viewed as a constraint to planning. The Proposed Development conforms with the principles underpinning the National Planning Policy Framework, the London Plan, and relevant local planning policies.

Further details can be found in the Air Quality Assessment.

3.5 Natural capital – "Positive impact".

Ecology and Biodiversity Net Gain
The Preliminary Ecological Assessment (PEA) for the Proposed Development at Hayes Park West was conducted by Greengage and involved a desk study and a site walkover survey in July 2025. The assessment followed UK Habitat Classification System guidance and CIEEM guidelines to identify protected and priority habitats and species on and around the site.

The site is located near several designated ecological sites, including the South West London Waterbodies Special Protection Area approximately 9 km away, and multiple Local Nature Reserves within 2 km. However, due to distance, urban barriers, and lack of habitat connectivity, significant impacts on these sites are considered unlikely. On-site habitats include a native hedgerow listed as a habitat of principal importance under the NERC Act, which is to be retained but may be vulnerable to construction impacts such as machinery damage or pollution. Adjacent lowland mixed deciduous woodland is also nearby and could be indirectly affected.

Construction phase impacts like dust and pollution will be managed through a Construction Environmental Management Plan (CEMP). The assessment recommends mitigation measures during construction to protect habitats, including careful management of machinery and materials, and provision of communal greenspace to reduce recreational pressure on nearby nature reserves.

The PEA concludes that with appropriate mitigation, the Proposed Development can proceed without significant adverse ecological effects, and opportunities exist for biodiversity enhancement through sensitive design and management. This assessment has informed the development design to ensure ecological considerations are integrated and protected throughout the project lifecycle.

The Proposed Development will result in a net gain in biodiversity units compared to the pre-development baseline, achieved through habitat enhancement, creation, and management measures integrated into the design. The landscape proposals incorporate a range of habitat types that contribute to biodiversity, including native planting, green roofs, and features that support local wildlife. The Proposed Development complies with national and local biodiversity policies by providing measurable biodiversity improvements.

Long-term management and maintenance arrangements are recommended to secure the sustainability of biodiversity enhancements. Overall, the Proposed Development will enhance ecological value on site, providing environmental benefits consistent with planning policy and best practice.

Resilience & Adaptability
All materials will be specified to be of resilient quality suitable for residential use in dwellings and medium to heavy use in communal area, including hardy paints, contract carpet, kickplates, push plates, safety glass (subject to further design detail). This strategy will help mitigate the impact of pedestrian traffic throughout the building.

Climate resilience is being considered within the proposal, and the design team are assessing and designing the building in order to minimise the future need of carrying out works to adapt the building to take account of more extreme weather changes resulting from climate change and changing weather patterns. An overheating study is being conducted to ensure thermal comfort can be achieved now, and in the future.

Circular Economy
The scheme will look to avoid unnecessary material use arising from over specification without compromising structural stability, durability or the service life of the building.

It is assumed 100% of timber and timber-based products used on the project are 'Legal' and 'Sustainable' as per the UK Government's Timber Procurement Policy (TPP). Where considered most practical, and cost effective to the design, materials will be sourced from locally certified suppliers.

The following process has been followed in developing the CE Statement for the development:

- CE principles have been reviewed by the project team, and opportunities have been workshopped and identified, as part of the process of developing the CE Statement and the Sustainability strategy.
- Additional workshops will be held during the detailed design stages to explore further opportunities to incorporate key CE principles into aspects of the detailed design, procurement and construction process.
- As the proposals move toward the construction stage, early engagement will be sought with contractors to assist in refining strategies for delivery.
- Robust data collection plans will be implemented through design and construction to facilitate ongoing monitoring against intended outcomes.

- Given the scale of the development it is expected that the strategies and approach will evolve over time.

The CE principles will be implemented to ensure efficient use of natural resources. Critical measures include:

- A strategy to reduce, reuse and recycle materials minimising demolition, excavation and construction waste generation and achieving 95% diversion from landfill. Demolition/strip-out materials on site will be reused and recycled where feasible, with a predicted 100% diverted from landfill.
- A portion of the existing car park structure is being retained to reduce the new concrete and steel required.
- The pad foundations of the existing car park to be retained and strengthened where feasible.
- Design strategies such as discreet building services, standardised parts, reversible connections, use of a kit of parts and design for ease of access all support adaptability, flexibility, maintainability and disassembly. This can allow new layers and systems to be in use for longer and support circularity at end-of-life.
- On site environmental data during the construction phase will be collated, reviewed and verified to promote transparency and accountability. Upon project completion, the Applicant will disclose the waste arisings from the development.
- The façade and landscape will be designed with robust materials for longevity and easy maintenance.
- Specification of reused materials and/or materials with recycled content.
- Operational waste management has been considered to enable separation and recycling of municipal waste, in line with the GLA target of minimum 65% recycling rate by 2030.

Please refer to the Circular Economy Statement [5500043-HLE-XX-XX-RP-ST-602031-P01] for more detailed information on resource efficiency.

Operational Waste Management
The Operational Waste Management Strategy for the Proposed Development, developed by Iceni Projects, adopts a waste hierarchy approach consistent with local council requirements. Each dwelling will be provided with a three-compartment waste bin to facilitate easy sorting of waste streams by residents, supported by guidance in the home user manual. Communal waste stores will contain separate 1,110 litre Eurobins for refuse and dry recyclables, and 240 litre wheeled bins for organic waste, located conveniently for resident access and waste collection. The Proposed Development is expected to generate approximately 10,760 litres of residential waste per week.

Additional measures under consideration include consolidated waste collection aligned with surrounding areas to reduce refuse vehicle movements, use of smart bin technology to optimise collection frequency and routes, and community-led waste minimisation schemes such as repair and reuse initiatives. Waste management will be monitored by estate management to ensure effectiveness and compliance. The strategy aligns with the GLA and local authority targets, aiming to promote waste minimisation, recycling, and reuse throughout the operation of the Proposed Development.

Water Consumption
The Proposed Development aims to reduce water consumption and meet a target of less than 105 litres/person/day. As the design develops this will be a factor for design decisions, including selection of plumbing fixtures.

4. Conclusion.

This report presents the Sustainability Strategy for the Proposed Development which has been informed by national and local policy requirements, the Applicant's vision and sustainable design and development guidance and frameworks including, but not limited to:

- National Planning Policy Framework (NPPF) (2024)
- London Plan (2021)
- GLA Energy Assessment Guidance (2022)
- Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
- Hillingdon Local Plan: Part 2 – Development Management Policies (2020)

To capture the multi-faceted sustainability benefits and values that the Proposed Development can bring to the Site, local community, surrounding businesses, and future building users, five defined factors – the people, the building, the social network, the natural environment, and the economic aspects – inform our proposed sustainability framework. The Proposed Development complies with local and national policy and will achieve exemplar sustainability. These are summarised below.

Physical Capital	"Building the future" - Whole life carbon - Energy strategy - Flood risk management - Sustainable transport
Social Capital	"Connecting people" - Inclusive design and accessibility - Heritage - Placemaking, community and recreation - Urban greening and connection to nature
Economic Capital	"New opportunities" - Sustainable and local procurement - Fair operating practices
Human Capital	"Happy and healthy" - Human-centric design - Safety and security - Local air quality
Natural Capital	"Positive impact" - Ecology and Biodiversity Net Gain - Resilience and adaptability - Circular Economy - Operational waste management - Water consumption

Appendix A – Direct response to Hillingdon policies.

Strategic policies.

Policy	Compliance
Policy EM1: Climate Change Adaptation and Mitigation	
Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.	The proposed site is located a short distance from local and town centres, and although it is unlikely to be classed as 'high density', it creates a significant number of dwellings on a previously developed site. The development proposal would aim to encourage sustainable transport, through offering only one car parking space per dwelling, 12 of which provide EV charging, encouraging active transport through improved pedestrian space and cycle access and facilities, and it is also located within walking distance of bus stops.
Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.	The development will provide bike storage in line with TfL requirements, and provide increased cycle and pedestrian access, and there are bus stops within walking distance. The car parking allowance of 1 space per dwelling is lower than LBH maximum requirement.
Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.	A high quality and considered design approach has been taken with the proposal, aiming to ensure the proposal is sympathetic to the heritage buildings on the site, whilst ensuring the residences will be well designed to suit the needs of residents, both now and in the future.
Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.	The proposal is for the redevelopment of previously developed land to deliver housing.
Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.	The Proposed Development aims to be fossil fuel free, with an Energy Strategy that includes individual ASHP and PV provision on roof. Please see the Energy Strategy and AQA for further details on the project's approach. Decentralised energy approach has been deemed not feasible for the scheme due to the site layout, as all dwellings are independently accessed, with no communal corridors or risers. Therefore, the scheme is not suited to a communal heating system as distribution across the building would require underground distribution pipework that would be challenging to install and maintain. This would require additional excavation works, contrary to the proposed retention of the existing foundations to reduce embodied carbon and promote circular economy. It is proposed for each dwelling to have its own ASHP. This also allows for the dwellings to be sold and operated by the homeowner independently.
Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.	The site is within an AQMA. The proposal removes a current carpark. The development will incorporate LZC technology, including ASHP and PV panels. The refrigerant choice will be carefully considered and leakage minimised to reduce pollution. Please see the Energy Strategy and AQA for further details on the project's approach. Also, increased vegetation within the landscaping will aid with improving air quality and sequestering carbon.
Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.	The land is not deemed to be in need of remediation.
Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.	The Energy Strategy includes PV provision for each individual dwelling for all units with roof space. Additional PV will be provided to serve the internal communal amenity space. The London Plan carbon reduction targets for residential development should be exceeded, based on the Stage 2 calculations. Please see the Energy Strategy for details.
Promoting new development to contribute to the upgrading of existing housing stock where appropriate.	Although not previously housing, this proposal is for the redevelopment of an existing carpark site to create new housing stock.
The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:	
Locating and designing development to minimise the probability and impacts of flooding.	The site is located within Flood Zone 1. The proposed improvements to the landscaping, including SUDs, should reduce the probability and impact of pluvial flooding.
Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.	Water consumption targeted to be less than 105L/person/day as required by GLA guidance and Hillingdon policy. Surface water drainage and flood risk will be improved by landscaping changes and SUDs.
Giving preference to development of previously developed land to avoid the loss of further green areas.	The proposal is on previously developed land, with green areas and landscaping being enhanced. There will be some changes to hard landscaping to improve access and benefit residents.
Promoting the use of living walls and roofs, alongside sustainable forms of drainage to	Green roofs are proposed. There will be significant increase in vegetation and biodiversity across the rest of the site due to the landscaping improvements.

Policy	Compliance
manage surface water run-off and increase the amount of carbon sinks.	
Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.	Highly efficient building fabric is proposed throughout the development. Overheating studies have been conducted for current and future climate scenarios to ensure thermal comfort for occupants. The glazing ratios have been optimised and external blinds introduced for some spaces. Refer to the Energy Strategy.
Policy EM7: Biodiversity and Geological Conservation	
Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:	
The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.	The PEA acknowledges the presence of multiple Sites of Importance for Nature Conservation (SINCs) within 2 km of the site, including sites of Borough Grade II importance such as the Hayes Shrub SINC. The assessment concludes that, with the implementation of appropriate mitigation measures—such as dust and pollution control during construction secured through a CEMP — there will be no adverse impacts or loss to these SINCs. Sites of Metropolitan and Borough Grade 1 importance lie beyond the immediate vicinity and are protected from any direct or indirect effects by existing urban barriers and careful site management. The development thus aligns with policy requirements to protect and enhance SINCs, ensuring no detrimental effects on these valuable ecological assets. Please see PEA for details on the project's approach to compliance.
The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.	The PEA identified the presence of habitats of principal importance, including a native hedgerow on site and nearby lowland mixed deciduous woodland, both of which will be retained and safeguarded through appropriate mitigation measures during construction. The development design incorporates habitat enhancement and management strategies to support local biodiversity, ensuring compliance with relevant biodiversity action plans. Furthermore, the PEA recommends the implementation of a CEMP to mitigate potential impacts on species and habitats, thereby promoting their conservation and enhancement in line with national and local biodiversity policies. Please see PEA for details on the project's approach to compliance.
Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.	The site is adjacent to an area designated as a Nature Conservation Site of Borough Grade II or Local Importance (Hayes Shrub). The PEA considered this site and other nearby sites of ecological importance and makes recommendations to offer improvements for the local ecology. Please see PEA for details on the project's approach to compliance.
The provision of biodiversity improvements from all development, where feasible.	The proposed landscaping plan is predicted to provide a BNG exceeding 10%, in line with the Environment Act 2021. Please see BIA for details.
The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.	Green roofs are proposed within the development.
The use of sustainable drainage systems that promote ecological connectivity and natural habitats.	Surface water drainage and flood risk will be improved by landscaping changes and SUDs. There will be significant increase in vegetation and biodiversity across the site due to the landscaping improvements.
Policy EM11 – Sustainable Waste Management	
The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.	A Circular Economy Statement has been developed, and as part of this site and operational waste have been addressed. Please see CES for details on the project's approach.
The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures such as bioremediation of soils and best practice in building construction. The Council will promote using waste as a resource and encouraging the re-use of materials and recycling. The Council will also support opportunities for energy recovery from waste and composting where appropriate. The Council will safeguard existing waste sites unless compensatory provision can be made	A Circular Economy Statement has been developed and addresses strategies to encourage reuse and recycling of materials onsite and offsite, both in the initial demolition and construction, and throughout the building life cycle. Please see CES for details on the project's approach.

Development management policies.

Policy	Compliance
Policy DMHB 4: Conservation Areas	
New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will	
a. Require proposals for new development, including any signage or advertisement, to be of a high-quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.	Refer to comments in Strategic Policies above. Please see PEA for details on the project's approach to compliance.
b. Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.	Refer to comments in Strategic Policies above. Please see PEA for details on the project's approach to compliance.
c. Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans.	Refer to comments in Strategic Policies above. Please see PEA for details on the project's approach to compliance.
Policy DMHB 14: Trees and Landscaping	
a. All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.	As demonstrated in the landscape proposals, the proposal for Hayes Park aims to retain the existing green space and increase the biodiversity within it.
b. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.	The Proposed Development includes a comprehensive landscape scheme that integrates both hard and soft landscaping elements designed to complement the character of the local area. The landscaping proposals have been developed with a focus on supporting and enhancing biodiversity, incorporating native planting, green roofs, and habitat features that contribute to ecological connectivity and species diversity. Additionally, the scheme provides amenity benefits through the creation of communal green spaces that encourage resident engagement with the natural environment.
c. Where space for ground level planting is limited, such as high-rise buildings, the inclusion of living walls and roofs will be expected where feasible.	There is significant space for ground level planting, and the landscaping proposal includes this within the terraces around the edge of the building, outside the building entrances, within the central courtyard and play areas. Green roofs have also been incorporated into the proposal.
d. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.	The landscaping plan intends to retain all but 3 of the many existing trees on site, as well as introducing many more of various sizes and species.
Policy DMEI 1: Living Walls and Roofs and on-site Vegetation	
All development proposals are required to comply with the following:	
i. All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and	Green roofs have been incorporated into the proposal. There will be significant increase in vegetation and biodiversity across the site due to the landscaping improvements.
ii. Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.	The site is within the Heathrow AQMA. Green roofs have been incorporated into the proposal. The extensive existing planting and further proposed greening on site should ensure the development is overall air quality neutral with respect to building emissions.
Policy DMEI 2: Reducing Carbon Emissions	
a. All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.	The development has a target to be Net Zero Carbon. To achieve this, the proposal is seeking to reduce demand through energy efficiency measures, fabric energy efficiency, incorporating low carbon heating technology and inclusion PV panels on the roof.
b. All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved.	Hoare Lea have developed a separate Energy Statement detailing the energy assessment.
c. Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.	Initial energy modelling calculations show the proposal meets the GLA requirements for reduction over the notional building for Be Lean, Be Clean and Be Green. Please see the Energy Strategy for details on the project's approach to compliance.
Policy DMEI 3: Decentralised Energy	
a. All major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN).	The nearest DEN is over 2km away, with no future proposals in place for the area. Therefore,

Policy	Compliance
	it is not expected that the scheme would have the opportunity to connect to a DEN. The Proposed Development consists of individual dwellings without any communal corridors or risers. Therefore, the scheme is not suited to a communal heating system as distribution across the building would require underground distribution pipework that would be challenging to install and maintain. This would require additional excavation works, contrary to the proposed retention of the existing foundations to reduce embodied carbon and promote circular economy. It is proposed for each dwelling to have its own ASHP. This also allows for the dwellings to be sold and operated by the homeowner independently.
b. Major developments located within 500 metres of an existing DEN, and minor new-build developments located within 100 metres, will be required to connect to that network, including provision of the means to connect to that network and a reasonable financial contribution to the16onection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible.	The nearest DEN is over 2km away, therefore this does not apply.
c. Major developments located within 500 metres of a planned future DEN, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be required to provide a means to connect to that network and developers shall provide a reasonable financial contribution for the future cost of connection and a commitment to connect via a legal agreement or contract, unless a feasibility assessment demonstrates that connection is not reasonably possible.	The nearest DEN is over 2km away, therefore this does not apply.
Policy DMEI 7: Biodiversity Protection and Enhancement	
a. The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.	Please refer to the PEA, Biodiversity Report and Landscape design for details.
b. If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.	A PEA has been carried out by Greengage and is being submitted in support of the planning application. It is predicted that the development could result in a BNG exceeding 10%. The proposal aims to reduce the maintenance requirements of the landscaping, and a management plan will be implemented to ensure that benefits are realised.
c. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.	The PEA and Biodiversity report indicate that the Proposed Development will not result in significant harm to biodiversity but will in fact offer a BNG exceeding 10%.
Policy DMEI 10: Water Management, Efficiency and Quality	
a. Rain Gardens and non-householder development should be designed to reduce surface water run-off rates to Greenfield run-off rates.	Surface water drainage and flood risk will be improved by landscaping changes and SUDs. There will be significant increase in vegetation and biodiversity across the rest of the site due to the landscaping improvements. Refer to the Drainage Strategy.
b. Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.	Refer to the Drainage Strategy.
c. Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.	Refer to the Drainage Strategy.
d. Developments should be drained by a SuDs system and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the SuDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon. Major development should adopt a 'treatment train' approach where water flows through different SuDS to ensure resilience in the system.	Refer to the Drainage Strategy.
<u>Water efficiency</u>	
e. All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rainwater and grey water.	Water efficiency measures will be incorporate in the systems and fittings to ensure the target of less than 105L/person/day of water is met.
f. All new residential development should demonstrate water usage rates of no more than 105 litres/person/day.	The project has a target to achieve water consumption of less than 105L/person/day. This target will guide design decisions as the design progresses.

Policy	Compliance
g. It is expected that major development proposals will provide an integrated approach to surface water run-off attenuation, water collection, recycling and reuse.	This development meets the major development criteria.
Policy DMEI 14: Air Quality	
a. Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.	Please see the AQA for details on the project's approach to compliance.
b. Development proposals should, as a minimum:	
i. be at least "air quality neutral";	The AQA has been conducted, and the development is deemed Air Quality Neutral.
ii. include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and	The scheme falls under APEC "A" classification and no mitigation measures are required to achieve compliance. However, mitigation will be provided through provision of charging for EVs.
iii. actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.	The landscape interventions are likely to lead to improvement of Air Quality over what has been assessed.
Policy DMIN 4: Re-use and Recycling of Aggregates	
a. The Council will promote the recycling of construction, demolition and excavation waste.	A CES has been developed, and to enable this a pre-demolition audit was conducted by WPS Consulting. This audit indicated the potential level of recycling and reuse of the waste predicted from the development, and how 95% diversion from landfill in line with the GLA target can be achieved.
b. All developments will be encouraged to:	
i. recycle and re-use construction, demolition and excavation waste as aggregates;	Please see the CES for details on the project's approach to compliance.
ii. process and re-use the recyclable material on-site, and where this is not possible, the material should be re-used at another site or for land restoration; and	Please see the CES for details on the project's approach to compliance.
iii. use substitute or recycled materials in new development in place of primary minerals.	Please see the CES for details on the project's approach to compliance.

Appendix B – London Plan Policy review.

London Plan (March 2021).

Policy G5 – Urban greening
Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2 but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2

Policy G6 – Biodiversity and access to nature
Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in developing Development Plans, should:

- use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
- identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
- support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
- seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- avoid damaging the significant ecological features of the site
- minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
- deliver off-site compensation of better biodiversity value.

Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Proposals which reduce deficiencies in access to nature should be considered positively.

Policy SI 1 – Air quality
Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.

To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:

- Development proposals should not:
  - lead to further deterioration of existing poor air quality
  - create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
  - create unacceptable risk of high levels of exposure to poor air quality.
- In order to meet the requirements in Part 1, as a minimum:
  - development proposals must be at least Air Quality Neutral
  - development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retrofitted mitigation measures
  - major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
  - development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

- how proposals have considered ways to maximise benefits to local air quality, and
- what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.

In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

Policy SI 2 – Minimising greenhouse gas emissions
- Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
  - Be Lean: use less energy and manage demand during operation
  - Be Clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - Be Green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - Be Seen: monitor, verify and report on energy performance.
- Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
  - through a cash in lieu contribution to the borough's carbon offset fund, or
  - off-site provided that an alternative proposal is identified, and delivery is certain.

- Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.
- Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life Cycle Carbon Assessment and demonstrate actions taken to reduce life cycle carbon emissions.

Policy SI 3 – Energy infrastructure

- Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.
- Energy masterplans should be developed for large-scale development locations (such as those outlined in Part A and other opportunities) which establish the most effective energy supply options. Energy masterplans should identify:
  - major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
  - heat loads from existing buildings that can be connected to future phases of a heat network
  - major heat supply plant including opportunities to utilise heat from energy from waste plants
  - secondary heat sources, including both environmental and waste heat
  - opportunities for low and ambient temperature heat networks
  - possible land for energy centres and/or energy storage
  - possible heating and cooling network routes
  - opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
  - infrastructure and land requirements for electricity and gas supplies
  - implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector
  - opportunities to maximise renewable electricity generation and incorporate demand-side response measures.
- Development Plans should:
  - identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure
  - identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.
- Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:
  - the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
    - connect to local existing or planned heat networks
    - use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
    - use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
    - use ultra-low NOx gas boilers
  - CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
  - where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.
- Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.

Policy SI 4 – Managing Heat Risk

- Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
  - reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure
  - minimise internal heat generation through energy efficient design
  - manage the heat within the building through exposed internal thermal mass and high ceilings
  - provide passive ventilation
  - provide mechanical ventilation
  - provide active cooling systems.

Policy SI 5 – Water infrastructure

In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.

Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.

Development proposals should:

- through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
- achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development)
- incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise futureproofing.

In terms of water quality, Development Plans should:

- promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans
- support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.

Development proposals should:

- seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
- take action to minimise the potential for misconnections between foul and surface water networks.

Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.

Policy SI 6 – Digital connectivity infrastructure
To ensure London's global competitiveness now and in the future, development proposals should:

- ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users
- meet expected demand for mobile connectivity generated by the development
- take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
- support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

Policy SI 7 – Reducing waste and supporting the circular economy
Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

- promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
- encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products
- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
  - construction and demolition – 95 per cent reuse/recycling/recovery
  - excavation – 95 per cent beneficial use
- design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- how all materials arising from demolition and remediation works will be re-used and/or recycled
- how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- opportunities for managing as much waste as possible on site
- adequate and easily accessible storage space and collection systems to support recycling and re-use
- how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- how performance will be monitored and reported.

Development Plans that apply circular economy principles and set local lower thresholds for the application of Circular Economy Statements for development proposals are supported.

Policy SI 8 – Waste capacity and net waste self sufficiency
In order to manage London's waste sustainably:

- the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
- existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)
- the waste management capacity of existing sites should be optimised
- new waste management sites should be provided where required
- environmental, social and economic benefits from waste and secondary materials management should be created.

Development Plans should:

- plan for identified waste needs
- identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum's of waste will be managed
- allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 - boroughs are encouraged to collaborate by pooling their apportionment requirements
- identify the following as suitable locations to manage borough waste apportionments:
  - existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity
  - Strategic Industrial Locations and Locally Significant Industrial Sites
  - safeguarded wharves with an existing or future potential for waste and secondary material management.

Mayoral Development Corporations must cooperate with host boroughs to meet identified waste needs.

Development proposals for materials and waste management sites are encouraged where they:

- deliver a range of complementary waste management and secondary material processing facilities on a single site
- support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets
- contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste, and/or
- are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI 3 Energy Infrastructure Part D1c)

Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:

- the nature of the activity, its scale and location
- effective implementation of the waste hierarchy and its contribution to London's circular economy
- achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings – all facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO_2 equivalent per kilowatt hour of electricity produced
- the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed
- the transport and environmental impacts of all vehicle movements related to the proposal - the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported

When planning for new waste sites or to increase the capacity at existing sites the following should be considered:

- job creation and social value benefits, including skills, training and apprenticeship opportunities
- local need
- accessibility of services for local communities and businesses.

Policy SI 12 – Flood risk management

Current and expected flood risk from all sources (as defined in paragraph 9.12.2) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.

Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.

Policy SI 13 – Sustainable drainage

Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.

Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

- rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
- rainwater infiltration to ground at or close to source
- rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
- rainwater discharge direct to a watercourse (unless not appropriate)
- controlled rainwater discharge to a surface water sewer or drain
- controlled rainwater discharge to a combined sewer.

Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.

Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

Policy T4 – Assessing and mitigating transport impacts

Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.

When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.

The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

Development proposals should not increase road danger.

Policy T5 – Cycling

Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:

- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
- securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.

Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.

Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-streetcar parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.

Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently located, on-street parking facilities such as bicycle hangers.

Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

Policy T7 – Deliveries, servicing and construction

Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.

Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight strategies. These should seek to:

- reduce freight trips to, from and within these areas
- coordinate the provision of infrastructure and facilities to manage freight at an area-wide level
- reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.

Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:

- Planning history, environmental impact and its relationship to surrounding land use context – recognising that the Agent of Change principle will apply
- Location, proximity to the strategic road network and existing/potential markets
- The existing and potential contribution the railhead can make towards catering for freight movements by non-road modes
- The location and availability of capacity at alternate railheads, in light of current and projected capacity and market demands.

Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.

Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London's strategic road networks and:

- reduce road danger, noise and emissions from freight trips
- enable sustainable last-mile movements, including by cycle and electric vehicle
- deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services).

Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.

Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.

During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

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