



Aggregate Recycling Plant,
Asphalt Production Plant and
Gully Waste Recycling Plant,
Hayes, Bulls Bridge

Townscape and Visual
Impact Assessment

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Executive Summary

ENVIRON UK Limited (ENVIRON) was commissioned by FM Conway Ltd. ('the Applicant'), to produce a Townscape and Visual Impact Assessment (TVIA) for the redevelopment proposals at the former Powergen site ('the Site'), Bulls Bridge, Hayes. The Applicant proposes to redevelop the Site into an Aggregate Recycling Plant, Asphalt Production Plant, and Gully Waste Recycling Plant ('the Proposed Development'). Accordingly the Applicant intends to submit a detailed planning application to the London Borough of Hillingdon (LBH).

The TVIA considers the potential for the Proposed Development to affect the townscape character and visual amenity of the Site and its immediate surroundings, as well as the capacity of identified sensitive receptors to accommodate the proposed change.

The assessment methodology is based on best practice guidance provided in the 'Guidelines for Landscape and Visual Impact Assessment'.

The assessment reviews the relevant policy context in relation to townscape and visual amenity, and explains the assessment methodology. It then describes the current baseline conditions at the Site and its surrounds; identifies potential impacts; discusses the mitigation measures integral to the development proposals that would reduce or offset the magnitude of potential impacts; and finally, assesses the significance of residual effects. Consideration is given to direct and indirect impacts, as well as cumulative impacts during the construction works and once the development has been completed.

Direct effects are those that may affect the existing character and visual amenity of the Site, whereas indirect effects are those that may affect the character, setting and visual amenity of surrounding local character areas (LCAs), heritage features (listed buildings, conservation areas) and protected views. Direct effects on heritage features are considered separately within a Heritage Impact Assessment prepared by First Plan.

Accurate Visual Representations (AVRs) have been used as the principal means to consider the likely townscape and visual impacts and effects of the Proposed Development. The AVRs locate the Proposed Development in its existing physical and spatial context and illustrate the changes (in scope, scale and character) that would take place through comparison of the existing baseline and Proposed Development views of the Site.

In consultation with London Borough Hillingdon, six baseline viewpoints were selected for AVR production and assessment purposes. AVRs were prepared for each view, showing baseline conditions, the Proposed Development, as well as cumulative developments.

The Site itself comprises vacant, derelict land which in its existing state, offers little that is positive to the local townscape and views within the local area. The only exception to this is the woodland on the eastern Site boundary which provides the only structural, coherent and placemaking element on the Site whilst also creating an attractive landscape and visual screen to heritage features in close proximity.

The surrounding townscape context of the Site comprises a mix of industrial features, vacant land, open space, transport infrastructure and canals, with residential development on the periphery of the study area.

Apart from the Bulls Bridge Conservation Area ('CA'), the Canalside CA and the Grade II listed Bulls Bridge, there are no other heritage features located in close proximity to the Site. The setting of these heritage features is of an industrial nature, with the majority of industrial estates

dated and of poor townscape and architectural quality. In urban design terms, the existing setting lacks strong and coherent built and landscape form and lacks a distinct sense of place.

There are no landscape designations covering the Site and the Site is not located within the Metropolitan Green Belt. However, to the north of the Site is the 36 ha Minet Country Park which is a 'Green Flag' Open Space and form part of the Greenbelt. In addition the Yeading Brook and the Grand Union Canal forms part of the UDP's Green Chain Network.

Three sites of nature conservation importance are located in close proximity to the Site:

- The London's Canals Site of Metropolitan Importance for Nature Conservation (SMINC), which includes the entire Grand Union Canal and the Paddington branch;
- The Crane Corridor SMINC, which follows the River Crane; and
- The Yeading Brook, Minet Country Park and Hitherbroom Park Site of Borough Grade I Importance for Nature Conservation (SBINC), which comprises approximately 68 hectares of grassland.

Visibility into and out of the Site is restricted to the immediate surrounding uses due to the:

- existing on-site perimeter bund;
- Site's spatial and visually containment within a 'bowl' defined by a raised railway embankment and dense woodland to the north, woodland and industrial development to the east, industrial development to the south and industrial development to the west together with the raised A312; and
- predominantly flat topography of the study area and lack of summits which limits opportunities for views.

The Site both contributes to the amenity of some views, and detracts from the amenity of others. Its derelict and wasteland condition detracts from the amenity of the immediate surroundings whilst its woodland trees on the eastern boundary re-inforces the woodland within the Bulls Bridge Conservation Area to create an attractive visual screen and sense of enclosure to the canal.

The Proposed Development's layout and elevational treatments have been derived as a result of a detailed design process, taking into account:

- existing site constraints and opportunities;
- the Applicant's brief and operational requirements for the Site;
- advice from LBH, the GLA and other consultees; and
- prevailing planning policy.

Design refinements to ensure the Proposed Development's best possible environmental fit and performance have included the:

- set back of the eastern boundary to safeguard the woodland on the eastern Site boundary;
- provision of enclosures around potentially dusty and noisy activities;
- installation of filter systems to minimise the potential for visible smoke ;
- re-arrangement of internal plant to minimise the height and massing of structures;
- specification of high quality materials with consistent and appropriate colour palette across the Site; and
- appropriate landscaping and biodiversity enhancement features.

In addition to the above, a number of standard management and control measures will be adopted during the implementation and operation of the development to minimise the potential for adverse impacts.

During the construction phase potential temporary impacts are likely to result from two sources: construction activities and associated features; and the permanent loss of existing vegetation within the Site. As the build-out of the scheme progresses, the temporary nature of construction features will make way for the final built form. Scaffolding, cranes and hoarding will be replaced by completed buildings, plant, internal circulation routes and landscaping. Taking into consideration the mitigation measures that will be implemented at the Site, the magnitude of these impacts is likely to be low to medium in close- and medium-distance views of the Site. The magnitude of the impacts on long-distance views will be low because of limited perceptibility at such distant locations and the screening influence of intervening vegetation and built form.

The re-spread of the existing perimeter bund material across the Site is likely to result in direct temporary Negligible to Minor Adverse effects on the Site's landcover and topography. The effect on the woodland trees will be Negligible, given that the Site's eastern boundary will be set back outside the root protection zone of the woodland trees to ensure that they are retained and safeguarded.

Indirect effects on the setting of heritage features, landscape designations and nature conservation areas within the surroundings will be limited by virtue of the screening afforded by existing woodland (to the north and east) and by proposed timber hoarding and/or boundary walls that will be in place. The residual effect on close distance receptors will be temporary Negligible Adverse in all instances, whilst receptors further afield will not be affected. The only exception to this will be temporary Negligible to Minor Adverse effects on the setting of Bulls Bridge and the London Canals SMINC.

The magnitude of the potential construction impacts is likely to be low to medium at LCAs in close proximity to the Site, and low further distant. Considering the sensitivity of townscape receptors, the assessment has concluded that the residual temporary construction effects on townscape character will be:

- None to Negligible at the Industrial Warehouse, Commercial/Retail Warehouse, Transport Corridor, Contemporary/Recent Residential; Established Residential/Community Use and Derelict/Vacant Land LCAs;
- temporary Negligible to Minor Adverse at medium value and sensitive Open Space and Canal System LCAs.

The assessment has concluded that the residual construction effects on visual amenity will be:

- temporary Minor to Moderate Adverse on residents of North Hyde Gardens (due to construction movements) and recreational users of the canal towpath; and
- None to Negligible on users of Minet Country Park, workers at the surrounding industrial units and motorists.

Once completed, potential impacts is likely to result from how the development pattern of the Site is changed; how the new built form fits within the receiving environment; how it is experienced and used by people; and how it is viewed.

The Proposed Development would replace what is currently vacant and unattractive derelict land with a new industrial development of demonstrable quality. The residual direct effect on the character of the Site will be Minor Beneficial.

The greatest potential for indirect completed development impacts on the setting of heritage features, landscape designations and conservation areas will be limited to receptors in close proximity. These include Bulls Bridge, the Bulls Bridge CA, the Canalside CA, the Open Space LCA, the Canal System LCA and the London Canals SMINC. The value of and the sensitivity of these receptors' settings are already adversely affected by existing poor aesthetic quality warehouse and industrial buildings.

The Proposed Development will introduce a range of plant and buildings generally consistent with the height of prevailing industrial development and arranged on-site to maximise separation and set back distances from sensitive receptors. The only exception to this will be the height of the Asphalt Production Plant enclosure, which is dictated by internal plant requirements. Through design review, the height of this element of the Proposed Development has been reduced to the minimum possible.

The new built footprint of the Development will replace the current derelict site condition with industrial and urban features. It will safeguard the existing woodland and enhance open space and landscape provisioning on the communal boundary. The quality and appropriate fit of the development will be further augmented by the adoption of a consistent material and colour palette, landscaping and biodiversity enhancement.

Whilst it is acknowledged that the height of the Asphalt Production Plant, will have an impact on the settings of sensitive receptors by virtue of its visibility (from some locations), the scheme as a whole represents a high quality intervention and will deliver significant enhancement of the Site. Accordingly, the assessment has concluded that the Proposed Development will have both adverse and beneficial impacts and effects on the setting of these receptors, which can be described as follows:

- No residual effect on the setting of the Green Belt;
- None to Negligible residual effects on the settings of low value, less sensitive or more remote LCAs namely the Industrial Warehouse, Commercial/Retail Warehouse, Transport Corridor, Contemporary/Recent Residential; Established Residential/ Community Use and Derelict/Vacant Land LCAs;
- Negligible residual effects on the setting of the Canalside CA across its entire length within the Study Area and on the setting of the Yeading Brook, Minet Country Park and Hitherbrook SBINC;
- Negligible - Minor Neutral residual effects on the setting of the London Canals SMINC, and the medium value Open Space and Canal System LCAs; and
- Minor Neutral effects on the setting of the Bulls Bridge and the Bulls Bridge CA (when visible during the winter months).

The AVR demonstrates that in respect of visual amenity, the completed development will be afforded significant screening from existing woodland to the north and east of the Site, even in winter. The only features that would be readily visible from close quarters (and at particular locations) would be the brown roofs of the aggregate storage bays and the Asphalt Production Plant.

In regards to the assessment views, the likely effect on visual receptors can be summarised as follow:

- Minor to Moderate Neutral on recreational users of the canal towpath; and
- None to Negligible on users of Minet Country Park, workers at the surrounding industrial units, motorists and local residents.

In the three long distance views, the Proposed Development will either have No effect in the summer or a Negligible effect in the winter when more filtered views may become possible, although the depth of existing woodland is considered to be sufficient to reduce this likelihood.

In the three close distance views, the Proposed Development will introduce elements not uncharacteristic in the local context, although of a much higher design quality. Key amenity features within views will remain unaffected. The residual effect in summer will be Negligible. In winter more filtered views of the new elements will be visible and the edge definition more pronounced. The change will be both beneficial (as the development will replace views of the derelict Site, introduce new areas of landscaping along the set-back boundary wall and brown roofs on the aggregate storage bays) and adverse (as it will reinforce the urban/industrial context of the site). On balance, given that there has always been a presumption in favour of the Site's development for industrial use, the residual effect in winter will be Minor to Moderate Neutral.

The consented Southall Gas Works and Toll House developments will introduce further elements of urban and industrial development within close proximity to the Site. These elements, in particular the Toll House development's proposed coach parking area which will be located immediately adjacent to the canal (in proximity to the derelict building), will underline the industrial and urban context of the Site and the canal. Taller elements will also become a more common feature and will be visible above existing vegetation.

The Proposed Development will be consistent with national, regional and local policy on design and townscape, will safeguard important landscape features; will not result in the loss or major alteration of key features or elements of the baseline and will bring a derelict site back into use consistent with the prevailing context.

1 Introduction

1.1 Background

ENVIRON UK Limited (ENVIRON) was commissioned by FM Conway Ltd. ('the Applicant'), to produce a Townscape and Visual Impact Assessment (TVIA) for the redevelopment proposals at the former Powergen site ('the Site'), Bulls Bridge, Hayes. The Applicant proposes to redevelop the Site into an Aggregate Recycling Plant, Asphalt Production Plant, and Gully Waste Recycling Plant ('the Proposed Development'). Accordingly the Applicant intends to submit a detailed planning application to the London Borough of Hillingdon (LBH).

Following the receipt of an Environmental Impact Assessment (EIA) Screening Request compiled by ENVIRON, on behalf of the Applicant, in May 2011, the LBH confirmed that the development proposals do not fall within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations (as amended) ('the EIA Regulations'). However, discrete technical assessment reports will be required to accompany the planning application.

1.2 Scope of Report

The Townscape and Visual Impact Assessment considers the potential for the Proposed Development to affect the townscape character and visual amenity of the Site and its immediate surroundings, as well as the capacity of identified sensitive receptors to accommodate the proposed change.

The assessment reviews the relevant policy context in relation to townscape and visual amenity, and explains the assessment methodology. It then describes the current baseline conditions at the Site and its surrounds; identifies potential impacts; discusses the mitigation measures integral to the development proposals that would reduce or offset the magnitude of potential impacts; and finally, assesses the significance of residual effects. Consideration is given to direct and indirect impacts, during the construction works and once the redevelopment has been completed.

Two cumulative schemes have been considered in the assessment.

The assessment is supported by accurate visual representations (AVRs) provided in Figures 8.1 – 8.18.

2 Planning Policy

The Development Plan consists of the saved policies of the London Borough of Hillingdon Unitary Development Plan (1998); the London Plan (2011); and the emerging London Borough of Hillingdon Local Development Framework. Given the Site's close proximity to both the London Boroughs of Ealing, to the east, and Hounslow, to the south of the Site, some consideration has been given to prevailing policy as set out in these boroughs' adopted Unitary Development Plans (UDPs).

2.1 National

There is no national policy that specifically considers townscape or visual amenity, except where these are associated with heritage assets, as well as high quality and inclusive design, as discussed in the paragraphs below.

2.1.1 National Planning Policy Framework, 2012

The National Planning Policy Framework¹ (NPPF) came into force on 27th March 2012. It sets out the Government's economic, environmental and social planning policies for England and attempts to summarise in a single document all previous national planning policy advice (Planning Policy Statements and Planning Policy Guidance notes). Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

The basis of the NPPF is a presumption in favour of sustainable development, which should be pursued, amongst others, by seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

For decision-making this means *"approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole"*. Of particular relevance to this assessment, the NPPF aims to promote the delivery of good design of the built environment, which is considered indivisible from good planning and essential to making places better for people.

The NPPF attaches great weight to high quality design and ensuring, amongst other factors, that new developments are visually attractive with appropriate landscaping. It requires that the planning system contributes to protecting and enhancing the natural and local environment by protecting and enhancing *"valued landscapes"*.

It goes on to state at paragraph 58 that planning policies and decisions should aim to ensure that developments:

- function well and add to the overall quality of the area over the lifetime of the development;
- establish a strong sense of place;
- optimise the development potential of sites, creating and sustaining appropriate mix of uses;
- respond to local character and history, whilst not preventing innovation; and

¹ Department for Communities and Local Government, March 2012. National Planning Policy Framework. HMSO.

- are visually attractive as a result of good architecture and appropriate landscaping.

At paragraph 63, it states that in determining planning applications, great weight should be given to outstanding or innovative designs that help raise the standard of design in the area.

2.2 Regional

2.2.1 The London Plan – Spatial Development Strategy for Greater London, 2011

The London Plan² is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The following London Plan policies are of relevance to the Proposed Development:

- ‘Policy 5.21 - Contaminated Land’ which states that the Major supports the remediation of contaminated land and bringing such land back into beneficial use.
- ‘Policy 5.13 - Sustainable Design and Construction’ which states that development proposals should demonstrate that sustainable design standards are integral to the proposal and should meet the standards outlined in the Sustainable Design and Construction Supplementary Planning Guidance which include the following principles:
 - Minimising carbon dioxide emissions;
 - Efficient use of natural resources including making the most of natural systems both within and around buildings;
 - Minimising pollution (including noise, air and water run-off);
 - Minimising the generation of waste and maximising reuse and recycling; and
 - Promoting and protecting biodiversity and green infrastructure.
- ‘Policy 5.17 - Waste Capacity’ which states that proposals for waste management should be evaluated against criteria including the:
 - suitability of the location;
 - nature and scale of the activity proposed;
 - carbon benefits of the proposals; and
 - environmental impacts (noise, odour, water resource, transport visual impact).
- ‘Policy 7.1 - Building London’s Neighbourhoods and Communities’, which states that *“The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.”*
- ‘Policy 7.4 - Local Character’ which expands on the theme of local character and states that *“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.”*
- ‘Policy 7.5 - Public Realm’ which states that public space *“...should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context and incorporate the highest quality design, landscaping planting, street furniture and surface”.*
- ‘Policy 7.6 - Architecture’ which states that *“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.”* It goes on to set out a list of requirements of new buildings and structures including, inter alia, that they should:
 - be of the highest architectural quality;

² Greater London Authority, 2011. The London Plan – Spatial Development Strategy for Greater London. Greater London Authority.

- be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
 - include details and materials that complement, not necessarily replicate local architectural character;
 - not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings; and
 - optimise the potential of sites.
- 'Policy 7.8 - Heritage Assets and Archaeology' which states that "*Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural details.*"
 - 'Policy 7.10 - World Heritage Sites' which states that "*Development should not cause adverse impacts on World Heritage Sites or their settings...*"
 - 'Policy 7.16 - Green Belts' which states that the strongest protection should be given to London's Green Belt.

In addition to the above 'Policy 7.11 - London View Management Framework' and 'Policy 7.12 - Implementing the London View Management Framework' consider designated strategic London views and their management. The views include London Panoramas, Linear Views, River Prospects and Townscape Views.

The adopted London Plan identifies Hays as a strategic industrial location. In addition, the London Plan's Heathrow Opportunity Area includes the Hays-West Drayton Corridor in which the Site is located.

In June 2012, the Mayor published revised early minor alterations to the London Plan aimed at ensuring that the London Plan is fully consistent with the NPPF. The revised early minor alterations document also incorporates the early minor alterations issued for consultation in February 2012. It is anticipated that both sets of alterations will be considered together by an independent planning inspector at an examination in public (EiP) to be held in November/December 2012.

2.2.2 London View Management Framework Supplementary Planning Guidance, March 2012

The London View Management Framework³ (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.

An updated draft London View Management Framework SPG was consulted upon between July and October 2011 with a further consultation on view 27 Parliament Square to the Palace of Westminster in January 2012. The final updated LVMF SPG was published in March 2012.

³ Greater London Authority, 2012. London View Management Framework Supplementary Planning Guidance. Greater London Authority. London.

2.3 Local

2.3.1 Hillingdon Unitary Development Plan, 1998

LBH's current UDP⁴ was adopted in 1998. The five guiding principles which form the basis for the UDP policies and proposals are to:

- maintain and improve the environment;
- meet community needs;
- maintain a strong local economy;
- provide access to opportunities for all residents; and
- reduce travel demand.

In September 2007, the Government Office for London, under the direction of the Secretary of State, directed LBH to save certain policies within the UDP. Some of these saved policies will eventually be replaced by Hillingdon's Local Development Framework (LDF).

'Part One' saved policies of relevance to the Proposed Development are:

- Pt1.8 which aims *"To preserve or enhance those features of Conservation Areas which contribute to their special architectural and visual qualities."* Upon approval of the LDF Core Strategy this policy will be replaced by Policy HE1.
- Pt1.9 which aims *"To seek to preserve statutory Listed Buildings and buildings on the Local List."* Upon approval of the LDF Core Strategy this policy will be replaced by Core Strategy Policy HE1.
- Pt1.10 which aims *"To seek to ensure that new development will not adversely affect the amenity and character of the Borough's residential areas."* Upon approval of the LDF Core Strategy this policy will be replaced by Policy BE1.
- Pt1.26 which aims *"To encourage economic and urban regeneration in the Hayes/West Drayton Corridor, designated Industrial and Business Areas (IBAs) and other appropriate locations."* This policy will be retained within the LDF.

'Part Two' saved policies of relevance to the Proposed Development are:

- 'Policy OL5' which states that *"The local planning authority will normally only permit proposals for development adjacent to or conspicuous from the green belt if it would not injure the visual amenities of the green belt by reason of siting, materials, design, traffic or activities generated."* This policy will be retained within the LDF.
- 'Policy OL11' which states that in respect of green chains⁵, LBH "...will:-
 - (i) encourage the provision and improvement of suitable recreational facilities;
 - (ii) maintain their positive contribution in providing a visual and physical break in the built-up area;
 - (iii) conserve and enhance the visual amenity and nature conservation value of the landscape;
 - (iv) seek to improve public access to and through the area; and
 - (v) promote an overall identity for green chains throughout the borough."

⁴ London Borough of Hillingdon, 2007. London Borough of Hillingdon Unitary Development Plan (adopted 1998) Saved Policies 27th September 2007.

⁵ Green Chains are open spaces, usually along linear features such as a river or canal, which may extend across Borough boundaries. They serve a number of purposes, including recreation and nature conservation.

- ‘Policy OL26’ which states that LBH “...will protect trees and woodlands and encourage the preservation, proper management and in appropriate locations the extension of woodlands.” This policy will be retained within the LDF.
- ‘Policy BE4’ which states that “New development within or on the fringes of conservation areas will be expected to preserve or enhance those features which contribute to their special architectural and visual qualities; development should avoid the demolition or loss of such features.....” This policy will be retained within the LDF.
- ‘Policy BE10’ which states that “Planning permission or listed building consent will not normally be granted for proposals which are considered detrimental to the setting of a listed building.” This policy will be retained within the LDF.
- ‘Policy BE13’ which states that “Development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance.” This policy will be retained within the LDF.
- ‘Policy BE25’ which states that “The local planning authority will seek to ensure modernisation and improvement of industrial and business areas through careful attention to the design and landscaping of buildings and external spaces. Where appropriate it will seek improved vehicular and pedestrian access and circulation routes through the area, and environmental improvements.” This policy will be retained within the LDF.
- ‘Policy BE32’ which states that “When considering proposals for development adjacent to or having a visual effect on the Grand Union Canal, the local planning authority will seek to ensure that every opportunity is taken to:
 - (i) secure and where possible enhance the role of the canal and its immediate surrounds as a wildlife corridor;
 - (ii) secure environmental improvements appropriate to waterside areas;
 - (iii) ensure that buildings are of a design which complements the visual qualities of the canal in terms of scale, bulk, layout and materials;
 - (iv) conserve buildings or features associated with the working life of the canal;
 - (v) create new public access to the waterside and towpath linked to the footpath network in the surrounding area;
 - (vi) enhance or create views through and from the development, from and towards the watercourse; and
 - (vii) retain existing leisure moorings unless alternative provision is made in suitable locations.”

This policy will be retained within the LDF.

- ‘Policy BE34’ which states that “When considering proposals for development adjacent to or having a visual effect on rivers the local planning authority will, where appropriate, seek:
 - (i) to secure and where possible enhance the role of the river and its immediate surroundings as a wildlife corridor;
 - (ii) environmental improvements to waterside areas;
 - (iii) building designs which complement the visual qualities of the riverside;
 - (iv) public access to the waterside linked to the footpath network in the surrounding area;

- (v) a minimum 6 metres of land reserved and landscaped alongside rivers, suitable for public access; and
- (vi) to enhance or create views through and from the development, from and towards the watercourse.

This policy will be retained within the LDF.

- ‘Policy BE35’ which states that *“When considering proposals for major development adjacent to and visible from major road and rail connections to Heathrow and central London, namely the M4 and Heathrow spur, the A4, the A40, the Paddington to Bristol and the Marylebone to Birmingham railway lines and the Heathrow express link, the local planning authority will seek to ensure:*
 - *(i) that development is of a high standard of design, layout and landscape;*
 - *(ii) that where opportunities arise, attractive views and important local landmarks are opened up from these transport corridors.”*

This policy will be retained within the LDF.

- ‘Policy BE36’ which states that *“Within the areas identified in Figure 5 as being particularly sensitive, high buildings and structures, will only be permitted if the local planning authority is satisfied that they will not:*
 - *(i) mar the skyline;*
 - *(ii) intrude unacceptably into important local views; or*
 - *(iii) interfere with aviation and navigation.*

This policy will be retained within the LDF.

- ‘Policy BE38’ which states that *“Development proposals will be expected to retain and utilise topographical and landscape features of merit and provide new planting and landscaping wherever it is appropriate. Planning applicants for planning consent will be required to provide an accurate tree survey showing the location, height, spread and species of all trees where their proposals would affect any existing trees.”* This policy will be retained within the LDF.
- ‘Policy OE1’ which states that *“Planning permission will not normally be granted for uses and associated structures which are, or are likely to become, detrimental to the character or amenities of surrounding properties or the area generally, because of:*
 - *(i) the siting or appearance;*
 - *(ii) the storage or display of vehicles, goods, equipment or other merchandise;*
 - *(iii) traffic generation and congestion;*
 - *(iv) noise and vibration or the emission of dust, smell or other pollutants, unless sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable.*

This policy will be retained within the LDF.

- ‘Policy MIN16’ which states that *“The local planning authority in considering development proposals, will encourage the provision and improvement of premises and facilities for efficient and environmentally acceptable disposal, recycling, energy recovery or other handling and treatment of waste materials, subject to other policies in the plan.”* This policy will be retained within the LDF.

In addition to the above, Chapter 15 of the UDP, provides a number of site specific policies and proposals, which includes the Powergen/Bulls Bridge Site. It confirms that the Site is located within a designated Industrial and Business Area and has been identified as a major opportunity for employment generating development in the Regeneration Strategy for the Hayes/West Drayton Corridor. It suggests that development of this land should be on a comprehensive basis and goes on to state in 'Policy PR10' that "*Land at North Hyde Gardens, Hayes as identified on the proposals map should be developed for business, industrial and warehousing purposes and associated canalside activities within the conservation area and should take into account the following:*

- (i) the need for planned comprehensive treatment of the whole site;*
- (ii) the need for improvements to the junction of North Hyde Gardens and North Hyde Road;*
- (iii) measures to ameliorate the impact of traffic on residents;*
- (iv)adequate access arrangements for Nestles Conservation Area and canalside enhancement;*
- (vi) the contribution of the proposal to the economic regeneration of Hayes.*

This policy will be retained within the LDF.

Where certain policies were not saved, i.e. on Energy, Noise, Air Quality, reference is made to relevant corresponding London Plan Policies that would remain relevant until such time as the UDP is replaced by the LDF.

2.3.2 Adjacent Borough Unitary Development Plans

The London Borough of Hounslow's UDP Proposals Map confirms land to the south of the Grand Union Canal as a mix of 'Priority Employment Sites' and 'Metropolitan Green Belt'; the latter of which is partly allocated for minerals extraction.

The London Borough of Ealing's UDP Proposals Map confirms land to the east of the Paddington Branch as Employment Land beyond which are Residential Areas. The Site is not affected by any of the borough's locally identified key views or landmarks.

2.3.3 Draft London Borough of Hillingdon Local Development Framework, 2012

The LBH LDF comprises a suite of development planning documents including the Core Strategy and Development Management Plan Policies. The Core Strategy was submitted to the Secretary of State on 31 October 2011 and an independent Inspector has been appointed to conduct the Examination in Public (EiP) which commenced on 13 March 2012. The Core Strategy is expected to be adopted later in 2012.

The Core Strategy sets out the vision, strategic objectives, spatial strategy and policies for the spatial development of the borough over the next 15 years. Strategic Objectives relevant to the Proposed Development include:

- SO1: Conserve and enhance the Borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.
- SO2: Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment; are distinctive, safe, functional

and accessible; and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents.

- O3: Improve the quality of, and accessibility to, the heritage value of the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, biodiversity, education, health and wellbeing.

Core Policies of relevance to the Proposed Development are:

- 'Policy BE1: Built Environment' which states that LBH *"...will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents."* It goes on to state that new development should:
 - achieve a high quality of design in all new buildings and new public realm to enhance the local distinctiveness of the area, to contribute to community cohesion and to a 'sense of place';
 - be designed to be appropriate to the identity and context of surrounding buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials;
 - seek to protect the amenity of surrounding land and buildings;
 - improve areas of poorer environmental quality;
 - improve the quality of the public realm with proposals that respect the local character and landscape, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife;
 - be able to demonstrate compliance with the prevailing energy reduction requirements set out in the London Plan. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought.

In regards to appropriate locations for tall buildings, these will be defined in a Character Study and will include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. The height of buildings should be appropriate to the surrounding townscape.

- 'Policy EM2: Green Belt, Metropolitan Open Land and Green Chains' which states that LBH *"...will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains..."*
- 'Policy EM3: Blue Ribbon Network' which states that LBH will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors through the Biodiversity Action Plan, the Thames River Basin Management Plan, and developer contributions where appropriate. The Council will work with partners, adjacent local authorities and interested bodies to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.
- Policy EM4: Open Space and Informal Recreation' which states amongst others that LBH will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas).
- 'Policy EM7: Biodiversity and Geological Conservation' which states that LBH will protect and enhance all Sites of Importance for Nature Conservation, in particular Sites of Metropolitan and Borough Grade I importance.

- ‘Policy EM11: Sustainable Waste Management’ which states that LBH will aim, in conjunction with local partners, to reduce the amount of waste produced in the borough.
- ‘Policy HE1: Heritage’ which states that LBH will “....conserve and enhance Hillingdon's unique historic environment, including its heritage assets such as statutorily Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, Locally Listed Buildings, Areas of Special Local Character, and Archaeological Priority Zones and Areas, their settings and the wider historic environment.”

2.3.4 Southern Hillingdon Area Action Plan

The Southern Hillingdon Area Action Plan (AAP), forms part of the emerging Hillingdon LDF and provides locally specific policy guidance for future development.

Nine distinct areas are identified including the Central Corridor, Green Belt and Suburban Heartland. The Site is located within the Central Corridor which is described as:

- extending from Yiewsley/West Drayton/Hayes in the west to Bulls Bridge/Southall in the east;
- comprising a traditional industrial area designated as a strategic employment location/preferred industrial location;
- comprising a wide range of industrial activities with B8 storage and distribution activities accounting for 29% of floorspace;
- including the Grand Union Canal which offers the potential for regeneration; and
- including the Bulls Bridge site which is identified as an opportunity site.

Policy SHSA 7 specifically considers the Bulls Bridge Site Allocation and states that the three types of development would be deemed acceptable:

- Recycling centre;
- Distribution facility; and
- Renewable energy installation.

No guidance is provided in regards to design and landscaping requirements.

2.3.5 Hillingdon Design and Accessibility Statement Supplementary Planning Document, Consultation Draft 2006

This document provides an implementation framework for UDP policies and emerging LDF with the aim of delivering design quality in the urban realm. Objectives for industrial areas are to:

- improve the streetscape character of industrial areas;
- accommodate amenity space wherever possible;
- take action for better air quality;
- improve biodiversity along the borough's canals and waterways; and
- cut the risk for flooding by ecological design.

3 Assessment Methodology

3.1 Assessment Approach

The TVIA covers two areas of interrelated assessment:

- Townscape Effects: assessment of the Proposed Development's potential effects on the townscape character of the Site and the immediate surroundings of the Site; and
- Visual Effects: assessment of the potential effects of the Proposed Development on the visual amenity of short, medium and longer distance views of the Site and the immediate surroundings of the Site.

AVRs have been used as the principal means to consider the likely townscape and visual impacts and effects of the Proposed Development. The AVRs locate the Proposed Development in its existing physical and spatial context and illustrate the changes (in scope, scale and character) that would take place through comparison of the existing baseline and Proposed Development views of the Site.

The assessment methodology is based on best practice guidance provided in the 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA)⁶. It is noted that a revised GLVIA closed for consultation on 4th March 2012 with the publication of the new edition due in late 2012.

The assessment is qualitative, based on professional judgement. To ensure transparency and rigour the assessment methodology sets out clear criteria for assessing the sensitivity of the townscape and visual receptors, the magnitude of change and significance of residual effects.

The assessment has considered the development proposals, in particular the:

- development layout and elevational planning drawings;
- material palette;
- landscape proposals; and
- 3D geo-referenced model of the development proposals.

Built and cultural heritage resources (Listed Buildings and Conservation Areas) are considered in this assessment only in so far as they contribute to townscape character; the assessment does not provide a detailed assessment of the Proposed Development's direct impacts on such resources, as this is considered in a Heritage Impact Assessment accompanying the planning application.

3.1.1 Approach

The TVIA comprised the following steps:

- collection of baseline information and policy relating to townscape and visual amenity;
- telephone discussions with LBH in regards to any assessment views that would be of particular interest;
- visits to the Site and surrounding area;
- confirmation of the study area;
- selection of preliminary baseline assessment views and agreement with LBH;

⁶ The Landscape Institute and The Institute of Environmental Management and Assessment, 2002. Guidelines for Landscape and Visual Impact Assessment: Second Edition, Spon Press, London.

- commissioning of baseline photography and AVR production;
- characterisation of existing townscape and visual amenity sensitivity;
- review of the development proposals;
- impact identification;
- consideration of mitigation proposals integral to the development proposals; and
- assessment of residual effects.

The study area of the assessment was confirmed during site visits and by reference to the visibility of the Site from short, medium and long distance view locations. As such the study area comprises an area within 1 km radius of the Site.

During the visits observations were made and digital photographs taken. Observations included:

- a brief description of the main townscape elements;
- an assessment of the Site's visibility;
- identification of the main visible features; and
- an assessment of potential visual intrusion and remediation potential.

Preliminary, representative baseline assessment viewpoints were selected based on information gathered during desk based review, discussions with LBH and site visit observations. These were issued to LBH in May 2012 for their consideration with Sarah Harper (LBH Conservation Officer) confirming the appropriateness of the six viewpoints considered within this assessment on 22nd May.

AVRs of the six assessment views were produced for the baseline, proposed development and cumulative scenarios as follows:

- baseline assessment views were professionally photographed and viewpoint locations surveyed. The views are presented with the widest possible field of view (75 degrees) to represent a worst case scenario of what the viewer may see in a single frame; and
- a geo-referenced 3D Model of the Proposed Development, based on the planning submission drawings, was overlaid onto the photographs;

Grey block images were used to locate the Proposed Development within close distance views. Wirelines were used to locate the Proposed Development within long distance views and where hidden from view due to intervening buildings, bund forms or vegetation.

Two cumulative schemes have been considered in this assessment, namely:

- The Southall Gas Works Mixed Used Development (P/2008/3981-S) which is described on the GLA decision notice as follow: *"Demolition of 22 houses; the remediation of the land and the redevelopment of the site to deliver a large mixed use development including residential, non-food retail, food retail, restaurants, bars and cafes, hotel, conference and banqueting, cinema, health care facilities, education facilities, office/studio units, sport pavilion, an energy centre, multi-storey car park and associated car and cycle parking, landscaping, public realm, open space and children's play space."*; and
- The Toll House Development (67/94/APP/2010/2992) which is described on the LBH decision notice as follow: *"Change of use of the site for use as a coach park (Sui Generis) for use by a single coach operator only involving the erection of a building for ancillary use for the servicing of the operator's coaches and the provision of ancillary office space/staff facilities; the refurbishment of the Toll House for use as staff accommodation; associated landscaping; and the retained provision of car parking for the neighbouring boaters."*

Available information on these schemes was sourced from relevant planning portals and 3D models generated from available 2D plans.

As AVRs show summer baseline conditions, commentary has been provided on the likely effects of the Proposed Development during the winter, where considered appropriate.

It should be noted that the assessment of individual views within this report, considers the potential impact on the townscape and visual amenity as they are likely to be experienced by viewers. The AVRs presented are no more than an approximation to this, for a number of reasons:

- Viewpoints themselves are not fixed. Townscape is experienced for the most part as a progression of views or vistas by people who are moving through streets or spaces rather than standing still;
- The views included are shown as static images - the images are not kinetic and do not represent the changing 'experience' of that view. The actual viewing experience would be based on a number of factors which are not possible to recreate in this document, such as distance; movement; noise; uses; viewer expectations; proportion of scene affected; and viewing conditions;
- Viewers have peripheral vision; their view is not restricted by borders as a photograph is, and they can move their eyes and heads to take in a wide field of view when standing in one place. For this reason the widest possible field of view has been presented;
- Photographs do not reflect the perception of depth of field as experienced by the viewer due to parallax; nor is it generally possible for the AVR images to reflect the effect of atmospheric perspective; and
- Townscape is experienced not by the eye alone but by the interpretation by the mind of what the eye sees considered in the light of experience, knowledge and memory.

Accordingly, the conclusions of the potential impact of the Proposed Development on townscape and visual amenity were considered in the round and this should also be taken into account when considering the individual views.

Throughout the course of the assessment, consideration was given to comments and requests made by LBH and the GLA during pre-application consultation meetings.

3.1.2 Terminology

The assessment is necessarily technical in nature and therefore, a short overview of terminology used within this Chapter, is provided as follow:

- **Townscape Character:** The combination and interaction of physical elements such as buildings, spaces, topography and vegetation which give rise to qualities that have differing perceptual values; for example, degrees of spatial enclosure/exposure, the degree of uniformity/variety, the balance between natural and man-made influences and the ability to 'understand' (legibility) and navigate/access (permeability) an area. Together, these make up what is often called a 'sense of place';
- **Townscape Effects:** The changes in the character, land and the townscape which would occur because of a Proposed Development;
- **Views:** The visual perception of an area as a result of the sequence of views which people experience during the course of their activities. A distinction can be made between 'opportunistic' views (i.e. those experienced on a day-to-day basis, such as from a person's home, car or place of work) and 'intentional' views (i.e. those sought out for

amenity reasons). Intentional views may include 'private' views valued by individuals (e.g. a favourite stopping-point on a walk) and 'public views' that are publicly accessible. Intentional views such as views of landmarks designated in policy, are by definition assumed to be of greater value or sensitivity;

- **Visual Receptors:** An element or grouping of elements that will be directly or indirectly affected by a proposed development;
- **Visual Amenity:** The 'value of a particular area or view in terms of what is seen'. It is also considered as that part of a person's well-being that depends on their visual perception of the environment. Impacts on visual amenity depend, in large part, on the concept of receptor sensitivity. This assumes that people's sensitivity to visual change varies according to their activity and thereby their degree of interest in the views they experience. By convention, receptors such as residents and recreational users of open space are assumed to be highly sensitive, whilst receptors such as employees and people travelling for purposes other than recreation are assumed to be of low sensitivity; and
- **Visual Effects:** The changes in view resulting from a proposed development as seen from a specific viewpoint.

3.1.3 Significance Criteria

The assessment involves a degree of value judgement. Accordingly, the assessment seeks to be transparent by presenting clear justifications for assessing the sensitivity of the receptor, the magnitude of the potential change and the significance of the likely residual effects.

A consistent approach to the presentation of the assessment results has therefore been adopted as follows:

- the nature of the impact, i.e. direct (on the townscape or view itself) or indirect (on to the setting of the townscape);
- the probability of the impact occurring, i.e. certain, likely or unlikely;
- the geographical context of the impact, i.e. international, national, regional, local or site;
- the sensitivity of the receptor, i.e. high, medium or low;
- the magnitude of the impact, i.e. high, medium or low;
- the type of impact, i.e. beneficial, adverse or negligible/neutral; and
- the significance of the residual effect, quantified as either major; moderate; minor or negligible/none.

The significance of residual effects has been assessed as a function of the sensitivity of the receptor and the magnitude of impact or change. These are combined to give a significance weighting. Residual effects of major significance are considered to be of material consideration.

3.1.4 Assessment of Townscape Effects

The assessment of townscape effects considers:

- the baseline townscape character types and areas;
- the townscape's current condition (i.e. its value) and ability to accommodate change (i.e. its sensitivity);
- the magnitude of the change that would be introduced by the Proposed Development taking into consideration mitigation measures integral to the development proposals; and
- the significance of the residual effects.

The sensitivity of the townscape to change has been assigned by reference to:

- land form or topography;
- land use, including the value of the Site as a destination e.g. for tourists or recreation;
- physical condition and state of repair;
- spatial configuration (enclosure, legibility, accessibility, permeability); and
- value placed by society, reflected in statutory and non-statutory designations, and also cultural and associative value.

The magnitude of change has been assigned by taking account of the:

- physical extent of alteration; and
- relationship of the new elements to the existing scale and character of the townscape.

Categorisation of sensitivity, magnitude of change and how these criteria were applied in relation to significance thresholds are set out in matrix format in Table 3.1.

Table 3.1: Townscape Effects Significance Criteria

Townscape Sensitivity	Magnitude of Change		
	Low: No or minor loss or alteration to one or more key features/elements/ characteristics of baseline. New elements may not be uncharacteristic within receiving townscape	Medium: Partial loss of or alteration to one or more key features/elements/ characteristics of baseline. New elements may be prominent but may not necessarily be considered substantially uncharacteristic within receiving townscape	High: Total loss or major alteration/addition to key features/elements/ characteristics of baseline. New elements are uncharacteristic within receiving townscape or synergistic/ complimentary
Low: Undesignated area with few, if any valued features and no coherent 'sense of place'. Physical elements lack uniformity and coherence, are often of poor condition, with poor accessibility and permeability.	None	Negligible	Minor
Medium: Undesignated area or local designation, with some attractive/noteworthy features. Physical elements display some uniformity and coherence, of reasonable condition. There may however be evidence of alteration to/degradation /intrusion of foreign features/erosion of features resulting in mixed character and poor 'sense of place'. Reasonable level of accessibility and permeability. May include areas of regional designation, subject to townscape quality.	None - Negligible	Minor	Moderate

Table 3.1: Townscape Effects Significance Criteria

Townscape Sensitivity	Magnitude of Change		
	Low: No or minor loss or alteration to one or more key features/elements/characteristics of baseline. New elements may not be uncharacteristic within receiving townscape	Medium: Partial loss of or alteration to one or more key features/elements/characteristics of baseline. New elements may be prominent but may not necessarily be considered substantially uncharacteristic within receiving townscape	High: Total loss or major alteration/addition to key features/elements/characteristics of baseline. New elements are uncharacteristic within receiving townscape or synergistic/complimentary
High: Designated area of international or national, large concentration of valued features that combine to create a destination, experience of uniformity, richness, harmony and a distinct 'sense of place'. Good condition, accessibility and permeability. May include areas of regional designation, subject to townscape quality.	Negligible - Minor	Moderate	Major

3.1.5 Assessment of Visual Effects

The assessment of visual effects considered:

- those views that would be most representative of the Site and its surroundings, from where the Site would be most visible and those understood to be of particular strategic importance from a policy, conservation and visual amenity perspective;
- the ability of the selected baseline views to accommodate change (i.e. the sensitivity and importance of the view) and the sensitivity of the viewer (or receptor);
- the magnitude of the change that would be introduced to the view by the Proposed Development, taking into consideration mitigation measures integral to the development proposals; and
- the significance of the residual effects.

Magnitude of change was assigned by reference to the extent of alteration to the view.

Categorisation of sensitivity, magnitude of change and how these criteria were applied in relation to significance thresholds are set out in matrix format in Table 3.2.

Table 3.2: Visual Effects Significance Criteria

View and Receptor Sensitivity	Magnitude of Change		
	Low: No or minor loss or alteration to one or more key features/elements/ characteristics of baseline view. New elements may not be uncharacteristic within receiving setting	Medium: Partial loss of or alteration to one or more key features/ elements/ characteristics of baseline view. New elements may be prominent but may not necessarily be considered substantially uncharacteristic within receiving setting	High: Total loss or major alteration key features/elements/ characteristics of baseline view. New elements are uncharacteristic within receiving setting or synergistic/ complimentary
Low: Undesignated view. View does not include any landmark features, is of low amenity value (includes signs of neglect and degradation) and is incidental to the viewer. Viewers are travelling in vehicles or are office based.	None	Negligible	Minor
Medium: Undesignated view or locally designated view defined in policy. View includes some features of value or interest and limited signs of neglect or degradation. Views could be either incidental or intentional, with some amenity value. Viewers could include pedestrians and cyclists. Could include regionally designated views with limited quality.	None - Negligible	Minor	Moderate
High: Designated view of national or international importance. View includes landmark features of international or national or importance with high amenity value. Could include views of regional importance of particular quality. Viewers are recreational users and visitors, possibly there for the sole purpose of enjoying the view or the public amenity. Viewers could also include residents.	Negligible - Minor	Moderate	Major

4 Existing Baseline Conditions

4.1 Site Context and Location

Hillingdon comprises the western most London borough. It borders Hertfordshire to the north; the London Boroughs of Harrow, Ealing and Hounslow to the east; Surrey to the south; and Buckinghamshire to the west. Approximately half of the borough is covered by open land, which is primarily used for agriculture and recreational activities. However, it also contains legacies of past mineral extraction in the form of poorly restored land, particularly in the south.

The Grand Union Canal runs for about 20 kms through the borough and is an important spatial feature linking the urban area with open land and countryside. Another key feature of the borough is Heathrow International Airport.

Hillingdon has four regionally important Strategic Industrial Locations totalling approximately 270 ha. These include three Preferred Industrial Locations (PIL) namely Uxbridge Industrial Estate, Victoria Road/Stonefield Way in South Ruislip and Hayes Industrial Area. The latter is the largest industrial area in the borough and benefits from easy access to the motorway system and Heathrow Airport, improved by the completion of the Parkway (A312) in 1992.

The former Powergen Site, where the Proposed Development is proposed, is located at Bulls Bridge within the Hayes Industrial Area and centred at national grid reference NGR TQ 107 792 as shown in Figure 4.1.

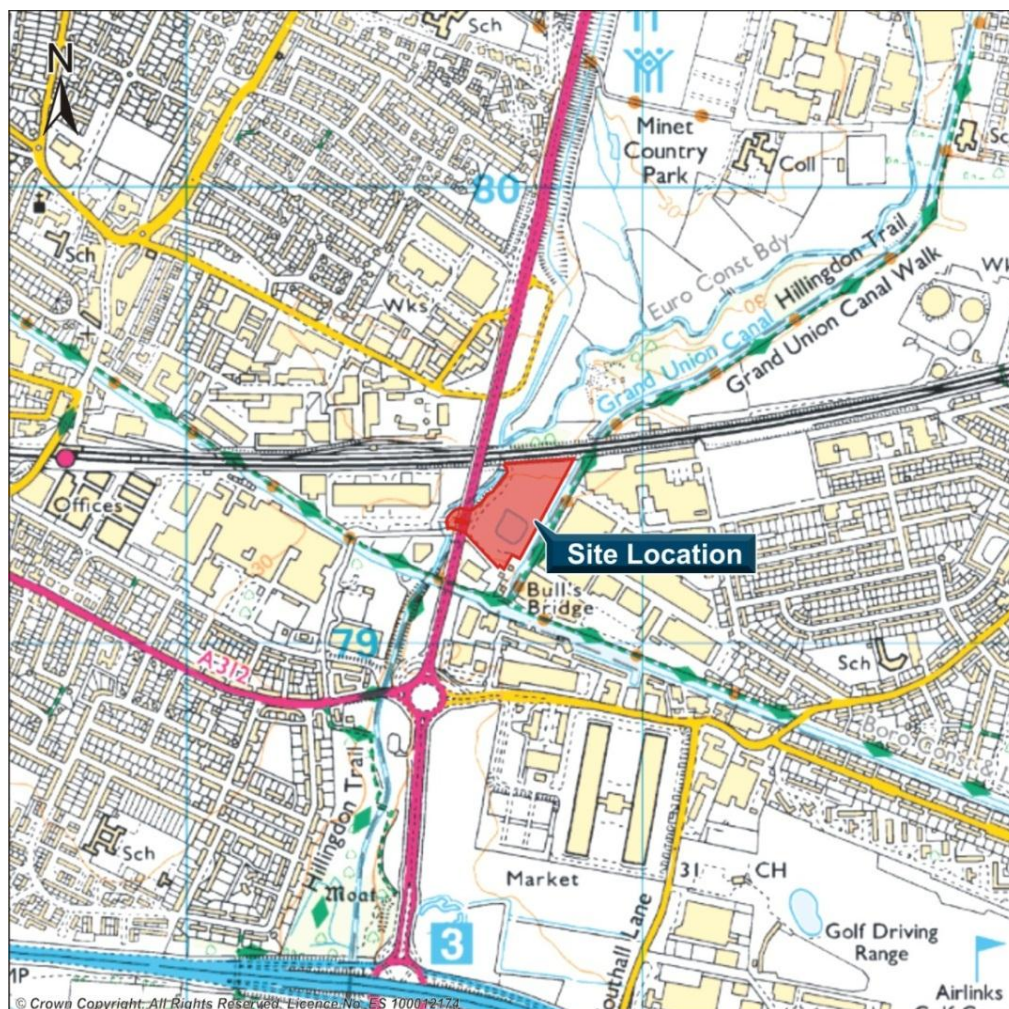


Figure 4.1: Site Location

Access to the Site is off North Hyde Gardens Road, which connects to the A312 (the Parkway) via North Hyde Road. The A312 southbound provides access to Junction 3 of the M4 motorway, approximately 1.3 km south of the Site.

The Site is firmly wedged in amongst distinct spatial barriers/elements. As such, the Site is bound to the:

- north by the Paddington to Bristol railway line;
- east by the Paddington Branch of the Grand Union Canal;
- south by North Hyde Gardens Road; and
- west by the Yeading Brook and Parkway flyover.

North Hyde Gardens Road passes under the Parkway flyover to terminate at the Grand Union Canal. An access road off North Hyde Gardens Road to the DHL Lorry Park cuts north-south through the western extent of the Site.

Bulls Bridge marks the junction where the Paddington Branch re-joins the main canal. It is from this point, where the Paddington Branch is shared for some distance between the London Boroughs of Ealing and Hillingdon. The Ealing side of the canal includes the towpath which adjoins the former site of the Southall Gas Works and the industrial land at the junction with the Grand Union Canal mainline. The area south of the Grand Union Canal, including a Tesco Superstore, falls within the London Borough of Hounslow.

4.2 Site Surroundings

The Site is located within an industrial estate and its immediate surroundings are therefore predominantly characterised by medium to large scale warehouse and industrial development. These uses are supplemented by:

- warehouse scale commercial uses with large areas of car parking and hardstanding;
- transport infrastructure; and
- open space.

Residential areas and community uses occur peripherally, with the Grand Union Canal a key linear open space feature.

A more detailed description of surrounding land uses are provided in Table 4.1.

Table 4.1: Surrounding Land Uses		
Direction	Description	Distance from Site boundary
To the North	Paddington to Bristol (Great Western) railway line (rail corridor approximately 40 m wide)	0 m and approximately 5 m elevated above ground level
	Minet Country Park, a Borough Grade I Site of Importance for Nature Conservation and part of LBE's Greenbelt	50 m, beyond railway line
To the North-East	Southall Gas Works, currently vacant and derelict, but where a residential led, mixed use development has been granted planning approval by the Greater London Authority.	100-200 m (closest residential units beyond railway line and a newly proposed ramped access road)
To the East	Grand Union Canal (Paddington Branch) with woodland, leisure moorings and towpath, designated as a Metropolitan Site of	0 m

Table 4.1: Surrounding Land Uses		
Direction	Description	Distance from Site boundary
	Importance for Nature Conservation	
	Brent Park Industrial Estate	20 m, beyond canal and tow paths
	Residential Houses	475 m, beyond the industrial estate
To the South	North Hyde Gardens Road	0 m
	Volvo Truck and Bus Centre	10 m
	Undeveloped British Waterways Property with dilapidated buildings one of which is the old Canal Toll House	5 m
	Grand Union Canal with Bulls Bridge (to the south-east), the latter of which is a Grade II Listed Structure	75 m beyond Volvo Centre and British Waterways Property
	Tesco Superstore, Commercial and Industrial Warehouse development	Immediately adjacent and south of the Grand Union Canal
To the South-West	Residential Houses	400 m
To the West	A312 Parkway	0 m and approximately 10 m elevated above ground level
	Yeading Brook	0 m
	British Airways Corporate Engineering Offices and DHL Distribution Park	50 m beyond Yeading Brook
To the North-West	Tarmac Plant	86 m and separated from Site by elevated A312 and railway line.

4.3 Site Description

The Site is roughly rectangular in shape and occupies an area of approximately 3 hectares. It is brownfield having been previously operational as a Powergen site, a fuel storage facility for the nearby Bulls Bridge Power Station and a creosote works.

All previous structures have been demolished and the Site is now characterised by a perimeter earth and rubble bund and colonised regeneration vegetation as shown in Figure 2 photos of the Site. The boundary is defined by derelict and vandalised hoarding and steel palisade fencing and flytipping (particularly the western boundary).

Apart from the 3 m high perimeter bund, the Site is generally flat. Vegetation comprises tall ruderal and scrub species, a strip of broadleaved woodland along the Site's eastern boundary, as well as Giant Hogweed along the Site's western boundary, which is typical of derelict and wasteland sites. No trees are otherwise found on-site.

The Site has been subject to an Arboricultural Survey which has confirmed the majority of trees as Category C Norway Maple trees (along the eastern boundaries), with only two Category B English Oak trees (along the northern boundary on the adjacent railway embankment). Category C trees (on the eastern boundary) have been assessed as being of low quality and value in accordance with the BS5837 categorisation system based upon their structural and

physiological condition as individual trees, as well as their remaining contribution. However, the trees collectively form an attractive landscape, visual and structural feature.



Figure 4.2: Site Photographs

4.4 Topography and Land Cover

Hillingdon varies from open country and housing development in the north to a more heavily developed, urban/industrial structure in the centre and south. Whilst the south of the borough is relatively flat, the north becomes increasingly hilly as the land rises toward the Chilterns in the north-west.

As can be seen in Figure 4.3, the topography of the study area is generally flat at approximately 29.5 m AOD, with:

- higher ground located to the north-west at approximately 34.5 m AOD (although these areas are generally built-up) and around transport infrastructure (M4 and railway line); and
- lower ground concentrated around the course of the Yeading Brook and River Crane at approximately 27.5 m AOD, as well as at localised areas within Minet Country Park and at Cranford Park south of the M4.

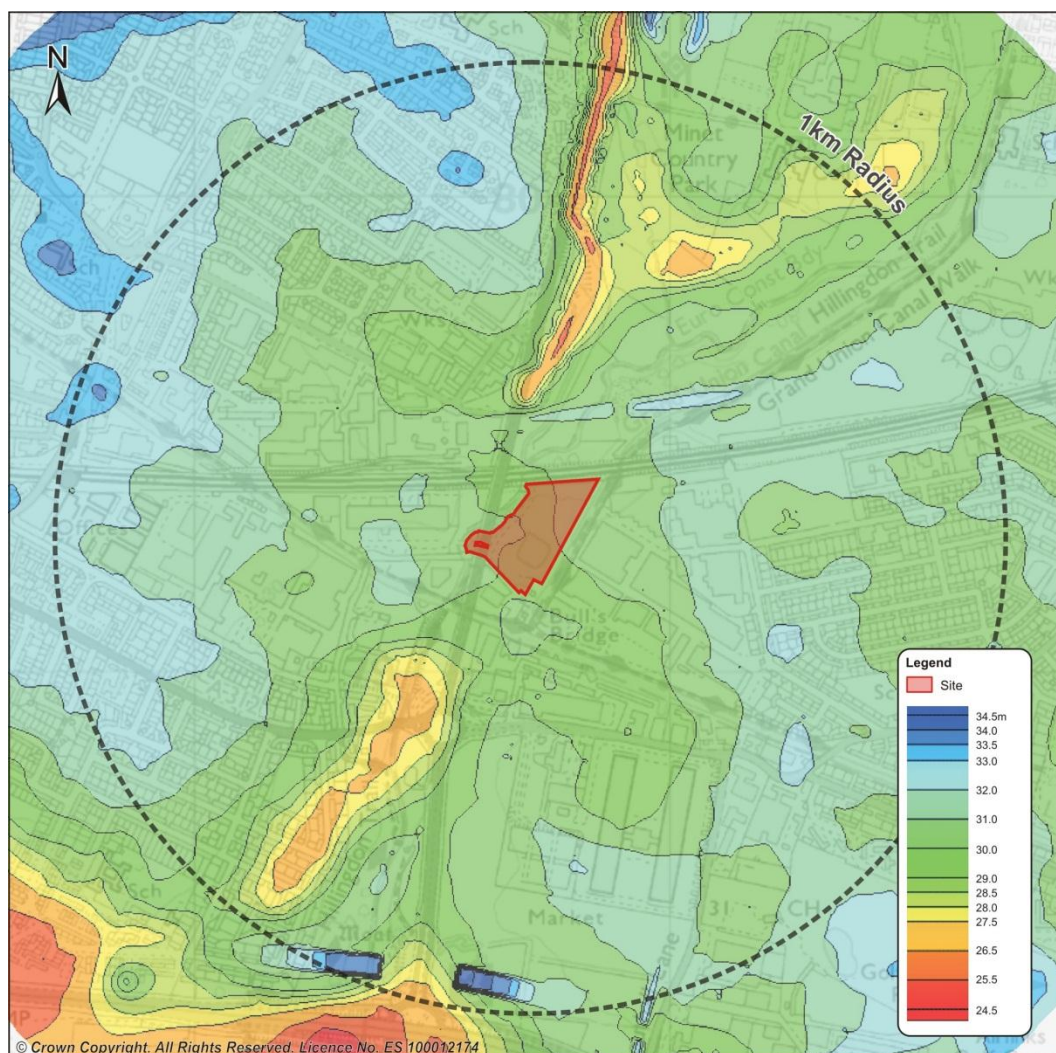


Figure 4.3: Study Area Topographic Levels (without development and vegetation)

Land cover primarily comprises industrial and residential development together with some areas of open space and vacant land.

As discussed previously, the Site itself is also generally flat (site level around 29.6 mAOD), apart from a 3 m high bund (top of bund 32.5 - 33.3 m AOD) that defines the entire site perimeter. As described above, the flat parts of the Site are sparsely vegetated with tall ruderal

and scrub species along and on top of the perimeter bund. A strip of broadleaved woodland is the only noteworthy feature along the Site's eastern boundary.

4.5 Designated Features

4.5.1 World Heritage Sites

There are no World Heritage Sites within the Site boundaries or within the study area.

4.5.2 Scheduled Monuments

There are no Scheduled Monuments within the Site boundaries or within the study area.

4.5.3 Registered Parks and Gardens

There are no registered parks or gardens within the Site boundaries, or within the study area.

4.5.4 Heritage Designations: Listed Buildings

There are no listed buildings within the Site boundaries. However, Figure 4.3 shows and Table 4.2 summarises the listed structures within the study area. It is noted that by definition all nationally listed structures are of high value and sensitivity to change whilst locally listed structures are considered of medium value and sensitivity to change.

Table 4.2: Locally and Nationally Listed Buildings and Structures

Listed Feature	English Heritage Description	Distance from Site and Setting Description
Bulls Bridge (18 th -19 th century)	- Grade II listed. - Canal bridge in painted brick. - Single depressed arch with some blue engineering brick repairs at base. - Band course at base of parapet. Some multi-coloured stock brick repairs.	75 m south-east Setting comprises a number of divergent amenity and industrial elements, lacking uniformity and a distinct sense of place. Existing low aesthetic industrial warehousing form a distracting element in the setting.
Benlow Works - Orchestrelle Factory (1909-11)	- Grade II listed. - Reinforced concrete frame by E P Wells; brick exterior by Walter Cave. 4 storey and 19-bay elevation. - Entrance bay, 7th from left, has semi-circular stepped brick architrave to doorway and segmental-arched metal casements flanked by rusticated pilasters slightly set forward and breaking parapet. Similar segmental-arched casement windows. - Striking elevation articulated by brick piers and full-height semi-circular arched stepped architraves framing alternate single and double bays, the latter with broad Diocletian windows to 3rd storey which are set above central brick piers. Crenelated parapet. Similar rear and side elevations.	650 m west Setting comprises a number of industrial estates and an elevated railway line in close proximity.

Table 4.2: Locally and Nationally Listed Buildings and Structures

Listed Feature	English Heritage Description	Distance from Site and Setting Description
Western International Market - Brentford Drinking Fountain (1877)	• Grade II listed. • Grey granite, cast iron railings and lamp standards. • Octagonal spire standing on a tall middle section, with cornice and gabled niche to each side. • Projecting bowls to each side. Engaged columns to each corner, which stands on a tall base with steps to east and west, and lamp standards to each corner: • Decorative Gothic Revival railings along north and south sides between posts. • Arrived at its present location in June 1974, having been previously located north-west of Kew Bridge.	650 m south-east Setting comprises the Market site.
Nestles Works (Nestle UK LTD) (1930s)	• Locally listed. • Factory by Wallis Gilbert. • Retains the inter-war “factory in a garden” character. • Dramatically cantilevered canopy at rear. • Key landmark along the Grand Union Canal.	250 m west Setting comprises an industrial estate. It lacks a distinct sense of place.

As can be seen from the above table, the setting of these heritage features within the study area is of an industrial nature. The majority of industrial estates are dated and of poor townscape and architectural quality. The only exceptions to this, are more recent developments immediately to the west of the A312, including the British Airways Corporate Engineering Offices. As such the settings of the listed structures are considered to be of low to medium value and sensitivity to change

4.5.5 Heritage Designations: Conservation Areas

The Site itself is not located within a Conservation Area (CA). However, as shown in Figure 4.4 the:

- Bulls Bridge Conservation Area is located immediately adjacent to the Site’s eastern boundary, partly within LBH and partly within LBE;
- Canalside Conservation Area is located to the east of the Paddington Branch’s centreline (to include the opposite bank of the canal) within LBE; and
- Botwell: Nestles Conservation Area is located 400 m to the west, beyond the British Airways site, within LBH.

The **Bulls Bridge Conservation Area** was designated in 1973 and stretches from the railway bridge in the north, up to and including Bulls Bridge in the south. The CA contains the following key features:

- the Paddington Branch of the Grand Union Canal;
- a well-established strip of woodland containing mature Norway Maple trees;

- leisure moorings along the western edge of the canal which have assumed a permanent presence, adopted parcels of land in-between the woodland trees as private amenity/domestic utilitarian space, that is poorly maintained and visually unattractive;
- a derelict Toll House and cottage along the western edge of the canal; and
- a grassed tow path on the eastern edge of the canal (which falls within LBE) bounded by industrial warehouse development.

A Conservation Area Appraisal for the CA could not be sourced from publicly available sources. Based on the above description, the CA is considered to be of medium value.

The setting of the CA is primarily informed by the uses and physical condition of the CA's immediate curtilage, which currently comprises derelict land and industrial uses. As such the setting of the CA is considered to be of medium value and sensitivity to change.

A Conservation Area Appraisal for the **Botwell: Nestles Conservation Area** (designated in 1988) could not be sourced from publicly available sources. By virtue of its local designation, its value and sensitivity to change are considered to be medium. The same rating would apply to the CA's setting.

LBE's **Canalside Conservation Area** is described as follow in its Conservation Area Appraisal:

- Designated in 1993 and extended in 1994;
- Includes the whole length of the Grand Union Canal within Ealing, except for a stretch between Norwood Top Lock and the Hanwell Locks, which are contained within the St Mark's Church and Canalside CA;
- Includes the waterway, its banks and towpath, as well as bridges crossing it and adjoining spaces and buildings that contribute to the historic character and interest;
- At Bulls Bridge (and LBE's western boundary) the Paddington Branch leaves the Grand Union Canal main channel. As such, only the Paddington Branch's eastern bank and towpath form part of the CA;
- Southern parts of the Paddington Branch are formed of long, straight sections with occasional bends, whilst the more northerly parts of the Paddington Branch tend to be more winding with regular bends creating foreshortened views;
- Comprises different character areas, ranging from areas of large scale industry, dense sub-urban housing estates; built-up residential development; and green rural areas;
- Because of the canal's long corridor and adjoining towpath, a series of narrow but often very long tree lined spaces are created, spatially divided by occasional bridges, or by bends in the canal's course, which both act as stops to views;
- In more industrial parts spatial enclosure is often created by the surrounding large industrial buildings or tall fences/hoardings/walls which screen views out of the CA;
- The view from Bulls Bridge northwards along the Paddington Branch (See assessment view 3) and the view from the railway bridge at the canal towpath southwards across to the vegetated margin on opposite bank (see assessment view 2) are identified as two views that make an important contribution to the CA's character.
- Views include leisure moorings (which provide a cluster of boats along the historic wharfs), a number of historic, but derelict canal related buildings (including the cottage for the manager of the junction). The elevated railway line and bridge provides a stop to views northwards.

- The Paddington Branch is a relatively isolated section of the Grand Union Cana running outside the residential areas through areas of disused industrial land and wasteland managed as a wildlife reserve (Minet Country Park). Its most important characteristics are the:
 - area nearest the junction of the canals which retains two canalside buildings including an early 19th century house, presumably built for a manager of the junction, and a smaller cottage, which both make a positive contribution to the CA. Both buildings are derelict and at risk of loss;
 - junction of the canals which retains the historic walling materials used in the canal's construction and 19th century repairs including brown brick and stone dressings;
 - LBH side of the canal, which retains areas of historic stone copings along the wharf used for leisure moorings;
 - land on the LBH side of the canal, to the north of the railway bridge, covered with scrub land, which provides a rich wildlife habitat that can be appreciated from the towpath within the CA; and
 - long, straight sections, which provide good vistas, in relatively private areas.

Based on the above description and site visit observations, the value of this CA and its setting is considered to be medium and their sensitivity to change also medium.

4.5.6 Heritage Designations: Other

As shown in Figure 3, one Area of Special Character (East and West Walk Hays) is located 800 m to the north-west of the Site. The Area of Special Character is well contained within existing residential area. By virtue of its local designation it is considered to be of medium value and sensitivity to change.

4.5.7 Landscape Designations

There are no landscape designations covering the Site and the Site is not located within the Metropolitan Green Belt. However, to the north of the Site is the 36 ha Minet Country Park which is a 'Green Flag' Open Space and form part of the Greenbelt. It comprises meadows, hedgerows, mature oaks and ponds. In addition the Yeading Brook and the Grand Union Canal forms part of the UDP's Green Chain Network. By virtue of its local designation it is considered to be of medium value and sensitivity to change.

4.5.8 Nature Conservation Designations

There are no nature conservation designations covering the Site. However, three Sites of Importance for Nature Conservation are located within 1 km of the Site, namely:

- London's Canals Site of Metropolitan Importance for Nature Conservation (SMINC) which includes the entire Grand Union Canal (closest point 50 m south of the Site) and the Paddington branch which lies immediately adjacent to the eastern boundary of the Site;
- Crane Corridor SMINC which comprises a corridor of habitats that follows the River Crane and is situated approximately 380 m to the south-west of the Site; and
- Yeading Brook, Minet Country Park and Hitherbroom Park Site of Borough Grade I Importance for Nature Conservation (SBINC) which comprises approximately 68 hectares of grassland and is situated approximately 25 m to the north of the Site.

By virtue of their designation they are considered to be of medium value and sensitivity to change.

4.6 Public Rights of Ways

The Public Rights of Way network in the borough as recorded on LBH's Definitive Map and Statement is approximately 112 km (69 miles) long and contains 366 footpaths, 11 Bridleways and 10 BOATS (byway open to all traffic). It contains large sections of the Grand Union Canal but canal towpaths are legally part of the canal. Towpaths are generally owned by British Waterways who are normally responsible for their upkeep and enforcement of their bylaws. LBH has no direct responsibility for the maintenance or improvement of canal towpaths, but is works with British Waterways to promote use of the canal routes.

Public Rights of Ways, towpaths and footpaths within the Study Area, are shown in Figure 4.3 and form part of a number of local trails including the:

- Hillingdon Trail⁷;
- Cranford Park to Bulls Bridge⁸; and
- Dog Rose Ramble⁹

4.7 Local Landmarks

There are no local landmarks within the Site boundaries. Bulls Bridge and Nestle Factory are both considered to be local landmarks within the study area, whereas the Tarmac development and Southall Gas Works Holder are noticeable tall features within the urban skyline, together with the stacks of the Nestle Factory.

4.7.1 Tree Preservation Orders

There are no tree preservation orders covering the Site. However the strip of woodland within the Bulls Bridge CA immediately to the east, enjoys the same level of protection afforded by a Tree Preservation Order by virtue of its inclusion in the CA.

4.8 Townscape Character Types and Areas

4.8.1 Natural England Character Zones

Natural England's Character Map of England identifies the Site as falling within the Inner London Character Area, which is further unpacked within Natural England's document 'the London Landscape Framework'¹⁰. This regional framework identifies three natural landscape areas in LBH, namely Colne Valley, Ruislip Plateau and Hayes Gravels.

The Site is located within the Hayes Gravels natural landscape type which is described as follow:

- Gradual, topography but fairly constant slope from north to south, with few summits which limits opportunities for views;
- In the far west the dominant built form is of recent residential and commercial development;

⁷ A 32.1 km walk through Hillingdon's countryside from Cranford to Harefield. The walk passes through nature reserves, parks, meadows, parks and open spaces, the Grand Union Canal, Yeading Brook and the River Pinn.

⁸ A 3.2 km walk that offers riverside views and the chance to explore historical Cranford Park House and church of St Dunstan in Cranford Park.

⁹ 8 km walk that starts and finishes in Ealing, through farmland and meadows alongside the Yeading Brook in Hillingdon.

¹⁰ Alan Baxter, Sheila Flynn on behalf of Natural England (2011) London's Natural Signatures: The London Landscape Framework. Natural England.

- Few areas of natural landscape remain within the built-up area and in the west, small areas of semi-natural habitats build up a fragmented ecological network;
- Streams winding across river terraces are typically enclosed by winding lines of trees and strips of damp woodland;
- Key environmental assets include Minet Country Park/Grand Union Canal. Minet Country Park partly comprises reclaimed derelict land and is recently created rough grassland, with areas of older more natural meadow. The scrubby pits and hillocks support a rich flora and diverse birdlife;
- Overland rail and road infrastructure do not serve as corridors of natural vegetation; and
- London Clay is the dominant bedrock with deposits of Boyn Hill Gravel and Langley Silt. Sand and gravel in the west have been extensively worked, with quarried areas largely backfilled but not built over.

4.8.2 Study Area Local Character Types and Areas

Table 4.3 summarises the key local character types and local character areas (LCA) within the study area, as shown in Figure 4.4.

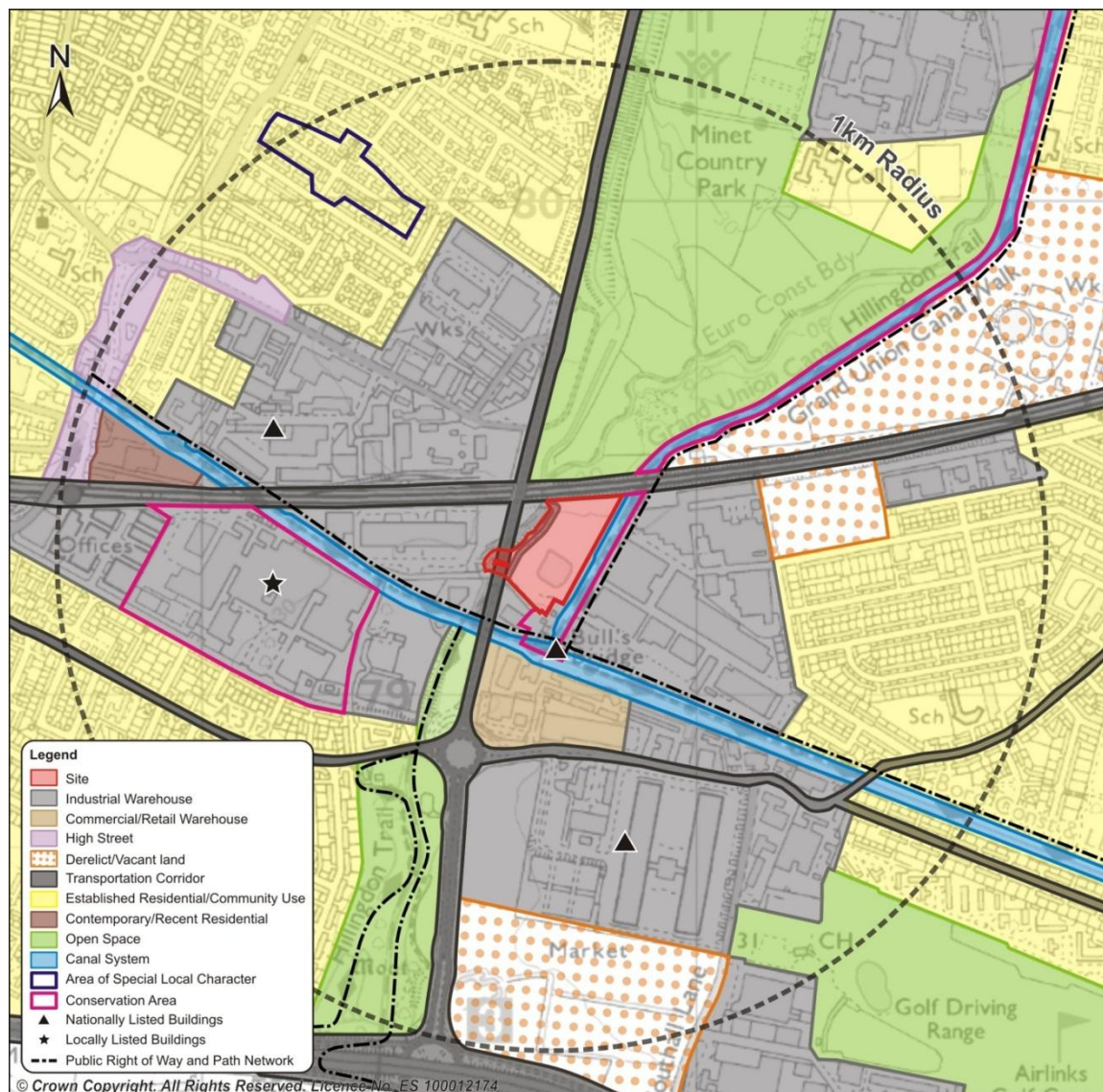
Table 4.3: Local Character Types and Areas		
	Character Type	Character Areas and Description
1	Industrial Warehouse	This character type is dominated by coarse grained development comprising large footprint warehouses and industrial sheds. The average building height is 3 storeys. Design quality is generally low and layouts dominated by large areas of hard standing used for storage or car parking. Road verges are unkempt and landscaping lacking. The Nestle factory and the Tarmac development are notable exceptions to this, comprising structures in excess of 10 storeys. More recent warehouse development is located in a wedged portion of land to the west of the Parkway and north of the Grand Union Canal. It comprises the British Airways Technical Engineering Offices, Volvo, as well as Vodaphone. Areas are traversed by busy roads, notably the A312 and Pump Lane. The character areas are considered to be of low value and of low sensitivity to change.
2	Commercial/Retail Warehouse	This character type is concentrated around the Tesco Superstore and Toys 'R' Us development to the east of the Parkway and the south of the Grand Union Canal, within the Bulls Bridge Industrial Estate. It comprises 2+ storey utilitarian warehouse/large scale buildings set within extensive areas of landscaped car parking. Although coarse grained, landscaping assists in softening the impact on the townscape. Nevertheless, these character areas are considered to be of low value and of low sensitivity to change.
3	High Street	This character type comprises small - medium scale buildings tightly arranged along Hayes High Street which forms strong terraces and coherent forms. Buildings comprise typical small scale businesses, 1 – 2 storeys high with some residential uses at first floor level. The townscape is characterised by a high level of activity at street level with associated visual and physical clutter. The character area is considered to be of low to medium value and of low sensitivity to change.

Table 4.3: Local Character Types and Areas

4	Derelict/Vacant Land (including the Site)	This character type is found in a number of locations across the study area, but most notably so: - at the old Southall Gas Works which comprises vast areas of overgrown hardstanding and buildings; and - to the south of the Western International Market which comprises land allocated in the London Borough of Hounslow UDP as 'Area of Reach for Minerals'. These areas have a wasteland character and are therefore considered to be of low value and low sensitivity to change.
5	Transportation Corridor	The local environment is significantly affected by rail and transport infrastructure, in so far as the spatial barriers they create and the associated noise and air emissions generated. Noise is intrusive and constant at close distance with exposed parts of Minet Country Park and the Grand Union Canal particularly blighted. Some of these corridors, such as the Parkway and elevated rail line, may afford fleeting views in transit. The character type is considered to be of low value and low sensitivity to change.
6	Established Residential/Community Use	This character type predominantly comprises semi-detached houses, interspersed with small areas of recent residential development, high rise apartment blocks (12 storeys) and community facilities. Semi-detached houses are typically arranged along streets forming strong terraces and coherent forms, with large back gardens. These areas are considered to be of medium value and sensitivity to change. High rise apartments and community facilities are set back from the road and of coarser scale. The built form is less coherent and lacks spatial definition. Accordingly it is considered to be of low-medium value and of low sensitivity to change.
7	Contemporary/Recent Residential	This character type comprises the newly constructed High Point Village development of high rise apartment blocks (8-9 storeys) located just off from the Hayes and Harlington station, on the edge of the Grand Union Canal. Design quality is considered to be high and therefore of medium value. The design would be able to withstand change more readily and therefore is considered to be of low sensitivity to change.
8	Open Space	This character type is represented by two sites of nature conservation importance, namely: - Minet Country Park to the north of the Site which partly comprises reclaimed derelict land and is recently created rough grassland, with areas of older more natural meadow. The scrubby pits and hillocks support a rich flora and diverse birdlife; and - Yeading Brook to the west of the Site. These spaces are located in closed proximity to key transport infrastructure and therefore significantly affected by noise intrusion and beyond by existing large scale development and infrastructure readily visible on the skyline. The character type should be of medium - high value and sensitivity to change; however when the current condition of the character area is taken into account, a rating of medium value and sensitivity to change is considered more appropriate.

Table 4.3: Local Character Types and Areas

		Airlinks Golf Course (an 18 hole manicured open space) is located beyond the Western International Market and would not be affected by the Proposed Development.
9	Canal System	This character type comprises the waterway, towpath and bridges of Grand Union Canal and the Paddington Branch. Within the study area, the curtilage of this linear open space feature is typically adversely affected by industrial uses, unkempt edges, derelict land and open space detracting from the tranquillity of the canal system. It is made up of a series of narrow but often very long tree lined spaces, spatially divided by bridges, or by bends in the canal's course, which both act as stops to views. With the exception of the new High Point Village, development has turned its back onto the canals. Accordingly, the value and sensitivity to change of this LCA is considered to be medium.

**Figure 4.4: Local Character Areas and Designated Areas**

4.8.3 Site Character

As discussed above, the Site has been cleared of all buildings and comprises overgrown, derelict land. It is considered to be of low value and low sensitivity to change, with the exception of the strip of woodland trees on the eastern boundary. These trees provide the only structural, coherent and placemaking element on the Site whilst also creating a landscape and visual barrier to the CA beyond and thus represent/are of high value.

4.9 Visibility

As discussed above, the study area is characterised by predominantly flat topography with no summits which limits opportunities for elevated views.

The Site is spatially and visually well contained within a 'bowl' defined by a raised railway embankment and dense woodland to the north, woodland and industrial development to the east; industrial development to the south; and industrial development to the west together with the raised A312 from where views are constrained due to high railings and lack of pedestrian access.

Visibility in and out of the Site is therefore limited to the immediate surrounding uses.

4.10 Visual Amenity

The visual amenity of the Site and surrounding area is determined mainly by prevailing land use, built pattern, public realm and by the perceived pleasantness or quality of the aforementioned.

4.10.1 Study Area Visual Amenity

Within the study area, industrial development has a key influence on views with the only visual relief provided by vegetation lined canals and large areas of open space.

The visual amenity of LCAs surrounding the Site are closely linked to the value and sensitivity of the townscape as described above and can therefore be summarised as follow:

- Industrial Use: Low;
- Commercial/Retail Warehouse: Low;
- High Street: Medium;
- Derelict/Vacant Land: Low;
- Established Residential/Community Use: Medium;
- Contemporary/Recent Residential: High;
- Open Space: Medium - High; and
- Canal System: Medium (where lined by industry or vacant land) - High (where lined by open space and substantial vegetation).

4.10.2 Site Visual Amenity

The Site both contributes to the amenity of some views, and detracts from the amenity of others. Its derelict and wasteland condition detracts from the amenity of the immediate surroundings whilst its woodland trees on the eastern boundary re-inforces the woodland within the Bulls Bridge CA to create a pleasant visual screen and sense of enclosure to the canal. Accordingly the majority of the Site's visual amenity value is considered to be low and its

sensitivity to change also low, whilst the trees are considered to be of high visual amenity value and sensitivity to change.

4.10.3 Locally Designated Views

Although LBH references key views within their UDP, no designated views have been identified within the UDP. The Site is not located within any of LBE's designated views.

4.10.4 Baseline Assessment Views

As mentioned above, the Site is spatially and visually well contained. Accordingly views from residential areas to the north-west, east and south-west are constrained by intervening urban and industrial development, whilst visibility along the northern and eastern reaches of the Hillingdon Trail and canal towpaths are constrained by vegetation.

The principal visual receptors are therefore limited to properties along the immediate Site boundaries.

Site visits were undertaken to 'ground truth' potential publicly accessible locations from where the Proposed Development might be visible.

Factors that informed the selection of viewpoints included:

- prevailing landform;
- influence of intervening or screening vegetation and built development;
- locations of key sites and/or routes of tourist/visitor/recreation interest;
- locations of the closest residential receptors;
- views that would be most representative of the Site and its immediate context, as well as the prevailing landscape/townscape character;
- locations from where the Site would be most visible (worst case); and
- locations understood to be of particular importance from a planning perspective (where relevant).

Consideration was also given to the:

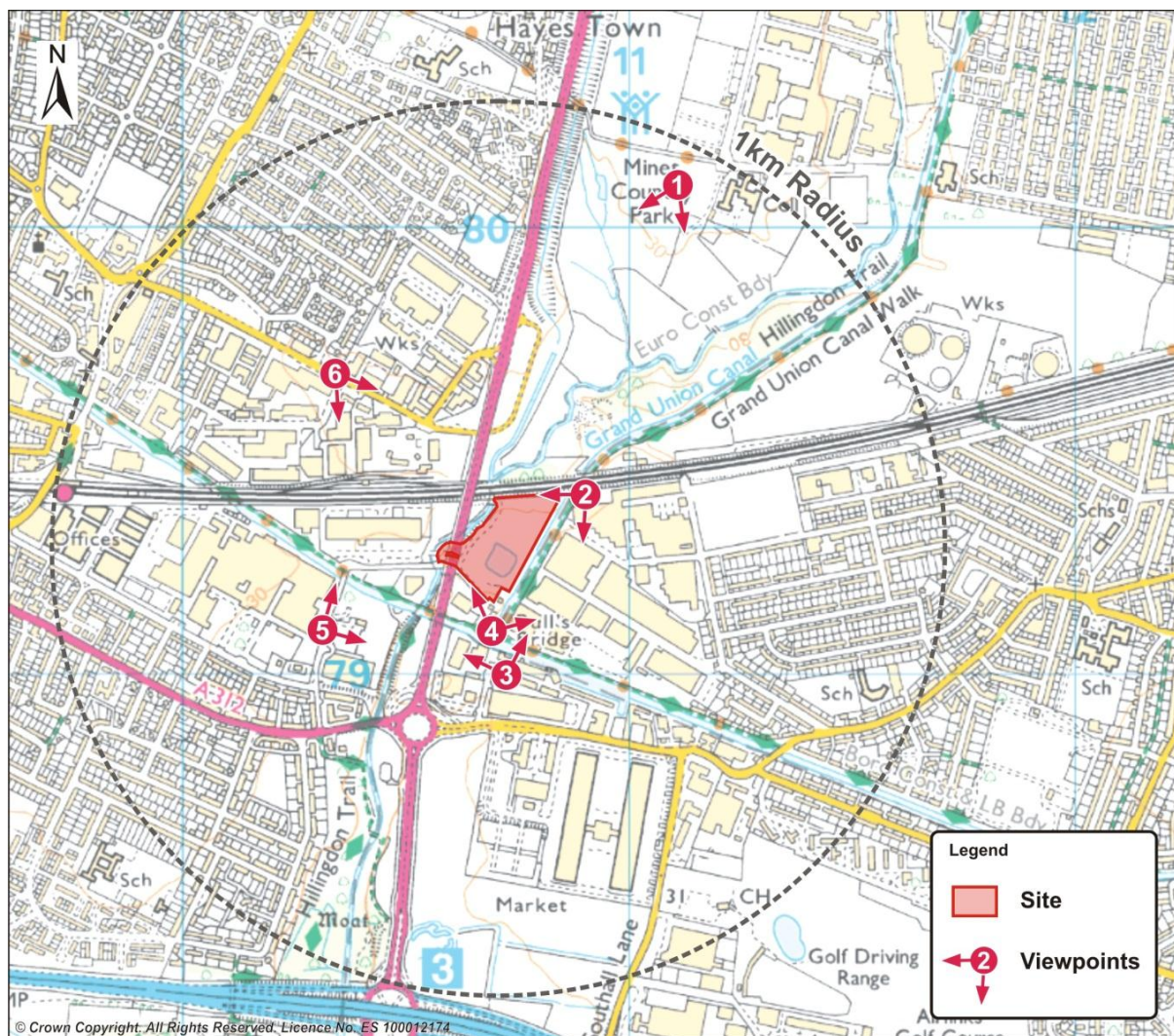
- location and context of viewpoint locations;
- activity of or type of viewer;
- accessibility of the view and hence level of exposure; and
- nature of each view (whether intentional, fragmented/ intermittent or continuous).

Public vantage points (from where multiple receptors such as pedestrians, cyclists, residents, visitors and motorists would be able to see the Site) are considered more important in guidance and are therefore typically considered within TVIAs. In selecting proposed assessment viewpoints, the aim was therefore to provide representative views (not exclusive or selective) with 'as wide as possible' fields of view and from representative directions around the Site. Accordingly views from select private properties were not considered for the assessment.

Baseline viewpoints selected for assessment, are described in Table 4.5 and shown in Figure 4.4. The existing visual amenity of these views is discussed in Figures 8.1, 8.4, 8.7, 8.10, 8.13 and 8.16.

Table 4.4: Baseline Assessment Views

Ref	Location	Distance/Direction	Local Character Area
1	Minet Country Park	900 m north-east	Open Space
2	Paddington Branch Towpath	50 m north-east	Canal System
3	Grand Union Canal Leisure Moorings	150 m south-	Canal System
4	Bulls Bridge	75 m south	Canal System
5	North Hyde Road	400 m south-west	Industrial Use, Established Residential/Community Use
6	Pump Lane	500 m north-west	Industrial Use

**Figure 4.5: Baseline Assessment Viewpoints**

It is noted that pre-application consultation responses received from the GLA, requested the consideration of potential views from the proposed Southall Gas Works development site, as well as elevated areas within the greenbelt. As indicated above, the Site's visibility is constrained by its spatial containment and the generally flat topography of the study area. The Gas Works site levels are similar to the Site at 30-31 mAOD. This is also the case with the

green belt areas in proximity to the Site, with some areas as low as 24.5 m AOD. Visibility from these areas would be constrained by intervening built form and infrastructure such as the elevated rail line and the Parkway, with only the tallest features of the Proposed Development likely to be visible, if at all. Accordingly, no AVR have been prepared from these locations although commentary is provided within this TVIA, where appropriate.

4.10.5 Sensitive Receptors

Existing receptors that could potentially be impacted upon by the Proposed Development include:

- Landscape features of value, such as the woodland trees;
- The setting of the Grade II listed Bulls Bridge to the south-east of the Site;
- The setting of the Bulls Bridge and Canalside Conservation Areas to the east and south of the Site;
- The setting of Minet Country Park to the north of the Site;
- LCAs within proximity to the Site;
- Recreational users of the canals and potentially visitors to the immediate area. The sensitivity of these visual receptors will be dependent upon the location and context of the view, whether an acknowledged viewpoint (purposefully created for appreciation or interest) or changing (kinetic)/ fragmented/ intermittent (i.e. the dynamic nature of a view gained while travelling through an area).

5 Proposed Development

5.1 Proposed Development Scope

The development proposals are for the construction and operation of an Aggregate Recycling Plant; Asphalt Production Plant; Gully Waste Recycling Plant; together with associated ancillary structures and facilities, car and HGV parking, regrading and landscaping.

The redevelopment proposals provide for:

- clearance and spreading of the existing bund material across the Site (as outlined in the Proposed Development's Land Contamination Strategy Report);
- capping of the Site with concrete and/or asphalt as appropriate for circulation and parking;
- construction of administration offices;
- construction of an Aggregate Recycling Plant;
- construction of a Gully Waste Recycling Plant;
- construction of an Asphalt Production Plant; and
- implementation of landscaping.

Upon completion the Aggregate Recycling Plant will have a maximum process and recycle capacity of approximately 300,000 tonnes per annum (tpa) of waste material extracted from pavements that will otherwise have been landfilled. Some of this material will be used within the Asphalt Production Plant which will at completion, have a production capacity of 300,000 tpa. In addition, the Gully Waste Recycling Plant, will accept material from road sweepers and gully suckers (that will otherwise have been sent to landfill) to recycle up to 20,000 tpa. The recycled water and the recovered solid materials from this process will be redirected back into the Aggregate Recycling Plant.

The Proposed Development's key objective will be to recycle all the waste materials that arise from the delivery of the Applicant's wide ranging services. These include asphalt; road and pavement sub base, paving, concrete and gully wastes such as gully waste and road sweepings.

The Proposed Development will also serve as an operating centre for the Applicant's Term Maintenance Division by providing parking for vehicles and storage for equipment and materials.

A maximum of 79 workers will be catered for at the Site upon completion of the full development which will include lorry drivers and Term Maintenance operatives working out of the Site.

5.2 Proposed Development Layout

Figure 5.1 illustrates the layout of the Proposed Development, which has been informed by a number of site limitations, environmental considerations and operational requirements, including:

- the constrained area of the Site, especially following the set back of the eastern Site boundary to safeguard existing woodland trees on-site and immediately to the east of the Site;
- environmental issues including the location of sensitive receptors, the visibility of the Site, the setting of the Site; the past uses at the Site;

- the Applicant's operational experience based on their existing facilities at Dartford and Erith;
- site logistical arrangements including internal circulation and swept path analyses; and
- design criteria, including the desire to ensure uniformity in building appearance and to 'contain' industrial features to least visible areas of the Site.

In light of the re-spread of existing bund material across the Site and capping layers on top, the current site levels are likely to be raised by up to a maximum of 1.2 m. These materials will be retained by means of a 1.2 m high retaining wall along the entire site perimeter. The following boundary treatment will be implemented on top of this retaining wall:

- north-west: 2.4 m palisade fence;
- north-east :6 m acoustic boundary wall;
- east: 7 m acoustic boundary wall;
- south-east: 3-5 m acoustic boundary wall with 1.2 m high landscaping planters;
- south: 2 m acoustic boundary wall with 1.2 m high landscaping planters; and
- west: 2.4 m palisade fence.

In all instances the walls, and their respective heights, are provided for acoustic attenuation purposes.

Road access will be provided from two points along the existing road - one access point to the main facility and one access point to the staff car parking located beneath the A312 Parkway.

The development layout will comprise the following:

Northern and North-Eastern Site Area:

- Aggregate Recycling Plant including Washing Plant and Inbound Material Stockpile up to 5 m high
- Low level cement silo
- Water storage tank
- Staff welfare and storage facilities

Eastern Site Area:

- Inbound storage bays
- Covered aggregate storage bays
- Site storage and/or parking (comprising hardstanding areas, enclosed as necessary)
- Water storage tank

Southern Site Area:

- Asphalt Plant
- Asphalt HGV tracking lanes and parking spaces
- Site storage

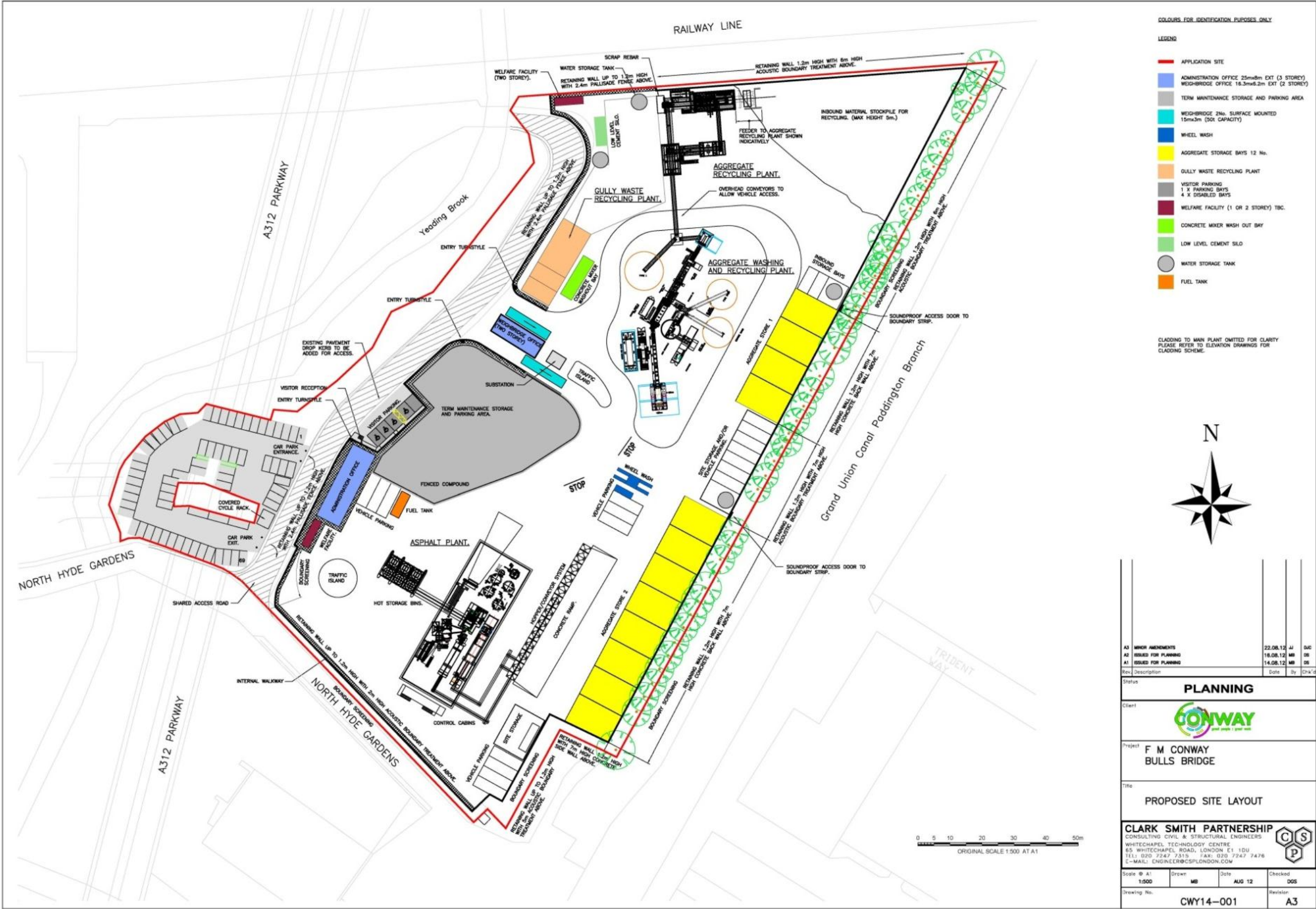


Figure 5.1: Proposed Development Layout

Western Site Area:

- Landscaped car park with 70 car parking spaces, five cycle and five motorcycle spaces
- Staff welfare facilities
- Office building and visitor car parking spaces
- Term Maintenance Yard (enclosed as necessary) and fuel storage areas
- Main site entrance point with entry and exit roads, incorporating weighbridges, on either side of the weighbridge office including the plant control room
- Gully Waste Recycling Plant
- Concrete washout bay
- Water storage tank
- Diesel fuel tank with 60,000 litre capacity and bunded containment of 110%.

Central Site Area:

- Hardstanding and circulation routes
- Drive-through wheel wash

5.3 Proposed Development Components

This section discusses in more detail the component parts of the Proposed Development, as well as ancillary components.

5.3.1 Aggregate Recycling Plant

The Aggregate Recycling Plant will comprise a processing plant, screens, washing plant, hoppers, conveyors, fines treatment equipment, control cabins, inbound storage bays (of block wall or sleeper construction) and other ancillary plant, equipment and structures.

The processing plant will be fully housed/enclosed as necessary to accord with the Proposed Development's noise and vibration impact assessment. Dry product conveyors will be enclosed whilst wet product conveyors will be open; dust suppression will be fitted as appropriate (water sprays).

Recovered materials delivered to the Site for recycling will be from the Applicant's existing contracts and will be stored in the inbound storage bays.

On-site processes will be subject to the conditions of any waste management license as appropriate, issued by the Environment Agency, as is the case with the Applicant's existing Dartford Facility.

5.3.2 Asphalt Plant

The Asphalt Plant will comprise the production unit, an asphalt hot storage facility (with six 80 tonne capacity bins), twelve covered aggregate storage bays and ancillary plant, equipment and structures, including three sea-container style units for the storage of spare parts and equipment.

It will have a rated capacity of 160 tpa incorporating a parallel dryer drum for the use of hot RAP, which will significantly increase the proportion of RAP that can be used in different product mixes.

The hot storage facility would be fed by an enclosed conveyor from a ground level unloading facility. These component parts will all be fully contained and clad as show in Figure 5.2.

The fleet of vehicles serving the Asphalt Plant will be parked in the south-western corner of the Site. All vehicles would be fitted with air brake silencers, rubber tailgate buffers and white-noise proximity beepers (as per the loading shovel).

The Asphalt Plant will be subject to the conditions of a Local Authority Pollution Prevention Control (LAPPC) Permit, issued by LBH.

The Permit will control all aspects of the operation through a series of enforceable conditions that will specify the acceptable levels of any emission including smoke, moisture, odour or airborne dust. Any breach of these conditions could potentially lead to revocation of the Permit by the Local Authority.

5.3.3 Gully Waste Recycling Plant

The Gully Waste Recycling Plant comprises a shallow sloping concrete pad (10 x 24 m), filters and two below ground tanks for the treatment and recycling of gully sucker waste and road sweeper waste arising from street cleansing activities. At maximum output, up to 20,000 tpa of waste will be treated and recycled.

The plant process will be subject to the conditions of any waste management license as appropriate, issued by the Environment Agency.

5.3.4 Cement Silo

The low level cement silo will comprise a 100 tonne capacity, prefabricated steel constructed silo. Cement from the silo will be taken by the Applicant's fleet of volumetric concrete mixer trucks as required, to facilitate the mixing of concrete at the point of use. No concrete will be produced on-site. The operation and maintenance of the cement silo will be governed by the terms of an LAPPC issued by LBH.

5.3.5 Concrete Washout Bay

The proposed Concrete Washout Bay, or settlement bay, will be used to wash down volumetric concrete mixers at the end of each working day. Through a system of weirs, the water will be recycled for re-use and residues will be removed for re-processing in the Aggregate Recycling Plant. The use of the Concrete Washout Bay will be subject to the conditions of a LAPPC Permit or Discharge Licence as may be deemed appropriate, by the Local Authority or Environment Agency.

5.3.6 Term Maintenance Yard

The Term Maintenance Yard will comprise the following:

- Open storage of plant, equipment and materials such as paving slabs, setts, lighting, street furniture etc.;
- Low-level enclosed storage of plant equipment and material items such as power tools, PPE, high value items and items requiring inside storage;
- Vehicle parking; and
- Security fencing.

5.3.7 Welfare Facilities

Up to six Portacabin style units will be provided along the perimeter of the Site to provide changing, washing, toilet, drying and seating areas.

5.3.8 Office Buildings

Two buildings will be provided on-site:

- Two storey weighbridge office from where site access and plant control will take place.
- Three storey administrative office that will provide for general site and contract management and control.

5.3.9 Ancillary Components

The following ancillary components will be provided within the Proposed Development:

- Service supply cabins/buildings including brick constructed substations;
- Two surface mounted 50 tonne capacity weighbridges (15 x 3 m) located on either side of the Weighbridge Office;
- Up to 70 car parking spaces for employees/visitors beneath the A312 Parkway flyover;
- Up to 50 HGV parking spaces;
- Fuel storage tanks;
- Up to four water tanks, each with 60,000 litre capacity;
- Recycling skips and waste bins;
- CCTV;
- Site lighting (in accordance with lighting strategy to be developed post consent); and
- Landscaping.

5.4 Proposed Development Appearance

5.4.1 Massing and Scale

The scale and massing of proposed buildings and structures are dictated by standard plant and process requirements, although a reduction in the height of the Asphalt Plant has been achieved during the design process by separating the proposed storage facility from the main production plant. This will limit visual impact considerably.

The principal elements of the proposal will range from 7.55 to 27.8 m as shown in Figure 5.2 and outlined in Table 5.1.