

Proposed Mixed Use Retail and Residential Development Planning Statement

Harbourside Investments Ltd and WM Morrison Supermarkets PLC

July 2018

LICHFIELDS



LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places
for over 50 years.

lichfields.uk

© 2018 Nathaniel Lichfield & Partners Ltd, trading as Lichfields. All Rights Reserved. Registered in England, no. 2778116. 14 Regent's Wharf, All Saints Street, London N1 9RL

Formatted for double sided printing.

Plans based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office.

© Crown Copyright reserved. Licence number AL50684A

16195/NG/HY

16144344v1

Contents

1.0	Introduction	1
2.0	Key Background Information	2
	The Applicant	2
	The Site and Surrounding Area	3
	Relevant Planning History	3
	Brief Description of the Proposal	4
	Pre-Application Engagement	5
3.0	Relevant Planning Policy	6
	Statutory Development Plan	6
	Other Material Considerations	8
	Key Planning Issues	9
4.0	Planning Assessment of the Proposals	11
	Principle of Development	11
	Affordable Housing	12
	Residential Standards	13
	Design/ Townscape	15
	Residential Amenity	18
	Heritage Considerations	19
	Transportation	20
	Natural Environment	21
	Energy/Sustainability	24
	Concluding Remarks	25
5.0	Conclusions	26

1.0

Introduction

1.1

This Planning Statement has been prepared by Lichfields on behalf of Harbourside Investments Ltd and WM Morrison Supermarkets PLC.

1.2

It accompanies an application for planning permission at Morrisons, 43-67 High Street, Yiewsley for:

“Demolition of the existing buildings and the redevelopment of the site to provide a replacement Class A1 foodstore, with residential units above, basement car parking and associated works.”

1.3

The purpose of this Planning Statement is to assess the proposed development against relevant policies in the statutory development plan, having regard to other relevant material planning considerations.

1.4

The Planning Statement draws upon other documents accompanying the application as outlined below.

- 1 Air Quality Assessment, prepared by RPS;
- 2 Arboricultural Assessment, prepared by Tim Moya Associates;
- 3 Archaeological Desk Based Assessment, prepared by CGMS;
- 4 Daylight and Sunlight Assessment, prepared by Lichfields
- 5 Design & Access Statement prepared by Hester Architects;
- 6 Draft Construction Management Plan, prepared by Deacon & Jones;
- 7 Energy Strategy, prepared by Watkins Payne;
- 8 Flood Risk and Drainage Statement, prepared by Ward Cole;
- 9 Planning drawings, prepared by Hester Architects;
- 10 Preliminary Risk Assessment, prepared by WSP;
- 11 Noise Assessment, prepared by Sharps Redmore;
- 12 Statement of Community Involvement prepared by Luther Pendragon;
- 13 Sustainability Statement, prepared by Watkins Payne;
- 14 Transport Assessment and Travel Plan, prepared by Redwood Partnership;
- 15 Townscape and Visual Impact Assessment, prepared by Lichfields; and
- 16 External Lighting Layout (4330/P/E/3010 Rev P) prepared by Watkins Payne.

2.0 Key Background Information

2.1 This section sets out information on the applicant and the site, including a review of the planning history, before describing the development that is the subject of this planning application. This will inform the planning policy assessment in Section 4.0.

The Applicant

2.2 The application is submitted on behalf of Harbourside Investments Ltd and WM Morrison Supermarkets PLC.

Harbourside Investments Ltd

2.3 Harbourside Investments Ltd is an associated company of Citygrove Securities PLC. Citygrove is a property development and investment company specialising in commercial and residential projects covering the UK, Spain and Germany, from its offices in London and Madrid.

WM Morrison Supermarkets PLC

2.4 WM Morrison Supermarkets PLC (Morrisons) is one of the leading supermarket chains in the country, and operates an existing store on the application site.

2.5 Headquartered in Bradford since 1899, Morrisons is a British food retailer with more than 100,000 colleagues in 493 stores serving over 11 million customers every week.

2.6 It is British farming's biggest supermarket customer and all Morrisons-branded fresh meat and everything within its butchers' counters is 100% British.

2.7 Foodmakers and shopkeepers at heart, Morrisons has over 9,000 trained butchers, bakers, fishmongers, cheesemongers and other skilled in-store specialists making more and more food in its stores.

2.8 Morrisons has its own sites making meat, fruit & veg, fish, bakery and fresh food products – 18 in all – and is unique in preparing and making more than half of the fresh food sold in our stores. Food manufactured in its sites and stores is showcased with 'Morrisons Makes It' branding.

2.9 Morrisons is becoming even more competitive by cutting prices on groceries and continuing to offer great value on good quality products. It tailors the offer of each one of its stores to local tastes and demographics.

2.10 It also offered popular services including cafés, pharmacies, dry cleaners and over 300 petrol stations with further services being added all the time.

Morrisons in the community

2.11 Morrisons is committed to giving back and making a difference both nationally, and directly in the local communities it serves.

2.12 All of its stores are encouraged to take part in local events throughout the year and initiatives that matter to its customers.

2.13 Each of its stores has a Community Champion. Its role is to provide a link between the store and the local community through:

- 1 Organising in-store collections for charities important to colleagues and customers.
 - 2 Arranging donations for local charity events.
 - 3 Engaging with local schools and groups by giving talks or tours on a range of subjects including healthy eating and fair trade.
 - 4 Representing Morrisons at local events like food or agricultural shows, carnivals and community gatherings.
- 2.14 In 2016 Morrisons rolled out the Unsold Food to Charity programme to all stores. This programme makes sure good food is never wasted and is instead donated to local community causes that can use it such as soup kitchens, community cafes, schools and hospices.
- 2.15 Edible unsold fresh fruit and vegetables, bread, tins and packet goods can be donated. Its stores are now donating on average two trolleys full of food per store per week to causes.

The Site and Surrounding Area

The Development Site

- 2.16 The 0.52 ha development site is located off of Yiewsley High Street and currently comprises an existing Morrisons Supermarket (3,340 sqm) and a surface level and basement car park (approx. 114 spaces).
- 2.17 The existing building is a two storey building fronting on to Yiewsley High Street. The car park, which is located to the rear of the building, can be accessed from St Stephen's Road which runs adjacent to the southern boundary of the site. The Grand Union Canal is located to the south of St Stephen's Road.
- 2.18 The site is located within West Drayton/Yiewsley Town Centre. This is designated as a District Centre in the London Plan and identified as a Major Town Centre (and part of the primary shopping area) in the saved policies of the UDP.
- 2.19 The site does not sit within a Conservation Area and there are no Tree Preservation Orders (TPOs) located on or adjacent to the site. The site falls within flood zone 1.

The Surrounding Area

- 2.20 The land to the northwest of the site is largely dominated by St Matthews Church of England Primary School and locally listed building, the Church of St Matthew. Retail, employment and residential uses are a feature on the rest of St Stephen's Road and along the High Street to the north.
- 2.21 The site is located approximately 250m to the north of West Drayton Train Station, which operates First Great Western services into London Paddington and to the wider southwest. This station will become part of the Crossrail route in 2019. The site is also well served by the local bus route, with stops located less than 100m from the site on Yiewsley High Street and at West Drayton Train Station. At present, the site has a PTAL rating of 3. However, it is understood that this rating may increase on the opening of the Crossrail network.

Relevant Planning History

- 2.22 A review of the available planning history search shows that the site was developed pursuant to planning permission ref., 2370J/81/. This permission allowed for the erection of a mixed use development on 0.5ha of land to include general offices, parking and service facilities alongside the retail store.

2.23 More recent planning applications include general extension works to the store (approved February 2009; ref. 2370/APP/2008/3520) and internal refurbishment works to include the “conversion of existing Class A2 offices at first floor for use as offices/welfare facilities; changes to the external envelope, windows, doors; alterations to the customer car park and other external works; and, renewal of the plant at roof level and the installation of new roof edge protection” (ref. 2370/APP/2008/3565). This was approved March 2009.

2.24 There is no further relevant planning history.

Brief Description of the Proposal

2.25 The proposed development includes the demolition of all the existing buildings on the site. A new Class A1 foodstore will be provided, along with 144 residential units. Parking will be provided across two basement levels.

2.26 The proposed Class A1 foodstore will provide 1,643 sqm floorspace (GIA). The net sales area will be around 1,064 sqm. It is intended that the store will be operated by Morrisons; the existing operator of the current foodstore on the development site.

2.27 144 residential units are to be provided as part of the proposed development. This includes 141 units over six storeys above the foodstore. A further three duplex properties are proposed to front St Stephen’s Road.

2.28 A mix of unit sizes and tenures are proposed as set out in Tables 2.1 to 2.4 below.

Table 2.1 Tenure Mix

Tenure	No. Units	%	No. HR	HR %
Affordable	42	29	148	35
Private	102	71	271	65
Total	144	100	419	100

Table 2.2 Affordable Mix

Affordable	No. Units	%	No. HR	HR%
London Affordable Rent	13	31	48	32
London Living Rent	16	38	53	36
Shared Ownership	13	31	47	32
Total	42	100	148	100

Table 2.3 Mix of Unit Sizes

Occupancy	No. Units	%
1B2P	47	33
2B3P	35	24
2B4P	41	28
<i>Total 2 Bed</i>	<i>76</i>	<i>53</i>
3B4P	6	4
3B5P	6	4
3B6P	4	3
<i>Total 3 Bed</i>	<i>16</i>	<i>11</i>
4B6P	5	3
Total	144	100

- 2.29 170 car parking spaces are proposed within two levels of basement parking. 101 parking spaces will be dedicated to the residential units and 69 to the Class A1 foodstore. 192 cycle spaces will be provided: 165 for the residential units and 32 for Morrisons customers and staff. There is scope to extend the number of residential cycle spaces up to 244 should demand be identified (this will be monitored through the travel plan).
- 2.30 Amenity space is incorporated through the development in the form of two landscape decks (set behind the residential accommodation and sitting above the retail store and to the rear of the site serving to screen the store's delivery area from the flats above). The building elevations incorporate large glazed openings, inset balconies and a mix of materials in a contemporary arrangement creating a bold and visually dynamic façade.

Pre-Application Engagement

- 2.31 An extensive programme of consultation has been undertaken with key stakeholders and the wider community. This section provides details of the consultation undertaken with the London Borough of Hillingdon (LB Hillingdon) and the GLA as statutory consultees. A Statement of Community Involvement, prepared by Luther Pendragon, provides information on the consultation undertaken with key stakeholders and the local community during the design evolution of the proposed scheme.

Consultation with LB Hillingdon

- 2.32 Morrisons and Harbourside Investments Ltd originally met with LB Hillingdon in February 2017 to discuss a mixed use retail and residential scheme on the site. This included 198 units over 10 floors. The Council was pleased to see a Morrisons foodstore being reprovided, but raised some concerns over parts of the proposed massing. The Council advised it would like to see this development respond to the Council's future aspirations of regeneration of this section of the canal. It also stated that any impacts of overshadowing onto the neighbouring school should be assessed.
- 2.33 Following this initial meeting, Morrisons and Harbourside Investments Ltd instructed a team of consultants to prepare an amended scheme to take forward to planning. Subsequently a second pre-meeting was arranged for 22 February 2018. This was attended by Mandip Maholtra, (Strategic and Major Applications Manager), Richard Phillips (Case officer), Jonathan Webb (Urban Design Officer) and members of the development team. No formal written pre-application advice has been received, but informal comments were sent through from the design officer raising concerns over the height of the proposal.
- 2.34 Accordingly, the design team relooked at the proposals and removed two storeys from the proposed massing. A second meeting was arranged to discuss this on 3 July. Again, formal feedback is awaited.
- 2.35 The feedback received at both meetings has been taken on board during the finalisation of the proposed scheme.

Consultation Meeting with the GLA

- 2.36 A meeting was held with the GLA on 19th June 2019. The GLA officers were very supportive of the proposal, and considered the massing acceptable. It welcomed the redevelopment of this town centre site, especially given the introduction of Crossrail, and was pleased to see the provision of 35% affordable housing. At the meeting the GLA confirmed when assessing affordable housing it refers to habitable rooms, rather than units in line with its emerging London Plan policies.

3.0 **Relevant Planning Policy**

3.1 A full policy review has been undertaken as part of the preparation of this application. This section identifies the relevant planning policy and guidance at a national , strategic and local level relating to these proposals. Key policy considerations are identified at the end of this Chapter. The analysis of how the proposal relates to the key policies is set out in Section 4.

Statutory Development Plan

3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. At the present time, the Statutory Development Plan comprises:

- 1 The London Plan (Adopted 2016);
- 2 The LB of Hillingdon Local Plan Part 1 (Strategic Policies, adopted in 2012); and
- 3 The LB of Hillingdon Unitary Development Plan (UDP, adopted 1998, as Saved 2007).

3.3 Local Planning Authorities are required to review their plans to ensure consistency with the National Planning Policy Framework (NPPF). The NPPF advises that for the purposes of decision-taking, policies in the Local Plan should not be considered out-of-date simply because they were adopted prior to the publication of the NPPF (para. 213). Where there is inconsistency the NPPF should prevail.

3.4 Planning policies of particular relevance to the application are set out below.

The London Plan (March 2016)

3.5 The London Plan (LP) is the Mayor's spatial development strategy document. It is part of the development plan and is to be taken into account when planning decisions are taken across London.

3.6 The below policies from the London Plan are considered relevant:

- Policy 3.4 - Optimising Housing Potential
- Policy 3.5 - Quality and Design of Housing Developments
- Policy 3.6 - Children and Young People's Play and Informal Recreation Facilities
- Policy 3.8 - Housing Choice
- Policy 3.11 – Affordable Housing Targets
- Policy 3.12 - Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- Policy 4.7- Retail and town centre development
- Policy 5.2 - Minimising Carbon Dioxide Emissions
- Policy 5.3 - Sustainable Design and Construction
- Policy 5.6 - Decentralised Energy in Development Proposals
- Policy 5.7 - Renewable Energy
- Policy 5.9 - Overheating and Cooling
- Policy 5.12 – Flood risk management

- Policy 5.13 – Sustainable drainage
- Policy 5.21 Contaminated land
- Policy 6.3 - Assessing Effects of Development on Transport Capacity
- Policy 6.9 - Cycling
- Policy 6.12 - Road Network Capacity
- Policy 6.13 - Parking
- Policy 7.4 - Local Character
- Policy 7.5 - Public Realm
- Policy 7.6 – Architecture
- Policy 7.8 – Heritage Assets
- Policy 7.14 - Improving Air Quality
- Policy 7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes

LB Hillingdon: Local Plan Part 1 - Strategic policies (2012)

- 3.7 The Hillingdon Local Plan: Part 1- Strategic Policies is the key strategic planning document for Hillingdon and sets out the long-term vision and objectives for the Borough.
- 3.8 The following policies are also considered relevant for the proposal:
- Policy E5 (Town and Local Centres)
 - Policy H2 (Affordable Housing)
 - Policy HE1 (Heritage)
 - Policy BE1 (Built Environment)
 - Policy EM1 (Climate Change Adaptation and Mitigation)
 - Policy EM3 (Blue Ribbon Network)
 - Policy EM4 (Open Space and Informal Recreation)
 - Policy EM6 (Flood Risk Management)
 - Policy EM8 (Land, Water, Air and Noise)
 - Policy T1 (Accessible Local Destinations)

Unitary Development Plan - saved policies (1998, as Saved 2007)

- 3.9 Since its adoption, in 1998, the strategic policies have been replaced by the Local Plan Part 1 - strategic policies (2012) The remaining UDP policies have been saved, however these are due to be replaced by the emerging Local Plan Part 2 documents upon adoption.
- 3.10 The relevant 'saved' UDP policies are as follows:
- Design of New Development (Policies BE13 and BE14)
 - Residential Amenity (Policy BE19, BE20, BE21, BE23, BE24)
 - Town Centres (Policy BE26)
 - Canals (Policy BE31 and BE32)
 - Trees and Landscaping (Policy BE38, BE39)

- Noise (Policy OE1, OE3 and OE5)
- Housing Mix (Policy H4)
- Service Uses (Policy S6 and S7)
- Strategic, Major and Minor Town Centres (Policy S11)
- Car Parking (AM14, AM15 and AM16)
- Annex 1 requires the 2 cycle spaces are provided for all dwellings with two or more bedrooms.

Other Material Considerations

- 3.11 Other material considerations include guidance contained within national planning policy and local guidance. These are set out below.

National Planning Policy and Guidance

- 3.12 The National Planning Policy Framework 2018 (NPPF) sets out the overarching policy priorities for the planning system, against which local plans will be prepared and decisions made on planning applications.
- 3.13 The National Planning Practice Guidance (NPPG) provides specific guidance relating to various topics and how they relate to town planning. The purpose of the NPPG is to reinforce the policy intent as established by the NPPF in a manner that allows for more specific detail.

Local Planning Policy

Emerging Policy- Hillingdon Local Plan: Part 2 – Development Management Policies Revised Proposed Submission Version (October 2015)

- 3.14 LB Hillingdon is currently progressing its Local Plan Part 2, which comprises Development Management Policies, Site Allocations and Designations, and a Policies Map. Once adopted it will replace the saved UDP (2007) alongside the Local Plan Part 1- Strategic Policies.
- 3.15 The Council submitted the Local Plan Part 2 to the Secretary of State on 18 May 2018 to begin the examination in public. The Hearing sessions are due to begin on 7 August 2018.
- 3.16 Given the advanced stage of this plan, it is appropriate to give weight to these policies when determining this application in line with paragraph 48 of the NPPF.
- 3.17 We consider the relevant policies to be as follows:
- Policy DMTC 1 (Town Centre Development)
 - Policy DMTC 2 (Primary and Secondary Shopping Areas)
 - Policy DMTC 4 (Amenity and Town Centre Uses)
 - Policy DMH 2 (Housing Mix)
 - Policy DMH 7 (Provision of Affordable Housing)
 - Policy DMHB 1 (Heritage Assets)
 - Policy DMHB 3 (Locally Listed Buildings)
 - Policy DMHB 7 (Archaeological Priority Areas and Archaeological Priority Zones)
 - Policy DMHB 10 (High Buildings and Structures)
 - Policy DMHB 11 (Design of New Development)

- Policy DMHB 12 (Streets and Public Realm)
- Policy DMHB 14 (Trees and Landscaping)
- Policy DMHB 16 (Housing Standards)
- Policy DMHB 17 (Residential Density)
- Policy DMHB 18 (Private Outdoor Amenity Space)
- Policy DMHB 19 (Play Space)
- Policy DMEI 2 (Reducing Carbon Emissions)
- Policy DMEI 3 (Decentralised Energy)
- Policy DMEI 8 (Waterside Development)
- Policy DMEI 9 (Management of Flood Risk)
- Policy DMEI 10 (Water Management, Efficiency, and Quality)
- Policy DMEI 12 (Development of Land Affected by Contamination)
- Policy DMEI 14 (Air Quality)
- Policy DMCI 4 (Open Spaces in New Development)
- Policy DMCI 5 (Children's Play Areas)
- Policy DMT 1 (Managing Transport Impacts)
- Policy DMT 2 (Highways Impacts)
- Policy DMT 5 (Pedestrians and cyclists)
- Policy DMT 6 (Vehicle Parking)

Supplementary planning documents and guidance

3.18 A number of Supplementary Planning Documents (SPDs) have been produced by Hillingdon which are of some relevance to the proposals. These include:

- 1 Affordable Housing (SPD) (May 2006)
- 2 Noise (SPD) (May 2006)
- 3 Hillingdon Design and Accessibility Statement (SPD) (May 2006)
- 4 Planning Obligations (SPD) (July 2014).

3.19 The following Supplementary Planning Guidance documents prepared by the Mayor are also relevant:

- 1 Housing SPG (2016)
- 2 Affordable Housing and Viability SPG (2017)
- 3 Play and Informal Recreation SPG (2012).

Key Planning Issues

3.20 From analysis of the statutory development plan, national policy and the statutory tests it is considered that the following planning considerations represent the key policy issues against which the planning application should be considered, as set out below:

- 1 Principle of Development
- 2 Affordable Housing

- 3 Residential Standards
- 4 Design/Townscape
- 5 Residential Amenity
- 6 Heritage
- 7 Transportation and Parking
- 8 Environmental Considerations
- 9 Energy and Sustainability.

3.21 The following section assesses the proposals against these key planning policy issues.

4.0 **Planning Assessment of the Proposals**

- 4.1 This Section provides a comprehensive assessment of the proposed development having regard to the Development Plan policies and other material considerations outlined in Section 3.0 above.

Principle of Development

- 4.2 The site is a brownfield site, located within the primary shopping area of Yiewsley/West Drayton which is a Major Centre in the UDP (a District Centre in the London Plan). The London Plan (2.15) is wholly supportive of residential led mixed use redevelopments, as being proposed, acknowledging the contribution that these make towards the vitality and viability of town centres significantly boosting the supply of housing in London (para 3.18).
- 4.3 The proposed scheme would maintain an active frontage to the street with a foodstore (Class A1 use) at ground floor. The principle of retail floorspace in this location is acceptable, and promoted through Local Plan Policy E5 which reflects the NPPF's sequential approach to development (para. 87). Whilst we note there is a net loss of retail floorspace on the site, this reflects the inefficient layout of the existing Morrisons store. This includes surplus storage and back of house areas. Morrisons has confirmed that the new store, whilst smaller, will offer a similar product offer in a more efficient way and will provide a better shopping experience for its customers. The retail element of the proposals will positively contribute to the centre's vitality and viability in line with the aspirations of the NPPF (para. 85), Local Plan Part 1 Policy E5 and emerging Local Plan Part 2 Policy DMTC1. It is considered an appropriate scale in line with London Plan policy 4.7.
- 4.4 The provision of housing in town centres is encouraged through planning policies at all levels. One of the London Plan's priorities is maximising housing delivery while promoting high standards of design and environmental and social sustainability. Paragraph 85 of the NPPF states that residential development can play an important role in ensuring the vitality of centres where Councils should set out policies to encourage residential development on appropriate sites.
- 4.5 The London Plan has adopted a target-based housing strategy which imposes minimum housing target levels on each borough. The London Borough of Hillingdon has been set a minimum target of providing 5,593 net new dwellings over a ten year period from 2015-2025. Annualised, this is a target of 559 new dwellings per year. This is higher than the targets set by LB Hillingdon in its Local Plan Part 1 (Policy H1), which sets out that the Council will seek to meet and exceed its minimum strategic dwelling requirement of 4,250 dwellings, annualised at 425 dwellings per year, for the ten-year period between 2011 and 2021.
- 4.6 One of the London Plan's methods of achieving an increase in the London housing supply is to encourage and promote the inclusion and provision of residential dwellings in town centre locations. By allowing such areas to diversify and intensify their uses, town centres will be able to fully utilise their land whilst also ensuring they secure the vitality and viability of the centres. Policy 2.15 (Town Centres) of the London Plan particularly refers to the inclusion of 'high density, residential-led, mixed use' redevelopment in 'highly accessible' town centre locations.
- 4.7 The Mayor's Housing SPG also acknowledges that housing intensification within town centres should reflect the Plan's emphasis for mixed use development in these locations. It should support wider measures to revitalise high streets in London, helping to sustain their role as important community hubs with their own distinct local character and ensure their resilience in the face of long-term structural challenges.

- 4.8 The New London Plan emphasises further the role town centres (especially those which are accessible; PTAL rating 3 or higher) can play in delivering housing, and the Mayor is keen to ensure that boroughs optimise the potential for housing delivery on all suitable and available brownfield sites.
- 4.9 The Council expects housing to come forward within the borough as part of high quality mixed use development such as this, which makes better use of this brownfield land (Local Plan policy H1). The Morrisons' site is in an accessible location that is capable of supporting a high density development, particularly given the improved transport connections that will be achieved on the opening of Crossrail. Supporting this, Local Plan Part 1 paragraph 4.22 forecasts that Crossrail will be a catalyst for growth and regeneration in the Hayes and West Drayton Corridor (inclusive of Yiewsley and the Morrisons site) and that the three enhanced stations at Heathrow, West Drayton and Hayes will establish the area as a key transportation node in West London (see Table 5.3 Heathrow Opportunity Area - Future of Key Sub-Areas of Local Plan Part 1).
- 4.10 The principle of a retail and housing mixed use scheme in this town centre location is therefore considered entirely acceptable in principle, and accords fully with the statutory development plan.

Affordable Housing

- 4.11 The proposed development complies fully with the affordable housing requirements of the statutory development plan.
- 4.12 The proposals seek to maximise the provision of affordable housing on site in line with Local Plan Policy H2 and London Plan Policies 3.11 and 3.12.
- 4.13 35% of habitable rooms provided on site will be affordable. The application of affordable housing thresholds to habitable rooms rather than units was discussed during pre-application discussions with the GLA. It was advised that the Mayor is applying the policy within his emerging New London Plan to affordable housing provision. Emerging policy H6 recognises 35% affordable housing should be provided on sites such as this, and supporting text (para. 4.6.8) states that the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes.
- 4.14 We note in the LB Hillingdon SPD on Planning Obligations (2014) that the Council states that the minimum 35% level of provision will normally be assessed on the number of habitable rooms rather than the number of units, where this more appropriately delivers the highest acceptable proportion of affordable housing. This was also the approach accepted on the recent Comag scheme within Yiewsley.
- 4.15 In line with the Mayor's Home for Londoners SPG (2017), the provision of 35% affordable housing (without public subsidy) means the application would follow a 'Fast Track Route'. Accordingly, no viability information is required to be submitted at the application stage, and applications are subject to review mechanisms only if an agreed level of progress on implementation has not been achieved within two years of the permission being granted or as agreed with the LPA. This is reiterated through emerging London Plan policy H6.
- 4.16 The provision of affordable housing is therefore entirely consistent with the statutory development plan, and is a key benefit of the scheme.

Residential Standards

4.17 We discuss below how the proposals accord with the residential standards set out in Emerging Local Plan Part 2 and the London Plan.

a) Mix

4.18 London Plan Policy 3.8 and the Mayor's Housing SPG requires a mix of housing sizes and types to be incorporated into the development. The emerging Local Plan: Part 2 Policy DMH2 also requires a mix of housing units of different sizes in residential schemes to reflect the Council's latest information on housing need. The supporting text within the emerging Local Plan provides that one and two bedroom development will be preferable in town centre locations and accordingly 33% of the residential units proposed are one bed units and 53% are two beds. The remaining 14% will be three or four bed units. We note a similar mix of units was considered acceptable by Council officers in the Comag development on Tavistock Road (15% one bed, 76% two bed and 9% three bed).

4.19 The proposed mix of housing units is therefore considered acceptable in this town centre location, and in compliance with the statutory development plan.

b) Unit Size

4.20 Table 4.1 below identifies the size of the residential units and the London Plan proposed minimum space standards for new dwellings (London Plan Table 3.3).

Table 4.1 Residential Unit Sizes

Occupancy	Unit Size (sqm)	London Plan Standards (sqm)
1B2P	50-54.6	50
2B3P	61.2-76.7	61
2B4P	70-81	70
3B4P	79.2-79.6	74
3B5P	91.3	86
3B6P	96	95
4B6P	99.4-117.3	99

4.21 The above table demonstrates that the proposed residential units are in compliance with the London Plan space standards (Policy 3.5).

c) Density

4.22 The London Plan (Policy stipulates that development should optimise housing output for different types of location with the relevant density range shown in Table 3.2.

4.23 The site has the characteristics of an urban area: it is located within Yiewsley town centre (defined district centre in the London Plan).

4.24 On this basis the density matrix contained in Table 3.2 of the London Plan would suggest a range of 200-700 hr /ha for a site with a PTAL 3 and 4 (the site's current PTAL is 3 but it is expected to rise with the introduction of Crossrail).

4.25 The density for the scheme is 805 hr/ ha which is just above the density guidelines in the London Plan.

- 4.26 The scheme recognises that housing should be optimised on site in line with Policy 3.4 and Table 3.2 of the London Plan. The Mayor's Housing SPG provides guidance on how to apply Policy 3.4 and Table 3.2.
- 4.27 Para 1.2.8 states:
- "Policy 3.4 and Table 3.2 are critical in assessing individual residential proposals but their inherent flexibility means that Table 3.2 in particular should be used as a starting point and guide rather than as an absolute rule so as to also take proper account of other objectives, especially for dwelling mix, environmental and social infrastructure, the need for other land uses (e.g. employment or commercial floorspace), local character and context, together with other local circumstances, such as improvements to public transport capacity and accessibility. The London Plan is clear that the SRQ density matrix should not be applied mechanistically, without being qualified by consideration of other factors and planning policy requirements."*
- 4.28 It is clear from the above SPG extract that density is a starting point in the consideration of housing development and should not be applied as an absolute rule.
- 4.29 When considering density it is important to take into account public transport capacity, local context and character and other factors such as access to social infrastructure, open space and play provision. The high quality of the design as well as the amount and quality of landscaping provided at the development site ensures that the density of the development does not lead to the loss of environmental quality for existing and future residents.
- 4.30 The proposed residential units are in accordance with the internal space standards (discussed in detail above). The relationship of the development with the provision of open spaces and the physical local context has been a key consideration throughout the design of the development. The scheme causes no harm to neighbouring amenity and therefore the proposed density is acceptable in planning terms. It was also verbally accepted by GLA planning officers at the GLA pre-application meeting.

d) Landscaping/ Amenity

- 4.31 The scheme includes two landscaped areas at first floor level, and a landscaped garden at ground level to the western edge of the site. These are accessible amenity areas to all residents within the development. The garden area will include a children's playground and seating. The landscaped areas at first floor will include both grass and paved areas so all areas are accessible.
- 4.32 The total area of community amenity space provided by the podiums and garden is 2,163 sqm. This significantly exceeds the amount sought by the Mayor for this quantum of residential development as calculated using Play Space Requirement Calculator (in the SPG 2012). This states that the child yields for the development will be 32 children and therefore 324 sqm of play space will be required. Furthermore, all residential units have private amenity space (930 sqm in total) in accordance with the London Housing SPG.
- 4.33 In total, the communal and private amenity space amounts to 3,093sqm. We note this falls slightly short of LB Hillingdon's requirements as set out in emerging Local Plan Policy Part 2 (DMHB 18), but as it significantly exceeds that set out in the London Plan which is the current statutory development plan policy we consider it is acceptable. The provision of amenity space is good, and of high quality, in accordance with London Plan Policy 3.6.
- 4.34 An indicative landscaping plan is submitted with the application (drawing 2-130 rev. B). This provides suggested boundary treatments and planting to be incorporated into the scheme. The vision for the landscaping of the scheme is to provide a vibrant and

- 4.35 attractive piece of public realm in accord with London Plan Policy 7.5, UDP Policy BE38, Local Plan Part One policy BE1 and emerging Local Plan Part 2 policy DMHB 14.

Summary

- 4.36 In respect of residential standards in terms of unit mix, unit sizes, density, landscaping and amenity space, the proposed development complies with the provisions of the statutory development plan. In line with the guidance with the NPPF, the scheme will therefore provide a “better place to live” (para. 124).

Design/ Townscape

- 4.37 This sub-section assesses the proposed development against design policies at a national and local level. It demonstrates that the scheme will achieve a high standard of design. It has been sensitively designed with regard to the local townscape.
- 4.38 There are three elements of the built environment which need to be assessed as part of this application: design, townscape and visual impact. We deal with each below.
- 4.39 A significant level of detail on design and the built environment has been submitted with the application and we refer the reader to the Design and Access Statement and the Townscape and Visual Impact Assessment (TVIA) for a more detailed review of the key design principles of this scheme

a) Design

- 4.40 Good design is considered a key aspect of sustainable development which should contribute positively to making places better for people. The NPPF states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life (para 9 of the NPPF).
- 4.41 The redevelopment of this brownfield site is in accord with the sustainable aims of the NPPF. More specifically, the NPPF encourages positive planning to achieve good architecture, sympathetic to local character optimising the potential of the site to accommodate and sustain an appropriate amount and mix of development (para. 127).
- 4.42 The design of the scheme is explained in detail in the Design and Access Statement submitted with the application. This Section should be read in conjunction with this document.
- 4.43 The proposed development aims to rejuvenate this important part of the High Street by providing a new, improved Morrisons store at street level to create an active and stimulating frontage (as supported through London Plan Policy 7.4). It also aims to bring life and energy to the canal side along St Stephen’s Road by introducing residential accommodation and activity in a currently neglected section of the street scape. In line with Local Plan Part 1 Policy BE1, London Plan Policy 7.6 and emerging Local Plan part 2 Policy DMHB 11, the development achieves a high quality design and contributes to the public realm, enhancing the local distinctiveness of the area.
- 4.44 The façade of the building has been articulated so that the ground floor retail becomes the key feature of the building, and this is further emphasised by the incorporation of large cantilevered canopies at the shop entrances. This creates a strong, active frontage ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings, as sought through London Plan Policy 7.4.

- 4.45 The upper floors are broken down with rectangular projecting brick bays which take the rhythm of the adjacent shop along the High Street, harmonising with the street scene as required through saved UDP Policy BE13.
- 4.46 The layout of the development has been considered to have regard to the pattern and grain of existing spaces and streets. Whilst a much denser development than existing, it is complementary to the existing streetscape in terms of orientation, scale and proportion and mass (London Plan Policy 7.4).
- 4.47 The development will provide activity fronting on to the canal, and is exploring options to improve pedestrian linkages. The development will promote and contribute to the positive enhancement of the canal corridors within the Blue Ribbon Network, in line with Local Plan Part 1 Policy EM3.

b) Townscape and Visual Impact

- 4.48 A Townscape and Visual Impact Assessment (TVIA) has been prepared to accompany the planning application. This considers the townscape and visual effects arising from the application scheme. The report has been informed by the relevant planning context, best practice guidance, current townscape character assessments and heritage designations relevant to the consideration of townscape and visual matters.
- 4.49 In townscape terms, the TVIA has identified a moderate beneficial effect within local townscape arising from the benefits of the demolition of the detracting Morrisons food store with its blank façade, service yard and car park fronting St Stephen's Road and replacement with a high quality mixed-use scheme. Incorporating residential uses would make better use of the site, add to the vitality of the area, provide more active frontages and greater natural surveillance. The built form steps down to the north and is set back at roof level to reduce the scale and massing of development and respond to the existing context. The architectural treatment of the elevations provides further articulation of the scale through the pattern of fenestration, balconies, and materials. This breaks up the scale of the frontage and responds to the pattern of the street scene. The character of the townscape in the area is varied and is undergoing further change with new developments introducing apartment buildings up from five to eight storeys. The proposed scheme is compatible with the evolving character of the area and the site's town centre location.
- 4.50 The proposed development will only be seen along a relatively short stretch of the Grand Union Canal. The introduction of a taller building incorporating residential uses on St Stephen's Road will create a more visually interesting and appropriate frontage. The increase in scale and associated degree of enclosure would be more compatible with the existing character of the Canal in this location and the scheme would have a minor beneficial effect on the townscape character of the Grand Union Canal.
- 4.51 There would be a negligible effect on the townscape role of local landmark buildings within the townscape such as St Matthew's Church and the Former Town Hall due to the alignment of High Street and intervening buildings.
- 4.52 With regard to visual impacts, views of the proposed development would be relatively localised with views of development along a short stretch of High Street, a short stretch of the Grand Union Canal and along St Stephen's Road with only very limited glimpsed views from the wider area including from West Drayton Station, crossing the bridges over the Grand Union Canal and at the northern end of Yiewsley Recreation Ground.
- 4.53 The scheme would replace the existing Morrisons food store, which lacks any visual interest, with a well-designed building that draws reference in its form and composition from the

apartment buildings surrounding context and the vertical rhythm of the adjacent parade of shops. The proposals create an improved frontage along the High Street, St Stephen's Road, and the Grand Union Canal through the enclosure of the parking and servicing within the building and the proposed new facades having greater visual interest. Visual effects range from moderate beneficial along High Street to minor beneficial along the Grand Union Canal, crossing bridges and at West Drayton Station. The increased visibility of the scheme would enhance the legibility of Yiewsley town centre in the surrounding area.

4-54 The appearance of the Site and surrounding area will be enhanced in all views assessed.

4-55 The TVIA concludes that the development complies with the statutory development plan in design terms.

- 1 The design of the scheme responds positively to local character and distinctiveness with facades, details and materials that reference existing apartment buildings and the vertical emphasis of the facades of the adjacent parade of shops. The scale is appropriate to the location along the canal and the stepping of the built form at roof level and to the north enables an appropriate relationship to adjacent buildings on High Street. A high-quality building is proposed which would improve an area of poor existing environmental quality by creating better defining the streets it adjoins, providing more active frontages and screening unattractive service areas and parking which are currently prominent in the street scape. The details and materials complement local architectural character, particularly projecting brick bays, inset top floors and ground-floor retail units. The scheme is consistent with policies London Plan 3.5 and 7.4, NPPF para 127a and c; Hillingdon Local Plan Part 1 Policy BE1 and DLP D1 in this regard.
- 2 The proposal is of a suitable high standard of architecture and urban design in terms of layout and form articulated through the creation of a semi-perimeter block with active frontages onto the street and an enclosed amenity space to the rear. The development reflects the role, scale, and character of the town centre with a ground-floor retail unit and residential units above which helps to harmonise with the existing streetscene. The proposed development therefore complies with policies LP 7.6; Local Plan Part 1 policies BE13, BE26; NPPF para 127; emerging Local Plan Part 2 policies DLP D2; DHLP2 DMP DMHB 10, DMHB 11; NPPF Para 126.
- 3 While the HTCS suggests that buildings over four storeys are tall in the wider Hillingdon context, the proposed development is of similar scale to the apartment buildings to the south its scale is considered appropriate in this context and within Yiewsley Town Centre, appropriately reflecting its role. It would enhance legibility particularly from West Drayton Station, an important arrival point and positively define the junction of St Stephen's Road and High Street with the new store entrance and building above creating a new focal point within the local streetscape. The scheme complies with national, London and local policy in this regard.
- 4 The proposed development has a relatively localised visual role. The visual assessment confirms that it would not mar the skyline or unacceptably intrude into local views consistent with Local Plan Part 1 policy BE36.
- 5 The development positively addresses the canal providing a new active frontage of appropriate scale and character along St Stephen's Road compatible with policy Local Plan Part 2 policy BE32.
- 6 The development optimises the use of land and is wholly appropriate for the Site's town centre location compatible with policy at all levels.

- 4.56 The application will deliver the regeneration of a site which currently detracts from the local townscape. The application proposal will result in a notable enhancement of the site, including new active frontages and passive surveillance of the High Street and St Stephen's Road. The proposal is of a high architectural quality and responds well to the local character, scale, and architectural details evident on the High Street and Grand Union Canal. The scheme optimises the use of the site and will act as a marker for the town centre in more distant views.
- 4.57 The proposal will have a beneficial effect on the character and appearance of the local townscape.

Summary

- 4.58 In respect of overall good design of new proposals the NPPF places an important emphasis on this. The design of the scheme is significantly improved over the existing building on the site, and will preserve the surrounding townscape and representative views. It therefore represents high quality design which is promoted by the statutory development plan policies.

Residential Amenity

- 4.59 The scheme has been designed to preserve the residential amenity of both the existing residents within the area affected by the development, and residents who would occupy the development once built. This sub-section deals with how this is relation to noise and daylight/ sunlight issues.

a) Noise

- 4.60 The development has considered the impacts of noise in line with London Plan Policy 7.15. This requires development to mitigate and minimise the existing and potential adverse impacts of noise and vibration. This policy relates to impacts on the development itself from existing sources, or that which it might generate either on or off-site.
- 4.61 Local Plan part 1 Policy EM8 promotes noise reduction and seeks to ensure that noise sensitive development is only permitted if noise impacts can be adequately controlled and mitigated. This is also supported by Saved UDP Policies OE1, OE3 and OE5.
- 4.62 A Noise Assessment, prepared by Sharps Redmore, has been submitted to accompany the planning application. This assessment considers both the impact of existing noise on the proposed residential properties and the impact of the proposed ground floor commercial use on existing/proposed residential properties.
- 4.63 It is concluded that the noise generated from existing sources (traffic generated noise) would not cause significant disturbance, subject to good acoustic design measures, to the proposed future residents.
- 4.64 In terms of noise impacts from the development, planning conditions have been recommended to control noise impacts caused from any mechanical services use and noise from the commercial use. The proposed store will be served by a fully enclosed delivery area, unlike the existing store, which will reduce the noise impact from delivery activity on existing residential properties.
- 4.65 In light of this recommendation, it is concluded that the scheme is compliant with the policies within the Statutory Development Plan. It also complies with the guidance within the NPPF which seeks to ensure that new development is appropriate for its location taking into account the likely effects of living conditions as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

b) Daylight and Sunlight

- 4.66 The London Plan addresses the residential amenity effects of development. Policy 7.6 states that proposals for buildings should, amongst other things, *“not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate”*. Amenity in this case is considered to include access to adequate daylight and sunlight.
- 4.67 Policy 11 (‘Design of New Development’) of the Local Plan: Part 2 states that *“development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space”*. The document also explains:
- “The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) “Site layout planning for daylight and sunlight: A guide to good practice”.*
- 4.68 A Daylight and Sunlight Assessment has been prepared by Lichfields to accompany the planning application. This is based on the methodology and guidance outlined by the BRE guide.
- 4.69 This assessment notes that the proposed development is located within the West Drayton area which is currently undergoing some change with the introduction of new developments. The proposed development’s intention has been to remedy and mitigate where possible against lower levels of natural light across the proposed units, as well as within the immediate neighbouring residential accommodation, while responding to the emerging urban character of the area and ensuring that the site is efficiently utilised to deliver much needed housing in the Borough.
- 4.70 The results of the assessment demonstrate that the neighbouring residential accommodation and the proposed residential units will receive good levels of daylight and sunlight following construction of the proposed development, while the proposed amenity spaces will be well sunlit throughout the year. While the assessment has shown that the development will result in some deviation from the BRE guidelines in relation to neighbouring residential flats, the effects are typical of development projects in a fast-growing high-density urban area.
- 4.71 In conclusion, the proposed development will not give rise to any materially unacceptable daylight and sunlight effects in the context of the site, emerging urban character of the area, BRE guidelines and relevant planning policy.

Heritage Considerations

Archaeological Considerations

- 4.72 The NPPF states that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk -based assessment and, where necessary, a field evaluation (paragraph 189).
- 4.73 Local Plan Part 1 Policy HE1 seeks to conserve and enhance the borough’s historic assets, including archaeologically significant areas. This is supported by Emerging LP Policy DMHB 1

(Heritage Assets). Saved UDP Policy BE3 requires sites of archaeological interest to be investigated and recorded, wherever possible.

4.74 Accordingly, an Archaeological Desk-Based Assessment has been prepared by CgMs Limited in accordance with policy requirements. This desk-based assessment has established that no designated archaeological assets are present within the study site or 500m search area.

4.75 The site is located within a wider Archaeological Priority Zone (APZ). However, given the small scale of the site and extent of previous development, this concludes that it is unlikely that any surviving archaeological remains would make a significant contribution to the heritage value of the APZ. The development is therefore considered to comply with the relevant policies outlined above.

Above Ground Heritage Assets

4.76 Policy 7.4 of the London Plan states that buildings, streets and open spaces should provide a high-quality design response that is informed by the surrounding historic environment.

4.77 LP Policy HE1 states that the LPA will conserve and enhance Hillingdon's environment, settings, and wider historic landscape. This includes the Grand Union Canal, designated heritage assets, and locally recognised heritage features including locally listed buildings.

4.78 There are no conservation areas in Yiewsley with a limited number of listed buildings in the surrounding area. The closest listed building is the Grade II listed De Burgh Arms Public House, which is situated c. 175m south of the site, and dates originally from the 16th century. The Railway Arms Public House is also Grade II listed as is located c. 230 m south of the site. Further details of which can be found in the supporting Townscape and Visual Impact Assessment, prepared by Lichfields.

4.79 In addition, there are several locally listed buildings on High Street, including the Former Town Hall and the Church of St Matthews.

4.80 The application proposal will result in a notable enhancement of the site, including new active frontages and passive surveillance of the High Street and St Stephen's Road. The proposal is of a high architectural quality and responds well to the local character, scale, and architectural details evident on the High Street and Grand Union Canal in accordance with LP Policy HE1.

4.81 It is concluded that there would be a negligible effect on the townscape role of local landmark buildings such as St Matthew's Church and the Former Town Hall due to the alignment of High Street and intervening buildings. The setting of these listed buildings are therefore preserved, in compliance with the statutory development plan, and the statutory tests set out in Section 72 of Planning (listed Buildings and Conservation Areas) Act 1990.

Transportation

4.82 In accordance with the NPPF (2018), developments proposals that raise transport issues should assess the likely impacts of the proposal on the highway network (para. 102). A Transport Assessment prepared by Redwood Partnership is submitted alongside the planning application.

4.83 Local Plan Part 1 Policy T1 and emerging Local Plan Part 2 Policy DMT 1 requires that all developments encourage access by sustainable modes and include good cycling and walking provision. The development site is located within an accessible location being close (approximately 250m) to West Drayton railway station. Once London Crossrail works are complete and the Elizabeth route opens fully, up to six Elizabeth line services an hour will serve West Drayton Station, allowing passengers to travel to Central London and Reading. The site is

easily accessible to local bus services being well within the 400 m recommended walk distance of bus stops.

- 4.84 At present, the site has a PTAL rating of 3. However, it is understood that this rating may increase to a 'good' PTAL score, reflecting the increased rail services to be provided on the opening of the Crossrail network. The existing and planned improvements to public transport in the area will help to contribute towards a shift towards more sustainable means of transport over the lifetime of the development, in line with policy objectives.
- 4.85 Emerging Local Plan part 2 Policy DMT 2 notes that new developments are required to mitigate against travel impacts. The development proposals will result in a reduction in the size of the existing Morrisons food store by 50%. As a result, the overall impact of the development in the local area is considered to be beneficial with no severe impacts. To provide a robust test of the capacity of the highway network adjacent to the Site, an unlikely assessment has been made assuming 100% new residential traffic flows added to the existing increased base traffic flows but with no reduction in Morrisons traffic flows. The nearby junction of High Street/St Stephen's Road still operates within capacity under all traffic scenarios even with the robust but unlikely scenario of increased base traffic with new residential traffic and no reduction in Morrisons traffic in Year 2023.
- 4.86 The transport impacts of development are therefore acceptable in line with London Plan policy 6.3 and 6.12, and no mitigation measures are required as promoted through emerging Local Plan Part 2 Policy DMT2.
- 4.87 In terms of parking, the proposed Morrisons car park will provide a total of 69 customer parking spaces. This is between the range suggested by both the emerging Hillingdon car parking guidance (Emerging Local Plan Part 2 Policy DMT 6 and Appendix C) and the London Plan 2016 (Policy 6.13) and is therefore considered to be compliant.
- 4.88 A total of 101 residential parking spaces are proposed at a ratio of 0.72 spaces per unit. This is appropriately below both Hillingdon Council's and the London Plan's maximum car parking standard and is therefore compliant with both these standards. Census data shows that for apartment owners in Yiewsley the car ownership ratio is lower at 0.59. Therefore, based upon Yiewsley's car ownership census data for households living in apartments we consider a proposed parking ratio of 0.72 will satisfy car ownership demand in this location.
- 4.89 Cycle parking is sought through London Plan policy 6.9 and emerging Local Plan Part 2 Policy DMT 5. The proposals include infrastructure for a total cycle parking provision of a minimum of 165 cycles in accordance with the cycle parking standards. Internal cycle storage rooms are provided in each of the three residential cores which will have a total capacity for 244 cycles.
- 4.90 The proposals therefore allow for the future expansion of cycle storage from the initial 165 spaces up to a maximum 244 spaces with future demand monitored within the Residential Travel Plan.
- 4.91 In conclusion, the proposed development will accord with relevant policies at a national, regional and local level, being fully compliant with policy objectives.

Environmental Considerations

- 4.92 In this sub-section we assess how the proposed development protects and enhances the natural environment in respect of arboriculture, ground conditions, flood risk and air quality.

a) Arboriculture

- 4.93 Saved UDP Policy BE38 and BE39 focus on the importance of tree preservation, with development proposals being expected to provide an accurate tree survey to show how proposals affect any existing trees. This is reiterated through emerging Local Plan Part 2 Policy DMHB 14.
- 4.94 Pursuant to LBH's policy requirements, an Arboricultural Report has been prepared by Tim Moya Associates to assess the trees in relation to the proposed development.
- 4.95 The report has concluded that the proposed development will not require the removal of trees that are of significant value within the surrounding local area. Tree removals have been restricted to those that are of low and poor quality, small in size and growing within restricted locations. The two large moderate quality London plane trees are successfully retained, being incorporated within the design proposals.
- 4.96 The loss of trees will have a negligible impact on the character and appearance of the surrounding landscape. It is considered that the retention of the two London plane trees will significantly enhance the visual appearance of the new development. The report also notes that although the landscape design does not include a large number of tree planting within prominent locations, it does create high quality amenity spaces that includes an array of planting at different levels which will improve local biodiversity.
- 4.97 All retained trees can be adequately protected by the recommendations set out in the method statement at Appendix A of the report and controlled by suitably worded planning conditions.
- 4.98 The proposal is therefore considered compliant with the relevant development plan planning policies.

b) Ground Conditions/Contamination

- 4.99 The NPPF confirms that planning decisions should ensure that a site is suitable for its proposed use taking into account of ground conditions and any risks arising from contamination (para 178).
- 4.100 London Plan Policy 5.21 states that development of brownfield land should not result in harm to human health. The policy states that appropriate measures should be taken to prevent the risk of activating or spreading contamination. Emerging LP Policy DMEI 12 confirms that proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants.
- 4.101 A Preliminary Risk Assessment has been prepared by WSP, to develop a preliminary conceptual site model identifying and evaluating potential ground contamination risks. The report has also provides a preliminary assessment of geotechnical risks associated with the proposed development.
- 4.102 It is concluded that the preliminary risk assessment indicates generally a low to moderate risk to human health, controlled waters and site structures.
- 4.103 WSP advises that a Phase 2 ground investigation is undertaken to identify the potential for below ground obstructions, unexploded ordnance and sort/compressible ground, which can be dealt with by condition. The NPPF notes it is the responsibility of the development to ensure a safe development with regard to contamination, and it is considered that appropriate conditions can be attached to a permission to ensure this.

c) Flood Risk and Drainage

- 4.104 The development site lies within Flood Zone 1, with a low risk of annual fluvial flooding. Local Plan Policy EM6 (Flood Risk Management) directs new development away from Flood Zones 2 and 3. London Plan Policy 5.12 and Emerging Local Plan Part 2 Policy DMEI 9 require development proposals to take flood risk into account and reduce the risk of flooding, make appropriate provision for flood risk mitigation.
- 4.105 The site is located entirely within Flood Zone 1, the area of the least risk of flooding. It is therefore considered a preferred location for new development.
- 4.106 The site size is below 1 hectare and accordingly a Flood Risk Assessment is not required (NPPF, para. 163). Notwithstanding this, a Flood Risk Assessment and Drainage Strategy has been submitted to accompany the application. As the proposed development being in Flood Zone 1, specific flood mitigation measures are not required.
- 4.107 With regard to drainage, LB Hillingdon requires all development to use sustainable urban drainage systems (SUDS) and will encourage these to be linked to water efficiency methods (Emerging Local Plan Part 2 Policy DMEI 10). This is reiterated through London Plan Policy 5.13. The proposed SUDS scheme comprises 1,000m² of blue green roofs to be installed on the first floor amenity decks, a restriction in run-off drainage from the roof and an increase in green landscaping (from approximately 1.5% to 15% of the site area).
- 4.108 Foul water from the development will drain into the public foul sewer network in which sufficient capacity has been confirmed by Thames Water.
- 4.109 Run-off will be disposed through either soakaway infiltration or through an outfall pipe into the Grand Union Canal (in consultation with Canal and River Trust). The preferred means of disposal of run off is through soakaway infiltration but the feasibility of this will need to be confirmed by appropriate testing.
- 4.110 Overall, it is considered that flood risk on the site and adjacent land will be reduced as a result of the increased green landscaping on the site and the SUDS measures that will be implemented. The proposal is therefore considered compliant with the relevant national and development plan planning policies.
- 4.111 The submitted Flood Risk Assessment and Drainage Strategy provides further information on this issue.

d) Air Quality

- 4.112 London Plan Policy 7.14 requires Boroughs to seek reductions in levels of air pollutants and states that major development should be at least air quality neutral and not lead to further deterioration of existing poor air quality. Development proposals are to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality.
- 4.113 Local Plan Part 1 Policy EM8 notes that “all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors”.
- 4.114 The site is located with an Air Quality Management Area, therefore an Air Quality Assessment (AQA) has been prepared by RPS.
- 4.115 The submitted AQA has considered dust effects during the construction phase of development. Impacts are predicted to be of a short duration and only relevant to the construction phases. The implication of recommended mitigation measures (set out in chapter 7 of the AQA assessment) will ensure that air quality impacts of construction and demolition will be minimised.

4.116 It is considered that the resulting air quality effect due to road traffic emissions is considered to be 'not significant' overall.

4.117 In line with policy requirements, the overall operational air quality impacts of the development are judged to be insignificant. It complies with the guidance in the NPPF that states planning decisions should not be adversely affected by unacceptable levels of air pollution (para. 170).

Energy/Sustainability

4.118 London Plan Policy 5.2 refers to minimising Carbon Dioxide Emissions and states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- 1 Be Lean: use less energy
- 2 Be Clean: supply energy efficiently
- 3 Be Green: use renewable energy

4.119 The London Plan (Policy 5.2) targets a 35% reduction in CO₂ emissions against the Building Regulations Part L 2010 baseline for non-residential buildings. Residential buildings are targeted to be Zero carbon from 2016, with zero carbon non-domestic buildings from 2019. LP Policy EM1 encourages the installation of renewable energy for all new development in meeting the carbon reduction target savings set out in the London Plan.

4.120 In line with the relevant planning policies and guidelines, the submitted Energy Strategy (produced by Watkins Payne) has adopted a hierarchical approach of using passive and low energy design technologies to reduce the baseline energy demand followed by the application of clean and low/zero carbon technologies.

4.121 Analysis has shown that by incorporating passive and low energy design measures there is a predicted reduction of 20.37% in the developments annual CO₂ emissions. A list of the proposed low energy design measures is set out in the supporting Energy Statement.

4.122 The assessment has looked at the incorporation of a decentralised energy network in line with London Plan policy 5.6 and concluded that there is sufficient demand within the development to justify the use of Combined Heat and Power (CHP). The potential renewable energy technologies have also been assessed, proposing to use photovoltaic cells and an air source heat pump system (London Plan policy 5.7).

4.123 By incorporating all of the above renewable energy technologies in addition to the clean/passive and low energy design measures there is a predicted further reduction of 30.81% of annual CO₂ emissions.

4.124 The overall energy strategy identifies a predicted annual carbon emission saving of 88.19 tonnes over the baseline scheme (without unregulated energy). The regulated annual carbon emission shortfall when compared to the zero-carbon target for the apartments and a 35% reduction for the retail unit is 103.51 tonnes CO₂. Allowing for an assumed 30 year duration for the development services this equates to a cumulative shortfall of 3105.3 tonnes of CO₂. It was concluded that this is the maximum saving achievable given the constraints of the site and agreed building form.

4.125 The development incorporates sustainable design and construction methods. In regards to overheating. The energy strategy show that the apartments assessed meet the overheating criteria in all of the bedrooms which are the principal concern related to occupant health and well-being (London Plan policies 5.3 and 5.9).

Concluding Remarks

- 4.126 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The provision of a residential led mixed use scheme is in accord with the statutory development plan; policy at all levels recognises the benefits such schemes bring to town centres. Therefore the proposed uses must be supported in principle unless material considerations indicate otherwise; there are none in this case.
- 4.127 As we have demonstrated in this section, all other aspects of the application proposals fully accord with the statutory development plan, and other material considerations. The development will directly respond to all three dimensions of sustainable development, as identified within the NPPF (paragraph 8) as summarised below.
- **Economic role:** the development will contribute to and enhance the role of Yiewsley town centre by promoting a mixed-use retail and residential scheme on this currently under-used site on the High Street.
 - **Social role:** The proposed development will provide a high quality retail and residential mixed use scheme which will serve the needs of the community and visitors to Yiewsley.
 - **Environmental Role:** The proposed development protects and enhances both the natural and built environment. It responds positively to its built context and preserves the character and appearance of Yiewsley and the setting of adjacent heritage assets.
- 4.128 In accord with the above, the development is “sustainable development”. At the heart of the NPPF is a presumption in favour of sustainable development. For decision making this means approving developments proposals that accord with the development plan (such as this) without delay (paragraph 11).

5.0 Conclusions

- 5.1 The proposed residential led mixed use scheme at the Morrisons site in Yiewsley represents a significant investment in Yiewsley town centre. The uses proposed are all appropriate town centre uses and, in line with national and local policy objectives, will enhance the vitality and viability of Yiewsley town centre and help contribute to the borough's need. It will also deliver a significant level of affordable housing.
- 5.2 There are no issues or impacts arising from the various technical analyses undertaken which give rise to any planning concerns.
- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the statutory development plan unless material considerations indicate otherwise. As we have demonstrated in this Planning Statement, the application proposals fully accord with the statutory development plan. There are no material considerations which otherwise indicate that this application shouldn't be determined favourably.
- 5.4 There is a presumption in favour of sustainable development as set out in the NPPF. The development will give rise to significant economic, social and environmental benefits and is therefore sustainable. In accordance with the requirements of the NPPF, this development, which complies with the development plan, should be approved without delay.

Bristol

0117 403 1980
bristol@lichfields.uk

Cardiff

029 2043 5880
cardiff@lichfields.uk

Edinburgh

0131 285 0670
edinburgh@lichfields.uk

Leeds

0113 397 1397
leeds@lichfields.uk

London

020 7837 4477
london@lichfields.uk

Manchester

0161 837 6130
manchester@lichfields.uk

Newcastle

0191 261 5685
newcastle@lichfields.uk

Thames Valley

0118 334 1920
thamesvalley@lichfields.uk