

# PLANNING AND AFFORDABLE HOUSING STATEMENT

In respect of

**Mixed-use Redevelopment to Provide a Replacement Morrison's Store  
and 158 Residential Dwellings**

At

**41-67 High Street, Yiewsley, West Drayton, UB7 7QQ**

On behalf of

**Harbourside Investments Limited and WM Morrison Supermarkets PLC**

JCG26116  
Final  
13 June 2023

## PLANNING STATEMENT

Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
Final	Planning Application	NS	PA	PA	13.06.23

## Approval for issue

PA	13 June 2023
----	--------------

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

### Prepared by:

**RPS**

Nasrin Sayyed / Paul Aldridge  
Senior Planner / Planning Director

20 Farringdon Street  
London, EC4A 4AB

T +44 20 3691 0500  
E [nasrin.sayyed@rpsgroup.com](mailto:nasrin.sayyed@rpsgroup.com) /  
[aldrige@rpsgroup.com](mailto:aldrige@rpsgroup.com)

### Prepared for:

**Harbourside Investments Limited and WM  
Morrison Supermarkets PLC**

10 Albemarle Street, London. W1S 4HH

## Contents

1	INTRODUCTION .....	1
2	FACTUAL BACKGROUND .....	3
3	SCHEME DEVELOPMENT AND PRE-APPLICATION ENGAGEMENT .....	7
4	THE PROPOSED DEVELOPMENT .....	13
5	PLANNING POLICY CONTEXT .....	18
6	PLANNING ASSESSMENT .....	27
7	PLANNING OBLIGATIONS AND CONDITIONS .....	47
8	CONCLUSION .....	48

## 1 INTRODUCTION

- 1.1 This Planning and Affordable Housing Statement has been prepared on behalf of Harbourside Investments Limited and WM Morrison Supermarkets PLC ("the Applicants") in support of a detailed planning application for the redevelopment of 41-67 High Street, Yiewsley, West Drayton, UB7 7QQ ("the Site"), for a replacement foodstore together with 158 residential dwellings.
- 1.2 The proposed description of development is:
- "Phased demolition of existing buildings and the redevelopment of the Site for a replacement foodstore (Class E); 158no. residential dwellings (Class C3), car parking, servicing and access arrangements and associated works."*
- 1.3 The application site is situated with Yiewsley town centre and comprises a former Morrison's store which forms part of designated retail frontage to the High Street. The Morrison's store closed in August 2021. Morrison's remain committed to opening a new store on the site to serve the local community.
- 1.4 The site previously benefitted from planning permission (reference 2370/APP/2018/2793 dated 21st August 2019) for a replacement Morrison's supermarket together with 144 residential apartments. Subsequently, the scheme was amended by a planning permission granted on 8th October 2020 on appeal under section 73 (reference 2370/APP/2019/2880) These permissions were granted subject to various conditions and legal agreements.
- 1.5 Information to discharge a number of pre-commencement conditions was submitted, and conditions were discharged, over the period January 2021 to May 2022. Notwithstanding this, the planning permission was not implemented and lapsed in August 2022.
- 1.6 The current proposals provide a revised scheme of development against a background of challenges to redevelop the site, as presented by the prevailing economic climate including increased build costs and regulatory controls including changes to building regulations.
- 1.7 The revised scheme presents an opportunity to positively respond to these challenges, in doing so these proposals enable:
- the delivery of an increased number and types of residential apartments (158 apartments)
  - provision of separate service and customer/residential vehicle access arrangements
  - surface level residential car parking
  - changes to the energy and performance of the building
  - building regulation compliance including fire safety
  - creation of a large multi-function central amenity deck set above the service yard and
  - a quality replacement foodstore (1,847.6sqm GIA) that reflects Morrison's latest requirement for this town centre location.
- 1.8 Further details of the proposed scheme are provided within Section 4 of this Statement and the submitted Design & Access Statement.
- 1.9 Pre-application consultation on the revised scheme of development has taken place with the Council's planning officers and the local community. Officers and the local community remain supportive of the principle of redevelopment of the site for mixed retail and residential use.
- 1.10 A summary of the key issues and challenges is outlined within Section 5 of this Statement.
- 1.11 This Statement should be read in conjunction with the submitted scheme drawings and the following reports:
1. Accommodation Schedules and Proposed Schedules, prepared by Hester Architects
  2. Air Quality Assessment (including Air Quality Neutral calculations), prepared by RPS
  3. Arboricultural Assessment, prepared by Tim Moya Associates

## PLANNING STATEMENT

---

4. Archaeological Assessment (report dated July 2018 prepared by CgMs and reports dated December 2020 and January 2022 by Pre-Construct Archaeology)
5. Circular Economy Statement (including GLA Template, Pre-Demolition Audit, Whole Life Carbon Assessment and Waste Management Plan), prepared by Watkins Payne
6. Daylight, Sunlight & Overshadowing Assessment, prepared by Consil
7. Delivery and Servicing Plan, prepared by Redwood Partnership
8. Draft Construction Management Plan (Method Statement), prepared by Deacon & Jones
9. Design & Access Statement and Tall Building Assessment, prepared by Hester Architects
10. Flood Risk and Drainage Strategy and Drawing 10-4897-SK500, prepared by Ward Cole
11. Energy Assessment, prepared by Watkins Payne
12. External Lighting Assessment, prepared by Watkins Payne
13. Financial Viability Assessment, prepared by JLL
14. London Plan Fire Statement and Planning Gateway One Fire Statement, prepared by BB7
15. Geo-environmental site appraisal and remediation method statement, prepared by RSK
16. Landscape Arrangement and Urban Greening Factor, prepared by Enplan
17. Topographical Survey, prepared by Greenhatch Group
18. Noise Assessment, prepared by Sharps Redmore
19. Overheating Analysis, prepared by Watkins Payne
20. Ventilation and Extraction Statement, prepared by WPP
21. Statement of Community Involvement, prepared by Luther Pendragon
22. Sustainability Statement, prepared by Watkins Payne
23. Townscape and Visual Impact Appraisal, prepared by Lichfields
24. Transport Assessment, prepared by Redwood Partnership
25. Travel Plans (Residential and Morrison's), prepared by Redwood Partnership
26. Utilities Statement, prepared by WPP
27. Water Efficiency Assessment, prepared by Watkins Payne

1.12 The remainder of this Planning Statement is organised as follows:

- Section 2: Factual Background
- Section 3: Scheme Development and Pre-application Engagement
- Section 4: The Proposed Development
- Section 5: Planning Policy Context
- Section 6: Planning Assessment
- Section 7: Planning Obligations and Conditions Section 8: Conclusion

## 2 FACTUAL BACKGROUND

### The Site

- 2.1 The application site comprises 0.52 hectares. The site has an active frontage to the High Street within Yiewsley town centre. West Drayton train station is situated approximately 200 metres to the south of the site. The site has a public accessibility level (PTAL) of 3.
- 2.2 The site comprises a Morrison's foodstore, which ceased trading in August 2021 together with customer car parking and servicing arrangements. The store comprises 5,480sqm (GIA) provided over basement (2,140sqm); ground floor (2,444sqm) and first floor (896sqm) levels. The total sales area of the store is 1,557sqm.
- 2.3 The Morrison's store is a red brick building with a green steel structure on the top level, fronting Yiewsley High Street. The site contains a service yard and car park to the rear. There are approximately 114 car parking spaces split over the surface and basement levels access to which is from St Stephen's Road which forms the southern boundary of the site.

### The Surrounding Context

- 2.4 The immediate surrounding area, particularly Yiewsley High Street comprises of a mix of commercial uses mainly located at ground floor level, including high street shops and services, beyond which the area is characterised by residential dwellings. Yiewsley High Street contains various shops on the ground floor of the properties with residential use above.
- 2.5 The area to the northwest of the site is mainly occupied by St Matthews Church of England Primary School and the locally listed building, the Church of St Matthew (ref. 288) – situated some 70m north of the site.
- 2.6 To the south of the site is Art Wood Apartments, which is a 5 storey building, whereas, to the north of the site is a three storey building with retail, fast food shops and salon on the ground floor.
- 2.7 The Grand Union Canal is located to the south of St Stephen's Road.
- 2.8 There are no statutory listed buildings located within the immediate vicinity of the site. However, Church of St Matthews is locally listed.
- 2.9 There area is served by a range of modes of public transport including GWR and Elizabeth Line train services from West Drayton station providing connections to and beyond central London via Paddington and to the west towards Reading. There are also a number of local buses services which operate along the High Street. Further details regarding the connectivity of the local area are provided in the Transport Assessment.

### Planning History

- 2.10 The application site has a long history of use as a foodstore which stems back to 1982. The table below summarises the relevant planning history for the site. The key applications are highlighted in **bold**.

**Table 1 Planning History**

Ref.	Proposal	Decision/ Decision Date
2370J/81/1399	Erection of retail store including general offices together with parking and service facilities.	Approved 29.01.1982
2370/APP/2008/3520	Extension works to accommodate a new access stair and lift with a link corridor across the roof, demolition of existing fire escape stair and bridge link to first floor office space, increase size of canopy at customer entrance.	Approved 23.02.2009

## PLANNING STATEMENT

2370/APP/2009/25	Removal of condition 10 (office floor space to comprise not less than three individual suites of offices, each not more than 120m <sup>2</sup> ) of planning permission ref. 2370J/81/1399 dated 29/01/82: Erection of retail store including general offices together with parking and service facilities.	Approved 16.03.2009
2370/APP/2008/3565	Internal refurbishment of store including 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; Renewal of plant at roof level and installation of new roof edge protection.	Approved 17.03.2009
2370/APP/2009/1005	Details in compliance with conditions 6 (Survey Plan), 7 (Trees, Hedges and Shrubs to be retained), 8 (Site Clearance or Construction Work), 9 (Landscape Scheme) and 10 (Hard and Soft Landscaping) of planning permission ref: 2370/APP/2008/3565 dated 17/03/2009.	Approved 07.07.2009
<b>2370/APP/2018/2793</b>	Demolition of the existing buildings and the redevelopment of the site to provide a part 4 to part 8 storey building comprising a replacement Class A1 1,643sq.m (GIA) foodstore, 144 residential units, basement car parking and associated works.	Approved 21.08.2019
<b>2370/APP/2019/2880</b>	Minor material amendment to revise Conditions 2 (Approved Plans), 3 (Approved Documents) and 7 (Landscaping Scheme) of planning permission ref: 2370/APP/2018/2793, dated 21/8/19: Demolition of the existing buildings and the redevelopment of the site to provide a part 4 to part 8 storey building comprising a replacement Class A1 1,643sq.m (GIA) foodstore, 144 residential units, basement car parking and associated works to allow the removal of the lower basement car park level and reconfiguration of the upper level basement car park layout, involving a reduction in the number of car parking spaces for the residential units from 101 to 23 spaces and additional off-site highway improvement works on St Stephen's Road.	Refused 17.03.2020  <b>Appeal (ref. APP/R5510/W/20/3250434)</b> allowed on 08.10.2020
2370/APP/2021/74	Details pursuant to Condition 34 (Overheating Modelling) of the Planning Inspectorate's decision letter dated 08-10-2020, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Undecided
2370/APP/2021/207	Details pursuant to Condition 29, Parts (i) (a) and (b) only (Details of Remediation Scheme) of the Planning Inspectorate's decision letter dated 08-10-2020, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Approved 03.03.2021
2370/APP/2021/66	Details pursuant to Condition 4 (Levels) of the Planning Inspectorate's decision letter dated 08/10/2020, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Approved 05.03.2021
2370/APP/2021/65	Details pursuant to Condition 20 (Archaeological Investigation) of the Planning Inspectorate's decision letter dated 08/10/20, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Approved 04.03.2021
2370/APP/2021/1092	Details pursuant to Condition 6 (Tree Protection) of the Planning Inspectorate's decision letter dated 08-10-2020, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Approved 29.04.2021

## PLANNING STATEMENT

2370/APP/2021/727	Details pursuant to Condition 31 (Sustainable Water Management Scheme) of the Planning Inspectorate's decision letter dated 08-10-2020, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Approved 29.07.2021
2370/APP/2021/949	Details pursuant to Condition 10 (Details of Privacy Screens / First Floor Amenity Areas Boundary Treatment) of the Planning Inspectorate's decision letter dated 08-10-2020, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Approved 12.11.2021
2370/APP/2021/67	Details pursuant to Condition 5 (Materials and External Surfaces) of the Planning Inspectorate's decision letter dated 08/10/2020, Ref. APP/5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880).	Approved 12.11.2021
2370/APP/2022/878	Details pursuant to Condition 20 (Details of Stage 1 Written Scheme of Archaeological Investigation (WSI)) of the Planning Inspectorate's decision letter dated 08-10-2020, ref. APP/5510/W/20/3250434 (LPA ref. 2370/APP/2019/2880).	Approved 09.05.2022
2370/APP/2021/887	Deed of Variation to amend Schedule 2 (Affordable Housing) of the Section 106 Agreement dated 20th August 2019 (as revised by a Deed of Variation dated 11th August 2020) in association with planning permission ref: 2370/APP/2018/2793 dated 21/8/19 (Demolition of the existing buildings and the redevelopment of the site to provide a part 4 to part 8 storey building comprising a replacement Class A1 1,643sq.m (GIA) foodstore, 144 residential units, basement car parking and associated works), as amended by S73 granted permission by Planning Inspectorate's decision letter dated 8th October 2020, Ref. APP/R5510/W/20/3250434 (LPA Ref. 2370/APP/2019/2880), namely to revise the Affordable Housing Tenure Split and modify the 'Mortgagee in Possession' clause.	No further action 12.09.2022

- 2.11 Planning permission was granted in August 2019 for the redevelopment of the site for a replacement foodstore together with 144 residential apartments (2370/APP/2018/2793). The scheme included two levels of basement car parking, with 101 residential and 69 retail car parking spaces.
- 2.12 Subsequently, an application was submitted under Section 73 (2370/APP/2019/2880) to amend the approved scheme of redevelopment to omit the second level of basement car parking, reducing the number of residential car parking spaces from 101 to 23. The application sought to address the viability of the scheme given increases construction costs. The reduction in basement car parking was supported by the Mayor of London.
- 2.13 The application was refused by a decision notice dated 17th March 2020 for two reasons; impact on the highway and failure to provide a Deed of Variation to secure contributions previously agreed in respect of the redevelopment of the site. An appeal was allowed on 8<sup>th</sup> October 2020 (APP/R5510/W/20/3250434) subject to conditions and a legal agreement.
- 2.14 A number of pre-commencement conditions attached to the appeal decision were subsequently discharged, including:
- Condition 4 – Details of Levels
  - Condition 5 – Materials and External Surfaces
  - Condition 6 – Tree Protection
  - Condition 10 – Details of Privacy Screens
  - Condition 20 – Archaeological Investigation / Stage 1 WSI
  - Condition 29, part (i) and (a) and (b) – Details of Remediation Scheme
  - Condition 35 – Sustainable Water Management Scheme

## PLANNING STATEMENT

---

2.15 Both original and S73 permissions lapsed in August 2022, given escalating costs associated within demolition and construction works, pending the submission of a revised scheme of development for the site.

### **Summary**

2.16 The principle of redevelopment for a mixed use scheme comprising a replacement foodstore and residential apartments has been established by the previously consented schemes. The latest proposals represent a revision to those schemes and specifically address the associated issues regarding viability whilst also providing an opportunity to embrace improvements in terms of design and the range and number of residential apartments in a sustainable location.

### **3 SCHEME DEVELOPMENT AND PRE-APPLICATION ENGAGEMENT**

- 3.1 This section summarises the consultation undertaken by the Applicant with the council's officers as part of pre-application discussion as well as engagement with the local community.
- 3.2 The proposed scheme of development for the site has been worked up having regard to comments received from officers and the local community.
- 3.3 The revised scheme of development is necessary to address the increased costs associated with implementing the previous schemes of development. The planning permissions for those previous schemes have since lapsed and Morrison's have closed their store pending the redevelopment of the site for a replacement foodstore. Morrison's remain fully committed to opening a new store on the application site.
- 3.4 The latest proposal addresses the viability of the previous schemes through changes to construction methods and materials, and respond positivity to requirements of building regulations including fire safety, energy use and sustainability.
- 3.5 The latest proposals also provide an increased number of residential apartments (including larger apartments suitable for families) as well as improvements to the design that enable separate service and customer/ residential vehicular access and parking arrangements and the creation of a large, shared amenity deck. The provision of a quality modern replacement foodstore for occupation by Morrison's is maintained.
- 3.6 Taken together these changes will ensure a high-quality scheme of development consistent with those previously approved as well as ensuring the necessary scheme viability.

#### **Pre-application Advice**

- 3.7 The Applicant applied for pre-application advice from the Council for the revised scheme of development in July 2022 comprising a replacement foodstore and 145 residential apartments. A pre-application meeting was held between the Applicant and the Council in August 2022.
- 3.8 The rationale for the revised scheme was discussed with the Council's officers against a backdrop of rising costs which meant the consented scheme was no longer viable to implement and consequently the previous planning permission had lapsed. The latest schemes seek to address such matters through changes to construction materials and methods.
- 3.9 During the design development of the revised proposals, ways to improve the composition and appearance of the scheme were also explored. This included breaking down the massing through the creation of a central podium; increasing the separation between the proposed building and that of its neighbours and the provision of dedicated residential/customer and service vehicle accesses with a fully enclosed service yard. The design and layout of the proposed Morrison's foodstore has also been updated to reflect the retailer's requirements to provide a better customer experience and to reflect prevailing retail trading conditions and innovations.
- 3.10 During the pre-application officers confirmed:
- The principle of development is supported.
  - Engagement with the local community is important.
  - Highways and transport issues would be important considerations in light of the proposed changes to the access arrangement and a requirement to maintain the package of measures included as part of the previously consented scheme of redevelopment.
  - The provision of additional homes suitable for families was a requirement.
- 3.11 Following the pre-application meeting with officers, revisions to the proposed scheme were submitted in October 2022.
- 3.12 The key changes included an increase in the number of residential apartments from 145 to 158, addressing the need for further homes suitable for families. This was principally achieved by increasing the height of the building by one storey. There were also corresponding changes to the design and layout of the scheme.

## PLANNING STATEMENT

---

- 3.13 The Council's formal written pre-application advice was received on 23<sup>rd</sup> February 2023. A summary of the main issues are provided below.

### Principle of Development

- 3.14 The principle of development was considered against the housing mix and the re-provision of the retail store. The written advice notes that the principle of redeveloping the site for a mixed use residential and retail scheme has already been established through the previous original and amended permissions.
- 3.15 In terms of the housing mix, the advice refers to London Plan policy H10 and Local Plan policy DMH 2 which require the provision of a mix of housing units of different sizes. The London Plan also outlines that this should be informed through a number of factors including local evidence of need. Similarly, policy DHM 2 requires proposals to reflect the Council's latest information on housing need. Supporting paragraph 4.6 of the Local Plan highlights the Council's need for larger affordable and private market units, particularly those comprising three bedrooms.
- 3.16 The initial pre-application submission presented 8 apartments, split as 6no. 3 and 2no. 4 bed apartments. However, following concerns raised during the meeting, the revised scheme increased the number of 3 bedrooms to 18 apartments. In comparison, the previously consented scheme provided 21 three bed apartments. Officers noted that the previous schemes were approved prior to the adoption of the Local Plan Part 2, which includes policies encouraging a higher proportion of family apartment. In this respect officers considered that the proposal should achieve at least 20% family sized apartments. The proposals comprise 17% family accommodations (by habitable rooms).
- 3.17 In terms of the level of affordable housing provision, it was noted that this will be informed through a Viability Assessment however options presented in line with the Council's affordable housing tenure split of 70% social and 30% intermediate should be presented. It was also highlighted that it may be beneficial to propose options with 100% social rent and 100% intermediate housing. The Statement together with the submitted Financial Viability Assessment considers the viability of the scheme including the proposed residential mix and affordable housing.
- 3.18 In terms of the retail re-provision, it was highlighted that the size of the retail unit should not be less than previously approved unless this could be justified.

### Design

- 3.19 In terms of the design, there was no objection to the separation of the proposed building into two distinct blocks, which helps reduce massing. It was noted that this would provide better definition of the main blocks and allow greater light penetration to the residential flats.
- 3.20 Concern was raised regarding the loss of the previously consented 3no. duplex apartments proposed at ground level and replacement with a service store access and plant room. However, it was considered that the loss of the three apartments outweighs the benefits of separating the building into two independent blocks.
- 3.21 Concerns were expressed relating to the increased height of the High Street frontage of the proposed main building. It was highlighted that the previously consented scheme was already much taller than the surrounding buildings. The additional storey and increase in slab level would increase the height by approximately 4.63m along the High Street. It was acknowledged that setting the building back from the boundary of the High Street does assist in terms of reducing the bulk of the additional storey. The increase in height for Block C is 1.27m.
- 3.22 It was advised that engagement with the local community should be conducted. It was also outlined that the proposed height may also have implications for the airport and aviation safety and it was advised that contact is made with NATS and the aerodrome safeguarding authorities. In this respect, the previous consented schemes included a condition relating to bird hazard management in accordance with comments raised by Heathrow Airport Limited.
- 3.23 Officers suggested that any balconies remain as discrete as possible on the High Street frontage.
- 3.24 The submitted Design and Access Statement considers matters relating to the proposed design of the scheme. Together with the Townscape and Visual Impact Assessment and the Sunlight and Daylight Assessment they consider the effects of the proposed design upon adjacent occupiers and townscape.

## PLANNING STATEMENT

---

- 3.25 In relation to trees and landscaping, it was highlighted that an Arboricultural Report will be required. Attention was also drawn to the requirements of Local Plan policy DME1 which states that major proposals should incorporate living roofs / walls or an off site contribution be provided if this is not appropriate. The scheme should also achieve an Urban Green Factor target score of 0.4 in accordance with the London Plan policy G5.

### Amenity

- 3.26 In relation to amenity, officers considered that the proposed changes would result in some benefits through an improved relationship between the proposed building and the neighbouring properties, with the notable exception being the proposed increase in height on the High Street frontage.
- 3.27 Concern was expressed in relation to the residential properties on the upper floors on the opposite side of the High Street and the potential for cumulative impacts.
- 3.28 The proposed residential apartments would need to satisfy the national space standards and comply with the standards specified within the London Plan policy D6 in regard to minimum bedroom and balcony sizes.
- 3.29 In terms of the external amenity space, it was highlighted that the proposed scheme presented would result in a shortfall of 682sqm of amenity space required to accord with the Local Plan policy DMHB 18, with the scheme providing 81% of the required amenity space and would need to be justified.
- 3.30 In terms of child play space, the London Plan policy S4 and the Local Plan policies DMCI 5 and DMHB 19 require 10sqm of play space to be provided for each child. It was highlighted that the GLA Population Yield Calculator will be used to calculate the yield of the children generated from the proposed development, requiring a corresponding measure of play space. Provision of this should be sought on-site in the first instance. However, if this is not achievable then a financial contribution could be provided.
- 3.31 The relocation of the child play space from the rear of the site into the central podium was considered to provide greater convenience and natural surveillance. However, this would need careful consideration in terms of noise mitigation to minimise disturbance to adjoining residents.
- 3.32 Due to the site context, it was advised that the requirement for a new or enhanced open space would be best undertaken through an off-site contribution.
- 3.33 The application is supported by a Design and Access Statement, a Tall Building Assessment (provided as part of the Design and Access Statement) and a Townscape Visual Impact Assessment (TVIA). These documents duly assess the quality and quantity of the proposed amenity space, effect of the scheme in terms of amenity of adjacent occupiers and townscape.

### Highways

- 3.34 It was highlighted that “car free developments” should be a starting point. However, no objection has been raised to the level of revised car parking proposed.
- 3.35 It was also outlined that proposals should ensure that for 3% of dwellings, at least 1 designated disabled parking bay is provided for each dwelling. For the proposals, 5 no. disabled spaces would be required. There is an additional requirement to demonstrate how an additional 7% of dwellings could be provided with one disabled parking bay. For the proposals, 11 no. further disabled spaces would be required if the current accommodation is insufficient.
- 3.36 20% of parking spaces would require active electric vehicle charging provision (5no. spaces in total), with the remaining spaces having passive provision. The retail element is required to provide 14no. active charging points.
- 3.37 Cycle parking provision to the residential element of 279 no. long stay spaces and 5no. short stay spaces was considered acceptable. Confirmation is required for the retail element which should provide 9no long-stay spaces and 22no. short stay spaces. It was also advised that changing room / shower facilities should be provided for staff members wishing to cycle to work.
- 3.38 In terms of refuse and recycling collection, the proposals would need to demonstrate there are no barriers (e.g. raised kerb) to collection. Details of how collection will take place will be required and all domestic bin stores must allocate space for food waste recycling.
- 3.39 A number of other requirements were also outlined, including those relating to visibility splays, accessibility, drop off points, types of pavers, means of escape and landscape strategy.

## PLANNING STATEMENT

---

- 3.40 These matters are considered and addressed by the submitted Transport Assessment and Delivery and Service Plan.
- 3.41 In lieu of residential parking space being provided, consistent with previously consented schemes, the Highway Authority requires the applicant to commit to a covenant restricting future residents to apply for on street residential car parking permits.

### **Other**

#### Energy

- 3.42 The proposals are required to comply with the London Plan policy SI 2 and Local Plan policy DMEI 2, which have regard to net zero-carbon. If net zero cannot be delivered on site, the Council will seek an off-site contribution, in consideration of the increased cost of carbon offset payments. The submitted application is supported by a range of documents which examine the effects of the proposals from an energy and carbon perspective.

#### Flood Risk

- 3.43 It was noted that the pre-application submission highlighted that the decrease in basement area would allow for a more sustainable solution in terms of the proposed drainage strategy.
- 3.44 The proposed scheme will need to demonstrate the SuDS features incorporated; how temporary measures will be implemented to ensure no increase in flood risk from commencement of construction and long term management and maintenance of the drainage system. The submitted Flood Risk and Drainage Strategy duly addresses these matters.

#### Crime Prevention

- 3.45 The pre-application advice makes reference to the Council's latest guidance on Secured by Design Principles – where relevant these should be included within the Design & Access Statement. The proposed development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating a number of specific measures.

#### Contamination

- 3.46 The Council's Contamination Officer advised that similar conditions would be attached as per the previous consents to any new approval in respect of site investigation and remediation.

#### Air Quality

- 3.47 The proposed development is required to show compliance with the London Plan policy SI 1 and Local Plan policies EM8, DMEI 14 as well as the London Borough of Hillingdon Local Action Plan 2019-2024.
- 3.48 It was highlighted that the Focus Areas are defined as places where pollution levels are already elevated and therefore improvements are required. The proposed development is required to demonstrate it is at least air quality neutral and given the site's location within the Yiewsley Air Quality Focus Area, an air quality positive approach is required to be demonstrated.
- 3.49 These matters are duly considered by the submitted Air Quality Assessment including Air Quality Neutral Assessment.

#### Fire Safety

- 3.50 Officers drew attention to the requirements of London Plan policy D12, which require a Fire Statement. The application proposals are supported by a London Plan Fire Statement and Planning Gateway One Fire Statement which demonstrate compliance with the policy.

#### Planning Obligations and CIL

- 3.51 The pre-application advice makes reference to a potential requirement for a legal agreement to cover certain contributions and obligations as well as the community infrastructure levy. This Statement duly provides an outline of the Head of Terms for a legal agreement, based upon the agreements relating to the previously consented schemes of redevelopment for the site.

### **Community Consultation**

- 3.52 A public exhibition was held on 8th December 2022 between 4pm-8pm at St Matthew's Church, High Street, Yiewsley, UB7 7QH.

## PLANNING STATEMENT

---

- 3.53 A Statement of Community Involvement (prepared by Luther Pendragon) has been submitted in support of this application which highlights details of the community engagement strategy and the consultation process.
- 3.54 The general feedback from the public exhibition was largely positive albeit there were some concerns expressed regarding the scale and design of certain aspects of the scheme. The main comments are summarised as follows: In summary, the:
- Residents gave positive feedback on the separation of the residential car park and the Morrison's foodstore car park as well as separate access arrangement for delivery vehicles.
  - Some residents expressed their desire to see the Morrison's return as quickly as possible given previous frequent use and enquired about how the new shop will look.
  - Residents enquired about what the new homes will look like, how many there would be and more detail about the rooms themselves.
  - Attendees were very positive about Citygrove's commitment to community engagement and the extent to which residents' input was being sought.
  - Insufficient resident and customer car parking spaces
  - Height of the proposed development
  - The proposed block fronting the high street has a monolithic mass and is out of scale, character and overbearing, and dominant to the streets scene
  - Development does not provide sufficient family homes of 3 or more bedrooms;
  - The proposal has unacceptable internal flat arrangements
  - Impact on the daylight / sunlight to the new dwellings
  - Only a minority of flats would benefit from views to the Canal and majority would face the High Street.
  - There were a range of views expressed on the overall architectural style of the building.
  - Local residents sought reassurance that disruption during construction would be minimised, and some were pleased to hear that equipment will be fitted with silencers wherever possible and working hours for construction works will be restricted to those permitted by the local authority.

### **Greater London Authority (GLA)**

- 3.55 The previously consented schemes for the redevelopment of the site were supported by the Mayor of London albeit that they were mainly considered against the policies of the then London Plan 2016. The amended scheme (allowed on appeal) was also considered and supported by the Mayor, including against the policies of the Intend to Publish version of the London Plan, which was subject to some amendments, was taken forward and adopted as the London Plan 2021.
- 3.56 The latest proposals represent a further 'revision' to the previously consented scheme of development for the site (albeit to be secured via a new planning application as opposed to an application made under section 73). Accordingly, the Applicant has not specifically sought at this stage to engage in pre-application discussions with the GLA.
- 3.57 Nevertheless, the proposals have been fully assessed against the policies of the London Plan 2021.

### **Summary**

- 3.58 The principle of the proposed development remains that same as the previously consented schemes, namely residential led mixed use development comprising a replacement foodstore and residential apartments.
- 3.59 Following consultation and engagement with the council officers and the local community, the proposals have been further refined. Changes to the design of the scheme have also been informed by a range of technical reports that are submitted in support of this application. Full details of the proposals are shown on the submitted drawings and the approach to scheme design is described

## **PLANNING STATEMENT**

---

within the Design and Access Statement. The next section of this Statement provides a summary of the proposals as submitted for planning permission.

## 4 THE PROPOSED DEVELOPMENT

### Introduction

- 4.1 The application proposals seek the redevelopment of the site for a residential led mixed use scheme including a replacement high quality and modern Morrison's foodstore.
- 4.2 The proposed description of development is:  
*"Phased demolition of existing buildings and the redevelopment of the Site for a replacement foodstore (Class E); 158no. residential dwellings (Class C3), car parking, servicing and access arrangements and associated works."*
- 4.3 The full extent of the proposals are shown on the submitted scheme drawings and described within the accompanying Design & Access Statement.
- 4.4 The proposed development will be implemented two phases (as shown on the submitted phasing plan), to assist in the future viability of the scheme.
- 4.5 Phase one will comprise the demolition of existing buildings and site clearance works and excavation of the basement. Phase two will comprise construction of the proposed buildings. In this way the Applicant is seeking a phased approach to CIL payments to assist the viability and deliverability of the scheme.
- 4.6 In summary, the proposed development will provide the following:
- A high quality replacement foodstore operated by Morrison's: The proposed foodstore, including its associated warehouse, plant and preparation rooms will all be located on the ground floor of the proposed building. The total proposed floorspace of the foodstore is 4028.2sqm (GIA), including the basement parking area. Excluding the basement parking, the proposed area is 1,847.6sqm (GIA), which includes 1,109.5sqm (NIA) of sales area. A total of 64 car parking spaces (including disabled, parent & toddler and electric vehicle charging points space provision) will be provided within the basement to serve the store. The store will maintain a prominent, attractive and active frontage to the High Street and provide an anchor foodstore to the benefit of local residents. The store will help promote the vitality and viability of Yiewsley town centre.
  - 158 residential apartments: A mix of 1, 2 and 3 bed residential apartments will be provided on the mezzanine and 1<sup>st</sup> – 7<sup>th</sup> floor levels, comprised within two blocks with amenity space provided in the form of private balconies and a shared communal podium and deck. A total of 22 residential car parking spaces (including disabled provision) will be provided. The total proposed floorspace of the residential element is 13,101.1sqm (GIA), of which 9,822.89sqm is comprised of individual residential apartments, 3,070.81sqm communal residential areas and 207.4sqm plant room.

### Key Changes From the Previously Consented Scheme

- 4.7 **Table 2** below provides a summary of the key changes proposed by the current application as compared to the previously consented scheme.

**Table 2: Summary of Key Changes**

Element	Previously Consented Scheme	Proposed Scheme	Difference
Building Height:			
High Street elevation (Block A&B)	23.7m (53.8 AOD)	28.3m (58.41 AOD)	+4.6m
St Stephen's Road elevation (Block C)	25.7m (54.9 AOD)	26.97m (56.18 AOD)	+1.27m

## PLANNING STATEMENT

Foodstore Area			
Total (excluding basement and plant area)	1,643sqm (GIA)	1,672sqm (GIA)	+29sqm
Sales Area			
	1,064sqm(NIA)	1,109.5sqm (NIA)	+45.5sqm
<hr/>			
Number of Residential Apartments	144	158	+14
<hr/>			
Tenure Mix of Apartments	13no. London Affordable Rent 16no. London Living Rent 13no. Shared Ownership 102no. Private	158no. Private	-13no. LAR -16no. LLR -13no. SO +56no. Private
<hr/>			
Playspace Area	324sqm (useable area: 163.3sqm)	208sqm	+44.7sqm
<hr/>			
Shared Amenity Space (including children play space)	2,163sqm	2,075sqm	-88sqm
<hr/>			
Customer Car Parking	69	64	-5
<hr/>			
Residential Car Parking	23	24 (including two car club space)	+1
<hr/>			

- 4.8 The principle the proposed development nevertheless remains very comparable to the previously consented scheme of the redevelopment for the site.

### Scale and Layout

- 4.9 The proposal will provide a part-four, part-five, part-six, part-seven and part eight-storey mixed-use building, comprising of 1,847.6sqm (GIA) of retail floorspace, 158no. residential flats along with new areas of amenity and child play space, car and cycle parking and refuse storage.
- 4.10 The retail floorspace will be comprised within part basement and part ground floor adjacent to the High Street with residential apartments located on the upper floors to the front and to the rear elevated above the residential car park and access to the customer car park. A large podium area providing shared amenity space for the residents of the scheme is provided above and screens the service yard to the foodstore below. In addition, dedicated areas for cycle parking and refuse storage are provided.
- 4.11 The ground floor will comprise an active frontage to Yiewsley High Street, provided by the replacement Morrison's foodstore. All ancillary areas associated with the foodstore, including back of house area/ warehouse, preparation room and plant room will be at ground floor level.
- 4.12 The upper floors (mezzanine and floors 1 to 7) will provide the 158 residential flats, with a mix of 1, 2 and 3 bed apartments. The top floor (7<sup>th</sup> level) will be set back from the elevations. There will be three cores provided for access to the residential dwellings (Cores A, B and C). Core A is proposed on the northern area, Core B is proposed on the southern area, at the junction of the High Street and St Stephen's Road and Core C is proposed at the south-western area of the site, from St Stephen's Road.

## PLANNING STATEMENT

---

- 4.13 Secured cycle parking storage and refuse store will be provided within the ground floor of each Core. Each Core will also provide staircase as well as lifts.
- 4.14 The first floor will provide a shared amenity area and child play space in the form of a central communal podium / deck and one further amenity deck with a smaller floorspace. The main shared communal podium (amenity area) will be notable from the south-western elevation (from St Stephen's Road) and this will create an appearance of two independent blocks separated by the central podium. The total shared amenity space is 2,050.6sqm.
- 4.15 All residential flats will include private amenity space in the form of balconies.
- 4.16 A substation is located at the rear of the existing Morrison's store, which will be relocated adjacent to the Morrison's plantroom, set back from St Stephen's Road.
- 4.17 Vehicle access to the site will be via St Stephen's Road, located to the south-western boundary. Residential car parking will be provided at surface level. Retail customer car parking is provided at basement level.

### Residential Unit Mix

- 4.18 The proposed development will provide a total of 158 residential flats, with a mix of 1, 2 and 3 bed apartments.
- 4.19 The development will deliver 100% market level / private flats. The proposed apartment mix is summarised in the **Table 3** below.

**Table 3: Tenure Mix**

Type	Market / Total
1 bed	74
2 bed	66
3 bed	18
Total	158

- 4.20 143 dwellings will be M4(2) compliant and 15 dwellings will be M4(3) compliant. The latter equates to 9.5% being wheelchair accessible.

### Morrison's Foodstore

- 4.21 The proposed Morrison's foodstore will comprise of a total of 4,023.5sqm (GIA), which includes the basement area. Excluding the basement, the total area is 1,847.6sqm (GIA). The entire foodstore will be located on the ground floor, fronting Yiewsley High Street. The floorspace is split as follows (in NIA terms):
- Retail sales area: 1,109.5sqm
  - Warehouse: 359sqm
  - Food preparation area: 145.3sqm
  - Plant room: 174.5sqm

### Access

- 4.22 Pedestrian access to the Morrison's foodstore for customers arriving by foot is directly from Yiewsley High Street. Customers parking in the basement car park will enter the store via stairs/lifts provided which connect to the ground floor lobby.

## PLANNING STATEMENT

---

4.23 Pedestrian access to the residential dwellings is provided via three separate cores (A, B and C). Direct access to Core B is provided from St Stephen's Road, whereas access to Cores A and C will be via the car park area.

4.24 Vehicle access for both residential and the foodstore is proposed from St Stephen's Road. A separate access arrangements are proposed for the residential / customer parking and service vehicles is provided from St Stephen's Road.

### Car Parking

4.25 The proposed scheme comprises a total of 86 car parking spaces provided as a mix of surface level and basement car parking space. The scheme includes the provision of 2 car club parking spaces provided close to the access road.

4.26 No. 22 car parking spaces serve the proposed residential apartments. Comprising 18 standard car parking spaces (5 which will include electric vehicle charging points) and no.4 disabled car parking spaces. All residential car parking spaces will be provided as surface level, accessed via St Stephen's Road.

4.27 No. 64 car parking spaces will serve the proposed Morrison's foodstore provided at basement level. This includes 6no. disabled parking spaces, 2no. parent & toddler parking spaces and 3no. electric vehicle charging spaces (1 x active 22KW EVCP serving a single space and 1 x active rapid 150KW EVCP serving two parking spaces).

### Cycle / Motorcycle Parking

4.28 A total of no.282 cycle parking spaces will be provided around the three Cores, which meets the Council's minimum cycle parking requirements for the residential element.

4.29 Four motorcycle spaces will be provided within the basement car park for customers visiting the foodstore.

4.30 There are 22 cycle spaces dedicated for use by customers visiting the foodstore together with 10 cycle spaces for use by staff.

### Refuse Storage

4.31 The three cores will also accommodate refuse storage for the residential apartments. The three refuse storage areas will include access doors for easy collection from the Highway.

4.32 A temporary bin collection zone is indicated on the Waste Collection Strategy plan to facilitate waste collection from Core A. On collection days, bins will be moved from the refuse storage to the temporary zones by the management team to allow quick and easy collection.

4.33 Refuse from Cores B and C will be directly collected from the bin storage.

4.34 Refuse vehicles will stop on St Stephen's Road and the High Street.

4.35 The travel distance from the temporary collection zone / refuse storage to the refuse vehicles will not exceed 10m.

### Materials

4.36 The proposed materials are as follows:

- A mixture of dark brown and light buff bricks are proposed for the building as the main material on the upper floors; with grey / blue bricks on the ground floor;
- Metal balustrades are proposed for the balconies;
- Grey metal cladding is proposed to the windows and areas adjacent to the balcony doors; and
- Moss green cladding is proposed to the Morrison's shopfront;

### **Amenity Space**

- 4.37 The proposal incorporates a scheme of soft landscaping including boundary planting, communal residential amenity areas and child play space provision.
- 4.38 The total shared amenity space is 2,050.6sqm (which includes child play space).
- 4.39 Each residential apartment will benefit from private amenity space in the form of balconies.

### **Beyond the Red Line Boundary**

- 4.40 The proposed development also incorporates potential improvements to land outside the site area. This includes an informal access to the canal towpath adjacent to St Stephen's Road and a potential new path onto canal towpath. These proposals are shown indicatively on the submitted Proposed Site Plan. These proposals, like the previously consented scheme, could be secured by a S106 Agreement.

## 5 PLANNING POLICY CONTEXT

- 5.1 This section provides an overview of the key national, regional and local planning policies which are of relevance to the consideration of the proposed development.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.3 The Development Plan for the site comprises:
- The London Plan (2021);
  - Hillingdon Local Plan: Part 1 Strategic Policies (adopted 2012);
  - Hillingdon Local Plan: Part 2 Development Management Policies (adopted 2020);
  - Hillingdon Local Plan: Part 2 Site Allocations and Designations (adopted 2020); and
  - Hillingdon Local Plan: Part 2 Policies Map
- 5.4 Other Material Considerations includes:
- The National Planning Policy Framework (NPPF), updated in 2021;
  - National Planning Practice Guidance (PPG);
- 5.5 There are also a number of additional Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD) published by the GLA and the London Borough of Hillingdon, which provide guidance for development proposals such as these, including (but not limited to):
- GLA Housing SPG (2016)
  - GLA Affordable Housing and Viability SPG (2017)
  - GLA Shaping Neighbourhoods: Playspace and Informal Recreation SPG (2012)
  - GLA Circular Economy Statements (2022)
  - London Borough of Hillingdon Planning Obligations SPD (July 2014)
  - Hillingdon Local Plan Accessible Hillingdon SPD (September 2017)

### Site Designation

- 5.6 The application site is not allocated for a specific planning purpose on the policies map to the Hillingdon Local Plan. The site is situated within the defined town centre of Yiewsley, a preferred location for retail uses.
- 5.7 The site also falls within the Colne Valley Archaeological Priority Zone, Hillingdon's Air Quality Management Area and Yiewsley Air Quality Focus Area.
- The site is located within the Heathrow Opportunity Area within The London Plan (2021), which has an indicative capacity to accommodate 13,000 new homes and 11,000 indicative new jobs. The Opportunity Area forms part of the Heathrow/Elizabeth Line West Growth Corridor.

### Relevant Development Plan Policies

- 5.8 The relevant policies of the Development Plan applicable to the consideration of these proposals are listed below. Key policies (relating to the principle of development, housing, retail, town centre and design), are assessed within section 6 and 7 of this Statement.

#### The London Plan (2021)

- Policy GG1 - Building strong and inclusive communities
- Policy GG2 - Making the best use of land
- Policy GG3 – Creating a healthy City

## PLANNING STATEMENT

---

- Policy GG4 - Delivering the homes Londoners need
- Policy GG5 - Growing a good economy
- Policy GG6 – Increasing efficiency and resilience
- Policy SD1 – Opportunity areas
- Policy SD6 - Town centres and high streets
- Policy SD7 – Town centres: development principles and Development Plan documents
- Policy SD8 – Town centre network
- Policy D1 – London’s form character, and capacity for growth
- Policy D2 – Infrastructure requirements for sustainable densities
- Policy D3 – Optimising site capacity through the design-led approach
- Policy D4 – Delivering good design
- Policy D5 – Inclusive design
- Policy D6 – Housing quality and standards
- Policy D7 – Accessible housing
- Policy D8 – Public realm
- Policy D9 – Tall buildings
- Policy D10 – Basement development
- Policy D11 – Safety, security and resilience to emergency
- Policy D12 – Fire safety
- Policy D13 – Agent of change
- Policy D14 – Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H10 - Housing size mix
- Policy S1 - Developing London’s social infrastructure
- Policy S4 - Play and informal recreation
- Policy E9 – Retail, markets and hot food takeaways
- Policy E11 – Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy G1 - Green infrastructure
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodland
- Policy SI1 - Improving air quality
- Policy SI2 – Minimising greenhouse gas emissions
- Policy SI3 – Energy infrastructure

## PLANNING STATEMENT

---

- Policy SI4 – Managing heat risk
- Policy SI5 – Water infrastructure
- Policy SI6 – Digital connectivity infrastructure
- Policy SI7 – Reducing waste and supporting the circular economy
- Policy SI12 – Flood risk management
- Policy SI13 – Sustainable drainage
- Policy SI15 – Water transport
- Policy SI16 – Waterways – use and enjoyment
- Policy SI17 – Protecting and enhancing London’s waterways
- Policy T1 – Strategic approach to transport
- Policy T2 – Healthy streets
- Policy T4 – Assessing and mitigating transport impacts
- Policy T5 – Cycling
- Policy T6 – Car parking
- Policy T6.1 – Residential parking
- Policy T6.3 – Retail parking
- Policy T6.5 – Non-residential disabled persons parking
- Policy T7 – Deliveries, servicing and construction
- Policy T9 – Funding transport infrastructure through planning
- Policy DF1 – Delivery of the Plan and Planning Obligations

### Hillingdon Local Plan: Part 1 Strategic Policies (adopted 2012)

- Policy NPPF1 – National Planning Policy Framework – Presumption in Favour of Sustainable Development
- Policy E3 – Strategy for Heathrow Opportunity Area
- Policy E5 - Town and local centres
- Policy E7 – Raising skills
- Policy H1 – Housing growth
- 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
- Policy CI1 – Community infrastructure provision

### Hillingdon Local Plan: Part 2 Development Management Policies (adopted 2020)

- Policy DMTC1 – Town centre development

## PLANNING STATEMENT

---

- Policy DMTC2 – Primary and secondary shopping areas
- Policy DMTC4 – Amenity and town centre uses
- Policy DMH2 – Housing mix
- Policy DMH7 – Provision of affordable housing
- Policy DMHB1 – Heritage assets
- Policy DMHB7 – Archaeological Priority Areas and Archaeological Priority Zones
- Policy DMHB10 – High buildings and structures
- Policy DMHB11 – Design of new development
- Policy DMHB12 – Streets and public realm
- Policy DMHB13 – Shopfronts
- Policy DMHB14 – Trees and landscaping
- Policy DMHB15 – Planning for safer places
- Policy DMHB16 – Housing standards
- Policy DMHB17 – Residential density
- Policy DMHB18 – Private outdoor amenity space
- Policy DMHB19 – Play space
- Policy DMEI1 – Living walls and roofs and onsite vegetation
- Policy DMEI2 - Reducing carbon emissions
- Policy DMEI3 - Decentralised energy
- Policy DMEI7 - Biodiversity protection and enhancement
- Policy DME18 – Waterside development
- Policy DMEI9 - Management of Flood Risk
- Policy DME10 – Water management, efficiency and quality
- Policy DME12 – Development of land affected by contamination
- Policy DMEI14 - Air quality
- Policy DMIN4 – Re-use and recycling of aggregates
- Policy DMCI4 – Open spaces in new development
- Policy DMCI5 – Children's play areas
- Policy DMCI7 – Planning obligations and community infrastructure levy
- Policy DMT1 – Managing transport impacts
- Policy DMT2 – Highways impacts
- Policy DMT4 – Public transport
- Policy DMT5 – Pedestrians and cyclists
- Policy DMT6 – Vehicle parking
- Policy DMT7 – Freight

## National Planning Policy Framework

- 5.9 The NPPF sets out the economic, environmental and social planning policies for England. The NPPF is currently under review. Between 22 December 2022 and 2 March 2023 the Government consulted on proposed changes to the NPPF.
- 5.10 Paragraph 2 of the NPPF outlines that *"The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions".*
- 5.11 At the heart of the NPPF is a presumption in favour of sustainable development, and that development should be planned positively. In achieving sustainable development, three overarching objectives, which are interdependent are identified for the planning system; economic, social and environmental (paragraph 8).
- 5.12 Chapter 2 (Achieving sustainable development) of the NPPF highlights the importance of the planning system in achieving sustainable development, which involves achieving the three overarching objectives of providing an economic benefit, a social benefit and an environmental benefit. Paragraph 11 highlights that in terms of decision-making, a presumption in favour of sustainable development means *"(c) approving development proposals that accord with an up-to-date development plan without delay".*
- 5.13 Chapter 4 (Decision-making), states at paragraph 38 that *"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."*
- 5.14 Chapter 4 also touches on pre-application engagements and how the process has significant potential to improve the efficiency and effectiveness of a planning application for all parties.
- 5.15 Chapter 5 (Delivering a sufficient supply of homes) states at paragraph 60 that *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*
- 5.16 Paragraph 64 relates to affordable housing and states, *"To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount."*
- 5.17 Major developments are expected to deliver at least 10% of the total number of homes available to affordable home ownership, unless this would exceed the level of affordable housing required in the area.
- 5.18 Finally, paragraph 66 requires strategic policy-making authorities to establish a housing requirement figure for their whole area.
- 5.19 Chapter 6 (Building a strong, competitive economy) places a focus planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt.
- 5.20 Paragraph 81 notes that *"Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."*
- 5.21 Chapter 7 (Ensuring the vitality of town centres), highlights at paragraph 86 that *"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation."* It also goes on to say that *"planning policies should (f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites."* The NPPF confirms that town centres are the preferred location for main town centre uses including retail uses.
- 5.22 Chapter 8 (Promoting healthy and safe communities) places a focus on achieving healthy, inclusive and safe places, which promote social interaction; are safe and accessible; and enable and support healthy lifestyles.

## PLANNING STATEMENT

---

- 5.23 Chapter 9 (Promoting sustainable transport) outlines the role of transport in achieving sustainable development. Paragraph 105, states that “*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.*”
- 5.24 Paragraph 108 highlights that maximum parking standards should only be set when there is a clear justification that it is necessary for managing the local road network or for optimising the density of a development in locations which are well served by public transport.
- 5.25 Paragraph 111 adds that “*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*”
- 5.26 Paragraph 112 outlines that proposals should:
- a. give priority first to pedestrian and cycle movements;
  - b. address the needs of disabled people and those of reduced mobility;
  - c. create places which are safe, secure and attractive;
  - d. allow for the efficient access by services and emergency vehicles; and
  - e. be designed to enable charging of plug-in accessible and other ultralow emission vehicles in safe, accessible and convenient locations.
- 5.27 Paragraph 113 requires all development which would generate significant amounts of movement to be supported by a travel plan and a transport statement or transport assessment.
- 5.28 Chapter 11 (Making effective use of land) notes at paragraph 119 that “*planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses...*”. The paragraph highlights the need to make use of ‘brownfield’ land as much as possible.
- 5.29 Furthermore, paragraph 120 adds that “*planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; promote and support the development of under-utilised land and buildings, especially if this would help to meet identified need for housing...*”
- 5.30 Paragraph 124 of the NPPF states that “*planning policies and decisions should support development that makes efficient use of land, taking into account:*
- a) *the identified need of different types of housing and other forms of development;*
  - b) *local market conditions and viability;*
  - c) *the availability and capacity of infrastructure services;*
  - d) *the desirability of maintaining an area's prevailing character and setting; and.*
  - e) *the importance of securing well-designed, attractive and healthy places.*”
- 5.31 Chapter 12 (Achieving well designed places) establishes national policy guidance on the design of the built environment. Paragraph 126 states that good design is a key aspect of sustainable development.
- 5.32 Paragraph 130 states that planning policies and decisions should ensure that developments:
- a. Will function well and add to the overall quality of the area;
  - b. Are visually attractive, due to architecture, layout and landscaping;
  - c. Are sympathetic to the local character and history;
  - d. Establish and maintain a strong sense of place;
  - e. Optimises the site potential; and
  - f. Create places that are safe, inclusive and accessible.
- 5.33 Paragraph 131 outlines that “*trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change.*”

## PLANNING STATEMENT

---

- 5.34 Paragraph 132 emphasises the importance of considering the design of proposals throughout its evolution and that early discussions between the applicant, local authorities and community engagement will be looked on more favourably.
- 5.35 Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) requires the planning system to support the transition to a low carbon future, taking into account flood risk and coastal change. Planning should also help to contribute to radical reductions in greenhouse gas emissions.
- 5.36 Paragraph 157 states in determining planning applications, local authorities should expect new development to (a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant; and (b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 5.37 Paragraph 169 states that major developments should incorporate sustainable drainage systems unless clear evidence is provided that this would be inappropriate.
- 5.38 Chapter 16 (Conserving and enhancing the historic environment) states that heritage assets range from sites and buildings of local historic value to those of the highest significance. Paragraph 185 states that a positive strategy for the conservation of the historic environment should be set. Paragraph 189 then requires that applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. Paragraph 190 adds that local planning authorities should take into account the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.39 Paragraph 194 states *"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."*

## Supplementary Planning Guidance

### GLA Housing SPG (2016)

- 5.40 The Housing SPG considers mixed-use and large developments within section 7 of the document. It encourages mixed-use developments and provides guidance on the London Plan's approach to particular locations expected to provide substantial housing capacity and considered suitable for higher density, mixed use, residential-led development. This includes town centres, opportunity areas, large sites and housing zones.
- 5.41 The Guidance highlights that a mix of land uses, including residential accommodation, can contribute to the London Plan's objective to create more accessible, inclusive, 'lifetime neighbourhoods.'

### Town Centre Guidance

- 5.42 The Guidance outlines that *"As town centres are some of the most accessible locations in London, higher density housing provision in these areas will play a key role in addressing London's requirement for additional housing capacity...Boroughs should consider the scope to consolidate and strengthen centres by promoting their diversification, especially through high density, residential led, mixed use redevelopment."*
- 5.43 The Guidance goes on to add that *"High quality, locally sensitive design is essential to deliver successful higher density mixed use redevelopment in town centres. Residential-led mixed use redevelopment can have a number of positive impacts on town centre footfall, vitality and viability and can help to create a more attractive, safe and accessible environment, particularly in the evening."*

### Opportunity Area Guidance

- 5.44 In relation to Opportunity Areas, the Guidance highlights that *"Opportunity areas are focused on the capital's major areas of brownfield land with substantial capacity to accommodate new homes, jobs and commercial development. The London Plan outlines the Mayor's expectation for these areas to make a particularly significant contribution towards meeting the capital's housing need."*

### GLA Affordable Housing and Viability SPG (2017)

- 5.45 The Guidance highlights that the Mayor is committed to a long-term strategic aim of half of all new homes in London being affordable.
- 5.46 Proposals which do not meet the 35% affordable housing threshold or require subsidy to do so, will be required to submit a detailed viability information which will be scrutinised by the LPA and where relevant, the Mayor.
- 5.47 The SPG also refers to a cash-in lieu option which, in exceptional circumstances where affordable housing cannot be accommodated on site, it should be demonstrated robustly through detailed viability assessments as part of the justification that off-site or cash in lieu is acceptable.
- 5.48 The SPG outlines that *"In 2014, Government introduced a vacant building credit (VBC) which applies to sites where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building. The VBC reduces the requirement for affordable housing contributions based on the amount of vacant floor space being brought back into use or redeveloped."*
- 5.49 In terms of Opportunity Areas, the Guidance highlights that *"Opportunity Areas and Housing Zones are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. They are also of a scale that can create fundamentally new places and communities."*

### GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)

- 5.50 The Play and Informal Recreation SPG highlights acknowledges *"that in a densely developed, highly urbanised city like London, safe and stimulating play facilities are essential for a child's wellbeing, health and future development. Ensuring this is taken into account in planning and development through the London Plan has been a significant achievement of the London planning system, and will become of increasing importance with the emphasis in the new London Plan on encouraging lifetime neighbourhoods meeting the needs of all Londoners, at every stage of their lives."*
- 5.51 One of the challenges identified in providing free, inclusive and accessible play spaces for children and young people is that boroughs will need to find opportunities to retain and increase the provision of play and informal recreation, particularly in housing developments.
- 5.52 The Guidance outlines that distance is a key barrier to children's play. All children should have access to play space within reasonable and safe walking distance of their homes. The following table has been extracted from the document which shows the benchmark standards recommend in respect of different age groups.
- 5.53 The recommended approach to assessing the level of play provision required is based on the application of child occupancy rates, which will vary with the type of accommodation and in terms of dwelling size (usually measured as the number of bedrooms) and tenure. The GLA child yield formulae is used for calculating child occupancy in new development and determining play space.

### GLA Circular Economy Statements SPG (2022)

- 5.54 The Circular Economy Statement SPG highlights that proposed development are required to demonstrate how it will deliver the principles of circularity in accordance with the Guidance and Policy SI 7 of the London Plan (2021).
- 5.55 The six circular economy principles, which should be a fundamental part of the building design process are:
1. building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary
  2. designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials
  3. designing for longevity
  4. designing for adaptability or flexibility
  5. designing for disassembly
  6. using systems, elements or materials that can be reused and recycled

### London Borough of Hillingdon Planning Obligations SPD (July 2014)

- 5.56 The Hillingdon Planning Obligations SPD provides guidance on the use of planning obligations in Hillingdon. The document provides greater clarity on the likely type and scale of planning obligations and seeks to establish a transparent, fair and consistent process for negotiating, securing and monitoring.
- 5.57 Whilst the pre-application indicates the elements which will be secured through planning obligations, the SPD shows that as the proposed development involves more than 15 residential dwellings and non-residential floorspace of more than 1000sqm, the following planning obligations are likely to be secured to deliver the objectives of the key policies contained in the Hillingdon's Local Plan.
- Affordable housing – Local Plan policy H2
  - Travel plans – Local Plan policy T1
  - Site specific transport related works (calculated on a site by site basis) – Local Plan policy T1
  - Air quality improvements (only where there is a net increase in traffic based trips) – Local Plan policy EM8
  - Employment and training provision – Local Plan policy E7
  - Open space and recreation – Local Plan policy EM4

- 5.58 The SPD highlights that there may be other planning obligations which may be required due to site specific or local circumstances.

### Hillingdon Local Plan Accessible Hillingdon SPD (September 2017)

- 5.59 Accessible Hillingdon SPD focusses on the finer details of development proposals for it to be accessible and inclusive to all. This includes, but not limited to the standards and requirements set for blue badge and brown badge parking spaces, entrance doors, lobbies, reception areas, lifts, toilets and changing facilities and more.
- 5.60 The key is that residential development proposals comply with the following:
- *90% of new dwellings should meet M4(2) for an accessible and adaptable home as set out in Approved Document M to the Building Regulations (AD M); and*
  - *10% of new homes should meet the requirements of an M4(3) wheelchair adaptable or accessible dwelling as prescribed in AD M*
- 5.61 The SPD also highlights that major applications should include an Access Statement (part of Design & Access Statement), which outlines how the scheme has been designed to deliver an inclusive environment for all.

## 6 PLANNING ASSESSMENT

- 6.1 This section provides an assessment of the proposals against the relevant planning policies of the development plan and other material considerations.

### Principle of Development

- 6.2 The application site is located within Yiewsley town centre, a preferred location for retail and other main town centre uses and new residential development. The site is highly accessible including by modes of public transport and comprises a brownfield land. The proposals make effective and efficient use of available land and comprise sustainable development in general accordance with the thrust of planning policy set out within the development plan and the NPPF.
- 6.3 The principle of a mixed-use retail and residential development on the site has previously been established by the original (ref: 2370/APP/2018/2793) and amended (ref: 2370/APP/2019/2880) schemes of redevelopment for the site.
- 6.4 Although these permissions have since lapsed, consistent with previous decision making, the Council's planning officers have since confirmed their continued in-principle support at pre-application stage in respect of the latest proposals to redevelop the site. The proposals maintain a mix of residential and retail uses appropriate to the town centre location of the site.
- 6.5 Notwithstanding there have been some changes to the development plan since the original scheme of redevelopment was granted consent in August 2019, including the introduction of a new London Plan (2021) and the adoption of the Hillingdon Local Plan Part 2 (2020), the fundamental aims and objectives of the plans relating to mixed use town centre developments (such as this) remain the same, namely they continue; to direct retail uses to town centre locations to support their vitality and viability; to support an increase in the resident population of town centres; and, promote growth.
- 6.6 London Plan Policy GG1 recognises the crucial role town centres have in the social, civic, cultural and economic lives of Londoners. The application proposals will directly support the vitality and viability of Yiewsley town centre through the provision of a replacement modern supermarket and new apartments.
- 6.7 Consistent with London Plan policy GG2 the application proposals will maximise the benefits of this brownfield site in terms of the potential to intensify and deliver new homes in an area which is well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 6.8 Similarly, the proposals are consistent with London Plan policy SD6 which supports the vitality and viability of London's varied town centres by seeking to identify locations suitable for mixed-use or housing-led intensification to optimise residential growth potential. Consistently, policy H1 seeks to optimise the potential for housing delivery on suitable brownfield sites such as this and policy E9 confirms that "*Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable.*" The application proposals maintain a ground floor retail use (replacement supermarket) of the site and in accordance with other policy objective, seek to maximise the potential of the site in terms of making a contribution towards local housing requirements.
- 6.9 Furthermore, policy SD7 states that when considering development proposals, boroughs should take a town centres first-approach. The policy supports higher density mixed use developments within town centres on sites such as this. Boroughs are encouraged to identify sites suitable for higher density mixed-use residential intensification, capitalising on the availability of services within walking and cycling distance and current and future public transport provision including. The proposed residential apartments will help meet the strategic requirement for new homes within the Borough (Local Plan policy H1). The Council's officers have readily acknowledged the suitability of the site to contribute towards housing delivery both as part of their past decision making and their in-principal pre-application assessment of the current application proposals.
- 6.10 Furthermore, the proposals support policy E5 of the Hillingdon Local Plan in terms of providing improvements to town centres. This will be achieved through modern replacement retail floorspace and residential apartments. The future residential population of the scheme will directly support local shops and services benefiting the overall vitality and viability Yiewsley town centre. Furthermore, the proposed retail floorspace remains consistent with the scale and function of the town centre as

required by policy DMTC1. The proposals are also consistent with policy DMTC2 by maintaining a retail (Class E(a)) use at ground floor with an active frontage to the High Street.

- 6.11 Local Plan Part 1 policy E5, consistent with national planning policy (NPPF) adopts a sequential approach for the location of new retail and other main town centre uses. Town centre sites such as the application site are the preferred location for new retail uses.
- 6.12 The pre-application advice received confirms that the *"The re-provision of retail at the site is fully supported but the size of the retail unit should be no less than that which was previously approved under the passed consent. The retail unit was an anchor store for the town centre and a reduction in the size of the store was previously agreed but no further reduction in floor area will be supported in order to ensure the site remains suited to an anchor retailer."* The advice highlights the importance of the site in terms of its continued use retail purposes and its contribution to the vitality and viability of the town centre.
- 6.13 The latest proposals for the site maintain a quality replacement supermarket to serve the local community. Morrison's remain committed to a new store on the application site. The design of the supermarket reflects Morrison's latest requirements for this location against the prevailing retail climate.
- 6.14 The previously consented scheme for the application site comprised a store of 1,064sqm (NIA) sales area. The current proposals provide for a replacement supermarket comprising 1,109.5sqm (NIA) sales area. Consequently, the latest proposals represent an increase in the net sales of 45.5sqm.
- 6.15 The suitability of the proposed supermarket should of course not simply be judged by reference to size (quantitative considerations). The new store will deliver a number of qualitative improvements. Indeed, advances for example, in just in time deliveries enable modern supermarkets to manage their stock more efficiently, which frees up space for the provision of in store customer services and facilities. The store will provide a quality anchor supermarket. Customers will experience a high quality retail environment that is welcoming, well stocked and competitive.
- 6.16 In summary, the proposed development complies with national, regional and local plan policies which direct retail uses to accessible town centre locations and encourage such provision as part of schemes for residential led mixed use development which directly support the vitality and viability of town centres. The proposals will increase the supply (type and number) of new homes within the Borough consistent with strategic policy objectives. The principle of residential led mixed use development (including a replacement quality modern supermarket) is acceptable in policy terms and has previously been supported by the Council. Furthermore, the council's pre-application advice relating to the current proposals confirms their continued support for the scheme in principle. on the application site is acceptable and .

### Economic Benefits

- 6.17 The London Plan policy GG5 (growing a good economy), outlines within part C that those involved in planning and development must *"plan for sufficient employment and industrial space in the right locations to support economic development and regeneration."*
- 6.18 The London Plan policy SD1 (opportunity areas) highlights at part B(2) that planning decisions should *"support development which creates employment opportunities...for Londoners."* As highlighted within section 5 of this report, the site is located within the Heathrow Opportunity Area which has the capacity to deliver 11,000 indicative new jobs.
- 6.19 Local Plan policy E3 (strategy for Heathrow Opportunity area) outlines that Council's plans to prepare a Local Development Document (LDD) for the Heathrow Opportunity Area. The policy refers to the future growth and ambitions of key sub-areas; it outlines that *"Yiewsley & West Drayton is a suitable location for mixed-use development..."*
- 6.20 Job generation and local economic growth forms one of the key benefits (in addition to new homes) of the proposed redevelopment. Retention of local expenditure on convenience and comparison goods through the provision of a high quality modern replacement anchor supermarket. This will have direct benefits for other business in the town centre and will stimulate local consumer choice and competitive food pricing. The store will also promote more sustainable patterns of shopping for local people, reducing the need to travel for convenience goods. In these terms the proposals will help promote the vitality and viability of the town centre as a whole. The future residential population

of the scheme will mean increased local expenditure some of which will be retained and spent in local shops and businesses.

- 6.21 The proposed development will bring forward a wide range of economic benefits to the local area including approximately 80-85 colleagues employed in the foodstore, thus contributing to the objective of generating a range of new jobs within the Heathrow Opportunity Area. The scheme will also generate local business rates.
- 6.22 There will also be a range of jobs created during the construction phase which will provide temporary support for the local economy.
- 6.23 In summary the economic benefits of the scheme are consistent with chapter 6 of the NPPF which support economic growth; policies GG5 and SD1 of the London Plan and policy E3 of the Local Plan.

### Affordable Housing

- 6.24 London Plan policy GG4 requires developments to support a strategic target of providing 50% of all new housing as affordable as well as requiring developments to create mixed and inclusive communities by providing good quality homes of high design standards and provide for identified needs.
- 6.25 Similarly policy H4 in referencing the strategic target requires all major developments to provide affordable housing through consideration of a 'threshold approach'.
- 6.26 London Plan Policy H5 sets the 'threshold' at 35%, meaning that proposals which meet or exceed the threshold, are consistent with the relevant tenure split (specified by policy H6), meet other relevant policy requirements and obligations and seek to maximise the level of affordable housing provision in accordance with the strategic target can follow a 'Fast Track Route'.
- 6.27 Fast tracked applications do not need to be supported by a viability assessment at application stage, whereas applications which do not meet the requirement need to follow a Viability Tested Route.
- 6.28 The Viability Tested Route requires detailed supporting viability evidence to be submitted as part of the application to be considered against the Mayor's Affordable Housing and Viability SPG. If permitted, such proposals will be subject to ongoing viability reviews, the mechanism for which will be secured via obligations set out within a legal agreement.
- 6.29 Where affordable housing is proposed, London Plan policy H6 requires the following tenure split to be applied:
  - *a minimum of 30% low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;*
  - *a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership; and*
  - *the remaining 40% to be determined by the borough as low cost rented homes or intermediate products based on identified need.*
- 6.30 In relation to the Hillingdon Local Plan Part 1, policy H2 states that "*the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.*"
- 6.31 Furthermore, Local Plan Part 2 policy DMH7 states that in line with national policy:
  - *developments with a capacity to provide 10 or more units will be required to maximise the delivery of on-site affordable housing;*
  - *subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split 70% Social/Affordable Rent and 30% Intermediate as set out in Policy H2: Affordable Housing of the Local Plan Part 1.*

- 6.32 Policy DMH7 states that proposals which do not provide sufficient affordable housing will be resisted albeit within the context of the viability tested route prescribed by London Plan. In exceptional circumstances, where on-site provision of affordable housing cannot be delivered (for example, where site and other constraints persist), a financial contribution may be appropriate.
- 6.33 The application proposals do not include the provision of any affordable housing. Accordingly the 'fast track' route is not available and instead the proposals need to satisfy the viability test prescribed by the London Plan.
- 6.34 The application is supported by a Financial Viability Assessment prepared in accordance with the requirements and guidance set out within the London Plan and accompanying SPG.
- 6.35 The residual land value of the proposed development has been derived through a detailed assessment of revenues and costs. This has then been compared against the Benchmark Land Value of the existing site, against which it is considered whether the site can viably provide the proposed accommodation. The assessment considers whether the proposed scheme generates a surplus or a deficit against the assumed benchmark land value.
- 6.36 Furthermore, analysis relating to sensitivity testing of construction costs and residential sales growth indicates that the provision of an element of affordable housing would remain unviable either private values increase by circa 10% and build costs reduce by 5% or build costs reduce by 10% and private values increase by 5%.
- 6.37 Similarly, the Assessment considers the scenario relating to an increase the number of family sized apartments. The provision of a greater number of family apartments would result in a fewer overall number of apartments, at a lower £/sqft gross development value and a slower sales rate but with similar build costs to the proposed scheme would mean the viability of this option is poorer than the application scheme.
- 6.38 The Assessment demonstrates that the proposed scheme has a deficit of some £7.36m and therefore cannot support any contribution (either as on-site provision or an off-site financial contribution) towards affordable housing. Furthermore, the inclusion of a greater number of family sized apartments has been tested but would result in a greater deficit.
- 6.39 The viability assessment has been conducted in accordance with the policy requirements and guidance set out within the London Plan and the Hillingdon Local Plan and supplementary guidance. Although the scheme is unable to support any affordable housing provision, the scheme includes a mix of apartments including those suitable for families. Accordingly the proposals comply with the policies which seek to maximise the provision of affordable housing where this is financially viable.

### Residential Mix, Standards and Amenity

- 6.40 The development plan together with national planning policy includes a range of policies relating to residential mix, standards and amenity requirements.
- 6.41 Consistent with national Housing Technical Standards, London Plan policy D6 states that housing developments should provide adequately designed rooms with functional layouts without differentiating between tenures. Specific internal space standards are set out in Table 3.1 of the London Plan.
- 6.42 In addition, the London Plan includes a requirement for private outdoor residential.
- 6.43 The London Plan policy D7 requires residential developments to ensure that:
- *at least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and*
  - *all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'*
- 6.44 The London Plan policy H10 requires schemes to provide a range of different unit sizes, having regard to local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types and tenures.
- 6.45 The Local Plan Part 2 policy DMH2 states that "*The Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.*"

## PLANNING STATEMENT

---

- 6.46 The Local Plan Part 2 policy DMHB16 states that *"All housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should:*
- meet or exceed the most up to date internal space standards, as set out in Table 5.1; and*
  - in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users."*
- 6.47 The Local Plan Part 2 policy DMHB17 requires all residential developments to take account of the Residential Density Matrix. Developments will be expected to meet the habitable rooms standards. The Residential Density Matrix "other town centres", in this case the site, with a PTAL of 2-3 should provide 200 - 510 hr/ha and 80 - 170 u/ha (where hr = habitable rooms and u = units).
- 6.48 The Local Plan Part 2 policy DMHB18 concerns private amenity space and states:
- "A) All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3.*
- B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres."*
- 6.49 The Local Plan Part 2 policy DMHB19 states that *"New major residential developments which result in an occupancy of ten or more children will be required to provide children and young people's play facilities on-site. Where a satisfactory level of provision for children and young people's play facilities cannot be achieved onsite, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area."*
- 6.50 The Local Plan Part 2 policy DMCI5 states the following:
- "A) For all major development proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds.*
- B) In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision"*

### Assessment

- 6.51 The proposed development will provide a mix of 1, 2 and 3 bed apartments. Table 5 below provides a summary of the dwelling mix.

**Table 3: Unit Mix Summary**

Size	Number of Apartments	Percentage (by apartment)	Habitable Rooms (% of Total HaR)
1 bed	74	47	148 (35%)
2 bed	66	42	198 (47%)
3 bed	18	11	72 (17%)

- 6.52 The proposal will provide a varied mix of apartment sizes with 11% of unit or 17% by habitable rooms of the apartments being family sized homes. It is considered that the proposal provides a suitable mix of apartments considering site constraints, in accordance with the London Plan policy H10 and the Local Plan policy DMH2, which require a mix of apartments to be provided.
- 6.53 A total of 15no. apartments (9.5%) will be wheelchair accessible, compliant with part M4(3) of the Building Regulations, whereas all remaining apartments will be compliant with M4(2) of the Building Regulations. This is broadly in accordance with London Plan Policy D7 and Local Plan policy DMHB16.

## PLANNING STATEMENT

---

- 6.54 All proposed apartments will be in accordance with the Nationally Described Space Standards and in accordance with London Plan policy D6 and Local Plan policy DMHB16.
- 6.55 London Plan policy D6 requires a minimum of 5 sqm of private outdoor space to be provided for 1-2 person dwellings, with an extra 1 sqm for each additional occupant, and a minimum depth and width of 1.5m. The requirement set by Local Plan policy DMHB18 significantly exceeds London Plan policy D6.
- 6.56 Given location the site within the town centre and the objective to maximise residential development, the private amenity space standards set within the Local Plan are not achievable. Nevertheless, all the apartments have private amenity space in the form of balconies and the future residents will be able to benefit from the communal podium, which will be accessible to all. In addition, the application site benefits from its adjacency to the Grand Union Canal
- 6.57 The GLA Play space calculator shows that the proposed site will require 294.4sqm of child play space. Policy DMCI5 requires 10sqm of play space to be provided for each child. The proposed development will provide 208sqm of children play space, which falls short of the required amount. The play space will all be located within the central podium on the first floor level. Whilst the proposal does not meet the required play space area, it does result in an increase of 44.7sqm of useable play area compared to the previously consented scheme (163.3sqm). Furthermore, the application site is proximate to existing areas of child play space provision within the wider local area including that situated at the Yiewsley Recreation Ground.
- 6.58 In summary the proposed residential accommodation meets the required standards in terms of the size, quality and adaptation of accommodation. In terms of private amenity space and child space, while the scheme falls short of local requirements there is opportunity, if necessary, to provide support to improvements to existing areas of public open space including child play space.

### Design / Townscape

- 6.59 London Plan policy D3 requires that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. Paragraph B of the policy notes that higher density developments should generally be promoted in locations, such as the application site, that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 6.60 London Plan policy D4 states that Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the requirements.
- 6.61 Local Plan policy BE1 requires development proposals to have regard to the existing built environment and ensure that the proposed development enhances the local distinctiveness of the area.
- 6.62 Policy DMHB11 requires developments to be designed to the highest standards and, incorporate principles of good design including harmonising with the local context by taking into account the surrounding scale of development, height, mass and bulk of adjacent structures; building plot sizes and widths; building lines, rooflines and more.
- 6.63 The application proposals have been designed to address the viability concerns regarding the implementation of the previously consented scheme of redevelopment for the site. The Applicant has also explored opportunities to improve the design and layout of the previous scheme. The current proposals incorporate a number of design changes that are considered to further enhance the scheme including its relationship and setting within the surrounding area. Importantly, the proposals will continue to deliver a modern and high quality replacement supermarket which reflects the locality and prevailing national retail trends.
- 6.64 In summary the key design changes comprise:
- Addition of one storey to facilitate an increased number of residential apartments including those suitable for families ;
  - Minor changes to the internal layout;

## PLANNING STATEMENT

---

- The design includes two interconnected blocks with a central podium to providing a shared amenity and child play area;
- An increased separation gap between the proposed development and neighbouring properties;
- Separation of the access for service vehicles from customers and residents;
- Provision of a covered service yard for the supermarket

- 6.65 The proposed development broadly inherits the same visual characteristics as the previously consented scheme, the notable difference being the provision of the two blocks proposed as opposed to one, with a central podium connecting the two blocks and an increase in height due to an additional storey. The materials have been carefully selected to enhance the High Street and in context of the new residential development nearby, which includes but not limited to the Art Wood Apartments, Drayton Wharf and Horton Wharf. Further details of the design development can be found within the Design & Access Statement.
- 6.66 The proposed design breaks down the massing due to the inclusion of a central podium and the top floor being set back, the effect of which is positive in terms of the visual and other impacts on the street scene, local character and amenity of adjacent occupiers.
- 6.67 A Landscape and Visual Impact Assessment has been submitted in support of this application which shows the scale / massing of the proposed development from different vantage points and includes an outline of the height of the previously consented scheme to show a comparison of the approved height and the proposed height.
- 6.68 In terms of appearance, the Morrison's store is at the heart of the development. The store makes a positive contribution in terms of providing an active street frontage, it will be fully glazed to increase interactions between passers-by along the High Street.
- 6.69 The proposed building as a whole is contemporary, through the use of a mix of materials and arrangement, creating a bold and visually dynamic façade, whilst remaining sympathetic to the High Street. The proposed development will make use of buff shaded bricks to form the buildings strong presence within the street scene with dark grey cladding panels to create contrast. Above the ground level, the proposed building will include an irregular window rhythm but with regular inset balconies.
- 6.70 In addition, the proposed development will, like the previously consented scheme, continue to foster the provision of a connection between the site and the Grand Union Canal via a new path connecting with the canal towpath.
- 6.71 The proposals will enhance the street scene and the local area from a design and visual appearance perspective compliant with London Plan policies D3 and D10 and Local Plan policies BE1 and DMHB11.
- 6.72 The pre-application advice highlighted a potential concern relating to raising the height of the building in relation to neighbouring buildings, albeit the proposed setting back of the building to the site boundaries was welcomed.
- 6.73 A Tall Building Assessment is incorporated within the submitted Landscape Visual Impact Assessment and the Design & Access Statement.
- 6.74 Whilst the site is not located within a designated area for tall buildings, it is located within the Yiewsley Town Centre where there is support for increased density of development and a focus for regeneration.
- 6.75 London Plan policy D9 sets criteria for consideration of tall buildings, defined as not be less than 6 storeys or 18m from ground level, namely:
- a) *Visual impacts: long-range views, mid-range views and immediate views*
- 6.76 The proposed development respects the existing site and surrounding context.
- 6.77 The Design & Access Statement includes an assessment of the neighbouring area and the building heights which justifies the height / scale of the proposals. Whilst the majority of the buildings to the east, north and west of the site are 1-4+ storeys in height, the buildings to the south of the site range from 4+ to 8+ storeys. In addition, a separate section on Tall Building Assessment is included within the Design & Access Statement which assesses the scheme against the London Plan policy D9 and Local Plan Part 2 policy DMHB10. The Design & Access Statement includes visuals of the proposed

scheme from different viewpoints which illustrates that the impact the proposals respect the existing local character.

- 6.78 The accompanying Townscape and Visual Impact includes the Zone of Theoretical Visibility. The Appraisal includes immediate views (views 1 and 2) which are assessed to have a moderate beneficial visual effect. Mid-range views are views 3, 4 and 5, which are assessed to have a minor / moderate beneficial visual effect. Finally, long views are views 6, 7 and 8 which are assessed to have a minor beneficial / negligible visual effect.
- 6.79 The height of the High Street elevation (Cores A & B) previously consented scheme was 23.7m, compared to 28.3m for the latest proposals. The increase in height (+4.6) is predominately accounted for by the addition of an extra storey to assist with the delivery of apartments suitable for families. The increase in height can be largely achieved without detrimental effects in terms of the amenity of adjacent occupiers or impact upon townscape. The delivery of new homes within town centres is a key policy priority and the provision of additional family sized apartments are a clear benefit of the proposed scheme. The level of identified impact is considered to be minimal given the town centre location and trajectory of future developments within London as a whole.
- b) *tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding*
- 6.80 The height of the proposed development sits well within its context and will reinforce the emerging spatial hierarchy of the local area. The site itself is located within a legible area and hence a wayfinder would not be required.
- c) *architectural quality and materials should be of an exemplary standard*
- 6.81 The proposed architectural approach and materiality has been subject to detailed testing and achieves an exemplary design. The proposed building is modern yet sympathetic by the choice of material palette to be used. The retail element will be modern with a fully glazed with a transparent shopfront, providing a colourful and vibrant active frontage.
- 6.82 The building's elevations incorporate large, glazed openings, inset balconies and a mix of materials in a contemporary arrangement creating a bold and visually dynamic façade consistent with the previous planning permission for the redevelopment of the site.
- 6.83 The scheme uses buff shaded bricks to form the building's strong presence within the street scene. Protruding brickwork is offset with inset balconies and numerous window groups. Dark grey cladding panels create contrasting and irregular patterns throughout the outward facing façades.
- 6.84 The top floors are inset further and proposed to be of contrasting brown brick that continues vertically downward between the panels of light brickwork, reducing the building's overall impact and perceived mass. Vertical fin, metal balustrades complement the grey cladding panels and create a clean and elegant appearance.
- d) *proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings*
- 6.85 The site is not located within a conservation area and neither it is located in close proximity to a listed building. The proposed development will therefore not impact London's heritage assets and their settings.
- e) *buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it – this is not applicable to the proposed development.*
- 6.86 The site / proposed development is not located within the setting of a World Heritage Site.
- f) *buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm – this is not applicable to the proposed development.*
- 6.87 The site is not located near River Thames and neither it is affected by the Thames Policy Area.
- g) *buildings should not cause adverse reflected glare*
- 6.88 The proposed development is not one which would create glare. The materials proposed will not reflect any glare. The glazing materials proposed are those which are suitable for retail and residential purposes.

- h) buildings should be designed to minimise light pollution from internal and external lighting.*
- 6.89 The development will be designed to ensure no adverse light pollution is caused. An External Lighting Assessment has been submitted which concludes that the light spill onto adjacent areas will be minimised as a result of the proposed external lighting.
- 2a) Functional impact: the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants*
- 6.90 The proposed development has been subject to rigorous design development to ensure it meets relevant safety criteria and regulations, including fire regulations. A Fire Safety Statement has been submitted which demonstrates that adequate measures have been incorporated to ensure fire safety matters are considered at the planning stage of this scheme having as reference Approved Document B Volume 1 and Volume 2 (2019 version incorporating 2020 and 2022 amendments), and BS 9999:2017 and industry best practices.
- b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality*
- 6.91 The Proposed Development includes dedicated areas for the storage and collection of waste and refuse as indicated on the submitted drawings and detailed above within this Planning Statement and Design & Access Statement. The proposed development will be subject to a thorough management strategy to maintain its quality. In addition, a Demolition / Construction Management Plan, Delivery and Servicing Management Plan and an Operational Management Plan have been submitted to demonstrate that the proposed building will be serviced, maintained and managed in a manner to preserve its safety and quality.
- c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use*
- 6.92 The Proposed Development incorporates three residential cores to allow access to the residential flats above the ground level, whereas, the retail store will be directly accessible from basement customer car park and the High Street. All residential cores have staircases as well as lifts to ensure access for all; these have been designed in consultation with fire engineers to ensure that the entrance dimensions, lifts and staircases are fit for the proposed use.
- d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development*
- 6.93 The site is located in an area with a PTAL of 3. As the Transport Assessment confirms, the site is serviced by a number of bus routes as well as West Drayton railway station. Local Public transport has sufficient capacity to accommodate trips associated with the proposed development. The town centre location of the site means that many journeys can be undertaken by foot and cycle.
- e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area*
- 6.94 The proposed development will deliver a number of economic benefits, including temporary construction jobs and permanent retail jobs. The proposed replacement supermarket will provide an anchor store within the town centre helping to retain locally generated expenditure and thereby support the towns' vitality and viability. Expenditure derived from the future residential population of the scheme will also help support town centre shops and service uses.
- f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication*
- 6.95 The site is not located within an airport safeguarding zone and as such it will not create any impact on aviation. There should be no concerns, for example in terms of the flightpath to Heathrow airport. The proposed development will not cause any impact for navigation or telecommunications.
- 3a) Environmental impact: wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered*
- 6.96 The proposed development has been carefully tested in terms of daylight and sunlight impacts on adjacent residential buildings. In addition, a number of required environmental assessments have been undertaken to ensure that the proposed development is of the highest standard to ensure the conditions of the building are appropriate for the proposed uses.

*b) air movement affected by the building(s) should support the effective dispersion of pollutants*

6.97 The proposed development will have no effect in terms of air movement.

*c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building*

6.98 A Noise Impact Assessment has been submitted which concludes that noise from existing sources would not cause significant disturbance to proposed future residents.

*4a) Cumulative impact: the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals*

6.99 The cumulative impacts of the proposed development in context of the surrounding area has been demonstrated through the various assessments undertaken. This ranges from noise, air quality, daylight and sunlight and technical environmental documents.

*D. Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.*

6.100 The proposed development includes shared amenity space on the podium level, above the ground floor which provides views to the Grand Union Canal. This is a private space for sole use by future residents.

6.101 Having regard to the above assessment, the proposed development fully accords with London Plan Policy D9 in respect of tall buildings.

6.102 Similarly, Local Plan Part 2 policy DMHB10 requires proposals for high buildings to respond to the local character, and should meet the following criteria:

*i. be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings;*

6.103 The application site is located within Yiewsley town centre, which falls within the wider Heathrow Opportunity Area where increased scale and density of development is generally supported.

6.104 The surrounding area contains existing developments which range from 1+ to 8+ storeys in height. The design of the application scheme has full regard to both the prevailing and future local townscape of the area and in this regard is considered to be entirely appropriate.

*ii. be located in an area of high public transport accessibility and be fully accessible for all users;*

6.105 The application site has a PTAL of 3. This does not however reflect the recent significant improvements to public transport provided in the form of the Elizabeth Line which is within easy walking distance of the application site. The scale of the proposed development is entirely appropriate in terms of public transport accessibility.

*iii. be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views;*

6.106 A comprehensive Landscape and Visual Impact Appraisal has been prepared in support of the the proposals. There are no local views which will be affected as a result of the proposed development. The scheme is accessible from the High Street and St Stephen's Road.

*iv. achieve high architectural quality and include design innovation. Consideration should be given to its silhouette, so that it provides a positive contribution to the skyline, its design at street level, facing materials and finishes, lighting and night time impact;*

6.107 As per the comments provided in relation to London Plan policy D9 above, the proposed scheme is of a high architectural quality and makes a positive contribution to the local townscape.

*v. where residential uses are proposed, include high quality and useable private and communal amenity space and ensure an innovative approach to the provision of open space;*

- 6.108 The proposed development includes private amenity space in the form of balconies to all residential flats as well as shared communal area and child play space provided at the podium level.
- vi. *not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces;*
- 6.109 The proposed development does not present any adverse microclimate effects.
- vii. *be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities;*
- 6.110 The proposed development will be managed by the residential developer and Morrison's in accordance with servicing and maintenance plans and regimes. The proposals will provide a number of social and economic benefits including the provision of a range of much needed new homes, local employment opportunities and increased choice and competition in the local grocery market.
- viii. *comply with aviation and navigation requirements and not adversely impact upon telecommunication, television and radio transmission networks; and*
- 6.111 Consistent with the comments set out above against London Plan policy D9, the proposed development would not impact any aviation / navigation requirements or telecommunication transmission networks.
- ix. *demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes.*
- 6.112 The proposed development has been designed in consultation with fire consultants to meet the relevant requirements.
- 6.113 In summary, the proposed development complies with the Local Plan policy DMHB10.
- 6.114 In regard to safety and security, London Plan policy D11 requires development to "...*include measures to design out crime that....*"
- 6.115 Similarly, Local Plan policy DMHB15 requires all new development to ensure safe and attractive public and private spaces. The policy adds that developments should comprise of good design and create inclusive environments whilst improving safety and security by incorporating specific measures including providing appropriate lighting and CCTV.
- 6.116 The proposed development includes appropriate external lighting to maximise security. The External Lighting Assessment summarises the proposed external lighting scheme for car parking areas, circulation, amenity and other areas. The report concludes that the proposed provision of a lighting control system allows for flexibility to suit the different day / night operational and illuminance requirements. It is therefore considered that the proposed development incorporates an appropriate and balanced level of external lighting to provide security in deter crime in accordance with the London Plan policy D11 and Local Plan policy DMHB15. Furthermore, the location of entrance doors to the various residential cores, cycle and car parking areas have been carefully designed to ensure the safety and security of future residents and visitors.
- 6.117 In summary, the proposal is of a high-quality design that will optimise the development of the site, maximising the provision of a replacement retail store and residential apartments, whilst respecting local townscape and character, and safeguarding the amenity of neighbours and future residents of the scheme.

## Landscaping

- 6.118 Arboricultural Report confirms that the proposed development requires the removal of 7no. trees which are all either of Category C (6no.) or Category U (1no.). Category C trees are those of low-quality, whereas Category U trees are those of poor quality.
- 6.119 Due to the low and poor ecological values of the trees proposed for removal, the loss will not have a significant impact on the visual character and biodiversity of the local area.
- 6.120 The proposed development will provide 33no. new trees comprising of 10no. standard trees and 23no. smaller trees. This will provide a net gain of 26no. trees and the range and quality will more than offset the loss of the existing trees due to the development. Accordingly, the proposals are

compliant with London Plan policy G7, and Local Plan policies, DMHB11, DMHB14 and DMEI7, which seek to protect existing trees and where possible seeks new tree planting to protect and enhance biodiversity.

The proposed development will provide new landscaping to the site boundary, surface level car parking areas and the central podium area.

- 6.121 Full details of the proposed soft landscaping works are outlined within the accompanying Design & Access Statement and Landscape Arrangement drawings. The proposed development will make use of a mix of shrub planting, ornamental hedgerow and new trees.
- 6.122 The proposed development incorporates and maximises soft landscaping proposal as appropriate in accordance with London Plan policy G7 and D8 and Local Plan policy DMBH12.
- 6.123 The scheme has been assessed in terms of the Urban Greening Factor (UGF), a requirement of London Plan policy G5. The scoring matrix is based upon qualitative and quantitative criteria. In the absence of a locally set target, the default policy requirement for 'predominately' residential schemes is to achieve a target score of 0.4. For 'predominately' commercial schemes the target is 0.3.
- 6.124 The proposed scheme has been assessed as having a UGF score of 0.26. While this is below the target, the score for the proposed scheme represents a considerable improvement of the 'greening' of the site compared to the current position.
- 6.125 Constraints imposed by the central town centre location of the site including the requirement to maintain an active frontage to the High Street, scheme viability and the mixed use nature of the proposals (which include a significant basement customer car park, HGV service yard, associated access road which are all necessary to support the proposed replacement supermarket and in turn support the health of the town centre), mean that opportunities for the 'greening' of the site have been fully explored and maximised.
- 6.126 The proposed scheme has been amended to maximise the retention of existing trees on the site which is beneficial in terms of visual appearance and greening of the site and biodiversity. Furthermore, the proposals include the provision of off site benefits in terms of improved connections with the canal.
- 6.127 On balance, the overall quantum and quality of the proposed landscape scheme provides a significant improvement upon the current position. Importantly the scheme will be beneficial to the future residents from an amenity perspective, support biodiversity and enhance the visual appearance of the scheme in its townscape setting.

### Heritage

- 6.128 The London Plan policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.129 Local Plan Part 1 policy HE1 states that the Council will conserve and enhance Hillingdon's distinct and varied environment, including its settings and the wider historic landscape, which includes designated heritage assets and archaeologically significant areas.
- 6.130 Local Plan Part 2 policy DMHB1 states that the Council will expect development proposals to avoid the harm to the historic environment.
- 6.131 The Local Plan Part 2 policy DMHB3 states that in relation to locally listed buildings, *"the Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building. Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building."*
- 6.132 Local Plan Part 2 policy DMHB7 states that the Council *"will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds."*

- 6.133 The Site is not located within a Conservation Area and there are no listed building within the immediate neighbouring area. The closest listed building is the Grade II listed De Burgh Arms Public House (list entry number: 1080122), which is situated approximately 175m south of the site, and dates originally from the 16th century. The Railway Arms Public House (list entry number: 1358411) is also Grade II listed and is located approximately 230m south of the site.
- 6.134 In addition, there are a number of locally listed buildings on the High Street, including the Former Town Hall and the Church of St Matthews.
- 6.135 The proposed development 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.
- 6.136 The proposed development would not impact the setting of any listed (including locally listed) buildings. The setting of listed buildings is therefore preserved, in accordance with London Plan policy HC1 and Local Plan policies HE1, DMHB1 and DMHB3.
- 6.137 The previously consented scheme of development for the site was originally accompanied by an Archaeological Desk Based Assessment (July 2018) prepared by CgMs. This Assessment has been resubmitted to support of the current proposals. There have been no changes that require an updated Assessment to be prepared. The Assessment established that there are no designated archaeological assets within the site or within a 500m search area. The site is located within a wider Archaeological Priority Zone. The Assessment identifies a low-negligible potential for the site to contain archaeological remains for all periods of no more than local to regional significance
- 6.138 Subsequently, a Written Scheme of Investigation (Stage 1, dated December 2020) was approved on 4<sup>th</sup> March 2021 and an Archaeological Evaluation approved on 9<sup>th</sup> May 2022 in relation to the discharge of condition 20 (permission ref. 2370/APP/2022/878 and 2370/APP/2021/65). These reports have been resubmitted to support the current proposals. Their findings remain valid and are transferable to the consideration of the current proposals and the reports demonstrate the compliance of the scheme with policies relating to archaeology.

### Transport

- 6.139 In accordance with policy requirements, the application proposals are supported by a detailed Transport Assessment, Travel Plan and a Delivery & Servicing Plan prepared by Redwood Partnership.
- 6.140 The Transport Assessment confirms the key transport related components of the proposed development comprise:
- 64no space underground Morrison's car park, including 6no blue-badge spaces, 2no parent and toddler spaces and a proportion of electric vehicle charging spaces;
  - 22no space surface level residential car park including 4no blue-badge spaces and a proportion of electric vehicle charging spaces;
  - 2no on-site surface level car-club spaces nearest to the site entrance available to both residents and the general public;
  - 176no residential cycle parking spaces with space to expand up to 214no cycle parking spaces should more cycle parking demand be identified in the Travel Plan;
  - 32no Morrison's cycle parking spaces for customers and staff (colleagues);
  - Closure of 2no existing site accesses off St Stephen's Road, replaced with 2no. relocated site accesses for residential and Morrison's car parking and separately for a new Morrison's service yard;
  - Footway widening and street lighting enhancements on St Stephen's Road;
  - Footway widening on High Street;
  - Contribution to the Canal & River Trust for providing a future pedestrian and cycle ramped access to the Grand Union Canal from St Stephen's Road.

## PLANNING STATEMENT

---

- 6.141 The site location is well within the 400-metre recommended walk distance from bus stops. Most bus services are high frequency and operate throughout the day from approximately 03:40 hrs to 00:40 hrs with bus service 222 providing a 24-hour service. The frequency and timing of bus services provide a good and realistic opportunity for residents, colleagues and customers to consider bus travel. The site location is easily accessible to local bus services.
- 6.142 The maximum bus passenger trip generation from the development is estimated as 22no persons departing the site with 4no arrivals in the AM peak hour and 13no arriving at the site with 2no departures in the PM peak hour. Local bus service capacity is considered more than sufficient to cater for the increased bus travel demand from the proposals.
- 6.143 West Drayton station is located 250 metres (4-minutes) walk distance from the site boundary; well within the preferred maximum walking distance. With regular, comprehensive and now improved services, the station provides an attractive travel choice for staff working at the supermarket, customers and residents accessing all the proposed uses on the site. The site location is easily accessible to local rail services.
- 6.144 The proposals generate new rail trips equating to 17no departures and 2no arrivals in the AM peak hour and 9no arrivals and 1no departure in the PM peak hour. This quantum of new peak hour trips can readily be absorbed by rail services at West Drayton station and the new Crossrail upgrade. Local rail service capacity is considered more than sufficient to cater for the increased rail travel demand from the proposals.
- 6.145 The proposed Morrison's car park will provide 64no customer car parking spaces, a parking provision of one space per 27sqm gross floorspace, approximately midway between the range suggested by the Council's 2020 car parking standards. The proposed Morrison's parking provision is unchanged from the previously consented scheme of development and is compliant with the Council's 2020 car parking standards.
- 6.146 The previously consented scheme proposed a car-lite level of residential car parking with a parking ratio of 0.16 parking spaces per residential unit (23/144). The Inspector, on appeal accepted the reduced residential parking provision for the previously consented scheme which remains unchanged at 23no spaces for this application. There has been no change to policy that indicates an increased level of parking provision is required in this location.
- 6.147 The proposals for residential cycle parking include double-deck cycle-racking, initially providing cycle parking infrastructure for 176no cycles in accordance with the Council's cycle parking standards. The internal cycle storage rooms have a total maximum capacity for 214no cycles in accordance with London Plan cycle parking standards. The proposals therefore allow for future expansion of cycle rack storage from an initial 176no spaces with capacity to provide up to a maximum of 214no spaces, if future demand for additional cycle storage is required by subsequent Residential Travel Plan surveys.
- 6.148 Morrison's have advised that the quantum of service vehicle deliveries to the new Morrison's foodstore will be no greater than the previous level of servicing and may potentially be lower. All turning, manoeuvring and loading/unloading will be undertaken within the new service yard which has sufficient size to allow a 16.5m articulated lorry and 12m rigid lorry to enter, turn and reverse to the loading/unloading dock. All deliveries will enter the service yard direct from St Stephen's Road in forward gear, turning right into the service yard, then clockwise within the service yard area, before reversing into the loading bay. The track swept paths show that the service vehicle manoeuvres can be undertaken safely within the service yard.
- 6.149 Morrison's refuse collection will use private vehicles no larger than a 12m rigid lorry. All Morrison's refuse manoeuvring occurs within the service yard with vehicles leaving in forward gear. Vehicle turning requirements for emergency fire tenders and ambulances are smaller than for a refuse vehicle and will therefore require less area to turn on site if required. Refuse collection and servicing for the residential development will take place from the street frontages, serving nearby businesses and properties as it occurs for these neighbours at the present time.
- 6.150 Total traffic flows include base network traffic flows growth to Opening Year 2025 and Horizon Year 2027 together with net development traffic and 5no committed development sites. These total traffic flows are used to test the effect of the proposals on the capacity of the High Street/St Stephen's Road junction. The assessment shows that the High Street/St Stephen's Road junction will operate within capacity at both Opening Year 2025 and Horizon Year 2027 with a maximum RFC of 0.38 and a queue of 1 vehicle on St Stephen's Road in 2027. The proposals will have a beneficial effect

on High Street/St Stephen's Road junction as the reduction in Morrison's parking provision will reduce traffic and encourage alternative modes of transport other than the private car.

- 6.151 The Transport Assessment shows that the proposals demonstrate they deliver improvements that support Transport for London's Vision Zero and the Healthy Streets approach by reason of its town centre location; reduced traffic generation compared to its former operation; much reduced car parking provision promoting walking, cycling, bus and rail travel; significant cycle parking provision and funding of 2no car club spaces and off-site pedestrian/cycle improvements which will provide easy pedestrian and cycle access direct to the adjacent Grand Union Canal.
- 6.152 Residual cumulative impact in transport terms is shown to be beneficial and not 'severe'. The proposals accord with the relevant transport policies at national, regional and local level consistent with decision making in relation to the previously consented scheme. The proposals have been fully assessed in the light of current local and national transport policy and are shown to be compliant with transport policy objectives.

### Drainage / Flood Risk

- 6.153 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.
- 6.154 A Flood Risk Assessment and Drainage Statement (prepared by Ward Core Consulting Engineers; ref. 10/4897 rev. A) is submitted to support the application along with a Drainage Strategy Plan (ref. SK500).
- 6.155 The FRA and Drainage Statement highlights that the ground floor levels will be set at least 150mm above adjacent finished site levels. As the site is located within Flood Zone 1, specific flood mitigation measures for the development are not required.
- 6.156 In terms of foul drainage, the existing site is served by a 300mm diameter of public foul sewer along St Stephen's Road. Thames Water has indicated that there is sufficient capacity in its foul sewer network to accommodate the additional flows from the proposed development. As such, the proposed foul drainage will be designed and incorporated in accordance with the current standards and existing foul connections will be used where possible.
- 6.157 The proposed site incorporates SuDS features including green roofs and geo-cellular soakaway. A fuel interceptor will be installed to remove pollutants from any surface water in the proposed service yard basement car park.
- 6.158 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 London Plan policies SI12 and SI13 and the Local Plan policies EM6 and DME10.

### Energy & Sustainability

- 6.159 This application is supported by a suite of technical reports covering different areas of sustainability and energy.

#### Apartment Heating Assessment

- 6.160 An Apartment Heating Assessment has been submitted which considers the heating options for the proposed residential dwellings with regard to the London Plan recommendation that natural gas combustion is omitted from the scheme.
- 6.161 The Assessment outlines that the heating system to the proposed dwellings can be configured in two main arrangements as follows:
- A central plant with a pipework distribution system.
  - An individual heating system to each apartment.
- 6.162 The report considers the criteria for both central and individual heating system. With further assessment, it has been recommended that the proposed scheme incorporates individual heating system which would include the use of air source heat pumps. The air source heat pump power

supply will be provided from the apartment power supply and hence a separate energy metering system to allow for energy recharge would not be required.

### Circular Economy Statement

- 6.163 London Plan Policy SI 7 concerns reducing waste and supporting the circular economy. The policy specifically requires proposals to be supported by a Circular Economy Statement. The submitted Circular Economy Statement provides a detailed overview of the various strategies and design approaches that have been considered and are to be implemented as part of the proposed scheme of redevelopment in compliance with the policy requirement.
- 6.164 The proposed scheme aims to meet the following targets:
- 95 per cent reuse/recycling/recovery of construction and demolition waste.
  - 95 per cent beneficial use of any excavation waste.
  - 65 per cent recycling of municipal waste by 2030.

- 6.165 The Circular Economy Statement will be continually developed throughout the demolition, excavation, construction and operation phases to provide greater detail and transparency to the specific measures and targeted circular economy ambitions.

### Sustainability Statement

- 6.166 This sustainability statement describes how the proposed development will provide appropriate levels of sustainability within the design and construction of the development. This covers the key themes of Energy, Transport, Sustainable Urban Drainage (SuDs), Water, Waste, Air Quality, Ecology and Noise.
- 6.167 The report demonstrates the compliance of the scheme via a sustainability matrix against relevant policies of the Hillingdon Local Plan and London Plan.

### Overheating Analysis

- 6.168 An Overheating Analysis has been prepared in support of the proposed scheme of development.
- 6.169 The residential accommodation has been analysed for the overheating risk against the criteria for predominantly naturally ventilated homes in accordance with the requirements of CIBSE TM59 and the Building Regulations Part O requirements.
- 6.170 The thermal modelling carried out in accordance with the London Plan, CIBSE TM59 and Building Regulations Part O has not demonstrated a risk of overheating when assessed against the DSY1 weather file which is the mandatory measure of compliance.
- 6.171 However, the assessments for weather files DSY2 and DSY3 do demonstrate a slightly increased risk of hours out of the acceptable range occurring that exceed the limits set out in TM59 and Building Regulations Part O.
- 6.172 The modelled scheme incorporates the passive measures appropriate to the development to reduce the risk of overheating. The measures include multiple fully openable apertures to each habitable room, openable internal doors to allow cross ventilation and balcony shading devices. In addition to the above the thermal properties of the glazing and external fabric have been improved as far as is possible without failing the Fabric Energy Efficiency (FEE), which is a statutory Building Regulations requirement.
- 6.173 The report accounts for all relevant design features and anticipated building usage. Should the final design and/or use of the building differ from the described, or should the actual weather differ from the accredited weather files, then 'out of range' temperature may occur beyond that predicted.

### Energy Statement

- 6.174 In line with London Plan policies (policies SI 2, SI 3 and SI 4) and supporting guidance the energy strategy for the proposed development has adopted a hierarchical approach using passive and low energy design technologies to reduce baseline energy demand and CO2 emissions followed by the application of low and zero carbon technologies. The energy strategy seeks to demonstrate a minimum overall 35% reduction in on-site carbon dioxide emissions in line with the London Plan. The following passive and low energy design measures have been incorporated into the proposed development:

- High performance glazing
- Improved building fabric
- Inter-pane blinds to reduce solar gain in residential flats
- Low building air leakage rate
- Variable speed fans and pumps.
- Heat recovery ventilation
- Low energy lighting.
- Automatic lighting control with occupancy sensors (auto on, auto off).

6.175 The total cumulative savings exceed the minimum 35% on-site carbon reduction target for the residential but cannot be reached for the commercial and fully achieve the zero-carbon overall target. Therefore, a payment in lieu contribution to the Council to offset to zero carbon would need to be secured by a legal agreement.

#### **External Lighting**

6.176 An External Lighting Assessment has been submitted which summarises the external lighting scheme to be provided for the development. The assessment reaches the following conclusion:

1. The operational external lighting design criteria is met in each separate functional area of the site.
2. The proposed luminaires have no upward light output.
3. The light spill onto adjacent areas is minimised.
4. The provision of a lighting control system allows for flexibility to suit the different day/night operational and illuminance requirements.

#### **Plant / Ventilation**

6.177 The Ventilation and Extraction Statement summarises the mechanical ventilation and extraction philosophy to be provided within the proposed development.

#### **Utilities Statement**

6.178 A Utilities Statement has been prepared which provides details of any existing utility constraints identified on and around the proposed development site together with the implications associated with the new utilities required for the development.

6.179 The existing utilities to the development will be disconnected and stripped out. The utility searches have indicated that there are not any utility services that cross the site to serve other properties that need to be diverted.

#### **Water Efficiency Assessment**

6.180 The submitted Water Efficiency Assessment examines the potable water efficiency measures incorporated into the proposed scheme of development. The assessment demonstrates compliance with London Plan policy SI 5 and Local Plan policy DMEI 10 namely to ensure that all new residential development does not exceed water usage of 105 litres per person per day.

#### **Air Quality**

6.181 The Air Quality Assessment provides an evaluation of the temporary effects on air quality during the construction phase and the impact on future occupants during the operational phase.

6.182 The application site is located within the Hillingdon Air Quality Management Area (AQMA) which has been designated due to elevated concentrations of nitrogen dioxide (NO<sub>2</sub>) attributable to road traffic emissions. The site is also located within a designated Air Quality Focus Area (AQFA), a pollution hotspot where there is the potential for high human exposure and where the GLA believes air quality issues are the most acute.

6.183 For the construction phase, the most important consideration is dust. Without appropriate mitigation, dust could cause temporary soiling of surfaces, particularly windows, cars and laundry. The

proposed range of mitigation measures should ensure that the risk of adverse dust effects is reduced to a minimum.

- 6.184 Detailed atmospheric dispersion modelling has been undertaken for the first year in which the development is expected to be fully operational, 2024. Pollutant concentrations are predicted to be well within the relevant health-based air quality objectives at the façades of proposed receptors. Therefore, air quality is acceptable at the development site, making it suitable for its proposed uses. Using the criteria adopted for this assessment together with professional judgement, the operational air quality effects are considered to be 'not significant' overall.
- 6.185 The proposed development does not, in air quality terms, conflict with national or local policies, or with measures set out in Hillingdon's Air Quality Action Plan. There are no constraints to the development in the context of air quality.

## **Noise**

- 6.186 The Noise Assessment highlights that the changes to the proposal compared to the previously consented scheme are minimal in terms of noise impact. The assessment sought to determine a) the impact of existing noise on the proposed residential properties and b) the impact of proposed ground floor commercial use on existing and proposed residential properties.
- 6.187 The impact of road traffic noise has been assessed in accordance with BS 8233:2014 and the Professional Practice Guidance ProPG Planning and Noise for new residential developments.
- 6.188 Taking into account the good acoustic design measures the site can be developed to ensure reasonable internal and external noise levels which comply with the requirements of BS 8233:2014.
- 6.189 The assessment concludes that noise from existing sources would not cause significant disturbance to proposed future residents and is therefore in accordance with the policy aims of National Planning Policy Framework.
- 6.190 Unlike the existing arrangements the proposed store will be served by a fully enclosed delivery area which will reduce the noise impact from delivery activity on existing residential properties.
- The use of suitable planning conditions will control noise from any mechanical services and noise break-out from delivery area and shop floor and will ensure any noise from the proposed food store will not cause impact to existing and future residents in line accordance with the policy aims of the National Planning Policy Framework.

## **Fire Risk**

- 6.191 The London Plan policy D5 requires development proposals to be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Similarly, policy D12 requires development proposals to achieve the highest standards of fire safety.
- 6.192 The application proposals are supported by a Planning Gateway One Fire Statement and London Plan Fire Statement. The Statements demonstrate that adequate measures have been incorporated to ensure fire safety matters are considered at the planning stage of the scheme having as reference Approved Document B Volume 1 and Volume 2 (2019 version incorporating 2020 and 2022 amendments), and BS 9999:2017 and industry best practices. The Statements demonstrate full compliance with London Plan policies D5 and D12.

## **Daylight and Sunlight**

- 6.193 The Daylight and Sunlight Assessment considers the effect the proposed development on the amenity of the surrounding properties as well as the daylight and sunlight that will be received to the habitable rooms within the development and sunlight to the external communal amenity areas.
- 6.194 The majority of rooms in the neighbouring properties would comply with the BRE guidance. Where deviations from the default numerical guidance occur, the neighbouring properties would retain contextually appropriate levels of daylight and sunlight amenity for a town centre location.

## PLANNING STATEMENT

---

- 6.195 Owing to the low-rise nature of the existing buildings on site, the neighbouring properties currently receive unusually high levels of daylight and sunlight amenity, well in excess of what would ordinarily be expected in a town centre location. Indeed, any development that makes efficient use of the site would inevitably cause reductions in daylight and sunlight amenity to the neighbouring properties beyond the numerical guidance given in the BRE Report.
- 6.196 The vast majority of living rooms and bedrooms within the development would receive good levels of daylight amenity. Where daylight is restricted, this is predominantly to kitchen areas at the rear of the living space, which are designed to be predominantly artificially lit with the main living areas receiving most natural light.
- 6.197 The large communal external amenity area would receive high levels of sunlight amenity, as would the vast majority of rooms served by windows orientated in a southerly direction.
- 6.198 In accordance with national and local planning policy, including the London Borough of Hillingdon's Local Plan, the development would have an acceptable effect on daylight and sunlight amenity to the neighbouring properties. Adequate levels of daylight and sunlight amenity would also be received within the proposed apartments.

### Planning Balance

- 6.199 The proposals comply with many of the policy aims, objectives and requirements of the London Plan and Hillingdon Local Plan as well as the national planning policy framework.
- 6.200 The application site is a preferred location for new retail and residential development. The site is readily accessible by modes of public transport. The principle of a mixed use, residential led scheme of redevelopment of the site including a replacement supermarket continues to be supported consistent with previous decision making.
- 6.201 There will be a number of social and economic benefits arising from the proposals. The proposals will contribute to the requirement to deliver new homes within the Heathrow Opportunity Area and will directly support the vitality and viability of Yiewsley town centre through the provision of a modern high quality replacement supermarket (thereby helping to retail local expenditure) and expenditure generated by the future residential population of the scheme, some of which will be spent locally.
- 6.202 The supermarket will provide the local community with increased choice and competition in terms of grocery shopping. Furthermore, the proposals will generate a number of local employment opportunities.
- 6.203 The height and density of the proposed development is appropriate to its central location within the town centre and Opportunity Area. The supporting evidence demonstrates that the proposal will not have an adverse effect upon the amenity of adjacent occupiers and that the design including, height, bulk and mass is appropriate to the townscape setting.
- 6.204 The design follows that previously consented albeit the scheme includes a number of improvements including the provision of a covered service yard, separation of residential/customer and service vehicle access, a reduction in bulk and mass, the provision of an additional storey which has been sensitively designed to create additional family sized apartments, and the creation of high quality amenity spaces for residents to enjoy.
- 6.205 In relation to technical matters such as carbon, drainage, energy, fire compliance etc, the scheme is in general compliance with policy requirements. Where appropriate contributions may be required as part of a legal agreement to address any shortfalls, for example, to offset carbon where this cannot be achieved on site through suitable mitigation measures etc.
- 6.206 Although the scheme does not include any affordable accommodation, a range of apartments are provided including those suitable for families. The applicant anticipates the inclusion of a mechanism within a legal agreement to monitor the viability of the scheme. Even so, the sensitivity testing undertaken indicates that there would need to be a significant reduction in terms of future build costs and/or increased sales values to support affordable housing on the site. Furthermore, the provision of a greater number of larger apartments (suitable for larger families) at the expense of smaller apartments (as proposed) would further erode scheme viability.
- 6.207 These latest proposals for the site have been developed against a difficult prevailing economic backdrop, where construction costs have spiralled (raw materials and labour costs) which meant the

## PLANNING STATEMENT

---

previously consented schemes (original and amended) were not viable to implement. The Applicant including the supermarket operator (Morrison's) remain committed to the site to ensure the delivery of a beneficial scheme of development for the local community. The current proposals address viability through changes to construction method/materials and design. Even so, the scheme remains comparable to that previously consented.

- 6.208 In summary, the proposals provide a number of social, economic and environmental benefits consistent with the policies of the development plan and the NPPF. On balance it is considered the proposals should be favourably determined. The benefits of the scheme outweigh other matters, for example the lack of affordable housing and the provision of a greater number of family sized apartments, the provision of which would make the scheme unviable. Furthermore, a package of measures, consistent with previous schemes to develop the site, will be offered as part of a legal agreement. These measures are described in the next section of this Statement.

## 7 PLANNING OBLIGATIONS AND CONDITIONS

- 7.1 This section briefly examines the liability of the proposals in terms of the community infrastructure levy (CIL) and sets out the proposed heads of terms for a legal agreement.

### CIL

- 7.2 The proposed development is CIL liable as it creates new floorspace in excess of 100sqm and comprises the creation of new dwellinghouses.
- 7.3 The liability of the scheme is reduced having regard to the need to demolish existing in-use buildings situated on the site.
- 7.4 The scheme is proposed to be developed in phases, in accordance with the submitted phasing plan. As such CIL should be applied to individual phases of the proposed development.
- 7.5 The Mayor of London's CIL (MCIL2)(April 2019) sets a charge of £60 per sqm (plus indexation) in respect of the proposed development. Similarly, at a local level, Hillingdon CIL (August 2014) sets a charge of £95 per sqm for residential uses (Class C3) of £95 per sqm (plus indexation). The charge in respect of the proposed retail floorspace is zero.

### Legal Agreement

- 7.6 In order to make the proposed development acceptable in planning terms the following Heads of Terms are proposed by the Applicant to form part of a legal agreement made under Section 106 of the Planning Act.
- 7.7 The Heads of Terms summarise matters raised by other technical reports submitted in support of the proposed development and are broadly consistent with those agreed as part of the previously consent scheme of development, namely:
1. Affordable Housing (mechanism to test the ongoing viability of the scheme )
  2. Air Quality & Green Infrastructure Contribution
  3. Canal and River Trust Contribution
  4. Car Club
  5. Carbon Offset Contribution
  6. Construction Training Scheme and Contribution
  7. Council Legal Costs Relating to the S106
  8. Cycle Parking Demand Review
  9. Highway Improvement Works and Contribution
  10. Project Management and Monitoring Fee
  11. Residential Parking Permit Restrictions
  12. Residential Travel Plan
  13. Retail Travel Plan
  14. Santander Bike Scheme Contribution

### Conditions

- 7.8 Many of the conditions relating to the previously consented scheme of development are capable of being transferred to any permission granted in respect of these proposals. The conditions will ensure the scheme remains acceptable through the various phases of development from demolition and construction to occupation.

## 8 CONCLUSION

- 8.1 In summary the following conclusions can be drawn from this Statement:
- The principle of the proposed redevelopment of the site for a replacement foodstore together with residential apartments has previously been accepted by both the Council and the Mayor of London. Planning policy continues to support the principle of development and pre-application advice received from planning officers endorses the mix of uses proposed.
  - The application site is a preferred location for new retail and residential development. The proposed development directly supports the aims and ambitions of the Heathrow Opportunity Area in terms of economic growth and the delivery of new homes.
  - The proposals comprise a high quality modern replacement supermarket consistent with the support evidenced by previous permissions for the redevelopment of the site. The supermarket will re-provide an anchor store within the town centre with consequent benefits for the vitality and viability of the town centre as a whole.
  - The proposals are necessary and appropriate to address the viability concerns relating to the previous scheme of development for the site which lapsed due to escalating build costs.
  - The financial assessment demonstrates that the provision of an 'affordable' residential component is not currently viable. Similarly the provision of a greater number of larger family sized apartments would not assist the viability of the scheme and would jeopardise investment and the delivery of other benefits for the local community including the provision of a replacement supermarket.
  - The proposals seize the opportunity to maximise the redevelopment of the site for a range and mix of apartments including those suitable for families..
  - The proposed design and layout of the scheme has been enhanced, creating a more harmonious development in terms of the local townscape setting of Yiewsley town centre.
  - The site is located in sustainable location accessible by a choice of means of transport including local bus and train services including the Elizabeth Line. Consistent with the previously consented scheme, the amount of on site residential car parking is restricted.
  - The proposed supermarket will provide an enhanced customer experience through an improved store layout and customer facilities, providing local residents with increased choice and competition.
  - The range of technical reports demonstrate the compliance of the proposed scheme against national, London Plan and Hillingdon Local Plan policy requirements.
  - The proposed design, layout and use of material are of a high standard which respects the character of the local area. The separation of the residential accommodation by a large communal amenity podium improves the appearance of the scheme, the outlook and amenity of future residents and removes potential conflicts between residents/customer and service vehicles visiting the site.
- 8.2 The Applicant remains committed to the redevelopment of the application site. The proposals represent represents a significant investment in the town centre. The uses proposed mix of uses are appropriate and the principle of redevelopment is consistent with previous decision making and compliant with national and local policy objectives.
- 8.3 The various technical reports demonstrate that there are no issues or impacts arising from the proposals which give rise to any planning concerns.
- 8.4 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 other material considerations indicate otherwise. The application proposals fully accord with the statutory development plan. There are no material considerations which otherwise indicate that this application should not be determined favourably.
- 8.5 The development will give rise to significant economic, social and environmental benefits and is considered to be a sustainable form of development situated within a town centre location.