



# Planning Statement



Client Name: Linea UB7 Limited  
Site Address: Tavistock Works, Yiewsley Town  
Centre, West Drayton, UB7 7QX  
Date: March 2026



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SECTION 1

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Introduction



## 1.0 Introduction

1.1.1 This Planning Statement (“Statement”) has been prepared by CarneySweeney on behalf of Linea UB7 Limited (“the Applicant”), to support a planning application (the “Application”) for residential development at Tavistock Works, Tavistock Road, West Drayton, UB7 7QX (“the Site”). This planning application is submitted for full planning permission.

1.1.2 On 21 September 2022, planning permission for redevelopment of the Site was granted through appeal (ref. APP/R5510/W/21/3288222, planning application ref. 35810/APP/2021/1234). This appeal granted permission for the demolition of the existing building and its replacement with an up to 8-storey building comprising 32 residential units and associated car parking, landscaping and amenity space. Subsequent to this, a number of permissions were granted under Section 73 for variations to the approved scheme, resulting in, amongst other things, an increase of the number of residential units, to 38, and the height of the scheme being permitted to a consistent 8 storeys across the entire building. This permission was not implemented, and lapsed on 20 September 2025.

1.1.3 The Application for which planning permission is now sought comprises the demolition of the existing building and its replacement with a lower 6-storey building comprising 31 residential units, with associated landscaping and amenity space (“the Proposed Development”). The proposed description of development is as follows:

***“Demolition of existing building and replacement with a 6-storey building comprising residential units, landscaping and amenity space.”***

1.1.4 The Site is located within the administrative area of the London Borough of Hillingdon (“LB Hillingdon” or “the Council”), as identified in Figure 1 below.

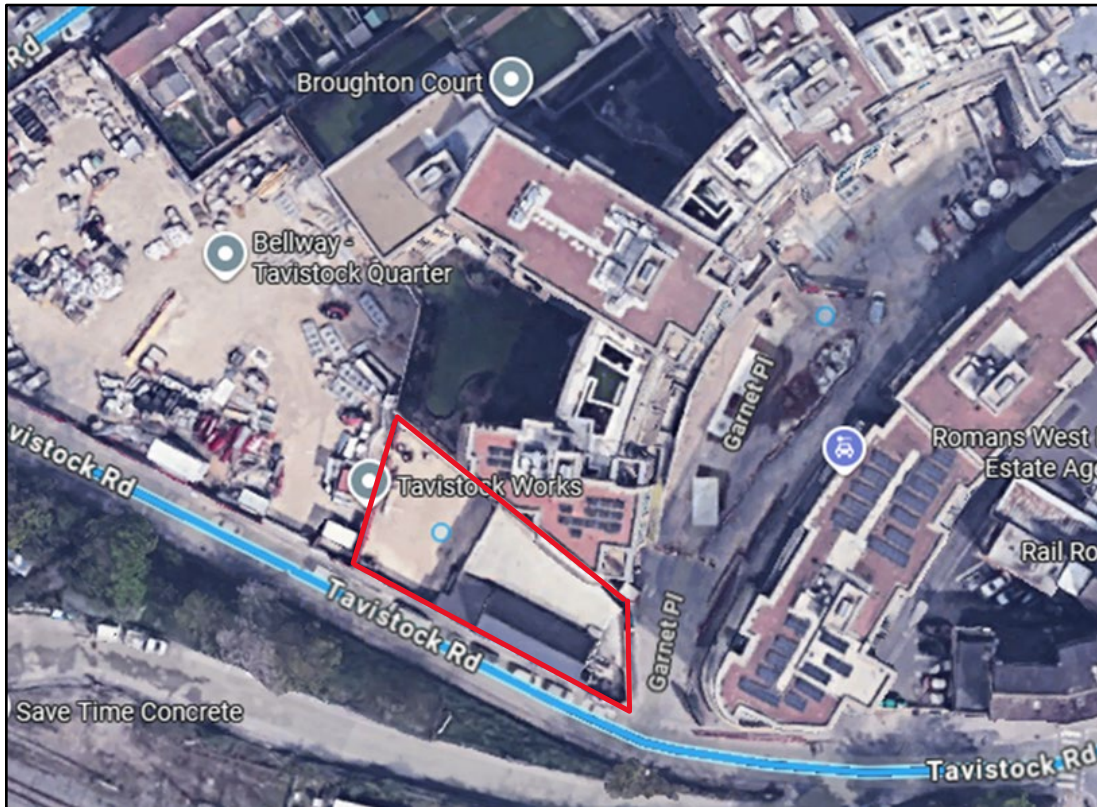


Figure 1: Aerial Site Location (approximate planning application boundary shown)

1.1.5 This Statement provides information pertaining to the Site, by means of details of the existing Site and planning history, alongside an assessment of the Proposed Development against relevant planning policies and any other material considerations, in accordance with Section 38(6) of the Planning and Compulsory Purchase Order Act 2004 (as amended).

**Structure of Planning Statement**

1.1.6 This Planning Statement is structured as follows:

- Section 1 (this section): Introduction;
- Section 2: The Site and surrounding area;
- Section 3: Planning History;
- Section 4: Proposed Development;
- Section 5: Relevant Planning Policy;
- Section 6: Planning Assessment;
- Section 7: Community Infrastructure Levy and Planning Obligations; and
- Section 8: Planning Balance and Conclusion.



## Supporting Documentation

1.1.7 This Application is supported by a number of documents, as follows:

- Planning application forms and certificates, including CIL form;
- Planning Statement which also includes reference to affordable housing and planning obligations (Section 106 Heads of Terms) (CarneySweeney);
- Design and Access Statement (including Accessibility Strategy and Accommodation Schedule) (Airc Design);
- Air Quality Assessment (Cogan Environmental Consulting);
- Low Emission Strategy (Cogan Environmental Consulting);
- Dust Management Plan (Cogan Environmental Consulting);
- Daylight and Sunlight Assessment (T16 Design);
- Flood Risk Assessment, Surface Water Management and Water Cycling Strategy Report (Flo Consult UK);
- Ground Conditions Assessment Letter (GeoCon Site Investigations Ltd.);
- Ground Investigation Report – Geotechnical Site Investigation, (GeoCon Site Investigations Ltd.);
- Geoenvironmental Site Investigation Report – Phase 1 Preliminary Risk Assessment, (GeoCon Site Investigations Ltd.);
- Ecological Appraisal (Cherryfield Ecology);
- Energy Statement (Love Design Studio);
- Overheating Assessment (Love Design Studio);
- Landscape Design Strategy (Guarda Landscape);
- Noise Impact Assessment (ACA Acoustics);
- Heritage and Townscape Visual Impact Assessment (Levrant);
- Transport Statement (i-Transport);
- Travel Plan (i-Transport);
- Refuse Management Plan (i-Transport);
- Development Viability Report (Home Consultancy Ltd.) and
- A Schedule of Drawings and all of the drawings referred to in that Schedule.



SECTION 2

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Site and Surroundings



## 2.0 Site and Surroundings

### 2.1 Site Location and Surrounding Area

2.1.1 The Site is located in Yiewsley Town Centre, West Drayton. It covers a total area of approximately 0.07ha, and is of an irregular shape located on the northern side of Tavistock Road close to the junction between Tavistock Road and West Drayton High Street.

2.1.2 West Drayton railway station is approximately 150m to the east of the Site.

2.1.3 Figure 2 below shows the Site's location in the context of the surrounding street and railway network.

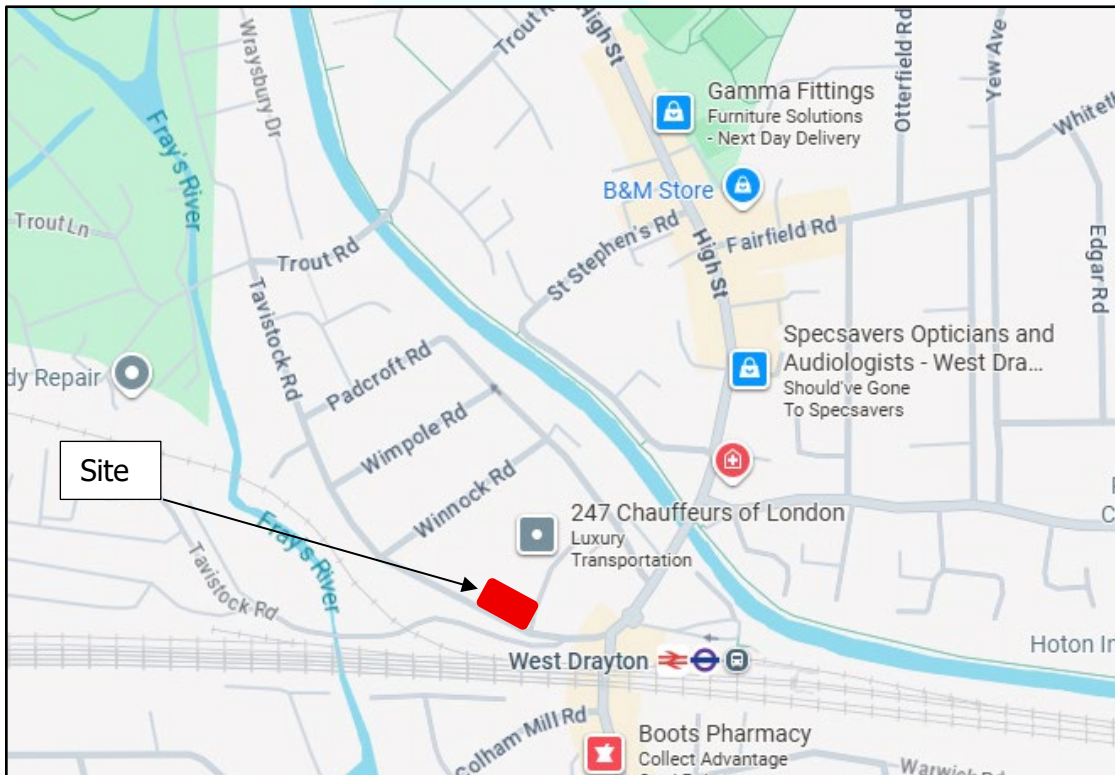


Figure 2: Site location in context (source: Google Maps)

2.1.4 The Site currently comprises a 316sqm office building (Use Class E)) with an area of hardstanding adjacent, with access taken from a vehicle crossover on Tavistock Road. No soft landscaping is present.

2.1.5 Immediately to the north and east of the Site is Padcroft Works, a completed new development comprising 315 residential units across three buildings rising from three to eight storeys, with associated landscaping and car parking.

2.1.6 To the immediate west, the site known as COMAG I was granted planning permission in June 2024 for its redevelopment to provide a building ranging from two to seven storeys, comprising 105 residential units with a community hub, associated landscaping and car parking.



- 2.1.7 Together with the Site, Padcroft Works and COMAG I create a development parcel which are collectively allocated for comprehensive redevelopment.
- 2.1.8 The Site is located within walking distance to local services and facilities, including a post office, public houses, supermarket, small retail units, restaurants and places of worship. Community facilities such as a doctor's surgery, primary school and children's nursery, are located in close proximity to the Site, and public open spaces, including Yiewsley Recreation Ground, Thorney Country Park and Stockley Country Park are easily accessible as well as the Grand Union Canal. As such, the Site is well served by local services, facilities and amenity space.
- 2.1.9 The Site is in a sustainable location, being approximately 150m from West Drayton Railway Station, with its services on TfL and Great Western Railway into London and the south east, and services on the Elizabeth Line giving direct access through central London. Bus stops serving routes 222, 350, U1, U3 and U5 to Hounslow, Hayes Town Centre and Heathrow Airport are all in close proximity. The Site is therefore afforded a PTAL rating of 3 (moderate).
- 2.1.10 Both bus stops and railway station are within approximately 2 minutes walk of the Site, and accessed along good quality, wide and well lit footways with designated pedestrian crossings, dropped kerbs and tactile paving. Designated cycleways are present for much of the route. The afforded PTAL 3 rating is therefore not considered to be truly reflective of the Site's highly accessible location, more details of which can be found in the submitted Transport Assessment.
- 2.1.11 In terms of flood risk, the Environment Agency's Flood Map for Planning shows the Site to be located entirely within Flood Risk Zone 1, at a 'low' risk of flooding from fluvial sources.
- 2.1.12 The Site is not locally or statutorily listed, nor is it located in a Conservation Area.

## 2.2 Planning Designations

### London Plan

- 2.2.1 The site lies within the Heathrow/Elizabeth Line West Opportunity Area as identified at table 2.1 and figure 2.10 of the London Plan 2021 (LP). The Opportunity Area contains the Hayes to West Drayton corridor and Yiewsley Town Centre, which has redevelopment opportunities for a range of potential uses. It sets a minimum target for the provision of 13,000 new homes at Heathrow and 3,000 new homes at Hayes.

### LB Hillingdon

- 2.2.2 The Site is shown as being within the Yiewsley Town Centre on the adopted Hillingdon Policies Map. It is outside of the primary and secondary shopping frontages.
- 2.2.3 The Local Plan Part 2 (Site Allocations and Designations), at Policy SA38 (Padcroft Works and COMAG), allocates the site for comprehensive redevelopment, with preference being stated for the three sites, A, B and C to form a comprehensive development scheme across the whole allocation area. The Site is referred to as Site C (COMAG II) in this allocation.



2.2.4 Policy SA38 states that proposals for residential development on Site C, in accordance with London Plan densities and subject to design agreement, will be supported, and that these should integrate with and complement development on the adjacent sites.

2.2.5 An extract from Policy SA38 showing the site allocation and development parcels within is shown at figure 3 below.

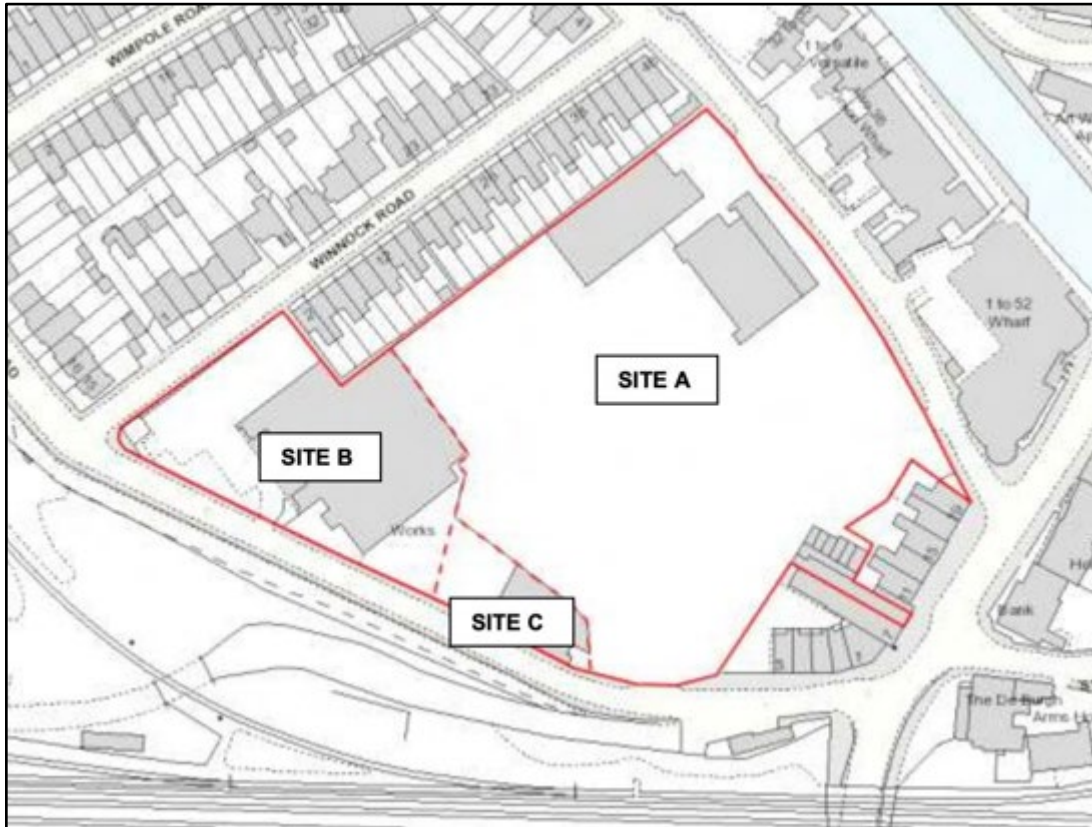


Figure 3: Site allocation Policy SA38: Padcroft Works and Comag



SECTION 3

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Planning History



## 3.0 Planning History

### 3.1 Site Planning History

3.1.1 An online planning search using LB Hillingdon's planning database has been undertaken for the Site and its immediate surroundings and is summarised below.

**Application Ref. 35810/APP/2018/4430**

3.1.2 Prior Approval for change of use of an office (Use Class B1a) to residential (Use Class C3) to create 7 flats (4 x studio and 3 x 1-bed).

3.1.3 Approved 01/03/2019.

**Application Ref. 35810/APP/2020/187**

3.1.4 Redevelopment of the site to include the demolition of the existing building (Use Class B1a) and the erection of a 8-storey building and a basement to provide residential units (Use Class C3) and associated works.

3.1.5 Refused 13/10/2020.

**Application Ref. 35810/APP/2021/1234**

3.1.6 Demolition of existing building and replacement with an up to 8-storey building comprising residential units and associated car parking, landscaping and amenity space.

3.1.7 Allowed via appeal, approved 21/09/2022 (Appeal Ref. APP/R5510/W/21/3288333).

3.1.8 This permission was varied by applications under Section 73 and Section 96a (see below). The permission was not implemented and has lapsed.

3.1.9 Within this Planning Statement, this application is referred to as "the Appeal Permission".

**Application Ref. 35810/APP/2023/219**

3.1.10 Variation (s73) to Planning Inspectorate decision letter dated 21-09-2022 for appeal reference APP/R5510/W/21/3288333 (LPA planning reference 35810/APP/2021/1234) for the Demolition of existing building and replacement with an up to 8-storey building comprising residential units, landscaping and amenity space. The application sought to amend conditions 2, 3, 5 and 17 as a result of proposing to replace approved parking spaces with two additional residential units.

3.1.11 Dismissed via appeal, refused 28/03/2024.



**Application Ref. 35810/APP/2023/444**

3.1.12 Non-Material Amendment Application submitted under Section 96A of the Town and Country Planning Act 1990 (as amended), to amend planning inspectorate decision letter dated 21-09-2022 for appeal reference APP/R5510/W/21/3288333 (LPA planning reference 35810/APP/2021/1234) so that the description of development changed from "Demolition of existing building and replacement with an up to 8-storey building comprising residential units and associated car parking, landscaping and amenity space" to "Demolition of existing building and replacement with an up to 8-storey building comprising residential units, landscaping and amenity space".

3.1.13 Approved 14/03/2023.

3.1.14 This application superseded application ref. 35810/APP/2023/219 and sought to amend the approved description of development of the Appeal Permission. 'Car parking' was removed from the description.

**Application Ref. 35810/APP/2023/2106**

3.1.15 Application pursuant to Section 73 to vary Conditions 2 (Approved Plans) and 13 (Energy) of Planning Inspectorate decision letter dated 21-09-2022 for appeal reference APP/R5510/W/21/3288333 (LPA planning reference 35810/APP/2021/1234) for the Demolition of existing building and replacement with an up to 8-storey building comprising residential units, landscaping and amenity space. The proposed amendments included the replacement of the winter gardens with balconies and the replacement of the reference to the energy statement within Condition 13 to reflect an updated energy statement.

3.1.16 Approved 24/01/2024.

**Application Ref. 35810/APP/2024/243**

3.1.17 Variation of Conditions 2 (Approved Plans), 3 (Supporting Documentation), 5 (Landscape Scheme) and 17 (Parking Allocation Scheme) of planning permission ref. 35810/APP/2023/2106 dated 25-01-2024 (Minor material amendment (s73) to vary Conditions 2 (Approved Plans) and 13 (Energy) of Planning Inspectorate decision letter dated 21-09-2022 for appeal reference APP/R5510/W/21/3288333 (LPA planning reference 35810/APP/2021/1234) for the Demolition of existing building and replacement with an up to 8-storey building comprising residential units, landscaping and amenity space) to amend the approved plans to introduce a second stair core and reconfigure the ground floor car parking and servicing arrangement.

3.1.18 Approved 07/05/2024.



3.1.19 This application was submitted consequentially to the application dismissed via appeal (ref. 35810/APP/2023/219) and was approved for the provision of one additional residential unit at ground floor level and a second stair core, as well as the removal of the previously proposed on site car parking spaces, leaving a single blue badge car parking space at ground floor.

**Application Ref. 35810/APP/2024/1651**

3.1.20 Variation of Conditions 2 (Approved Plans), 3 (Supporting Documentation), 5 (Landscape Scheme) and 13 (Energy) of Planning Inspectorate decision letter dated 21-09-2022 for appeal reference APP/R5510/W/21/3288333 (LPA planning reference 35810/APP/2021/1234) (Demolition of existing building and replacement with an up to 8-storey building comprising residential units, landscaping and amenity space) in order to: - Replace winter gardens with balconies; - Reduce car parking to provide 1no. blue badge car parking space; - Provide an additional stair core - Reconfigure ground floor service layout; and - Provide an additional 6no. units.

3.1.21 Approved 17/01/2025.

3.1.22 This S73 wrapped up the previous S73 permissions. It changed the GF layout to provide an additional unit and blue badge parking space, included a second stair core, and replaced the winter gardens with balconies, in addition to the proposed infilling of the 'stepped' roof space to provide a consistent height of 8 storeys and an additional 5 units (in the infilled segments). This brought the total number of units to 38.

**Application Ref. 35810/APP/2025/1727**

3.1.23 Section 96a application for Non-Material Amendment to planning permission reference 35810/APP/2024/1651, dated 17-01-25 (Variation of Conditions 2 (Approved Plans), 3 (Supporting Documentation), 5 (Landscape Scheme) and 13 (Energy) of Planning Inspectorate decision letter dated 21-09-2022 for appeal reference APP/R5510/W/21/3288333 (LPA planning reference 35810/APP/2021/1234) (Demolition of existing building and replacement with an up to 8-storey building comprising residential units, landscaping and amenity space) in order to amend Condition 12 (Construction Management and Logistics Plan) to allow for partial discharge, including demolition and construction phases.

3.1.24 Approved 17/07/2025.

## **3.2 Site A Padcroft Works Planning History**

**Application Ref. 45200/APP/2014/3638**

3.2.1 Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest dairy and TiGi Warehouse and comprehensive redevelopment to provide three buildings rising from three to eight storeys comprising 308



residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles.

3.2.2 Approved 06/08/2015

**Application Ref. 45200/APP/2015/4567**

3.2.3 Non-Material Amendment to application reference 45200/APP/2014/3638 (Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest dairy and TiGi Warehouse and comprehensive redevelopment to provide three buildings rising from three to eight storeys comprising 308 residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles) to allow for an amendment to the red line plan (Amendment to Condition 2; approved plans).

3.2.4 Approved 11/01/2017

**Application Ref. 45200/APP/2016/3886**

3.2.5 Variation of conditions 2 (Accordance with approved plans), 15 (Pedestrian Link) and 23 (Car Parking Stackers) of planning permission ref: 45200/APP/2014/3638 dated 10-12-2015: Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest dairy and TiGi Warehouse and comprehensive redevelopment to provide three buildings rising from three to eight storeys comprising 308 residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles, to allow for the extension of the basement car park involving the omission of car parking stackers and an infill extension between blocks to add 645sq m of additional residential floorspace.

3.2.6 Approved 11/01/2017

**Application Ref. 45200/APP/2017/327**

3.2.7 Variation of condition 2 (Accordance with approved plans) of planning permission ref: 45200/APP/2016/3886 dated 25-01-2017: Variation of conditions 2 (Accordance with approved plans), 15 (Pedestrian Link) and 23 (Car Parking Stackers) of planning permission ref: 45200/APP/2014/3638 dated 10-12-2015: Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest dairy and TiGi Warehouse and comprehensive redevelopment to provide three buildings rising from three to eight storeys comprising 308 residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles, to allow the addition of 7 residential units within the approved floorspace.



3.2.8 Approved 30/05/2017

**Application Ref. 45200/APP/2020/2603**

3.2.9 Variation of Conditions 4 (phasing drawings) and 20 (car parking) 45200/APP/2017/327 (12/10/2017) for "Variation of Condition 2 (accordance with approved plans) of planning permission ref: 45200/APP/2016/3886 dated 25-01-2017: Variation of conditions 2 (accordance with approved plans), 15 (pedestrian link) and 23 (car parking stackers) of planning permission ref: 45200/APP/2014/3638 dated 10-12-2015: Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest dairy and TiGi Warehouse and comprehensive redevelopment to provide three buildings rising from three to eight storeys comprising 308 residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles, to allow the addition of 7 residential units within the approved floorspace"; namely to reduce the number of car parking spaces from 299 spaces to 282 spaces (net decrease of 17 spaces).

3.2.10 Approved 10/11/2020

**Application Ref. 45200/APP/2023/3573**

3.2.11 Non-Material Amendment to Planning Permission ref. 45200/APP/2020/2603, dated 10-11-2020 (Variation of Conditions 4 (phasing drawings) and 20 (car parking) of 45200/APP/2017/327 (12-10-2017) for "Variation of Condition 2 (accordance with approved plans) of planning permission ref: 45200/APP/2016/3886 dated 25-01-2017: Variation of conditions 2 (accordance with approved plans), 15 (pedestrian link) and 23 (car parking stackers) of planning permission ref: 45200/APP/2014/3638 dated 10-12-2015: Demolition of all existing buildings on the site enclosed by Bentinck Road and Tavistock Road (as shown outlined in red on the submitted application site plan) including Globe House, Globe Court, Padcroft Works, the former Dairy Crest dairy and TiGi Warehouse and comprehensive redevelopment to provide three buildings rising from three to eight storeys comprising 308 residential units, 175 sqm of Class B1 floorspace, public and private amenity space, hard and soft landscaping and lower ground floor parking space for 293 vehicles, to allow the addition of 7 residential units within the approved floorspace"; namely to reduce the number of car parking spaces from 299 spaces to 282 spaces (net decrease of 17 spaces)) for play space, landscaping and lighting alterations and to amend the wording of Conditions 7 and 9.

3.2.12 Approved 08/03/2024



### 3.3 Site B COMAG I Planning History

#### **Application Ref. 24843/APP/2018/269**

3.3.1 Demolition of existing buildings (Use Class B8) and erection of 104 self-contained (20 x 1-bedroom, 75 x 2-bedroom and 9 x 3-bedroom) units (Use Class C3), Community Space (Use Class D1), and the provision of car parking, associated landscaping, drainage and other ancillary work

3.3.2 Approved 13/03/2018.

#### **Application Ref. 24843/APP/2022/2403**

3.3.3 Erection of building comprising 105 residential dwellings (Use Class C3) and 99sq.m (GIA) Community Hub (flexible Use Class E/F.1/F.2), ranging from two to seven storeys together with associated accesses, car parking, cycle parking and hard and soft landscaping.

3.3.4 Approved 18/05/2023

#### **Application Ref. 24843/APP/2024/2316**

3.3.5 Variation of Conditions 2 (Approved Plans) and 3 (Approved Documents) of planning permission reference 24843/APP/2022/2403, dated 11-06-2024 for the 'Erection of building comprising residential dwellings (Use Class C3), ranging from two to seven storeys together with associated accesses, car parking, cycle parking and hard and soft landscaping'(description amended via s96a application 24843/APP/2024/1586)'. Amendments include ground floor community hub replaced with residents' lounge and ancillary space; removal of separating wall between blocks B and C; replacing 6 x 3-bedroom 5-person residential units with 6 x 3-bedroom 4-person residential units; construction of a 6-storey rear extension; installation of external staircase from the roof terrace to level 6; replacement of glazed balcony balustrades with metal balustrades; replacement of metal panels with brick panels; reconfiguration of green roof; lobby areas to Blocks B and C rearranged; cycle store layouts amended; cycle store enclosure amended from brickwork to hit and miss brickwork; balcony and window positions amended; and lift overruns and roof vents amended.

3.3.6 Approved 31/10/2025



SECTION 4

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Proposed Development



## 4.0 Proposed Development

### 4.1 The Proposed Development

#### 4.1.1 The Application seeks consent for

*“Demolition of existing building and replacement with a 6-storey building comprising residential units, landscaping and amenity space.”*

4.1.2 The Proposed Development is largely reflective of the previous proposal granted via appeal (ref. APP/R5510/W/21/3288222) in September 2022 and amended most recently via S73 in January 2025 (ref. 35810/APP/2024/1651), which proposed the demolition of the existing building and its replacement with an up to 8-storey building comprising residential units and associated car parking, landscaping and amenity space. This permission was not implemented and lapsed on 20 September 2025. The Application proposes to lower the scheme by two storeys, with a resultant decrease in the number of units proposed from 38 to 31.

4.1.3 The proposed height is limited to 6 storeys owing to deliverability challenges posed by multiple issues. These include but are not necessarily limited to: increasing development costs (such as materials, labour and interest rates), stricter funding criteria due to volatility of the economy, flatlined sales values, and regulatory requirements such as the Building Safety Regulations’ Gateway process causing significant delay (and thus cost) and the soon to be introduced Building Safety Levy.

4.1.4 At the time the original application was prepared and submitted, the current Gateway regime had not been fully implemented nor reasonably foreseeable in its present form. The scheme was therefore conceived, designed and viability-tested in a policy and regulatory context that did not include the extent of upfront design resolution, approval risk, and occupation constraints now required under the new regime.

4.1.5 Following the introduction of these requirements, the Applicant sought to proactively engage with and respond to the evolving regulatory framework. This included exploring the delivery of the original permission in full compliance with Gateway 2 and Gateway 3, factoring in the need for enhanced technical design, extended consultant input, and revised programme assumptions. However, through this process it has become clear that the cumulative impact of these requirements renders the original scheme unviable in both financial and delivery terms.

4.1.6 In particular, Gateway 2 introduces a significantly more onerous pre-construction approval stage, requiring a fully coordinated and detailed technical design prior to commencement. This results in substantial additional upfront cost, extended pre-development periods, and a delay in the efficient deployment of development funding. Critically, uncertainty around approval timeframes introduces programme risk that is reflected in increased financing costs, contractor pricing, and contingency allowances.



- 4.1.7 Gateway 3 further compounds this position by preventing occupation until full regulatory sign-off is achieved. This fundamentally alters the scheme’s cashflow profile, increasing exposure to delay at the point of revenue realisation and, in turn, reducing funder appetite and tightening lending terms. The combined effect is a material deterioration in the scheme’s viability when compared to the assumptions underpinning the original consent.
- 4.1.8 In response, the Applicant has undertaken a comprehensive reassessment of the development and has brought forward a revised scheme which no longer falls within the definition of a ‘Higher-Risk Building’ and is therefore not subject to the Gateway 2 and 3 processes. This has necessitated a reduction and reconfiguration of the development, including changes to building height, massing and overall unit numbers.
- 4.1.9 While this results in a marginally lower overall development quantum and reduced gross development value, the amended proposals represent a far more certain and deliverable scheme in the current regulatory and market context. The decision to move away from the original Gateway-triggering scheme is not one of design preference, but a necessary response to a fundamental and unforeseen shift in the regulatory environment.
- 4.1.10 The revised scheme ensures that the site can be brought forward within a realistic timeframe, delivering new homes without the significant delivery risks associated with the Gateway regime. In this context, the reduction in scale should be balanced against the clear benefit of securing a viable, policy-compliant and implementable form of development.
- 4.1.11 A description of the design and layout of the Proposed Development is set out within the accompanying Design and Access Statement, with a summary of the proposals set out below.

4.2 Unit Mix

4.2.1 The Proposed Development provides a variety of unit sizes, as presented in Table 1 below.

Table 1: Proposed Residential Unit Mix

Housing Type	Number of Units	Percentage
1-bed 1-person	8	26%
1-bed 2-person	9	29%
2-bed 3-person	4	13%
2-bed 4-person	6	19%
3-bed 4-person	4	13%
<b>TOTAL</b>	<b>31</b>	<b>100%</b>

4.2.2 Three of the units will be Part M4(3) wheelchair accessible (10%). These units are located at ground floor level, as shown on the submitted floorplans.



## 4.3 Design and Layout

- 4.3.1 The Proposed Development delivers a high quality design, which will improve the Site's appearance and integrate the scheme with the surrounding schemes at Padcroft Works and COMAG I.
- 4.3.2 The proposed building is six storeys in height. The southern elevation, along Tavistock Road, incorporates set backs to provide articulation and visual interest. The ground floor units on this elevation benefit from on street entrances, via private terraces, which together with the main entrance, located centrally in the building, creates an active frontage to the street.
- 4.3.3 The main entrance from Tavistock Road provides a direct route for residents in to a central lobby, with the stair and lift core providing internal access to all floors being accessed from this lobby. Two lifts are proposed, both being appropriately sized for evacuation purposes in the event of a fire.
- 4.3.4 The southern elevation also provides access to the single internal parking space, provided for blue badge holders. Access for cyclists using the secure internal cycle store is through the refuse store, which provides a straight route through to the cycle store.
- 4.3.5 On the northern elevation, facing Padcroft Works, the building is set back at all levels from first floor upwards, providing separation from the neighbouring building.
- 4.3.6 35% of the units are fully dual aspect, and all single aspect units are south facing and achieve a secondary aspect through the use of side windows or doors.
- 4.3.7 All units will be designed to comply with nationally described space standards.
- 4.3.8 The appearance of the building will be in keeping with the neighbouring developments, utilising a similar and complementary material palette.

## 4.4 Landscaping and Amenity Space

- 4.4.1 Private amenity space in the form of balconies, or terraces at ground floor, is proposed to each unit. All private amenity space meets minimum required space standards.
- 4.4.2 Communal amenity space is provided at ground floor level, first floor level and roof level. The ground floor provides a courtyard with informal seating and green wall, whilst the first floor podium level provides a woodland garden with raised planters and multi-stem canopy trees, and seating areas for resident use.
- 4.4.3 At roof level, a generous communal terrace with lawn area is proposed providing space for residents to sit and relax. Planters provide the opportunity for residents to plant herbs and dwarf fruit trees.



- 4.4.4 Communal play space is also proposed at sixth floor roof level, with play features suitable for toddlers through to young juniors and seating for parents to sit and watch over the play space. A picnic area is proposed, alongside raised planters with trailing plants providing sensory play opportunities.
- 4.4.5 Glazed screens are proposed to the sixth floor roof area to provide privacy both to occupants of the Proposed Development and occupants of the neighbouring schemes.
- 4.4.6 The sixth floor roof terrace also provides space for an area of ecologically rich wildflower planting. Additionally, biodiverse seeded green roofs are proposed on this level, as well as at first floor podium level.
- 4.4.7 At street level, private terraces are delineated from the adjacent public realm by raised planters and green screens.
- 4.4.8 Proposed on site amenity space is set out in Table 2 below.

**Table 2: Proposed On Site Amenity Space**

Amenity	Area (sqm)
Private	184.6
Communal – Ground Floor	17
Communal – First Floor	84.4
Communal – Sixth Floor	294.1
<b>TOTAL</b>	<b>580.1</b>
<b>Average per unit</b>	<b>18.7</b>

- 4.4.9 The Site is also in close proximity to parks and children’s play areas, including Yiewsley Recreation Ground to the north, Stockley Country Park to the north east, and Thorney Park to the west.
- 4.4.10 The Proposed Development has been designed to include a high quality landscaping scheme that seeks to maximise the level of urban greening that can be achieved. The development will achieve an Urban Greening Factor score of 0.4 as set out in Table 3 below.



Table 3: Urban Greening Factor

Surface Cover Type	Factor	Area (sqm)	Contribution
Semi-natural vegetation (e.g. woodland, flower-rich grassland) created on site.	1	32.6	32.6
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	0.8	64	51.2
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket)	0.7	50.7	35.49
Flower-rich perennial planting	0.7	138.9	97.23
Green wall –modular system or climbers rooted in soil	0.6	36	21.6
Amenity grassland (species-poor, regularly mown lawn).	0.4	20.6	8.24
Permeable paving	0.1	275.8	27.58
Total Contribution			273.94
Total Site Area			677
<b>URBAN GREENING FACTOR</b>			<b>0.404</b>

4.4.11 With regard to Biodiversity Net Gain (BNG) requirements, the scheme is the subject of the de-minimis exemption, as the Site currently consists of one building with adjacent hardstanding and therefore currently has a biodiversity value of 0. As such, no biodiversity will be impacted by the Proposed Development and therefore it is not subject to the mandatory requirement to achieve a 10% increase in BNG. Further details are provided within the submitted Ecological Appraisal.

#### 4.5 Access and Parking

4.5.1 The Proposed Development is car free. One parking space is provided, which is allocated for blue badge holders. This space is at grade, within the building and is accessed from Tavistock Road.

4.5.2 The proposals also provide 67 cycle spaces for residents, within a secure internal cycle store which is accessed from Tavistock Road via the refuse store. Space is provided for both standard cycles, using double stacker cycle stands, and for larger cargo / adapted cycles.

4.5.3 4 short stay cycle spaces for visitors are provided adjacent to the main residential entrance on Tavistock Road.

4.5.4 A car club parking space will be made available on Tavistock Road, subject to securing the necessary TRO. The car club provider will be secured via contractual arrangement.



4.5.5 There are currently four metered car parking spaces adjacent to the Site, on Tavistock Road, and arrangements for their use will remain unaltered by the proposals.

## 4.6 Refuse and Servicing

4.6.1 The refuse store is located centrally on the southern side of the building, with direct access from Tavistock Road. Refuse collection will remain unaltered by the proposals and will take place from Tavistock Road, as is currently the case.

4.6.2 Servicing will be from on street, in Tavistock Road.

## 4.7 Energy and Sustainability

4.7.1 The energy strategy for the Proposed Development capitalises on passive design measures to maximise the energy efficiency and reduce energy demand, with mechanical ventilation and heat recovery proposed to reduce the demand for heating and cooling.

4.7.2 Air source heat pumps will serve space heating and domestic hot water, maximising on site CO2 reduction.



SECTION 5

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Relevant Planning Policy



## 5.0 Relevant Planning Policy

### 5.1 The Development Plan

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires decisions to be made in accordance with the adopted Development Plan unless material considerations indicate otherwise.

5.1.2 The adopted Development Plan relevant to the Site comprises the following:

- The London Plan (LP) – The Spatial Development Strategy for Greater London (March 2021);
- The Hillingdon Local Plan: Part 1 – Strategic Policies (2012);
- The Hillingdon Local Plan: Part 2 – Development Management Policies (2020); and
- The Hillingdon Local Plan: Part 2 – Site Allocations & Designations (2020).

5.1.3 Within this Statement, the Hillingdon Local Plan Parts 1 and 2 are collectively known as the Local Plan.

5.1.4 Relevant planning policies from the Development Plan are summarised at Appendix A.

### 5.2 Other Material Planning Considerations

5.2.1 The following material planning considerations also apply to the Site:

- National Planning Policy Framework (NPPF) (2024);
- National Planning Practice Guidance (PPG);
- Hillingdon Planning Obligations (2014);
- Accessibility Hillingdon SPD (2017);
- Housing SPG (2016);
- Housing Design Standards LPG (2023);
- Planning permission (Ref. 35810/APP/2021/1234) and subsequent S73 planning permissions.

#### **Planning Permission 35810/APP/2021/1234 and subsequent S73 permissions**

5.2.2 A further material consideration is represented by the lapsed Appeal Permission and subsequent Section 73 permissions for the Site (“the Lapsed Permission”), given this permission has only recently expired (September 2025) and since the current statutory framework (the adopted Development Plan as shown in 5.1.2 above) remains the same.



5.2.3 Whilst reviews are underway for both the London Plan and Hillingdon Local Plan, neither are sufficiently progressed as to carry weight and make a material difference in the decision-making process.

5.2.4 Although the NPPF has been updated since the Appeal Permission and Section 73 permissions were granted, the updates within have not been sufficiently significant as to result in an outcome against the proposal. In fact, the latest version of the NPPF (2024) lends increased support to the previous versions of the document in relation to the weight to be afforded towards brownfield development.

**National Planning Policy Framework (2024)**

5.2.5 The NPPF establishes the Government's overarching national strategic planning objectives, forming a material consideration in the planning process.

5.2.6 A presumption in favour of sustainable development sits at the centre of the NPPF. This is underpinned by three overarching objectives:

- Economic: building a strong, responsive and competitive economy, through ensuring that sufficient land of the correct type is available in the right places and at the right time, supporting growth, innovation and productivity;
- Social: supporting strong, vibrant and healthy communities, by ensuring that sufficient quantum and range of homes is provided to meet current and future needs, by fostering well designed, beautiful and safe places and providing accessible services and open spaces to support community's needs; and
- Environmental: protecting and enhancing the natural, built and historic environment.



SECTION 6

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Planning Assessment



## 6.0 Planning Assessment

6.1.1 This section of the Planning Statement considers the relevant planning matters arising from the Proposed Development and how the Proposed Development responds to these matters.

6.1.2 The following matters are relevant to the proposal:

- The Principle of the Development;
- Comprehensive Development;
- Housing;
- Design;
- External Amenity Space;
- Heritage, Townscape and Visual Impact;
- Daylight and Sunlight;
- Noise;
- Transport;
- Refuse and Servicing;
- Flood Risk and Drainage;
- Ground Contamination;
- Air Quality;
- Fire;
- Biodiversity, and
- Energy and Sustainability.

## 6.2 The Principle of the Development

6.2.1 The Site currently comprises a part one, part two storey building in office use (Use Class E) with adjacent areas of hardstanding. It is a low density, under-utilised brownfield site in a Town Centre location, capable of achieving a considerably greater amount of development. It is in a sustainable location, close to a range of local services and transport links at West Drayton railway station and a number of local bus stops. Whilst the Site is afforded a PTAL rating of 3, this is not reflective of the level of fast and regular public transport services in the vicinity.



- 6.2.2 The principle of residential development on the Site is well established, with a strong and supportive policy context. The NPPF states the importance of a sufficient amount and variety of land being brought forward for development where needed, lending support to the Government's objective of significantly boosting the supply of homes (para. 61). It gives great weight to the benefits of re-using previously developed land, and substantial weight to the value of using suitable brownfield land for homes and other identified needs (para. 125), stating that such proposals should be approved unless they cause substantial harm.
- 6.2.3 The NPPF also recognises the important contribution that small and medium sized sites can make to meeting housing requirements, encouraging Local Planning Authorities (LPAs) to promote the development of a good mix of sites (para. 73).
- 6.2.4 LP Policy H1 states that Boroughs should optimise the potential for housing delivery on all available and suitable brownfield sites, and the principle of residential development on the Site is confirmed by Policy SA 38 of the Local Plan, which allocates it for "*residential led development*", with no reference to any requirement for re-provision of the current office use.
- 6.2.5 The site is approximately 0.7ha in size, and therefore LP Policy H2 applies, which encourages LPAs to actively support well designed new homes on small sites in order to support medium sized housebuilders. The LP sets a target of 295 new homes being delivered per annum on small sites. The provision of 31 new homes makes a positive contribution towards meeting this target.
- 6.2.6 Hillingdon has a housing target of 1,083 homes per annum over the 10 year period of the Local Plan, with Policy H1B(2) setting a list of criteria to achieve this target. The Proposed Development complies with this policy, by optimising housing delivery on a suitable and available brownfield site, in particular criteria a) ("*sites with existing or planned public transport access levels (PTALs) 3 – 6 or which are located within 800m distance of a station or town centre boundary*") and criteria e) "*small sites*".
- 6.2.7 To summarise, the site is a small brownfield site, in a Town Centre location with access to a range of local facilities, amenities and public transport options. The Proposed Development makes effective use of a currently under utilised site, optimising the land with residential development and therefore meeting the policy objectives of both the NPPF and LP. Further, it fully complies with the Local Plan site allocation at Policy SA38, proposing the residential use for which it is allocated.
- 6.2.8 The Lapsed Permission granted residential development on the Site and had been assessed against the same Development Plan framework as currently remains in force and was found to be compliant with this framework. As such, the principle of residential development is further supported by this permission.



### 6.3 Comprehensive Development

- 6.3.1 The NPPF discourages the delivery of homes being built at low densities where there is a shortage of land for meeting identified housing needs, instead stating the importance of making optimal use of the potential of each site (para. 130). This requirement to make optimal and effective use of land is reflected in LP Policy H1B and Standard 6 of the Housing SPG.
- 6.3.2 The principal planning policy for the Site within the Local Plan is Policy SA38, which supports the need to deliver the appropriate density of development on the Site, stating “As a preference, Sites A, B and C should form a comprehensive redevelopment scheme across the whole site”.
- 6.3.3 The Proposed Development effectively utilises an available piece of land, optimising the Site’s capacity. The proposed density on the Site has been influenced by the surrounding context within the allocated area, on Site A (Padcroft Works) and Site B (COMAG I). The Proposed Development will benefit from the immediate surrounding context, in terms of height, scale, layout and living conditions, whilst also being cognisant of constraints posed by the neighbouring developments, such as neighbouring amenity.
- 6.3.4 The allocated site will complete the comprehensive development of the allocated Padcroft Works and COMAG site, integrating with and complementing development on Sites A and B.

### 6.4 Housing

#### Housing Mix

- 6.4.1 The Housing SPG supports the provision of a choice of housing based on local need, with the LP Policy H10(6) promoting a mix of housing to meet local needs, stating that within highly sustainable locations, a higher proportion of one and two bed units is generally considered to be acceptable. Supplementary text to Local Plan Policy DMH2 states a need for three bed units.
- 6.4.2 The Hillingdon Strategic Housing Market Assessment (2025) (“SHMA”) demonstrates its highest need in relation to housing is for 2 bedroom and 3 bedroom units, the required levels of which are stated as being 26% and 42% respectively.
- 6.4.3 The proposed mix of units is set out below:
  - 1-bed 1-person: 8 units (26%)
  - 1-bed 2-person: 9 units (29%)
  - 2-bed 3-person: 4 units (13%)
  - 2-bed 4-person: 6 units (19%)
  - 3-bed 4-person: 4 units (13%)
- 6.4.4 The Padcroft Works and COMAG I sites predominantly deliver one and two bed units, with a lower proportion of three bed units, and as such the housing mix of the Proposed Development is largely reflective of that already approved on the other sites within the SA38 allocation.



- 6.4.5 The proposed housing mix is supported by policy, and is also broadly in line with the mix accepted through earlier approved planning applications for the Site.
- 6.4.6 32% of the proposed residential units will be 2-bed units, in excess of the level shown as being required through the recent SHMA, and similarly 32% will be units capable of accommodating 4 persons, providing a valuable contribution to family sized housing.
- 6.4.7 The scheme proposes a range of housing choices, from 1-bed 1-person to 3-bed 4 person, with the mix being appropriate to the Site's sustainable location and supported by policy in this regard. Being broadly reflective of the mix on both Padcroft Works and COMAG I, it assists with the provision of a mixed and balanced community across the allocation, supporting a comprehensive redevelopment.

#### **Accessible Units**

- 6.4.8 Paragraph 115 of the NPPF stresses the importance of safe and suitable access for all users of a site, a principle that is reinforced in the Housing SPG (Standard 11), requiring all residential units to be built to Part M4(2) of the Building Regulations 2010 (as amended) and 10% of all units to be built to Part M4(3) standards. LP Policy D5 also encourages inclusive design and the provision of suitable housing and housing choice for London's population, including disabled people (Policy D7).
- 6.4.9 The units are designed to be inclusive and accessible. 3 units (10%) are wheelchair accessible, all of which are located at ground floor level for increased accessibility. All remaining units are designed in accordance with the Mayor's housing standards.
- 6.4.10 As such, the Proposed Development fully complies with the requirements of both national and regional planning policy in relation to accessible units.

#### **Affordable Housing**

- 6.4.11 Policy H4 of the LP requires development to deliver the maximum reasonable amount of affordable housing possible without compromising viability and deliverability. All major development is to deliver affordable housing through the threshold approach, which is set out at Policy H5. The threshold approach is set at a minimum of 35% affordable housing, subject to viability testing. Local Plan Policy H2 directly replicates this requirement, with sites with a capacity of 10 or more units being directed to provide 35% affordable housing subject to viability.
- 6.4.12 A Development Viability Report is submitted as part of the Application, which demonstrates that due to viability, no affordable housing can be provided as part of the Proposed Development. Further details are set out within the report.

## **6.5 Design**

- 6.5.1 All national, regional and local planning policies attach great weight to design. The NPPF particularly establishes that great importance is given to the design of the built environment and recognises that it is a key aspect of sustainable development (para. 131).



6.5.2 LP Policy D4 and Local Plan Policy DMHB11 similarly require new development to be of a high quality design and to enhance the built environment, taking into account physical context, local character, density, tenure and land mix. Developments are expected to incorporate high quality materials and appropriate landscaping to ensure a positive contribution to streetscape.

6.5.3 The design of the scheme is in keeping with the previously approved designs for the Site, which were arrived at as a result of extensive pre-application consultation. The design reflects the context of its location, and utilises the development framework set by Padcroft Works and COMAG I and being complementary to their established design standards, such as height, massing and layout, ensuring the completion of the comprehensive redevelopment of the site allocation.

6.5.4 The design of the Proposed Development has given consideration to the surrounding townscape in order to complement the scale, landform and pattern of the local context.

#### **Height and Massing**

6.5.5 LP Policy D9 defines tall buildings as “6 storeys or 18 metres measured from ground to the floor level of the uppermost storey”. The building’s height to the floor level of the uppermost storey (fifth floor) is 15m and, as such, it is not classed as a tall building.

6.5.6 At six storeys in height, the Proposed Development sits comfortably within the context of Padcroft Works and COMAG I, with their approved heights of up to eight or seven storeys respectively. The proposals for the Site continue a comprehensive approach to height across the site allocation, and its height is appropriate for its Town Centre location.

6.5.7 The Lapsed Permission was for an eight storey building, which demonstrates that there is sufficient capacity on the Site to accommodate a proposal of more than six storeys. As such, the Proposed Development is readily acceptable with regard to height.

6.5.8 As with height, the bulk and massing of the Proposed Development has been developed based on both the previously approved schemes for the Site and the immediate surrounding context of Padcroft Works and COMAG I, as well as the character and appearance of the surrounding area. The lapsed permission was shown to sit comfortably in the townscape along Tavistock Road. Therefore, it follows that the capacity exists for the smaller proposed building, which will appear as an extension to the approved COMAG I scheme, whilst enhancing the streetscape alongside.

6.5.9 Along Tavistock Road, the façade is rhythmical on either side of the central core, achieved through similar vertical components mirroring each other on each side. The proposed massing has been sculpted to minimise impact on Padcroft Works to the north, being a similar height to the building to the east.

6.5.10 The height and scale of the Proposed Development have been carefully considered to match the adjacent structures, preventing any adverse visual impact and maintaining the overall massing and established height within the area.



### Density

- 6.5.11 Local Plan Policy DMHB17 guides site density, setting a density range of up to 250 units / hectare for the Site's location (West Drayton Town) (Table 5.2 of the Local Plan). The Proposed Development, at 442 units / ha, exceeds this upper number, although the figure set by DMHB17 is stated as to be used as a starting point for density, which should ultimately be determined through the design led process.
- 6.5.12 It should be noted that there was specific comment in the Inspector's report for the Appeal Permission in relation to the application of Policy DMHB17, which stated that whilst policy wording was that standards would be applied as set out in Local Plan Table 5.2, supporting text to the policy stated that this standard would be applied flexibly and that density would ultimately be determined by a design. The Inspector's report goes on to state that LP Policy D2 excludes numerical standards in relation to density, stating that density should be proportionate to the connectivity and accessibility of the site, and that the allocation within which the Site is located (SA38), defines densities only for Sites A and B, stating that for Site C, density should be determined by design.
- 6.5.13 LP Policy D3 requires development to optimise site capacity to ensure that it is appropriate in form and land use when account is taken of the building's context. High density development is promoted in locations that are well connected to services, jobs, infrastructure and amenities by public transport.
- 6.5.14 The proposal has followed a design led approach, and is based on the Site's capacity to accommodate appropriate height and mass and the policy requirement to deliver a comprehensive regeneration. It is in a sustainable location, with good connections to jobs, services and infrastructure both locally and via public transport, and these elements together with the Site's allocation result in the density being entirely appropriate.

### Layout

- 6.5.15 The Proposed Development appears as an extension to the approved COMAG I building, continuing the building line along Tavistock Road and turning at the site entrance to Padcroft Works, presenting as a gateway building.
- 6.5.16 The layout has been developed to optimise the capacity of the site, with due consideration given to the nearby properties of Fitzroy Court and Yardley Court on Padcroft Works.
- 6.5.17 Standard 28 of the Housing SPG requires design proposals to demonstrate how habitable rooms within each unit are provided with adequate light levels of outlook and privacy in relation to neighbouring properties. Habitable rooms both within the Proposed Development and in the adjacent buildings have been given extensive consideration in the development of the design for the Site, whilst acknowledging precedents established elsewhere within the SA38 allocation.



- 6.5.18 Separation distances to Padcroft Works and COMAG I remain the same as those previously consented for the Site, with the Proposed Development being consistent with the development framework of the site allocation.
- 6.5.19 In relation to internal layout, Standard 12 of the Housing SPG requires each core to be accessible by no more than eight units. The building proposes a single core, serving six units on floors 3 – 5, 5 units on floors 1 and 2, and three units at ground floor level.
- 6.5.20 The single core provides two evacuation lifts alongside stairs, and is easily accessible from the front entrance.
- 6.5.21 The internal layout is such that much of the northern elevation comprises the communal access corridor on all floors, which ensures that the majority of habitable rooms within the residential units are either south, east or west facing. This allows maximum daylight and sunlight levels and also creates good levels of outlook which avoids conflict with neighbouring developments.
- 6.5.22 Floor layouts seek to maximise efficiency of the small site, constrained by the surrounding developments. In accordance with the Housing SPG (Standard 29), single aspect units are minimised and there are no north facing single aspect units. Where single aspect is unavoidable, these units are located to be south facing to maximise sunlight and daylight as far as is practicable, and benefit from a side window or door providing an additional aspect.
- 6.5.23 All units meet or exceed minimum internal space standards, which are set by LP Policy D6 and Standard 24 of the Housing SPG, as well as by Nationally Described Space Standards.

## **Materials**

- 6.5.24 The proposed palette of materials emphasises the corner aspect of the Site, and draws on the heritage and industrial past of the Site. Materials and elevational detailing is influenced by the Padcroft Works and COMAG I buildings, and is selected to complement the neighbouring schemes to achieve a seamless collection of the three sites, an objective set out in the SA38 site allocation. Further details on materials can be found in the submitted Design and Access Statement.

## **6.6 Heritage, Townscape and Visual Impact**

- 6.6.1 The Site does not contain any heritage assets and does not fall within a Conservation Area.
- 6.6.2 There are four listed buildings and six non-designated heritage assets within a 500m radius of the Site. The significance of these heritage assets has been assessed as well as the heritage impact from the Proposed Development.
- 6.6.3 Paragraph 208 of the NPPF requires planning applications to assess the significance of heritage assets affected by a proposal and paragraph 216 reflects the same requirement for non-designated heritage assets. LP Policy HC1 requires developments affecting heritage assets or their settings to conserve their significance, with Local Plan Policies SO1, SO2, HE1 and BE1



all requiring new development to have regard to impact on heritage assets and to be of a high quality design to maintain and enhance the contribution they make to the area.

- 6.6.4 None of the listed buildings or non-designated heritage assets are visible from the Site. The Proposed Development will have a neutral impact on three of the listed buildings, and no impact on the setting of the remaining heritage assets, thereby preserving the setting and significance of surrounding listed buildings.
- 6.6.5 In terms of townscape and visual impacts, the Proposed Development has a negligible effect, with a low beneficial impact looking north west along Tavistock Road due to its design complementing the scale, landform and pattern of the surrounding townscape.
- 6.6.6 The Proposed Development will respect and enhance the townscape character and historic environment, responding to local context, scale and character.
- 6.6.7 Further details can be found within the submitted Heritage, Townscape and Visual Impact Assessment.

## 6.7 External Amenity Space

- 6.7.1 Local Plan Policy DMH18 sets out the minimum provision of private outdoor amenity space. For one bed units this is set at 20sqm, increasing to 25sqm for two bed units and 30sqm for three bed units. The supporting text to the policy clarifies that communal provision of private outdoor space is generally not supported unless there are strong planning reasons, and the scheme is of a high quality with clear planning merits. In order to comply with this policy, the scheme would be required to provide a total of 710sqm.
- 6.7.2 The Housing SPG (Standard 27) is more realistic in its expectations for external amenity space, requiring 5sqm for 1-2 person dwellings, and an extra 1sqm for each additional occupant, and a minimum depth of 1500mm.
- 6.7.3 Due to the constrained nature of the Site, the minimum areas set by the LP cannot be achieved. Notwithstanding this, private amenity space is provided to all units in accordance with or in excess of the standards set by the Housing SPG, and the proposal is of a high quality with clear planning merits.
- 6.7.4 Communal external amenity space is provided in three locations within the Proposed Development: a ground floor courtyard informal seating area, a woodland garden at first floor podium level, and a sixth floor roof terrace. In total, 395.5sqm of communal external amenity space is proposed, and 184.6sqm of private external amenity space in the form of balconies or terraces, providing an average of 18.7sqm per unit. Whilst this falls short of the requirements of Policy DMH18, it far exceeds the guidelines within the Housing SPG.



- 6.7.5 The shortfall against Local Plan requirements comes as a result of amenity provision competing with other policy requirements, including making the most effective use of land through the provision of an appropriate density and providing a scheme that fits with the neighbouring schemes and is in compliance with SA38. In order to achieve policy requirements in terms of private external amenity, a reduction in development quantum would be required, with a lower density that does not make optimal use of the Site.
- 6.7.6 In addition, public provision of open space within walking distance of the Site is available at the nearby regional park and at Yiewsley Recreation Ground, providing an alternative to on site provision.
- 6.7.7 The Inspector's report for the Appeal Permission recognised a shortfall in the amount of amenity space proposed, stating that the consideration should be made of the Site's context and constraints as well as the quality of the proposed external space. It stated that the design, including the children's play space, provided pleasant spaces, with the proposed planting affording screening both to and from neighbouring windows. The spaces would also be shielded from noise from the nearby railway line. Whilst the first floor space would be in shade for part of the day, this was readily offset by the provision of the rooftop amenity space ensuring a choice of amenity spaces were provided. The ground floor amenity space, whilst small, provided a useful meeting point and the enclosed balconies provided generous areas of private open space. The report also acknowledged that there were several areas of public open space in close proximity to the Site, within a short walking distance for occupants of the development and complementing the on site provision. It confirmed that the relatively small nature of the proposed scheme would put limited pressure on the local areas of open space.
- 6.7.8 In relation to amenity space, the report concluded that whilst the quantity of open space proposed by the development was lower than required by policy, once the design requirements and constraints of the site were taken in to account, the external amenity space proposed was good quality and was appropriate and adequate for the needs of future occupiers. As a result the proposal was in compliance with Policy DMHB18 in that the development provided good quality and useable private outdoor amenity space.
- 6.7.9 The policy context against the Inspector's assessment was made has not changed, and therefore remains valid for the amenity space which is offered as part of the Proposed Development.

### **Play Space**

- 6.7.10 10sqm of play space should be provided for each child in accordance with Local Plan Policy DMCI5 and LP Policy S4. Local Plan Policy DMH18 requires new major development that will result in an occupancy of ten children or more to provide play facilities on site, and where a satisfactory provision cannot be achieved on site, a financial contribution towards the improvement of existing play facilities in the local area will be sought.



6.7.11 The GLA population yield calculator estimates that the Proposed Development will yield 5.5 children (aged 0-16) and therefore would require 55sqm of play space to be provided on site. The Proposed Development will deliver 108.5sqm of play space on site, considerably in excess of requirements.

## 6.8 Daylight and Sunlight

6.8.1 Supporting text to Local Plan Policy DMHB11 states that the Council will seek to ensure that the design of new development optimises levels of daylight and sunlight, and that development proposals should not impact on the amenity, daylight and sunlight of adjacent properties or open space. The Housing SPG (Standard 32) seeks for all homes to have direct sunlight to at least one habitable room for part of the day, with a preference for kitchen dining spaces and living areas receiving direct sunlight.

6.8.2 The NPPF (para. 130 (d)), however, stipulates that development should be refused if it fails to make efficient use of land, and in this context that when considering applications for housing, a flexible approach should be taken in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site.

6.8.3 The internal layout of the Proposed Development seeks to optimise sunlight and daylight levels to habitable rooms.

6.8.4 A Daylight and Sunlight Assessment is submitted as part of the Application, which assesses both internal daylight and sunlight and that of neighbouring buildings. The assessment finds that, for neighbouring buildings at Padcroft Works, the majority of assessed windows meet BRE guidance in relation to Vertical Sky Component, with those that do not generally being set within recessed balconies or already experiencing low levels of skylight visibility. When the BRE accepted mirror-image test is applied, the number of transgressions fall to 3. All units which were able to be assessed using the No Sky Line test passed BRE guidance levels. The results demonstrate an improvement when compared to the Lapsed Permission

6.8.5 Sunlight to neighbouring open spaces has also been assessed using the BRE accepted sunlight hours test. The results show that 10 of the 17 spaces assessed meet the BRE guidance in full, and where the guidance is not met, this is largely due to the design of the neighbouring buildings, where large balconies already limit the existing sunlight levels.

6.8.6 The new residential units will benefit from daylight levels in excess of BRE requirements.

6.8.7 Further details can be found in the submitted report, which confirms that Policy DMHB11 and Standard 32 of the Housing SPG will be met. Where there are shortfalls in daylight or sunlight, a flexible approach should be taken in accordance with the NPPF to support the efficient use of the Site. The Proposed Development has been designed to make the most effective use of the Site, using an available piece of brownfield land and ensuring a development that not only completes the site allocation but complements those buildings already consented or delivered as part of the allocation.



## 6.9 Noise

- 6.9.1 Local Plan Policy EM8 seeks to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately mitigated, which is reflected in both LP Policy D14 and Paragraph 187 of the NPPF. Further guidance on noise control is also set through the LB Hillingdon, Hounslow and Richmond upon Thames Development Control for Noise Generating and Noise Sensitive Development SPD, which seeks to achieve noise standards as defined by BS 8233:2014.
- 6.9.2 A Noise Impact Assessment has been undertaken in accordance with the aforesaid SPD, which determines the suitability of the Site for its proposed use.
- 6.9.3 The Noise Impact Assessment has determined the impact of any existing noise sources on the Proposed Development, including both within the residential units and on its external amenity spaces, as well as the potential for noise emissions from any proposed mechanical services plant and equipment.
- 6.9.4 The Noise Impact Assessment concludes that potential adverse impacts to residential units can be adequately mitigated through design and construction materials to ensure that externally generated noise will not be detrimental to future residential occupants.
- 6.9.5 Communal external amenity areas which achieve noise levels below the maximum guidelines, will be available to residents. This will offset higher noise levels that may be experienced at times on the private balconies / terraces, being located on the southern elevation adjacent to Tavistock Road. . It should be noted that the guidance affords flexibility when considering outside amenity space, and the benefit of this space being available for use outweighs the alternative of not having this space.
- 6.9.6 It should be noted that the Lapsed Permission included balconies/terraces along the Tavistock Road elevation with comparable noise levels expected, which was considered acceptable given the transitory nature of these spaces.

## 6.10 Transport

- 6.10.1 Local Plan Policy DMT5 requires safe, direct and inclusive provision of access for pedestrians and cyclists on the site, connecting it to the wider network, and Policy DMT2 requires proposals to provide safe and suitable access for all users.
- 6.10.2 Pedestrian and cycle access will be taken directly from Tavistock Road. The main entrance to the building is located centrally along the southern elevation (Tavistock Road), as a clear and legible front entrance.
- 6.10.3 Cyclists will access the building adjacent to the main entrance, with a direct route to the 67 space cycle store provided through the refuse store. Cycle spaces are provided for both standard sized and cargo/adapted cycles. In addition, four cycle spaces are provided as short stay spaces for visitors, again adjacent to the main pedestrian entrance and cyclists entrance.



- 6.10.4 Pedestrians will benefit from the good quality and well lit local footpath network which includes dropped kerbs, tactile paving and pedestrian crossings. The nearest cycle lanes are provided on the High Street as part of local cycle route 89.
- 6.10.5 LP Policy T6.1 sets out maximum parking standards for new residential development, and allows for car club spaces to be provided in lieu of private parking in developments located outside of the Central Activities Zone. Blue badge parking is to be provided to new residential developments, with those that propose ten or more units being required to ensure that there is at least one designated parking space for 3% of the dwellings. This would equate to 0.93 parking spaces for the Proposed Development. These spaces are to be located within easy access of the entrance to the building and preferably be level access.
- 6.10.6 Similar to LP Policy, Local Plan Policy DMT6 sets maximum parking standards, with no minimum level.
- 6.10.7 The Proposed Development is car free, with the exception of one parking space being provided for blue badge holders. This space is integrated to the ground floor of the development, with access to the building being obtained either via exiting on to Tavistock Road and using the main residential entrance, or directly in to the building via the rear of the parking space. As such, the requirements of LP Policy T6.1 are met. The parking strategy for the Site is reflective of that proposed by the Lapsed Permission.
- 6.10.8 A car club space is proposed adjacent to the building on Tavistock Road, to be secured via Section 106.
- 6.10.9 In terms of cycle parking, the cycle standards set out in the Development Plan and LP are:
- Local Plan (Maximum standards)
    - Studio/1 bed/2 beds: 1 space
    - 3 beds +: 2 spaces
  - LP (Minimum standards)
    - Studio/1B1P: 1 space
    - 1B2P: 1.5 spaces
    - 2B+ : 2 space /
    - (Short term) 5 to 40 dwellings: 2 spaces
- 6.10.10 The Proposed Development provides 67 long stay cycle spaces in a secure cycle store at ground floor level. This provision is in excess of both Local Plan and LP minimum standards.
- 6.10.11 Four short term cycle spaces are provided at street level on Tavistock Road next to the building entrance, again in excess of required standards.
- 6.10.12 Further details on access and parking can be found in the submitted Transport Statement (TA).



- 6.10.13 Local Plan Policy DMT1 requires proposals to be accessible by sustainable modes of travel and have no significant adverse transport or associated air quality and noise impacts on the wider area, whilst Policy DMT4 may require developers to mitigate transport impacts from development proposals by improving local public transport facilities and services.
- 6.10.14 Being car free, there will be no adverse impacts on the surrounding highway network or on transport related noise or air quality.
- 6.10.15 The submitted TA finds that the impact of the proposed development can be more than sufficiently accommodated on the existing public transport network.
- 6.10.16 Sustainable modes of travel are easily accessible to the Site, with the railway station and bus stops within two minutes walk, via routes benefiting from good quality footways. Designated cycleways are also provided in close vicinity to the Site.

## 6.11 Refuse and Servicing

- 6.11.1 Policy DMT1 requires proposals to adequately address delivery, servicing and drop off requirements, and Policy DMHB11 states that new development must provide adequate provision for storage of refuse and recycling.
- 6.11.2 The Proposed Development includes secure refuse and recycling storage with direct access from the street. Internal access to this storage is provided to residents in close proximity to the central stair and lift core.
- 6.11.3 Refuse collection will take place from Tavistock Road, in accordance with current procedures for refuse collection along Tavistock Road and the immediate area.
- 6.11.4 Deliveries and servicing for the building will make use of the existing highways arrangement which allows short stay parking.

## 6.12 Flood Risk and Drainage

- 6.12.1 The Site is 0.07ha in area and located within Flood Zone 1, and therefore does not meet the NPPF requirements under which a Flood Risk Assessment (FRA) should be carried out. However, a FRA has been conducted with a Surface Water Management Report and Water Cycle Strategy, which has been used to inform the design.
- 6.12.2 Policy DMEI10 of the Local Plan and paragraphs 164, 181 and 182 of the NPPF are relevant to drainage.
- 6.12.3 The submitted Flood Risk Assessment and Surface Water Management Report finds that the probability of flooding from all potential sources is low. Surface water run off from the development will be reduced from the pre-development volume and will not adversely affect flood risk areas within or near the site.



- 6.12.4 SuDS methods are incorporated into the Proposed Development in the form of green roofs, permeable paving and cellular attenuation, acting as pollutant control and therefore improving water quality from the pre-development site.
- 6.12.5 The combination of the low probability of flood risk, the incorporation of SuDS principles and appropriate management arrangements will ensure that the proposal complies with both the Development Plan and the NPPF.

### **6.13 Air Quality**

- 6.13.1 There are various policies at local, regional and national level governing air quality. These comprise Local Plan Policy EM8 and DME114, Policies GG3 and SI1 of the LP, and paragraphs 110 and 199 of the NPPF. DME114 requires development to be air quality neutral and to include sufficient mitigation to avoid unacceptable risk of air pollution and to actively contribute towards improving air quality.
- 6.13.2 An Air Quality Assessment is submitted as part of the Application, which surmises that mitigation measures will be required during the construction phase in order to minimise dust effects, and that the potential air quality impacts of the development once operational will be negligible, with all annual and short term mean concentrations below regulated thresholds. The overall air quality effects of the Proposed Development are assessed as being 'not significant', with the Proposed Development determined to be air quality neutral, and compliant with policies and regulations in place.

### **6.14 Ground Contamination**

- 6.14.1 Local Plan Policy DME112 supports the development of land which is affected by contamination provided it can be demonstrated that the issues have been assessed and the site can be safely remediated in order to be suitable for the intended use. The NPPF sets out that new development should be appropriate for its location taking into account the likely effects of pollution, and that a site should be suitable for its proposed use taking into account ground conditions and risks arising from contamination (paras. 196 and 198).
- 6.14.2 A Geoenvironmental Site Investigation Report Phase 1 Preliminary Risk Assessment was approved as part of the previous planning application for the Site (ref. 35810/APP/2021/1234, granted via appeal) which concluded that future end users of the site would be at low to moderate risk of being affected by contamination.
- 6.14.3 As part of the Application, it has been confirmed that the Proposed Development would not give rise to any difference in ground conditions to those previously reported and addressed. This confirmation statement is included as part of the submission.



## 6.15 Fire Safety

- 6.15.1 London Plan Policy D12 requires development to achieve the highest standards of fire safety, and to ensure that fire strategies identify suitably positioned outside space and design to incorporate appropriate features to reduce the risk to life and serious injury, providing suitable and appropriate means of escape. Development must have a robust strategy for evacuation and provide suitable access for firefighting.
- 6.15.2 A Fire Statement is submitted as part of this Application which confirms arrangements for safe evacuation and firefighting, including the provision of two evacuation lifts, an automatic fire detection system across all parts of the building, and also sets out the design features incorporated to reduce risks in the event of a fire, such as ventilated lobbies with smoke control systems, fire resistant doors, automatic suppression where required by legislation and fire resistant construction. It confirms that all units will have an appropriate means of warning and escape, as required by LP Policy D12, with ground floor units having direct access to outside space and units on floors above having access to common areas.
- 6.15.3 Adequate access is provided for emergency vehicles, with stairways designed to the minimum required standard for firefighting and appropriate signage provided.
- 6.15.4 Further details can be found within the submitted Fire Statement, which demonstrates that compliance with LP Policy 12 has been achieved.

## 6.16 Energy and Sustainability

- 6.16.1 The NPPF requires planning applications to consider the need to mitigate and adapt to climate change (para. 162 – 165), with one of the three overarching objectives including the need to mitigate and adapt to climate change, including moving to a low carbon economy (para. 8). LP Policy SI2 requires major development to be net zero carbon, which is to be achieved following an energy hierarchy of Be Lean: Be Clean: Be Green: Be Seen, and the GLA Energy Assessment Guidance requires a minimum 35% on site carbon reduction beyond Part L 2021, whilst at the local level, Local Plan Policies EM1 and DME12 seek to address climate change and the reduction of carbon emissions.
- 6.16.2 An Energy Statement has been prepared as part of the Application, which has applied the energy hierarchy as part of its assessment of the Proposed Development. The Site is not in an area that is accessible to a district heating network, neither is on site Combined Heat and Power (CHP) feasible. However, a number of passive and active design measures are identified, alongside renewable energy, to maximise energy efficiency and minimise CO2 emissions. As a result of these measures, the Energy Statement concludes that the Proposed Development meets an on site cumulative SO2 reduction of 63%, which is considerably in excess of that required by policy.



- 6.16.3 A number of measures are incorporated to ensure that the Proposed Development maximises its sustainability potential, which cover themes including effective resource management, adaptation to climate change and pollution management.
- 6.16.4 As such, the Proposed Development meets the sustainability targets of the Development Plan, including London Plan Policy SI2 and Local Plan Policy DMHB11.
- 6.16.5 Further information is available within the submitted Energy Statement and Overheating Assessment.

## 6.17 Ecology and Biodiversity

- 6.17.1 Local Plan Policy BE1 and LP Policy G5 require new development to enhance and protect biodiversity, and the NPPF states a national commitment to minimising impacts of development on biodiversity, halting the overall decline in biodiversity and providing net gains where possible.
- 6.17.2 The Site currently presents very low biodiversity, being comprised of a building and hardstanding with no soft landscaping. It has negligible ecological importance with no protected species or evidence of protected species.
- 6.17.3 Having an existing biodiversity value of 0, the scheme is subject to the de-minimis exemption in regard to Biodiversity Net Gain.
- 6.17.4 Nonetheless, in order to support future biodiversity, the landscaping proposals for the site include generous areas of soft landscaping, including herb gardens and fruit trees, wildflower planting and biodiverse green roofs.
- 6.17.5 An Ecological Appraisal is submitted as part of the Application which includes further details on ecological and biodiversity measures on the Site. The report confirms that there is no evidence of protected species on the Site, and negligible potential for protected species due to the absence of suitable habitat or suitable roosting features for bats. It concludes that no further surveys are necessary, with no foreseen impacts to ecology due to the lack of any habitats on the Site.
- 6.17.6 The Proposed Development will deliver an Urban Greening Factor of 0.4, through a combination of the proposed planting scheme, green walls, amenity grassland, green roofs and permeable paving, demonstrating full compliance with the requirements of LP Policy G5. The full calculation can be found in the submitted Landscape Design Strategy.



SECTION 7

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Community Infrastructure Levy &  
Planning Obligations



## 7.0 Community Infrastructure Levy & Planning Obligations

### 7.1 Community Infrastructure Levy (CIL)

7.1.1 CIL was adopted by LB Hillingdon in 2014. This is a charge on development to help towards the funding of infrastructure such as transport, schools, healthcare and other community facilities, required to help support and accommodate new growth which arises as a result of development.

7.1.2 CIL is payable by all new developments that add 100sqm or more of new floorspace. Existing floorspace which is to be replaced by new development can be offset from CIL charges, providing the space has been in continuous lawful use for at least six months in the three years prior to planning permission being sought.

7.1.3 The Proposed Development is CIL liable and will be required to contribute to infrastructure delivery in Hillingdon. The existing building was last occupied between June 2023 and July 2024 meaning that CIL is not payable on this floorspace (367sqm). The charge is index linked, and the rate for CIL during 2026 is set at £160.43 per sqm for residential development (Use Class C3).

7.1.4 The Proposed Development is also liable for Mayoral CIL 2 (MCIL 2), which contributes towards the funding of Crossrail. MCIL is set in bands, with LB Hillingdon falling within Band 2. The charge for 2026 is £72.73 per sqm.

### 7.2 Planning Obligations

7.2.1 The Proposed Development is likely to be subject to site specific planning obligations, to be secured via Section 106 legal agreement.

7.2.2 Planning obligations are only to be sought where the following tests are met (NPPF Para. 58):

- Necessary to make the development acceptable in planning terms;
- Directly related to the development, and
- Fairly and reasonably related in scale and kind to the development.

7.2.3 Heads of Terms may include matters such as the following:

- Transport Related: parking permit exclusion for all future residents, provision of car club space;
- Open Space Contribution;
- Employment Strategy and Construction Training; and
- Project Management and Monitoring Fee.



SECTION 8

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Planning Balance and Conclusion



## 8.0 Planning Balance and Conclusion

### 8.1 Planning Balance

8.1.1 This section of the Planning Statement provides an assessment of the planning balance having regard to the matters considered in Section 6 above.

8.1.2 The Planning Application Proposals have been assessed in the following manner:

- Do the proposals comply with the Development Plan?
- Do the proposals give rise to any harm?
- Are there material considerations which should be weighed in the balance?
- Do the benefits of the proposals outweigh any harm that has been identified?
- Considering the Development Plan and the NPPF as a whole, are there factors to bring about a different conclusion?

8.1.3 Section 6 of this Planning Statement assesses the Proposed Development against planning policy and concludes that the proposals comply with planning policy, including that where there are some deviations from what is strictly sought, this is justified by way of particular circumstances and/or viability, which is allowed for in policy.

8.1.4 No harm has been identified as a result of the Proposed Development.

8.1.5 The principle of residential use in Town Centres and sustainable locations is well established and supported by planning policy at local, regional and national levels. The site is a small brownfield parcel of land, under-utilised despite its allocation status.

8.1.6 Despite the constraints of the Site, the scheme delivers a number of benefits, including:

- Regeneration and effective use of a small, under-utilised, brownfield site;
- Contribution towards the vitality and viability of Yiewsley Town Centre;
- Delivery of 31 high quality new homes, helping to meet local housing need and London's housing crisis;
- Provision of family sized accommodation;
- Provision of excellent living conditions through good daylight levels, good noise environment and access to private and communal amenity space;
- Meeting or exceeding the nationally described space standards in all units;
- A sustainably designed building;
- Biodiversity enhancement and urban greening;



- Cleaning up of historic industrial land;
- Encouragement of sustainable travel through low car parking provision, provision of a car club space and measures through the Framework Travel Plan; and
- Financial contributions towards employment and training, nearby public open space, air quality mitigation and carbon offsetting (and other planning obligations to be agreed) as well as contributions towards community infrastructure.

8.1.7 Considering the Development Plan and the NPPF as a whole, there are no factors to bring about a different conclusion, and indeed they seek to support development such as that which is proposed.

## 8.2 Conclusion

8.2.1 This Planning Statement has been prepared in support of a detailed planning application for the redevelopment of the Site at Tavistock Works, Tavistock Road, West Drayton, UB7 7QX.

8.2.2 The Application seeks consent for the demolition of the existing building and replacement with a 6-storey building comprising 31 residential units, alongside landscaping and amenity space.

8.2.3 The Site is currently an under-utilised brownfield parcel of land comprising a part one storey part two storey building and adjacent areas of hardstanding.

8.2.4 The Site benefits from being part of an allocation for residential development within the Local Plan, with Policy SA38 including it alongside Padcroft Works and COMAG I for comprehensive redevelopment. It forms the final parcel within the allocation to be developed and will complete this comprehensive redevelopment aspiration.

8.2.5 Further support is lent to its redevelopment through regional and national planning policy, both of which encourage under-utilised brownfield land to be regenerated to make optimal and efficient use of such sites.

8.2.6 The Site is in a highly accessible and sustainable location, and the Proposed Development provides a harmonious built form when considered in conjunction with the adjacent Padcroft Works and COMAG I sites, delivering much needed residential accommodation of a high quality design.

8.2.7 This Statement has assessed the material considerations arising from the Proposed Development against the prevailing planning policy framework and has demonstrated that the scheme complies with the Development Plan, when read as a whole. Furthermore, the Lapsed Permission represents a material planning consideration and the Proposed Development has been designed to fit within the envelope of that Lapsed Permission. This should be afforded substantial weight when considering the latest proposals for the Site, given the Development Plan remains consistent with that in place for the Lapsed Permission and the Proposed



Development does not give rise to any new impacts, as demonstrated by the Planning Assessment at Section 6 of this report and the submitted supporting documents.

8.2.8 The Proposed Development provides many significant planning merits, and should therefore be recommended for approval.



## Appendix A – List of Relevant Planning Policy

## Appendix A – List of Relevant Planning Policy

<b>Policy</b>	<b>Description</b>
<b>The London Plan – The Spatial Development Strategy for Greater London (March 2021)</b>	
<b>GG1</b>	Building Strong and Inclusive Communities
<b>GG2</b>	Making the Best Use of Land
<b>GG4</b>	Delivering the Home Londoners Need
<b>Policy SD1</b>	Opportunity Areas
<b>Policy D1A</b>	Infrastructure Requirements for Sustainability Densities
<b>Policy D1B</b>	Optimising Site Capacity through the design-led approach
<b>Policy D2</b>	Delivering Good Design
<b>Policy D3</b>	Inclusive Design
<b>Policy D4</b>	Housing Quality and Standards
<b>Policy D5</b>	Accessible Housing
<b>Policy D6</b>	Housing Quality and Standards
<b>Policy D7</b>	Accessible Housing
<b>Policy D11</b>	Safety, Security and Resilience to Emergency
<b>Policy D12</b>	Fire Safety
<b>Policy D14</b>	Noise
<b>Policy H1</b>	Increasing Housing Supply
<b>Policy H2</b>	Small Sites
<b>Policy H5</b>	Delivering Affordable Housing
<b>Policy H7</b>	Affordable Housing Tenure
<b>Policy H10</b>	Housing Size Mix
<b>Policy S4</b>	Play and Informal Recreation
<b>Policy G5</b>	Urban Greening
<b>Policy G6</b>	Biodiversity and Access to Nature
<b>Policy SI1</b>	Improving Air Quality
<b>Policy SI3</b>	Energy Infrastructure
<b>Policy SI5</b>	Water Infrastructure
<b>Policy T4</b>	Assessing and Mitigating Transport Impacts
<b>Policy T5</b>	Cycling
<b>Policy T6.1</b>	Residential Parking



<b>The Hillingdon Local Plan Part 1: Strategic Policies</b>	
<b>Policy NPPF1</b>	NPPF – Presumption in Favour of Sustainable Development
<b>E3</b>	Strategy for Heathrow Opportunity Area
<b>H1</b>	Housing Growth
<b>BE1</b>	Built Environment
<b>EM1</b>	Climate Change Adaptation and Migration
<b>EM4</b>	Open Space and Informal Recreation
<b>EM7</b>	Biodiversity and Geological Conservation
<b>EM8</b>	Land, Water, Air and Noise
<b>T1</b>	Accessible Local Destinations
<b>The Hillingdon Local Plan Part 2: Development Management Policies</b>	
<b>DMH2</b>	Housing Mix
<b>DMHB11</b>	Design of New Developments
<b>DMHB12</b>	Streets and Public Realm
<b>DMHB14</b>	Trees & Landscaping
<b>DMHB15</b>	Planning for Safer Places
<b>DMHB16</b>	Housing Standards
<b>DMHB17</b>	Residential Density
<b>DMH18</b>	Private Outdoor Amenity Space
<b>DMHB19</b>	Play Space
<b>DME11</b>	Living Walls and Roofs
<b>DME12</b>	Reducing Carbon Emissions
<b>DME17</b>	Biodiversity Protection and Enhancement
<b>DME112</b>	Development of Land Affected by Contamination
<b>DME114</b>	Air Quality
<b>DMT1</b>	Managing Transport Impacts
<b>DMT2</b>	Highways Impacts
<b>DMT5</b>	Pedestrians and cyclists
<b>DMT6</b>	Vehicle Parking
<b>DMCI5</b>	Children’s Play. Areas
<b>The Hillingdon Local Plan Part 2: Site Allocations &amp; Designations</b>	
<b>Policy SA38</b>	Padcroft Works & COMAG