

PLANNING STATEMENT

In Respect Of:

FULL PLANNING APPLICATION

With Regard To:

**266 – 278 Yeading Lane
London
UB4 9AX**

On Behalf Of:

OG Holdings Ltd

CREATE Red: IG/ 306

Date: 13-01-2025

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1.0 INTRODUCTION

This Planning Statement (“Statement”) has been prepared by CREATE Planning (“Agent”), submitted on behalf of **OG Holdings Ltd** (“Applicant”), in support of a Full Planning Application (“Application”), with regard to a change of use scheme at 266 - 278 Yeading Lane, Hayes UB4 9AX.

CREATE provides architectural, town planning and urban design consultancy advice to corporate and commercial clients as well as to house builders, and private individuals on a wide range of development throughout the United Kingdom. CREATE is a leader in the built environment; an innovative multidisciplinary practice creating outstanding people centric and exemplary schemes.

This statement sets out the development proposal in Section 2, identifies the site and surrounding area at Section 3, and outlines the relevant planning history in Section 4. The relevant planning policy is set out in Section 5 and the statement assesses the proposed development in accordance with those policies at Section 6. Our planning considerations are set out in Section 7 and conclusion in Section 8.

The proposed application outlines the redevelopment of an existing two-storey terraced building in East Yeading. Currently, the site comprises ground-floor retail units and first-floor residential dwellings that do not meet the London Plan (2021) standards. The redevelopment will involve converting the existing residential units into four 2-bedroom dwellings and one 1-bedroom M4(3) accessible units as well as nine new additional residential units by constructing a second floor which includes four 3-bedroom duplex units and four 2-bedroom units. Five of the ground-floor retail units will remain intact to ensure their continued operation and service to the community. However, one retail unit will be lost to allow the provision of a residential lobby and area for building services. In addition, the project will incorporate parking spaces with a strong emphasis on accessibility, in alignment with policy requirements. This redevelopment aims to enhance the functionality and value of the site.

Information about the Building

The site at 266-278 Yeading Lane, UB4 9AX, is a two-storey terraced building with ground-floor retail units and first-floor residential dwellings. It features a flat roof, brick facade, and is located on brownfield land in East Yeading within the London Borough of Hillingdon. The building is positioned along a busy thoroughfare and benefits from proximity to various community amenities.

2.0 PROPOSED DEVELOPMENT

The proposal aims to redevelop the site by introducing 14 new residential units (C3 use class). The plan includes partial demolition works to the existing five 3-bedroom units on the first floor to convert them into four 2-bedroom apartments and one 1-bedroom M4(3) accessible apartment to meet London Plan standards. To offset the loss of 3-bedroom family homes, the first floor is extended to create four new 3-bedroom duplexes, each with an upper floor (new second floor) dedicated to bedrooms. A new second floor is proposed that accommodates at the upper floors of the duplex units and a further five 2-bedroom apartments. The proposal involves 14 new residential units. All residential units are improved to be a minimum of M4(2) compliant and in accordance with Nationally Described Space Standards (NDSS). A viability report has been undertaken as part of this application and confirms that the project is unviable to provide an affordable housing contribution.

- **Loss of Retail:** The loss of a single retail commercial unit for the provision of a residential lobby and service core.
- **Conversion:** Partial demolition and construction works to convert five existing 3-bedroom units into four compliant 2-bedroom units and one 1-bedroom M4(3) accessible apartment.
- **New Units:** Construction of 9 new residential units via constructing an additional floor and a double-loaded corridor, bringing the total number of units to 14 residential flats.

To enhance accessibility and promote sustainable transportation, two accessible parking spaces are proposed along with dedicated cycle parking facilities will be installed towards the west side of the building.

On the ground floor, the existing retail units are largely retained with a single retail unit to be lost. These 5 retained retail units ensure that these vital community services remain operational and unaffected. The central vacant retail unit is transformed into a vertical circulation core. This space is redesigned into a residential lobby, which will provide access to a new central core featuring both lift and staircase, facilitating easy movement between floors for residents. Opposite the residential lobby, a new service area will be established. This area will include:

- **Refuse Storage:** A designated space for waste disposal to ensure proper and convenient waste management.
- **Plant Room:** A room for essential building services and maintenance needs, supporting the operational functionality of the building.

The table on the following page summarises the development proposal by floors with the associated areas (m²):

Table 1		
Proposed Areas	Areas Per Units	Total Area (inc. Circulation Space areas, etc.)
Ground Floor <i>(Existing Commercial Units)</i>	Commercial Unit 01: (GIA 80.5m ²) Commercial Unit 02: (GIA 123.7m ²) Commercial Unit 03: (GIA 182.8m ²) Commercial Unit 04: (GIA 315.8m ²)	702.8m ²
First Floor <i>(Proposed Residential)</i>	Unit 01 (a): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 02 (a): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 03 (a): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 04 (a): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 05: 2-bedroom apartment M4(2) (GIA 65.4 m ²) Unit 06: 2-bedroom apartment M4(2) (GIA 65.9 m ²) Unit 07: 2-bedroom apartment M4(2) (GIA 65.8 m ²) Unit 08: 1-bedroom apartment M3(b) (GIA 66.2 m ²) Unit 09: 2-bedroom apartment M4(2) (GIA 65.3 m ²)	717 m ²
Second Floor <i>(Proposed Residential)</i>	Unit 01 (b): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 02 (b): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 03 (b): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 04 (b): 3-bedroom apartment M4(2) - Duplex (GIA 48.8 m ²) Unit 10: 2-bedroom apartment M4(2) (GIA 65.4 m ²) Unit 11: 2-bedroom apartment M4(2) (GIA 65.9 m ²) Unit 12: 2-bedroom apartment M4(2) (GIA 65.8 m ²) Unit 13: 2-bedroom apartment M4(2) (GIA 66.2 m ²) Unit 14: 2-bedroom apartment M4(2) (GIA 65.3 m ²)	625 m ²
Third Floor <i>(Proposed Roof)</i>		

This development is designed to enhance site usability, ensure compliance with the London Plan (2021), and meet both community needs and regulatory standards. The opening and closing hours of these retail units will not be affected, ensuring the retention of these shops and their continued service to the community.

Existing Use

The existing use of the site includes six retail units on the ground floor and five three-bedroom residential dwellings on the first floor.

Proposed Development Description

The application is to convert one central retail unit (Class E) into a lobby area and for the conversion of the existing five 3-bedroom residential units (C3 Use Class) into four 2-bedroom residential dwellings and one 1-bedroom M4(3) dwelling, and nine additional residential dwellings across the first and second floors as well associated landscaping.

3.0 DESCRIPTION OF THE SITE

General Description

266-278 Yeading Lane, UB4 9AX, is located in a highly sustainable location in East Yeading within the London Borough of Hillingdon. The site consists of a two-storey terraced building featuring six retail units on the ground floor and five three-bedroom residential dwellings on the first floor. The building features a rectangular composition with a flat roofscape and a brick facade. In contrast, the existing parade of shops to the south predominantly has pitched roofs with occasional gable ends facing the street.



Above: Satellite Image of Application Site (Aerial View), **Source:** Google Earth

Situated on brownfield land, the site is diagonally oriented with its front facing Yeading Lane, a busy vehicular thoroughfare with an access road running parallel and adjacent to the site. The main carriageway of Yeading Lane is separated from the feeder road by a grassy traffic island that includes several mature trees. The rear of the property serves as a service road or yard for the retail units on Yeading Lane, accessible from Willow Tree Lane. Adjacent to the eastern side of the service yard are semi-detached residential units, with their gardens facing the rear of the property.

Local Context & Amenities

The local context of the area has a range of amenities and social infrastructure. There are numerous shops and amenities in the immediate proximity, and within 800m of the site on Yeading Lane. These include the following.

- Food shops;
- Health shops;
- Convenience stores;
- Restaurants;
- Clothes store;
- Launderette;
- Post office;
- Veterinary centre;
- Pharmacy;
- Gambling establishments;
- Beauty salon;
- Solicitors;

- Post office;
- Newsagent;
- Etc.

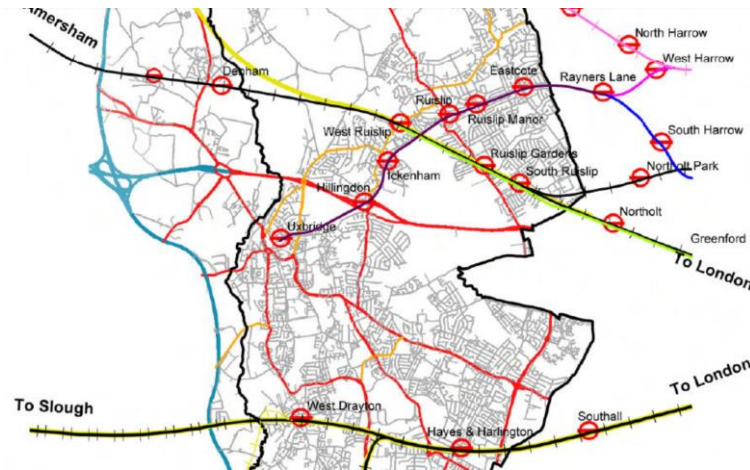
The site is also a short walk from both Barnhill Community School, and Belmore Primary School.

Transport Networks

The main vehicular and pedestrian access to the site is via Yeading Lane, which is reasonably well-served by Transport for London (TFL) buses operating on Yeading Lane and Willow Tree Lane. There are no rail or tube stations within a 10-minute walking distance.



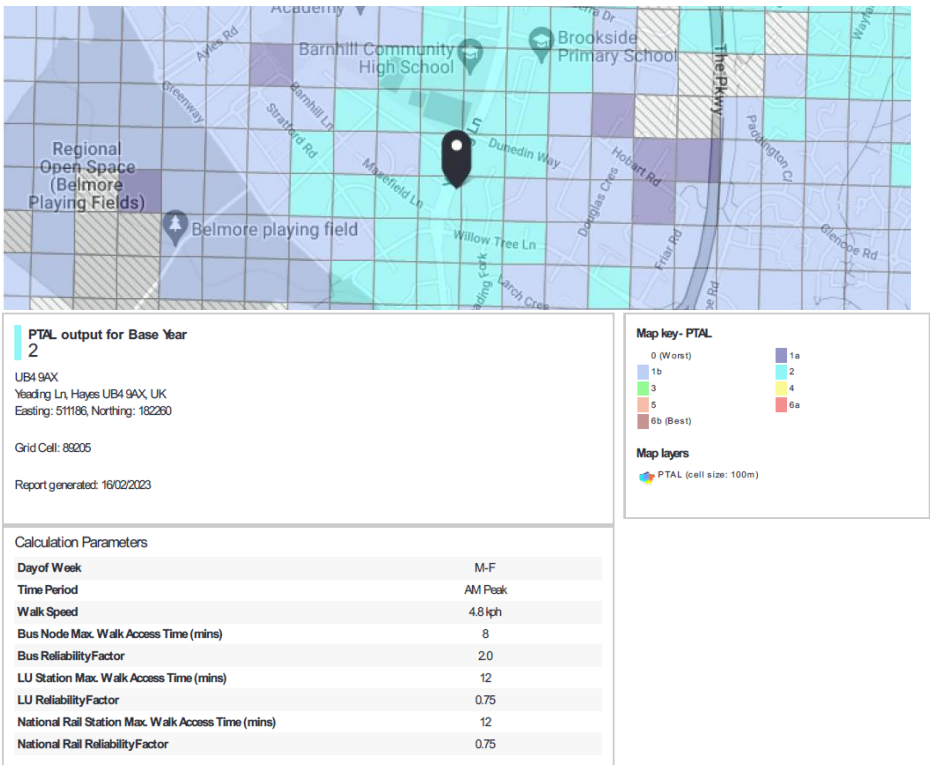
Above: Public Transport (Bus Stops) near the Application Site **Source:** Google Maps



Above: Hillingdon Transport Infrastructure Plan, **Source:** Draft Local Implementation Plan: 2011 – 2014: Improving Transport In Hillingdon

According to the Transport for London WebCAT service, the application site has a Public Transport Accessibility Level (PTAL) rating of 2, indicating limited access to public transport compared to London as a whole. However, the development is situated within a local shopping

centre, offering convenient walking and cycling access to a range of shops, services, and facilities, including a pharmacy, green grocers, newsagent, and post office.



Above: PTAL Rating – Output for base year = 2, **Source:** Transport for London

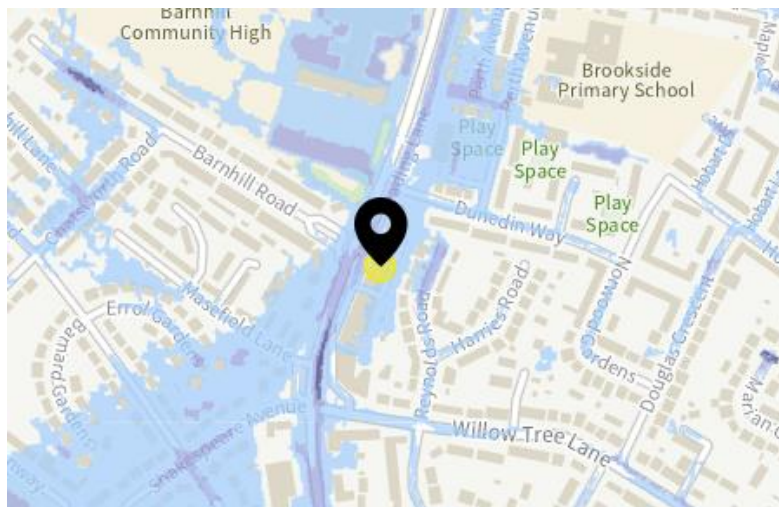
Flood Risk



Above: The flood maps indicate that the site is largely in Flood Zone 1 with a small part of the site to the south within Flood Zone 2.

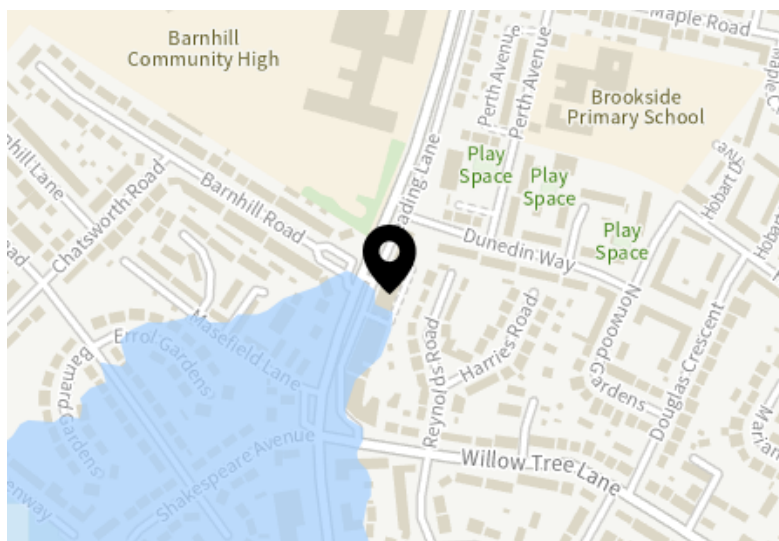
Flood Zone 1, signifies areas with the lowest probability of flooding. This zone is classified as having less than a 0.1% annual probability of river or sea flooding, equating to less than 1 in 1000 chance.

Flood Zone 2, signifies areas with a medium probability of flooding. This zone is classified as having between 0.1% – 1% annual probability of river flooding, equating to between a 1 in 100 and 1 in 1,000 annual probability of river flooding.



Above: The flood maps indicate that Surface Water Flooding.

Surface water flooding in this region is at Low risk meaning that this area has a chance of flooding of between 0.1% and 1% each year.



Above: The flood maps indicate flooding from River and Sea.

Flooding from river and sea in this region are very low risk means that this area has a chance of flooding of less than 0.1% each year.

Vulnerability Classification

The vulnerability classification of the proposed development is considered to be 'more vulnerable' In accordance with Annex 3: Flood risk vulnerability classification in the NPPF. Developments with a classification of 'more vulnerable' development is considered appropriate within Flood Zones 1 and 2 according to Table 2 of the National Planning Policy Guidance (NPPG).

4.0 PLANNING HISTORY

A planning history search using the London Borough of Hillingdon Council’s website reveals that there are no planning applications relating to the application site. However, a Pre-Application Advice request was undertaken earlier this year which proposed to replace the first-floor residential building with two floor extension. For various reasons the proposal was not pursued and consequently a planning application was not submitted to the Council.

Table 2		
Application Ref	Application Description	Decision
3723/PRC/2023/40 Pre-App Advice	Demolition of existing first floor residential with 2 storey extension.	Advice Received (29/01/2024)

Pre-application Summary

The pre-application advice from Hillingdon Council was generally supportive of the proposed development and accepted a range of key principles and characteristics which have been set out as follows.

- **Loss of Retail Unit:** The loss of a retail unit could be accepted providing clear justification is provided.
- **Residential Floor Area:** The increase of residential floor area was considered to be acceptable.
- **Height and Scale:** Increasing the height of the proposed development to three storeys was accepted in principle subject to residential amenity of the residential properties located to the rear being respected.
- **Building Appearance:** A mostly pitched roofscape for the proposed development was considered to be appropriate as it would be in keeping with the existing buildings of quality to the south.
- **Identifiable Retail:** The retail base of the building was considered to be a benefit as it would provide a stronger ground level delineation between the retail units and flats above. This would also allow shop frontage with fascia for advertising and signage for the shops.
- **Amenity Space:** The amenity space provisions are likely to be acceptable, when considering the existing and constrained nature of the site.

Notwithstanding the above, the pre-application advice identified several key planning issues which have been listed below:

- **Loss of Family-Sized Homes:** Concerns regarding the removal of five family-sized homes without providing adequate replacement units (three bedrooms or more), indicating the need to revise the unit mix.
- **Design Compatibility:** The design of the development was noted to potentially conflict with the local character, requiring adjustments to ensure alignment with the existing architectural context.
- **Privacy Impacts:** Potential issues related to the impact on privacy for neighboring amenities need to be addressed.
- **Parking Provision:** The current parking plan was found to be insufficient, necessitating further consideration of parking needs.

- **Open Space Contribution:** A requirement for a contribution towards local open space was highlighted.
- **Retail Unit Justification:** The rationale for the loss of a retail unit was deemed inadequate and not fully compliant with relevant policies.
- **Impact Assessments:** The development must address impacts related to air quality, fire safety, energy efficiency, and flooding to ensure compliance with regulatory standards.
- **Frontages:** The frontage window and balcony arrangement need to be well considered to reflect the rhythm of the windows of the parade of shops to the south.

All of the pre-application advice has been carefully reviewed, considered, and implemented where possible.

5.0 Community Involvement

As part of this planning application 25 local residents were consulted and made aware of the planning application. For further information, please refer to the *Statement of Community Involvement* which has been prepared by *CREATE Planning* to accompany the application.

6.0 PLANNING POLICY FRAMEWORK

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plans for the London Borough of Hillingdon include:

- The Local Plan: Part 1 – Strategic Policies (2012)
- The Local Plan: Part 2 – Development Management Policies (2020)
- The Local Plan: Part 2 – Site Allocation and Designation (2020)

The Mayor of London published *The London Plan* (adopted March 2021) which is a revised version of the document that was previously published, to replace its predecessor. The Plan is part of the statutory development plan for Greater London. The London Plan also presents the planning policies for the region including how they are expected to be applied. The planning policies in The London Plan need to be met and should inform decisions on planning applications.

The Ministry of Housing and Communities Local Government (now the Department for Levelling Up, Housing & Communities) published the revised *National Planning Policy Framework* (NPPF) in December 2023. which sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is supported by the National Planning Practice Guidance (NPPG) which provides more detail to the policies of the NPPF. The NPPF and NPPG are material considerations in the determination of planning applications and appeals.

The relevant Supplementary Planning Documents (SPDs) and Guidance, like *The West London Waste Plan (2015)* is also material considerations in determination of planning applications and appeals.

Summary of Policies

NPPF

- Chapter 02 - Achieving sustainable development
- Chapter 04 - Decision-Making
- Chapter 05 - Delivering a sufficient supply of homes
- Chapter 09 - Promoting sustainable transport
- Chapter 11 - Making effective use of land
- Chapter 12 - Achieving well-designed places
- Chapter 14 - Meeting the challenge of climate change flooding

London Plan

- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy GG2 Making the best use of land
- Policy GG3 Creating a healthy city

- Policy GG4 Delivering the homes Londoners needs
- Policy H1 Increasing housing supply
- Policy H10 Housing size mix
- Policy S4 Play and informal recreation
- Policy G5 Urban greening
- Policy SI12 Flood risk management
- Policy SI4 Managing heat risk
- Policy T1 Strategic approach to transport
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.1 Residential parking

The Local Plan: Part 1 – Strategic Policies (2012)

- SO2 High Quality Sustainable Design
- SO4 Reduction in Crime and Disorder
- SO7: Address Housing Needs
- SO8: Protect and Enhance Biodiversity
- SO10: Improve and Protect Air and Water Quality
- SO11: Address the Impacts of Climate Change
- SO12: Reduce the Reliance on the Use of the Car
- SO13: Sustainable Waste Management
- SO17: Link Deprived Areas with Employment Benefits
- SO19: Meet the London Plan target of 425 new homes per annum
- BE1 Built Environment
- EM1 Climate Change Adaptation and Mitigation
- EM6 Flood Risk Management
- EM8 Land, Water, Air and Noise
- EM7 Biodiversity and Geological Conservation
- EM11 Sustainable Waste Management
- H1 Housing Growth

Other Policies

- DMEI 2 Reducing Carbon Emissions
- DMEI 3 – Decentralised Energy
- DMEI 7 Biodiversity Protection and Enhancement
- DMEI 9 Management of Flood Risk
- DMEI 14 Air Quality
- DMH 2 Housing Mix
- DMHB 11 Design of New Development
- DMHB 14 Trees and Landscaping
- DMHB 16 Housing Standards
- DMHB 17 Residential Density
- DMHB 18 Private Outdoor Amenity Space
- DMT 1 Managing Transport Impacts
- DMT 2 Highways Impacts
- DMT 6 Vehicle Parking
- LPP D1 (2021) London's form, character and capacity for growth

- LPP D12 (2021) Fire safety
- LPP D13 (2021) Agent of change
- LPP D14 (2021) Noise
- LPP D3 (2021) Optimising site capacity through the design-led approach

7.0 PLANNING CONSIDERATION

The NPPF makes clear from the outset that the purpose of the planning system is to contribute to the achievement of sustainable development. Furthermore, that this ‘includes the provision of homes, commercial development, and supporting infrastructure in a sustainable manner’ (Para. 7, NPPF). As a proposal for a mixed-use development for 14 new (C3 use class) residential units, with existing commercial units, and associated landscaping it is a clear example of this purpose. A full suite of drawings and a design and access statement have been submitted as part of this application which outline the proposals in more detail.

The overarching approach in the Local Plan: Part 1 is NPPF1 which mirrors the presumption in favour of sustainable development contained within the NPPF. Importantly, Policy NPPF1 (Local Plan: Part 1) confirms that where planning applications accord with the policies in the Local Plan they will be approved without delay, unless material considerations indicate otherwise. Furthermore, Para. 11 indicates, at the heart of the NPPF that sustainable development should be pursued in a positive way, with a presumption in favour of sustainable development. For decision taking this means:

(c) approving development proposals that accord with an up-to-date development plan without delay.

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless (our emphasis):

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

In accordance with Paragraph 11(d), it is considered that the local plan is out of date for the purposes of determining planning applications for housing development and that there is an absence of the operation of either of the exceptions provided in Paragraph 11(d). Therefore, the presumption in favour of development is engaged in this instance. This statement sets out the justification for this position in the following sections.

The main planning considerations for the determination of this application relate to the principle of development, meeting housing need in the London Borough of Hillingdon, Housing Density, Housing Mix, Landscape, Neighbouring Amenity, Noise, and Design and Appearance Highway Safety.

The following sections establish the acceptability of the principle of the proposed development and sets out how the proposal satisfies the relevant policies of the adopted development plan.

Principle of Development

The main policy considerations relating to the principle of development are set out in both the NPPF and the Local Plan (2012) and the London Plan (2021).

As set out in the NPPF (revised in December 2023), it is a stated aim of Government Policy to deliver a sufficient supply of homes (Chapter 5). In this respect, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay (Paragraph 60). In addition, Paragraph 63 states that size, type, and tenure of housing needed for different groups should be assessed.

In addition, that previously developed or 'brownfield land' should be used as effectively as possible in terms of meeting the needs for housing (Paragraph 123). Moreover, that decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where available sites could be used more effectively. Specific reference is given to mixed-use schemes (Paragraph 124a) such as the application site. In addition to the above, in areas where there is a shortage of land for meeting identified need, it is especially important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site (Paragraph 128). Significant emphasis is given to this as it states that 'Local Planning Authorities should refuse applications that fail to make efficient use of land, taking into account the policies within the NPPF' (Paragraph 129c).

At a local level it is a stated The Vision for Hillingdon 2026 for 'Improved accessibility to local jobs, housing and facilities is improving the quality of life of residents' (Local Plan: Part 1, p. 21). The objective to supply homes and land that addresses local, and London housing needs is further reinforced in the Strategic Objectives (SO7 and SO19).

Policy H1 (Housing Growth) makes clear that the Council will meet and exceed its minimum strategic dwelling requirement. The 'Implementation of Policy H1' is specifically articulated within the Local Plan. It promotes the design and density of new homes to reflect the specific and different land use characteristics in the north and south of the borough and places an emphasis to ensure that development makes the most efficient use of brownfield land. Furthermore, it states the need to promote high quality mixed-use developments.

Policy EM1 (Climate Change Adaptation and Mitigation) sets out the criteria for addressing climate change by prioritising higher density development in urban and town centres that are well served by sustainable forms of transport. Furthermore, it gives preference to developments on previously developed land to avoid the loss of further green areas. Thus, reiterating the sentiment of Paragraph 129 by encouraging the optimal use and potential of each site on the basis that the requirements of Paragraph 128 are met. These are listed as the following:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

- e) the importance of securing well-designed and beautiful, attractive and healthy places.

The proposed development seeks to make an efficient use of land at 266-278 Yeading Lane which is a local parade. As a brownfield site it seeks to optimise and make efficient use of the use of the land for housing. Moreover, while the proposal seeks to safeguard and improve the environment in accordance with the NPPF, Strategic Objectives (SO2; SO7; and SO19), and Planning Policy (H1 and EM1) of the adopted Local Plan. The site is located in a highly sustainable location with good access to local services on the proposed ground floor of the application site and along Yeading Lane. The site has excellent connectivity to bus services with the nearest bus stop within 100m with a PTAL rating of 2. Thus, the proposal successfully meets all the national and local policy requirements that encourages the type and quantum of development that is being put forward. Furthermore, the application meets all the necessary hallmarks that establish the principle for an increase in residential development.

Policy DMTC3 sets out the Councils desire for maintaining the viability of local centres and local parades. The policy seeks to protect and enhance the function of 'local shopping parades by retaining uses that support their continued viability and attractiveness to the locality they serve. Whilst the proposal involves the loss of a single retail unit on a block of 5 existing units the unit has been vacant for some time. Moreover, the development seeks to significantly improve viability of the site by increasing the housing density which use the local shops as well as significantly improve the attractiveness of the area. In doing so it is believed that the new development will attract more people to the parade and increase the footfall of the individual shops. Thus, safeguarding the future of the retail units. Furthermore, the policy clearly states that the Council seek to retain at least 50% of shopping parades as Use Class A1 (referred to as Use Class E from 2020). It is our understanding that the proposal for the reduction of a single retail unit does not bring this policy into jeopardy as the shopping parade is over this requirement due to being largely unchanged since it was built. Furthermore, it is evident that the surrounding residential area is not deficient in essential shop uses. Thus, the proposal is fully compliant with all aspects of the aforementioned policy.

In the rare instance that the Council do not agree with the stated position of Policy DMTC3, it is considered that the merits of the scheme which improves both the existing residential units to meet The London Plan standards, as well as improvements to the street scene, and subsequently to the wider area outweigh the loss of the single retail unit. Therefore, we are of the profound view that the proposal can be positively supported by the Council.

Affordable Housing & Viability

The proposal involves the partial demolition of the existing five 3-bedroom units on the first floor to convert the units into four 2-bedroom residential dwellings and one 1-bedroom M4(3) accessible apartment to meet London Plan standards. In addition, the proposal involves the nine additional residential units across both the first and second floors made up of four 3-bedroom units and five 2-bedroom units. Thus, totalling fourteen (C3) residential units. As set out in Policy H2 and DMH7 of the Local Plan this is over the threshold for affordable housing provision. However, a viability report has been undertaken by *Andrew Golland Associates* as part of this application and confirms that the project is unviable to provide an affordable housing contribution.

Housing Mix

The proposed housing mix below and in Table 1 is in accordance with both Policy H10 and Policy DMH2 of the Local Plan.

- 9x 2-bedroom apartment(s);
- 1x 1-bedroom M4(3) accessible apartment;
- 4x 3-bedroom (duplex).

It is considered that the mix of housing units and sizes reflects the Council's latest information on housing need and therefore is acceptable.

Flood Risk

A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by *Lucion Delta-Simons* to support the planning application. This assessment considers flood risk potential from all sources and provides options for managing any Site-specific flood risks that are identified in relation to the proposed residential dwellings at the Site.

As previously identified in Chapter 3 of this report, the site has the following characteristics:

- The site is largely in Flood Zone 1 with a small part of the site to the south within Flood Zone 2;
- Surface water flooding in this region is at Low risk meaning that this area has a chance of flooding of between 0.1% and 1% each year;
- Flooding from river and sea in this region are very low risk means that this area has a chance of flooding of less than 0.1% each year;
- The vulnerability classification of the proposed development is considered to be 'more vulnerable' In accordance with Annex 3: Flood risk vulnerability classification in the NPPF.

A summary of the FRA has been provided below, starting with the principle of the development in relation to flood risk, followed by the assessed risk from flooding, and a summary of the Drainage Strategy.

Developments with a classification of 'more vulnerable' development is considered appropriate within Flood Zones 1 and 2 according to Table 2 of the National Planning Policy Guidance (NPPG). Therefore, the principle of residential development occurring is considered acceptable according to both planning policy and planning policy guidance.

The FRA cites that the location of the site is significantly above sea level which in turn means that the risk from tidal flooding is 'negligible'. The proposed development is shown to be outside of the modelled 1 in 100 year + 30% Climate Change (CC) flood extent, accounting for defences in the Yeading Brook catchment. This is greater than the design event of 1 in 100 year + 17% CC, according to the latest EA guidance. As a result, the Site is considered to be at a 'very low' to 'low risk of flooding from rivers. Moreover, safe access and egress is achievable during all modelled flood scenarios.

The risk from surface water flooding has been reviewed and ranges from a 'very low' to 'medium' risk with the variation depending on the area of the site. All risk scenarios have been assessed

and concludes that the proposal can be deemed acceptable as all risks have been mitigated by the proposed layout. For the reasons that the most vulnerable area of the proposal is the residential flats which have been located on both the first and second floor levels. Therefore, removed from any risk of 'ponding'. Based on publicly available data and sources set out in the FRA the Site has a confidence score of 3 which is considered suitable for town to street scale development.

The NPPF guidance requires that all sources of flood risk pass the Sequential Test depending on the level of risk. As the risk has been assessed in detail with results that show both a 'very low' to 'low' level of risk a conclusion is made that the proposal passes the NPPF requirement. Furthermore, the site-specific circumstances (majority of the site in Flood Zone 1 with all more vulnerable development on the 1st and 2nd storeys) make the site a sequentially preferable site for development.

The Drainage Strategy identifies that the proposed development will not result in an increase in hardstanding on Site, as the existing Site is already 100% hardstanding. However, it indicates that attenuation is required on Site to accommodate runoff from the external ground level redeveloped areas. This strategy will ensure that the development will not increase surface water runoff and flood risk. At the stage of undertaking detailed drainage design, the attenuation volumes included in the FRA will need to be verified. A CCTV survey to confirm the invert levels of the nearby surface water sewer and foul sewer will also be needed.

Further mitigation to reduce surface water has been undertaken and incorporated in the design proposal through green infrastructure, and urban greening through the roof top landscaped areas. It is considered that this will further future proof the site from flood risk and provide a reduction in surface flooding compared to the existing site.

To conclude, the nature of the proposed development (predominantly comprising of a reconfiguration of the existing dwellings with an upward extension for an increased number of units) coupled with both the proposed design, and Site circumstances (geographical and data modelling) are compliant with the NPPF and PPG. Due to the above points that have been described the proposal is compliant with Policy G1, Policy G5, Policy SI12, and Policy SI13 of The London Plan and Policy EM1 and Policy EM6 of the Local Plan. For further detail please refer to the *Flood Risk Assessment* accompanied with this application.

Landscape & Urban Greening

The Landscape Proposal has been undertaken by *Create Design Ltd* and can be found in both the *Proposed Landscaping Plan* and Chapter 5.0 of the *Design & Access Statement*. The strategy which has been put forward seeks to address two key areas which are as follows the yard (rear of the site), and the terrace and roof space through both hardscape and soft scape.

The proposal seeks to significantly improve the visual appearance at the rear of the site through introducing new boundary treatments (where it is necessary) and a new coloured porous tarmac along in place of the existing hard surface. This new hard scape will seamlessly integrate the service areas at the rear of the site with key areas, such as the disabled carparking spaces, access to the cycle storage, plant, and refuse collection areas.

The 1st floor roof garden has been carefully designed to be used as a high-quality children's play area. A resin bonded rubber flooring has been proposed due to it being highly durable and slip resistant. A seating area has been proposed with weathered composite timber decking with Corten steel planters for the plants and trees. A 1.5m high opaque glazed perimeter has been proposed to avoid any privacy issues to neighbouring properties and for child safety. This play space area equates to a total of 62.1m². This area is above the 60m² requirement based on the GLA population yield calculator which is compliant with Policy S4 (Play and informal recreation) Part B of The London Plan.

The GLA population yield calculator requires 60m² of play space for all age groups based on 14 market units comprising of 1x one beds, and 9 x two beds, and 4 x three beds. At present we are providing 62.1m² of play space.

The 2nd floor roof garden offers a high-quality area for the residents' enjoyment which is accessed through the central core. A series of shrubs and planters have been provided with seating areas on a composite timber deck to create a positive tranquil environment. To provide privacy to the dwellings below, shrubs and planters have been carefully placed to shroud the rooflights. In recognising further privacy issues, in particular to the dwellings at the rear of the site, the proposal features a 1.5m tall opaque glass perimeter to the rooftop area.

An *Urban Greening Factor Report* has been prepared by *Lucion Delta Simons Ltd*. The UGF evaluates and quantifies the amount and quality of green space at a Site and is primarily used for new build designs to achieve a minimum target, depending on the type of development. As indicated the Site has an Urban Greening Factor of 0.1 which is below the recommended amount for commercial developments and 0.4 that is recommended for residential developments.

As outlined in The London Plan (2021) Policy G5B Urban Greening the local circumstances and the premise of the proposal needs to be taken into account. The proposal seeks to utilise the existing development footprint and has achieved the proposed urban greening factor through use of a rooftop garden. Considering the limitations the proposal that has been put forward accommodates a large amount of urban greening and provides significant improvements to the existing development. Therefore, it is in our view that the proposal put forward has the characteristics to be compliant with policy. For further detail please refer to the Urban Greening Factor Report accompanied with this application.

The specific plant species have been carefully selected based on both their capability thrive on a unique site in combination with their ability support wildlife. Please refer to Section 5.4 of the *Design and Access Statement*. These plant species help achieve on site Biodiversity Net Gain (BNG) and address the climate emergency. All plants and trees have been selected on the right plant right place principle to ensure that the scheme is robust and has longevity.

To conclude, it is considered that the proposal is compliant with Policy G4 of The London Plan and Policy DMHB14, Policy EM4, and Policy DMCI 4 of the Local Plan.

Biodiversity

The proposed landscaping scheme and proposed management scheme prepared by *Create Design Ltd* has been developed in order to maximise the biodiversity of the Site. To provide further detail and assessment a *Biodiversity Enhancement and Management Plan* has been prepared by *Lucion Delta-Simons* to accompany the planning application.

As briefly discussed in the previous Section 'Landscape & Urban Greening' of this report, the specific plant species have been carefully selected based on their ability to support locally occurring wildlife whilst being appropriate to the nature and setting of the development. The proposal features an ornamental shrub, green wall, trees, green roof, and amenity grassland to increase both species and structural diversity. These landscaping features will enhance the ecological value of the Site and provide increased foraging opportunities and connectivity for invertebrates, birds, and mammals. All plants and trees have been selected on the right plant right place principle to ensure that the scheme is robust and has longevity. In addition, a range of equipment items are also incorporated into the scheme such as built in swift boxes, built in starling boxes, insect hotels, stainless steel bird feeder and water bath, and bee hives. As a result, the proposal aims to attract a range of insects, birds and bats to the development. Exact locations of species habitats will be identified through the next stage of work RIBA Stage 4.

Management objectives for the ornamental shrub have been proposed to ensure growth of the new planting, and to maintain healthy and attractive planting. As this will ensure the future of the biodiversity, food source to wildlife, and amenity value.

The need for developments to achieve a Biodiversity Net Gain (BNG) became mandatory from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990. Given the pre-development conditions of the site (all buildings and hardstanding), it is considered that the proposal is classified under the De Minimis Exemption from BNG.

Please refer to Section 5.4 of the *Design and Access Statement*. These plant species help achieve on site increase to biodiversity and address the climate emergency. All plants and trees have been selected on the right plant right place principle to ensure that the scheme is robust and has longevity.

To conclude, it is considered that the proposal is compliant with the NPPF, G6 of The London Plan and Policy EM7, Policy DMEI7, and Policy DMHB14 of the Local Plan. For further detail refer to the *Biodiversity Enhancement and Management Plan*.

Daylight & Sunlight

A *Daylight & Sunlight Report* has been undertaken by *Lucion Delta-Simons* to accompany the planning application. The report assesses the on-site daylight and sunlight access to rooms deemed habitable based on relevant industry guidance, as well as the impact on the residential properties to the rear (east) of the site on Reynolds Road.

The assessment has also been undertaken following a request from London Borough of Hillingdon Council to assess the impact of surrounding trees to the proposed development in accordance with the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2022) (the "BRE Guidelines").

The results of the report demonstrate that the Site is suitable for the proposed development in terms of daylight and sunlight and that all of the correct measures have been adhered to, including the 25^o Rule. Furthermore, the report concludes that there are no daylight and sunlight constraints to restrict planning consent being given. Thus, it is considered that the proposal is compliant with planning policy DMHB11 set out in the Local Plan (2012).

Neighbouring Amenity

The NPPF (2023), seeks to ensure that development provides a high standard of amenity for all existing and future users. Similarly, Policy D3 of the London Plan (2021) advises that proposals should 'deliver appropriate outlook, privacy and amenity'. Policy DHB11 (Design of New Development) makes clear that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. Careful consideration has been given to ensure the protection of amenity and privacy for existing and future occupiers and that of neighbouring properties. As a result, the proposed new flats will not have an adverse impact upon the existing levels of visual amenity, daylight, sunlight, and noise. It will not cause any overlooking or loss of privacy to neighbouring dwellings and is in accordance with policy.

The front elevation of the proposal is set at a similar distance with any change considered to be negligible to the existing building on Yeading Lane. As a result, the windows would also provide similar views to those of the existing windows at the site. Therefore, no harm to neighbouring amenities can be portioned to the proposal. The few proposed side elevation windows are secondary windows and could therefore be obscurely glazed.

At the rear of the site, the development is more than 22m away from the nearest residential properties (east) on Reynolds Road. This is 1m greater than the minimum requirement of 21m distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In addition, the proposal provides similar distances and views in comparison with the existing building. As such, the resulting building (whilst including a second floor of residential accommodation) would have rear windows and terraces that provide similar views.

As a result of the above, the proposed building is not considered to cause harmful loss of outlook to those neighbours or their amenity spaces, loss of light, overshadowing, or privacy and is considered to be compliant with both Policy D3 of The London Plan (2021) and Policy DMHB11 of the Local Plan.

Energy & Sustainability

A range of systems and energy reduction measures have been proposed as part of the scheme. These are outlined in the Energy & Sustainability Assessment undertaken by *Lucion Delta-Simons*. It is considered that the proposal is compliant with planning policy set out in the Local Plan (2012) and The London Plan (2021). For further detail please refer to the Energy & Sustainability Assessment accompanied with this application.

Carbon Whole Life Cycle

A *Carbon Whole Life Cycle Assessment* has been prepared by *Lucion Delta-Simons* to support the planning application. The assessment provides detailed results highlighting significant contributing materials and identifies opportunities to reduce embodied carbon emissions. It reviews Embodied Carbon Emissions per Building Element and Emissions per Life Cycle Stage prior to providing a set of recommendations. Further stages are necessary following planning stages however, it is believed that the report provides all the information required with no planning limitations. For further detail please refer to the report.

Noise

An *Environmental Noise Survey and Noise Impact Assessment* has been undertaken by *Hann Tucker Associates* to support the planning application. The report establishes baseline noise conditions and proposes the measures that are required to mitigate noise impacts for the proposed development in accordance with both national and local planning policy as well Part Building Regulations. A summary of the report has been set out as follows.

The findings of the Noise Survey show that the noise levels are above the required levels, albeit not untypical for the vast majority of residential areas of London, and within levels that can be adequately mitigated for. However, a key finding which has been considered is that open windows as a means of background ventilation is not suitable on any façade across the development. Thus, alternative ventilation measures are required, and the following solutions have been recommended.

- Adequate facade sound insulation;
- Suitably specified glazing;
- Attenuated ventilators/ mechanical ventilation systems.

The proposed external amenity areas (rooftop garden spaces) have been considered as part of the assessment. Noise levels in these locations are considered to be acceptable. It is recognised that some balconies at the front façade may be above guidance levels. However, given that the residential dwellings have access to shared rooftop garden spaces which are within guideline noise levels, the proposal is considered to be acceptable.

Noise transfer through the separating floor from the existing ground floor commercial units to first floor apartments has been considered. However, it is considered that a follow up assessment of noise transfer to structurally connected habitable rooms should be undertaken in due course which considers typical noise levels within each commercial unit with the sound insulation performance of the separating construction.

It is considered that the proposal is compliant with planning policy set out in Local Plan Strategic Objective SO10 and Policy EM8, and The London Plan Policy D13, and Policy D14. For further detail please refer to the *Environmental Noise Survey and Noise Impact Assessment* accompanied with this application.

Air Quality

An *Air Quality Assessment* has been prepared by *Lucion Delta-Simons* to support the planning application. The report sets out the findings of the existing air quality conditions, including the sources of pollutants to form an assessment. As part of this, an Air Quality Neutral Assessment has been undertaken which takes into consideration transport emissions and building emissions. In addition, the report also reviews the potential air quality impacts of the Proposed Development during both the construction and operational phases. For both phases, the type, source and significance of potential impacts have been identified, and the mitigation measures that should be employed to minimise the impacts have been made clear. A summary of this report is described below.

The Site is located within an Air Quality Management Area (AQMA). However, the baseline conditions assessment (formed via publicly accessible monitoring and modelling data) indicates that the area within the vicinity of the proposed development is of 'relatively good air quality'. Moreover, there are no predicted or measured exceedances of short or long term air quality objective's (AQOs) for pollutants of concern. Furthermore, future concentrations of pollutants are expected to decrease due to advances in strategies and technologies to reduce emissions.

The assessment of construction phase impacts associated with fugitive dust and fine particulate is listed as follows.

- A medium risk of dust soiling impacts;
- A low risk of increases in particulate matter concentrations due to unmitigated construction activities.

The latter of these can be mitigated through good site practice and the implementation of suitable mitigation measures. Thus, significantly reducing the effect of dust and particulate matter releases.

The residual effects of the construction phase on air quality are considered to be not significant. Furthermore, the Proposed Development is expected to result in a 'negligible impact' associated with the operational phase traffic on nearby receptors as well as on future occupants of the Site. Therefore, the residual effects are considered to be 'not significant'. Furthermore, impacts of poor air quality on future occupants of the Site are deemed 'negligible'.

An Air Quality Neutral assessment was undertaken which concluded that, as there are no anticipated building emissions due to use of air source heat pumps, the development will be car free (other than two blue badge parking places) leading to 'negligible' transport emissions, the development can be considered air quality neutral and in accordance with GLA Policy.

Based on the results of the assessment and the implementation of the proposed mitigation measures, it is considered that the Proposed Development complies with the NPPF, The London Plan Policies SI1, and Policy GG3 as well as Local Plan Policy BE, Policy EM1, and Policy EM8. The proposal is also in accordance with the Institute of Air Quality Management (IAQM) produced guidance and National Planning Policy Guidance (NPPG) for Air Quality.

Fire

A range of systems and fire protection measures have been proposed as part of the scheme. These are outlined in the Fire Assessment undertaken by *Rockland Safety Services Ltd*. The Fire Statement has evidenced the provisions made for the safety of occupants as well as the provision of suitable access and equipment for firefighting. The statement fulfils the requirements of The London Plan (2021) as set out in Policy D12 Part A. For further detail please refer to the Fire Assessment accompanied with this application.

Following a planning consent further development will be made during in the RIBA Stage 4 with Detailed Design. Other relevant guidance documents will also be agreed with the approving authority ahead of submission to the fire service.

Transport & Highways

The site is located in a highly sustainable location with good access to local services, amenities, and social infrastructure along Yeading Lane and in the wider local context. This includes the existing amenities on the ground floor which the proposal seeks to retain. Making the site a “walkable neighbourhood” Furthermore, the site is also located in an area with a PTAL rating of 2. Thus, giving a further indication of the site’s excellent connectivity to public transport. Specifically, bus services in which the nearest bus stops are within 100m from the site. As a result of the above, the proposal is not reliant on private vehicle ownership as the site is in a prime location for residents to utilise both public transport and sustainable means of transport.

The Application site has a pedestrian access at the north of the site between 278 Yeading Lane and 340 Yeading Lane with a lockable gate. The site has a vehicle access with a lockable gate located to the south of the site between 266 Yeading Lane and 264 Yeading Lane.

A combined Parking Survey and Transport Statement has been prepared by Kronen Ltd to accompany the planning application. The Parking Survey assesses the existing parking conditions on streets surrounding the site and the net parking impact of the proposal.

The proposal includes the use of the existing vehicle access to serve 2 disabled / blue badge permit holder spaces. Following the pre-application advice sought from the Council and the Written Response which was received on January 2024 it was suggested that the Council would like to see restrictions in place to limit these spaces for only their intended use, to which the applicant is willing to enter into via a Section 106 legal agreement with the London Borough of Hillingdon. Furthermore, should the Council wish to do so, the Council could restrict future residents of the development from applying for a permit to join any parking management scheme in the vicinity of the site.

The proposal is in compliance with London Plan (2021) for the provision of accessible parking. Policy T6.1 states a requirement of 1 accessible parking space for every 3% of dwellings. For this proposal (14 dwellings), this means approximately 0.42 accessible spaces which has been rounded up to one space. However, to ensure full compliance and as a social benefit the scheme has proposed two accessible parking spaces.

Car parking provision for the existing retail units on the ground floor require parking at a rate of 1 space per 50 sqm. The specific number of spaces will depend on the total retail area but will be provided as per the standard. For cycle parking where non-food retail space (over 100 sqm)

is proposed, the London Plan requires 1 long-stay secure and covered cycle parking space per 250 sqm for the first 1000 sqm. It is proposed that these cycle parking facilities will be located on the west side of the building.

The proposal is akin to the Council's Strategic Objective's. Specifically, SO18 which seeks to improve access to local services and facilities. The scheme also promotes efficient use of public transport and is in accordance with SO22. Furthermore, the location of the development should be considered as a prime area for development. Therefore, the scheme is in complete accordance with Policy T1 (Local Plan). As a result, the Council should seek to support the proposal, as development should be steered towards the most appropriate locations and proposals that both utilise and provide sustainable transport methods.

For planning decision making in relation to transport and highways matters the NPPF is explicitly clear. It states that, 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe' (Para. 115). For further detail please refer to the Transport Assessment & Parking Survey accompanied with this application prepared by *Kronen Ltd*.

Design and Appearance

A Design and Access Statement has been submitted in support of this application which sets out the design rationale for the proposed development.

As set out in Chapter 2 of this report, the proposal seeks to convert the existing five three-bedroom units will be converted into 4 two-bedroom apartments and 1 one-bedroom M4(3) accessible apartment to meet updated London Plan standards. To compensate for the reduction in family-sized homes, the plan extends the first floor to create four new three-bedroom duplex dwellings, each with an upper floor dedicated to bedrooms. A new second floor will be added to accommodate the duplex units and for the provision of 5 two-bedroom flats. The units are provided with private balconies / terraces as individual amenity areas. The sizes of the units, their balconies and floor to ceiling heights, amongst other areas have been designed to be fully compliant with Nationally Described Space Standards (NDSS) and with Policy DM10 of the Local Plan.

The proposal features all of the characteristics and traits that are akin to the NPPF's (Chapter 12) criteria of 'good design' for which developments planning decisions should be given and Policy D4 of The London Plan. These have been listed below:

- a) The residential units and shopping parade function well both together and individually. Furthermore, the proposal will add to the overall quality of the area, for both the short term and over the lifetime of the development;
- b) The scheme is visually attractive as a result of good architecture (form and appearance), layout and appropriate and effective high quality integrated landscaping;
- c) The proposal is sympathetic to local character by introducing pitched roofs to the existing building to integrate itself with the surrounding built environment. Moreover, it does this whilst increasing the density of the development;
- d) The scheme will establish or maintain a strong sense of place on Yeading Lane, through its form and materials to create attractive, welcoming and distinctive place to live, work and visit as a mixed-use development;

- e) The development will optimise the potential of the site and make effective use of the land. It will also accommodate and sustain an appropriate amount as well as mix of development in line with National Described Space Standards and the London Plan Housing Design Quality Standards;
- f) The proposal has active frontages to create places that are safe and is designed for disabled users. Thus, making the development inclusive and accessible. In addition, the development features balconies (private amenity spaces) for all of the residential dwellings and has a shared rooftop garden which are in accordance with noise guidelines. Moreover, the scheme is designed to have appropriate insulation, windows and ventilation systems to avoid overheating and keep outside noise from cars and flight paths to within healthy levels. The scheme has active frontages to reduce potential of crime and disorder. In addition, lighting will be acutely placed to increase security at the sides and rear of the development.

The development enhances the local context by delivering a building that positively responds to the existing development footprint, and orientation, whilst seeking to create a local distinctiveness through introduced roof pitches. The design has been carefully considered with regards to scale, mass, appearance and shape to ensure that the proposal is sympathetic to respectful of neighbouring properties. Specifically, with regards to daylight and sunlight, privacy, and overshadowing. Furthermore, the roof is pitched away from the side boundaries to be less imposing or dominant to the neighbouring properties. In addition, the proposed materials respond to the existing character of place and street scene by using bricks which is a dominant feature of the area. Therefore, it is considered that the proposal is in accordance with Policy D3 of The London Plan (2021) and Policy BE1, Policy DMHB11, and Policy DMHB12 of the Hillingdon Local Plan

The proposal also seeks to provide new facilities for bin and bicycle storage. Sustainability features are also a key characteristic of the proposal, including solar panels on the roof, and air source heat pumps. These elements aim to improve energy efficiency and environmental performance, supporting Chapter 02 (Achieving sustainable development) and Chapter 12 (Achieving well-designed places).

CONCLUSION

This proposal for the development of the existing site to introduce 14 new residential units (C3 use class) via an additional storey with internal alterations to accommodate changes to the housing mix, and associated landscaping represents a sustainable and well-considered development that aligns with both national and local planning policies.

The proposal demonstrates a strong commitment to sustainable development, aligns with the strategic vision of London Borough of Hillingdon Council, and contributes positively to the local housing market while preserving environmental and community values. It is therefore our firm belief that the proposal should be determined with a positive decision.

We trust the information enclosed is sufficient to enable the application to be validated within the statutory 28-day period, and we look forward to receiving confirmation of this shortly. We look forward to receiving a planning decision within the statutory period of 13 weeks.

Furthermore, it is our understanding that the above details provide the *London Borough of Hillingdon Council* with enough information for the application to be considered and in the instance that further information is required or sought after we kindly request that the Council do not hesitate to get in contact.

Create Design and Create Planning are the Planning Agent involved in the project. Should the Council require any assistance or additional information they should make contact as soon as possible and a member of staff at Create will respond in a timely manner.