



# REPORTS 4 PLANNING

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## TECHNICAL NOTE - HIGHWAYS

KUMARASAMY SIVAKUMARAN

152 – 154 UXBRIDGE ROAD

HAYES

UB4 0JH

**Consultant:**

Mr. D Godber

Consultant in Transportation

Report Ref: 215516TRA

Report Date: **13<sup>th</sup> December 2021**



## 1.0 Introduction

- 1.1 This Technical Note has been prepared to address the Traffic & Transportation issues raised by the London Borough of Hillingdon (LBH) in respect of a proposed development at 152-154 Uxbridge Road, Hayes, UB4 0JH. A copy of LHB's comments are contained in **Appendix A** of this document.
- 1.2 It is proposed to redevelop the existing building to accommodate 9 residential units over three storeys and a commercial retail unit on the ground floor. The proposals comprise a five 2 bedroom apartments along with four and 3 bedroom apartments. The proposed ground floor layout is shown on drawing number 5005/200 in **Appendix B**.
- 1.3 The site is located on the northern side of Uxbridge Road adjacent to its junction with Brookside Road. The surrounding area is town centre in character.
- 1.4 This document will investigate and respond to the points raised by LBH, which can be summarised as:
- Provide details of the footway vehicle crossover access into the proposed car parking area;
  - Confirm that the proposed vehicle parking bays are dedicated to a specific apartment;
  - Comment upon the level of secure cycle parking that will be provided;
  - Carry out swept path analysis to demonstrate that vehicles can pull into the development without hindering through traffic on Brookside Road;
  - Outline how refuse will be collected from the development;
  - Provide details on the frequency and type of servicing for the retail unit.

## 2.0 Proposed Access Arrangements

- 2.1 The existing retail units has a vehicular access from Brookside Road. It is proposed to provide a new footway crossover style access to the new car parking area within the development off Brookside Road and also a loading bay that will also be within the site.
- 2.2 The locations of the proposed access and servicing bay can be seen on the drawing within **Appendix B**.
- 2.3 The proposed vehicular access adopts nominal 3.0m radii over the footway and an entrance width of 5.1m at the rear of footway. In order to accommodate the turning movements of vehicles drop kerbs should be provided for 10.7m. The dimensioned layout is shown in **Appendix C** of this document.
- 2.4 The planning application proposes a new building above the vehicular access with a minimum vertical clearance of 2.1m which meets the minimum clearance required for a car park entrance.

### 3.0 Proposed Parking Provisions

- 3.1 When assessing new development, it is necessary to consider the level of car parking that would be provided for future residents. Appropriate guidance for maximum residential parking provisions is published within Steer Davies Gleave document; 'Hillingdon Parking Standards Justification', an extract of this is shown in **Appendix D** of this document.
- 3.2 This document confirms that LBH falls within Outer London. Consequently the following residential car parking provisions are recommended:

**Table 1: Proposed Parking Standards with London Plan (2016) – Extract**

| Residential        | London Plan Outer London Standard | Hillingdon Proposed Standard |
|--------------------|-----------------------------------|------------------------------|
| Residential Studio | Max 1                             | 0.5                          |
| Residential 1 bed  | Max 1                             | 1 to 1.5/2                   |
| Residential 2 bed  | Max 1                             | 1 to 1.5/2                   |
| Residential 3 bed  | Max 1.5                           | 2                            |
| Residential 4 bed  | Max 2                             | 2                            |

- 3.3 As can be seen from the proposed layout drawing, the development would provide five 2 bedroom and four 3 bedroom apartments, each of which would have a car parking space within the demise of the site.
- 3.4 The proposed parking provision for the 2 bedroom dwellings is in accordance with the maximum suggested while the 3 bedroom dwellings are marginally under the suggested 1.5 spaces per dwelling. However, it is considered that 1 space per dwelling is appropriate for this site's town centre location and should be considered acceptable to the Highway Authority.
- 3.5 Each car parking space would be allocated to the corresponding apartment number.

#### **Proposed Cycle Parking**

- 3.6 LBH suggest that 2 and 3 bedroom dwellings should provide 1 and 2 cycle spaces respectively. It is proposed to provide 10 covered secure cycle spaces, which equates to a slight under provision.
- 3.7 It is considered that the sustainable location of the application site would reduce the need to use cycles to carry out every day trips. Therefore the proposed 10 spaces should be considered acceptable to the Highway Authority.

## 4.0 Swept Paths & Servicing Arrangements

- 4.1 Having commented on the level of car parking provision it is necessary to demonstrate that the car parking spaces can be accessed by future residents vehicles.
- 4.2 In order to demonstrate that the layout could accommodate the turning movements associated with a residential parking spaces swept path analysis has been carried out using the most up to date version of the computer software 'AutoTRACK'. The swept paths undertaken are based upon a medium private car within the DB32 section of the vehicle database. The results are shown on drawing number **2021/031/002** in **Appendix E** of this document.
- 4.2 As can be seen residential vehicles can enter the site, park, turn around and exit the car park in forward gears, without impacting on the operation of through traffic on Brookside Road.
- 4.3 It is considered that the above investigations demonstrate that the proposed car parking layout accommodates the necessary vehicle turning movements and should be acceptable to the Highway Authority.

### Proposed Servicing Arrangements

- 4.4 It is proposed that the commercial retail unit would be serviced by a 3.5tonne panel van approximately 2 or 3 times per week. It is considered that the relative small floor area of the retail unit would not warrant HGV deliveries on a regular basis.
- 4.4 In addition to the above swept paths the drawing in **Appendix E** also illustrates a panel van entering and exiting the servicing bay of the proposed commercial retail unit. It is considered that the swept path analysis carried out demonstrates that retail unit can be adequately serviced without unduly disrupting the traffic on Brookside Road.

## **5.0 Summary**

- 5.1 This document has been prepared to investigate the issues raised by LBH in respect of the proposed development at 152/154 Uxbridge Road, Hayes of 9 residential dwellings and a commercial retail unit on the ground floor.
- 5.2 The proposed footway crossover style access to the development meets with current design guidance and accommodates the turning movements of residential vehicles.
- 5.3 The proposed level of car parking provision falls within the maximum allocation as described by LBH guidelines and should be considered appropriate for a development in a sustainable location.
- 5.4 The swept path analysis undertaken demonstrates that future residents would be able to access their car park spaces and that the commercial retail unit could be adequately serviced.
- 5.5 The investigations carried out within this document demonstrate that there are no significant highway-related issues that should prevent the proposals from gaining approval from the Highway Authority.

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## **APPENDIX A – LONDON BOROUGH OF HILLINGDON COMMENTS**



Ms4 Architects Limited  
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Planning Applications Team  
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Tel: 01895 250230  
Case Officer: Richard Phillips  
Email: [rphillips@hillington.gov.uk](mailto:rphillips@hillington.gov.uk)  
Date: 19th July 2021  
Our Ref: 4482/PRC/2021/60

Dear Ms4 Architects Limited

**RE: Demolition of existing building and erection of a 3 storey building containing 9 x 2 bed apartments, 1 no retail unit, car and cycle parking, bin stores and associated development thereto**

**SITE: 152-154 Uxbridge Road Hayes**

I refer to your request for pre-application planning advice dated 5/3/21 and our subsequent meeting on 15/4/21 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: 20157LSa (Topographical Survey) - received 15 Mar 2021  
201571 (Existing First Floor Plan) - received 15 Mar 2021  
20157G (Existing Ground Floor Plan) - received 15 Mar 2021  
20157Ea (Existing Elevations) - received 15 Mar 2021  
Agent's email dated 7/5/21 - received 07 May 2021  
Pre-Application Meeting Minutes - received 07 May 2021  
Design Development Report - received 07 May 2021  
101 Rev. P2 (Location Plan) - received 15 Mar 2021  
100 Rev. P2 (Block Plan) - received 15 Mar 2021  
20157RP (Existing Roof Plan) - received 15 Mar 2021  
Design and Access Statement - received 15 Mar 2021  
Pre-Application Planning Statement - received 15 Mar 2021

**Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.**

#### **The Site and Surrounds**

The application site is located on a prominent corner plot on the northern side of Uxbridge Road, at its junction with Brookside Road and forms part of what would have originally been a

balanced terrace of shops fronting Uxbridge Road with living accommodation above which is likely to date to the early part of the C20th. The application site itself forms the end unit(s) within the two / three storey retail parade and incorporates residential accommodation within its roof and comprises a retail store on the ground floor with a 5 bedroom apartment on the floors above. The site projects beyond the side elevation of the parade to the back edge of Brookside Road and along this road frontage forms a yard area, mainly in use for the parking of vans.

The site forms part of a small retail parade with 8 retail units and on this side of Uxbridge Road, the character of the area either side of the parade is mainly comprised of traditional 2 storey residential properties. On the other side of the road, the character is more mixed with retail parks and business units and the 12 storey high Hyatt Hotel.

The site forms part of the 124 - 152 Uxbridge Road Local Parade, as designated in the Local Plan: Part 2 (2020). It also forms part of Hillingdon's Air Quality Management Area and is located within the Ossie Garvin Air Quality Focus Area. The site is within a 250 metre buffer zone of a former landfill site and a gas pipeline runs along Brookside Road.

## **The Proposal**

The proposal is for the demolition of part of the existing parade building and the erection of a 3 storey attached building comprising a retail unit on the ground floor fronting Uxbridge Road and a total of 9 residential units above and to the rear fronting Brookside Road. Following the receipt of revised plans, the ground floor would comprise the retail unit with a floor area of some 220sqm, with servicing and car parking space behind with a 2 bedroom, 4 person unit to the rear. The floors above would each comprise 2 x 2 bedroom, 4 person and 2 x 3 bedroom, 5 person units with private balcony / amenity space. The roof would provide 2 x 103sqm communal amenity areas.

## **Planning Policy**

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)  
The Local Plan: Part 2 - Development Management Policies (2020)  
The Local Plan: Part 2 - Site Allocations and Designations (2020)  
The London Plan (2021)  
The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

### **Part 1 Policies:**

|         |                                           |
|---------|-------------------------------------------|
| PT1.BE1 | (2012) Built Environment                  |
| PT1.EM6 | (2012) Flood Risk Management              |
| PT1.EM8 | (2012) Land, Water, Air and Noise         |
| PT1.CI1 | (2012) Community Infrastructure Provision |

### **Other Policies:**

|        |                                                                 |
|--------|-----------------------------------------------------------------|
| LPP D2 | (2021) Infrastructure requirements for sustainable densities    |
| LPP D3 | (2021) Optimising site capacity through the design-led approach |
| LPP D4 | (2021) Delivering good design                                   |

|          |                                                              |
|----------|--------------------------------------------------------------|
| LPP D5   | (2021) Inclusive design                                      |
| LPP D6   | (2021) Housing quality and standards                         |
| LPP D7   | (2021) Accessible housing                                    |
| LPP D11  | (2021) Safety, security and resilience to emergency          |
| LPP D12  | (2021) Fire safety                                           |
| LPP D14  | (2021) Noise                                                 |
| LPP H10  | (2021) Housing size mix                                      |
| LPP G5   | (2021) Urban greening                                        |
| LPP SI1  | (2021) Improving air quality                                 |
| LPP SI5  | (2021) Water infrastructure                                  |
| LPP SI3  | (2021) Energy infrastructure                                 |
| LPP T2   | (2021) Healthy Streets                                       |
| LPP T4   | (2021) Assessing and mitigating transport impacts            |
| LPP T5   | (2021) Cycling                                               |
| LPP T6   | (2021) Car parking                                           |
| LPP T6.1 | (2021) Residential parking                                   |
| LPP T6.3 | (2021) Retail parking                                        |
| LPP T7   | (2021) Deliveries, servicing and construction                |
| DMTC 3   | Maintaining the Viability of Local Centres and Local Parades |
| DMH 1    | Safeguarding Existing Housing                                |
| DMH 2    | Housing Mix                                                  |
| DMHB 11  | Design of New Development                                    |
| DMHB 12  | Streets and Public Realm                                     |
| DMHB 13  | Shopfronts                                                   |
| DMHB 14  | Trees and Landscaping                                        |
| DMHB 15  | Planning for Safer Places                                    |
| DMHB 16  | Housing Standards                                            |
| DMHB 18  | Private Outdoor Amenity Space                                |
| DMEI 2   | Reducing Carbon Emissions                                    |
| DMEI 10  | Water Management, Efficiency and Quality                     |
| DMEI 12  | Development of Land Affected by Contamination                |
| DMEI 14  | Air Quality                                                  |
| DMCI 7   | Planning Obligations and Community Infrastructure Levy       |
| DMT 1    | Managing Transport Impacts                                   |
| DMT 2    | Highways Impacts                                             |
| DMT 5    | Pedestrians and Cyclists                                     |
| DMT 6    | Vehicle Parking                                              |

## **Main Planning Issues**

### **1. Principle of development**

#### **Local Parade**

The site forms part of the 124 - 152 Uxbridge Road Local Parade, as designated in the Local Plan: Part 2 (2020). The replacement of the retail unit is therefore required and supported by Policy DMTC 3. It is noted that a stairwell that previously divided the floor space has been re-sited which is welcomed. Every opportunity should still be taken to ensure that the size of the shop unit is maximised in order that a comparable replacement retail unit is provided.

## Housing Size Mix

Policy DMH 2 of the Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021) outline that schemes should consist of a range of unit sizes, including family sized homes which are defined as those of three bedrooms or more. The revised design does provide a better mix of units, including 4 family sized units which is welcomed.

## 2. Design

The Council's Conservation / Urban Design Officer provided the following comments on the revised scheme:-

### Block to Uxbridge Road

The Uxbridge Road frontage needs to be carefully detailed. It would be useful for the terrace elevation to be shown in full so that it can be determined how well the development sits within the group. The gable ends and dormer window should match the pitch of the existing and be of the same dimensions of the original parts of the terrace. There are concerns that the eaves of the dormer window of the proposed scheme looks lower than its neighbours.

Careful attention also needs to be given to the fenestration. The windows to the gable end fronting Uxbridge Road and the one at the western end are of taller proportions than those in the rest of the terrace and do not respect the hierarchy of floor levels within the development and wider terrace.

The roof plan of the amended scheme received 7th May 2021 appears to have been drawn incorrectly as the building appears to sit forward of the terrace's front building line and the roof pitches appear to be of different lengths suggesting that it is an uneven pitch. This does not correspond to the elevational drawings. Attention should also be given to the established ridge line of the terrace and for this to be respected in any future scheme. The roof plan also does not show the gable end to Uxbridge Road or the dormer window.

It is considered that the building to Uxbridge Road needs to be carefully designed so that it does not jar within the terrace and appears as a more 'seamless' extension.

### Blocks to Brookside Road

It is unclear how the under-croft car parking works. The elevational drawings and ground floor plan suggests that the brick columns would extend down into the car parking spaces.

The under-croft entrance area could also be improved as it appears quite open to the street creating an unattractive visual void at the base of the building. This could be improved if the brick pier was increased in width and has the same alignment of the brickwork above. The proposed open section to the right-hand side of the vehicular access may appear better if it were infilled to screen the cars along with additional planting. This would also improve the entrance area into the flats.

The roof top amenity spaces are enclosed with glass balustrades. It is unclear where these are to be positioned on the roof, but it would be considered appropriate for these to be set back behind the parapet so that they are less prominent and secondary elements to the facade. Glass balustrades can also be detracting elements that reflect movement and draw undue attention. It is suggested that metal railings be considered as an alternative.

Particular attention should be paid to the flank wall of the flatted block adjacent to the access road to the north and No. 2 Brookside Road. The houses and proposed block do not have the same building line and as a consequence the proposed block would sit forward in the street in views looking south along Brookside Road revealing an unattractive bland featureless three-story wall. It should be investigated how this could be enlivened / broken up

with architectural detailing. It is also considered that there is insufficient space to allow for planting along this boundary. The northern part of the block should be set back from the boundary to allow for planting which will also help to visually soften the flank wall.

It is also unclear how the private amenity spaces works for example Plot 02-03 and 02-04 show doors leading out onto amenity spaces which isn't shown on the elevation?

It is appreciated that the scheme is currently in a 'sketchy' form, however, the scheme does appear to be moving in the right direction and is an improvement on the original proposal.

It is suggested that the above comments be taken into consideration when further developing a scheme for the site. Should a further pre-app be sought then we will need all the elevations of the development to be submitted so that comprehensive comments can be given in particular in it unclear what happens to the rear of the blocks.

### Signage

Any signage should be located at the same height and have a similar depth as the existing fascias within the parade. Any illuminated signage is likely to require separate advertisement consent.

### Landscaping

The London Plan promotes the Urban Greening Factor, with residential units seeking to achieve a score of 0.4. A full submission will need to provide a measured diagrammatic plan and associated calculations to show the UGF score.

The landscaping outside the ground-floor flats is required to secure defensible space and a degree of security and privacy for the occupant(s). The depth of this space should be a minimum of 2m.

The provision of a roof garden is welcome, however, it must be planned and designed from the outset and details presented in the D&AS to ensure that the associated costs and structural implications are factored in from the start and not 'value engineered' at a later stage. The roof garden should be accessible and attractive to users. Microclimate should be considered to ensure that the space is comfortable for users.

This is also an Air Quality Monitoring Area. The hard and soft landscape proposals should be designed to mitigate the effects of poor air quality where possible.

## 3. Amenity

### Internal Amenity

The proposed units do provide internal floor areas that satisfy the minimum floor space standards of Policy D6 of the London Plan and Hillingdon's Local Plan Part 2, Policy DMHB 16. All the units are also dual aspect and although some of the windows, particularly those fronting Uxbridge Road are not shown, they appear to be capable of providing adequate outlook and sunlight to their habitable rooms. The scheme would also need to satisfy the other policy criteria of Policy D6 of the London Plan. In particular, some of the bedrooms appear to be undersized.

In order to ensure that the residential units provide suitable living space, you would need to undertake a Noise Assessment to ensure that external noise sources are mitigated.

### External Amenity Space

In order to satisfy the requirements of Policy DMHB 18 of the Hillingdon Local Plan: Part

Two, a total of 245sqm of external amenity space needs to be provided (5 x 25sqm and 4 x 30sqm). From the submission, it is not possible to measure the areas of the private balcony / Amenity spaces and it is also likely that the two 103sqm roof top amenity areas may not be able to provide this amount of usable amenity space once the screens have been set back from the edges of the roof (See Design Officer's comments).

#### Amenity of Adjoining Properties

With the careful siting of the blocks, positioning of the windows and use of privacy screens, it appears that the proposal would not result in any undue adverse impact upon its neighbours in terms of loss of sunlight, dominance and loss of privacy. However, this would need to be carefully assessed on site when a planning application is received and you are advised that a Daylight and Sunlight Assessment should be undertaken for the proposed properties and the nearest adjoining neighbours.

#### 4. Highways

##### Highway Issues

The Highway Engineer advises that due to the size of the proposed development, neither a transport assessment or travel plan is required (however, see Air Quality Officer's comments below). The Council would require details of the dimensions of the vehicle crossover / access and this would need to be in line with Council vehicle crossover policy, available on the website. Confirmation that the numbers assigned to the parking bays relate to the flat they are allocated to is required.

However, there is still no tracking provided for the car park and delivery bay and as this is a restricted car park, the Council would need to be confident that vehicles will not have to wait too long on the highway to get into the site if cars are moving within the car park. Both car parking and cycling parking is being provided in line with current policy standards and electric charging points have been shown which are acceptable. Further details will be required about how the refuse will be collected. The Council would need details on the frequency, type and how serving for the retail element will occur.

##### Accessibility

The Council's Accessibility Officer advised on the original submission:-

1. Any future planning application would need to satisfy the requirements of London Plan policy D7. To this end, reference should be made to the Council's 'Accessible Hillingdon' SPD (adopted September 2017).
2. The application should demonstrate how a development proposal for a new residential scheme satisfies the functional and spatial provisions for accessible and adaptable housing.
3. To ensure the requisite standards are met, particular attention should be paid to the clear access zones within the entrance level WC, and spatial requirements within entrance lobby, kitchen, bedrooms and bathrooms.
4. Floor plans submitted as part of a planning application should be at a scale of at least 1:100, and should include furnished planned layouts, and clearly demonstrate the access zones and other provisions as set out in Approved Document M to the Building Regulations.
5. The pre-application plans show that unit 00\_01 would not be accessible directly from the car park. Access into the building should be made possible directly from the car park.
6. Units 01\_03, 02\_03, 01\_04, and 02\_04 are shown to be accessible by a staircase, without the benefit of lift access. The above policy requires all new residential dwellings to achieve step free access via the principle private entrance. The design submitted at this pre-application stage does not achieve an accessible standard of accessibility.
7. Full access for older and disabled people must be provided throughout the development, including step-free access to private and shared roof gardens, balconies, other amenity areas, and all storage areas.

In terms of the revised pre-app plans, the officer advises that the information and revised pre-app plans are now satisfactory from an accessibility standpoint, but notes that internal floor plans would need to be shown at a scale of 1:100 demonstrating that the required clear access zones can be achieved with typical furniture items in place.

## 5. Other

### Water Use / SuDS

Policy SI 5 of the London Plan (2021) states that development should minimise the use of mains water and protect water supplies and resources should be protected and conserved in a sustainable manner.

Policy SI 13 of the London Plan (2021) requires the use of sustainable drainage measures and amongst other criteria, development proposals should aim to achieve green field run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Any application should be able to demonstrate compliance with the above policies.

### Crime Prevention

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

Any grant of planning permission would be subject to a secure by design condition would be attached to achieve appropriate accreditation. You may wish to contact the Metropolitan Police's Secure by Design Officer, PC Robert Palin who can be contacted on 020 8733 5245 or by e-mail on [Robert.Palin@met.pnn.police.uk](mailto:Robert.Palin@met.pnn.police.uk)

### Air Quality

#### Policy

The development must demonstrate compliance with:

- LBH Local Plan Part 1, Policy EM8
- LBH Local Plan Part 2, Policy DMEI 14
- London Plan (2021) Policy SI 1

#### Location

The proposal is for the demolition of the existing building and the erection of a 3 storey building containing 9 X 2 / 3 bed apartments and 1 retail unit. The development is located within the declared Air Quality Management Area and within the Ossie Garvin Air Quality Focus Area. Focus Areas are defined as places where the pollution levels are already elevated and therefore improvements are required.

#### Comments

In order to be compliant with policy the development must demonstrate:

- it is at least air quality neutral;
- it includes sufficient mitigation to ensure that the demolition, construction phase and

operational phases to do not impact on relevant receptors. This includes both existing receptors and those newly introduced by the development; - that the demolition and construction phases are carried out in accordance with the relevant Mayor of London guidance;

- that the design aspects have been assessed to provide a clean by design development.

Examples are given in the Mayor of London's Sustainable Design and Construction SPG such as the use of Ultra Low NOx technologies and low/zero emissions technologies for energy, low/zero technologies for associated traffic, protection of new receptors from pollution sources such as road traffic, emissions from flues etc. Such measures should be prioritised and included where relevant;

#### Requirements on application

The development will require an air quality assessment including an Air Quality Neutral assessment. Specific advice on scope can be given at the appropriate time. It should be noted that the accuracy of the air quality assessment will depend upon the inputs and full implications of the transport impacts. Any discrepancies in the transport assessment will raise concerns as to whether the full air quality implications have been adequately demonstrated. As the development is within an Air Quality Focus Area it is not sufficient to just meet air quality neutral. This is supported by the Publication London Plan which explains that just meeting air quality neutral benchmarks will not always be sufficient to prevent unacceptable local impacts, especially where these are affected by factors such as location. Once the appropriate on-site mitigation measures have been incorporated, the remaining development emissions will be required to be off-set. This can be provided in total by the developer or in part by providing funds to support off-site measures to improve air quality. The pollution damage costs associated with the emissions from the development will inform the degree of mitigation that is required.

In regards to construction the development will need to demonstrate compliance with the Mayor of London's Control of Dust and Emissions SPG which includes the requirement to comply with the requirements of the Non Road Mobile Machinery Low Emission Zone.

#### Land Contamination

The site is within a 250 metre buffer zone of a former landfill site. Land contamination issues must be sufficiently addressed in any environmental assessment to accompany a planning application, including consideration of the fact that contamination may have spread beyond the development site boundary and that a wider area may require monitoring and/or treatment.

Applications for sensitive developments should therefore be supported by a phased approach to investigation of land conditions at the site, commencing with a desk top study confirming known or potential contamination issues, all in accordance with Environment Agency guidance documents e.g. Land contamination:: risk management (LC:RM).

The level of additional information and/or action required will vary dependent on findings of the desk top study and any of the LPAs' concerns regarding land contamination.

#### Preliminary observations:

The site is within a 250 metre buffer zone from a former landfill site.

Made ground is likely to be present.

An Electrical Substation is adjacent.

Due to the age of the existing property, there is a possibility that asbestos will be present in