

# Proposed Foodstore at Victoria Road, South Ruislip

## Flood Risk Sequential Test

On behalf of **Lidl UK**



Project Ref: 32675 | Rev: | Date: November 2014



## Document Control Sheet




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Revision	Date	Description	Prepared	Reviewed	Approved

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# 1 Introduction

## 1.1 Introduction

- 1.1.1 Peter Brett Associates has been instructed by Lidl UK to prepare a Sequential Test in relation to flood risk, for the proposed development of a 1,286 sq. m (net sales) Lidl foodstore and associated works on the site of the former Imperial Garage, Victoria Road, South Ruislip.
- 1.1.2 The purpose of this document is to demonstrate that the site complies with the Sequential Test in accordance with the requirements of the National Planning Policy Framework (NPPF) and its accompanying Technical Guidance. It has been undertaken in accordance with the Environment Agency's standing advice note issued April 2012: Demonstrating the Flood Risk Sequential Test for Planning Applications. The report acts as an Addendum to the Flood Risk Assessment, also prepared by Peter Brett Associates.
- 1.1.3 As confirmed by the Flood Risk Assessment, the site lies within Flood Zone 2. A plan showing the location of the flood zone boundaries in relation to the site is submitted with the FRA. As such, to comply with the requirements of the Sequential Test it must be demonstrated that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate for the type of development or land use proposed.
- 1.1.4 Therefore this report considers potentially available sites for commercial development within the Local Authority's geographical boundary. The approach to the assessment and its findings are set out in Section 2.

## 2 Site Context

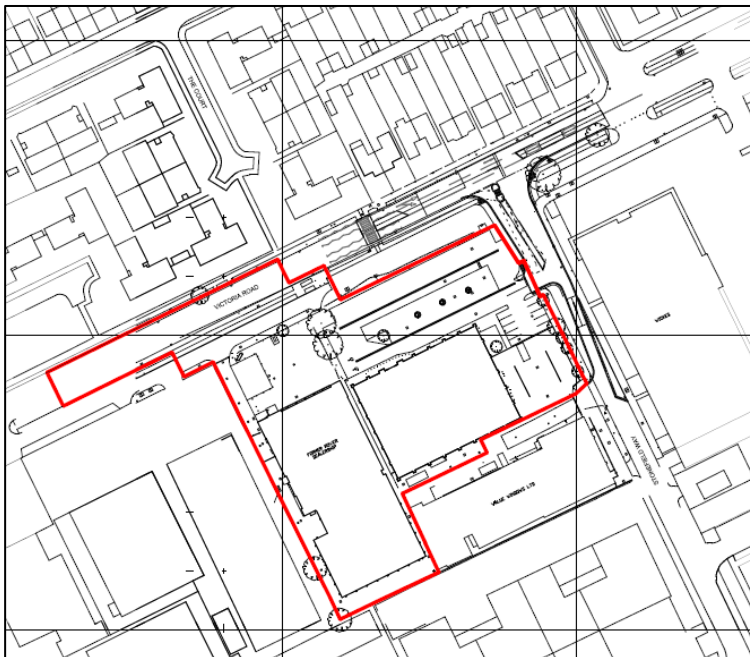
### 2.1 The Site and Surroundings

2.1.1 The site is located on the southern side of Victoria Road to the west of its junction with Stonefield Way. The site is 0.85 hectares and comprises a standalone retail warehouse (subdivided into two retail units), a vacant former car sales showroom, and ancillary parking and services areas. See Location Plan below (Figure 2.1).

2.1.2 The site is bound on either side by retail warehouse uses, notably:

- To the east is a freestanding Wickes and South Ruislip Retail Park, which is occupied by Carpetright, Furniture Village and Halfords;
- To the west is a DFS, Curry's, Victoria Retail Park and Brook Retail Park;
- To the north of Victoria Road primarily by residential development; and
- To the south by a mix of traditional employment and retail trade uses.

Figure 2.1: Location Plan



2.1.3 It should be noted that the wider area (including the application site) is designated within the adopted London Borough of Hillingdon Unitary Development Plan (adopted 1998) as an 'Industrial Business Area'.

2.1.4 Further, the site is situated circa 600m west of South Ruislip Local Centre and is therefore out-of-centre in retail terms, as defined by the National Planning Policy Framework (NPPF).

## 2.2 Proposals

- 2.2.1 The proposal seeks full planning permission for 1,286 sq. m (net sales) Lidl foodstore and associated works on the site of the former Imperial Garage.

## 2.3 Planning History

- 2.3.1 The two retail units were originally permitted in September 1993 as a single unit (ref. 41266C/93/476). An application to sub-divide these two units was granted in August 1994 (ref. 41266M/94/1012). This permission was subsequently implemented. No conditions were attached which controlled the operation or range of goods which could be sold from the two new retail units.
- 2.3.2 In November 2011 the previous owner of the site applied for a Certificate of Lawful Use to confirm that the lawful use of both of the units is for any purposes within Class A1. This Certificate was granted in February 2012 (ref. 64229/APP/2011/2759).
- 2.3.3 We understand the Imperial Garage site was originally constructed in 1997 and formerly operated as a car sales show room (use Class Sui Generis).
- 2.3.4 The application follows a planning application for construction of an A1 discount food store with associated car parking and landscaping on the site of the former Imperial House and external refurbishment of Units 1 and 2 which was refused on 11 April 2014 (ref. 5039/APP/2014/143).
- 2.3.5 The Council's online planning search facility confirms that there is no further planning history relevant to the present application.

## 3 Sequential Test

### 3.1 Introduction

- 3.1.1 The Environment Agency flood map indicates that the site is located within Flood Zone 2 and as a result this assessment has only considered sites sequentially preferable to Flood Zone 2, whereby the annual probability of flooding is classified as greater than 1 in 1000 but less than 1 in 100 in any given year (refer to Flood Risk Assessment report for further details).
- 3.1.2 The National Planning Policy Framework (NPPF) states that the overall aim of decision-makers should be to steer new development to Flood Zone 1 and where there are no reasonably available sites in Flood Zone 1, they should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 and then Flood Zone 3 (paragraph 101).
- 3.1.3 Further, it should be noted that buildings for commercial use are classified as 'Less Vulnerable' in the Flood Risk Tables in the National Planning Policy Guidance which supports the NPPF. Less vulnerable uses are considered to be appropriate in all but functional flood plains (Flood Zone 3b) and in the case of sites within Flood Zone 2, means that the Exception Test is not required to be undertaken.
- 3.1.4 Accordingly, and in summary, in order to meet the requirement of the Sequential Test it must be demonstrated that there are no '*reasonably available*' sites within a lower probability of flooding that would be appropriate for the type of development proposed.

### 3.2 Approach for the Sequential Test

- 3.2.1 Our approach to meeting the requirement of the Sequential Test includes three tasks:

#### Task 1 – Site Identification

- 3.2.2 The first task is to identify the alternative sites to be tested. There is no comprehensive list of appropriate sites, therefore a variety of the London Borough of Hillingdon Policy documents have been used to identify possible sites.
- 3.2.3 This assessment will consider those sites set out within the:
- London Borough of Hillingdon: Local Plan: Part 1 – Strategic Policies (Adopted 2012)
  - London Borough of Hillingdon: Local Plan: Part 2 – Site Allocations and Designations (Proposed Submission Version, September 2014)
  - London Borough of Hillingdon: Employment Land Review Update 2014
  - Planning and Retail Statement, prepared by GVA, October 2014

#### Parameters for comparable sites

- 3.2.4 The above documents identify a number of sites for development, but for the purposes of this assessment we have excluded anything which has not been allocated for employment/commercial purposes. The reason for this is that if a site in Flood Zone 1 is allocated for

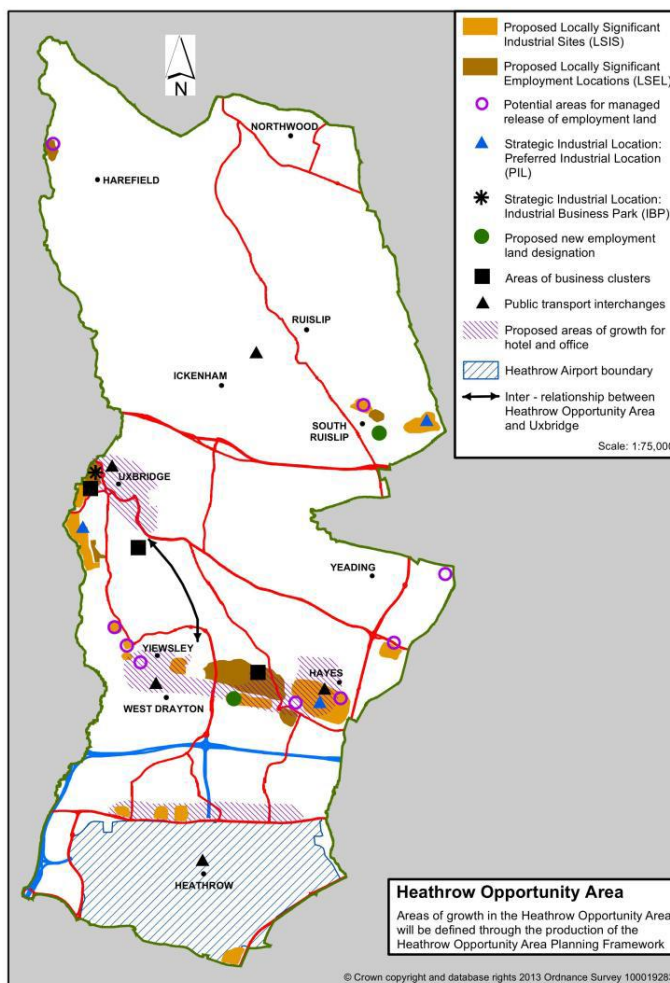


residential uses for example, whilst it would be a sequential preferable site in flood risk terms, it still cannot be considered as a reasonable available alternative site; proposals for an alternative land use would be contrary to planning policy and the site specific allocation, and any application submitted proposing an alternative use would more than likely be refused. This would particularly be the case for residential sites; the NPPF seeks to significantly boost the supply of housing and the London Borough of Hillingdon outlines how the loss of existing residential properties and land would be resisted.

3.2.5 The starting point for the assessment has therefore been those employment sites which are considered suitable for release for alternative uses; those sites which are not considered suitable for release and are to be retained for employment uses cannot be considered as reasonably available alternatives as proposals for retail use would be contrary to planning policy.

3.2.6 The plan below identifies some of the location of sites considered suitable for release for alternative uses (circled in purple).

Figure 2.1 – Employment sites considered suitable for release



3.2.7 In addition to the existing/proposed use of the site, it would also only be appropriate to consider sites as sequentially preferable which are between 0.32 and 1.62 hectares in size, and therefore comparable with the Lidl site.

- 3.2.8 This is to ensure that the sites being assessed are comparable to that of the application site and would ultimately be capable of providing the type and character of development which is similar to the application scheme. For a site to be an actual alternative to the application site there needs to be a comparison of like with like.
- 3.2.9 The scale of the proposed Lidl store is a commercial requirement derived from the market that the proposed store is intended to serve. In this instance, the commercial view of the retailer is that if the scale of the store was materially reduced, it would compromise the ability of the store to provide the quantity and range of goods generally expected at a discount retail foodstore.
- 3.2.10 For example, a foodstore on a much smaller town centre commercial site cannot be considered as an alternative to the scheme proposed simply because the proposed store floorspace is the same; the nature and product of the development would be entirely different; high density, and perhaps without the possibility of sufficient dedicated customer car parking space.
- 3.2.11 This approach is consistent with the Planning Practice Guidance which notes that when applying the sequential test, “*a pragmatic approach on the availability of alternatives should be taken*”.
- 3.2.12 The sites that have been considered in this assessment therefore fit within the following criteria:
- Allocated/identified for commercial/employment use; and
  - Site size of between 0.32ha and 1.62ha.

## Task 2 – Flood Zone Identification

- 3.2.13 The second task is to establish which flood zone the sites to be assessed are located in and therefore whether they are sequentially preferable. A review of the Environment Agency’s Flood Map for Planning has been used to confirm which parts of the respective sites are in which flood zone.
- 3.2.14 As the application site is located in Flood Zone 2 this sequential test excludes sites in Flood Zone 2 and 3 as they are not sequentially preferable. The assessment therefore includes sites in Flood Zone 1 only.

## Task 3 – Site Assessment

- 3.2.15 The third task is to carry out a desk-based assessment, from publically available information, of whether the sites identified are ‘*reasonably available*’. This assessment considers the following:
- When is the site available for development?
  - Is the site currently occupied/in use?
  - Are there multiple ownerships?
  - Is compilation of several plots of land needed?

- Has there been any planning activity (a review of the planning history)?
- Is the site being pursued by other third parties?
- Are there any known development constraints?

3.2.16 Answering these questions will determine whether or not a site is a reasonably available alternative in comparison to the application site which is available for development now.

### **3.3 London Borough of Hillingdon Employment Land Requirements**

- 3.3.1 Before considering individual sites, it is important to understand the overall employment/commercial land provision in the Borough with regard to the safeguarding of employment land from redevelopment for alternative uses; it provides an important context for the consideration of proposed commercial developments.
- 3.3.2 The NPPF, published in March 2012, states at paragraph 157 that development plans should “allocate sites to promote development and flexible use of land...” With specific regard to employment sites, it states that “planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose” (paragraph 22). It emphasises the need to review land allocations regularly to ensure that if there sites allocated for employment use with no reasonable prospect they should be considered for alternative uses.
- 3.3.3 The Council's Employment Land Study (ELS) (2009), which forms part of the evidence base for the Local Plan, confirms that Hillingdon has an existing surplus of 19.7ha. This represents an oversupply of approximately 7.1%. The study concludes that Hillingdon could release around 8.9ha of land in the period of 2009 – 2016, with a further 6.9ha between 2017–2026/7 whilst still maintaining an effective employment base.
- 3.3.4 This stance is supported by the GLA's recent report on Industrial Land Demand and Release Benchmarks in London (December 2011), undertaken by Roger Tym and Partners. The study assessed the projected level of demand for industrial land across London boroughs between 2011 and 2037. For Hillingdon, the study found a significant lack of demand for both industrial (-53.6ha) and warehousing (-9.8ha) uses with limited demand for waste treatment uses (6.2ha). Further, in addition to an 8.8ha surplus of vacant employment land in the Borough, the study found that there was (negative) demand for -66ha of industrial floorspace in Hillingdon, the second largest surplus in London.
- 3.3.5 It is therefore considered that there is sufficient evidence to conclude that there is no demand for industrial uses in the proposed location of the Lidl store or, indeed, the wider area. The site has never been in traditional employment uses and it is clear that the ‘release’ of the site for alternative development will not harm the employment land supply. In any case it is extremely important to take advantage of all available previously developed sites and ensure that they are being used in the most efficient way.
- 3.3.6 Please refer to the Planning and Retail Statement for further detail on the release of this site from industrial uses.

### **3.4 Findings of the Sequential Test**

- 3.4.1 We have carried out a Borough-wide search that considers sites included in the London Borough of Hillingdon that are able to provide a plot between 0.32ha and 1.62ha, are allocated for retail/commercial/employment use, and are suitable for providing a foodstore development. Some 17 sites in total have been considered in detail, and from this it is possible to conclude that there is no reasonably available alternative site in a lower flood risk zone to accommodate the application proposals.
- 3.4.2 Appendix 1 to this report sets out the sequential analysis.

## 4 Summary and Conclusions

- 4.1.1 This Sequential Assessment has been prepared by Peter Brett Associates on behalf of Lidl UK in relation to flood risk, for the proposed development of a 1,286 sq. m (net sales) Lidl foodstore and associated works on the site of the former Imperial Garage.
- 4.1.2 The site is located in Flood Zone 2 and therefore planning policy requires a sequential test to be undertaken to establish whether there are any reasonably available alternative sites. We have therefore undertaken an assessment of sites located in Flood Zone 1, and which are capable of providing a plot between 0.32ha and 1.62ha.
- 4.1.3 The assessment has demonstrated that there are no sequentially preferable sites within the London Borough of Hillingdon that are reasonably available alternatives to the development site. On this basis, it is considered that the Sequential Test has been satisfied.

# Appendix A Sequential Test Assessment Table

PBA Ref	Source	Site Address	Planning Application Ref	Current Land Use	Site Area (ha)	Flood Zone	Availability	Suitability	Alternative Site?	Comment
1	Planning and Retail Statement	Eagle Point, The Runway, Ruislip, HA4 6SE	N/A	Industrial Use	circa. 0.205	1	N	N	N	<p>Eagle Point comprises five modern, fitted office suites available to let. There are currently no existing tenants. The site is currently in B1 uses and comprises 583 sq. m over two floors. Two prior approval applications for residential conversion of the building were recently withdrawn. Although the site is being actively marketed by David &amp; Charles, discussions with the agent have confirmed that the site owner (s) intends to pursue residential development through the prior approval process. The site is therefore not considered reasonably available.</p> <p>Further, as well as not being reasonably available, it would not be feasible to reconfigure the existing layout of the building to provide a suitable trading format and the site is significantly below the required amount of floorspace to deliver on the aims of Lidl as a discount foodstore. The site is unable to accommodate a new foodstore and is therefore not considered a suitable alternative to the development site.</p>
2.	Planning and Retail Statement	Astral House, The Runway	N/A	Vacant Offices	0.175	1	Y	N	N	<p>Astral House is a vacant office building situated on The Runway within South Ruislip Local Centre. The site is approximately 0.175 ha and comprises a vacant modern office building providing circa 971 sq. m over two floors. It is understood that Ladbroke's recently vacated the premises following a short term lease. The property is currently being marketed for freehold/leasehold opportunities.</p> <p>The site, whilst it is available, sits outside of the parameters of this sequential assessment in terms of site size and is subsequently not a comparable alternative to the proposed development site at Victoria Road. Further, the existing building does not provide the required floorspace and the overall site area is not able to accommodate the parking and access requirements to accommodate the proposed Lidl discount foodstore, it is therefore not a suitable alternative.</p>
3	Planning and Retail Statement	Vacant Public House, Village Way East, Rayners Lane	Unknown	Vacant Public House	0.307	1	N	N	N	<p>The site comprises a vacant public house which consists of circa 600 sq. m floorspace of ground floor and car parking set across a 0.307ha site. However, the public house forms part of the wider application known as Carmine Court. Planning Permission was granted for 31 flats and retention and refurbishment of the public house. Work started on site in March 2013 and is currently on-going.</p> <p>Accordingly, the site is not considered a reasonably suitable or available alternative and is subsequently not a sequentially preferable site.</p>
4	Planning and Retail Statement	Bovis House, 142 Northolt Road	Ref No: P/2573/13	Offices	0.584	1	N	N	N	<p>Bovis House is a six storey building previously in office use comprising 7,580 sq. m across a site of 0.584ha. The existing configuration of floorspace would not be suitable for the proposed Lidl foodstore, however it is appreciated that the site is large enough to accommodate the proposed scheme.</p> <p>It should also be noted that an application for prior approval (P/2573/13) was granted for the conversion of offices (Class B1a) to 101 self-contained flats (Class C3) on 9<sup>th</sup> October 2013. It is understood that the freehold purchase of the site from Lend Lease took place in April 2014. It is also understood that site hoarding is in place which indicates that works are now taking place on site.</p>

										The site is therefore not considered a reasonably suitable or available alternative and is therefore not a sequentially preferable.
5	Planning and Retail Statement	152 – 158 Northolt Road	Ref No: P/1490/14	Offices	0.261	1	N	N	N	152-158 Northolt Road comprises a 5 storey building previously in office use with 21 car parking spaces across a site of 0.261ha. The existing configuration of floorspace would not be suitable, and further the site is also not large enough to accommodate the proposed scheme and sits outside of the parameters of this sequential assessment and in this regard is therefore not a comparable alternative.  Further, an application for prior approval (Ref No: P/1490/14) was granted for the conversion of offices (Class B1a) to 53 self-contained flats (Class C3) on 30 <sup>th</sup> May 2014. It is therefore considered that the site is being actively pursued by third parties and is subsequently not reasonably available.
6	Planning and Retail Statement	Arla Dairy Site	Ref No: 66819/APP/2014/1600		5.56	1	N	N	N	It is understood that there is a current application for mixed use redevelopment of the former Arla Dairy site behind Victoria Road and Long Drive in South Ruislip. The application seeks full permission for a 7,131 sq. m Asda store with ancillary café, 11 screen multiplex cinema, five restaurant units totalling 2,027 sq. m and 132 residential units and is currently pending determination (Ref: 66819/APP/2014/1600).  Accordingly, as Asda is attached to the proposal it is considered highly unlikely that the site, or indeed part of the site would be made available to Lidl for a new foodstore. In addition, given the fact the landowner is promoting the site for a large foodstore the subsequent land values would make the acquisition of all or part of the site unviable for a discount retailer such as Lidl. The site is therefore not considered reasonably available.  In addition the application site is some 5.56ha and is significantly larger than the current Lidl Proposal at Victoria Road. The site sits outside of the parameters of this sequential test and is therefore not a comparable or suitable alternative development site.
7	Planning and Retail Statement	Units A & B, 428A Victoria Road	Ref No: 4445/APP/2013/1050	Vacant retail units	1.67	1	N	Y	N	Units A and B of 428 Victoria Road are currently vacant. Both units are restricted to the sale of bulky goods only. Unit 1 is 2,918 sq. m, which is significantly larger than the current proposal. Unit 2 on the other hand is 941 sq. m and therefore too small to accommodate the proposed Lidl store.  An application for planning permission to vary the sale of goods that can be sold from these units is currently being determined by LB Hillingdon. The application documentation references B&M Bargains and Aldi as the main operators subject to planning permission being granted. Accordingly, it is considered that the site is therefore be actively pursued by third parties and is therefore not reasonably available.
8	Planning and Retail Statement	Unit 3, Victoria Retail Park	Ref No: 43510/APP/2012/3176	Retail	0.18 plus a share of 0.54ha car park	1	N	N	N	Unit 3 of Ruislip Park was previously considered as part of the applications previous assessment, however it is no longer considered available as TK Maxx are currently trading in the unit. Therefore it is no longer considered an available alternative to the development site.
9	Local Plan Part 1 and 2, Employment	Part of Summerhouse Lane/ Royal	N/A	Industrial	Release of 1ha of land.	1	N	N	N	The Local Plan Part 2: Site Allocations and Designations (Proposed Submission Version, September 2014) indicates that the Council proposes to redraw the boundaries of the existing Industrial Business Areas (IBA) to exclude the already



	Land Study Update 2014	Quay/Salamander Quay, Harefield							<p>completed housing component in the north of the IBA, release the vacant part of Royal Quay to housing and include Salamander Quay as a designated Locally Significant Employment Location (LSEL).</p> <p>The Employment Land Study Update 2014 indicates there is 1ha of vacant industrial land for release. However, as the Local Plan Part 2 indicates that this land is to be released for residential development, it is considered that the site is not reasonably available and the redevelopment of this site with a foodstore would be against policy guidance. Further the ELS Update notes that the Summerhouse Lane site has inadequate road access and as such the redevelopment with a foodstore may exaggerate such concerns.</p> <p>Additionally, the Employment Land review 2009 at Appendix G notes that the site is located in the north of the borough adjacent to the Grand Union Canal, Green Belt, a Nature Conservation Site of Metropolitan Importance Grade 1 and a conservation area.</p> <p>It is therefore considered that the site is not a reasonably available or suitable alternative to the proposed development site at Victoria Road.</p>	
10	Local Plan Part 1 and 2	Cape Boards site, Iver Lane, Cowley (part of the Uxbridge Industrial Estate)		Vacant Industrial Units	Circa. 12.5	1	N	N	N	<p>The site is located on the boundary with Buckinghamshire between the River Colne to the west, with Green Belt beyond and the Grand Union Canal to the east. To the north is the Uxbridge Industrial Estate and to the south an area of low density rural style housing located within the Green Belt.</p> <p>It is appreciated that the site is sequentially preferable in flood risk terms. The Local Plan Part 2: Site Allocations and Designations (Proposed Submission Version, September 2014) notes that the former Cape Boards site has remained vacant for a subject to decontamination works and is considered suitable to be release for residential-led mixed use development.</p> <p>The ELS Update 2014 notes that the site is currently being promoted for release to non-industrial uses, notably residential uses. As a result it is considered that the site is being actively pursued by third parties and is therefore not reasonably available.</p> <p>In addition the application site is some 12.5ha and is significantly larger than the current Lidl proposal at Victoria Road. The site sits outside of the parameters of this sequential test and is therefore not a comparable or suitable alternative development site.</p> <p>It is therefore considered that the site is not a reasonably available or a suitable alternative to the proposed development site at Victoria Road.</p>
11	Local Plan Part 1 and Employment Land Study Update 2014	Trout Road area, Yiewsley		Temporary Car Park	Release of 0.72ha	3	N	N	N	<p>The site is dissected north to south by the Grand Union Canal, a Nature Conservation Site of Metropolitan Importance. To the west is the Green Belt. To the north is the Cowley retail Park.</p> <p>The site is located in flood zone 3 and as a result it cannot be considered sequentially preferable.</p>

12	Local Plan Part 1	Warwick Road/ Kingston Lane Area, West Drayton	Ref No: 45658/APP/2002/3012	Residential	-	1	N	N	N	<p>The site is located to the east of West Drayton, the area was a specialist employment area associated with the defence sections which has subsequently been in a state of decline.</p> <p>The site has been subject to significant residential redevelopment and it is therefore now not considered available.</p>
13	Local Plan Part 1 and 2	Blyth Road Area, Printing House Lane, Hayes	Ref No: 59872/APP/2012/1838	Industrial	6.6	1	N	N	N	<p>The site is a traditional industrial area which has been undergone a significant transformation, moving away from manufacturing to distribution, support services and offices uses. The site is dissected by the Grand Union Canal, a nature conversation site of Metropolitan Importance.</p> <p>The site has outline planning permission for mixed use development of the Old Vinyl Factory site, including the demolition of up to 12,643 sq. m of buildings and construction of up to 112,953sq. m of new floorspace. Uses to include up to 510 residential units, up to 7,886 sq. m of new B1 floorspace, up to 4,000 sq. m of A class uses, up to 4,700sq. m of D1 and D2 uses, an energy centre, car parking with up to 1,640 spaces, works to access and creation of new accesses and landscaping.</p> <p>It is therefore considered that the site is being actively pursued by third parties and is subsequently not reasonably available. In addition the size of the site sits outside of the parameters of this sequential assessment and it is subsequently not a comparable alternative to the proposed development site.</p>
14	Local Plan Part 1	Hayes Bridge Area	-	Industrial	0.87	1	N	N	N	<p>The site is currently occupied by Shurgard Self-Storage and as a result it is not considered reasonably available. Further the existing configuration of floorspace would not be suitable for the proposed Lidl foodstore, however it is appreciated that the site is large enough to accommodate the proposed scheme.</p> <p>This site is therefore not considered a suitable or available alternative to the proposed development site.</p>
15	Employment Land Study Update 2014	Millington Road	Ref No: 32157/APP/2011/872	Industrial	Release of 4ha	1	N	N	N	<p>Planning permission has been granted on this site to provide mixed use development comprising an industrial/ warehouse unit and a retail store.</p> <p>From a review of the application documentation it appears that Asda are the lead retail store for the site. Accordingly, as Asda is attached to the proposal it is considered highly unlikely that the site, or indeed part of the site would be made available to Lidl for a new foodstore. In addition, given the fact the landowner is promoting the site for a large foodstore the subsequent land values would make the acquisition of all or part of the site unviable for a discount retailer such as Lidl. Accordingly the site is therefore not considered reasonably available.</p> <p>In addition the application site is some 5.56ha and is significantly larger than the current Lidl proposal at Victoria Road. The site sits outside of the parameters of this sequential test and is therefore not a comparable or suitable alternative development site.</p>
16	Employment Land Study Update 2014	The Old Coal Depot, Tavistock	Ref No: 18736/APP/2013/1784	Waste Facility	Release of 2.3ha	1	N	N	N	<p>The ELS Update 2014 indicated that Tavistock Road is an undesignated cluster close to West Drayton town centre. It has high vacancy levels, signs of recent release to residential uses and mainly poor quality buildings.</p>

		Road, Yiewsley								<p>Whilst the site has been identified in the ELS Update 2014, the site has not been identified for release as part of the Local Plan Part 2: Site Allocations and Designations (Proposed Submission Version, September 2014). Accordingly redevelopment of the site with alternative uses would be contrary to policy guidance. It is therefore not considered an available alternative.</p> <p>Further, the site was granted planning permission in 2013 for the redevelopment of the site to provide a materials recovery facility and Civic Amenity Site, incorporating a recovery and recycling building, storage bays, administrative office/training building, external processing and storage area, two weighbridges, reuse and extension of railway sidings, and Civic Amenity Centre, together with associated car parking, landscaping, fencing and infrastructure. The site cannot therefore be considered available for alternative development.</p> <p>In addition, the site sits outside the parameters of this sequential assessment, in respect to site size. It is therefore considered that a foodstore on this site would result in a different type of development to that proposed at Victoria Road. The site is therefore not a comparable alternative.</p>
17	Employment Land Study Update 2014	Princes Way	N/A	Industrial	Release of 1.8ha	2	N	N	N	<p>The site sits outside the parameters of this sequential assessment in respect to site size and it is therefore considered that a foodstore on this site would result in a different type of development to that proposed at Victoria Road. The site is therefore not a comparable alternative.</p> <p>In addition, the site is located in flood zone 2 and as a result it cannot be considered sequentially preferable.</p>