

S O U T H A L L
W A T E R S I D E

Planning Statement
Switchroom Application
May 2017

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1 Introduction

Introduction

- 1.1 This Planning Statement has been prepared by Deloitte Real Estate on behalf of St James West London (SJWL) ("the applicant"). It supports a planning application submitted to the London Borough of Hillingdon (LBH) for full planning permission for the siting of an electricity switchroom.
- 1.2 The switchroom is required in association with the new Western Access road which will serve the Southall Waterside development (the former Southall Gasworks site). The switchroom will provide the required power for lighting, signals and illuminated signage for the Western Access and is a critical part of the necessary infrastructure. The Southall Waterside development was initially consented under planning permissions P/2008/3981-S and 54814/APP/2009/430 on the 29 September 2010.
- 1.3 The proposed location of the switchroom is an area of land to the south of Pump Lane as it crosses under the A312. The application red edge measures 123 sqm and is located in the LBH.
- 1.4 The purpose of this statement is to demonstrate that the proposed switchroom is in accordance with the LBH Development Plan. The statement is structured as follows:
 - Section 2 – Site Context
 - Section 3 - The Proposals
 - Section 4 – Relevant Planning History
 - Section 5 – Planning Policy Compliance
 - Section 6 – Summary and Conclusions

Planning Submission Documents

- 1.5 A full list of documents that comprise or support this planning application is set out below.
 - Planning application form;
 - Site location plan;
 - Existing site plan;
 - Landscaping plan and details;
 - Proposed elevations;
 - Planning Statement; and
 - Ecological Assessment.

2 Site context

Site location

- 2.1 The location of the proposed switchroom lies within the wider Southall Waterside development site.
- 2.2 Southall Waterside is primarily situated in the London Borough of Ealing (LBE). However, the western part of the site (to the west of the Grand Union Canal) is within LBH. It is bordered by Beaconsfield Road to the north, The Straight and the London to Cardiff mainline railway to the southeast and Grand Union Canal and A312 to the west.
- 2.3 As shown on the plan attached at Appendix 1, it is proposed to locate the switchroom on an 123 sqm area of land to the south of Pump Lane as it crosses under the A312 The Parkway (the Site). The Site is located in the LBH.
- 2.4 The Site is a vegetated area of land which is part of the Pump Lane highway verge.
- 2.5 To the west of the Site is a 2.5m palisade fence which is the boundary of the adjoining aggregate works. The bridge supports to the A312 also fall to the west of the Site.
- 2.6 The proposed area of land is to be cleared as part of the highway works approved under planning consent 54814/APP/2009/430.

3 Planning history

- 3.1 As set out in Section 2, the area of land subject to this application lies within the wider Southall Waterside development. This section provides an overview of the key planning applications associated with the Southall Waterside development.

Southall Waterside

- 3.2 Planning applications P/2008/3981-S and 54814/APP/2009/430 were submitted by National Grid Property Limited to the LBE and LBH respectively on 9 October 2008. Both Local Authorities determined to refuse the applications.
- 3.3 The London Mayor resolved to grant planning permission on 25 March 2010 subject to the prior completion of a Section 106 Agreement. The Section 106 Agreement was signed on 29 September 2010 and planning permission was granted on the same day.
- 3.4 Further to the approval of planning permission 54814/APP/2009/430 in 2010, there has been just one planning application of relevance to the site. This was a "*Non-material amendment to rectify incorrect drawing references to LB Hillingdon conditions 2, 9 and 11*", which had the reference 54814/APP/2013/3372 and was approved on 10 December 2013.

4 Pre-application consultation

- 4.1 Consultation was carried out with both LBH and Transport for London (TfL) prior to the submission of this application. The discussion, summarised below, helped shape the form of the proposals and application.

London Borough of Hillingdon

- 4.2 Consultation with the LBH provided an opportunity for the proposals, including their need and location, to be introduced.
- 4.3 It was confirmed by the agent that whilst the proposed switchroom will be located within the greenbelt, this is acceptable under planning policy as it is classed as essential infrastructure for the Western Access highway. It was confirmed by LBH that its location within the greenbelt would mean that the application will need to be heard at Planning Committee, and it would fall under the minor applications category.
- 4.4 During consultation with LBH, it was also confirmed that the list of application documents were sufficient for the application, and no additional documentation was required.

Transport for London

- 4.5 Consultation with TfL provided an opportunity to confirm the need and location of the switchroom. The role of the new switchroom in providing power to the Western Access for necessary infrastructure, such as lighting, was also confirmed.
- 4.6 Further, more in-depth, discussions have also been completed with TfL. These included the matter of a sewer pipe located below the proposed switchroom, and how disruption to this can be prevented.

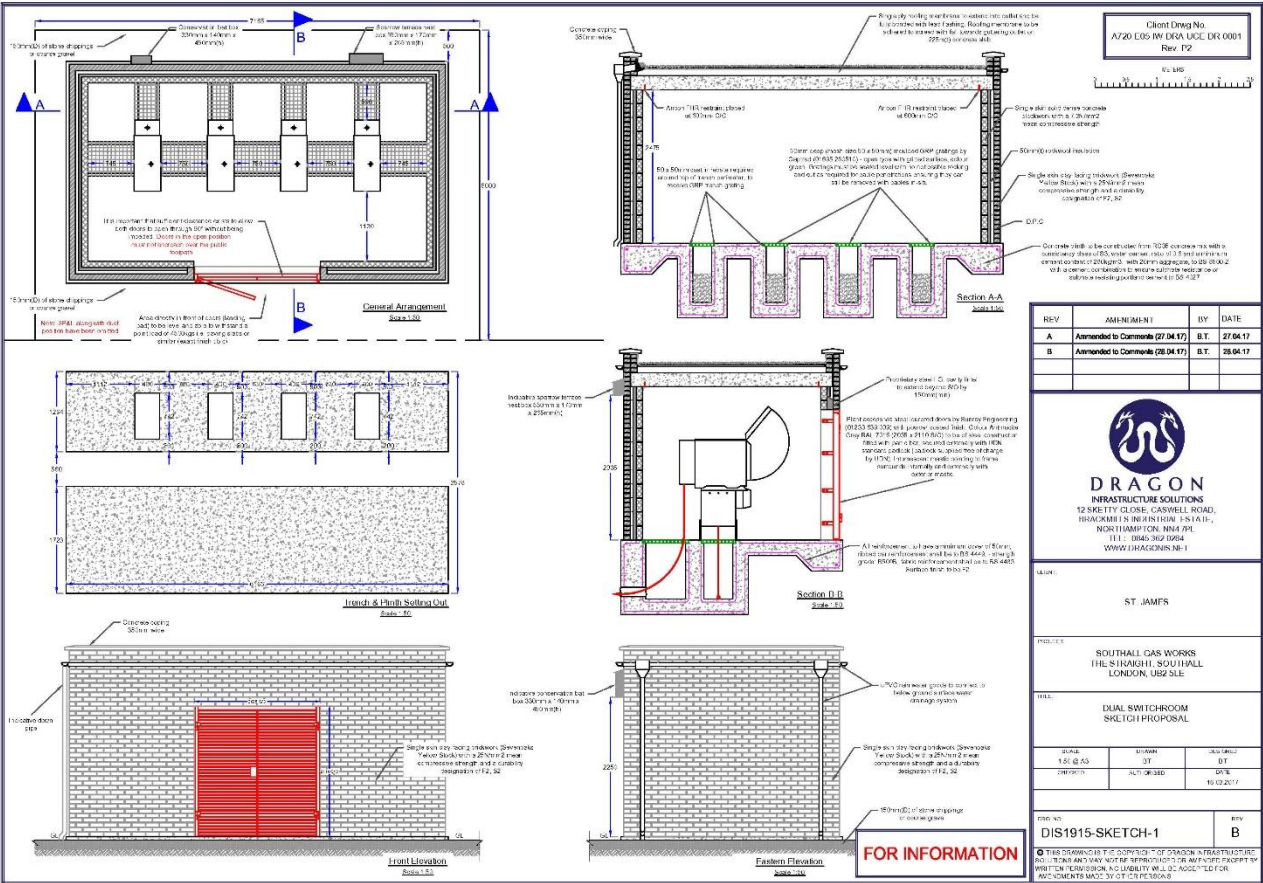
5 The proposals

5.1 As set out in section 1, it is proposed to erect an electricity switchroom in association with the new Western Access to the Southall Gasworks regeneration site. This section provides details of the proposed development with regard to its design and access to the facility.

Design

5.2 It is proposed that the switchroom is surrounded by gravel as shown on the Planting Plan (drawing reference A720-EO5-IW-HED-LS-DR-0011) attached as Appendix 2.

5.3 The switchroom is 3.6m x 6.2m in size. The immediate area surrounding the switchroom will feature gravel, and the wider area will feature various plants. Please see the submitted Planting Plan for more details.



(Figure 1: Elevations)

5.4 As shown on the elevations the proposed switchroom is some 3.0m in height to the top of the coping. The roof is flat.

5.5 It is proposed that the switchroom is constructed from Sevenoaks Yellow Stock bricks and will be yellow in colour. The proposed doors are to be steel and louvred.

Access

- 5.6 The switchroom is to be located in an area which currently forms part of the Pump Lane highway verge. This area of land has been cleared as part of the Western Access works permitted under planning permission 54814/APP/2009/430.
- 5.7 The facility will not be publicly accessible and entry will be prohibited except for authorised personnel. The relevant statutory notices will be affixed to the doors of the switchroom to deter unauthorised entry.
- 5.8 The switchroom has been located in proximity to the public highway to ensure that 24 hour access can be provided to the statutory authority.

6 Planning policy context

Introduction

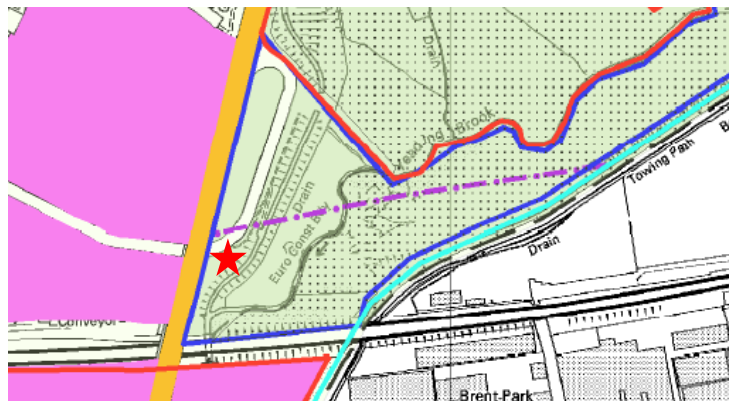
- 6.1 This Section sets out planning policies that are relevant to the proposed switchroom.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.

Statutory Development Plan

- 6.3 Within LBH, the relevant Statutory Development Plan documents are:
- London Plan (2016)
 - Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
 - Saved Unitary Development Plan Policies (2007)
 - The West London Waste Plan
- 6.4 The National Planning Policy Framework (NPPF, March 2012), the Planning Practice Guidance (PPG) and regional and local level Supplementary Planning Documents are material considerations.

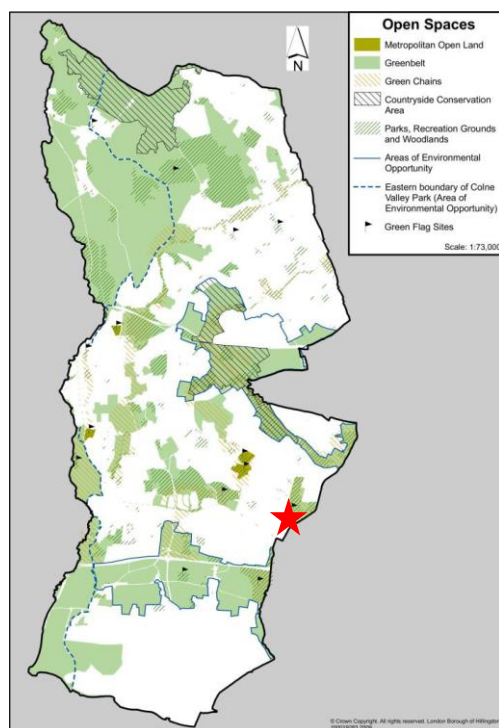
Site Specific Policy Designations

- 6.5 The proposed switchroom is located entirely within LBH and the following planning policy designations apply on the site (as shown on the LBH UDP Proposals Map – Figure 2):
- Green Belt.



(Figure 2: Extract of LBH UDP Proposals Map with Site Location shown)

- 6.6 Map 8.1 of the LBH Local Plan Part 1 outlines that the Site is located within a Green Chain.



(Figure 3: Local Plan Part 1 Map 8.1 – Open Spaces)

Key Planning Considerations

6.7 Based on a review of the above LBH Development Plan policies, the subsequent sections of this report assess the key planning considerations relevant to the proposed switchroom. These are considered to be:

- Green Belt and Green Chain; and
- Ecology/Biology.

Green Belt and Green Chain

National Planning Policy Framework

6.8 Section 9 of the NPPF confirms the importance of the Green Belt. Paragraph 81 advises that:

"Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to damaged and derelict land."

6.9 The Paragraph 87 states:

"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'Very Special Circumstances'."

6.10 Paragraph 88 goes onto state:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."

6.11 Those uses not considered to be inappropriate are defined in Paragraph 89. Paragraph 90 confirms other forms of development considered “appropriate” in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. These are:

- *“Mineral extraction;*
- *Engineering operations;*
- ***Local transport infrastructure which can demonstrate a requirement for a Green Belt location;***
- *The re-use of buildings provided that the buildings are of a permanent and substantial construction; and*
- *Development brought forward under a Community Right to Build Order.” (our emphasis)*

London Plan

6.12 In March 2016, the Mayor adopted an updated version of the London Plan entitled – the London Plan (The Spatial Development Strategy for London consolidated with alterations since 2011).

6.13 Policy 7.16 Green Belt confirms *“the strongest protection should be given to London’s Green Belt, in accordance with National Guidance. Inappropriate development should be refused, except in Very Special Circumstances.”*

Hillingdon Local Plan

6.14 The London Borough of Hillingdon adopted its Local Plan Part 1 – Strategic Policies in 2012.

6.15 Strategic Policy EM2: Green Belt, Metropolitan Open Land and Green Chains confirms that *“any proposals for development in Green Belt and Metropolitan Open Land will be assessed against National and London Plan policies, including Very Special Circumstances.”*

6.16 It goes onto state *“any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break up in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.”*

6.17 Policy AM4 of the Local Plan states that *“the local planning authority will not grant planning permission for development which would prejudice the implementation of safeguarded road proposals. The following schemes are shown on the proposals map: (i) Hayes By-Pass, Link to Former Gas Works, Southall.”*

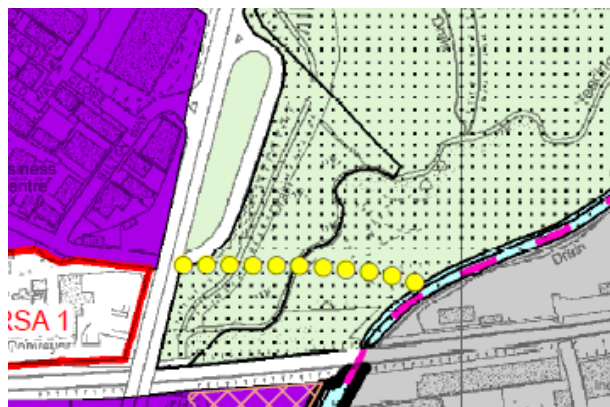
Assessment against Policy

6.18 The proposed switchroom lies within land allocated as Green Belt where development is inappropriate, save for those uses identified within Paragraphs 89 and 90 of the NPPF.

6.19 Paragraph 90 states that “local transport infrastructure” is not considered to be inappropriate development provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land within the Green Belt.

6.20 Planning approval for the Western Access was granted on the 29 September 2010. The road alignment is safeguarded in the adopted Local Plan and the emerging Local Plan Part 2, as shown on Figure 4. Local Plan Policy AM4 seeks to prevent any development which will prejudice the implementation of the Western Access. The location of the proposed switchroom falls within the land identified within the Road Safeguarding and is to be delivered in association within the highway works. In particular,

the switchroom will deliver essential power for the delivery of road lighting and junction control on the Western Access. The switchroom is therefore considered to be local transport infrastructure in accordance with paragraph 90 of the NPPF and Policy AM4 of the Local Plan.



(Figure 4: Extract of draft Policies Map North Sheet, Local Plan Part 2)

- 6.21 The proposed location of the switchroom is on the fringe of the Green Belt adjoining the A312 and Pump Lane and currently serves as verge adjoining the highway. It is a single storey de minimis structure.
- 6.22 As the switchroom is a single storey de minimis structure it is considered that development in this piece of land will not impact on the openness of the Green Belt or conflict with the "purpose of including land within the Green Belt."

Biodiversity

NPPF

- 6.23 Paragraph 109 sets out that the planning system should contribute to and enhance the natural environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible.

London Plan

- 6.24 The site is located nearby to a Nature Conservation Site of Metropolitan or Borough Grade I Importance.
- 6.25 Policy 7.19 '*Biodiversity and access to nature*' states that "*C. Development Proposal should: a) wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.*"
- 6.26 Policy 7.21 '*Trees and woodlands*' states that "*existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.*"

Hillingdon Local Plan: Part 1 – Strategic Policies

- 6.27 Strategic Objective 8 of the Local Plan states that development should "*protect and enhance biodiversity to support the necessary changes to adapt to climate change.*"
- 6.28 Policy EM7 outlines that Hillingdon's biodiversity conservation will be preserved and enhanced with particular attention to the protection and enhancement of all Sites of Importance for Nature Conservation.

Hillingdon Unitary Development Plan Saved Policies

- 6.29 Policy EC1 states that LBH will not permit development that would be unacceptably detrimental to Sites of Metropolitan or Borough (Grade I) importance for nature conservation, designated local nature reserves and other reserves. If development is proposed on or in the near vicinity of such sites, applicants must submit an ecological assessment to demonstrate that the proposed development will not have unacceptable ecological effects.

Assessment against Policy

- 6.30 The siting of the switchroom has been carefully considered to ensure it is located largely in an area of open verge with reduced tree cover. Vegetation on the application site included field maple and several other young specimens such as sycamore '*Acer pseudoplatanus*' and wild cherry '*Prunus avium*'. These were confirmed to be of little significance by the tree surveyor, and were cleared as part of clearance work for the Southall Waterside development in February 2017. In accordance with Strategic Policy EM2 of the LBH Local Plan it is not considered that the visual amenity value of this space will be detrimentally affected by the proposals.
- 6.31 The ecological assessment (as required by Policy EC1) submitted with this application has confirmed that impacts on ecological features as a result of the proposed development relate to the loss of habitats from the site already undertaken during the initial clearance for the wider Southall Waterside development. Prior to this clearance it was confirmed that no nesting birds or other protected species were present.
- 6.32 Of some mention in the ecological assessment is the impact of dust, run-off and noise during the construction process. In view of this, commitments have been made to ecological mitigation and enhancement, including appropriate timing of work, an appropriate CEMP, appropriate planting and in-built bird and bat boxes. These measures have been to ensure a reduced impact to the nearby Nature Conservation Site of Metropolitan or Borough Grade I Importance, and are therefore in line with Policy EM7.
- 6.33 By undertaking the remaining work in accordance with the mitigation and enhancement measures outlined in the ecological assessment, it is considered that no significant residual effects on ecological features will occur, meaning the proposed development will adhere to planning policy, as well as legislation relating to ecology.

7 Summary and conclusion

7.1 This Planning Statement is submitted in support of a planning application for:

"Construction of new switchroom to enable operation of Western Access road to Southall Gasworks site"

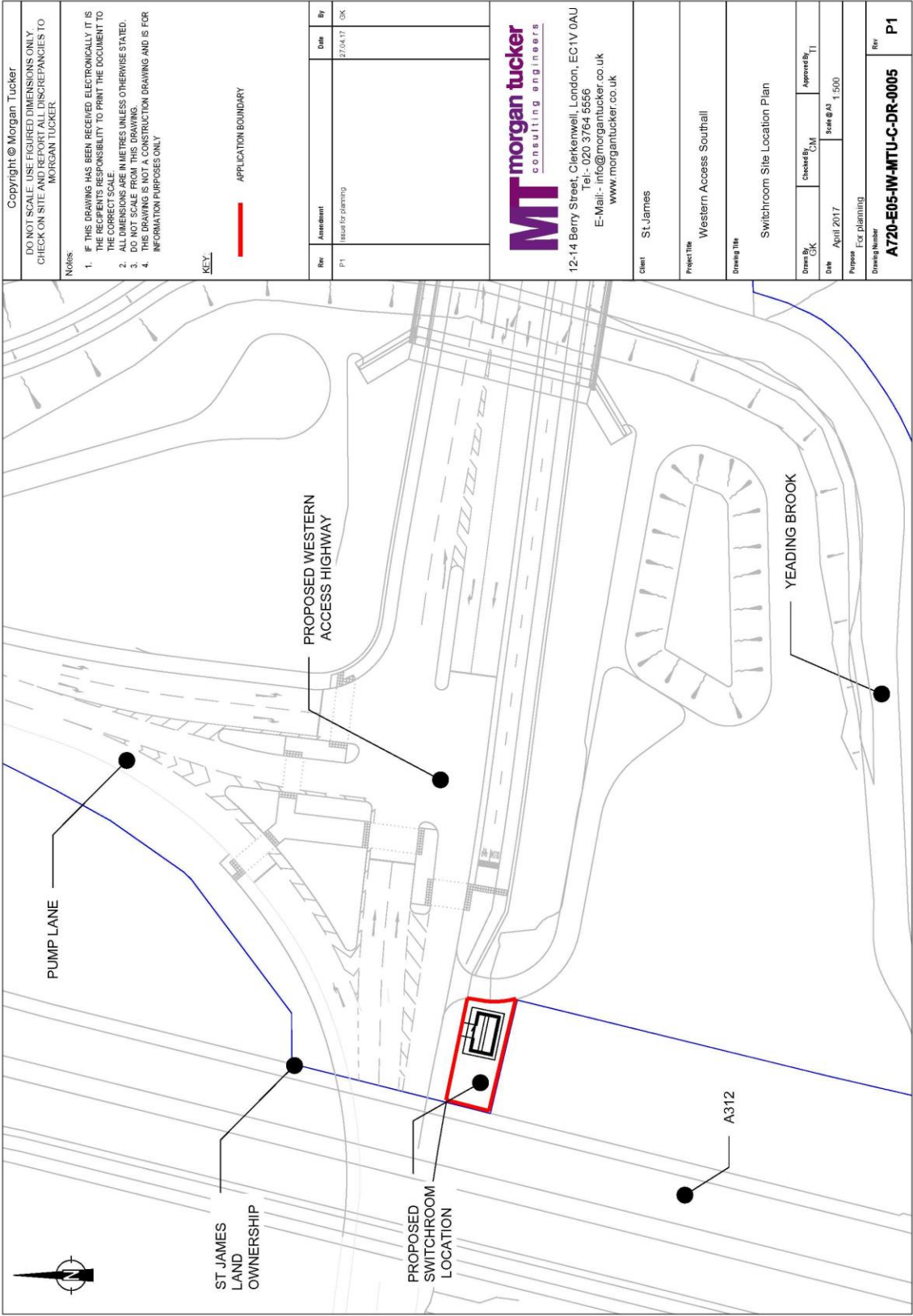
7.2 The proposed new switchroom will provide the required power for lighting, signals and illuminated signage for the new Western Access road. This new road is necessary for the Southall Waterside development (the former Southall Gasworks site), and forms part of an existing planning consent (54814/APP/2009/430).

7.3 The setting and location of the switchroom has been carefully considered to ensure a reduced impact on the site and surrounding area. In doing so, the proposal's impact on ecological and arboricultural impacts have also been reduced.

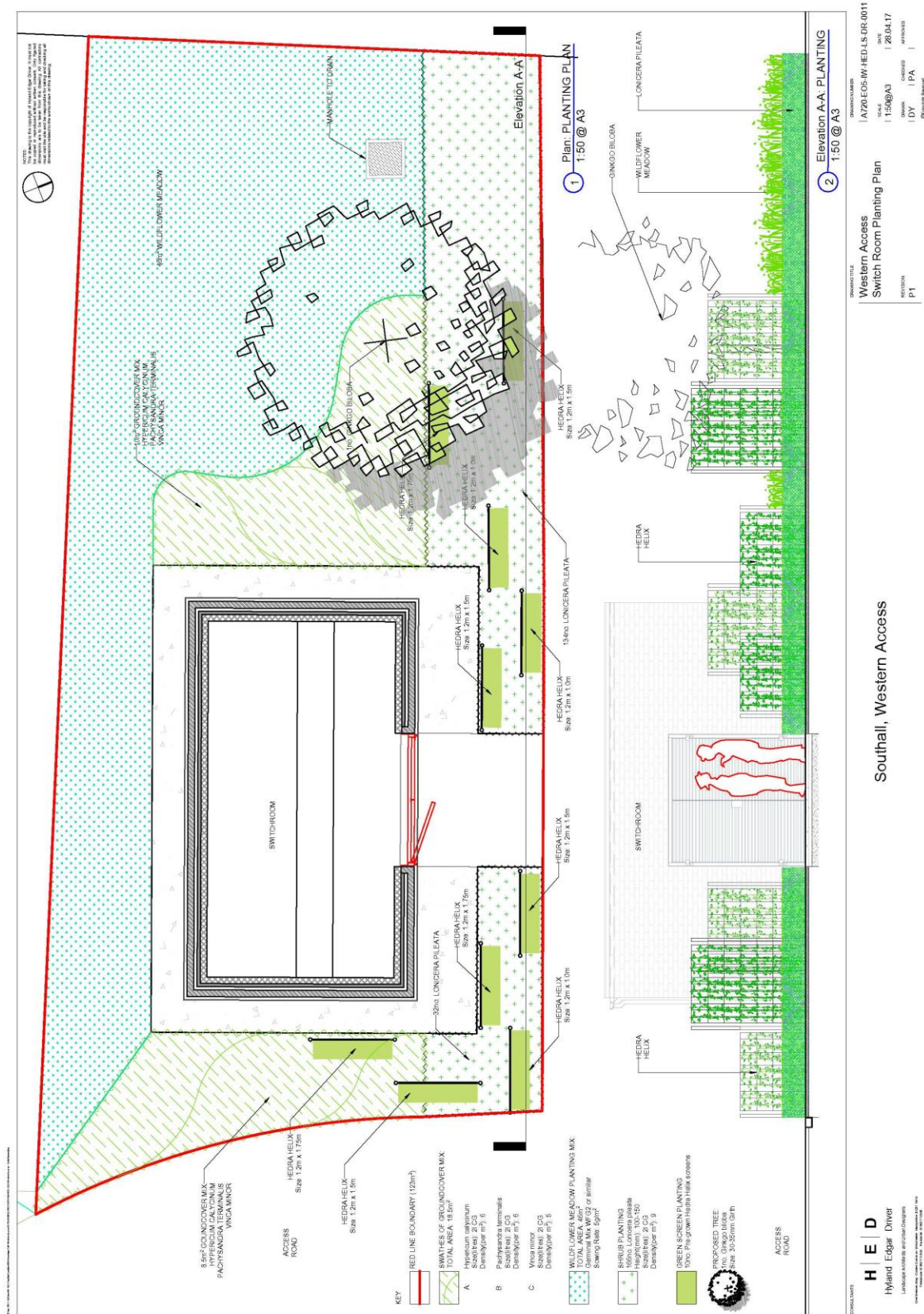
7.4 Particular attention has been given to this ecological impact and, as required by relevant planning policy, an ecological assessment has been submitted with this application. Within this assessment are a series of suggested mitigation and enhancement methods, which will be implemented to ensure a minimised impact and the proposal's adherence with planning policy.

7.5 In summary, the proposed switchroom is of a high quality design which is sympathetic to its setting, forms part of necessary infrastructure, and is compliant with national, regional and local policy.

Appendix 1



Appendix 2





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