PROGRESS PLANNING

Planning Statement

217 High Street, Yiewsley, West Drayton, UB7 7GN

Erection of 5 and 6 storey buildings to provide a D1 Health Facility (approximately 10,000sqft) and 235 residential apartments with associated parking, communal podium garden, landscaping, pedestrian and cycle canal link and external works following the demolition of the existing buildings.

Prepared by Progress Planning on behalf of:

Taylor Wimpey – West London

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Executive Summary

1.1 Taylor Wimpey have instructed Progress Planning to prepare this statement which is being submitted in support of the planning application for erection of 5 and 6 storey buildings to provide a D1 Health Facility (approximately 10,000sqft) and 235 residential apartments with associated parking, communal podium garden, landscaping, pedestrian and cycle canal link and external works following the demolition of the existing buildings at 217 High Street, Yiewsley.

1.2 This application follows extensive pre-application engagement with Hillingdon Council and the Greater London Authority. Pre-application discussions on the project started in May 2019 with the first formal pre-application with Hillingdon Council. The development sites comprised only 82% of the existing site at this time, as only the land with the B&M store had been secured by the applicant. The Council advised that the land to the rear occupied by the MOT testing and repair shop should be included in any scheme which would enable a more comprehensive development of the site to come forward. This advice was followed, and a subsequent pre-application scheme was prepared and submitted covering the area of the existing site in June 2019. The Council welcomed the assembly of both parcels of land and the principle of delivering a residential led redevelopment and provision of a health facility to serve Yiewsley/West Drayton. The scheme has evolved significantly through the advice given by Hillingdon and the support for the scheme shown by the GLA. The accompanying Design and Access Statement prepared by Assael Architecture sets out the evolution of the scheme though the pre-application process and how the current scheme addresses design and its setting.

1.3 In terms of principle of development, there is Local and London Plan support for making more efficient use of sustainable, underutilised brownfield edge of town centre sites within Opportunity Areas for the delivery of housing, including affordable housing. This proposal would also incorporate a D1 Health Facility which would provide crucial community services that meet the needs of the local community and its growing population.

1.4 This proposal seeks to provide 80 residential units (244 habitable rooms) as affordable which equates to 38% of the total scheme, compliant with local policy and meets the eligibility for the Mayor of London's fast track planning process which seeks to increase the delivery of affordable homes in London. 51 London Affordable Rent units (159 habitable rooms) are proposed which complies with Hillingdon's tenure split of 70/30 as a proportion of their affordable housing policy.

1.5 The design of the scheme draws inspiration from the character/heritage of the local area and Grand Union Canal and delivers genuine improvements to the streetscape and general character of the area through provision of modern, sensitively designed buildings, similar to new developments in the area, such as Drayton Wharf, Padcroft Works, and 2-24 Horton Road. The scheme enables a green link incorporating a cycle route to be provided between the existing Celandine Route along the River Pinn and the Grand Union Canal to the West of the site and Colne River Valley. Furthermore, it is envisaged that a contribution will be provided to extend the cycle improvements along the Grand Union Canal towpath that links up with West Drayton Crossrail Station.

1.6 The proposed development benefits from having no immediate neighbouring residential properties that would be affected by the forthcoming scheme in terms of residential amenity.

Whereas, future occupiers will benefit from a high standard of residential amenity in terms of unit size, quality, and access to amenities such communal gardens and access to improved links to local parks and the Grand Union Canal.

1.7 Taylor Wimpey hosted a public consultation exhibition on Tuesday 3rd December 2019, for the general public to come and view the proposals, speak with members of the team and provide feedback. There was widespread support for the scheme voiced by those who attended and specifically many noted that the delivery of the health facility was particularly needed in Yiewsley/West Drayton and would be welcomed. Please refer to the Statement of Community Involvement prepared by BECG that accompanies this submission.

1.8 Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of Council's Local Plan.

The Site

2.1 The 1.2ha largely rectangular site comprises a retail warehouse of approximately 30,000 sq.ft of floor space over one level with associated car parking and delivery access and parcel of land to the rear backing onto the Grand Union Canal that is in use as MOT Testing and repair shop. It is situated on the West side of the High Street, Yiewsley, approximately 200m North of Yiewsley/West Drayton Town Centre. Located within the London Borough of Hillingdon, the site is situated North of West Drayton Railway Station which is a Crossrail Station, soon to be part of the forthcoming Elizabeth Line. Yiewsley/West Drayton along with Hayes form part of a designated Opportunity Area whereby there is an ambition to deliver over 10,000 new homes in the next several years.

2.2 The site is bound by the River Pinn to the North with large scaled light industrial/commercial further beyond it. Opposite the High Street to the site there is Hillingdon Manor Grange and a Barn at Philpotts Yard which are Grade II Listed Buildings and there are a number of residential properties between it and the parkland beyond to the East. To the South, there is a range of different property types, characterised mainly by large footprints such as the Tesco store and adjoining residential block. Farther South is Yiewsley/West Drayton Town Centre and West Drayton Crossrail Station.

2.3 The application site is not designated in the Council's Local Plan. It has a PTAL rating of 3 and is only an 8-13 minute walk from West Drayton Crossrail Station and is abutting Yiewsley Town Centre with the amenities available on its doorstep. The site is located in the Hayes / Yiewsley Growth Corridor and Heathrow Opportunity Area.

The site is located in Flood Zone 2 with some limited encroachment of Flood Zone 3 along its northern boundary with the River Pinn.

Proposed development

3.1 The proposal is for erection of 5 and 6 storey buildings to provide a D1 Health Facility (approximately 10,000sqft) and 235 residential apartments with associated parking, communal podium garden, landscaping, pedestrian and cycle canal link and external works following the demolition of the existing buildings at 217 High Street, Yiewsley.

Planning Policy

4.1 The proposed development would be assessed against the Development Plan Policies contained within Hillingdon's Local Plan: Part 1 & 2, the London Plan, the emerging London Plan, the NPPF and supplementary planning guidance by both the London Borough of Hillingdon and GLA.

National Policy

National Planning Policy Framework

4.2 The National Planning Policy Framework (NPPF) under paragraph 11 states decisions should apply a presumption in favour of sustainable development and 11(c) stipulates that for decision taking this means approving development proposals that accord with an up to date development plan without delay.

4.3 Paragraph 38 stipulates that local planning authorities should approach decisions on proposed development in a positive and creative way. Decision-makers at every level should seek to approve applications for sustainable development where possible.

4.4 Chapter 5 of the NPPF refers to 'Delivering a sufficient supply of homes'. Paragraph 59 states that to support the Government's objective of significantly boosting the supply of homes, 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.

4.5 Chapter 8 of the NPPF refers to 'Promoting healthy and safe communities'. Paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for each pedestrian and cycle connection within and between neighbourhoods, and active street frontages;
b) Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and
c) Enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking cycling.

4.6 Paragraph 92 states to provide the social, recreational and cultural facilities and services the community needs, planning polices, and decisions should:

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public

houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

4.7 Paragraph 96 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

4.8 Paragraph 98 states that decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks.

4.9 Chapter 9 of the NPPF refers to 'Promoting sustainable transport'. Paragraph 103 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan- making and decision making.

4.10 Within this context, paragraph 110 states that applications for development should:

a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
d) Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

4.11 Paragraph 111 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

4.12 Chapter 11 of the NPPF refers to 'Making effective use of land'. Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

4.13 Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

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, attractive and healthy places.
f) Paragraph 123 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:
g) The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
h) Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
i) Chapter 12 of the NPPF refers to 'Achieving well-designed places'. Paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspects of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
j) Paragraph 127 states that planning policies and decisions should ensure that developments:
k) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
l) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
m) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
n) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
o) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
p) Create places that are safe, inclusive and accessible and which promote health and well being, with a high standard of amenity for existing and future users; and where

crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.14 Paragraph 131 states that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

4.15 Chapter 14 of the NPPF refers to 'Meeting the challenge of climate change, flooding and coastal change'. Paragraph 150 states that new development should be planned for in ways that:

a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
b) Can help to reduce green house gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

4.16 Paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

4.17 Paragraph 158 states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.

4.18 Paragraph 159 states that if it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

4.19 Paragraph 163 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
b) The development is appropriately flood resistant and resilient;
c) It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
d) Any residual risk can be safely managed; and

e) Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

4.20 Chapter 15 of the NPPF refers to 'Conserving and enhancing the natural environment' and paragraph 170 states that decisions should contribute to and enhance the natural and local environment.

4.21 Chapter 16 of the NPPF refers to ' Conserving and enhancing the historic environment'. Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

4.22 Paragraph 192 states that in determining applications, local planning authorities should take account of:

a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
c) The desirability of new development making a positive contribution to local character and distinctiveness.

4.23 Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

4.24 Paragraph 200 states that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Regional Policy

London Plan

5.1 Policy 2.13 Opportunity Areas and Intensification Areas states:

Development proposals within opportunity areas and intensification areas should:

a) Support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks
b) Seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses
c) Contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks
d) Realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking
e) Support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.

5.2 Policy 2.18 Green infrastructure: the multi-functional network of green and open spaces states:

Development proposals should incorporate appropriate elements of green infrastructure that are integrated into the wider network

5.3 Policy 3.1 Ensuring Equal Life Chances for All states:

Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities.

5.4 Policy 3.2 Improving Health and Addressing Health Inequalities states:

New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

5.5 Policy 3.3 Increasing Housing Supply states:

The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.

5.6 Policy 3.4 Optimising Housing Potential states:

That taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location.

5.7 Policy 3.5 Quality and design of housing developments states:

The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and

relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.

5.8 Policy 3.6 Children and young people's play and informal recreation facilities states:

Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation sets out guidance to assist in this process.

5.9 Policy 3.7 Large Residential Developments states:

Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility.

5.10 Policy 3.8 Housing choice states:

Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

5.11 Policy 3.11 Affordable Housing Targets states:

The Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing

5.12 Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes states:

The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.

5.13 Policy 3.16 Protection and Enhancement of Social Infrastructure states:

Development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments.

5.14 Policy 3.17 Health and Social Care Facilities states:

Development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking.

5.15 Policy 5.2 Minimising carbon dioxide emissions states:

Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy

- Be lean: use less energy
- Be lean: supply energy efficiency
- Be green: use renewable energy

5.16 Policy 5.3 Sustainable design and construction states:

The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

5.17 Policy 5.7 Renewable energy states:

The mayor seeks to increase the proportion of energy generated from renewable sources, and expects that the projections for installed renewable energy capacity outlined in the Climate Change Mitigation and Energy Strategy and in supplementary planning guidance will be achieved in London.

5.18 Policy 5.8 Innovative energy technologies states:

The Mayor Supports and encourages the more widespread use of innovative energy technologies to reduce use of fossil fuels and carbon dioxide emissions.

5.19 Policy 5.9 Overheating and cooling states:

Major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy.

5.20 Policy 5.10 Urban Greening states:

Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.

5.21 Policy 5.11 Green roofs and development site environs states:

Major development proposals should be designed to include roof, wall and site planting, especially green roofs and wall where feasible, to deliver as many of the following objectives as possible:

a) Adaptation to climate change (ie aiding cooling)
b) Sustainable urban drainage
c) Mitigation of climate change (ie aiding energy efficiency)
d) Enhancement of biodiversity
e) Accessible roofspace

f) Improvements to appearance and resilience of the building g) Growing food
Policy 5.12 Flood risk management states:

5.22 Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 and Catchment Flood Management Plans.

5.23 Policy 5.12 Flood Risk Management states:

Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 (TE2100 – see paragraph 5.55) and Catchment Flood Management Plans.

5.24 Policy 5.13 Sustainable Drainage states:

Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water runoff is managed as close to its source as possible in line with the following drainage hierarchy:

- Store rainwater for later use
- Use infiltration techniques, such as porous surfaces in non-clay areas
- Attenuate rainwater in ponds or open water features for gradual release
- Attenuate rainwater by storing in tanks or sealed water features for gradual release
- Discharge rainwater direct to a watercourse
- Discharge rainwater to a surface water sewer/drain
- Discharge rainwater to the combined sewer
- Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.

5.25 Policy 5.21 Contaminated land states:

The Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use.

5.26 Policy 6.2 Providing Public Transport Capacity and Safeguarding Land for Transport states:

The Mayor will work with strategic partners to co-ordinate measures to ensure that the transport network, now and the future, is as safe and secure as reasonably practicable.

5.27 Policy 6.3 Assessing effects of development on transport capacity states:

Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

5.28 Policy 6.9 Cycling states:

Developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards.

5.29 Policy 6.10 Walking states:

The Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasizing the quality of the pedestrian and street environment, including the use of shared space principles, - promoting simplified streetscape, decluttering and access for all.

Development proposals should ensure high quality pedestrian environments and emphasis the quality of the pedestrian and street space by referring to Transport for London's Pedestrian Design Guidance.

5.30 Policy 6.13 Parking states:

The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

5.31 Policy 7.1 Lifetime neighbourhoods states:

Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport.

Development should enable people to live healthy, active lives; should maximise the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods.

The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.

5.32 Policy 7.2 An inclusive environment states:

The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:

- Can be used safely, easily and with dignity by all regardless of disability, age, gender ethnicity or economic circumstances
- Are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment
- Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways
- Are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all

5.33 Policy 7.3 Designing out crime states:

Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. Policy 7.4 Local character states:

Buildings, streets and open spaces should provide a high quality design response that:

- Has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- Contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- Is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- Allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- Is informed by the surrounding historic environment

5.34 Policy 7.5 Public realm states:

London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street, furniture and surfaces.

Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.

5.35 Policy 7.6 Architecture states:

Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

5.36 Policy 7.8 Heritage Assets and Archaeology states:

Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

5.37 Policy 7.13 Safety, security and resilience to Emergency states:

Development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help defer its effects.

5.38 Policy 7.14 Improving air quality states:

The Mayor recognises the importance of tackling air pollution and improving air quality to London's development and the health and well being of its people. He will work with strategic partners to ensure that the spatial, climate change, transport and design policies of this plan support implementation of his Air Quality and Transport strategies to achieve reduction in pollutant emissions and minimise public exposure to pollution.

5.39 Policy 7.15 Reducing and managing noise, improving and enhancing the acoustics environment and promoting appropriate soundscapes states:

- Development proposals should seek to manage noise by:
- Avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- Mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;
- Improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- Separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation;

Where it is not possible to achieve separation of noise sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustics design principles.

Having particular regard to the impact of aviation noise on noise sensitive development

Promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

5.40 Policy 7.18 Protecting open space and addressing deficiency states:

The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.

5.41 Policy 7.19 Biodiversity and Access to Nature states that development proposals should:

a) Wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
b) Prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites
c) Not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

5.42 Policy 7.21 Trees and Woodlands states:

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.

5.43 Policy 7.24 Blue Ribbon Network states:

The Blue Ribbon Network is a strategically important series of linked spaces. It should contribute to the overall quality and sustainability of London by prioritizing uses of the waterspace and land alongside it safely for water related purposes, in particular for passenger and freight transport. Regard should be paid to the Thames River Basin Management Plan and the emerging marine planning regime and the Marine Policy Statement.

5.44 Policy 7.25 Increasing the use of the Blue Ribbon Network for Passengers and Tourism states that developments proposals:

a) Should protect existing facilities for waterborne passenger and tourist traffic. Applications which remove existing facilities should be refused unless suitable replacement facilities are provided
b) Which provide new facilities for passenger and tourist traffic, especially on the central London stretch of the River Thames will be supported
c) Which provide improved facilities for cruise ships in London will be supported.

5.45 Policy 7.27 Blue Ribbon Network: Supporting Infrastructure and Recreational Use states that development proposals should enhance the use of the Blue Ribbon Network, in particular proposals:

a) That result in the loss of existing facilities for waterborne sport and leisure should be refused, unless suitable replacement facilities are provided
b) Should protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths). New access infrastructure into and alongside the Blue Ribbon Network will be sought.
c) Should protect and enhance waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc. New infrastructure to support water dependent uses will be sought. New mooring facilities should normally be off line from main navigation routes, ie in basins or docks.

5.46 Policy 7.30 London's Canals and Other Rivers and Waterspaces states:

Development proposals along London's canal network and other rivers and waterspace (such as reservoirs, lakes and ponds) should respect their local character and contribute to their accessibility and active water related uses, in particular transport uses, where these are possible.

Emerging London Plan

6.1 Policy GG1 Building strong and inclusive communities states that delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspace in accessible locations, and social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.

6.2 To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

- provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.
- ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.
- ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.

6.3 Policy GG2 Making the best use of land states that London's population is set to grow from 8.9 million today to around 10.8 million by 2041.

Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks. Integrating land use and transport in this way is essential not

only to achieving the Mayor's target for 80 per cent of all journeys to be made by walking, cycling and public transport, but also to creating vibrant and active places and ensuring a compact and well-functioning city.

All options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London. New and enhanced transport links will play an important role in allowing this to happen, unlocking homes and jobs growth in new areas and ensuring that new developments are not planned around car use.

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

- prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.
- proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach.
- understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.

6.4 Policy GG3 Creating a healthy city states that to improve Londoners' health and reduce health inequalities, those involved in planning and development must:

- ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.
- promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.
- use the Healthy Streets Approach to prioritise health in all planning decisions.
- plan for improved access to green spaces and the provision of new green infrastructure.

6.5 Policy GG4 Delivering the homes Londoners need states that to create a housing market that works better for all Londoners, those involved in planning and development must:

- ensure that more homes are delivered.
- support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.
- create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.
- establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

6.6 Chapter 2 of the emerging London Plan gives a strategic framework for those parts of London that will see significant development over the lifetime of the Plan. The areas that will see the most significant change are identified as Opportunity Areas. Many of these Opportunity Areas are already seeing significant development, and they all have the potential to deliver a substantial amount of the new homes and jobs that London needs. The London Plan has a clear focus on delivery – something that will require all stakeholders to work together to unlock sites and drive the right sort of development. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

6.7 Policy SD1 Opportunity Areas states that to ensure Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:

- ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities
- ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration

6.8 Boroughs, through Development Plans and decisions, should:

- clearly set out how they will encourage and deliver the growth potential of Opportunity Areas
- support development which creates employment opportunities and housing choice for Londoners
- plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary
- recognise that larger areas can define their own character and density
- meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12
- include ambitious transport mode share targets
- support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration

6.9 The Heathrow Opportunity Area forms part of the Elizabeth Line West area which is identified to deliver 13,000 homes. The area contains a range of opportunities to support London's economic development and deliver new housing and environmental improvements.

6.10 Chapter 3 Design of the emerging London Plan contains the following relevant policies:

Policy D1 London's form and characteristics
Policy D2 Delivering good design
Policy D3 Inclusive design
Policy D4 Housing quality and standards
Policy D5 Accessible housing
Policy D6 Optimising housing density

Policy D7 Public realm
Policy D10 Safety, security and resilience to emergency
Policy D11 Fire safety
Policy D12 Agent of Change
Policy D13 Noise

6.11 Policy D6 Optimising housing density states that development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1. the site context
2. its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3. the capacity of surrounding infrastructure.

6.12 Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

6.13 The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth.

1. The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels.
2. The ability to support proposed densities through encouraging active travel should be taken into account.
3. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly.

6.14 The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management. Development proposals with a residential component that are preferable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above:

1. 110 units per hectare in areas of PTAL 0 to 1; or
2. 240 units per hectare in areas of PTAL 2 to 3; or
3. 405 units per hectare in areas of PTAL 4 to 6.

6.15 The following measures of density should be provided for all planning applications that include new residential units:

1. number of units per hectare
2. number of habitable rooms per hectare
3. number or bedrooms per hectare
4. number of bedspaces per hectare.

6.16 The following additional measures should be provided for all major planning applications:

5. the Floor Area Ratio (total Gross External Area of all floors / site area)
6. the Site Coverage Ratio (Gross External Area of ground floors /site area)
7. the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).

These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.

6.17 Chapter 4 Housing of the emerging London Plan contains the following relevant policies:

Policy H1 Increasing housing supply
Policy H5 Delivering affordable housing
Policy H6 Threshold approach to applications
Policy H7 Affordable housing tenure
Policy H12 Housing size mix

6.18 Policy H6 Threshold approach to applications states that affordable housing is initially set at:

1. a minimum of 35 per cent
2. 50 per cent for public sector land
3. 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance.

6.19 To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

1. meet or exceed the relevant threshold level of affordable housing on site without public subsidy
2. be consistent with the relevant tenure split (Policy H7 Affordable housing tenure)
3. meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
4. demonstrate that they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent.

Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).

6.20 Policy H7 Affordable housing tenure states that the Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

1. a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)
2. a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership
3. 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability.

6.21 Policy S2 Health and social care facilities of the emerging London Plan states that boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes
3. regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues
4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision
5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

New facilities should be easily accessible by public transport, cycling and walking.

6.22 Policy S4 Play and informal recreation of the emerging London Plan states development proposals for schemes that are likely to be used by children and young people should:

1. increase opportunities for play and informal recreation and enable children and young people to be independently mobile
2. for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:
    a. provides a stimulating environment
    b. can be accessed safely from the street by children and young people independently
    c. forms an integral part of the surrounding neighbourhood
    d. incorporates trees and/or other forms of greenery.
3. incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
4. for large-scale public realm developments, incorporate incidental play space to make the space more playable
5. not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

6.23 Policy E4 Land for industry, logistics and services to support London's economic function of the emerging London Plan states that:

London's land and premises for industry, logistics and services falls into three categories:

1. Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)
2. Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites
3. non-Designated Industrial Sites - see below.

The retention and provision of industrial capacity across the three categories of industrial land should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

The retention and provision of additional industrial capacity should be prioritised in locations that:

1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population

3. provide capacity for micro, small and medium-sized enterprises
4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision.

Any release of industrial capacity in line with above should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

6.24 Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function of the emerging London Plan states that

Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:

1. there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
2. it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or
3. industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or
4. suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development. Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out below.

1. the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing
2. the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
3. the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied
4. appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:
    a. safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)
    b. the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and mitigating transport impacts)
    c. design quality, public realm, visual impact and amenity for residents (see Policy D1 London's form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5

Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall buildings)

d. vibration and noise (see Policy D13 Noise)
e. air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).

6.25 Chapter 7 Heritage and Culture of the emerging London Plan contains policy HC1 Heritage conservation and growth which states:

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

6.26 Chapter 8 Green Infrastructure and Natural Environment of the emerging London Plan contains the following relevant policies:

Policy G1 Green infrastructure
Policy G4 Local green and open space
Policy G5 Urban greening
Policy G6 Biodiversity and access to nature
Policy G7 Trees and woodlands

Policy G5 Urban greening states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

6.27 Chapter 9 Sustainable Infrastructure of the emerging London Plan contains the following relevant policies:

Policy SI1 Improving air quality
Policy SI2 Minimising greenhouse gas emissions
Policy SI4 Managing heat risk
Policy SI5 Water infrastructure
Policy SI7 Reducing waste and supporting the circular economy

Policy SI12 Flood risk management
Policy SI13 Sustainable drainage
Policy SI14 Waterways – strategic role
Policy SI16 Waterways – use and enjoyment
Policy SI17 Protecting London's waterways

6.28 Chapter 10 Transport of the emerging London Plan contains the following relevant policies:

Policy T2 Healthy streets
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
Policy T6.5 Non-residential disabled persons parking

Policy T6.1 Residential parking states that new residential development should not exceed the maximum parking standards set out in Table 10.3.

All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking.

Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must as a minimum ensure that at least one designated disabled persons parking bay per dwelling for 3% of dwellings is available from the outset.

As a minimum demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as designated disabled persons parking in the future. If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future.

Policy T6.5 Non-residential disabled persons parking states that all non-residential elements of a development should provide at least one on or off-street disabled persons parking bay.

Disabled persons parking should be provided in accordance with the levels set out in Table 10.6.

6.29 Chapter 11 Funding the London Plan refers to enabling infrastructure and specifically the need for Health Facilities. It states that the demand for health services in London is increasing due to a growing and ageing population and an increase in complex and long-term health conditions. As described in paragraphs 5.2.1 to 5.2.9 of the Plan, the NHS has set out the need to undertake a higher proportion of healthcare in community rather than hospital settings. However, many hospital sites contain old, poor-quality stock and there is a need for both

replacement and maintenance. Investment is also needed in the workforce and digital technology to deliver service change.

Across London, developer contributions are used to fund the capital costs of new or expanded primary and community care facilities in order to meet the increasing demand for services which arises from population growth in new developments. Boroughs should use the London Healthy Urban Development Unit Planning Contributions Model (HUDU Model) to calculate the capital cost of the additional health facilities required to meet the increased demand. Boroughs should also work with Clinical Commissioning Groups and NHS England to determine what investment is required by monitoring housing and population growth, keeping infrastructure plans up to date and working together to identify and develop projects towards which Section 106 and CIL contributions could be used.

Section 106 in-kind contributions can be used to support the provision of new health facilities, particularly in Opportunity Areas where there is little or no existing infrastructure. Examples of in-kind contributions include: transfer of land to provide new primary and community care facilities; construction and fit-out of new health facilities; and provision of 'shell and core' space at peppercorn rent. Funding sources for health buildings also include direct capital from central government and private funding through a variety of public/ private joint ventures. A specific fund for Primary care estate, the Estates and Technology Transformation Fund (ETTF) is in the second of a four-year programme (to 2020).

London's Sustainability and Transformation Plans (STPs) were published in October 2016 to set out how health and care services would evolve and become financially sustainable over the 5-year period to 2020/21. The plans outlined a requirement to spend £4.8 billion on existing health infrastructure in London just to keep it operationally functional. Further capital investment in NHS infrastructure of £2.1 billion is needed to meet the costs of transforming health services in London and accommodating population growth. Therefore, a total 5-year investment of £6.9 billion is required.

ETTF and developer contributions represent only a relatively small proportion of the capital funding required, so additional sources need to be identified. The London Health and Care Devolution Memorandum of Understanding offers significant opportunities to address health and care estate challenges. These include innovative approaches to realising value from underused and unused NHS land and buildings; working more collaboratively with the Mayor and London's boroughs; and taking the One Public Estate approach to health and care developments. The London Estates Board and London Estates Delivery Unit aim to support the effective delivery of local and sub-regional estates plans, including more efficient estate utilisation. This will better meet the health and care needs of Londoners now and in the future.

Housing SPG

Affordable Housing and Viability SPG

Accessible London SPG

Plan and Informal SPG

Local Policies

Hillingdon Local Plan

7.1 The Local Plan Part 1 - Strategic policies sets out the overall level and broad locations of growth up to 2026. Together with the Local Plan Part 2 Development Management Policies and Site Allocations and Designation documents it forms the Council's future development strategy for the borough.

7.2 The Local Plan Part 1 – Strategic policies contains the following relevant policies:

Policy E1: Managing the Supply of Employment Land
Policy E3: Strategy for Heathrow Opportunity Area
Policy H1: Housing Growth
Policy H2: Affordable Housing
Policy HE1: Built Environment
Policy EM1: Climate Change Adaptation and Mitigation
Policy EM2: Green Belt, Metropolitan Open Land and Green Chains
Policy EM3: Blue Ribbon Network
Policy EM4: Open Space and Informal Recreation
Policy EM6: Flood Risk Management
Policy EM7: Biodiversity, and Geological Conservation
Policy EM8: Land, Water, Air and Noise
Policy T1: Accessible Local Destinations
Policy T5: Crossrail
Policy CI1: Community Infrastructure Provision

7.3 The Local Plan Part 2 – Development Management Policies contains the following relevant policies:

DME2 Employment Uses Outside of Designated Sites
DMH2 Housing Mix
DMH7 Provision of Affordable Housing

DMHB1 Heritage Assets
DMHB 2 Listed Buildings
DMHB7 Archaeological Priority Areas and Archaeological Priority Zones
DMHB11 Design of New Development
DMHB12 Streets and Public Realm
DMHB14 Trees and Landscaping
DMHB15 Planning for Safer Places
DMHB16 Housing Standards
DMHB17 Residential Density
DMBH18 Private Outdoor Amenity Space
DMHB19 Play Space

DMEI1 Living Walls and Roofs and Onsite Vegetation
DMEI2 Reducing Carbon Emissions
DMEI7 Biodiversity Protection and Enhancement
DMEI8 Waterside Development
DMEI9 Management of Flood Risk
DMEI10 Water Management, Efficiency and Quality
DMEI14 Air Quality

DMCI2 New Community Infrastructure
DMCI4 Open Spaces in New Development
DMCI5 Children's Play Areas

DMT1 Managing Transport Impacts
DMT2 Highways Impacts
DMT5 Pedestrians and Cyclists
DMT6 Vehicle Parking

Principle of Development

Loss of retail/employment/industrial uses

8.1 The existing site comprises 2 parcels of land. The majority of the site consists of a retail warehouse (B&M stores) with associated car parking measuring 1.01ha and is A1 retail. The plot to the rear is a MOT testing centre and car repair shop measuring 0.23ha. It was considered to be Sui Generis as it did not fall neatly into any particular use class and as MOT testing centres are often considered to be Sui Generis as it does not involve any industrial processes. However, through our several pre-applications with Hillingdon Council, it has been suggested that the land to the rear may have an element of B2 use. If this element of the development site is considered as in industrial use, still only a very small proportion of the overall site (18%) could be considered industrial as the majority of the land is retail (82%).

8.2 In terms of the loss of retail which is the main use of the development site, it is important to note that the site is not located within a Primary or Secondary Shopping Frontage, nor located within a Town Centre. Therefore, it could be defined as an out of town or edge of town retail store. There has been a shift in retailing patterns over recent years with shops on our traditional High Streets notably suffering from a change in shopping patterns, with a shift to online retailing. Large out of town or edge of town centre retail stores such as the one subject to this application have been known for a long time to have an adverse impact on our High Streets drawing shoppers away from them.

8.3 With the dominance of online retailing, these large retail stores are coming under increasing financial pressure and are struggling to compete. The subject store sells low priced convenience goods which generally do not attract shoppers purposely to it as this is often solely the case for higher priced comparison goods sellers. As such, the existing premises offers limited benefits in terms of drawing shoppers to the general area and poses a significant threat to the viability of the nearby Yiewsley District Town Centre. Therefore, its removal is likely to boost the profitability of other retail stores and make a notable difference in the number of vacant units, within the town centre and on designated frontages, in line with adopted policy which seeks to deliver sustainable forms of development. Out of town retail stores in locations of this nature do not benefit from any policy protection. Therefore, there is no in principle concern with the loss of retail. Rather, they are considered as an alternative economic use, driven by the low density of employees.

8.4 Policy DME2 Employment Uses Outside of Designated Sites of the Local Plan Part 2 – Development Management Policies which states that proposal which involve the loss of employment floorspace or land outside of designated areas will normally be permitted if:

i) the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or

ii) the site is unsuitable for employment re-use or development because of its size, shape, location, or suitability of access; or

iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being re-used for employment purposes; or

iv) The new use will not adversely affect the functioning of any adjoining employment land; or

v) The proposed use relates to specific land use allocation or designation identified elsewhere in the plan.

8.5 The proposals will result in the loss of 4,480 sqm of employment floorspace broken down as 3,072.5 sqm of retail floorspace and 1,407.7 sqm related to the MOT testing and repair shop. However, as mentioned above, the retail warehouse is a very low density employment use and currently only employs the equivalent of 25 full time staff. Whereas the much smaller MOT testing and repair shop employs the equivalent of 10 full time staff. Whilst it is acknowledged that the proposal will result in the loss of employment floorspace, the provision of a health facility will offset this loss and re-provide a comparable level of employment. It is anticipated that the health facility would re-provide 25 full time jobs. Therefore, the proposal will have only a small marginally decrease in full time employment by providing a circa 1,000 sqm health facility. In addition, the public benefit of this much needed community health facility in this growth corridor would offset any loss in employment given the small numbers currently employed.

8.6 Nonetheless, the proposal is considered to meet a number of criteria as set out in policy DME2 Employment Uses Outside of Designated Sites of the Local Plan Part 2 – Development Management Policies in that the existing buildings negatively impact on local amenity, through disturbance to the residential properties to the South and by having an adverse impact on the character of the area, as well as the setting of the Grade Listed Buildings opposite. Also, the new health facility and residential development will not adversely affect the functioning of any adjoining employment land which is demonstrated in the accompanying Noise Impact Assessment prepared by Stantec. Therefore, the proposal is considered to meet policy DME2 Employment Uses Outside of Designated Sites of the Local Plan Part 2 – Development Management Policies.

8.7 Whereas local policy prescribes protection for employment, the emerging London Plan refers to the need to protect industrial uses. A small proportion of the site (18%) located along the Grand Union Canal is in use as a MOT testing and repair shop. The exact nature of this land use is considered to be unclear as it does not clearly fall neatly within traditional B use classes. But, Hillingdon Council have stated that without the client ascertaining its lawful use as Sui Generis through a certificate of lawfulness application then they would consider part or all of the rear plot to be industrial as 'industrial processes' occur on-site. This followed pre-application advice by Hillingdon Council to the developer to secure that land and have it included within the development site in order to enable a more comprehensive redevelopment. With this in mind, the following emerging London Plan policies are relevant to loss of industrial despite it constituting a very small element of the overall site and its use being not atypical industrial in nature.

8.8 Policy E4 Land for industry, logistics and services to support London's economic function of the emerging London Plan states that:

London's land and premises for industry, logistics and services falls into three categories:

1. Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)
2. Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites
3. non-Designated Industrial Sites.

8.9 The retention and provision of industrial capacity across the three categories of industrial land should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

8.10 The subject site is not designated for industrial. A small element of the site is considered by the Council to contain an industrial process so therefore is considered to be industrial for the purposes of planning. Policy E4 also states that 'any release of industrial capacity should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure. In this particular case, the site is located along a growth corridor benefiting from the delivery of the Elizabeth Line and is situated within an Opportunity Area. It is well connected by public transport, walking and cycling and will contribute significantly towards providing more housing, particular affordable housing and the proposal will provide a health facility for this growing community.

8.11 Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function of the emerging London Plan states that:

Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where there is no reasonable prospect of the site being used for the industrial and related purposes. Given the bespoke nature and character of the existing subject use, the rear section of the site is unlikely to be brought forward for an industrial or any related use, particularly given its proximity to the residential properties to the South.

8.12 The proposal is considered to comply with policies E4 and E7 of the emerging London Plan, nonetheless, it is recognised that the delivery of a much needed health facility at this site and the public benefits to the local community would outweigh any small loss of industrial.

Delivery of a health facility

9.1 Chapter 8 of the NPPF refers to 'Promoting healthy and safe communities'. Paragraph 92 states to provide the social, recreational and cultural facilities and services the community needs, planning polices, and decisions should plan positively for the provision and use of community facilities and take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

9.2 Policy 3.2 Improving Health and Addressing Health Inequalities of the London Plan states that new developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

9.3 Policy 3.17 Health and Social Care Facilities of the London Plan states that development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking.

9.4 Policy S2 Health and social care facilities of the emerging London Plan states that boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes
3. regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues
4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision
5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

9.5 Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

9.10 Chapter 11 Funding the London Plan refers to enabling infrastructure and specifically the need for Health Facilities. It states that the demand for health services in London is increasing due to a growing and ageing population and an increase in complex and long-term health conditions. The NHS has set out the need to undertake a higher proportion of healthcare in community rather than hospital settings. However, many hospital sites contain old, poor-quality stock and there is a need for both replacement and maintenance. Investment is also needed in the workforce and digital technology to deliver service change.

9.11 Across London, developer contributions are used to fund the capital costs of new or expanded primary and community care facilities in order to meet the increasing demand for services which arises from population growth in new developments. Boroughs should use the London Healthy Urban Development Unit Planning Contributions Model (HUDU Model) to calculate the capital cost of the additional health facilities required to meet the increased demand. Boroughs should also work with Clinical Commissioning Groups and NHS England to determine what investment is required by monitoring housing and population growth, keeping infrastructure plans up to date and working together to identify and develop projects towards which Section 106 and CIL contributions could be used.

9.12 Section 106 in-kind contributions can be used to support the provision of new health facilities, particularly in Opportunity Areas where there is little or no existing infrastructure. The subject site is located within a Growth Corridor and an Opportunity Area and the population has increased significantly and will continue to increase moving forward. There is a clear need for new health facilities in Yiewsley and this development will deliver significant public benefit directly to this growing local community.

9.13 London's Sustainability and Transformation Plans (STPs) were published in October 2016 to set out how health and care services would evolve and become financially sustainable over the 5-year period to 2020/21. The plans outlined a requirement to spend £4.8 billion on existing health infrastructure in London just to keep it operationally functional. Further capital investment in NHS infrastructure of £2.1 billion is needed to meet the costs of transforming health services in London and accommodating population growth. Therefore, a total 5-year investment of £6.9 billion is required. This application will deliver a significant contribution toward capital delivery of health provision to the local community (Yiewsley/West Drayton).

9.14 A letter from Apollo (Primary Care Property Specialists) dated 26th February supports this application and sets out the specific need for this D1 health facility. It states that the NHS in England, as part of the five-year plan are looking to deliver primary care at scale to bring a degree of robustness to the service they deliver. By creating Hubs of over 15k patients, the numbers of GP's, nurses and other health care professionals increase and allow for not only immediate cover in high demand times but also allows the delivery of additional services to patients. The subsequent creation of Primary Care Networks (PCN) creates even larger delivery hubs for between 30k and 50k patients in a particular demography.

9.15 The PCN's are made up of a group of GP practices who work together to deliver health. Quite often a Health Hub will be the focus for PCN enhanced activities such as Physiotherapy, mental health services, same day emergency care and pharmacy advice. The PCN need space to deliver these enhanced services which are essential for the new models of care and to reduce the pressures on the acute services. Yiewsley PCN currently delivers services to almost 37,000 patents from 9 centres. The model becomes far more efficient when the Hub model is adopted to create delivery at scale. In Yiewsley centre there are 3 practices, High Street Practice and Yiewsley Family Practice both operate from the Health Centre and Otterfield Practice operate from a converted house in Otterfield Road. The 2 practices in the Health Centre currently have circa 20,000 while Otterfield have 7200. The town centre practices therefore make up the majority of the PCN seeing circa 27,000 patients. This number is set to rise in the coming years with a high number of residential developments taking place and the improved interconnectivity to central London via crossrail.

9.16 The CCG have already taken steps to address some of the immediate issues with a recent refurbishment of the Health Centre site, however, this has been confirmed as a short term solution. The medium to longer term solution will be to create a more centralised hub in Yiewsley centred around the PCN core delivery model. The CCG have confirmed they require a Health Facility to meet there medium-term aspirations.

9.17 The proposed development comprises the construction of a new 10,000sqft D1 health facility with an attractive public realm area to the front and 20 dedicated car parking spaces for staff and users and emergency drop off space to the side. The proposed health facility would be able to accommodate circa 15 consulting/ treatment spaces plus admin and waiting spaces as per the submitted plans.

9.18 The D1 Health Facility would be built at the same time as the 235 residential units on the proposed site and would be ready for use in 2024. This meets the medium-term plan for the CCG and negotiations for the relocation could commence as soon as planning is approved. In order to transform the service provided to a growing population of patients with increased demands and expectations of the NHS, new facilities need to be provided in key locations that meets this needs in this growth corridor.

9.19 The provision of a D1 health facility would accord with chapter 8 of the NPPF; policies 3.2 and 3.17 of the London Plan; and policy S2 of the emerging London Plan. Therefore, the proposal should be supported.

Provision of residential and affordable homes

10.1 Chapter 5 of the NPPF refers to 'Delivering a sufficient supply of homes'. Paragraph 59 states that to support the Government's objective of significantly boosting the supply of homes, 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. The Council's 5 year supply of housing is not a cap on housing delivery but is a measure to ensure the minimum number of new homes are provided over the period.

10.2 Policy H1 (Housing Growth) of the Hillingdon Local Plan: Plan 1 – Strategic Policies (2012) requires that the borough meets and exceed its minimum strategic dwelling requirement in accordance with other Local Plan policies. The Borough's target was increased as part of the London Plan and will be increased further by the emerging London Plan.

10.3 Policy 2.13 Opportunity Areas and Intensification Areas states:

Development proposals within opportunity areas and intensification areas should seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses. It should realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking.

10.4 Policy 3.3 (Increasing Housing Supply) of the London Plan provides explicit strategic support for the provision of housing in London.

10.5 Policy 3.4 Optimising Housing Potential of the London Plan states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location.

10.6 Policy GG4 Delivering the homes Londoners need of the emerging London Plan states that to create a housing market that works better for all Londoners, those involved in planning and development must:

- ensure that more homes are delivered.
- support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.

- create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.
- establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

10.7 Policy H1 Increasing housing supply of the emerging London Plan states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially on sites with existing or planned public transport access levels or which are located within 800m of a Tube station, rail station or town centre boundary and on sites where there would be mixed-use redevelopment of car parks and low-density retail parks.

10.8 Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

10.9 Chapter 2 of the emerging London Plan gives a strategic framework for those parts of London that will see significant development over the lifetime of the Plan. The areas that will see the most significant change are identified as Opportunity Areas. Many of these Opportunity Areas are already seeing significant development, and they all have the potential to deliver a substantial amount of the new homes and jobs that London needs. The London Plan has a clear focus on delivery – something that will require all stakeholders to work together to unlock sites and drive the right sort of development. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

10.10 Policy SD1 Opportunity Areas states that to ensure Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:

- ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities
- ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration

10.11 The site is located within the Hayes/West Drayton Growth Corridor and the Heathrow Opportunity Area forms part of the Elizabeth Line West area which is identified to deliver 13,000 homes. The area contains a range of opportunities to support London's economic development and deliver new housing and environmental improvements.

10.12 The proposed development would deliver 235 residential dwellings (38% of which would be affordable) in this Opportunity Area that has been identified as a strategic location for the

delivery of housing, taking advantage of the delivery of the new Elizabeth Line and existing infrastructure. The principle of optimising the use of this site for the provision of residential accommodation is supported in strategic terms by policy H1 of the Local Plan: Part 1 – Strategic Policies (2012); policies 2.3, 3.3 and 3.4 of the London Plan; policies GG4, H1 and SD1; and the National Planning Policy Framework (2012).

Sequential Test

11.1 It is recognised that the proposed uses are 'More Vulnerable' than the existing commercial uses in terms of flooding and the development is located in Flood Zone 2. Therefore, a Sequential Test is required to ensure that the development is sited on land that has the lowest risk of flooding.

11.2 The development has been sequentially tested against all applications within the Hillingdon 5 year supply update paper. The assessment found only 6 sites that are sequentially preferable, however, they are not reasonably available. The rest of the sites that form the 5 year supply are either not sequentially comparable or where they are, are not preferable. The sequential test considered 2 different assessments. The first limited comparable sites to Yiewsley/West Drayton on the basis that a health facility providing services for local GP practices is being provided. The second assessment considered a more generic D1 health facility use where a catchment of the Borough was considered appropriate. Please refer to the separate Sequential Test Report prepared by Progress Planning for full details. The Exception Test is not required because development in Flood Zone 2 is considered appropriate subject to a Sequential Test which has been duly carried out. However, the FRA prepared by Stantec and forming part of this submission sets out how the development meets part B of the Exception Test. Also, this Planning Statement and the accompanying Sustainability Appraisal prepared by Progress Planning demonstrates how the development meets part A of the Exception Test.

Principle of Development – Summary

12.1 In summary, out of town retail stores in locations of this nature do not benefit from any policy protection. The proposal would result in the loss of employment floorspace and a small element of industrial floorspace, but an equivalent number of full time employment roles will be created by the delivery of the 1,000 sqm D1 health facility, as well as a significant number of new dwellings and affordable homes. The public benefits being delivered through the provision of the health facility and new homes including affordable dwellings is considered to outweigh any loss in relation to the existing uses on the site which are low density and do not make efficient use of the land situated in a Growth Corridor and Heathrow Opportunity Area.

12.2 The proposed development would deliver a much needed new health facility for Yiewsley/West Drayton and 235 residential dwellings including 80 affordable homes in this Opportunity Area that has been identified as a strategic location for the delivery of housing, taking advantage of the delivery of the new Elizabeth Line and existing infrastructure. The principle of optimising the use of this site for the provision of residential accommodation and new community health infrastructure is supported in strategic terms by local, regional and national policies.

Density

13.1 Policy 3.4 of the London Plan seeks to ensure that new developments achieve the maximum intensity of use compatible with the local context and with public transport capacity. The site

has a Public Transport Accessibility Level (PTAL) of 3 (where 6 represents the highest level of public transport accessibility and 1 the lowest), and Table 3.2 'Density Matrix' of the London Plan advises that an appropriate residential density for this urban site would be in the range of 70 – 170 units per hectare (u/ha) and 200 – 450 habitable rooms per hectare (hr/ha) for a development proposal with 2.7-3 habitable rooms per unit. Table 5.2 of the Hillingdon's Local Plan Part 2 – Development Management Policies also provides a matrix for guidance in relation to density and it recommends a similar density as set out in the existing London Plan policy above for this location.

13.2 The site has an area of 1.23 hectares and the proposal seeks to provide a total of 235 residential units, comprising 12 studios, 62 x 1 bedroom, 134 x 2 bedroom units, and 27 x 3 bedroom units. Therefore, the development would have a density of 190 units per hectare and 522 habitable rooms per hectare, which are both slightly above the recommended range.

13.3 However, emerging policy D6 Optimising housing density of the London Plan states that development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1. the site context
2. its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3. the capacity of surrounding infrastructure.

13.4 Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

13.5 The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth.

13.6 Policy D6 also stipulates that:

1. The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels.
2. The ability to support proposed densities through encouraging active travel should be taken into account.
3. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly.

13.7 The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above:

1. 110 units per hectare in areas of PTAL 0 to 1; or
2. 240 units per hectare in areas of PTAL 2 to 3; or
3. 405 units per hectare in areas of PTAL 4 to 6.

13.8 The proposal would fall below these parameters and therefore would not require a management plan or the design scrutiny set out in part F of policy D2.

13.9 Policy D4 requires the following measures of density to be provided for all planning applications that include new residential units:

1. number of units per hectare = **190 u/ha**
2. number of habitable rooms per hectare = **522 hr/ha**
3. number or bedrooms per hectare = **382 bedr/ha**
4. number of bedspaces per hectare = **593 bedsp/ha**

13.10 The following additional measures are also required for all major planning applications :

1. the Floor Area Ratio (total Gross External Area of all floors / site area) = 2.2
2. the Site Coverage Ratio (Gross External Area of ground floors /site area) = 0.5
3. the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).
   Building A – 20.05m – 49.52m
   Building B - 22.65m - 52.067m

13.11 The site is located within a designated Opportunity Area and situated in proximity of a Crossrail Station. The proposed density does not trigger the requirements for further design scrutiny as set out in policy D2 of the emerging London Plan as it would be compatible with the character and context of the site. Nonetheless, it is recognised that the emerging London Plan emphasises good design, particularly within the context of density. This approach is especially relevant in Opportunity Areas where high quality regenerative development is sought and is expected to come forward in an evolving setting. Given the changing character of this location along a main arterial road immediately adjacent to a town centre, it is considered that the proposed density should be welcomed. Please see the accompanying Design and Access Statement prepared by Assael Architecture for details of design considerations. Subject to compliance with other Policies and material planning considerations, the proposal is considered to accord with policy 3.4 of the London Plan and policy D6 of the emerging London Plan.

Housing Mix and Affordable Housing

14.1 Policy 3.8 'Housing Choice' of the London Plan encourages a full range of housing choice and policy DMH2 Housing Mix of Hillingdon's Local Plan: Part 2 – Development Management Policies and policy H12 Housing size mix of the emerging London Plan seek to ensure a practicable mix of housing units are provided within residential schemes. These policies are supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the low cost rented sector, and sets strategic guidance for Councils in assessing their needs.

14.2 DMH7 Provision of Affordable Housing of Hillingdon's Local Plan: Part 2 – Development Management Policies states that a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split 70% Affordable Rent and

RTPI
mediation of space · making of place

30% Intermediate. The proposed development would provide 38% by habitable room of the total accommodation as affordable (80 flats equating to 244 habitable rooms of the total 646 habitable rooms) which is 3% greater than the minimum policy.

14.3 On tenure split, of the 35% Hillingdon policy requirement, 70% (51 flats equating to 159 habitable rooms = 70% of 35% of the total quantum of habitable rooms) of the scheme would be London Affordable Rent by habitable room. Therefore, the proposal would exceed Hillingdon's threshold level of affordable housing in total numbers and would comply with their policy with regards to tenure split, in accordance with policy DMH7 Provision of Affordable Housing of Hillingdon's Local Plan: Part 2 – Development Management Policies.

14.4 This development is also GLA referable, so it important to compare the development against existing and emerging London Plan policies. The existing London Plan policy matches Hillingdon's Local Plan policy in reference to affordable. Therefore, the proposed level of affordable complies with the adopted London Plan as set out above.

14.5 The new Mayor of London, Sadiq Khan has made delivering affordable housing one of his key policy objectives. Therefore, the emerging London Plan seeks to encourage greater provision of affordable but also provides for fast tracking applications where a policy compliant level of affordable is being provided in order to encourage delivery of more affordable homes.

14.6 Policy H6 Threshold approach to applications of the emerging London Plan states that affordable housing is initially set at:

1. **a minimum of 35 per cent**
2. 50 per cent for public sector land
3. **50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).**

14.7 During our pre-application discussions with Hillingdon Council and the GLA, both parties disputed that MOT testing and repair centre was not a B class industrial use. For the purposes of affordable housing, we have accepted this position and have provided a level of affordable housing commensurate with this implication given policy H6 above and its reference to seeking 50% affordable on industrial land. The GLA have agreed that 50% should not be sought on the entire site, but proportioned based on the site areas of the original uses.

14.8 The combined site area measures 1.24 hectares consisting of 2 parcels of land assembled following planning advice from Hillingdon Council to ascertain the land abutting the Grand Union Canal. This plot is used as a MOT testing and repair centre and it measures 0.22 hectares. For the purposes of considering an appropriate level of affordable housing to meet the criteria for the application to be fast tracked, we have considered this use to constitute industrial and a such we have applied a 50% affordable target for the proportional uplift of the land. As this land represents 18% of the development site, through discussions with the

GLA it has been agreed that we should provide 50% affordable on 18% of the development and 35% affordable on the remaining 82%.

14.9 The scheme contains 646 habitable rooms in total. 82% and 18% of this total equates to a breakdown of 530 and 116 habitable rooms respectively as a share of the development. As explained above, 35% has been applied to the 82% (530 habitable rooms) share and 50% to the 18% (116 habitable rooms) share. This equates to a minimum affordable housing contribution of 186 habitable rooms for the larger element (B&M store) and 58 habitable rooms for the industrial land making a total affordable requirement of 244. The development will be delivering 244 habitable rooms (38% of the total development) as affordable, in compliance with policy H6 of the emerging London Plan.

14.10 Policy H7 Affordable housing tenure of the emerging London Plan states that the Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

1. a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)
2. a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership
3. 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

14.11 The proposed affordable would provide in excess of the 30% low cost rented homes in the form of London Affordable Rent. A minimum of 30% intermediate products in the form of shared ownership would be delivered and the remainder would comprise of a mixture of intermediate and low cost rented homes in accordance with Hillingdon's planning policy DMH7 as explained above. Therefore, the tenure split proposed complies with the GLA's emerging policies in the soon to be adopted London Plan.

14.12 Policy H6 also stipulates that to follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

1. meet or exceed the relevant threshold level of affordable housing on site without public subsidy - **YES**
2. be consistent with the relevant tenure split (Policy H7 Affordable housing tenure) - **YES**
3. meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant - **YES**
4. demonstrate that they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent. - **YES**

14.13 Fast tracked applications are not required to provide a viability assessment at application stage. As the affordable housing provision proposed complies with local and regional adopted and emerging policy in terms of the threshold level and tenure split, a Financial Viability Assessment is not required for the determination of this application and it can be fast tracked as stipulated in the emerging London Plan.

14.14 38% of the proposed development will be 'genuinely affordable' homes that will provide much needed affordable housing to residents of the Borough and London more widely, in accordance with policy DMH7 of Hillingdon's Local Plan: Part 2 – Development Management Policies and policies H6 and H7 of the emerging London Plan. Therefore, the affordable housing provision being delivered should be welcomed.

Impact on the character of the area & setting of listed buildings

15.1 Strategic Policy S01 of the Local Plan: Part 1 seeks to conserve and enhance the Borough's heritage assets and their setting by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage assets, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

15.2 Strategic Policy HE1 of the Local Plan: Part 1 stipulates that the Council will conserve and enhance Hillingdon's distinctive and varied environment, it settings and the wider historic landscape, which includes designated heritage assets such as conservation areas.

15.3 Strategic Policy BE1 of the Local Plan: Part 1 requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. Policies BE13 and BE19 of the Hillingdon Local Plan: Part Two – Saved UDP Policies (Nov 2012) seek to ensure that the new development complements or improves the character and amenity of the area, whilst policy BE38 seeks the retention of topographical and landscape features and provision of new planting and landscaping in development proposals.

15.4 Chapter 7 of the London Plan sets out a series of overarching design principles for development in London and policy 7.6 seeks to promote world class, high quality design and design led change in key locations.

15.6 Policy 7.8 of the London Plan states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate; development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail; and new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site.

15.7 Policy 7.9 of the London Plan states that the significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

15.8 The site is not located within a Conservation Area or Areas of Special Local Character. However, two statutory listed buildings (Yiewsley Grange and the Barn in Philpot's Yard, both listed at Grade II) are located on the far side of the High Street. A Heritage Statement prepared by Asset Heritage Consulting sets out the historical background to the site and its surroundings and assesses the significance of the site in its current form, principally in relation to the

settings of nearby heritage assets. It should be read in conjunction with the Design and Access Statement prepared by Assael Architecture.

15.9 The Heritage Statement concludes that the development would serve to 'preserve' the contribution that the settings of nearby heritage assets make to what is significant about them in heritage terms. Asset Heritage Consulting are of the firm opinion that the proposals are compatible with both local and national policy regarding the conservation and enhancement of the historic built environment, including the advice contained within the revised NPPF and its accompanying PPG, and, most important of all in heritage planning terms, pass the statutory test set by Section 66 of the Planning (Listed Buildings & Conservation Areas) Act 1990. Please refer to the accompanying Heritage Statement for more details.

15.10 In terms of the design of the development more generally, it is important to reflect the condition and appearance of the existing buildings on site. They are not of any architectural or visual amenity value and their demolition should be welcomed. This comprehensive redevelopment provides the opportunity to enhance the setting and provide an important new green link to the Grand Union Canal. This would be open for public access and provide pedestrian, cycle, visual and green linkages between the existing Celandine Route along the River Pinn to the East and the Grand Union Canal to the West of the site and Colne River Valley beyond, improving access to open space and the canal, bolstering health and wellbeing of future residents as well as existing residents living nearby. Furthermore, it is envisaged that a contribution will be provided to extend planned cycle improvements along the Grand Union Canal tow path that links up with West Drayton Crossrail Station. Further encouraging green modes of transport, greater use of the canal and improving access to public transport and open space.

15.11 The proposal has been revised through several discussions at pre-application meetings with the Council where their advice has been followed to reduce the height of the building fronting the High Street to 5 storeys and have it set back from the road by 15m. This ensures that there would be no impact to the setting of the listed buildings near to the site and it would retain an element of open spaciousness and character fronting the High Street.

15.12 Along the Grand Union Canal, the western building has been aligned so as to provide a significant gap in massing at upper levels to ensure that the development appears of an appropriate scale and is sympathetic to the existing character setting of the canal. The podium level and set back being provided from the canal enables further green landscaping along this side of the development that will improve the setting of the Blue Ribbon Network, thereby encouraging greater use of it. Currently, an existing warehouse building abuts the boundary of the towpath and the new development will be set much farther back providing welcomed relief and a greater sense of openness to the canal.

15.13 The proposed buildings would have a scale and built from public vantage points that is compatible with this design approach that is generally accepted at these locations, whilst also making the most efficient use of the site.

15.14 The building would be sited back from the main public highway and River Pinn which would ensure that it would not appear overbearing or dominant when viewed from public areas. In addition, its contemporary design and flat roof would further aid in reducing its height when viewed from its surroundings, helping to integrate it into the setting. For further consideration of the impact of the proposal on the visual amenity of the area, please refer to the accompanying Visual Impact Appraisal.

15.15 Its high-quality façade design is well articulated. The use of contrasting materials, specifically at ground level well defines where the building meets the street at eye level. This is particularly the case for the ground level health facility that would project slightly forward to provide more visual interest and to allow an active frontage to be incorporated into this elevation along the High Street.

15.16 As illustrated in the Design and Access Statement prepared by Assael Architecture including the accompanying Visual Impact Appraisal and given the design approach taken (following the pre-application advice from Hillingdon Council regarding acceptable height, layout, form and design), the development is considered to sit comfortably within the site. On this basis, the development proposal is considered to be acceptable in terms of its impact on the character and appearance of the area, in accordance with the Hillingdon Local Plan; the London Plan; the emerging London Plan; and the NPPF.

15.17 For further consideration of design and the impact of the proposal on the visual amenity of the area, please refer to the Design and Access statement and Visual Impact Appraisal that accompany this submission.

Impact on neighbours / adjacent sites

16.1 The proposed development benefits from having no immediate neighbouring residential properties that would be likely to be affected by the forthcoming scheme. The development has also been set back from all boundaries of the site to ensure that the proposal would not prejudice adjacent sites from coming forward for development.

Living conditions for future occupiers

Internal living space

17.1 The Government's national space standards contained in the Technical Housing Standards and policy 3.5 of the London Plan set out the minimum floor areas required for proposed residential units in order to ensure that they provide an adequate standard of living for future occupiers.

17.2 The development will exceed the minimum internal floor space standards of policy 3.5 of the London Plan and Technical Housing Standards. Specific attention has been given to try to provide all units with dual aspects. All habitable rooms will have access to adequate outlook and daylight in accordance with the Mayor's Housing SPG.

17.3 The main entrances to the buildings would be level and the communal corridors would have a rational arrangement with the provision of lifts and a stair core to service the flats conveniently located.

17.4 Overall, the proposed internal accommodation is considered to be of a high standard to the benefit of future occupiers, in accordance with Hillingdon's Local Plan; policies 3.5, 3.6, and 7.3 of the London Plan, and the Mayor's Housing SPG.

External Amenity Space

18.1 Table 5.3 of policy DMBH18 Private Outdoor Amenity Space of the Local Plan Part 2 – Development Management Policies sets out the minimum level of private outdoor amenity space.

18.2 It stipulates that the minimum amenity space provision is 20 sqm for studio/1 bedroom units; 25 sqm for 2 bedroom units; and 30sqm for 3 bedroom units. The total amount of amenity space required is 5,640 sqm for the proposed development given its mix. The proposed development provides private balconies or terraces to all dwellings that exceed the Housing SPG standards in size and dimensions. They also comply with Hillingdon's standards with regard to width and depth. In total, the level of private amenity space will be 2,194 sqm.

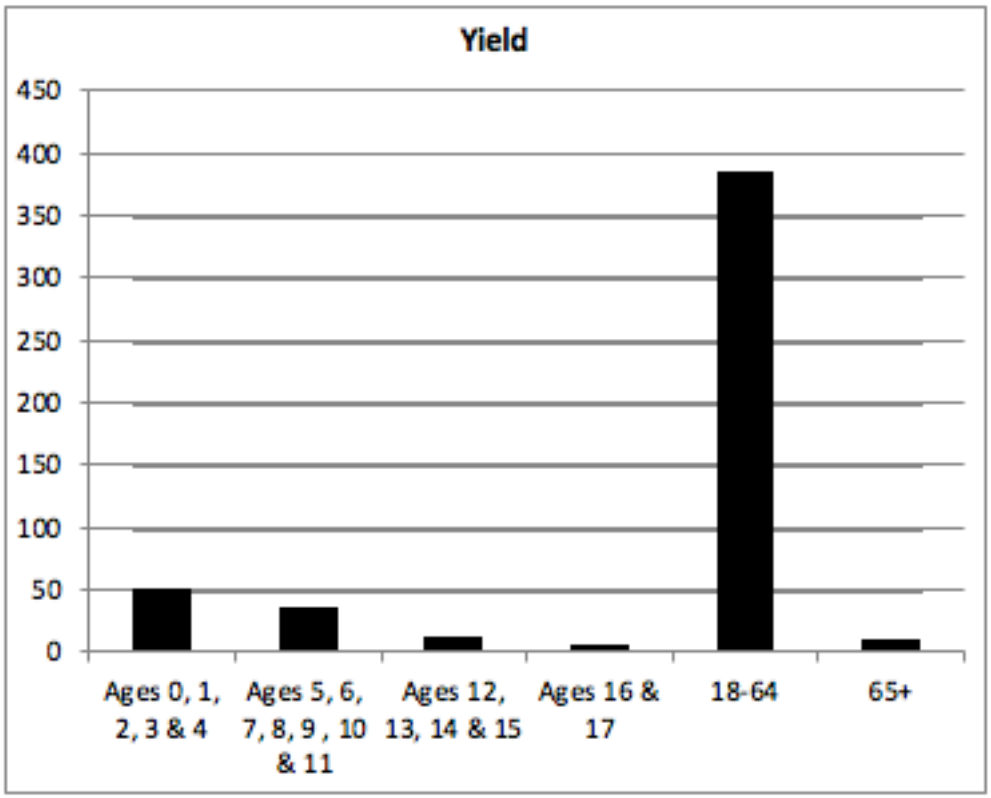
18.3 In addition, the development proposal would provide communal garden areas at podium level (communal space measuring 683sqm) located centrally within the development and around the edges of the site a further 2,833sqm. It would be usable, good quality and conveniently located. The level of communal garden space would be 3,516sqm which combined with the proposed private amenity space (2,194 sqm) would equate to a total level of outdoor amenity space of 5,710 sqm.

18.4 Furthermore, the development is located near to a number of parks and the future residents will benefit from its proximity to the Grand Union Canal and River Pinn for general outdoor recreation.

18.5 On this basis, the proposal is considered to be acceptable in terms of outdoor amenity space provision, in accordance with local and regional planning policy.

Children's Playspace

19.1 In terms of Children's Playspace, the mix and tenure suggests that the majority of children occupying the future development would be between the ages of 0-4 years old (see child yield graph below).



19.2 The GLA child yield calculator suggests that 506 sqm of play space catering for the needs of ages 0-4 should be provided and the development provides 240 sqm at podium level and 550 sqm at ground level distributed conveniently around the development that could also be shared with ages 5 and older. There is adequate space within the site to accommodate this level of play space. The site is also in proximity of a number of large parks and it benefits from direct access onto the River Pinn and Grand Union Canal. Therefore, the proposal is considered acceptable with regards to play space provision.

Transport

Access, Traffic, Servicing, Highway & Pedestrian Safety

20.1 DMT1 Managing Transport Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

20.2 DMT2 Highways Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals must ensure that safe and efficient access to the highway network is provided; the proposal does not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; safe and convenient facilities for pedestrians and cyclists are provided; impact on local amenity and congestions are minimised by routing through traffic by the most direct means; there is suitable mitigation measures to address any traffic impacts.

20.3 DMT5 Pedestrians and Cyclists of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals will be required to provide safe, direct and

inclusive access for pedestrians and cyclists and for development along the Blue Ribbon Network it is required that they enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network.

20.4 Policy 6.3 'Assessing effects of development on transport capacity' of the London Plan states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

20.5 A Transport Assessment has been submitted to consider the transport implications of this development. Some of its findings have been summarised below but for full details please refer to the report.

20.6 The existing vehicular access is a priority-controlled T-junction onto the A408 High Street, with a ghost island right turn. This arrangement is considered suitable for the use that will be generated by the development and therefore will be retained without raising any highway or safety concerns. In terms of traffic, there will be a significant reduction in trips generated from the proposed development bringing an overall betterment to the local highway network.

20.7 In terms of emergency access, a fire tender can enter and egress the proposed development in forward gear. A swept path analysis for a large fire tender around the site is provided on Drawing 46187-5501-SK005B and demonstrates that a fire tender can manoeuvre and get within the required distance of all buildings. The service road to the rear of the apartments will be restricted for emergency access only.

20.8 With regards to servicing and refuse collection arrangements, the access road has been designed to accommodate a refuse vehicle to enter and turn within the site. Swept path analysis of LBH's refuse collection vehicle is shown on Drawing 46187- 5501-SK004B. The swept path analysis demonstrates that the turning head shown with the site is sufficient to allow the refuse vehicle to turn and exit in a forward gear.

20.9 A designated bin storage area has been provided on the site adjacent to external parking area. On refuse collection day, the management company will be responsible for ensuring all bins are stored in the storage area and returned to the relevant stores after collection. This will ensure a smooth operation of refuse collection for the site.

20.10 Collection of clinical waste from the health hub will be undertaken via private collection in line with the requirements of the future occupiers.

20.11 Full details of the servicing strategy are outlined in the Delivery and Servicing Plan which accompanies this application. A Construction Logistics Plan has also been submitted with this application to demonstrate that the transport network will not be adversely affected during construction.

20.12 Pedestrian and cycle access will be provided onto the High Street at the site access and tie into the existing footway running along the front of the site. The scheme will widen the footway to 3.0m allowing this link to be safeguarded should the future aspirations from LBH for a cycleway come forward.

20.13 Access to the public realm area along the frontage of the site and the Health Hub will be provided from the High Street in the south east corner and a central link. This will encourage the community and residents to enter the site and benefit from the improvements in public realm and play areas that the scheme will deliver. A gated access will be provided to southern side of the health hub into the site for residents.

20.14 In the north west corner of the site, a 3.0m wide pedestrian / cycle access will be provided to connect with the Grand Union Canal. This link will be open at all times for public use and a chicane style gate provided to slow cyclists on approach to the canal and deter any antisocial behaviour. This link will bring a significant benefit for the wider community, creating a safe and secure connection onto the Grand Union Canal. Improvements are currently being delivered to the towpath along the Canal to deliver safe and accessible shared spaces for all users. The link through the site will improve the environment for pedestrian and cyclists and help to contributed towards the aspirations of the Mayor's Transport Strategy and Health Streets approach.

20.15 As part of the development improvements will be delivered to the public realm areas. This includes improvements to the public realm area to the front of the health hub and delivering play spaces and green areas across the site. This is key to the development as it encourages further walking and cycling as a result of the healthy environment.

20.16 The shared surface across the site encourages low vehicular speeds and makes it a more attractive environment for walking and cycling.

20.17 The development uses the existing vehicular access to High Street, with improvements to deliver a permeable site to allow pedestrians and cyclists to move around the site with ease. Improvements to the public realm and green play spaces are to be delivered in addition to a 3.0m pedestrian / cycleway through the site to provide a connection to the Grand Union Canal bringing a significant benefit to the wider community, which compiles with policies DMT1, DMT2, and DMT5 of the Hillingdon's Local Plan: Part 2 – Development Management Policies; policy 6.3 of the London Plan and the emerging London Plan.

Parking

21.1 DMT6 Vehicle Parking of Hillingdon's Local Plan: Part 2 – Development Management Policies sets the local parking standards required for development.

21.2 Policy 6.9 'Cycling' of the London Plan sets minimum standard for cycle parking.

21.3 Policy 6.13 'Parking' of the London Plan sets maximum standards laid out in Table 6.2 in the parking addendum. In addition, developments must:

- Provide parking for disabled people
- Meet the minimum cycle parking standards set out in Table 6.3
- Provide for the needs of businesses for delivery and servicing

21.4 Policy T6.1 Residential parking of the emerging London Plan sets maximum standards and stipulates that the maximum level of parking for residential development in PTAL 3 in outer London is up to 0.75 parking spaces per unit.

21.5 Stantec were commissioned by Taylor Wimpey West London (TWWL) to provide transport and highways support in respect to this development. A Public Transport Accessibility Level Technical Note was prepared to provide a review of the accessibility of the site and justification for an improved PTAL. The TfL tool gives the site a PTAL rating of 2, however it excludes rail services from West Drayton Station. The review of the accessibility of the site using the TfL PTAL methodology has identified that the distance to West Drayton Station was overestimated and the station is within the 960m threshold set by TfL. On this basis, a manual PTAL calculation was undertaken to include the rail services which gives a revised PTAL level of 3 and demonstrates that the site has a good level of accessibly.

21.7 Nevertheless, to balance the need for sufficient car parking to meet demand whilst encouraging the use of sustainable travel, on-site parking provision for the residential apartments will be provided at a ratio of 0.8 per dwelling, equating to 185 parking spaces. A parking ratio of 0.8 is justified for the following reasons:

21.8 A review of the 2011 census data has been undertaken and it demonstrates that 41% of apartment residents within the ward where the site is located (Yiewsley E306007374) do not own a car. Additionally, the data reveals the following parking ratios within the ward;

- 1 Bed Apartments: 0.54 per unit
- 2 Bed Apartments: 0.80 per unit
- 3 Bed Apartments: 0.91 per unit

21.9 Applying these ratios to the proposed development schedule provides a site parking ratio of 0.76 per unit which is consistent with the emerging London Plan maximum level of parking for this development.

21.10 TfL's Travel Demand Survey demonstrates that since the last census in 2011, the proportion of people now considering the use of more sustainable travel modes has increased. Between 2011 and 2018 for outer London journeys during the weekday, the proportions of those driving private cars has decreased by 3.8% whilst public transport use has increased by 5.0%. This public transport use is expected to increase further now through the introduction of Crossrail services at West Drayton. Due to the evidence of shifting travel patterns amongst residents in the ward, this car parking provision is justified.

21.11 All 2 bed and 3 bed apartments will be allocated with a car parking space. 16 of the 1- bedroom apartments will also be allocated 1 car parking space. The remainder of apartments will be car free. All 24 wheelchair units will be allocated with a disabled bay.

21.12 The developer is keen to promote car clubs as an alternative to private car ownership. Therefore, two car club spaces will be provided as part of the scheme. This will provide travel opportunities to both residents and the wider community who may not own a car.

21.13 The location of the car club bays on the forecourt will maximise exposure for both residents and the wider local community. Further discussion will be undertaken with car club operators such as ZipCar and Enterprise to establish the future operation of the car club on the site. The car club will be in place and operational prior to occupation of the first dwelling and marketed to new residents through the Travel Plan. See the submitted Travel Plan for further details.

21.14 The internal parking area for the residents will form a two-storey car park, with first floor access via an internal ramp. 85 spaces are provided on the ground floor with a further 82 spaces provided on the first floor. The remainder of the residential spaces are provided in the forecourt to the front of the building. Swept path analysis of the car park has been undertaken and is illustrated on Drawing 46187-5501-SK001C and SK002A.

21.15 In addition, 20 parking spaces and 1 Ambulance bay will be provided on the site for the Health Hub. These spaces will be designated for the health hub use only during operational hours and clearly marked to prevent use by the residents.

21.16 Motorcycle spaces will be provided for residential use. In line with the emerging London Plan standards, accessible parking will be delivered with a provision of 24 accessible spaces. These bays will be provided internally and externally at ground level in close proximity to the accessible units. Demand for accessible bays will be managed and standard bays could be converted for accessible users if the requirement increased in the future.

21.17 Secure cycle parking will be provided on site in accordance with the emerging London Plan standards. A total of 427 cycle spaces will be provided for the residents in designated cycle stores, located on the ground floor of the apartment blocks. These stores will be locked and entry for residents only.

21.18 Short Stay cycling parking will be provided in the form of Sheffield stands for the health facility and for visitor parking for the residential within the public realm areas making a total cycle parking provision of 470 spaces.

21.19 A Car Parking Management Plan has been prepared, outlining the management and allocation of the car parking provision. Please refer to this accompany plan for further details.

21.20 Electric vehicle parking provision will be provided on the site in accordance with the draft London Plan standards. 20% of spaces will provide active charging provision, with the remaining 80% of spaces having passive provision for future provision.

21.21 Given the site's PTAL, its location on the edge of a town centre, and proximity to a Crossrail Station, the overall level of parking provision would be considered acceptable, in accordance with policy DMT6 Vehicle Parking of Hillingdon's Local Plan: Part 2 – Development Management Policies; policies 6.9 and 6.13 of the London Plan; and policy T6.1 of the emerging London Plan.

Tree, landscaping and ecology

Tree and landscaping

22.1 Policies DMHB14 Trees and Landscaping and DMEI1 Living Walls and Roofs and Onsite Vegetation of the Local Plan Part 2 – Development Management Policies refers to the need for development proposals to retain or enhance existing landscaping, trees, biodiversity or other natural features and to provide greater urban greening.

22.2 Policy 7.21 'Tree and Woodlands' of the London Plan stipulates that existing trees of value should be retained and any loss as the result of development should be replaced.

22.3 Chapter 11 of the National Planning Policy Framework (2012) states that 'the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes'.

22.4 There are no trees within or closely surrounding the site which are subject to Tree Preservation Orders and it is not situated within a Conservation Area. There are a number of trees around the parameter of the site which are not protected. The proposed development has been designed so that, where possible, existing trees are retained. In particular, the majority of the trees adjacent to the boundaries of the site, which have good screening value, are to be retained.

22.5 Middlemarch Environmental have been appointed to consider the arboricultural impact of the scheme. The Arboricultural Impact Assessment that accompanies this application states that the development will require the removal of one group and one hedgerow, and the partial removal of two groups of trees to facilitate the scheme. These are not considered to be of any significant value and the landscaping strategy proposed includes new tree planting across the site that would mitigate any loss in amenity value from their removal.

22.6 The orientation of the site is such that the largest retained trees are located adjacent to the northern boundary of the site. The proposed new buildings have been sited so that they are not in such close proximity to retained trees that significant shading of primary living places is likely to occur and as such, it is considered that a significant conflict between retained trees and the proposed properties as a result of shading is unlikely to occur.

22.7 The proposed development has been designed so that the majority of the trees adjacent to the northern and western site boundaries, which provide privacy and screening, are retained. Additionally, new planting is proposed on the southern and eastern site boundaries. Consequently, it is considered that privacy and screening have been well provided.

22.8 The Arboricultural impact Assessment concludes that the proposed development of the site will not have a significant impact upon the visual amenity of the local area as a result of the proposed tree removal necessary to implement it. Additionally, the proposed works are unlikely to impact significantly upon the long-term health of retained trees. Whilst some works are to be undertaken within the RPAs of retained trees the nature of those works are such that they can be completed without impacting significantly upon the trees subject to the adoption of appropriate working practices. Therefore, the proposal is considered to comply with policies DMHB14 of the Local Plan Part 2 – Development Management Policies, policy 7.21 of the London Plan and chapter 11 of the NPPF.

Ecology

23.1 Policies EM7: Biodiversity, and Geological Conservation of Hillingdon's Local Plan: Part 1 Strategic Policies and DMEI7 Biodiversity Protection and Enhancement of the Local Plan Part 2 – Development Management Policies refer to the need for development to retain and enhance existing features of biodiversity and explore ways to provide biodiversity improvements.

23.2 Ecology Solutions Limited (ESL) was commissioned to undertake an Ecological Assessment of the site. This document assessed the ecological interest of the application site as whole with due regard to current guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM).

23.3 The methodology utilised for the survey work can be split into three areas, namely desk study, habitat survey and faunal survey.

23.4 A habitat survey including work to search for evidence of bats/badgers was carried out in February 2020 to ascertain the general ecological value of the land contained within the boundaries of the application site and to identify the main habitats and associated plant species, with notes on fauna utilising the application site.

23.5 No evidence to indicate the presence of roosting bats was recorded within any of the buildings within the application site during the internal and external inspections survey.

23.6 The Ecological Assessment prepared by ESL states that with the exception of the canal habitats which adjoin the western boundary of the site, opportunities for foraging and commuting bats within the application site are considered to be negligible, due to the absence of linear semi-natural features and the prevalence of artificial lighting.

23.7 No Badger setts or any other evidence to indicate the presence of Badgers, such as latrines, footprints, hairs or foraging signs, was recorded within the application site during the survey.

24.8 The report concludes that subject to implementation of standard engineering protocols and best practice throughout the construction period, it is considered that the proposed development is not likely to give rise to any significant adverse impacts on any statutory or non-statutory designated sites.

24.9 The majority the application site does not have any ecological value. The development proposals will result in an increase in both the quantum of semi-natural habitats and also the botanical diversity within the site, resulting in a net gain in biodiversity compared to the existing situation.

24.10 The site offers few opportunities for protected and notable species at present. Nevertheless, a number of appropriate mitigation measures have been identified in respect of key protected species / groups, with recommendations made to deliver enhancements compared to the existing situation.

24.11 In conclusion, on the evidence of the ecological surveys undertaken, the application site supports habitats of exceptionally little interest from an ecology and nature conservation perspective. The design of the proposed development and the implementation of mitigation measures as recommended in the accompanying ecology report will ensure that there are no adverse effects on any designated sites or protected species as a result of development at the application site.

24.12 Moreover, it is considered that the proposals offer enhancements for biodiversity over the existing situation. The proposals therefore fully accord with local, regional, and national planning policy.

Sustainable waste management

25.1 Deliveries, servicing and waste collection will take place on street, as they do in residential areas across the majority of London. Delivery vehicles will enter the site from the High Street

and use the internal access road and unload/ load on street from the collection point.

25.2 Through the development of this scheme, the access road has been designed to accommodate service vehicles up to 12m including refuse vehicles and fire tender vehicles for emergency access.

25.3 Residential waste collection will take place on street from within the internal road. Refuse collection will be carried out on a weekly basis by the council and pull up adjacent to the bin collection points from where all the waste will be transported from the collection point and stores to the rear of the waste collection truck.

25.4 Bin stores are located on the ground floor of each block of residential apartments with easy access for all residents. They will provide separation into the relevant waste streams including general waste, recycling and food waste and provide sufficient storage capacity for all the residential units. No resident will more than a 30m distance away from their nearest respective bin storage area. On bin collection day the management company will using mechanical trolleys to bring all the bins from the stores as set out in the accompanying Delivery and Servicing Plan prepared by Stantec.

25.5 Swept path analysis of a 10.5m LBH refuse vehicle has been undertaken and illustrated on Stantec drawing 46187/5501/SK004B attached as Appendix A of the said report. It demonstrates that the site can safely accommodate the refuse vehicle, which will enter the site in forward gear, turn using the internal junction and sit adjacent to the building where it will be loaded before exiting the site.

25.6 Deliveries and servicing for the health facility will take place from within the site. Medical supplies and prescriptions will be delivered by couriers when required by the GP surgery and pharmacy. This will be managed by the occupiers of the health facility and estate management company.

25.7 A dedicated storage area will be provided within the GP Surgery for clinical waste. This will be stored separate to general waste and be collected on a daily basis by private contractor to ensure safe disposal.

25.8 Overall, the refuse/recycling storage, collection and servicing arrangements are considered to comply with policy 5.17 of the London Plan.

Renewable energy/Sustainability

26.1 Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan; policy SI2 Minimising greenhouse gas emissions of the emerging London Plan; and policy DME2: Reducing Carbon Emissions of the Local Plan Part 2 Development Management Policies states that development proposals should make the fullest contribution to minimising carbon dioxide emissions.

26.2 Policy 5.7 Renewable Energy of the London Plan states that the Mayor seeks to increase the proportion of energy generated from renewable sources, and expects that the projections for installed renewable energy capacity outlined in the Climate Change Mitigation and Energy Strategy and in supplementary planning guidance will be achieved in London.

26.3 Policy 5.9 Overheating and Cooling of the London Plan states that the Mayor seeks to reduce the impact of the urban heat island effect in London and encourages the design of places and spaces to avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change and the urban heat island effect on an area wide basis.

26.4 An Energy Statement prepared by Abbey Consultants sets out an energy strategy for the proposed development. This report considers the predicted energy and CO2 demand for the proposed development at the High Street Yiewsley located in The London Borough of Hillingdon. The proposed site will be built under Part L 2013 (with 2016 amendments) of the Building Regulations and in line with the London Plan target to achieve a minimum 35% CO2 reduction over the baseline using the new draft SAP10 carbon factors.

26.5 The development will reduce regulated CO2 emissions by integrating a range of passive design and energy efficiency measures throughout the building. These measures include improving building fabric standards beyond the requirements of Part L of the Building Regulations. These measures enable the proposed scheme to go beyond Target Emission Rates (TER) and Target Fabric Energy Efficiency (TFEE) minimum standards via energy efficiency measures alone.

26.6 Following reduction of the energy demand, the strategy recommends the implementation of an Air Source Heat Pump system connected to a site-wide district heating network which will supply hot water and space heating to all residential and non-residential spaces.

26.7 The regulated energy CO2 savings expressed in terms of actual and percentage reduction after each stage of the energy hierarchy for residential and non-residential parts of the development are provided with the accompanying Energy Statement. But, its shows that the CO2 savings attributed to Regulated energy equates to a 128-tonne saving in CO2 which is equivalent to a 56% reduction when compared to the baseline figure. This is in excess of the 35% saving required. To achieve zero carbon a further reduction of 99 tonnes is required and this is to be met by a £179,000 contribution towards the Council's Carbon Fund.

26.8 Subject to a s106 to secure the contribution, the proposal will comply with local, regional and national planning policy with regards to carbon reduction, energy efficiency and incorporating green technology. Please refer to the Energy Statement prepared by Abbey Consultants for more details.

Flooding or Drainage

27.1 The EA Flood Zone map indicates that the majority of the site is located in flood zone 2 with limited encroachment of Flood Zone 3 along the River Pinn. The development is to be located outside of Flood Zone 3 and would be positioned on Flood Zone 1 and 2.

27.2 The proposed development includes residential use which is classified as 'More Vulnerable'. PPG Table 3 confirms that such development is appropriate within Flood Zone 2 subject to a Sequential Test being carried out. The development has been sequentially tested against all applications within the Hillingdon 5 year supply update paper. The assessment found only 6 sites that are sequentially preferable, however, they are not reasonably available. The rest of the sites that form the 5 year supply are either not sequentially comparable or where they are, are not preferable. The sequential test considered 2 different assessments. The first limited comparable sites to Yiewsley/West Drayton on the basis that a health facility providing services for local GP practices is being provided. The second assessment considered a more

generic D1 health facility use where a catchment of the Borough was considered appropriate. Please refer to the separate Sequential Test Report prepared by Progress Planning for full details. The Exception Test is not required because development in Flood Zone 2 is considered appropriate subject to a Sequential Test which has been duly carried out. However, the FRA prepared by Stantec and forming part of this submission sets out how the development meets part B of the Exception Test. Also, this Planning Statement and the accompanying Sustainability Appraisal prepared by Progress Planning demonstrates how the development meets part A of the Exception Test.

27.3 The FRA prepared by Statec and submitted as part of this application proposes a mitigation strategy that demonstrates that the development and future residents are safe from flooding through a number of measures as follows:

- Habitable ground floor levels are set at a minimum of 29.65m AOD to mitigate the potential residential risk of a canal breach. This is approximately 450mm above existing typical ground and also ensures the building is unaffected in the extreme 1 in 100 (1%) annual probability + 70% allowance for climate change scenario or the 1 in 1000 year event;
- The design of the scheme will ensure that any flood storage losses at the design event due to non floodable footprint at ground level will be compensated by creating additional flood storage within the site in areas of open space on a level for level basis with an overall net gain of 340 cubic metres.
- Continuous pedestrian dry access is available at the 1 in 100 (1%) annual probability + 35% climate change allowance towards the High Street in accordance with the requirements of the SFRA.

27.4 It concludes that the future occupants and users of the proposed development will be safe from flooding and there will be no detrimental impact on third parties. The proposal complies with the National Planning Policy Framework (NPPF) and local planning policy with respect to flood risk and is an appropriate development at this location. Please refer to the FRA prepared by Stantec for further details.

27.5 In terms of drainage considerations, a Surface Water Drainage Strategy Report has been prepared by Stantec and accompanies this submission. It sets out drainage arrangements for the proposed development. The hierarchy of surface water drainage options detailed in the NPPG/PPG (and consistent with the Buildings Regulations H3) has been considered as follows:

- Infiltration: While available information regarding ground conditions suggests that infiltration drainage may be feasible at the site, there is insufficient space within the site to provide soakaways that are set the required 5m away from buildings or roads.
- Watercourt: The River Pinn is located along the northern boundary of the site and it is proposed to discharge to this watercourse at a controlled runoff rate.

27.6 The proposed surface water drainage strategy consists of green/blue roofs, permeable pavements and underground cellular attenuation. Surface water runoff has been split across two outfalls based on the proposed site topography with controlled runoff rates from each outfall to a maximum of 2.9 l/s. This provides a significant reduction in comparison to the calculated existing runoff rates for the site and is close as reasonably practicable to the equivalent greenfield runoff rates.

27.7 The proposed surface water drainage system has been designed with no flooding up to and including the 1 in 100 (1.0% annual probably rainfall event with surcharged outfalls. The

drainage system will be maintained by a Management Company in accordance with an Operational and Maintenance Plan for the site.

27.8 In conclusion, principles advocated by local, regional and national planning policy and guidance in relation to surface water and foul drainage have been followed and the scheme is compliant with regards to drainage.

Noise

28.1 Policy EM8 'Land, Water, Air and Noise' of the Local Plan Part 1 – Strategic Policies; policy 7.15 of the London Plan; and policy D13 of the emerging London Plan refer to the need for new residential accommodation to offer appropriate amenity safeguarded from excessive noise exposure.

28.2 The proposed development is unlikely to impact neighbouring properties given its use and location, nor is it likely to prejudice surrounding commercial businesses given the generous separation distances. In order to fully assess noise considerations, Stantec were commissioned to undertake a Noise Impact Assessment to support this application. Please refer to this report for full details.

28.3 It sets out that an attended environmental sound survey was undertaken between approximately 18:15 to 20:00 hours on Tuesday 11 February 2020 and 04:00 to 07:00 hours and 08:45 to 12:00 hours on Wednesday 12 February 2020 in order to determine the existing sound climate at locations considered representative of sound levels incident on the future development.

28.4 Calculations indicate that with embedded mitigation measures in place, the LOAEL is unlikely to be exceeded in the communal podium garden.

28.5 Based on the results of the external building fabric assessment, internal ambient sound levels are likely to meet the proposed LOAEL during daytime and night-time periods with appropriate mitigations measures in place.

28.6 With appropriate mitigation measures and a suitably worded condition, plant noise levels are unlikely to have an impact on proposed and existing noise sensitive receptors.

28.7 In summary, the assessment has demonstrated that, with appropriate mitigation incorporated into the design and building fabric, the site is suitable for residential development in relation to noise impacts, in accordance with local, regional and national planning policy.

Air Quality

29.1 Policy 7.14 'Improving air quality' of the London Plan states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans. It also recommends that development proposals should promote sustainable design and

construction to reduce emissions from the demolition and construction of buildings. Policies GG3 and SI1 of the emerging London Plan also refers to the need to improve air quality in London to improve health and wellbeing.

29.2 Policy EM8 'Land, Water, Air and Noise' of the Local Plan Part 1 – Strategic Policies states that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

29.3 Policy DMEI 14 'Air Quality' of the Local Plan Part 2 – Development Management Policies states that Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Development proposals should, as a minimum:

i. Be at least 'air quality neutral';
ii. Include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii. Actively contribute towards the improvement of air quality, especially within the Air Quality Management Area;

29.4 The site is located within an Air Quality Management Area. An Air Quality Assessment has been prepared to consider the implications on air quality of this scheme coming forward. It explains along with the Energy Statement submitted that the buildings would be fitted with Air Source Heat Pumps that would ensure that the building emissions of the scheme represents a significant improvement to air quality in comparison with the existing buildings.

29.5 In terms of tansport emissions, the proposal would result in less trips in comparison with the existing use which would ensure that there is a significant improvement in air quality as experienced currently. The development proposal would provide 20% active Electric Vehicle Charging bays with all remaining spaces having passive provision which would encourage the use of cleaner vehicles. The application is also accompanied by a Travel Plan which will encourage use of further green modes of transport that would improve air quality. The provision of the cycle link and improvements for cyclists/pedestrians within and around the site will also encourage less use of cars by future residents and surrounding neighbours.

29.6 Overall, the proposed development would improve air quality in comparison with the existing uses. Therefore, the proposal would not be considered to raise any air quality concerns, in accordance with policy EM8 'Land, Water, Air and Noise' of the Local Plan Part 1 – Strategic Policies; policy DMEI 14 'Air Quality' of the Local Plan Part 2 – Development Management Policies; and policy 7.14 of the London Plan.

Archaeology

30.1 Policy 7.8 Heritage Assets and Archaeology states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development

affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Similarly, policy HE1 Heritage of the Local Plan Part 1 – Strategic Policies and policies DMHB1 Heritage Assets and DMHB7 Archaeological Priority Areas and Archaeological Priority Zones of the Local Plan Part 2 – Development Management Policies seeks to conserve and protect archaeology of significance.

30.2 In accordance with central and local government planning policy and guidance, a desk based assessment has been undertaken by RPS Group to clarify the archaeological potential of the site. The study area is located within the Colne Valley Archaeological Priority Area and it is considered to have a low to moderate potential for Palaeolithic activity at depth within the study site and known potential for geoarchaeological deposits of unknown date.

30.3 The DBA states that agricultural activity from the Medieval period onwards is considered likely to have had a moderate, but widespread, negative impact on below-ground archaeological deposits. The construction of an industrial complex within the site in the mid 20th century is considered likely to have had a severe, widespread, negative impact on below-ground archaeological deposits. The demolition of the industrial complex and subsequent construction of a commercial retail store and car parking facilities during the late 20th century is considered likely to have further cumulative negative impact on any below ground deposits.

30.4 It is recognised that due to potential for activity associated with the Palaeolithic period, as well as known presence of undated geoarchaeological deposits, GLAAS is anticipated to require a staged programme of archaeological investigation prior to commencement of the development which could be achieved by condition.

30.5 As remains of national or local significance are not anticipated, it is considered that any mitigation that may be required could follow the granting of planning that would protect any archaeology of significance and the proposal would thereby comply with local, regional and national planning policy.

Contamination

31.1 CBRE were appointed to prepare a Phase 1 Environmental Assessment that would assess the potential for soil and/or groundwater contamination, both at and in vicinity of the site, and assess its significance in terms of risks to human health and/or controlled waters in the context of the proposed redevelopment of the site for a residential and commercial end use.

31.2 Based on the findings of the Phase I Environmental Assessment several plausible pollutant linkages have been identified at the site and the overall risk is currently considered to be medium in the context of the proposed redevelopment of the site. However, through pre-development remediation and / or the incorporation of risk mitigation measures, as necessary, it is considered that the overall risks can be satisfactorily reduced to low and the site made suitable for its intended use.

31.3 The accompanying Phase 1 Environmental Assessment recommends that the actual site condition is ascertained through the completion of an intrusive Phase II ground investigation and completion of a Tier 2 Generic Quantitative Risk Assessment (GQRA).

31.4 The Phase II ground investigation will seek to confirm the existence of the potential pollutant linkages identified within the preliminary conceptual model (forming part of the Phase 1 report) and determine the need for, and extent of, further assessment or remediation/mitigation works necessary to reduce identified risks to an acceptable level and render the site suitable for its intended use. Subject to appropriate conditions to secure further investigations and necessary remediation/mitigation if required, future occupiers/users will be safeguarded from contamination in accordance policy 5.21 Contaminated land of the London Plan and the NPPF.

Other Matters

32.1 A Design Fire Safety Strategy prepared by Bennett Associates (fire safety consultants) accompanies this submission. The report concludes that the building designed satisfies the functional requirements of the Building Regulations 2010 (Fire Safety).

Conclusion

33.1 In conclusion, there is Local and London Plan support for making more efficient use of sustainable, underutilised brownfield edge of town centre sites within Opportunity Areas for the delivery of housing, including affordable housing. This proposal would also incorporate a D1 Health Facility which would provide crucial community services that meet the needs of the local community and its growing population.

33.2 This proposal seeks to provide 80 residential units (244 habitable rooms) as affordable which equates to 38% of the total scheme, compliant with local policy and meets the eligibility for the Mayor of London's fast track planning process which seeks to increase the delivery of affordable homes in London. 51 London Affordable Rent units (159 habitable rooms) are proposed which complies with Hillingdon's tenure split of 70/30 as a proportion of their affordable housing policy.

33.3 The design of the scheme draws inspiration from the character/heritage of the local area and Grand Union Canal and delivers genuine improvements to the streetscape and general character of the area through provision of modern, sensitively designed buildings, similar to new developments in the area, such as Drayton Wharf, Padcroft Works, and 2-24 Horton Road. The scheme enables a green link incorporating a cycle route to be provided between the existing Celandine Route along the River Pinn and the Grand Union Canal to the West of the site and Colne River Valley. Furthermore, it is envisaged that a contribution will be provided to extend the cycle improvements along the Grand Union Canal towpath that links up with West Drayton Crossrail Station.

33.4 The proposed development benefits from having no immediate neighbouring residential properties that would be affected by the forthcoming scheme in terms of residential amenity. Whereas, future occupiers will benefit from a high standard of residential amenity in terms of unit size, quality, and access to amenities such communal gardens and access to improved links to local parks and the Grand Union Canal.

33.5 Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of Council's Local Plan.