PROGRESS PLANNING

Sequential Test

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:

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February 2020

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Introduction

1.1 Progress Planning have been commissioned by Taylor Wimpey Plc (The Applicant) to prepare and submit a Sequential Test to the London Borough of Hillingdon (The LPA) with an application for Full Planning Permission that seeks No. 235 residential dwellings and 10,000sqft (929sqm) of D1 (Health Facility) Floor Space, with associated access, car parking, hard standing and landscaping. The Site, 217 High Street, Yiewsley, consists of a mix of A1 (retail) and B2 (Light Industrial). A very limited portion of the application site is located within Flood Zone 3a (5.5%), a greater portion of the site is in Flood Zone 2 with the rest in Flood Zone 1, as denoted on the below:

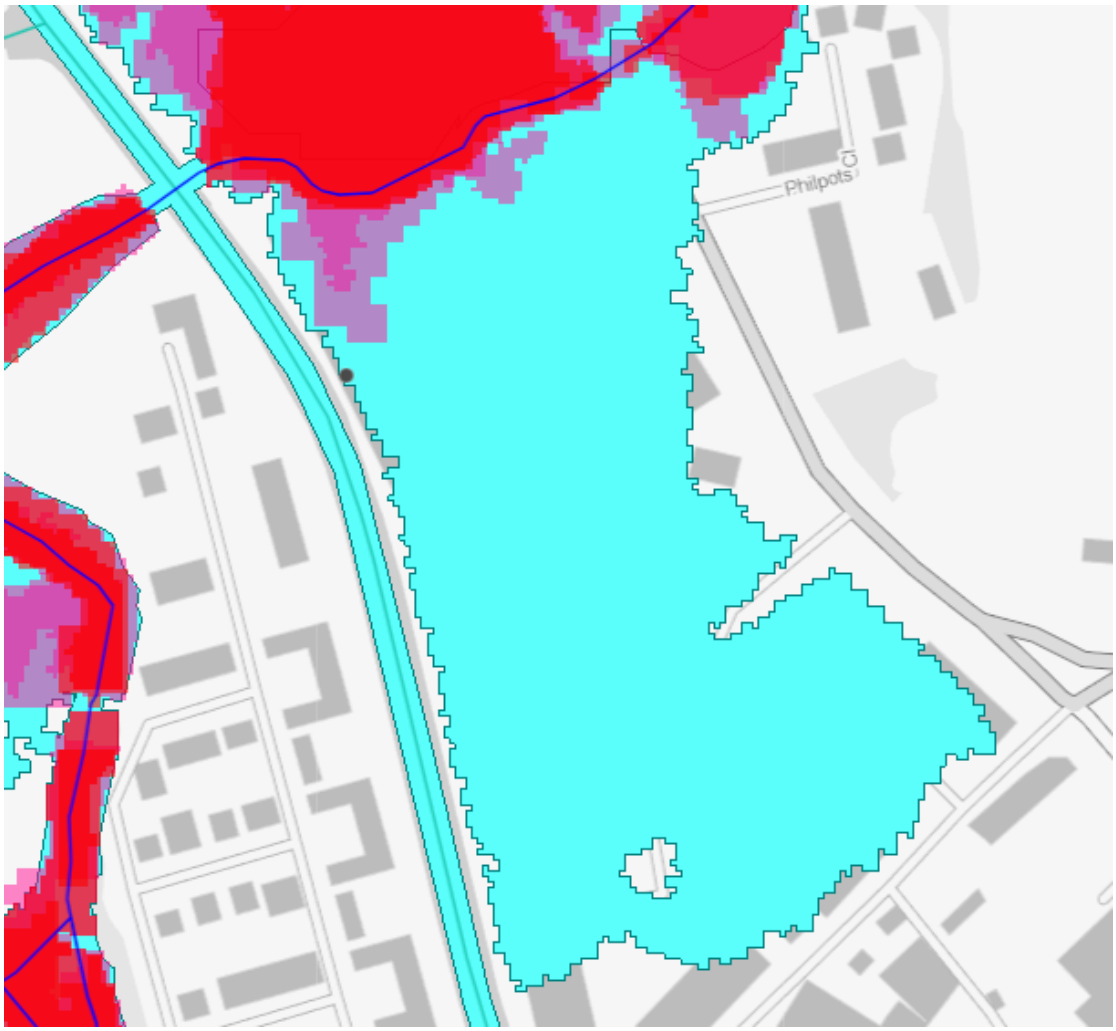


Figure 1 – Extract from the West London Strategic Flood Risk Assessment (2017)

RTPI
mediation of space · making of place

1.2 This Sequential Assessment has been informed by the Planning Practice Guidance, the West London Strategic Flood Risk Assessment, The Hillingdon Local Plan (part 2) and discussions with the LPA. This Statement will also consider the LPA's five-year supply of housing, which has formed a discussion point with the LPA.

Policy Background

2.1 The National Planning Policy Framework (NPPF) states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, it should be made safe without increasing flood risk elsewhere. When considering new development, the NPPF is clear in stating that a sequential, risk-based approach to the location of development should be taken to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management;
- using opportunities offered by new development to reduce the causes and impacts of flooding; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations

2.2 The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. The NPPF is clear in stating that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The starting point for the application of the test is the Strategic Flood Risk Assessment, and a sequential

approach should be used in areas known to be at risk from any form of flooding. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate.

2.3 For the Exception Test to be passed it must be demonstrated that: -

- the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Both elements of the test will have to be passed for development to be allocated or permitted.

2.4 Finally, specifically when determining planning applications, the NPPF states that LPA's should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- 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; and
- development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

2.5 The development plan for Hillingdon Council consists of the following:

- The Hillingdon Local Plan: Part 1 – Strategic Policies

- The extant 2007 Saved Unitary Development Plan policies adopted as the Hillingdon Local Plan: Part 2
- The London Plan

2.6 Policies relevant to this Sequential Test are detailed below.

2.7 Paragraph 8.84 of the Hillingdon Local Plan: Part 1 – Strategic Policies states that development proposed in Flood Zones 2 and 3 (medium and high probability) will need to provide evidence of the Sequential Test outlined in the NPPF.

Planning Policy and the Five-Year Supply

2.8 The LPA have recently adopted the Local Plan Part 2, which, through the allocation of sites and Development Management Policies, sets out how the LPA will deliver the growth set out in the Local Plan Part 1 (Strategic Policies). During the assessment of Local Plan Part 2, the Inspector charged with assessing Soundness of the Plan, confirmed that the LPA have committed to an early review of the Plan, to account for the growth sought by the Intend to Publish London Plan. The commitment to an early review is recognition of both the length of time that passed between adoption of Part 1 of the Plan and Part 2 of the Plan and to take account of the Intend to Publish London Plan housing target for Hillingdon of 10,830 dwellings (1083 dwellings per annum). It should be noted, at this juncture, that the housing target should not be seen as a numerical cap for development, and exccedance of this figure, through sustainable development, is encouraged.

2.9 The LPA assert that, when considered against the annualized target of 1083 dwellings per annum, there are able to show 6.22 years of Housing Land Supply. The Supply is, in the main, made up of sites that have secured Planning Consent and subsequently been allocated in Local Plan Part 2. The nature of the allocations essentially front load the delivery to the first five years of the plan, given that the majority of sites benefit from consent are either under construction or indeed complete. This is a symptom of the retrospective nature of the Site Allocations in Local Plan Part 2, which sought to allocate consented sites.

2.10 The proposal provides the opportunity to further strengthen the LPA's five year supply of housing, which is likely to be delivered in monitoring year 22 / 23. This document does not seek to interrogate the LPA's five year supply position. Rather, the applicant's consider that the five year supply of housing and the sequential test serve two distinctly different Planning Functions. The Sequential Test seeks to steer development to the areas of lowest flood risk, whilst the five year supply seeks to maintain a healthy supply of new dwellings across the plan period. The NPPF does not reference the Five Year Supply position of the LPA in determining whether there are any reasonably available sites with a lower risk of flooding. Rather, paragraph 158 of the Framework confirms that *"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".* This confirms the scope of the Sequential Test, insofar as it confirms that:

- Sites must be reasonable available
- Sites must be able to accommodate the proposed development
- Sites must be in an area of a lower risk of flooding

2.11 There is no requirement for one to consider the five year supply of housing assessment in a Sequential Test and the status of the same is not a relevant consideration. The fact that the LPA does or does not have a five year supply of housing is not determinative in Sequentially Testing sites for development.

2.12 The following sets out the methodology for carrying out the assessment, specifying the criteria relating to the availability, comparability and consideration of flood risk of the application site when compared with other sites that make up the five year supply of housing.

Step 1 - The Development, Flood Risk and Search Area

The Development

3.1 The development, subject to this sequential test consists of: Redevelopment of the site to provide 235 residential dwellings, including 80 affordable dwellings (244 hab rooms, 38%), 929 sqm of D1 (Health Facility Floorspace), 185 parking spaces for the residential dwellings, 21 car parking spaces for the D1 Health Facility, with associated access, hard standing and landscaping.

3.2 Both D1 and C3 uses fall within the More Vulnerable category, as such both 'elements' of the proposal must be considered as part of this assessment. The LPA, as advanced in Pre-Application discussions, consider that the residential development should be assessed separately to the proposed D1 floorspace. The Applicant disagrees with this approach, insofar as approval is sought for the C3 and D1 uses as part of the same proposal. As such, for the purpose of this Sequential Assessment, the Development being assessed is the delivery of 235 residential dwellings and 929sqm of D1 (Health Facility) floorspace. Both 'elements' of the proposal are inherently linked and as such, will be delivered together. The accompanying letter from Apollo Medical sets out the aspirations of the Clinical Commissioning Group and how Health Facility will be utilised, including an expected delivery of 2024.

The Flood Risk

4.1 The site consists of Flood Zones 1, 2 and 3(a). No part of the site is within Flood Zone 3(b). As detailed below, the site is considered to be both Low Risk and Very Low Risk in regard to Surface Water Flooding. The proposal, through the implementation of raised habitable floor levels, a comprehensive flood compensation scheme that delivers a net gain in flood storage and an appropriate sustainable drainage strategy is likely to improve the risk of fluvial and surface water flooding both on and off-site. Safe, dry pedestrian escape is available for all residents and users of the development.



Figure 2 Extract from Surface Water Flood Maps

4.2 During the development of the proposal, the Applicants undertook a Sequential approach within the site. The results of this assessment resulted in ensuring that the more vulnerable development (the C3 and D1 uses) were sited outside of Flood Zone 3. With landscaping being provided in Flood Zone 3. Sequentially preferable sites will therefore have to be:

- Located within Flood Zone 2
- Located within an area of Low / Very Low Risk of Surface Water Flooding

4.3 A similar approach was utilised by the LPA in the development of the Strategic Flood Risk Assessment, which, in part, Sequentially Assessed the emerging Site Allocations contained within the Local Plan Part 2. In this assessment the LPA considered:

"Therefore a sequential approach within the sites could be used to avoid areas at risk, and the built development permitted only in areas outside the floodplain. These sites therefore pass the Sequential Test".

The LPA's Sequential Test passed sites that included parcels of land within Flood Zone 3, where there is sufficient space for the development to take place outside of the same.

4.4 The built development proposed by this application is outside of Flood zone 3, and as such the assessment will only consider sites within flood zones 2 as comparable and sites within Flood Zone 1 as preferable, subject to further consideration, as set out in the Search Criteria section of this report.

4.5 It should be noted that as the development is not within Flood Zone 3 and that the development consist of more vulnerable uses, rather than highly vulnerable uses and exception test is not required. This is confirmed by the Planning Practice Guidance. Notwithstanding this, the application is accompanied by a detailed Flood Risk Assessment which sets out how the proposal complies with Part B of the exception test. The Planning Statement and the Sustainability Appraisal set out how compliance with Part A is found.

The Area of Search / Comparable Sites

5.1 The LPA consider that as the Strategic Housing Target (10,830 units) is a whole Borough target, and that there are no restrictions as to which wards should deliver the growth and as such the area of search should be the whole of the Borough. The Applicant's disagree with this stance. The Local Plan, Part 1 (whilst now aged), sets out that some 15% of the growth of the Borough should be accommodated within the Hayes / West Drayton corridor, which is a significant portion of growth within a relatively small area. Furthermore, the site is within the Heathrow Opportunity Area, as identified by the GLA. This reflects the sites sustainable location, close to the West Drayton Cross Rail Station. This spatial strategy, which seeks to allocate growth to the most sustainable areas is relevant in the assessment of the Sequential Test.

5.2 The Development, as set out in the preceding, also includes 926sqm of D1 (Health Facility) floorspace. The catchment of such a facility is relatively narrow (circa 5 miles). However, as there is a need for a new facility to be located to serve the needs of the population of Yiewsley, it is appropriate to narrow the area of search to alternative sites within Yiewsley itself. This is supported by the letter appended to this test. There are currently three GP surgeries operating from two independent buildings. The proposal seeks to combine two of the practices into a new facility that better meets the needs of their patients (including the need for car parking). The Applicants are content to secure the provision of the Health Facility by way of a S106. Whilst discussions are ongoing with the Local GP practices, it is important to also consider a position in which a Health Facility for the Local GP practices is not secured. Therefore, this sequential assessment will consider two possibilities. The Area of Search for both will consist of the whole Borough. Assessment 1 will discount any sites outside of Yiewsley as they are not considered to be sequentially comparable. Assessment 2 will include site outside of Yiewsley, which represents the Fall-Back position should commitment from the CCG not come forward during the lifetime if this application.

5.3 Limiting the Search Area in assessment 1, to sites within Yiewsley is an established principle, as set out in the West London Strategic Flood Risk Assessment, which states:

***"Search Area:** The default area should be the whole of the LPA area in question. This can be reduced where justified by the functional requirements of the development or…"*

5.4 The development incorporates 926sqm of D1 Floor Space. As envisaged, the floorspace will serve to meet the Local Needs of the residents of Yiewsley, providing a new Health Facility to replace the existing GP infrastructure into one building, which seeks to meet the Clinical Commissioning Groups requirements as part of the evolution of Primary Care Networks. The function of the Health of Facility serves to meet the needs for the residents of Yiewsley. As such, geographically, the site must be within Yiewsley to serve to meet the needs of the residents.

5.5 As assessment will first be made to assess whether the development is sequentially comparable. The assessment of comparability is formed on the following:

Assessment 1 – to be considered comparable the development must:

- Provide at least 150 dwellings with potential for enhancement
- Provide at least 800 sqm of D1 Floorspace
- Be located within Yiewsley

Assessment 2 – To be considered comparable the development must:

- Provide at least 150 dwellings with potential for enhancement
- Provide at least 800 sqm of D1 / Flexible commercial uses

5.6 If a site is found to be sequentially preferable, an assessment will be undertaken as to whether the site is available for development. To be available for development the proposal must:

- Not be under construction / completed
- Be available to purchase on the open market

  or
- Receive confirmation from the land owner that the development site is available to purchase

5.7 Developments must be Sequentially Comparable, Sequentially Preferable and available. If a development is found that is both Sequentially Preferable and Available, then the proposed development, subject of this assessment would fail the Sequential Test. To test availability a Site Visit will be carried out to check commencement, a review of the LPA's Planning Register will be conducted to check pre-commencement condition submissions and phone survey of developer's / land owners. It should be noted that appeal decisions have confirmed that sites with Planning Permission are generally not available, however the criteria used by this Test seeks to include such sites which will only be discounted if they are under construction or completed.

Comparable Sites – Evidence Base

6.1 The Sequential Test considers all sites listed within the Council's Five-Year Supply of Housing, which is considered to form the most up-to-date evidence available. The test considers sites on a like for like basis, although seeks to provide some flexibility. Developments which provide 150 dwellings are considered to be a suitable baseline, as with enhancement, they may be able to deliver the quantum of development sought by this proposal.

6.2 Similarly, a pragmatic approach has been taken in consideration of the D1 use. Where a development proposes a similar level of D1 floor space, or provides flexible community / commercial uses, the development will be considered as comparable.

Conclusions on the Sequential Test

7.1 The detailed Sequential Test is attached as Appendix A to this statement. A total of 37no. sites were considered as part of the assessment.

Conclusions on Assessment 1 - GP Accommodation Provided

8.1 Out of the No. 37 sites assessed, no sites provided D1 (GP Practice) use within Yiewsley. As such no sites were considered to be Sequentially Comparable as they do not provide D1 uses to serve Yiewsley. On the assumption that a Health Facility to host the Local GP Practices are provided, the development Passes the Sequential Test.

Conclusion on Assessment 2 - Generic D1 Use (Health Facility) Provided

9.1 Out of the 37 sites assessed, 6 sites were considered to be sequentially preferable as they could provide both the level of residential accommodation and D1 floorspace provided by the development. However, whilst the sites were sequentially preferable, development has either commenced, part commenced or been completed on all of the preferable sites. As such the sites are not available to accommodate the

development. It is therefore concluded that the application scheme passes the Sequential Test on the assumption that a more generic D1 Health Facility is provided.

Overall Conclusion

10.1 The methodology sets out that the area of search for both assessments is the whole Borough. This also confirms that the test is seeking reasonably available sites of a comparative type and quantum of development and provides a pragmatic approach to assessing the same. The methodology has been developed based on best practice as advanced through recent Planning Applications and indeed the LPA's own Strategic Flood Risk Assessment. It is therefore concluded that the methodology is robust.

10.2 Two sequential outcomes have been tested, which further endorses the pragmatic approach utilised by this test. No sequentially preferable sites were found in assessment 1 and none of the sequentially preferable sites in assessment 2 are available to accommodate this development. The application proposal therefore passes the Sequential Test, confirming, in principle, that the development is acceptable within Flood Zone 2.

Appendix A - Sequential Assessment

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Former Allotments and Melrose Close Car Park, Barnhill	Allocation	112	N/A	Flood Zone 1 Low / Medium Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ Capacity too low ➢ No D1 floorspace	**Not sequentially comparable**: ➢ Capacity too low / no room for enhancement ➢ No D1 floorspace
Crown Trading Estate, Botwell	Allocation	197	Commercial Ground Floor units with Active Frontage	Flood Zone 1 Low / Medium / High Risk of Surface Water Flooding over small part of the site	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ Capacity too low ➢ No D1 floorspace	**Not sequentially comparable**: ➢ Capacity too low / no room for enhancement ➢ No D1 floorspace

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Enterprise House, Botwell	Allocation	96	Commercial units on Ground Floor	Flood Zone 1 Very Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ Capacity too low ➢ Listed Building Conversion	**Not sequentially comparable**: ➢ Capacity too low / no room for enhancement ➢ Listed Building Conversion
*The Old Vinyl Factory, Botwell	Allocation	350* to be delivered within five year	Up to 4,700 sqm of D1 and D2 Floor space	Flood Zone 1 Very Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley	**Sequentially Preferable.** Not available – development is underway / part complete.

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Eastern End of Blyth Road Site A, Botwell	Allocation	120	600sqm of B1(a)	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ Capacity too low ➢ No D1 floorspace	**Not sequentially comparable**: ➢ Capacity too low / no room for enhancement ➢ No D1 floorspace
Eastern End of Blyth Road Site B, Botwell	Allocation	118	Mixed use (non-specific)	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ Capacity too low ➢ No D1 floorspace	**Not sequentially comparable:** ➢ Capacity too low / no room for enhancement ➢ No D1 floorspace

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Fairview Business Centre Sites A & B, Botwell	Allocation	260	Mixed use (non-specific)	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace	**Not sequentially comparable:** ➢ Capacity too low / no room for enhancement ➢ No D1 floorspace
*Land to South of the Railway, including Nestle Site A	Allocation	1022	Mixed use (non-specific)	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable:** Outside Yiewsley	**Sequentially Preferable.** Not available – development is underway / part complete.
*Land at 3, 233-236, Nestles Avenue	Allocation	457	Mixed use (non-specific)	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley	**Sequentially Preferable.** Not available – development is underway / part complete.

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Harefield Grove, Harefield	Allocation	26	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace / no room for enhancement ➢ Capacity too low
Chambers Business Park, Heathrow Villages	Allocation	7	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Bedfont Cross Stanwell Road, Heathrow Villages	Allocation	44	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement
Former Garage Site Rear of 6-16 Nelson Road, Hillingdon East	Allocation	6	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Building 3, Hyde Park Hayes, Pinkwell	Allocation	157	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable:** ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Conversion Scheme, no scope for enhancement	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Conversion Scheme, no scope for enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Bourne Court, South Ruislip	Allocation	87	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement
Former Early Learning Centre Acol Crescent, South Ruislip	Allocation	33	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable:** ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
401 Uxbridge Road, Hayes, Townfield	Allocation	20	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement
Silverdale Road/Western View Site A, Townfield	Allocation	42	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low / No room for enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
*Chailey Industrial Estate Site A, Townfield	Allocation	331	700sqm of flexible commercial floorspace	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace	**Sequentially Preferable.** **Not available** – development is underway / part complete.
*RAF Uxbridge, Uxbridge North	Allocation	514	Mixed	Flood Zone 1, 2 and 3 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley	**Sequentially Preferable.** Not available – development is underway / part complete.

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
297 - 299 Long Lane, Uxbridge North	Allocation	36	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable:** ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low / No room for further development
Grand Union Office Park, Uxbridge South	Allocation	133		Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable:** ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for further enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Waterloo Wharf, Uxbridge South	Allocation	52	N/A	Flood Zone 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low ➢ Development Complete	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low ➢ Development complete
Randells, Uxbridge South	Allocation	58	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low no room for enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Bridge House, Riverview House & Waterside House, Uxbridge South	Allocation	140	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low
Dolphin Bridge House, Uxbridge South	Allocation	41	N/A	Flood Zone 1, 2 & 3 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Weir House, Uxbridge South	Allocation	16	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable:** ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low
Allport House, Uxbridge South	Allocation	28	N/A	Flood Zone 1 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Woodbridge House, Uxbridge South	Allocation	10	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low
The Blues Bar, West Drayton	Allocation	38	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Maple And Poplar Day Centre, Yeading	Allocation	34	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low
*Padcroft Works Site A, Yiewsley	Allocation	247	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ No D1 floorspace	**Sequentially Preferable.** Not available – development is underway / part complete.
*Padcroft Works Site B, Yiewsley	Allocation	104	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable:** ➢ No D1 floorspace	**Sequentially Preferable.** Not available – development is underway / part complete.

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
*Trout Road Site A (Kirby and Rainbow Industrial Estates), Yiewsley	Allocation	149	A3 / B1(C)	Flood Zone 1 & 2 Low – Very High Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ No D1 floorspace	**Sequentially Preferable.** Not available – Part of Development (Site A and Site B) are complete / under construction. Appears to be a desire to maintain property in current use as per 2018 application for parking associated with Heathrow. No live / pending application for development.

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Land to Rear of Horton Road, Yiewsley	Allocation	87	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable:** ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement
Morrisons Supermarket 41-67 High Street, Yiewsley	Allocation	144	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement

Site	Allocation / Permission	Expected Delivery (first five years)	Other Development?	Flood Risk	Sequential Assessment 1 (Assuming delivery of a Health Facility to provide GP accommodation)	Sequential Assessment 2 (Assuming Delivery of a generic D1 Health Facility)
Packet Boat Marina, Yiewsley	Allocation	25	N/A	Flood Zone 1 & 2 Very Low / Low Risk of Surface Water Flooding	**Not sequentially comparable**: ➢ Outside Yiewsley ➢ No D1 floorspace ➢ Capacity too low	**Not sequentially comparable**: ➢ No D1 floorspace ➢ Capacity too low / no room for enhancement

* Where sites where considered Sequentially Preferable, a detailed analysis was undertaken to assess whether they were available. This involved:

- Site visit to check commencement / completion, Review of Planning Register to check condition submission(s) & phone survey with land owners / developers to see if available.