

rappor



# Home Bargains, 217 High Street, Yiewsley, West Drayton

TJ Morris Ltd

Travel Plan

June 2023





## Document Control

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# 1 Introduction

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## General

- 1.1 Rappor have been instructed by TJ Morris Ltd to prepare Travel Plan (TP) in support of a planning application concerning the redevelopment of the existing retail unit at 217 High Street, Yiewsley, West Drayton, UB7 7GN.
- 1.2 Planning permission is sought for the refurbishment of existing retail unit (Class E), including installation of new shopfront, reconfiguration of car park, landscaping, external plant, and associated works.
- 1.3 Permission is also sought for the modification of goods restriction associated with the current permission which allows up to 8% of the retail floorspace to sell food and drink, to be increased for up to 30%.
- 1.4 Home Bargains operates on the basis of approximately 70% of floor space dedicated to non-food products and 30% for the sale of food and drink products (+5%). It is important to note that the nature of the food and drink items on sale (discount products) do not mirror the typical offering associated with conventional food-based retailers (fresh foods etc).
- 1.5 A Transport Assessment (TA) and a Technical Note (TN) have been prepared under separate covers.
- 1.6 This TP has been informed by a detailed site visit on Friday 21st April 2023 and Friday 26<sup>th</sup> May.

## Pre-Application Consultation

- 1.7 The applicant held a pre-application meeting with Hillingdon Council (HC) on the 5<sup>th</sup> May 202 a formal pre-application response was provided on 26<sup>th</sup> May 2023 (ref: 68663/PRC/2023/53). The pre-application response is attached at **Appendix A**, highlighting a number of highways and transport related comments, which are addressed in the accompanying TA and TN.
- 1.8 In relation to the TP, the pre-application response stated:

*“For the proposed scale of development, a Travel Plan (TP) is required. This requirement conforms with Transport for London’s (TfL’s) guidelines as it would address all good practice mechanisms necessary to achieve a modal shift away from the private motor car thereby leading toward a sustainable personal travel mode to and from the site. The Travel Plan should be produced in accordance with the latest Transport for London Guidance available at:*



<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/travel-plans>

*As surety that the Travel Plan will be implemented and targets achieved, the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This would be secured by way of a Section 106 agreement. If the Travel Plan is successful the bond will be returned."*

## Site Location and Composition

- 1.9 The application site is located off High Street / High Road (A408), within an existing commercial area, in the north-eastern extents of West Drayton. It is bound to the north and south by existing retail units, to the east by High Street / High Road (A408), and to the west by the Grand Canal and its associated footpath.
- 1.10 The application site is currently unoccupied although previously accommodated a retail store and measures c. 3,066sq.m.
- 1.11 The existing access off High Street / High Road (A408) will remain unaltered following planning permission, alongside the internal delivery and servicing strategy. Further details are provided within the accompanying TS.
- 1.12 The site, its context and relationship with immediate adjoining areas is illustrated in **Appendix B.**

## Travel Plans

- 1.13 Travel planning has the ability to create more sustainable developments, which will assist the development to comply with national, regional and local planning policies.
- 1.14 TPs detail the means by which sustainable travel to / from the site by staff is encouraged.
- 1.15 This may be achieved through the reduction in the number of individual private vehicle trips; and / or the encouragement of public transport, walking and cycling as travel alternatives. Success in this respect will help to mitigate the impact of additional traffic generated by the proposed development, reducing carbon footprint, and encourage travel in a more acceptable way.
- 1.16 The principal objective of the TP is to promote and provide alternative sustainable modes of transport and to ensure staff are fully aware of the sustainable travel options available to them.



## Aims and Scope of Travel Plan

- 1.17 This TP sets out the initiatives and measures to be provided before the development is occupied, in order to influence future staff / visitor travel behaviour at the outset and therefore minimise single occupancy car journeys and encourage staff / visitors to use other sustainable modes of travel.
- 1.18 The main objective of this TP is to consider positive ways and methods by which the impact of the users of the site and the associated vehicle movements can be minimised, and the accessibility improved through the implementation of the TP.
- 1.19 The main aims of this TP are:
- a) To reduce the overall amount of car travel to the site;
  - b) To increase the use of public transport;
  - c) To increase the use of walking and cycling; and
  - d) To minimise the impact of the development on the local area and transport infrastructure.
- 1.20 The structure of the remainder of the report is as follows:
- a) **Section 2:** details the TP context and management structure;
  - b) **Section 3:** provides a site assessment in relation to the walking, cycling and public transport opportunities;
  - c) **Section 4:** provides overarching objectives of this TP;
  - d) **Section 5:** identifies an overview of the TP management and measures;
  - e) **Section 6:** details the Action Plan which sets out the measures and initiatives that will influence the modal shift;
  - f) **Section 7:** identifies the monitoring and review schedule; and
  - g) **Section 8:** sets out the funding of the proposed development and TP.



## 2 Travel Plan Context

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### Introduction

- 2.1 A TP is a long-term management strategy built on a package of site-specific measures that seeks to deliver sustainable transport objectives with an emphasis on reducing reliance on single occupancy car journeys and facilitating travel by sustainable modes which is articulated in a document that is regularly reviewed.
- 2.2 To be successful, it is crucial that the TP is a dynamic process that grows and develops with time. This TP will need to be flexible to allow for changes to be made in line with the performance of the plan, changing circumstances of the site and environment in which it works and to tailor it to the needs of staff and visitors of the site.
- 2.3 The TP is primarily focused at encouraging sustainable travel behaviour to and from the site by staff, whilst visitors may also benefit from certain measures and initiatives detailed later in this report.

### Benefits of a Travel Plan

- 2.4 TPs help to reduce the cost of travel for individuals and reduce the impact of travel on the local highway network as well as the environment. They also help to:
  - a) Inform the design and operation of the development;
  - b) Improve the health of all users on-site through promoting walking and cycling measures;
  - c) Create improvements for public transport, pedestrians and cyclists;
  - d) Reduce reliance on the car through facilitating and promoting sustainable transport initiatives;
  - e) Reduce the cost of travelling to and from the site through promotion of car sharing or alternative travel modes;
  - f) Reduce congestion by minimising car use, thereby reducing local noise pollution and harmful vehicle emissions such as carbon monoxide; and
  - g) Save energy through the reduced use of fossil fuels.
- 2.5 In summary, TPs should identify the specific required outcomes, targets and measures, and set out clear future monitoring and management arrangements all of which should be proportionate. They should also consider what additional measures may be required to offset unacceptable impacts if the targets should not be met.



## Policy

- 2.6 In developing this TP, care has been taken to ensure that full regard has been given to best UK practice methods and these have been applied. Key policy documents (national, regional and local) have been taken into account to help deliver the maximum possible uptake of sustainable transport modes.

### National Policy

- 2.7 The National Planning Policy Framework (NPPF) (July 2021) sets out the principal objective under Section 9: Promoting Sustainable Transport, which is to ensure that 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”* (paragraph 105).
- 2.8 Paragraph 104 of the NPPF further states that transport issues should be considered from the earliest stages so that *“the potential impacts of development on transport networks can be addressed”* and *“opportunities to promote walking, cycling and public transport use are identified and pursued”*.
- 2.9 Paragraph 112 states that development applications must commit to the following:
- a) *‘Give priority first to pedestrians and cycle movements;*
  - 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;*
  - d) *Allow for the effective 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.’*
- 2.10 The NPPF promotes sustainable development and paragraph 113 states that development which generates significant amounts of movement should be required to provide a Travel Plan.
- 2.11 The Government’s planning practice guidance to the NPPF was launched as a web-based resource by the Department for Communities and Local Government (DCLG) in March 2014. The guidance highlights that *“Travel Plans should where possible, be considered in parallel to development proposals and readily integrated into the design and occupation of the new site rather than retrofitted after occupation.”*
- 2.12 The application site has good existing walking, cycling and public transport links (**Section 3**), the use of which will be further enhanced by the development of this TP.





## Local Policy

### WestTrans Travel Plans

2.13 The WestTrans Travel Plans website provides TP guidance for five West London Boroughs, including Hillingdon, of which the site is situated within.

2.14 The WestTrans Travel Plans states that TPs can benefit business in the following ways:

*“Solve issues with parking on and around your site;*

*Cost savings for both the business and the employees;*

*Have a healthier, more punctual, and more productive workforce;*

*Become a more attractive workplace and find/keep the individuals you need; and*

*Improve the company’s image by enhancing your environmental credentials.”*

2.15 The guidance suggests that a TP should contain the following as a *minimum*:

- a) Site description including address, planning reference, location map, and details of the site;
- b) Baseline travel data including survey methodology;
- c) Targets for the site to increase active and sustainable travel;
- d) Action plan showing measures the site will use to achieve their targets. This should include timescales and responsibilities for each measure;
- e) Monitoring and review section stating the TPC contact details (interim details must be provided as a minimum) and the monitoring schedule including methodology (trip rate or iTrace); and
- f) Remedial Action. This explains what more can be tried if the targets are not met at the end of the TP.

## Travel Plan Awards

2.16 WestTrans Travel Plans implements a 3-staged accreditation scheme *“for organisations to demonstrate the commitment it has made to reducing harmful emissions and congestion in West London.”* The stages are as follows:

- a) Stage 1 Bronze – Awarded in receipt of a signed pledge from the organisation to develop a TP in partnership with WestTrans;
- b) Stage 2 Silver – Achieved once TP is developed and, with assistance from WestTrans, have begun to promote sustainable measures and initiatives.
- c) Stage 3 Gold – Awarded to organisations who provide evidence of a shift away from private car use and must maintain the award year on year plus an ongoing and in-depth commitment to bronze and silver standards.



- 2.17 To access the accreditation scheme, a TP must be implemented with WestTrans. Further information is detailed on their website: [travelpans.westtrans.org/guidance/awards-and-recognition/](https://travelpans.westtrans.org/guidance/awards-and-recognition/).
- 2.18 The WestTrans TP Guidance details suggested measures to promote sustainable transport, which are detailed further in **Section 5**, and provide guidance on monitoring, which is detailed further in **Section 7**.

*TfL Travel Plan Guidance*

- 2.19 The WestTrans TP guidance also suggests to review the Transport for London (TfL) TP Guidance.
- 2.20 The TfL guidance ([tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans#on-this-page-1](https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans#on-this-page-1)) will be referenced throughout this TP, and follows similar guidance to WestTrans.

## **Summary**

- 2.21 In summary, the requirement for a TP is recognised within both national and local policy and it is within the context that this TP is prepared.



### 3 Baseline Site Accessibility

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#### Introduction

- 3.1 In order to ensure that the site can operate sustainably in terms of minimising the overall level of daily vehicular trips to and from the site, particularly single-occupancy vehicle trips, it is essential to consider what alternative sustainable travel opportunities are present to enable future employees and visitors to choose to travel by non-car modes, as well as identifying what local services and amenities are located in proximity of the site, which may assist in promoting linked trips.
- 3.2 Although the site is unoccupied, it previously accommodated various retail stores, and is located within 2km of wider retail / commercial areas. Therefore, it can be considered to be sustainably located and so a detailed assessment of facilities for non-car travel is not required. Notwithstanding this, a brief summary of local services, amenities, and infrastructure is provided below.

#### Proximity to Local Services and Amenities

- 3.3 A range of existing services and amenities are located within 1km of the application site, which may be beneficial to existing and future staff during their lunch break. These include:
- a) Tesco Superstore with Costa Coffee;
  - b) Lidl Superstore;
  - c) West Drayton Post Office;
  - d) Aldi Superstore; and
  - e) Takeaways including Sizzler Express, Woody's Takeout, Subway, Kingu Sushi and more.
- 3.4 In addition to the above, it should be noted that there are a number of residential areas within proximity to the site; therefore, the location of the application site also affords an opportunity for future staff and visitors to travel to the site by modes other than private car.



## Walking and Cycling

### *Guidance*

- 3.5 Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car journeys, particularly those under 2km. This is also supported by the 2019 National Travel Survey (NTS) which found that 80% of trips under 1 mile (1.6-kilometres) are undertaken on foot. It should be noted that the NTS for 2020 which was undertaken during the COVID-19 pandemic had less than half the response rate and experienced substantial missing data, the highway conditions could not be classed as 'normal' which is likely to have impacted on how people travel. However, the 2020 NTS journeys on foot under a mile is validated by the 2021 NTS, released in August 2022, and demonstrates a 2-percentage point increase in journeys by foot under a mile since 2019.
- 3.6 The NTS results detailed above are supported by the definition of a 'walkable neighbourhood' within Manual for Streets whereby facilities required on a day-to-day basis should ideally be located within an 800m walk distance. It also states however that there is not an upper limit and PPG13, whilst although now superseded, continues to set the benchmark in defining that 2km is an appropriate distance that occupiers or visitors to a site could be reasonably expected to walk to access a particular service or amenity
- 3.7 However, due to COVID-19 the 2020 NTS had less than half the response rate and experienced substantial missing data, the highway conditions could not be classed as 'normal' which is likely to have impacted on how people travel. NTS therefore state that the 2020 NTS should be interpreted with caution.
- 3.8 The 2019 NTS results detailed above are supported by the definition of a 'walkable neighbourhood' within Manual for Streets whereby facilities required on a day-to-day basis should ideally be located within an 800m walk distance. It also states however that there is not an upper limit and PPG13, whilst although now superseded, continues to set the benchmark in defining that 2km is an appropriate distance that occupiers or visitors to a site could be reasonably expected to walk to access a particular service or amenity.
- 3.9 The site benefits from being within 2km walking distance of several residential areas such as Cowley (1.5km), Drayton Garden Village (2km), and West Drayton (2km). Within 2km, staff and visitors may also access the High Street / High Road (A408), several bus stops, West Drayton Train Station, post office, takeaways and restaurants, superstores (Tesco, Aldi, Lidl), and other amenities.
- 3.10 Cycling also has the potential to substitute for short car trips, further facilitating sustainable travel.



- 3.11 Whilst the NTS 2019 (Table NTS0306) notes that the average cycle trip is approximately 3.5 miles (5.6km), the Local Transport Note 1/04: Policy, Planning and Design for Walking and Cycling (page 15), produced by the Department for Transport (DfT) indicates that journeys three times the average distance are not uncommon for regular commuters. The growth of electric bikes is also increasing the propensity to cycle and reducing journey times.
- 3.12 The site is within a comfortable catchment of up to 5km to a range of residential estates / areas and, therefore, it is anticipated that both employees and visitors will be able to both walk and cycle to / from the site.

#### *Infrastructure*

- 3.13 The application site benefits from a good level of permeability to the surrounding pedestrian footway network, with footways linking from the proposed Home Bargains Store to the existing footway provision along High Road (A408).
- 3.14 High Road (A408) benefits from illuminated, surfaced c. 2m wide footway provision on the either side of the carriageway – which increases in width to c.3.5m wide along a section of the road.
- 3.15 In addition to the above, the local highway network is of suitable geometry and speed limit for cyclists to travel along the carriageway adjacent to vehicular traffic, without detriment to highway safety. Cycle lanes are provided to the High Road (A408) / Chantry Close signalised junction.

#### **Public Transport**

- 3.16 The nearest northbound bus stop is the 'Moorland Road (Stop C) located approximately 200m north of the site access along High Road (A408). The stop benefits from a shelter with seating, printed timetable information, flag and pole, raised-kerb and on-carriageway markings. This stop serves the 222 service to Uxbridge.
- 3.17 The nearest southbound bus stop is the Philpots Bridge (Stop T) located approximately 30m north of the site access along High Road (A408). The stop benefits from a shelter with seating, printed timetable information, flag and pole, raised-kerb and on-carriageway markings. This stop serves the 222 service to Hounslow.
- 3.18 The 222 bus service operates seven days a week, 24 hours a day. A summary of the existing bus services operating from the stops detailed above is provided below in **Table 3.1**, whilst full timetable information is provided on TfL website: <https://tfl.gov.uk/travel-information/timetables/>.



Service No.	Route	Days of Operation	Service Summary		
			First Service	Frequency	Last Service
222	Uxbridge - Hounslow	Mon – Fri	00:04	Every 20-30 minutes between 00:00 – 05:30. Every 8-12 minutes between 05:00 – 23:59.	23:52
		Sat	00:04	Every 20-30 minutes between 00:00 – 08:00. Every 9-13 minutes between 08:00 – 23:59.	23:52
		Sun	00:03	Every 20-30 minutes between 00:00 – 09:00. Every 8-12 minutes between 09:00 – 23:59.	23:51
	Hounslow - Uxbridge	Mon – Fri	00:00	Every 20-30 minutes between 00:00 – 06:00. Every 7-10 minutes between 06:00 – 08:00. Every 10 – 12 minutes between 08:00 – 23:59	23:48
		Sat	00:00	Every 20-30 minutes between 00:00 – 08:00. Every 10 – 12 minutes between 08:00 – 23:59	23:48
		Sun	00:00	Every 20-30 minutes between 00:00 – 08:00. Every 11 – 13 minutes between 08:00 – 23:59	23:48

**Table 3.1:** Bus Services and Frequencies

(source: information taken from [www.tfl.com](http://www.tfl.com) June 2023)

3.19 As detailed above in **Table 3.1**, the application site benefits from regular local bus services that operate throughout the week and the weekend, 24 hours a day, between the application site, Uxbridge and Hounslow.

3.20 Furthermore, given the operational periods of the services, it is considered that future staff and visitors may be able to utilise public transport in favour of private car journeys when travelling to / from the application site.

#### Rail

3.21 West Drayton Train Station is located approximately 1km south of the site and can be accessed via an 11-minute walk, 5-minute cycle, or via the 222-bus service with a journey time of 7-minutes.

3.22 The train station serves the Elizabeth Line, which operates between Reading and London, seven days a week. Further information is provided in **Appendix C**, which illustrates a local public transport map.



### Summary

- 3.23 The site is determined to be sustainably located with accessibility to a wide range of local services and amenities to promote linked trips, supported by local public transport services. Future employees and visitors will therefore be presented with a range of suitable travel choices to access the site and will be able to link trips with other existing retail offerings within the vicinity of the site.

## 4 Aims and Objectives

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### Introduction

- 4.1 It is important that the TP has a focus and direction in what it is trying to achieve. This can be accomplished through the identification of objectives, which are realistic and site specific.
- 4.2 It is essential that there is an agreed set of objectives that can be adopted and thereby influence all actions arising from the TP. The following objectives are informed by best practice guidance but also reflect local circumstances and stakeholder requirements.

### Objectives

- 4.3 The four main objectives of this TP is set out below:
  - a) To achieve a high awareness of the sustainable travel options available amongst staff and visitors, which is to be maintained during the build-up of the site. It is vitally important that the users of the development are made fully aware of the sustainable transport choices available to them from the opening of the site so that sustainable travel habits are established from the outset;
  - b) To increase the health of all users of the site by increasing the proportion of active travel (i.e. walking and cycling). Current Government advice for living a healthier lifestyle is to engage in moderate exercise (that raises your breathing and heart rate) for 30 minutes a day;
  - c) To encourage less reliance on the car, wherever practical, particularly for single occupancy car journeys. The measures set out in this TP not only encourage and facilitate pedestrian and cycle use, but also make better use of the car through initiatives such as car sharing; and
  - d) Engage staff in critical thinking regarding their travel choices.
- 4.4 These objectives will be implemented through a package of measures that are discussed at **Section 5**.

### Travel Surveys

- 4.5 In accordance with WestTrans Travel Plans guidance, two monitoring methods are suggested – iTrace Compliant method or Trip Rate method. For these development proposals, it is suggested that the iTrace method will be used.

#### iTrace

- 4.6 The WestTrans Travel Plan website details the methodology of the iTrace Compliant method. A summary is provided below.





- 4.7 A survey will be provided by the TP Monitoring Officer, and managed utilising the iTrace software. It is advised that incentives and reminders are to be used to ensure that an acceptable response rate is achieved. A minimum survey period of 2 weeks should be provided.
- 4.8 An audit questionnaire is required to be completed to provided information about the site.
- 4.9 The audit questionnaire and survey responses will be submitted to WestTrans, once an appropriate number of responses have been received.
- 4.10 Once WestTrans have approved the results, a survey monitoring report will be submitted to WestTrans for review.
- 4.11 Undertaking the surveys will be the responsibility of the Travel Plan Co-ordinator (TPC). The TPC will be upload the results onto the iTrace system within six weeks of the surveys taking place.
- 4.12 An example travel survey has been provided at **Appendix D**.

### **Modal Shift Targets**

- 4.13 Targets enable progress to be measured against aims and objectives and will be challenging to ensure continual improvement in managing development travel demand. The TP will need to be monitored to ensure it is still relevant, up-to-date and influencing sustainable travel use on the site, which is discussed in **Section 7**.
- 4.14 The introduction of a range of measures to support sustainable travel in favour of travel by private car, in particular single occupancy car journeys, will result in modal shift.
- 4.15 Targets for the scale of modal shift against which the success of the TP can be measured will accord with the following SMART principles:
  - a) **Specific** (identify what is to be achieved);
  - b) **Measurable** (over the target period);
  - c) **Achievable** (linked to overall objectives and aims);
  - d) **Realistic** (must be achievable over time allocated); and
  - e) **Time-bound** (a defined action plan including dates for achievement).
- 4.16 Accurate modal split targets will be identified once the baseline travel survey has been undertaken, within six months of completion. Initial modal split targets have been set based on Census 2011 travel to work data for the Workplace Zone Hillingdon 022, within which the site is contained.



4.17 Initial modal shift targets are based on DfT guidance of a 10% modal shift from car trips to more sustainable modes, such as public transport, cycling and walking. A target of 10% is considered feasible considering the measures in place, set out in **Section 5** together with the sustainable location of the site. **Table 4.1** sets out initial modal split targets based on a 10% reduction in single occupancy car journeys.

Mode of Travel	Baseline/ Year 1 (%)	Year 2 Target (%)	Year 3 Target (%)	Year 4 Target (%)	Year 5 Target (%)
Driving a car or van	67.8	66.1	64.4	62.7	61.0
Car Passenger	4.2	4.5	4.7	4.9	5.2
Train	3.5	3.6	3.8	4.0	4.2
Bus / Coach	9.7	10.2	10.7	11.2	11.8
On Foot	9.2	9.8	10.3	10.8	11.3
Bicycle	1.6	1.7	1.8	1.8	1.9
Taxi	0.3	0.3	0.3	0.3	0.3
Metro / Underground / Tram	2.6	2.8	2.9	3.1	3.2
Motorbike / Moped	0.9	0.9	0.9	0.9	0.9
Other	0.3	0.3	0.3	0.3	0.3
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

**Table 4.1: Percentage Modal Shift Targets based on 2011 Census Data (Hillingdon 022)**

- 4.18 Whilst the targets have potential to change once the site is occupied, they are able to broadly set out what is able to be achieved as a result of implementing the TP. It is proposed that the above targets should be achieved over a five-year time period from the completion of the site.
- 4.19 It is not considered appropriate to set specific targets for customers, other than to encourage customers to travel sustainably.



## 5 Travel Plan Management and Measures

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### Management

- 5.1 The TP will be registered on the online travel plan management system iTrace. This system permits the effective implementation by allowing the TP data to be uploaded and managed while allowing the WestTrans to approve, support and monitor the scheme.
- 5.2 The iTrace system will be used for the duration of the TP from registration and approval, through to implementation and monitoring of the scheme.

### Travel Plan Co-ordinator

- 5.3 The key to any effective TP is to have an identified person responsible for its operation and monitoring. In order for the TP to be effective and responsive, it must be kept up to date and relevant, otherwise it may become ineffective.
- 5.4 In order to maintain and develop the TP, it is important to designate a member of staff from the site to be the TPC. The TP will be managed and monitored by the TPC who will work to deliver the content of this TP and ensure the measures are carried out effectively.
- 5.5 It will be the responsibility of the developer to ensure the appointment and funding of a suitably qualified person to perform the role of the TPC. They will be appointed three months prior to opening of the development and their role will be ongoing for a period of five years, following the opening of the development.
- 5.6 In the interim, Rappor will be appointed as the TPC until a member of staff is available to be allocated as the permanent TPC. The contact details for Rappor are below:

Rappor Ltd

CTP House, Knapp Road, Cheltenham, Gloucestershire, GL50 3QQ

E-mail: [TPC@rappor.co.uk](mailto:TPC@rappor.co.uk)

Phone: 01242 525 696

- 5.7 The responsibilities of the TPC will include the following, in accordance with WestTrans guidance:
  - a) Being the point of contact for TP related queries;
  - b) Ensuring the TP Monitoring is undertaken at appropriate times, in line with the TP; and
  - c) Ensuring measures in the action plan are implemented to encourage active and sustainable travel to and from the site, such as installing cycle parking or promoting active travel events.



## Marketing and Promotion

- 5.8 The TPC will be responsible for marketing and promotion of the TP and sustainable travel opportunities and benefits and will establish communication between those who are responsible for delivery and those who benefit from the implementation of the TP.
- 5.9 The provision of information to staff, which is both accessible and available in varied formats, is an important measure of the TP.
- 5.10 This would be achieved through a co-ordinated marketing and communications strategy including information within a notice board within the staff area, and Travel Information Pack (TIP) for staff on commencement of their employment.

## Travel Plan Measures

- 5.11 The TP is effectively a set of measures, directed at staff and visitors and intended to maximise sustainable travel for journeys to / from the site. The proposed TP measures focus on maximising the site's accessibility and sustainability as part of the development proposals.

### Physical (Hard Measures)

- 5.12 The WestTrans TP guidance sets out six physical measures to implement on site, which are summarised below:
  - a) Attractive cycle parking;
    - secure (e.g. locked area, passive surveillance, or CCTV)
    - convenient (close to entrances, no stairs nor lift, no outwards opening door, sufficient space between stands, stand shape allowing to secure both wheels)
    - covered where possible
    - well-lit
    - in sufficient numbers (supply always slightly higher than demand)
  - b) Shower / drying / changing / locker facilities;
  - c) Electric vehicle charging points (possibly also compatible with electric bikes) and dedicated parking spaces;
  - d) Reduce the overall number of car parking spaces (excluding disabled parking spaces);
  - e) Clear signage to all travel related facilities; and
  - f) Dedicated and direct walking/cycling paths to entrances on the site. These should also be well-lit and made safer with ramps where necessary.



## Soft Measures

### *Welcome Travel Information Packs*

5.13 In accordance with WestTrans guidance, a TIP will be created and distributed to all staff on commencement of their employment. The TIP will include various travel information, with the intention of encouraging staff to engage with sustainable transport modes. The TIP will contain the following:

- a) A cycle / pedestrian route map;
- b) Contact details of the TPC;
- c) Details of nearby bus stops and the most recent bus timetables;
- d) Details of public transport fares and operators;
- e) Benefits of car sharing; and
- f) Links to relevant sustainable travel apps.

5.14 The TPC will keep the TIP up-to-date to reflect changes, for example when revised bus timetables are issued.

### *Travel Noticeboard*

5.15 In accordance with WestTrans TP guidance, an up-to-date noticeboard will be provided in staff areas, which will promote walking and cycling measures and events, provide bus and rail information etc.

### *Walking / Cycling Measures*

5.16 All pedestrian and cyclist infrastructure included as part of the development will be completed to a high standard. Details of the health benefits of walking, will be included in the TIP.

5.17 The TPC will be responsible for promoting events such as National Bike Week and European Mobility Week to encourage staff to cycle.

5.18 Lockers and sufficient changing space will be provided.

5.19 The TPC will explore opportunities to become a member of the London Cycling Campaign, which encourages cycling amongst staff. The membership can include training workshops, safety check sessions, training days, and active travel guidance days. More information is provided on their website, available here: <https://lcc.org.uk/services/workplace-membership/>.

5.20 The TIP will contain information that will actively promote the use of bicycles as a regular and reliable transport mode and illustrate the physical health benefits of regular exercise to all site users.

5.21 The Cycle to Work scheme will be offered to all staff and details will be provided within the TIP.



5.22 Secure cycle parking will be provided at the development as shown on the site layout at **Appendix E**.

5.23 Furthermore, staff will be made aware of walking and cycling initiatives they can get involved with, such as [www.livingstreets.org.uk](http://www.livingstreets.org.uk), [www.sustrans.org.uk](http://www.sustrans.org.uk) and <https://www.hillingdon.gov.uk/cycling>.

#### *Public Transport Measures*

5.24 Good public transport provision is important to achieving sustainable transport targets. By encouraging staff to use existing bus services and rail services, additional revenue will be generated, and the quality of services could improve and also allow 'at risk' services to be maintained.

5.25 The use of public transport will be promoted through the TIP. This will include information on local bus routes, timetables and location of stops.

5.26 Public transport use will be encouraged by the introduction / promotion of the following measures by the TPC:

- a) Provision of current information on bus/rail routes, bus /rail times and location of bus stops and train stations;
- b) Provision of information on tickets;
- c) Promotion of local bus services and rail services as attractive access options; and
- d) Regular review of any changes to timetables, routes or fares.

#### *Car Measures*

5.27 The most unsustainable mode of transport is single occupancy car travel. Car sharing can result in considerable cost savings and other benefits. Car sharing not only reduces an individual's transport costs, by fuel costs being shared, but also reduces the number of cars on the roads and reduces the need for a private car.

5.28 In accordance with WestTrans TP guidance, staff will be made aware of car sharing websites such as liftshare.com and co-cars.co.uk, which are free to access and help to facilitate car-sharing amongst anyone that lives in the surrounding area. The scheme can benefit anyone who regularly commutes to work by trip matching drivers, pedestrians, cyclists and taxi users.

5.29 As suggested by WestTrans TP guidance, the use of FAXI will be explored by the TPC. FAXI allows employees to mark on a map their location. From this, employees are able to organise car sharing between them. Further details are provided here: <https://www.kinto-join.co.uk>.



- 5.30 The TPC will ensure that all staff are advised of the financial savings, which can be achieved through car sharing and will ensure that all staff are provided with details of the car share scheme.

*Personal Journey Planning*

- 5.31 Personal journey planning will be offered to each staff member. It will be the responsibility of the TPC to provide relevant information to staff members.
- 5.32 The offer of personal journey planning will be advertised in the TIP and on the noticeboard.

*Sustainable Travel Reward System*

- 5.33 In accordance with WestTrans TP guidance, the TPC will investigate the possibility to run a monthly prize draw that will be offered to staff, subject to conditions set out the by TPC. This will aim to encourage staff to travel sustainably. An example of a 'condition' could be those who have walked to work 3 days a week can be entered into the draw.



## 6 Travel Plan Action Plan

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### Introduction

- 6.1 Key to the success of the TP is the identification of viable transport alternatives and these can be identified through the Action Plan. This is the package of site-specific measures that will encourage a shift away from single occupancy car use and increase accessibility to and from the site.
- 6.2 This section outlines measures that will be implemented as part of this TP. These measures will include making best use of the current facilities, as well as creating further incentive for staff use sustainable transport modes of travel. The implementation of the TP and the measures contained within it will be flexible.

### Action Plan

- 6.3 A comprehensive set of initiatives and measures is set out on the following pages. The recommended measures have been drawn from best practice, Travel Plan guidance and case studies throughout the UK.
- 6.4 The Action Plan has been broken down into four main strategy sections relating to the scope of the TP, which comprise the following:-
  - a) Walking and cycling strategy;
  - b) Public transport strategy;
  - c) Car user strategy; and
  - d) Additional TP support measures.
- 6.5 The measures and initiatives identified in the strategy section aim to directly influence staff of the site. Furthermore, some of the measures have an influence on visitor trips to the site, and where this is the case, this has been identified in each strategy section.
- 6.6 Measures contained within the Action Plan also indicate where the responsibility lies in relation to each measure, timeframe and estimated costs.





## Walking and Cycling Strategy

	Measure	Action	Staff	Visitors	Timeframe	Cost	Responsibility
WC1	<b>Implement cycle parking facilities</b>	The quantum of cycle parking is in line with local planning guidance. Cycle parking will be secure, well-lit and in a convenient location	✓	✓	During construction phase	As part of build costs	Developer
WC2	<b>Implement on-site pedestrian facilities</b>	New pedestrian facilities to be provided within the site	✓	✓	During construction phase	Part of construction costs	Developer
WC3	<b>Walking and Cycling Route Maps to Facilities</b>	Walking and cycling route maps will be available on noticeboards and within the TIP	✓	✓	Prior to completion / updated bi-annually	Designer's time and printing costs - TBC	TPC
WC4	<b>Promotion of Walking and Cycling Events / Websites</b>	Promotion of events such as 'Walk to Work Week' and websites such as <a href="http://livingstreets.org.uk">livingstreets.org.uk</a> , <a href="http://sustrans.org.uk">sustrans.org.uk</a> and London Cycling Campaign	✓		Ongoing for the lifetime of the TP	TPC's Time	TPC
WC5	<b>Promote Cycle to Work Schemes</b>	All staff will have access to the Government's Cycle to Work Scheme that provides a financial incentive for staff to cycle (tax discounts on cycles and equipment).	✓		Ongoing for the lifetime of the TP	TPC 's Time	TPC
WC6	<b>Provide cycle and walking facilities</b>	Provide lockers changing facilities	✓		During construction phase	Part of construction costs	Developer

**Table 6.1: Walking and Cycling Action Plan**



## Public Transport Strategy

	Measure	Action	Staff	Visitors	Timeframe	Cost	Responsibility
PT1	Promotion of Bus and Rail Services	Up to date bus and rail information to be provided to staff and visitors in the TIP	✓	✓	Prior to completion / updated bi-annually for the lifetime of the TP	Designer's time and printing costs	TPC
PT2	Promotion of Travel Apps	Public transport apps will be promoted as part of personalised journey planning in the TIP	✓		Prior to completion / for the lifetime of the TP	Designer's time and printing costs	TPC

Table 6.2: Public Transport Action Plan

## Car User Strategy

	Measure	Action	Staff	Visitors	Timeframe	Cost	Responsibility
CU1	Promoting Car Sharing Websites	Information included in the TIP and online with details on car sharing	✓	✓	Ongoing for the lifetime of the TP	TPC's Time	TPC

Table 6.3: Car User Action Plan



## Travel Plan Support Measures

	Measure	Action	Staff	Visitors	Timeframe	Cost	Responsibility
TP1	Appoint a TPC	A TPC to be appointed for the lifetime of the time	✓	✓	Prior to completion	TBC	Developer
TP2	TIP	A TIP is to be created and distributed to staff upon commencement of employment	✓		Prior to completion / updated bi-annually for lifetime of the TP	Designer's time and printing costs - TBC	TPC
TP3	Provide a noticeboard	Provide a travel noticeboard within the staff areas to promote sustainable transport	✓		Upon completion and updated monthly by the TPC	TPC's Time	TPC
TP4	Personal Journey Planning	Offer personal journey planning to each staff member to promote sustainable travel	✓		Upon completion will be offered to each new staff member	TPC's Time	TPC

**Table 6.4: Additional Support Action Plan**

## 7 Monitoring and Review

- 7.1 An effective monitoring and review process is important to establish how successful the TP has proved to be. Monitoring involves collecting data and information, and the review process involves the consideration of these details to determine whether or not the TP targets have been met.
- 7.2 As set out in **Section 5**, the TPC will be appointed three months prior to completion of the proposed development and will liaise with the relevant officers at WestTrans. The TP will be actively managed and monitored by the TPC for a period of five-years, following completion of the development.
- 7.3 Based on the monitoring and review process, it will then be necessary for the TPC, in conjunction with WestTrans, to decide what, if any, amendments are required to the TP. As part of the monitoring process, it is important to establish the baseline conditions.

### Travel Plan Monitoring

- 7.4 For the on-going management of the TP to be successful and to deliver the desired outcomes, it is important that the parties involved in the delivery of the TP, which means the Developer / TPC and WestTrans, work effectively in partnership to achieve the desired results.
- 7.5 Monitoring of travel patterns over time, to ascertain whether the initiatives of the TP are proving successful and whether there has been a shift to more sustainable modes of transport, requires on-going travel surveys to be undertaken.
- 7.6 A baseline staff travel survey will be undertaken within six months of completion of the development (Year 1). Follow up monitoring surveys will then be conducted in Year 3 and 5 thereafter, as shown in **Table 7.1**. The results of the initial surveys will be used to inform targets, objectives and measures and the monitoring surveys will be used to assess the progress of the TP against the objectives and targets.

	Year 1	Year 2	Year 3	Year 5	Year 5
Travel Survey	✓		✓		✓

**Table 7.1: Programme of Surveys**



- 7.7 The online iTrace system will be used to monitor the performance of the TP throughout the monitoring period. Monitoring updates and survey results will be uploaded to iTrace within six weeks of the survey results, in accordance with WestTrans Travel Plan guidance. This will demonstrate how the TP has been implemented for the year.

### **Remedial Action**

- 7.8 In the event that the TP is shown to be underachieving a remedial strategy needs to be outlined, which considers measures to help get the TP 'back on track'. Remedial measures are intended to achieve modal shift and mitigate the impact of any under achievement in meeting targets.
- 7.9 A set of potential remedial measures, to be triggered in the event that measures mentioned above fail to meet the required TP targets, could include the following:
- i) More active marketing and promotion of sustainable travel information;
  - ii) Encourage use of car sharing through further promotion; and
  - iii) Liaise with WestTrans and bus operators on a potential bus voucher scheme for staff.
- 7.10 The remedial measures are different to the TP measures, and the exact nature of what, if any, remedial measures are required will be identified through the monitoring and review process in conjunction with WestTrans Travel Plan Monitoring Officer.



## 8 Funding

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- 8.1 Infrastructure for the proposed development, including the on-site pedestrian / cycle facilities, will be secured through appropriate mechanisms within the planning process.
- 8.2 The funding of all aspects of the TP, including the introduction of measures, employing of TPC, monitoring and reporting will be the responsibility of the developer. This responsibility will be maintained for the full life of the TP.
- 8.3 As stated in the pre-application response, *“as surety that the Travel Plan will be implemented and targets achieved, the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This would be secured by way of a Section 106 agreement. If the Travel Plan is successful the bond will be returned.”*



## Appendix A – Pre-Application Response



Will Tucker  
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London  
W1D 3QP

Planning Applications Team  
Hillingdon Council  
Civic Centre, High Street  
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Tel: 01895 250230

Case Officer: Michael Briginshaw

Email: mbriginshaw1@hillington.gov.uk

Date: 26th May 2023

Our Ref: 68663/PRC/2023/53

Dear Will Tucker

**RE:** Refurbishment of existing retail unit (Class E) including installation of new shopfront, reconfiguration of car park, landscaping and associated works

**SITE:** 217 High Street Yiewsley

I refer to your request for pre-application planning advice dated 3rd April 2023 and our subsequent meeting on 5th May 2023 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration.

**Plan Numbers:**

101 Rev. A - received 22 Mar 2023

102 Rev. A - received 22 Mar 2023

WT/AF/TR/Q230135 Pre-Application Letter (Dated 22nd March 2023) - received 22 Mar 2023

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

**The Site and Surrounds**

The site is situated to the West of Yiewsley High Street / High Road (A408), measures approximately 1.2 hectares, and comprises a retail warehouse (2,972m<sup>2</sup> floorspace) with a car park (159 no. car parking spaces) and delivery access fronting the site. The site was formerly occupied by the B&M retail store and a garden centre (Use Class E) and a vehicle service and MOT centre (Use Class B2).



The site is situated approximately 200m North of Yiewsley/West Drayton Town Centre and 800m North of the West Drayton Railway Station, a Crossrail Station soon to be part of the forthcoming Elizabeth Line. The site is also located within the Heathrow Opportunity Area.

The site is bound by the River Pinn to the North and the Grand Union Canal to the West. Beyond this, large scaled light industrial and commercial uses are located to the North and South, including Pets at Home and Argos to the North and Tesco Superstore to the South. The Grade II Listed Hillingdon Manor Grange and a Barn at Philpotts Yard are located to the East and residential properties are located in between. Residential properties are also located to the West across the Grand Union Canal.

The Environment Agency (EA) Flood Zone map shows that most of the site is in Flood Zone 2. Smaller sections of the site along the northern boundary are located within Flood Zone 3. The site also forms part of the Hillingdon Air Quality Management Area, Yiewsley Air Quality Focus Area and Colne Valley Archaeological Priority Zone. The site is subject to potentially contaminated land.

## SITE PLANNING HISTORY

The retail unit was constructed under planning permission reference 41515B/93/606, dated 5th January 1995, which consented the erection of a D.I.Y. store and garden centre with associated parking and landscaping, construction of a vehicular access and kerb realignment (involving demolition of existing building). This was granted permission subject to following conditions:

- Condition 20 restricted the use of the premises to a DIY store only;
- Condition 21 restricted deliveries to 0800 to 1800 hours Monday to Friday; 0800 to 1300 hours on Saturdays and at no time on Sundays and Bank Holidays;
- Condition 22 limited the occupation of the development for a period of 5 years following completion to a specific retailer only (Great Mills (Retail) Limited).

A Section 73 (S73) application ref. 41515T/96/1111 to vary the goods restriction (Condition 20) of the original permission was approved on 2nd October 1996. As such, the goods restriction for the retail unit is currently controlled by Condition 1 of the 1996 consent which states:

'The premises shall only be used for the sale of non-food bulky goods and for no other purposes, including any other use within Class A1 of the schedule to the Town and Country Planning (Use Classes) Order 1987'.

The reason for imposing this condition was to protect the vitality of the adjoining town centre.

A further Section 73 application ref. 41515W/96/1778 was approved on 6th August 1997 to remove Condition 22 of the original consent, which restricted the occupation of the unit to a specific retailer for a period of 5 years following completion of the development.

Application ref. 68663/APP/2012/1706 permitted the variation of Condition 1 (restricted sale of goods) of Planning Permission Ref. 41515T/96/1111, dated 2 October 1996, to allow the sale of additional non-food goods and ancillary sale of food and drink (Class A1). Condition 3 states:

"The premises shall only be used for the sale of bulky and non bulky comparison goods. In addition, food and drink goods may be sold from an area not exceeding 240 square metres, of which not more than 24 square metres will be dedicated to perishable food and drink products.

The premises shall be used for no other purposes including any other use within Class A1 of the schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended). The total sales area of the unit shall not exceed 2,393 square metres."

In granting permission the original s106 agreement was varied through the deletion of the clause preventing the sale of food.

Most recently, an appeal (ref. APP/R5510/W/21//3279371) was dismissed in January 2022, following the refusal of application ref. 68663/APP/2020/705 (dated March 2021) which sought permission for the erection of 5 and 6 storey buildings to provide a Health Facility (approximately 10,000sqft) (Use Class E) and 233 residential apartments with associated parking, communal podium garden, landscaping, pedestrian and cycle canal link and external works following the demolition of the existing buildings. The appeal was dismissed as the benefits of the proposal did not outweigh the failure to meet the sequential test and the harm that would result from placing new development at risk of flooding.

## **The Proposal**

This pre-application seeks advice on a proposal for the refurbishment of the existing retail unit (Class E) including installation of new shopfront, reconfiguration of car park, landscaping and associated works. No new floorspace is proposed but the proposals would extend the quantum of floorspace that can be used for the sale of food and drink products from 240 square metres to 892 square metres, an increase of 652 square metres.

## **Planning Policy**

### **Development Plan**

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

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

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

### **Material Considerations**

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

### **Part 1 Policies:**

PT1.BE1	(2012) Built Environment
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM3	(2012) Blue Ribbon Network
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.HE1	(2012) Heritage

### **Other Policies:**

DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation

DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 2	Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D4	(2021) Delivering good design
LPP D8	(2021) Public realm
LPP G1	(2021) Green infrastructure
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI17	(2021) Protecting and enhancing London's waterways
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.3	(2021) Retail parking

LPP T7	(2021) Deliveries, servicing and construction
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF3	NPPF 2021 - Plan Making
NPPF4	NPPF 2021 - Decision-Making
NPPF6	NPPF 2021 - Building a strong, competitive economy
NPPF7	NPPF 2021 - Ensuring the vitality of town centres
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment

## Main Planning Issues

### 1. Principle of development

#### LAND USE

The site was formerly occupied by the B&M retail store and a garden centre (Use Class E), with a vehicle service and MOT centre (Use Class B2) located to the rear (outside the red line boundary). The proposal would refurbish the existing retail unit (Class E), install a new shopfront, and reconfigure the car park. The use class is not therefore proposed to change.

#### RETAIL IMPACT & SEQUENTIAL TEST

Paragraph 90 of the NPPF (2021) states that applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, require an impact assessment if the development is over 2,500m<sup>2</sup> of gross floorspace. This should include assessment of:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Policy SD7 of the London Plan (2021) states:

A) When considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A1 - A3, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices). Boroughs should:

- 1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused.

2) require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused.

3) realise the full potential of existing out-of-centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location unless the proposal is in accordance with the Development Plan or can be justified through the sequential test and impact assessment requirements in Parts A(1) and A(2) above.

Policy DMTC 1 of the Hillingdon Local Plan: Part 2 (2020) states:

C) Proposals for 'main town centre uses' in out of centre locations will only be permitted where there is no harm to residential amenity.

D) The Council will:

i) expect proposals for 'main town centre uses' to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach; and

ii) consider the effect of the proposal, either individually or cumulatively on the vitality and viability of existing town centres. Development proposals in out of centre and edge of centre locations, which exceed 200 sqm of gross retail floorspace, or 1,000 sqm of combined main town centres uses, will require an impact assessment.

The proposal includes the amendment of an existing restriction on the sale of food and drink. The sale of these goods is currently restricted to 240 sqm, of which not more than 24 sqm can be dedicated to perishable food and drink products. The applicant confirmed during the meeting that:

- There is a desire to increase the sale of food and drink floorspace to 892 sqm.

- The perishable food and drink would also increase to 89 sqm.

- There was no foreseeable reason to object to a condition ensuring the 892 sqm could not be sublet by a food and drink retailer, although this would need to be checked by the agent's client before confirmation.

Points of Agreement:

The uplift in the amount of floorspace that could be used to sell food and drink is deemed to be significant. Both parties agree that both a sequential test and retail impact assessment would be expected as part of a future planning application. The Council highlighted that, whilst we can provide some general comments on methodology, the sequential test and retail impact assessment would be reviewed by a third party to determine the availability of alternative sources and the harm that may arise towards the town centre. Noting this, the following basic points were agreed only:

- The catchment area for the sequential test and retail impact assessment should be the town centre (and its edge of centre) of Yiewsley & West Drayton only.

- In terms of the impact assessment, it is logical to measure any harm arising from the net difference, noting that the food and drink floorspace would be replacing floorspace used to sell bulky goods outside of a town centre.

## Points of Difference:

The following points of difference were also picked up by the Council and deemed important to bring to the attention of the applicant:

- The site should not be considered edge of centre. The definition within the NPPF (2021) outlines that for retail purposes, edge of centre is up to 300 metres from the primary shopping area. The site does not meet this definition.
- The Council is also aware of retail units that operate a floor area over two storeys e.g. Asda, Hayes. It is therefore considered that this should not be used as a default exclusionary condition within the sequential test.
- On the basis that a refurbishment of the building is required, it is reasonable to also include other buildings that could be converted to retail as part of the sequential test.

As noted above, a sequential test and retail impact assessment would be reviewed by a third party. As discussed during the meeting, it would be pertinent for the full methodology to be agreed prior to conducting both tests so that any further points of difference can be rectified prior to submission.

## FLOOD RISK AND SEQUENTIAL TEST

The Environment Agency (EA) Flood Zone map shows that most of the site is located within Flood Zone 2. Smaller sections of the site along the northern boundary are also located within Flood Zone 3. Accordingly, Chapter 14 of the National Planning Policy Framework (NPPF) (2021) is considered. Paragraph 159 of the NPPF (2021) 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). Paragraph 161 states that all plans should apply a sequential risk-based approach to the location of development and paragraph 162 states 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.

The area of the site which adjoins the River Pinn should be used for flood attenuation as there are considerable reported flooding problems up-stream and it is known that the lack of maintenance of the River Pinn in this particular location is the cause of the flooding. It should be investigated at this stage where the applicants site boundary lies, and if the land lies outside of the applicants ownership, a contribution will be required to deliver maintenance and flood alleviation works.

## ECONOMIC IMPACT

As the development is not a comprehensive redevelopment of the entire site, noting the exclusion of the vehicle service and MOT centre (Use Class B2) to the rear (outside the red line boundary), care should be taken to design a scheme which would not compromise access to and therefore sterilise the adjoining site. For example, the existing unlawful car parking adjoining the River Pinn and access road which is proposed to be formalised would increase the conflict between users of both sites. Alongside the adverse impacts posed to the River Pinn, the parking here should instead be used for flood mitigation.

### 2. Design

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

- A) All development will be required to be designed to the highest standards and, incorporate principles of good design including:
- i) harmonising with the local context by taking into account the surrounding:
    - scale of development, considering the height, mass and bulk of adjacent structures;

- building plot sizes and widths, plot coverage and established street patterns;
  - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
  - architectural composition and quality of detailing;
  - local topography, views both from and to the site; and
  - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The above policies are supported by Policies BE 1 of the Hillingdon Local Plan: Part 1 (2012).

Policy DMEI 8 of the Hillingdon Local Plan: Part 2 (2020) states:

- A) Development on sites that adjoin or include a watercourse should:
- i) have regard to the relevant provisions of the Thames River Basin Management Plan and any other relevant Catchment Management Plans;
  - ii) not extend within 8 metres of the top of the bank of a main river or 5 metres either side of an ordinary watercourse or an appropriate width as may be agreed by the Council;
  - iii) where feasible, secure the implementation of environmental enhancements to open sections of river or watercourse; and
  - iv) where feasible, implement a scheme for restoring culverted sections of river or watercourses which must include an adequate buffer for flooding and maintenance purposes.
- B) Where on-site environmental enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant projects for the enhancement or deculverting of other sections of rivers or watercourses.
- C) Existing wharves and their access will be protected for continued use.
- D) Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which fail to secure feasible enhancements or deculverting, will be resisted.
- E) Development located in or adjacent to watercourses should enhance the waterside environment and biodiversity by demonstrating a high design quality which respects the historic significance of the canal and character of the waterway and provides access and improved amenity to the waterfront.
- F) All development alongside or that benefits from a frontage on the Grand Union Canal will be expected to contribute to the improvement of the Canal.

The refurbishment of existing retail unit is proposed to include the installation of a new shopfront but no drawings of this have been submitted for consideration. Detailed plans should accompany any formal application submission and accord with the requirements of Policy DMHB 11.

A total of 9 no. car parking spaces are proposed to adjoin the River Pinn and access road to the north of the site. This proposal appears to already exist unlawfully and is likely to be intruding on the root protection areas of adjoining trees. The development would also be contrary to Policy DMEI 8 of the

Hillingdon Local Plan: Part 2 (2020) which requires that development does not extend within 8 metres of the top of the bank of a main river. This proposal is not supported and should be replaced by landscaping and tree planting as mitigation in respect of flooding and drainage, as well as the urban heat island effect and air quality.

It is noted that the site is located within the Hillingdon Air Quality Management Area and West Drayton/Yiewsley Air Quality Focus Area. The proposed design of the site would therefore significantly benefit from tree planting to the front of the site as a green buffer and air quality mitigation.

## TREES AND LANDSCAPING

Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) require that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should enhance amenity, biodiversity and green infrastructure. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

Policy DMEI 6 of the Hillingdon Local Plan: Part 2 (2020) states that new development adjacent to the Blue Ribbon Network should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

It is understood that there are some landscape features on the existing site that could be affected by the redevelopment of the site. As per the policy above, the proposal should provide landscape enhancement and complement the setting of the Blue Ribbon Network. It is also recommended that any proposal provides connections to the canal footpath alongside flood compensation features.

Policy G5 of the London Plan (2021) states that residential development should achieve a Urban Greening Factor score of 0.3 for commercial development. Any forthcoming application submission should demonstrate compliance with this policy.

## ECOLOGY

Paragraph 174 of the NPPF (2021) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

Any formal application submission should be supported by an Ecological Enhancement Scheme. Any planting proposed should maximise ecological value.

## LISTED BUILDINGS

Policy DMHB 2 of the Hillingdon Local Plan: Part 2 (2020) states that planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Notably, the Grade II Listed Hillingdon Manor Grange and a Barn at Philpotts Yard are located a short distance to the east, measuring approximately 50 metres in distance. Accordingly, any form of development will need to respect the setting and character of these heritage assets.

### 3. Amenity

#### IMPACT ON NEIGHBOURS

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:



B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Paragraph 5.38 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary."

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 (2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook."

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

Residential properties are located a short distance to the east and west of the site. It is not considered likely that the redevelopment of the site as presented would impact the privacy of neighbouring residents or the receipt of daylight and sunlight.

Please be advised that the consideration of daylight and sunlight assessments will require the Council to utilise an external specialist at the expense of the applicant.

## NOISE

The relevant planning policy considerations are outlined below for reference.

Policy D14 of the London Plan (2021) states:

- A) In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
- 1) avoiding significant adverse noise impacts on health and quality of life
  - 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
  - 3) 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 existing noise-generating uses
  - 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
  - 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
  - 6) 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 applying good acoustic design principles
  - 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

As noted above, the site is located a short distance to the east and west of residential properties. These represent notable constraints on the permitted noise environment of any future use. It is emphasised that the sensitive noise environment should inform the principle design of the site.

#### 4. Highways

The site is located on the west side of Yiewsley High Street / High Road (A408). Based on TfL's WebCAT planning tool, the site has a PTAL rating of 2 (low).

The following planning policies are considered:

Policy DMT 1 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Hillingdon Local Plan: Part 2 (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also that impacts on local amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. This should be viewed in conjunction with Policies T6 and T6.1 of the London Plan (2021).

Paragraph 111 of the NPPF (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This is supported by Policy T4 of the London Plan (2021).

#### HIGHWAY SAFETY

An intensification of the use of the site would raise some concerns with regard to highway safety. Notably, the site is located a short distance to the east and west of residential properties. The Rabbsfarm Primary School and Young People's Academy are also located some 200 metres to the east. Clarification on the vehicle typology proposed and number of trips generated from the site is required.

#### CAR PARKING FOR RETAIL

Policy T6.3 of the London Plan (2021), Table 10.5, states that retail development located in the rest of outer London requires up to 1 space per 50m<sup>2</sup> GIA. The development should accord with these requirements.

#### DISABLED PERSONS CAR PARKING

Policy T6.1 of the London Plan (2021) states:

G) Disabled persons parking should be provided for new residential developments. As a minimum, proposals should:

1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay

per dwelling is available from the outset

2) demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.

H) All disabled persons parking bays associated with residential development must:

- 1) be for residents' use only (whether M4(2) or M4(3) dwellings)
- 2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling
- 3) be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)
- 4) count towards the maximum parking provision for the development
- 5) be designed in accordance with the design guidance in BS8300vol.1
- 6) be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.

Any formal planning application should demonstrate compliance with the above.

## ELECTRIC VEHICLE CHARGING POINTS

Policy T6 of the London Plan (2021) states that new developments with car parking should make provision for electric vehicles or other Ultra-Low Emission vehicles. All operational parking should make this provision, including active charging points for all taxi spaces and loading bays and offering rapid charging for the active points provided. Policy T6.2 of the London Plan (2021) applies to employment uses and supports this. The applicant is encouraged to maximise the provision of active and passive electric vehicle rapid charging points.

## CYCLE PARKING FOR RETAIL

Policy T5, Table 10.2, of the London Plan (2021) requires the following cycle parking provision for food and non-food retail:

Food retail:

- Long-stay: 1 space per 175 sqm gross external area (GEA)
- Short-stay: 1 space per 40 sqm for the first 750 sqm and thereafter 1 space per 300 sqm (GEA)

Non-food retail:

- Long-stay: 1 space per 250 sqm for first 1000 sqm and thereafter 1 space per 1000 sqm (GEA)
- Short-stay: 1 space per 125 sqm for first 1000 sqm and thereafter 1 space per 1000 sqm (GEA)

## VEHICULAR TRIP GENERATION

A Transport Assessment should accompany the full planning application in order to consider the impact of the proposal on the local highway network. This should be written in accordance with the recently published Transport for London Health Streets format and include an Active Travel Zone assessment. The Transport Assessment should highlight how development contributes towards the Mayor of London's road safety Vision Zero. Full details are available at:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>

It is noted that there are more trips associated with food retail when compared to other forms of retail, especially bulky goods retail which is generally considered to be associated with fewer trips.

Specifically, confirmation should be provided in relation to the catchment area of the development. Comparable information should be provided for similar development to demonstrate whether the site would serve a large number of local residents within walking distance of the site or whether there would be a significant number of patrons who come from a far distance.

## TRAVEL PLAN

For the proposed scale of development, a Travel Plan (TP) is required. This requirement conforms with Transport for London's (TfL's) guidelines as it would address all good practice mechanisms necessary to achieve a modal shift away from the private motor car thereby leading toward a sustainable personal travel mode to and from the site. The Travel Plan should be produced in accordance with the latest Transport for London Guidance available at:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/travel-plans>

As surety that the Travel Plan will be implemented and targets achieved, the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This would be secured by way of a Section 106 agreement. If the Travel Plan is successful the bond will be returned.

## CONSTRUCTION LOGISTICS PLAN AND SERVICE DELIVERY PLAN

The Highway Authority requires that a Construction Logistics Plan, Service and Delivery Plan are submitted for approval. These documents should be produced based on the guidance produced by TfL tailored to the development and local circumstances. These should be secured by way of suitable planning condition and/or S106 contributions.

Construction Logistic Plans:

<http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

Service and Delivery Plans:

<http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

### 5. Other

## FLOOD AND WATER MANAGEMENT

Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 (2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

Of particular relevance is Policy DMEI 10 of the Hillingdon Local Plan: Part 2 (2020) which states:

- A) Applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy (Policy SI 13).
- B) All major new build developments, as well as minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus 30% an appropriate allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.
- C) Rain Gardens and non householder development should be designed to reduce surface water run-off rates to Greenfield run-off rates.

- D) Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.
- E) Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.
- F) Developments should be drained by a SuDS system and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the SuDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon. Major development should adopt a 'treatment train' approach where water flows through different SuDS to ensure resilience in the system. Water Efficiency
- G) All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.
- H) All new residential development should demonstrate water usage rates of no more than 105 litres/person/day.
- I) It is expected that major development proposals will provide an integrated approach to surface water run-off attenuation, water collection, recycling and reuse. Water and Wastewater Infrastructure
- J) All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development. Where there is a capacity constraint the Local Planning Authority will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.

The above is supported by Policies SI 12 and SI 13 of the London Plan (2021).

Evidently, the formal planning application should be accompanied by a drainage assessment and strategy incorporating sustainable drainage systems and surface water runoff mitigation.

## AIR QUALITY

Paragraph 186 of the National Planning Policy Framework (2021) states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

Policy SI 1 of the London Plan (2021) supports the above.

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

Policy DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) states that all development proposals are required to comply with the following:

- i) All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and
- ii) Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) states:

- A) 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.

B) 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.

The site is located a short distance to the east and west of residential properties. The Rabbsfarm Primary School and Young People's Academy are also located some 200 metres to the east. Including the residential properties, these are all considered to be sensitive receptors forming part of the Hillingdon Air Quality Management Area and Yiewsley Air Quality Focus Area, an area of known poor air quality and high human exposure in need of significant air quality improvement.

To be compliant with policy the development must demonstrate:

- it is at least air quality neutral, it should be noted that as the proposal is within an Air Quality Focus Area more stringent mitigation may be required;
- given the size of the development, and, especially given its location in an Air Quality Focus Area, that an Air Quality Positive approach has been taken;
- it includes sufficient mitigation to ensure that the demolition, construction phase and operational phases do not impact on relevant receptors. This includes both existing receptors and those newly introduced by the development;
- that the demolition and construction phases are carried out in accordance with the relevant Mayor of London guidance including the use of NRMM compliant machinery;
- that the design aspects have been assessed to provide a clean by design development. For example, the use of Ultra Low NO<sub>x</sub> technologies and/or low/zero emissions technologies for energy, low/zero technologies for associated traffic, protection of new receptors from pollution sources such as road traffic, emissions from flues, protection of amenity spaces from pollution sources such as roads etc.
- that cumulative assessment with any granted planning applications in the catchment area of the operation of the site has been undertaken

#### Requirements on application

The development will require an air quality assessment including an Air Quality Neutral assessment, plus demonstration of an Air Quality Positive approach, from design through to operation. Specific advice on scope can be given at the appropriate time. It should be noted that the accuracy of the air quality assessment will depend upon the inputs and full implications of the transport impacts.

As the proposal is within an Air Quality Focus Area it is not sufficient to just meet the air quality neutral benchmarks. This approach is supported by the new London Plan which explains that just meeting air quality neutral benchmarks will not always be sufficient to prevent unacceptable local impacts, especially where these are affected by factors such as location. The air quality assessment should demonstrate the air quality positive approach taken and the clean by design measures incorporated into the development.

Where, after appropriate on-site mitigation measures have been incorporated, any remaining development emissions will be required to be off-set. This can be provided in total by the developer or in part by providing funds to support off-site measures to improve air quality. The pollution damage costs associated with the emissions from the development will inform the degree of mitigation that is required.

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

## GREENHOUSE GAS EMISSIONS

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 (2020) requires that:

- A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets;
  - B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved;
  - C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted.
- However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

This is supported by Policy EM1 of the Hillingdon Local Plan: Part 1 (2012).

Policy SI 2 of the London Plan (2021) states that major development should be net zero-carbon, in accordance with the energy hierarchy: Be lean: use less energy and manage demand during operation; Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly; Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and Be seen: monitor, verify and report on energy performance.

Any forthcoming planning application should be supported by an Energy Strategy to demonstrate compliance with the above.

## OVERHEATING

Policy SI 4 of the London Plan (2021) states:

- A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
  - 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
  - 2) minimise internal heat generation through energy efficient design;
  - 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
  - 4) provide passive ventilation;
  - 5) provide mechanical ventilation; and
  - 6) provide active cooling systems.

Any forthcoming planning application should be supported by an Overheating Strategy to demonstrate compliance with the cooling hierarchy.

## CONTAMINATED LAND

Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that:

- A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.
- B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of

development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

In the context of land that may be affected by contamination, a preliminary risk assessment, conducted in 2020, identified eight potential pollutant linkages at the site. In terms of the previously proposed redevelopment of the site, the overall risk was considered to be medium

Therefore, a Phase 2 ground investigation and a Tier 2 Generic Quantitative Risk Assessment (GQRA) would be recommended to characterise the site more precisely and in accordance with current standards and prevailing guidelines concerning land condition and suitability for use.

For information at this stage, for the potential redevelopment options, as outlined in the submitted Design Statement document, it is most likely the following standard condition/s would be imposed concerning land contamination, particularly if the findings from ground investigation/s at the site confirm unacceptable risks are present:

(i) The development shall not commence until a scheme to deal with contamination has been submitted to and approved by the Local Planning Authority (LPA). All works which form part any required site remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A site investigation, including where relevant soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works for each phase will be verified shall be agreed in writing with the LPA prior to commencement of each phase, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.



## REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

## SECURITY

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

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

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

## FIRE SAFETY

Please be advised that Policy D12 of the London Plan (2021) states the following:

A) In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space:
  - a) for fire appliances to be positioned on
  - b) appropriate for use as an evacuation assembly point
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; appropriate fire alarm systems and passive and active fire safety measures
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

Given the above, applicants are encouraged to consider fire safety early within the development process.

## CATEGORISATION OF THE APPLICATION

The Council's scheme of delegation states that the Major Applications Committee will determine major planning applications that involve:

1. the creation of 10 or more residential units.
2. residential development on a site of 0.5 hectares or more

3. non-residential development on a site of at least 1 hectare
4. non-residential development that creates more than 1000 square metres of new gross floorspace
5. the creation of a change of use of 1000 square metres or more of gross floor space (not including housing)
6. Council owned development sites / applications where the Council is the applicant.

Given the above, a formal full planning application for the proposed development would be categorised as a major planning application.

## 6. Planning Obligation and CIL (Mayor and LBH)

### S106 PLANNING OBLIGATIONS

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states:

A) To ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

B) Planning obligations will be sought on a scheme-by-scheme basis:

- i) to secure the provision of affordable housing in relation to residential development schemes;
- ii) where a development has infrastructure needs that are not addressed through CIL; and
- iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

### COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m<sup>2</sup> or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable is as follows:

- Large format retail development (A1) greater than 1,000 square metres, outside of designated town centres - £215 per square metre
- Offices (B1) - £35 per square metre

- Hotels (C1) - £40 per square metre
- Residential Dwelling Houses (C3) - £95 per square metre
- Industrial (B8) - £5 per square metre

Should you require further information please refer to the Council's Website  
[www.hillingdon.gov.uk/index.jsp?articleid=24738](http://www.hillingdon.gov.uk/index.jsp?articleid=24738)

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

7. Application Submission

The Council's adopted Local Planning Validation Checklist (June 2020) is available on the Council website and sets out a full list of the information required to validate a Full Planning application.

8. Conclusion

This pre-application seeks advice on a proposal for the refurbishment of the existing retail unit (Class E) including installation of new shopfront, reconfiguration of car park, landscaping and associated works. No new floorspace is proposed but the proposals would extend the quantum of floorspace that can be used for the sale of food and drink products from 240 square metres to 892 square metres, an increase of 652 square metres.

The uplift in the amount of floorspace that could be used to sell food and drink is deemed to be significant. A sequential test and retail impact assessment will be required as part of any future planning application submission. The sequential test and retail impact assessment would be reviewed by a third party to determine the availability of alternative sources and the harm that may arise towards the town centre.

The location of the site within Flood Zones 2 and 3, the Hillingdon Air Quality Management Area and Yiewsley/West Drayton Air Quality Focus Area is emphasised. Accordingly, any forthcoming application submission should be carefully designed and incorporate measures to mitigate flood risk, the urban heat island effect and air quality.

If the principle issue in respect of retail impact and sequential test can be overcome, then the formal application submission should be supported by a revised design and the documentation requested within the main body of the report to aid the detailed consideration of the application.

9. Planning Performance Agreement

Central Government encourages the use of Planning Performance Agreements (PPAs) for larger and more complex major planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process. A PPA can be used to ensure provision of a dedicated planning resource focusing on your application to ensure it is dealt with as a priority, it is highly recommended that you enter into a PPA. This typically involves funding from the developer to allow the Authority to hire an additional planner to act as a dedicated case officer for your proposals.

The key advantage to entering into a PPA is that the Council will have the resources in place to ensure that the application proceeds through the application process in a timely fashion and result in high quality development. Ed Laughton and Noel Kelly are available to discuss the details of a PPA ([elaughton@hillingsdon.gov.uk](mailto:elaughton@hillingsdon.gov.uk) & [nkelly@hillingsdon.gov.uk](mailto:nkelly@hillingsdon.gov.uk).)

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

**Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible,**

**in order to ensure the necessary resource are in place to meet the terms of the PPA.**

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Michael Briginshaw  
Planning Officer  
London Borough of Hillingdon**

#### Planning Guarantee

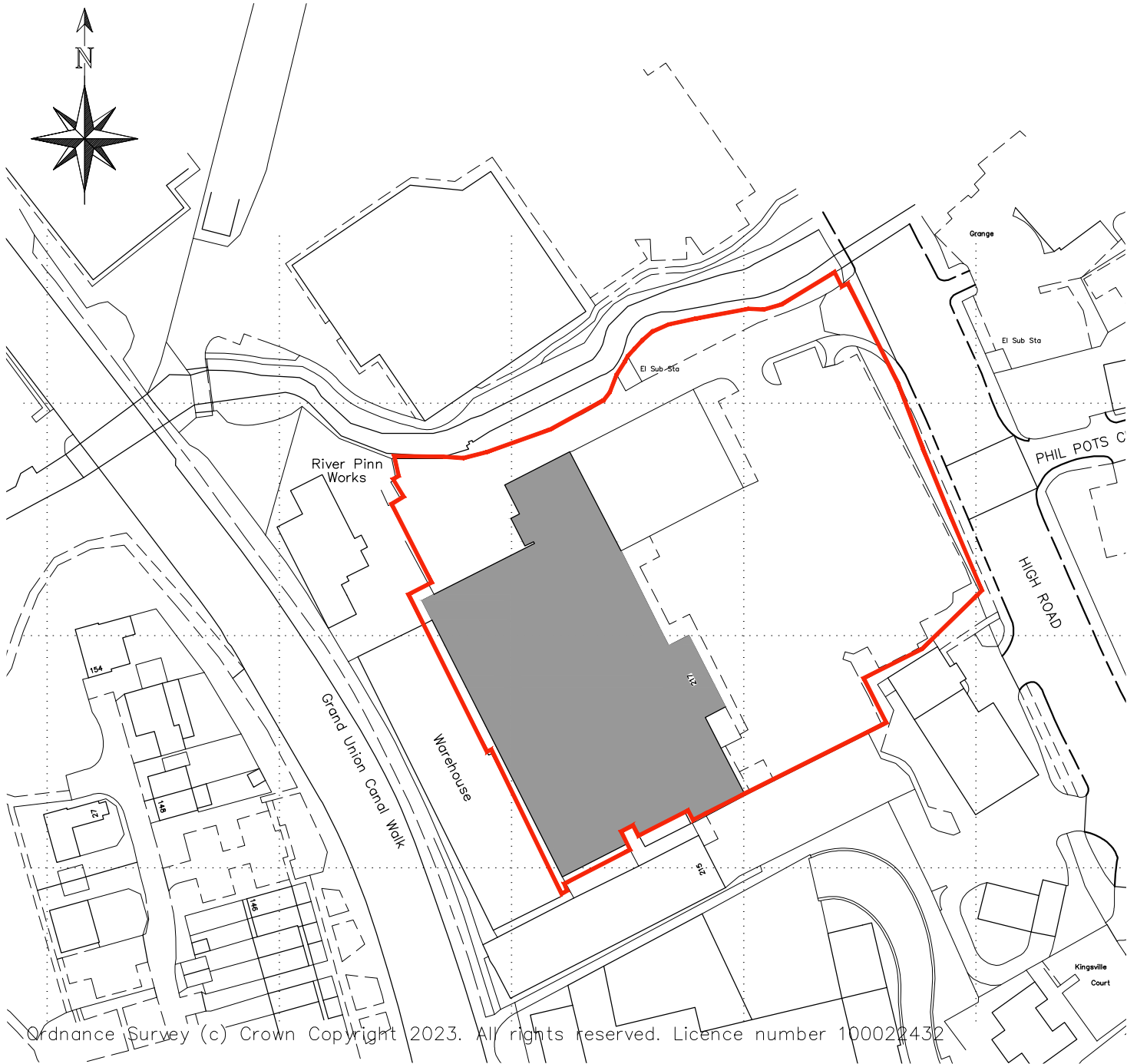
For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

**Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.**



## Appendix B – Site Location Plan



0m 10m 50m 125m  
1:1250



**WPL Consulting LLP**

1 Airport West Lancaster Way Leeds LS19 7ZA

Tel: 0113 202 9444 Fax: 0113 202 9333

E-mail: mail@wplconsulting.co.uk

PROJECT TITLE  
217 High Street  
West Drayton  
UB7 7GN

DRAWING TITLE  
Site Location Plan

PROJECT No:

9864

SCALE:

1:1250@A4

DRAWING No:

LC01

DATE:

March 23

REVISION:

DRAWN BY:

REV.

DATE

AMENDMENT

CHECKED BY:

DATE:



## Appendix C – Public Transport Map





A detailed map of the West Drayton area in the UK. A large blue circle is drawn around the West Drayton train station, labeled '5 minute walk'. The map shows various landmarks, including Waterside Park, Rainbow Industrial Estate, West Drayton Coal Depot, and several churches and schools. The River Crane flows through the area. A grid system is overlaid on the map, with letters A, B, and C at the bottom and numbers 1, 2, and 3 on the left side.

West Drayton DR TFL31224.03.16 (T)

[illegible]

Destination	Bus routes	Bus stops
<b>P</b>		
Park View Road	US	ⓐ ⓑ ⓓ
Pied Heath Way Peel Way	US	ⓐ ⓑ ⓓ
	US	ⓐ ⓑ ⓓ
<b>R</b>		
Porters Way	US	ⓐ ⓑ ⓓ
<b>R</b>		
Ruislip 🚶	U1	ⓐ ⓑ
Ruislip High Street	U1	ⓐ ⓑ
<b>S</b>		
Sipson	222	ⓐ ⓑ ⓓ ⓔ
Station Road [Kewley]	222	ⓐ ⓑ ⓓ ⓔ
Station Road [Church Road]	US	ⓐ ⓑ ⓓ ⓔ
	222, US	ⓐ ⓑ ⓓ ⓔ
Station Road	350	ⓐ ⓑ ⓓ ⓔ
Station Road	350	ⓐ ⓑ ⓓ ⓔ
West Drayton Police Station	350	ⓐ ⓑ ⓓ ⓔ
Stokeley Estate [Hollybury Parade]	US	ⓐ ⓑ ⓓ ⓔ
Stokeley Park Roundwood Avenue	350	ⓐ ⓑ ⓓ ⓔ
	U1	ⓐ ⓑ ⓓ ⓔ
Stokeley Road	U1	ⓐ ⓑ ⓓ ⓔ
Swanley Road	U1	ⓐ ⓑ ⓓ ⓔ
Swanley Roundabout	U1	ⓐ ⓑ ⓓ ⓔ
<b>S</b>		
Swan Road	U	ⓐ ⓑ ⓓ
<b>U</b>		
Uxbridge	222, US	ⓐ ⓑ ⓓ ⓔ
	U1	ⓐ ⓑ
	US	ⓐ ⓑ ⓓ ⓔ
	US	ⓐ ⓑ ⓓ ⓔ
<b>V</b>		
Uxbridge High School	US	ⓐ ⓑ ⓓ ⓔ
Violet Avenue	U1	ⓐ ⓑ ⓓ ⓔ
<b>W</b>		
West Ruislip 🚶	U1	ⓐ ⓑ
Wise Lane	U1	ⓐ ⓑ
<b>Y</b>		
Viewley Library	222, US	ⓐ ⓑ ⓓ ⓔ
	U1	ⓐ ⓑ
	U1	ⓐ ⓑ

- Use your contactless debit or credit card. It's the same fare as Oyster and there is no need to top up.
- Top up your Oyster pay as you go credit or buy Travelcards and bus & tram passes at around 4,000 shops across London.
- Sign up for an online account to top-up online and see your travel history and spending.





## Appendix D – Example Travel Survey

## Example Staff Travel Survey

### 1. Gender:

- ☐ Female
- ☐ Male
- ☐ Prefer not to say

### 2. Age:

- ☐ Under 20
- ☐ 20 - 24
- ☐ 25 - 29
- ☐ 30 - 39
- ☐ 40 - 49
- ☐ 50 +

### 3. Do you have a disability which affects your travel arrangements?

- ☐ Yes
- ☐ No
- ☐ Prefer not to say

### 4. What is your primary mode of travel to work?

- ☐ Car Driver (alone)
- ☐ Car driver (with passenger(s))
- ☐ Car Passenger
- ☐ Train
- ☐ Bus
- ☐ Other (please specify)
- ☐ Bicycle
- ☐ E-Bike
- ☐ On Foot
- ☐ Motorbike / Moped
- ☐ Work from Home Mostly

### 5. How far do you travel to work?

- ☐ Up to 1 mile
- ☐ Over 1 mile to 2 miles
- ☐ Over 2 miles to 5 miles
- ☐ Over 5 miles to 10 miles
- ☐ Over 10 miles

### 6. Would any of the following changes encourage you to cycle to work?

- ☐ YES - Improved cycle paths on the journey to work
- ☐ YES - Improved cycle parking at work
- ☐ YES - Improved cycle changing facilities & lockers at work
- ☐ Other (please specify)
- ☐ YES - Cycle training
- ☐ YES - Discounts on bike equipment and accessories
- ☐ NO

7. Would any of the following changes encourage you to use public transport to get to work?

- |  |  |
|--|--|
| <input type="radio"/> YES - More direct bus routes                                     | <input type="radio"/> YES - Cheaper bus tickets  |
| <input type="radio"/> YES - More frequent bus services                                 | <input type="radio"/> YES - More information on public transport information i.e. routes/timetables etc. |
| <input type="radio"/> YES - Better lighting at bus stops and on footpaths between work | <input type="radio"/> NO   |
| <input type="radio"/> YES - Bus stops closer to work                                   |  |
| <input type="radio"/> Other (please specify)   |  |

8. What is your main reason for using a car to get to work? Please tick one box only

- |  |   |
|--|---|
| <input type="radio"/> Additional stops to / from work i.e. dropping children at school | <input type="radio"/> Convenience                             |
| <input type="radio"/> Get a lift   | <input type="radio"/> Public transport is not frequent enough |
| <input type="radio"/> Health reasons   | <input type="radio"/> No direct public transport routes       |
| <input type="radio"/> Takes the least amount of time                                   | <input type="radio"/> I don't use the car to get to work      |

9. Would you be prepared to car share?

- ☐ Yes - as the driver
- ☐ Yes - as the passenger
- ☐ Yes - both
- ☐ No

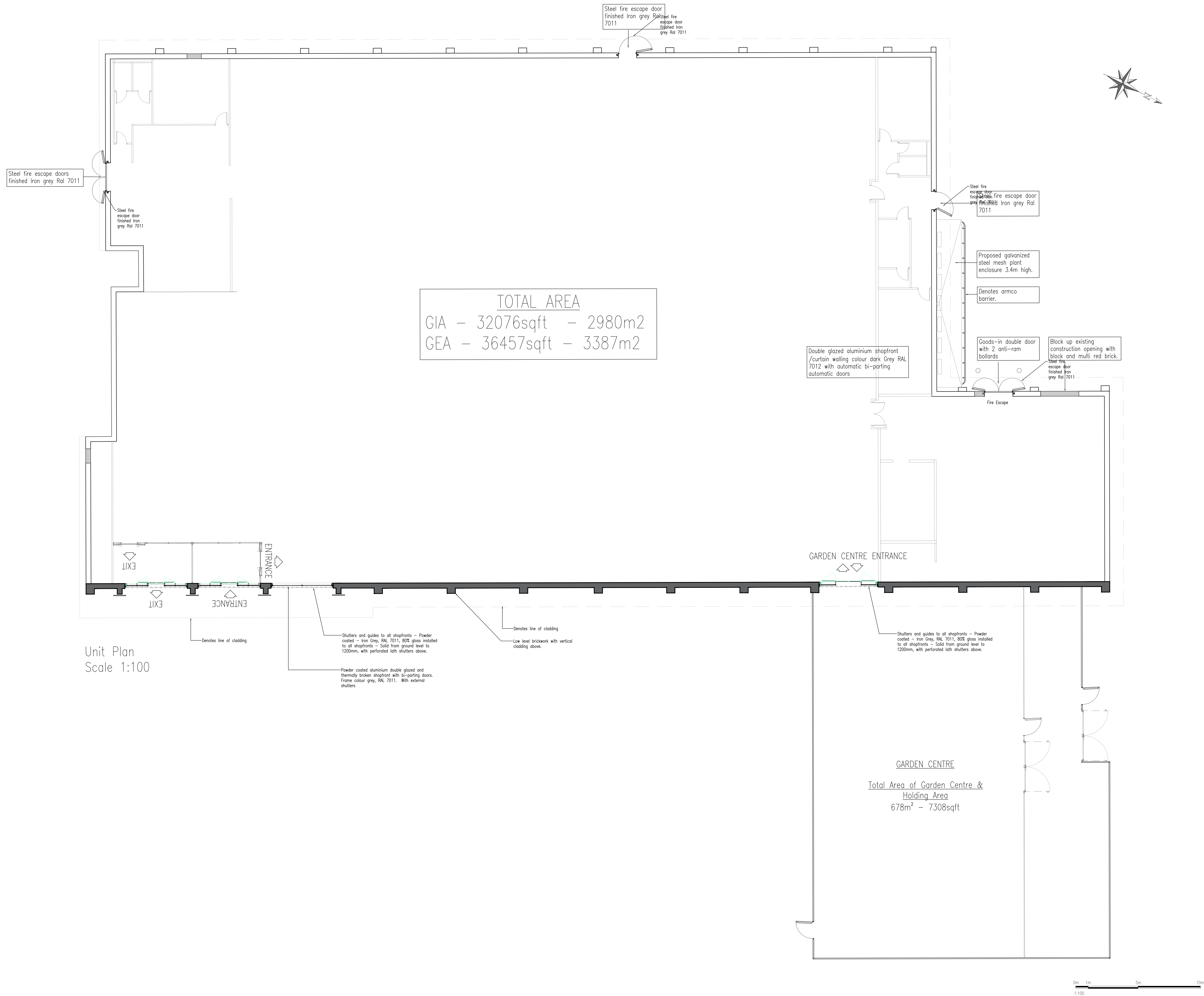
10. Would any of the following changes encourage you to car share?

- |  |  |
|--|--|
| <input type="radio"/> YES - Help finding car share partners with similar work patterns | <input type="radio"/> YES - More information on the benefits of car sharing? |
| <input type="radio"/> YES - Free lift home if let down by car sharer                   | <input type="radio"/> NO   |
| <input type="radio"/> YES - Reserved parking for car sharers                           |  |
| <input type="radio"/> Other (please specify)   |  |

11. Do you have any further comments regarding commuting and other work related journeys?



## Appendix E – Site Layout Plan



Unit Plan  
Scale 1:100

home

bargains


TOP BRANDS - BOTTOM PRICES

Planning

B  
A  
REV.

14.04.23  
07562023  
DATE

Updated design - retail and garden centre  
North point added  
AMENDMENT



WPL Consulting LLP

1 Airport West, Lancaster Way, Leeds, LS19 7ZA  
Tel: 0113 202 9444 Fax: 0113 202 9333  
E-mail: mail@wplconsulting.co.uk

PROJECT TITLE

217 High Street  
Viewsley  
West Drayton

DRAWING TITLE

Proposed Plan

PROJECT No:

DRAWING No:

REVISION:

9864

106

B

SCALE:

DATE:

DRAWN BY:

1:100 @ A0

19.04.23

WJB

CHECKED BY:

DATE:

# rappor



Rappor Consultants Ltd

[www.rappor.co.uk](http://www.rappor.co.uk)

Cheltenham  
Bristol  
London  
Bedford  
Exeter  
Cirencester

