



Quod

Planning & Retail Assessment

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

JUNE 2023

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Documents

- 1 Photographic evidence of anti-social behaviour occurring on the Site
- 2 Site Location Plan
- 3 Copies of Relevant Decision Notices
- 4 Pre-application correspondence with the London Borough of Hillingdon
- 5 Retail Tables

1 Introduction

1.1 This Planning and Retail Assessment ('PRA') has been prepared by Quod on behalf of TJ Morris Limited ('TJM') ('the Applicant'), in support of a full planning application to refurbish the former B&M store at 217 High Street, Yiewsley, West Drayton, UB7 7GN ('the Application Site'). Specifically, planning permission from London Borough of Hillingdon ('LBH') for the following development:

"Refurbishment of existing retail unit for use within Class E(a) including the sale of non-food and food and drink products, installation of new shopfront, reconfiguration of car park, landscaping, external plant and associated works."

1.2 The application is being pursued to enable the reoccupation of the existing, vacant retail unit by the national retailer, Home Bargains ('HB').

1.3 The proposals are modest in nature. The Application Site comprises the former B&M discount variety store which comprises an established retail destination at the edge of Yiewsley – West Drayton district centre. The Application Site has been vacant since B&M vacated the premises in October 2020. Whilst previous proposals had been advanced to redevelop the site for a residential-led mixed-use development, this application ultimately failed on appeal and the retail unit has sat economically inactive for nearly three years, offering nothing to the local economy. Significantly, in recent months, the Application Site has the subject of anti-social behaviour, including trespassing, fly-tipping and criminal damage. This has cost the Applicant more than £200,000 to date, and the site continues to be vulnerable to criminal behaviour unless its reuse is secured. Photographs illustrating this anti-social behaviour is provided at **Document 1**.

1.4 The proposals will deliver a high-quality scheme that will regenerate a vacant prominent site and introduce a new retailer (HB) to Yiewsley – West Drayton and its residents. In addition to improving consumer choice, the proposals will positively contribute to the local economy through the creation of up to 120no. full and part time jobs and secure the long-term occupation of a long-standing vacant retail unit. The refurbished store unit will also boast greater sustainability credentials as well as improve the appearance of a prominent site located on the A408, a main arterial route through the borough.

1.5 Although the proposals are relatively modest in nature there are significant economic, social, and environmental benefits arising from the proposed development, as we will come on to evidence. The development will result in substantial investment in the local area, delivering significant employment opportunities and improving consumer choice on this important gateway site. It is in this context that the proposals are being advanced.

1.6 In terms of the structure of the PRA:

- **Section 2** sets out the factual background of the proposal, including the Application Site and surrounding area, relevant planning history, the proposed development and details of the prospective occupier;

- **Section 3** outlines the planning policy framework within which the proposals should be considered;
- **Section 4** addresses the sequential approach to site selection and relevant retail tests;
- **Section 5** outlines the anticipated trading effects of the proposals;
- **Section 6** deals with wider development management considerations;
- **Section 7** outlines the development benefits; and
- **Section 8** provides a summary of the application and sets out the conclusions.

1.7 Finally, this statement should be read alongside the following supporting reports which accompany the planning application:

- Transport Statement and Framework Travel Plan (inc. Active Travel Zone Assessment), prepared by Rappor;
- Flood Risk Assessment, prepared by Rappor;
- Energy Strategy and Sustainability Statement prepared by Envision;
- Air Quality Assessment, prepared by Tetra Tech;
- Landscaping and Ecological Enhancement Plan, prepared by Encon Associates; and
- Existing and proposed planning drawings prepared by WPL Consulting LLP:

Reference	Drawing Title	Scale
9864- LC01	Site Location Plan	1:1250 @ A4
9864 101 Rev C	Existing Site Plan	1:200 @ A0
9864 102 Rev C	Proposed Site Plan	1:200 @ A0
9864 103 Rev A	Existing Ground Floor Plan	1:100 @ A0
9864 104	Existing Elevations	1:100 @ A0
9864 105	Existing Roof Plan	1:100 @ A0
9864 106 Rev B	Proposed Floor Plan	1:100 @ A0
9864 107	Proposed Elevations	1:100 @ A0
9864 108	Proposed Roof Plan	1:100 @ A0
9864 – 110	Proposed External Works Details	1:50 @ A1

2 Site Context and Proposed Development

Site and Surrounding Area

- 2.1 The Application Site extends to 0.98 hectares and is located off High Street in Yiewsley – West Drayton, occupying a prominent location as you enter the District Centre. A Site Location Plan (dwg. 9864- LC01) is appended at **Document 2**.
- 2.2 It currently comprises an existing retail unit (Class E), providing 3,066 square metres of floorspace (gross internal area), together with external display area, 159no. car parking spaces and associated servicing arrangements.
- 2.3 The existing retail building is currently vacant, having formerly been occupied by the discount variety retailer B&M, and has a tired appearance. Most recently, trespassers have entered the Application Site causing substantial damage to the existing building. Whilst an Interim Possession Order was served in May 2023, which has resulted in the Application Site being now being vacated, the cost to the Applicant is extremely high and without a clear future the risk of further criminal damage is high.
- 2.4 The Application Site is located approximately 290 metres to the northwest of Yiewsley – West Drayton district centre in an area that is characterised by retail / commercial uses. This includes an existing Tesco to the south and Cowley Retail Park, with representation from Currys and Pets at Home to the north, beyond the River Pinn. To the west, immediately adjacent to the unit lies commercial premises, and beyond this, the Grand Union Canal. To the east lies the High Street and residential properties. Vehicular and pedestrian access to the Site is via the High Street.
- 2.5 In terms of public transport, a bus stop is located approximately 20 metres away at Philpots Bridge, where the 222 bus route provides services to Uxbridge and Hounslow. West Drayton Railway Station is located approximately 1 kilometre to the south.
- 2.6 The Application Site is identified to be predominantly located within Flood Zone 2, although parts of the northern boundary encroach into Flood Zone 3a (Land at moderate to high risk of flooding).
- 2.7 There are no Tree Preservation Orders (TPO) within the Application Site although it does fall within the Hillingdon Air Quality Management Area (AQMA).
- 2.8 In terms of heritage assets, Hillingdon Manor Grange and the Barn at Philpotts Yard lie approximately 50 metres to the east across High Street, which are both Grade II listed. The Application Site also lies in an area of archaeological interest / Archaeological Priority Area, known as Colne Valley.
- 2.9 The Application Site is also in proximity to Heathrow Airport and is designated as being within a bird strike safeguarding zone. Within this zone, the principal concern is that the creation of new habitats may attract, and support populations of large and flocking birds close to Heathrow Airport.

Relevant Planning History

2.10 The retail unit was constructed under planning permission reference 41515B/93/606, dated 5th January 1995, which approved the following development.

"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)."

2.11 This permission was subject to 22no. conditions. This included a restriction on the use of the premises to a DIY store only (Condition 20). Deliveries were also restricted to 0800 to 1800 hours Monday to Friday; 0800 to 1300 hours on Saturdays and at no time on Sundays and Bank Holidays (Condition 21). A further condition was imposed (Condition 22) limiting the occupation of the development for a period of 5 years following completion to a specific retailer only (Great Mills (Retail) Limited).

2.12 This permission was also subject to a Section 106 Agreement dated 22nd December 1994. This included a restriction on the retail sale of food.

2.13 Condition 20 was relaxed in October 1996 (ref. 41515T/96/1111) with permission granted for the sale of the following:

"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".

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

2.15 A further Section 73 application (ref: 41515W/96/1778) was approved on 6th August 1997 to remove Condition 22 of the original 1995 consent, which restricted the occupation of the unit to a specific retailer for a period of 5 years following the completion of the development.

2.16 In March 2013, planning permission was also granted to further relax the sale of goods from the premises (ref. 68663/APP/2012/1706), with the following revised goods restriction being imposed:

"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" (our emphasis)

2.17 In granting permission, the London Borough of Hillingdon (LBH) also agreed to vary the original Section 106 agreement through the deletion of the clause preventing the sale of food.

2.18 Most recently, an appeal was dismissed in March 2021, following LB Hillingdon's refusal (ref. 68663/APP/2020/705) for the redevelopment of the Application Site for a residential-led mixed-use scheme comprising a health facility and 233no. residential apartments of between 5 and 6 storeys, with associated parking, communal podium garden, landscaping, and pedestrian and cycle canal link.

2.19 The appeal was dismissed as the benefits of the proposal were not identified to outweigh the failure to meet the sequential test and the harm that would result from placing new development at risk of flooding.

2.20 Copies of the relevant decision notices and legal agreements referred to above are contained at **Document 3**.

Proposed Development & Prospective Occupier

2.21 Full planning permission is sought for the following:

“Refurbishment of existing retail unit for use within Class E(a) including the sale of non-food and food and drink products, installation of new shopfront, reconfiguration of car park, landscaping, external plant and associated works.”

2.22 The proposed development is modest in nature and seeks to retain the existing retail unit and external display area. The new retail unit will extend to 2,980 square metres (gross internal area), a reduction in floorspace of 86 square metres. In accommodating HB, there will be some external alterations to the building, including a new shopfront, a customer entrance / exit lobby, and other associated works. There will also be a modest reduction in the size of the external display area.

2.23 The existing car park will be reconfigured to meet modern retailer requirements. The reconfigured car park will provide 120no. spaces, including 14no. EV parking spaces and 19no. disabled access spaces (including 1no. disabled EV space). 9no. car parking spaces adjacent to the River Pinn will be removed for additional landscaping which will benefit both biodiversity and flood risk/drainage. 20no. cycle spaces will be provided located in 2no. banks of Sheffield stands.

2.24 A new pedestrian access will also be provided through the car park from the High Street. The existing vehicular access and servicing arrangements will remain as existing.

2.25 Full detail of the proposed refurbishment works and wider site alterations are listed below and illustrated in the submitted planning drawings, prepared by WPL Consulting LLP.

- Reduction in the size of the unit from 3,066 square metres to 2,980 square metres. The external display area adjacent to the unit is also to be reduced from 695 square metres to 678 square metres;
- Reconfiguration of car park to provide 82no. standard spaces, 19no. disabled spaces and 5no. parent and child spaces. This is coupled with the installation of 15no. electric vehicle charging points (including 1no. disabled space). 20no. Sheffield cycle stands are to be installed at the front of the unit;
- New tree planting and landscaping across the Site (including the 9no. spaces to the north adjacent to river Pinn);
- Removal of existing lobby and entranceway substructures to be replaced by a new shopfront. The existing roller shutters are to be removed and replaced by new double-glazed aluminium shopfront with automatic, bi-parting doors.

- New signage zone to be installed (details of signage will be the subject of a separate application);
- New corrugated roof sheeting and the installation of photovoltaic (PV) panels on the roof (details subject to specification provided by specialist contractor);
- Alterations to the service yard including a replacement ARMCO barrier, new steel fire escape door, and plant enclosure. Existing loading dock roller shutter removed.
- Installation and replacement of several new steel fire escape doors. Colour Iron grey RAL 7011;
- New 4.2 metre high heras fencing and gates in RAL 7011 around the perimeter of the garden centre;
- Entranceway surface to be broken up and removed. New block and tactile paving to be laid through the car park;
- Installation of new trolley shelters and bollards with anti-ram cores within car park and at front of unit; and
- Replacement of existing lighting provision (details subject to specification provided by specialist contractor).

2.26 The proposals are being pursued to enable the existing retail unit to be occupied by HB, the trading name of TJM. TJM was established over 40 years ago by Tom Morris, who opened his first store in Liverpool. The business has grown organically to become one of the largest privately-owned companies in the UK and currently employs over 28,000 members of staff.

2.27 The business currently has more than 600 stores throughout the UK and plans to expand to over 1,200 stores, making HB one of the UK's fastest growing discount retailers in the UK.

2.28 HB is currently represented in Hayes and Southall, over five kilometres from the Application Site. As such, the proposals will introduce a retailer not currently represented in Yiewsley and West Drayton and improve the retail offer locally.

2.29 HB's strap line is '*Top Brands – Bottom Prices*' and they operate within the discount/ value, retail sector. Affordable access to good quality everyday goods is more important now than ever given the cost-of-living issues that people throughout the UK are increasingly facing. The discount retail sector has seen significant growth in recent years as shoppers have been attracted by the quality of products and competitive pricing.

2.30 The success of discount retailers and their ability to offer such low prices, is based on a combination of low profit margins and ruthless efficiency. The efficiency of HB's operation extends across all aspects of their business including their trading format.

2.31 HB's principal range includes health and beauty products, medicines, baby products, household products, toys and games, pet food, home furnishings and ornaments, seasonal products, food and drink products and an ancillary clothing and footwear range.

2.32 The above mix of goods form an integral part of HB's business model with a varied value product offer including food and non-food goods. This complete product range is required to attract customers and is essential in providing the appropriate synergy within the retail unit and provide a commercially viable store. It is not possible to disaggregate the product range

between alternative smaller units as it would not provide the required critical mass. Neither is it viable to exclude any of the above goods from being sold at the retail unit as this would preclude the retailer from successfully operating the required business model.

- 2.33 The bulk of goods sold by HB can already be lawfully sold under the baseline permission controlled the use of the existing retail unit. However, for HB to sell their full product range, the floorspace used for the sale of food and drink goods will increase from the 240 square metres (as currently permitted), to up to 894 square metres (or up to 30% of the total floorspace, of which no more than 90 square metres will be dedicated to perishable food and drink products. In addition to the modest broadening of the retail goods permitted to be sold, wider delivery hours are also proposed.
- 2.34 Finally, turning to trading and delivery hours, HB require trading and servicing between 8am and 8pm, Monday to Saturday, and any 6 hours between 10am and 5pm on Sunday.

Pre-application Engagement

- 2.35 Consistent with paragraphs 39 to 46 of the National Planning Policy Framework, the Applicant has actively engaged with Officers at LBH in a pre-application consultation (under planning reference 68663/PRC/2023/53).
- 2.36 This comprised a formal pre-application request, which outlined the nature of the proposed development and the broad approach to address relevant planning policies. This was followed by a meeting with Officers which took place on the 5th May 2023. LBH's written response to this meeting was issued on 26th May 2023, and was followed by subsequent email correspondence with Michael Briginshaw (Principal Planning Officer at LBH). Details of this correspondence is contained at **Document 4**.
- 2.37 Pre-application discussions with LBH focused on the principle of the changes being sought and the retail policy 'tests' to be addressed together with wider development management considerations.
- 2.38 In summary, this formal pre-application discussion has confirmed the following:
 - The proposals comprise a 'minor' development, given the extent of the Application Site (0.98 hectares) and the nature of development proposed.
 - The proposed uplift in floorspace to be used for the sale of food and drink is acceptable subject to the relevant retail tests being addressed and satisfied – namely the sequential approach to site selection and the impact test.
 - In terms of addressing the sequential test the broad approach has been agreed. It was also highlighted by Officers at the meeting that they were not aware of any sequential alternative sites that could accommodate the scale of development proposed.
 - With regard to retail impact, Officers confirmed that this would be reviewed by external consultants.

- The existing area of parking to the north of the Application Site (9no. spaces), adjacent to the River Pinn should be used for flood mitigation measures and landscaping rather than parking. This request has been reflected in the proposed site layout being advanced.

2.39 The feedback received from Officers during these pre-application discussions have been taken into consideration as part of the application submission.

3 Planning Policy Context

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 In this instance, the Development Plan comprises the London Plan (March 2021), the Hillingdon Local Plan Part 1 - Strategic policies (November 2012), and the Hillingdon Local Plan Part 2: Development Management Policies and Site Allocations and Designations (January 2020).
- 3.3 Material considerations include the National Planning Policy Framework ('NPPF') (July 2021) and the supporting Planning Practice Guidance ('PPG') together with relevant supplementary planning documents.

Development Plan

London Plan (July 2021)

- 3.4 The London Plan contains plans and policies which will help shape and develop London over the coming years.
- 3.5 The Application Site is located within the Heathrow Opportunity Area, with the potential to support 13,000 new homes and 11,000 new jobs by 2041. Policy SD1 notes that boroughs through decisions should take account of these indicative capacity targets for homes and jobs.
- 3.6 Policy GG2 ('Making the Best use of Land') looks to enable the development of brownfield land which includes utilising small sites.
- 3.7 Policy GG6 ('Increasing Efficiency and Resilience') seeks for London to become a more efficient and resilient city. This includes improving energy efficiency measures and ensuring buildings can adapt to climate change and making efficient use of water.
- 3.8 Policy SD6 ('Town Centres and High Streets') outlines that the vitality and viability of London's centres to be promoted and enhanced. It aims to:
 - "...4) strengthening the role of town centres as a main focus for Londoners' sense of place and local identity in the capital;*
 - 5) ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy..."*
- 3.9 Following on from this, Policy SD7 ('Town centres: Development Principles and Development Plan Documents') states that boroughs should take a town centre first approach, discouraging out-of-centre development of main town centre uses. Boroughs should, *inter alia*:

"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."

3.10 Policy E9 ('Retail, Markets, and Hot Food Takeaways') states that a retail sector which is diverse, successful, competitive, and promotes sustainable access to goods and services will be supported, particularly for town centres. In line with the relevant policies within the London Plan, it reads:

1) identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply

2) identify areas for consolidation of retail space where this is surplus to requirements

3) set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies. Particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 sq.m. gross A Use Class floorspace) can make to the provision of small shops and other commercial units. Where justified by evidence of local need, policies should secure affordable commercial and shop units."

3.11 Policy D14 ('Noise') outlines that proposals should manage noise by mitigating and minimising impacts from noise and improve and enhance the acoustic environment.

3.12 Policy SI1 ('Improving Air Quality') requires proposals to mitigate the deterioration of air quality or create unacceptable risk of high levels of exposure to air quality. Proposals must be at least air quality neutral.

3.13 Policy SI2 ('Minimising Greenhouse Gas Emissions') seeks development to be low to zero carbon and to include an energy strategy as to how this will be met.

3.14 Policy SI12 ('Flood Risk Management') outlines that proposals should minimise and mitigate any risk from flooding.

3.15 Policy SI13 ('Sustainable drainage') continues on this theme and outlines that proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed. Drainage should also be designed and implemented in ways which promote water efficiency.

3.16 Other policies of relevance include:

- Policy T1 ('Strategic approach to transport'), which identifies that proposals should make the most effective use of land, reflecting its connectivity and accessibility.
- Policy T2 ('Healthy streets') outlines that proposals should deliver patterns of land use that facilitate residents making trips by walking or cycling.
- Policy T4 ('Assessing and mitigating transport impacts') ensures that the impacts on the capacity of the transport network are to be fully assessed.
- Policy T5 ('Cycling') seeks to secure the provision of the appropriate levels of cycle parking within the development whilst T6.3 ('Car parking') covers the parking standards for retailing.

[Hillingdon Local Plan Part 1 - Strategic Policies \(November 2012\)](#)

3.17 Policy E5 ('Town and Local Centres') seeks to accommodate additional retail growth in established centres through accordance with the conclusions of the latest evidence base. Growth for comparison goods will be primarily accommodated in District Centres and planning decisions made in accordance with sequential and impact tests. Yiewsley - West Drayton is defined as a 'District Centre' in the borough's town centre hierarchy.

3.18 Policy E7 ('Raising Skills') seeks to ensure a range of training and employment opportunities are linked with the development of major sites for both construction phases and end use occupiers.

3.19 Policy BE1 ('Built Environment') sets out the council's aim to create successful and sustainable neighbourhoods having regard to the Secure by Design standards and *"achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place"*.

3.20 Policy EM6 ('Flood Risk Management') directs development away from Flood Zones 2 and 3. The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable.

[Hillingdon Local Plan Part 2 - Development Management Policies and Site Allocations and Designations \(January 2020\)](#)

3.21 Policy DMTC 1 ('Town Centre Development') outlines that 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."

3.22 Policy DMHB 7 ('Archaeological Priority Areas and Archaeological Priority Zones') seeks to ensure that sites of archaeological interest within or, where appropriate, outside, designated

areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works.

3.23 Other policies of relevance include:

- Policy DMHB 11 ('Design of New Development') which requires all development, including extensions, alterations, and new buildings to be designed to the highest standards and incorporate principles of good design.
- Policy DMHB 13 ('Shopfronts') requires new shopfronts and alterations to existing shopfronts to complement the original design, proportions, materials and detailing of the building of which it forms a part and the surrounding street scene. Proposals should contribute to the attractiveness, safety, and vitality of the street and surrounding area.
- Policy DMEI 14 ('Air Quality') requires proposals to demonstrate appropriate reductions in emissions and be at least 'air quality neutral' whilst actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.
- Policy DMT 6 ('Vehicle Parking') requires proposals to comply with the council's parking standards and the Council's Accessible Hillingdon SPD.

Material Considerations

National Planning Policy Framework (NPPF) (July 2021)

3.24 The NPPF is underpinned by a presumption in favour of sustainable development which is embodied within Paragraph 11.

3.25 Paragraph 8 sets out the economic objective to 'help build a strong, responsive and competitive economy'. Paragraph 81 goes on to advise that '*planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth*'.

3.26 Moreover, Paragraph 38 sets out that Local Planning Authorities (LPAs) should:

"...work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."

3.27 In terms of town centre and retail policies, these are set out at paragraphs 86 to 91 inclusive. Paragraph 86 advises that it is important that needs for all main town centre uses are met in full and not compromised by limited site availability.

3.28 It goes on to note that at paragraph 87 that LPAs should apply the sequential test to planning applications for main town centre uses that are not in an existing centre and not in accordance with within an up-to-date Local Plan. In undertaking such an assessment, paragraph 87 states that applicants and LPAs should demonstrate flexibility on issues such as format and scale.

3.29 In terms of retail impact, paragraph 90 advises that for retail development outside of town centres (which is not in accordance with an up-to-date plan) local planning authorities should:

“...require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500sqm). This should include an assessment of:

- *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*
- *the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment (as applicable to the scale and nature of the scheme.”*

3.30 Paragraph 81 to 85 set out the Government's planning policies for building a strong, competitive economy. Paragraph 81 in particular states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development....” (our emphasis)

3.31 Paragraph 119 relates to the Government's objective of making effective use of land and states that planning decisions should, *inter alia*, promote and support the development of underutilised land and buildings.

3.32 Section 12 ('Achieving well-designed places') supports the creation of high quality buildings and states that decisions should ensure that developments will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; optimise the potential of the site to accommodate and sustain appropriate amount and mix of development; and create places that are safe, inclusive and accessible.

Planning Practice Guidance

3.33 The online Planning Practice Guidance ('PPG') was initially published in March 2014, and it supports policies within the NPPF. It includes important guidance, including in addressing the relevant retail 'tests'.

Summary

3.34 The starting point for determining the proposal is the development plan, which in this instance comprises the London Plan (March 2021), the Hillingdon Local Plan Part 1 – Strategic policies (November 2012), and the Hillingdon Local Plan Part 2: Development Management Policies and Site Allocations and Designations (January 2020).

3.35 The Application Site is not allocated for any specific use, although comprises a well-established retail destination (as established by its former use) at the edge of Yiewsley – West Drayton

District Centre. Retail proposals in such locations are subject to certain criteria being satisfied. National, strategic, and local planning policy require retail proposals not in a defined centre and in accordance with up-to-date development plan to demonstrate compliance with the sequential approach to site selection, and dependent on scale, the impact test.

- 3.36 In addition to addressing the principle, there are also a number of development management policies that also need to be considered when assessing the application proposal, and these are assessed later in this report.

4 Sequential Approach to Site Selection

Context

4.1 Although the Application Site is located outside a defined centre, it comprises a well-established retail use, and was last occupied by a large-format discount variety retailer (B&M).

4.2 LBH has long accepted the Application Site as suitable for large-format retailing and that the sequential approach to site selection has previously been satisfied. Indeed, in determining the previous application to enable B&M to trade from the existing unit¹, LBH accepted that no sequentially preferable site existed to accommodate large format retailing. Specifically, the Officer's Report to Committee concluded that:

"Officers have been unable to find any existing, alternative vacant units, either within or on the edge of the centre, which would meet the prospective occupier's floorspace requirements."

4.3 Whilst this position was reached in October 2012, this conclusion provides important context given that the modest proposals now being advanced, which principally seeks to occupy the existing retail building.

4.4 Nevertheless, it is acknowledged that a new planning permission is sought and that a modest broadening of the retail goods permitted to be sold is proposed to include an increase in the quantum of floorspace that can be used for the sale of food and drink goods. Therefore, for the application proposals to be found acceptable in this location it will be necessary to satisfy the sequential approach to site selection.

4.5 Whilst the sequential approach seeks to focus development within defined centres, it does not preclude sites coming forward elsewhere if no available or suitable opportunity exists in a sequentially preferable location. This is reflected by previous planning decisions in the Borough, including at the Application Site.

Methodology and Approach

4.6 In applying the sequential approach to site selection, consideration must be given to the PPG, recent case law, and appeal / call-in decisions.

4.7 The PPG² advises that:

"Wherever possible, the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test will need to be proportionate and appropriate for the given proposal."

¹ ref. 68663/APP/2012/1706

² Reference ID: 2b-011-20190722

4.8 When considering suitability, the PPG also recognises that in applying the sequential approach to site selection, there are certain main town centre uses that have locational requirements. In particular, the PPG states:

“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations.”

4.9 These factors are pertinent in considering the form and nature of the application proposals, which in this instance is led by a specific type of retailer (a large-format discount variety store).

Flexibility

4.10 It is recognised that planning policy requires a degree of flexibility in relation to format and / or scale. The message established by recent Judgments and Secretary of State decisions is consistent in that there is a requirement to consider flexibility of format and scale, and a local planning authority must operate in the 'real world'.

4.11 The approach should not fundamentally compromise the development proposal. The *Dundee* Supreme Court Judgment established³ that if a site is not suitable for the commercial requirements of the development in question, then it is not suitable for the purposes of the sequential approach; and that in terms of size of the alternative site, if the applicant has demonstrated flexibility in format and scale, the question is:

“...whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can fit an alternative site.” (our emphasis)

4.12 The interpretation of 'suitability' was also clarified in the Secretary of State decision at Rushden Lakes⁴. In particular, the Inspector identified that the *Dundee* Judgment to be of 'seminal importance'. To this end, when commenting on suitability, the Inspector (para. 2.64, Inspector's Report) noted that:

“...if a site is not suitable for the commercial requirements of the developer in question then it is not suitable for the purposes of the sequential approach.”

4.13 Similarly, in determining an appeal in Sheffield⁵, the Inspector stated (para. 35, Inspector's Report) that:

“In considering the issue of suitability I have had regard to a ruling of the Supreme Court [Dundee] which indicates, amongst other matters, that what needs to be established is whether an alternative site is suitable for the development proposed, not whether the proposed development can be altered or reduced so that it can be made fit for purpose.”

³ Tesco Stores Limited (Appellant) v Dundee City Council (Respondent) (Scotland)

⁴ APP/G2815/V/12/2190175

⁵ APP/J4423/A/13/2189893

4.14 This position was built upon further in an appeal decision in Stoke-on-Trent⁶, where the Inspector concluded (para. 12, Inspector's Report) that:

“...taking account also of the 2012 judgment in Tesco Stores Limited v Dundee City Council, although an applicant is expected to demonstrate flexibility in assessing alternative sites, there is no unequivocal requirement to reduce the size of a proposed development to fit a particular site.”

4.15 It is in this context that the issue of flexibility must be considered.

Area of Search

4.16 Consistent with the position and accepted by LBH in determining the previous application on the Application Site, only opportunities within and at the edge of Yiewsley – West Drayton district centre need to be assessed. This approach has been agreed during pre-application discussions with Officers at LBH.

4.17 Following pre-application discussions with Officers LBH there is some disagreement as to whether the Application Site should be deemed edge or out-of-centre. LBH has long accepted that the Application Site is in an edge-of-centre location (as reflected by its planning history), and it is our view that the Application Site remains in an edge-of-centre location being within 300 metres of both the defined district centre boundary and the primary shopping area. Significantly, the extent of the district centre boundary or primary shopping area has not changed since LBH previously concluded that the Application Site comprises an edge-of-centre location permitting an increased in the quantum of floorspace that can be used for sale of food and drink goods⁷.

4.18 Notwithstanding this, whether the Application Site is deemed as an edge-of-centre or out-of-centre location is of little relevance given the approach undertaken in addressing the sequential approach. There is no dispute that the Application Site is accessible and well connected to the District Centre. The NPPF⁸ states that preference should be given to accessible sites that are well connected to the town centre. Consequently, for the purposes of the sequential approach, alternative 'in centre' sites have been assessed, together with edge-of-centre sites that can be deemed to better connected to the District Centre than the Application Site. There can be no dispute that even if the Application Site is deemed out-of-centre, there will be no better connected out-of-centre site. Therefore, out-of-centre sites do not need to be assessed as part of the sequential approach and it is within this context the sequential approach has been applied.

Sequential Test Parameters

4.19 In operating in the 'real world', the approach to site selection should not be applied to fundamentally compromise the development proposed.

⁶ APP/M3455/A/13/2195541

⁷ ref. 68663/APP/2012/1706

⁸ Paragraph 88

4.20 The development being pursued is being led by demand from a specific retailer (HB) that is seeking representation within the local area. The nearest existing HB stores are in Hayes and Southall.

4.21 As a result, the requirements of the type of retailer proposed (in this case a large format discount variety retailer) is of significance in applying the sequential approach.

4.22 HB's core product range comprises a mix of bulky and non-bulky goods, as well as an ancillary food and drink offer. The complete product range is required to attract customers to the store based on a very specific business model. Every product range is essential for HB in providing the appropriate synergy within the retail unit and provide a commercially viable store. It is not viable to exclude any of the core products from being sold at the retail unit, as this would fail to provide the full offer that customers have come to know and expect and preclude the retailer (and similar retailers) from successfully operating the required business model. These requirements are commonplace for other comparable retailers (including the previous occupier, B&M).

4.23 As with any successful business, HB's business model has evolved over time to facilitate the company's ability to operate viably in a competitive and challenging retail environment. To establish the most efficient and profitable trading format, this has led HB to trade from retail warehouse units where a large level open floor plate, efficient servicing arrangements and adjacent customer car parking are provided.

4.24 HB's operational requirements include the following fundamental components:

- The ability to sell the full range of goods including both bulky and non-bulky goods as well as ancillary food and drink products;
- An at-grade customer car park of an appropriate size directly adjacent to the retail unit to allow the safe and direct transfer of goods from store to customer vehicle;
- Simple, safe, and efficient at-grade servicing arrangements allowing direct rear servicing for 16.5 metre articulated vehicles to arrive, unload and leave the site without any disruption, conflict with the wider highway network or any negative impact on residential amenity;
- The provision of sales area on a single level. Multi-level store formats do not provide a viable trading position, not least because of the high proportion of customers who have been shown to undertake their shop using a trolley; and
- A customer base that can make purchases from various ranges, for example someone buying home furnishings may also want to purchase the other related household items and so on. The core element of the retail offer is the complementary nature of many of the products and the synergy that exists between the product ranges.

4.25 HB (and similar large-format discount retailers) identify that it is all these key components that any new store requires to, first, stock the full product range but, secondly, not result in excessive or underutilised space. In short, these are all key components of HB stores, and

other similar retailers' business model. Without any one of these, the retail model is unacceptably compromised, and thus the retailer will not proceed with a new store.

4.26 The application relates to a unit of 2,980 square metres (gross internal area) at ground floor, together with an external garden centre, appropriate servicing, dedicated customer, at-grade, car parking, and being in a location with prominent retail frontage. These criteria are essential for the future success of the new HB, and for the nature of retailing proposed.

4.27 The Application Site has been identified as an appropriate location to meet this need. It comprises an existing retail unit of sufficient size to accommodate the proposed use with sufficient at-grade customer parking and appropriate servicing – as reflected by the Application Site's former use. These are all essential factors when assessing the suitability of more central sites to accommodate the specific proposals and provide important pre-requisite requirements for the nature of retailing proposed.

4.28 Against this background, the sequential assessment has been based on the following parameters:

- A minimum gross internal area of at least 2,276 square metres on a single ground floor level. This demonstrates flexibility representing a c. 25% reduction to the proposed development (2,980 square metres) and represents the minimum floorspace requirement for HB – as outlined by details of HB's property requirements⁹.
- The provision of a sales area on a single level. Multi-level store formats do not provide a viable trading position, not least because of the high proportion of customers who have been shown to undertake their shop using a trolley (the high use of trolleys is reflected by the proposal including trolley bays within the car park).
- The ability to sell all core goods ranges including food and drink and bulky and non-bulky goods, including the provision of an external garden centre (as proposed);
- Located in a commercially viable location (including main road frontage).
- Immediately adjacent, at grade customer car parking, with trolley bays.
- Adequate servicing arrangements capable of receiving deliveries by large HGVs without customer conflict.

4.29 These criteria allow for flexibility in scale and format, whilst seeking to achieve and deliver a viable development.

4.30 As outlined above, in applying the sequential approach, the PPG recognises that there are particular market and locational requirements that need to be recognised. Such an approach has been reflected by recent Secretary of State / Appeal decisions. For example, in allowing an appeal in Gillingham, Dorset¹⁰ the Inspector was clear that in applying the sequential approach (para. 29, Inspector's Report) that:

⁹ https://www.homebargains.co.uk/static/TJM_Retail_Requirements.pdf

¹⁰ APP/N1215/W/18/3195092

“The question is whether any suggested alternative site is suitable and available for the broad type of development currently proposed in terms of size, type and range of goods, incorporating the requirement for flexibility.”

4.31 Likewise, in specifically dealing with an appeal for a HB out-of-centre in Gloucester¹¹ and specifically in assessing whether a more central site may have been suitable, the Inspector noted (para. 22, Inspector's Report) that:

“Home Bargains require a single floor operation. That might be said to be preference rather than a requirement – because Home Bargains does have some town centre stores. In general terms, however, its evolving business model is clearly no longer aimed at a town centre market. Also, that model expected direct servicing, something that may not be possible in King's Quarter. And there is the requirement (or preference) for trolley provision for customers; that may not be thought necessary for smaller store but seems perfectly reasonable for the range of goods available from a larger store.”

4.32 Whilst case law has moved on slightly since this appeal decision, the conclusions reached in Gloucester remain relevant when applying a goods-led approach.

4.33 In this context, whilst it is acknowledged that alternative sites should not be considered for a specific operator (i.e., retailer blind), it is entirely appropriate to take account of the broad nature of development proposed when assessing the suitability of alternative sites.

4.34 The operator requirements of the type of retailer proposed (a large format discount variety store) is a key consideration in applying the sequential approach. This includes the ability to sell all core goods ranges and of sufficient size that can accommodate all functions that form the business model of the retailer. In allowing B&M to trade from the Application Site, LBH accepted the operational requirements of the proposed occupier of the unit as an important consideration in assessing the suitability of alternative sites.

4.35 Furthermore, it can be confirmed that the Applicant would be agreeable to a condition being imposed to prevent the potential sub-letting of the floorspace proposed for the sale of food and drink.

4.36 In considering these parameters it is noted that the pre-application response raises the potential that Officers are aware of retail units that operate over two storeys, with reference to the existing Asda in Hayes. Officers have therefore suggested that opportunities providing floorspace over multiple floors should also be considered. Such opportunities are not suitable for the nature of retailer proposed. This is reflected by the fact that HB do not trade from multiple levels within their existing portfolio of approximately 600 stores.

4.37 Reference to the Asda in Hayes is also not comparable to the application proposals. This store extends to more than 8,000 square metres, and as a result, is of sufficient size to accommodate a travelator, which enables customers with trollies to access the upper floor. A similar requirement would be necessary for the proposed development given the high number of customers that use trollies. It would therefore be in this context that alternative sites would

¹¹ APP/U1620/A/14/2214917

need to be considered in understanding whether they would be suitable for the proposals. In this respect, very large floorplates would be required.

4.38 Linked to this, when considering alternative sites, it is also important to note that the proposals are extremely modest and seek the re-occupancy of an existing retail unit, and therefore can be delivered quickly. In this respect, whilst the NPPF (para. 87) refers to being available within a 'reasonable period, the PPG¹² advises that:

"When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account." (our emphasis)

4.39 Redevelopment opportunities that would take a substantial period to deliver (which would include sites that could accommodate travelators) do not represent a reasonable alternative to an application that seeks to re-occupy an existing building that is vacant.

4.40 On this basis, following pre-application discussions with Officers at LBH, it has been agreed that it is only necessary to consider existing units / buildings that are vacant and / or capable of refurbishment.

4.41 It is against this background that the sequential approach to site selection has been undertaken.

Sites Considered

4.42 The following sites have been identified and assessed as part of our sequential assessment:

- Former Morrisons, High Street; and
- Other vacant units within and at the edge of Yiewsley – West Drayton district centre.

4.43 Further consideration of the availability and suitability of these sites is provided below.

Former Morrisons, High Street

4.44 The former Morrisons is located off High Street and extends to 3,340 square metres of floorspace provided at ground and first floor levels, with c. 2,453 square metres provided at ground floor. The retail unit also benefits from a surface level and basement car park for approximately 114 vehicles.

4.45 The exiting retail unit is currently vacant and whilst of sufficient size in floorspace terms to accommodate the proposed development, it fails to be able to provide an adjacent external display area, which forms part of the application proposals.

4.46 Furthermore, the site previously benefited from planning permission¹³ for a replacement Morrisons supermarket together with 144 residential apartments. The scheme was amended

¹² Reference ID: 2b-011-20190722

¹³ Ref. 2370/APP/2018/2793

by a planning permission granted on the 8th October 2020 on appeal¹⁴. The Applicant for both applications was Harbourside Investments Limited and WM Morrison Supermarkets Plc.

4.47 A number of pre-commencement conditions were discharged over the prior January 2021 to May 2022. However, this scheme was not advanced due to challenges to redevelop the site, presented by the prevailing economic climate and increased build cost and the permission lapsed in August 2022.

4.48 As a result, a new planning application for this site has been submitted for a revised scheme, which was validated by LBH on the 15th June 2023. This includes the following:

- The delivery of an increased number and types of residential apartments (158no. units); and
- A replacement foodstore of 1,848 square metres to accommodate Morrisons.

4.49 The Applicant for this revised scheme continues to be Harbourside Investments Limited and WM Morrison Supermarkets Plc, illustrating their commitment to deliver this site and for Morrisons to provide a replacement Morrisons.

4.50 Given this continued commitment, and the aspirations of the landowners, this site is not available for the proposed development.

4.51 Notwithstanding this site not being available within a reasonable period of time and there being a retailer formally attached to the current application, the retail unit proposed (at 1,848 square metres) is too small to accommodate the scale of development proposed at the Application Site.

4.52 Overall, this site is not available and suitable for the proposed development.

Other Vacant Units in Yiewsley – West Drayton District Centre

4.53 As with any existing ‘town centre’, there are vacant units within Yiewsley – West Drayton district centre. However, with the exception of the former Morrisons referred to above, these all comprise small floorplates that cannot accommodate the proposed development.

4.54 A full summary of existing vacant units is provided at Table 4.1.

¹⁴ Ref. 2370/APP/2019/2880

Table 4.1: Existing Vacancies within Yiewsley – West Drayton District Centre

Address	Floorspace (square metres)	Address	Floorspace (square metres)
156 High Street	70	74 High Street	70
131 High Street	630	34-36 High Street	440
152 High Street	220	3 Horton Parade	140
140 High Street	70	4 Horton Parade	150
127 High Street	100	15 High Street	90
57-59 Fairfield Road	290	4 Tavistock Road	60
79 High Street	190	Colham Hill Road	230
10 Station Road	190	21 Station Road	70
4 Broadway Parade	90		

Source: Experian Goad (updated following site visit June 2023)

4.55 Existing vacant commercial units (excluding the former Morrisons) all comprise units with small floorplates that cannot accommodate the proposed development – an average size of just 182 square metres at ground floor.

4.56 The largest unit (131 High Street) still only extends to 630 square metres. This quantum of floorspace equates to less than 22% of that being proposed and is simply too small to accommodate the scale of development proposed, or a flexible interpretation of it. In addition this unit also lacks the appropriate at-grade customer car parking and dedicated servicing arrangements necessary for large-format discount retailers of the nature proposed.

4.57 Overall, there is no existing unit (or combination of units) that is of sufficient size to accommodate the proposed development.

Summary

4.58 It has been demonstrated that there is no suitable and available site within a sequentially preferable location that could accommodate the proposals having regard to flexibility, the nature of development, and can address the specific needs the development is intending to meet. This position is consistent with that reached by LBH in allowing B&M to occupy the existing unit, and reflects the pre-application discussions, where Officers confirmed that they were not aware of any sequential alternative to accommodate the application proposals.

5 Trading Effects of Proposed Development

Context

- 5.1 Both the NPPF and London Plan require an impact assessment to be undertaken for retail proposals above a default threshold of 2,500 square metres or any locally set threshold.
- 5.2 Although the retail unit extends to 2,980 square metres, the proposals only seek to extend the quantum of floorspace that can be used for the sale of food and drink products from 240 square metres to 894 square metres – an increase of 654 square metres. This level of floorspace falls well below the default threshold when an impact assessment is required.
- 5.3 However, it is acknowledged that at a local level, Policy DMTC 1 of the Local Plan Part 2 requires an impact assessment for proposals relating to 200 square metres or more of floorspace.
- 5.4 Whilst the uplift in floorspace that will be used for the sale of food and drink exceeds the locally set threshold, the proposals will not lead to an overall increase in retail floorspace – in fact there will be an overall reduction in floorspace at the Application Site.
- 5.5 Instead, any increase in floorspace used for the sale of food and drink will simply replace floorspace that could otherwise be used selling unrestricted non-food goods, which itself will have an impact. This is of relevance given that in assessing retail impact, as acknowledged by the Planning Inspectorate and Secretary of State, this should focus on the centre as a whole, rather than being based on a specific sector or individual retailers. The fact that the Application Site provides an existing retail floorspace with the ability to already sell unrestricted non-food goods together with an element of food and drink represents an important fallback position in the determination of the application proposals.
- 5.6 Notwithstanding this, for completeness the likely trading effects of the proposal has been undertaken. Reflecting the approach advocated by the PPG¹⁵, this has been undertaken in a ‘proportionate and locally appropriate way’ reflecting the nature of development proposed (i.e. reuse of an existing retail unit).
- 5.7 Within this context, when assessing impact, the NPPF (para. 91) states that an application should only be refused where the proposal is likely to have a ‘significant adverse’ impact. The threshold to what is deemed unacceptable is high.
- 5.8 Furthermore, for an impact assessment to be deemed significant adverse, there also needs to be demonstrable evidence. This has been reflected by recent appeal decisions¹⁶, where Inspectors have recognised that there needs to be evidence that any impact is likely to be significant.
- 5.9 Both national planning policy and appeal decisions are clear in that an application should not be refused based on a perceived impact. Instead, there must be some evidence to

¹⁵ Reference ID: 2b-017-20190722

¹⁶ e.g. APP/C1055/A/11/2161815

demonstrate that any impact is likely to be significant adverse. This is an important factor when balancing the effects (both positive and negative) of the proposal. This is particularly important given that the proposals simply seek to re-occupy an existing retail unit.

5.10 In line with national policy we have assessed the proposal against the two tests set out in Paragraph 90 of the NPPF. This requires the consideration of the following potential impacts:

- The impact on existing, committed, and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- The impact 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).

5.11 Both impact tests have been addressed in turn below.

Impact on Planned Investment

5.12 The NPPF (para. 90) is clear in stating that the impact on planned investment relates to centres '*in the catchment area of the proposal*'.

5.13 As previously outlined in addressing the sequential approach to site selection, it is intended that the proposal will principally serve the Yiewsley / West Drayton area. Within this area, the only defined centre is Yiewsley – West Drayton district centre. It is the impact on planned investment within Yiewsley – West Drayton that should be the focus of the assessment.

5.14 In measuring the effect of the development on in centre investment, the PPG¹⁷ advises that:

"Where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:

- the policy status of the investment (i.e. whether it is outlined in the Development Plan)*
- the progress made towards securing the investment (for example if contracts are established)*
- the extent to which an application is likely to undermine planned developments or investments based on the effects on current / forecast turnovers, operator demand and investor confidence."*

5.15 The Secretary of State decision at Rushden Lakes also provides commentary on the 'planned investment' test. Paragraph 8.60 of the Inspector's Report concluded that:

"NPPF [26] requires an assessment of the impact (if any) of the proposal on 'existing, committed and planned public and private investment' in a centre. That requirement is quite straightforward, only investment that has been made, and been committed or is planned warrants consideration. There appears to be general agreement that 'existing' investment

¹⁷ Reference ID: 2b-015-20190722

is to be taken as a reference to investment that has already been made and that 'committed' investment is that which is contractually committed (private) or subject to resolution (public)." (our emphasis)

5.16 Whilst there was disagreement at the Rushden Lakes Inquiry as to what constituted 'planned investment' the Inspector pointed the parties to the advice contained within the December 2009 Practice Guidance. This has now been superseded by the PPG, but the guidance talks about instances where the local planning authority and/or the private sector has identified town centre development opportunities and is 'actively progressing them'. In determining the impact, a list of key considerations is then set out, which is very similar to the PPG commentary, as set out above.

5.17 In this context, we are not aware of any current or committed investment proposals in Yiewsley – West Drayton district centre that the modest proposals may have an unacceptable impact upon.

5.18 For example, the adopted Local Plan Part 2 allocates a number of sites both within and outside the defined District Centre, which comprise the following:

- Kitchener House, Yiewsley (Policy SA 33)
- The Blues Bar, Yiewsley (Policy SA 34)
- Padcroft Works (Policy SA 38)
- Land to the rear of 2-24 Horton Road, Yiewsley (Policy SA 39A)
- 26-36 Horton Road, Yiewsley (Policy SA 40)
- 21 High Street, Yiewsley (Policy SA 41)

5.19 These allocations are largely for mixed-use / residential-led development and are not identified for large-format retailing (as reflected by their planning history). Indeed, whilst retailing is included within some of these developments / allocations, this is for small format retailing, such as within site allocations at The Blues Bar (SA 34); land to the rear of 2-24 Horton Road (SA 39A); and 21 High Street (SA 41)¹⁸.

5.20 The future delivery of these sites will not be undermined by allowing the re-occupation of a longstanding retail unit at the edge of the district centre. Indeed, many of these allocations have or are coming forward for development in the full knowledge that there is an existing large-format retail unit on the Application Site.

5.21 Elsewhere, as previously highlighted, new proposals are being advanced for the demolition of the former Morrisons store on High Street and redevelopment to provide a replacement foodstore and residential units. Again, the long-term implementation of this unit / site will not be undermined by the modest nature of the application proposals. Indeed, Morrisons are the joint applicant for this scheme and continue to be committed to opening a replacement store

¹⁸ As outlined by planning permission 65480/APP/2013/3034; 71582/APP/2016/4582; and 26628/APP/2014/675

in Yiewsley – West Drayton district centre. An operator for the replacement foodstore is secured.

5.22 Overall, there is no existing, committed and planned public and private investment within Yiewsley – West Drayton district centre, which would be adversely impacted upon within the catchment as a result of this application.

Impact on Vitality and Viability

Proposed Turnover

5.23 In this respect, it is important to reiterate that the application proposals are very modest – simply seeking to allow existing floorspace that can currently be used for unrestricted comparison (non-food) goods, to be used for the sale of food and drink products. The retail unit can already be occupied by a range of retailers, which will have an impact.

5.24 In addition, there is no existing restriction preventing internal subdivision. As such, the Application Site could already be occupied by a number of retailers without the need for planning permission.

5.25 The fact that the existing retail unit can already be occupied by a wide range of retailers represents a significant and important fallback position when considering the likely trading effects of the proposal. It is therefore within this context a ‘proportionate’ assessment of the likely trading effects of the proposal on the vitality and viability of neighbouring centres (and on planned investment) needs to be assessed. The potential turnover of the existing unit could be greater than that identified by HB trading from the Application Site – as illustrated by the analysis contained at Table 5.1.

Table 5.1: Potential Turnover – Existing and Proposed

	Gross Floorspace (square metres)	Net Floorspace (square metres)	Assumed Sales Density (£ per square metre)	Turnover (£m)
Existing	3,066	2,759	7,243	19.98
Proposed	2,980	2,682	6,018	16.14
Difference	-86	-77	-1,225	-3.84

*Notes: Net floorspace assumed to be 90% of the gross
Sales density for existing floorspace based on the average sales density of retailers who could trade under the existing restriction as identified by GlobalData (2021). This has been based on the following retailers: Boots (£7,251/sq m); Argos (£7,111/sq m); and JD Sports (£7,368/sq m)
Sales density for HB derived from GlobalData (2021)
At 2021 prices*

5.26 The above analysis demonstrates that the potential turnover of the existing floorspace could be more than £3 million greater than which would result from HB trading from the existing retail unit. This represents a significant fallback position when assessing the likely trading effects of the proposal and is a material consideration when assessing retail impact.

5.27 Given the fallback position and the fact that the bulk of the goods to be sold by HB can already be lawfully sold from the unit, the assessment of impact has focused on the trading effects of the modest uplift in floorspace that will be for the sale of food and drink products. This is identified to represent an increase of up to 654 square metres, which is identified to generate a turnover of just £3.94 million.

Existing Offer and Anticipated Trade Diversion

5.28 When assessing the trading effects of the proposal, the PPG acknowledges the need to assess the potential impact of a scheme against other similar retailers in the area.

5.29 It goes on to state¹⁹ that:

“Retail uses tend to compete with their most comparable competitive facilities.”

5.30 In light of this it is necessary to understand the type of development proposed, and the existing shopping patterns in the local area.

5.31 The proposal comes forward to enable the existing retail unit to be occupied by the large format discount variety retailer HB, which sells non-food goods together with ancillary food and drink products. The principal competitors to HB are similar discount retailers (such as B&M who is currently trading at out-of-centre locations in Hayes and Yeading), the existing HB in Hayes, which is also located out-of-centre, and large-format supermarkets, in particular the large-format Tesco adjacent to the Application Site.

5.32 It is expected that the bulk of the proposal's turnover will be derived from these destinations. Significantly, as these destinations are not located within defined centres, they are afforded no policy protection.

5.33 Within the District Centre, overlapping retailers principally comprise the existing Wilko and Iceland together with the edge-of-centre Aldi. Some trade is expected to be derived from these destinations. However, given the close proximity of the Application Site to the District Centre, any diversion of trade from these stores will still be retained in the local area. There will remain the potential for linked trips to take place between the Application Site and the District Centre.

5.34 Given the competing offer, it is estimated that the proposed development will draw its trade as follows:

- 50% (£1.97 million) – will be drawn from the large edge-of-centre Tesco store adjacent to the Application Site, which will have significant overlap in both the non-food and food and drink product offer.
- 15% (£0.59 million) – will be drawn from the edge-of-centre Aldi store, given the overlapping nature of the discount non-food and food goods.
- 15.0% (£0.59 million) – will be drawn from existing facilities within the District Centre (primary shopping area), including Wilko and Iceland, which have some overlap with HB.

¹⁹ Reference ID: 2b-015-20190722

- 20% (£0.79 million) – will be drawn from similar food and non-food discount retailers and supermarkets beyond the Yiewsley – West Drayton area, the bulk of which are in out-of-centre locations.

5.35 Based on this likely trade draw, the impact of allowing an uplift in floorspace for the sale of food and drink products from the existing retail floorspace on the District Centre will not be significant. Established practice and past Secretary of State decisions have confirmed that the requirement is to consider the impact on a centre as a whole rather than the impact on specific retailers or sub-sectors²⁰. An impact of just -1.7% is identified on the overall retail turnover of the District Centre (**Table 3b at Document 5**).

5.36 This level of impact on the turnover of the centre, spread between a number of retailers, will be insignificant and imperceptible, particularly given the ability for linked trips to take place between the District Centre and the Application Site. Indeed, Yiewsley – West Drayton district centre contains a wider ‘offer’ than just retailing. This includes local services such as hairdressers, restaurants, and estate agents, which collectively account for over half (55%) of existing units²¹.

5.37 Yiewsley – West Drayton is a viable district centre with a good mix of national and independent retailers. Vacancies account for 9.6% of all units²², which is well below the national average (13.9%). Recent residential developments have also increased activity within the District Centre, which will benefit its long-term vitality and viability. In addition, the ongoing proposals to deliver a replacement Morrisons on High Street will further strengthen the District Centre’s role.

5.38 The greatest level of trade diversion is identified to be derived from the existing edge-of-centre Tesco store. This is unsurprising given the overlapping offer and its close proximity to the Application Site. However, the limited diversion identified will not undermine the long-term viability of the Tesco store, and importantly the diverted expenditure will remain within the local area. In terms of impact, given the potential for linked trips to continue to take place between the Application Site and the District Centre, the likely impact (if any) on the long-term vitality and viability of the centre will be negligible.

Consumer Choice

5.39 The NPPF (para. 90) states that the assessment of impact should include consideration of the impact of a proposal on local consumer choice and trade in the ‘town centre’ and wider retail catchment.

5.40 In considering the application, the proposal will improve the choice and distribution of the retail offer in a well-established retail destination that is accessible by a variety of modes of transport. The proposals represent significant private sector investment on a vacant site that has suffered from anti-social behaviour in recent months and will deliver a national retailer not currently represented in Yiewsley-West Drayton. The introduction of HB is likely to claw trade back from comparable stores outside the local area, with residents no longer needing to undertake

²⁰ As confirmed by the Secretary of State decision at Scotch Corner, North Yorkshire (ref. APP/V2723/V/15/313873 and at Tollgate West, Essex (ref. APP/A1530/W/16/3147039)

²¹ Derived from Experian Goad (2022) updated following Quod site visit in June 2023

²² Experian Goad

journeys further afield. The proposed development will draw shoppers to the District Centre, and are likely to deliver significant spin off benefits, by way of linked trips.

5.41 Overall, the development will have the positive effect improving consumer choice and provide a more competitive sector – in line with Government objectives.

Summary

5.42 The proposals are very modest in nature, simply seeking to substitute floorspace that can currently be used for the sale of unrestricted non-food goods for food and drink products. Within this context it has been demonstrated that any impact will be negligible and will not lead to a significant adverse impact (the policy test) on the long-term vitality and viability or planned investment on Yiewsley – West Drayton district centre. Any impact identified with the application proposals will be comparable (and potentially less) than that which can already occur under the fallback position.

5.43 Instead, the proposal will lead to job creation, increased consumer choice and the re-occupancy of a prominent vacant brownfield site. These wider positive impacts associated with the proposal far outweigh any perceived adverse impacts.

6 Other Planning Considerations

Design

6.1 The proposals seek to refurbish an existing, vacant retail unit that has fallen into a state of disrepair and will provide a modern retail unit for a national retailer. The refurnished building will be of high-quality and will be in keeping with the surrounding area and represents a significant improvement to the current position.

The development proposals also include landscaping improvements that will enhance the overall appearance of the Application Site, whilst also contributing to biodiversity and flood risk/drainage improvements. Accordingly, the proposed development complies with Policies DMHB 11 and DMHB 13 of the Hillingdon Local Plan Part 2, and the design requirements of the London Plan.

Transport

6.2 This planning application is supported by a Transport Statement (TS) and Active Travel Zone (ATZ) Assessment prepared by Rappor. This assesses the likely highway impacts of allowing an increase in the quantum of floorspace that can be used for the sale of food and drink.

6.3 The TS concludes that:

"The proposed Home Bargains store will not have a material impact upon the safety or operation of the surrounding local highway network and as such, there are no significant highways and transportation matters that should preclude the Local Planning Authority from approving this planning application."

6.4 The TS also demonstrates the following:

- A review of the local highway network and accident data indicates that there are no inherent / apparent local highway safety issues.
- The Application Site is sustainably located and accessible to a range of services and amenities in addition to public transport linkages.
- Access to the Application Site will be retained via the existing access arrangement. The access conforms to prevailing standards and is considered safe and suitable to serve all users of the store.
- The proposed internal site layout / operation is concluded to be appropriate to serve the Application Site.
- Forecast trip attraction and net trip impact indicates an immaterial change in traffic movements that will not result in a severe impact on the surrounding highway network.

- 6.5 In terms of car parking provision, the proposal includes 120no. spaces, including 14no. EV parking spaces and 19no. disabled access spaces (including 1no. disabled EV space). This represents a reduction in existing car parking (by 9no. spaces) through the removal of the existing car parking spaces adjacent to the River Pinn, which will be removed for additional landscaping and flood mitigation measures. In addition, 20no. cycle spaces will be provided located in 2no. banks of Sheffield stands.
- 6.6 The required level of parking based on Hillingdon's Local Plan, which is informed by the London Plan and the site's PTAL score, where a combination of standards is utilised based on the different uses on-site (i.e. discount food, non-food, garden centre). The level of proposed parking is in accordance with those standards, and the maximum car parking demand sits comfortably within the proposed car park.
- 6.7 The accessibility to the Application Site will also be improved with a new pedestrian access taken off High Street. Within the car park, circulation will be improved through the introduction of tactile paving and pedestrian crossings / walkways.
- 6.8 The proposals therefore comply with DMT1, DMT2 and DMT6 of the Hillingdon Local Plan, and T6 of the London Plan.

Air Quality

- 6.9 Tetra Tech has undertaken an Air Quality Assessment (AQA) to support the application proposals. This demonstrates that the proposed development is not expected to have an adverse impact on air quality.
- 6.10 An Air Quality Positive Statement has also been produced detailing measures within the proposed scheme which are designed to maximise benefits to air quality while also minimising exposure to existing sources of poor air quality. This can be found at Table 9-1 of the submitted AQA.
- 6.11 The proposals accord with Policy SI4 of the London Plan and Policy DMEI 14 of the Hillingdon Local Plan.

Sustainability and Energy

- 6.12 A Sustainability and Energy Statement, incorporating a BREEAM review, has been prepared by Envision to support the proposals. This explains how the scheme will meet the relevant energy and sustainability policies and concludes that:

"the scheme involves the reuse of the former B&M unit existing superstructure and sub structure - two elements which are associated with the highest embodied carbon of a construction project. In addition, the scheme will incorporate a range of energy saving measures and is to achieve a 89.44% reduction in carbon emissions and 93.53% reduction in primary energy compared to a notional existing building baseline."

- 6.13 Overall, it is demonstrated that the development complies with Policy DMEI 2 of the Hillington Local Plan and Policy SI2 of the London Plan.

Flood Risk and Drainage

6.14 Rappor have produced a Flood Risk Assessment to support the application. The bulk of the Site is situated within Flood Zone 2, although a small part of the north boundary of the Site extends into Flood Zone 3a. The assessment concludes that:

"In compliance with the requirements of the National Planning Policy Framework, and subject to the mitigation measures proposed, the development will not cause or be subject to significant flood risk issues."

6.15 It is noted that recent application²³ for a health facility and residential development was dismissed on appeal, was due, in part, to drainage and flood risk issues. There are significant differences between the current application proposals and the previous scheme. These include:

- This application principally relates to the reuse of an existing building for continued retail use, whereas the dismissed scheme sought the comprehensive redevelopment of the Site for an alternative use.
- The proposals relate to a retail use, which is classed as development that is 'less vulnerable' to flood risk, whereas residential and a health facility – as previously proposed – are deemed to be 'more vulnerable' and subject to additional requirements when addressed flood risk and drainage matters.

6.16 Within this context there are significant differences between the dismissed scheme and the current proposals. As such, the reasons identified in dismissing the previous scheme are not applicable in the consideration of the current proposals.

6.17 As the proposals do not to change the footprint of the building with no increase in hardstanding, there will be no change to the existing surface water drainage regime or the level of surface water runoff. On this basis, the existing drainage network is to be retained and no further measures are required.

6.18 Within this context, the proposals accord with Policy EM6, and DME9 of the Hillingdon Local Plan and Policy SI12 of the London Plan.

Landscaping and Ecology

6.19 In recognition of comments received at the pre-application stage, the application submission is supported by a Landscaping and Ecological Enhancement Scheme, prepared by Encon Associates.

6.20 The existing landscaping will be largely retained but will seek to undertake the recommended works. The application does not propose to remove any of the existing trees and proposes 15no. new trees to be planted along the Site frontage and adjacent to the River Pinn. A green

²³ Ref. 68663/APP/2020/705

buffer including wildflowers shrubs and hedges will also provide screening along the Site frontage on High Street in line with Officer's recommendations at pre-application stage. The scheme has been designed so that the planting seeks to maximise ecological value to encourage pollinators and wildlife.

6.21 Along the River Pinn, a native hedgerow with specimen hedgerow trees will provide a green buffer. This new landscaping will have a positive impact on the Application Site and lead to significant aesthetic enhancements.

Other Considerations

6.22 Although the Site extends into Archaeological Priority Area, the nature of the proposals (principally the reuse of the building with no change to the hardstanding) means that archaeology is not a consideration in the determination of the application.

6.23 This conclusion is further supported by the comments made by Historic England in determining the dismissed residential scheme, which identified that any archaeological value on the Site would be at 'notable depths'.

6.24 The application proposals also seek to extend the delivery hours beyond that which are currently permitted (currently restricted to 0800 to 1800 hours Monday to Friday; 0800 to 1300 hours on Saturdays and at no time on Sundays and Bank Holidays). In considering the potential implications of wider delivery hours, the existing and proposed servicing arrangements are located away from sensitive receptors in a location that already contains commercial uses. Any impact of allowing increased delivery hours would not lead to significant adverse impacts on neighbouring uses.

Summary

6.25 The application proposals are modest in nature and give rise to limited development management considerations. However, all relevant development management considerations have been assessed and the supporting technical reports provide further justification for the development. Overall, it has been demonstrated that the proposed development complies with the development plan.

7 Scheme Benefits

- 7.1 There are a number of headline benefits arising from the application proposals. This includes the creation of local employment opportunities, with the creation of up to 120no. new full and part-time jobs.
- 7.2 This level of job creation is significant given the current state of the Site and there will be tangible positive impacts on local employment. TJM seek to reach out to local residents when recruiting staff for their store. Therefore, the area within which the new store is proposed could garner significant benefits. HB prides itself on supporting its staff to grow and progress through the company. This means that an entry-level role can lead to a management position if the individual has the drive and ambition to succeed.
- 7.3 In addition to job creation, the proposals will improve choice and competition in the local area, introducing a new retailer in a location that has previously been identified as appropriate for large-format retailing.
- 7.4 HB is a discount retailer selling good quality items at low prices. Affordable access to good quality everyday goods is more important now than ever given the cost-of-living issues that people throughout the UK are increasingly facing.
- 7.5 The fit-out works will also result in further job creation and investment in the local economy. Spin-off benefits will arise from this for the local economy in addition to the increase in local wages and gross value added. This is particularly important given that the site is currently vacant, in a poor condition and makes no positive economic contribution.
- 7.6 The re-use of the Application Site will lead to qualitative improvements to the area, including aesthetic enhancements to a prominent brownfield site on a main arterial route through the borough.
- 7.7 The refurbished unit will also provide improved sustainability credentials including a range of new energy saving measures such as new heat pumps and PV panels, which will help reduce carbon emissions and make the unit more energy efficient. Indeed, the development will achieve an 89.44% reduction in carbon emissions and 93.53% reduction in primary energy compared to the existing building baseline.
- 7.8 As highlighted, the proposals being advanced principally seek the reuse and refurbishment of existing retail floorspace, rather than the creation of new buildings. Such an approach is in line with the recommendations of the House of Commons Environmental Audit Committee, who has identified that the retrofit and reuse of buildings should be prioritised over new buildings to reduce the UK's carbon emissions²⁴. The proposals will accord with this important Government priority.
- 7.9 Overall, the headline benefits arising from the proposals can be summarised as follows:

²⁴ Building to Net Zero: Costing Carbon in Construction' Report (May 2022)

- Creation of up to 120no. new and part time jobs.
- Estimated increase in Gross Value Added capital.
- Further job creation through construction, security and maintenance.
- Substantial private sector investment in the local economy.
- Increased consumer choice and competition.
- The collection of increased business rates, some of which will be available to the local authority.
- Redevelopment and improvement of a prominent brownfield site that has suffered from anti-social behaviour in recent months and is in a poor state of repair.

7.10 These economic benefits should be afforded significant weight in the determination of the application, particularly given the lack of significant adverse impacts resulting from the proposal.

8 Summary & Conclusions

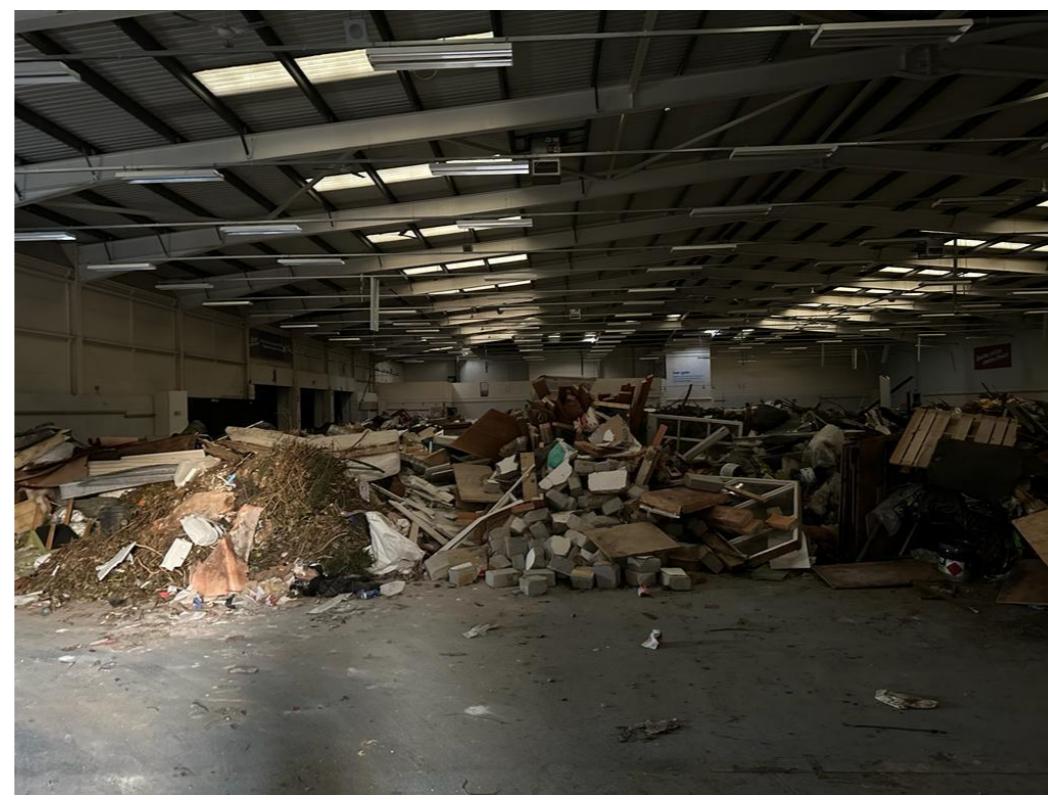
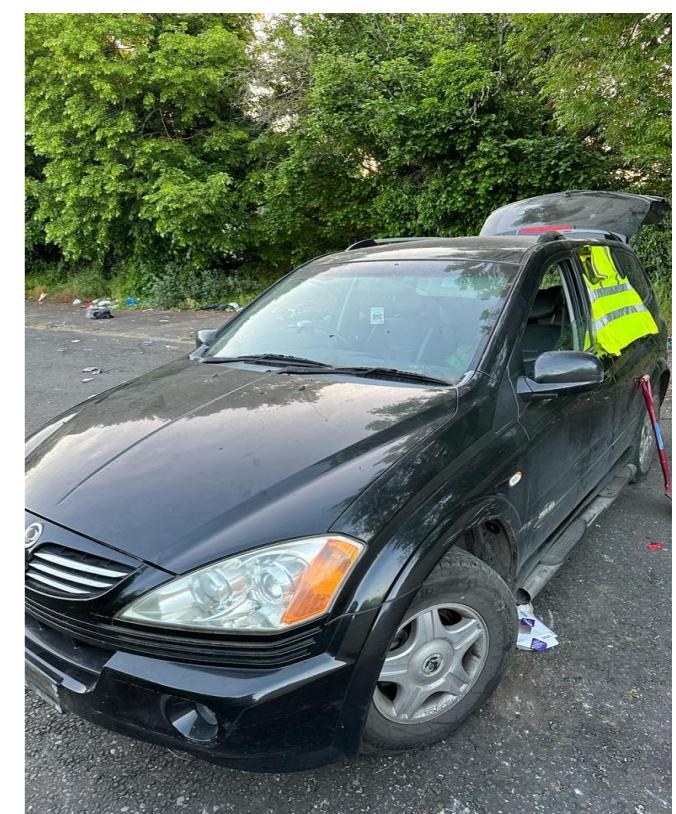
- 8.1 This PRA has been prepared on behalf of TJ Morris Limited in support of the proposals for modest external changes and refurbishment of the former B&M unit at 217 High Street, Yiewsley.
- 8.2 The proposals, if approved, will facilitate occupation of the vacant unit by Home Bargains, continuing the site's historic retail use. Whilst the proposed physical changes are modest, the proposed reoccupation of the site by HB will lead to substantial benefits for the local area. This includes job creation, improved consumer choice, and re-use of an underutilised site that provides an unattractive gateway to Yiewsley – West Drayton district centre.
- 8.3 The principle of retail use (including a large-format discount variety retailer) is long established and no change of use, nor overall increase in retail floorspace is proposed. However, it is acknowledged that a widening of the goods currently permitted to be sold is proposed. This will allow an increase in the quantum of existing floorspace that can be used for the sale of food and drink products. Although not within a defined centre, the proposed widening of the goods permitted to be sold will be acceptable as it is demonstrated that no sequential alternative exists and will not lead to a significant adverse impact.
- 8.4 With regard to impact, no increase in overall retail floorspace is proposed. In fact, as a result of the proposals there will be a net reduction in floorspace. Furthermore, although an uplift in floorspace that can be used for the sale of food and drink is sought, the proposals simply substitute floorspace that can currently be used for the sale of unrestricted non-food goods (which itself will have an impact) for food and drink products. Any impact, which is identified to be negligible is anticipated to be comparable, or even less, than that which could occur under the existing arrangements. It is within this context a proportionate impact assessment has been undertaken – as advocated by the PPG – and it has been demonstrated that any impact is unlikely to be significant adverse (the policy test).
- 8.5 Against this background, it is demonstrated that the proposals are in accordance with relevant retail planning policy.
- 8.6 Likewise, full consideration has been given to a wide range of other development management issues. These are covered in detail within the supporting technical reports, and compliance with the development plan and national planning policy has been demonstrated.
- 8.7 Instead, the proposals will deliver substantial benefits, including job creation, private sector investment, improved consumer choice and the re-occupancy of a prominent brownfield site that is in a poor state of repair. These benefits should be afforded significant weight in the overall planning balance.
- 8.8 For all the reasons set out within this report and the supporting documents, the proposals comprise a sustainable economic development, the principle of which is supported by national and local planning policy. The proposals accord with the development plan and, applying the presumption in favour of sustainable development, planning permission should be granted without delay.



Document 1

Photographic evidence of anti-social behaviour occurring on the Site

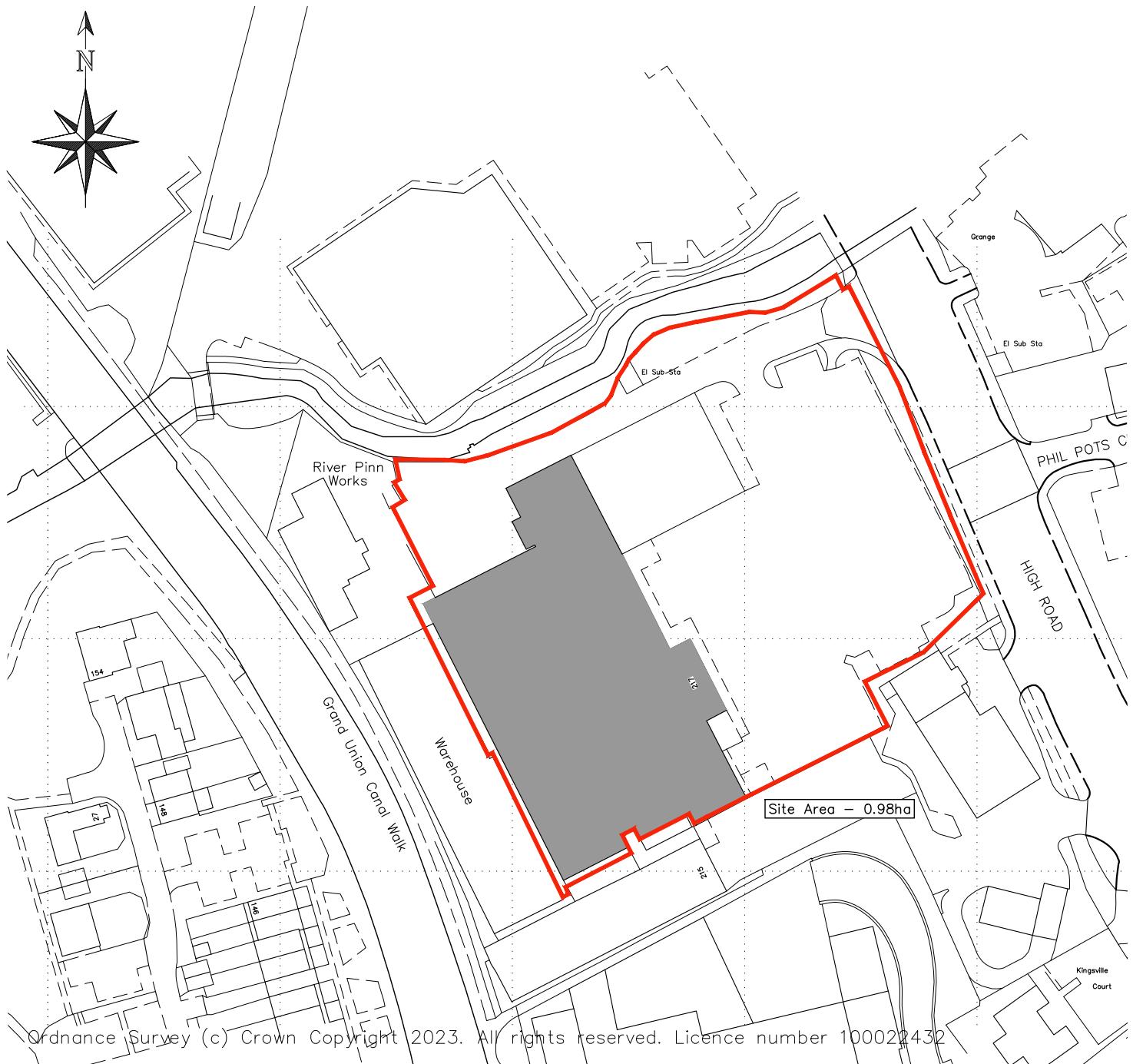
Document 1: Photographic Evidence of anti-social behaviour within the Site





Document 2

Site Location Plan



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

REV. DATE AMENDMENT

PROJECT No:

9864

SCALE:

1:1250@A4

DRAWING No:

LC01

DATE:

March 23

REVISION:

DRAWN BY:

CHECKED BY:

DATE:



Document 3

Copies of Relevant Decision Notices



London Borough of Hillingdon, Civic Centre, Uxbridge UB8 1UW.
Local Services, Tel: 0895 250111 Fax: 0895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

To:

The Louis de Soissons Partnership
Shoot Lodge
Wandon Green, Bedfordshire
LU2 8PH

The Louis de Soissons Partnership
9 JAN 1995
W.G.C

Ref: 41515B/93/606		
DAH		
ADFL	✓	
OAML		
BC	✓	
JEH		

The Council of the London Borough of Hillingdon as the Local Planning Authority within the meaning of the above mentioned Act and Orders made thereunder hereby GRANT permission for the following development:-

Description of development:-

Erection of a D.I.Y. store and garden centre with associated parking and landscaping and construction of a vehicular access and kerb realignment (involving demolition of existing building)

Location of development:-

Sadia Works, High Street, Yiewsley

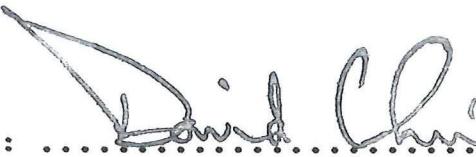
Date of application:-

19 March 1993

Drawing/plan Nos:-

8718/P/5, 8718/P/6 received 15 April 1993, 17080/02 received 6 July 1993 & 8718/P/4 Rev L received 1 December 1994 and letters dated 28 June, 2 & 6 July 1993

Permission however is given subject to the conditions listed on the attached schedule:-

Signed: 
HEAD OF PLANNING SERVICES

Date: 5 January 1995

2

NOTES:

- (i) If you wish to appeal against any of the conditions please read the attached sheet which explains the procedure
- (ii) This decision does not purport to convey any approval or consent which may be required under any by-laws, building regulations, or under any enactment other than the Town & Country Planning Act 1990.



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Local Services, Tel: 0895 250111 Fax: 0895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 1

Ref: 41515B/93/606

CONDITION 1

The development hereby permitted shall be begun before the expiration of five years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

CONDITION 2

Prior to any work commencing on site an accurate survey plan at a scale of not less than 1:200 shall be submitted to and approved by the Local Planning Authority. The plan must show:-

- (i) Position, height, species, condition and branch spread of all existing trees, shrubs and hedges on and immediately adjoining the site.
- (ii) A clear indication of trees, hedges and shrubs to be retained and removed.
- (iii) Existing and finished site levels.
- (iv) Routes of any existing or proposed underground works and overhead lines including their manner of construction.

REASON

To enable the Local Planning Authority to assess the amenity value of existing trees, hedges and shrubs and the impact of the proposed development on them.

CONDITION 3

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior consent of the Local Planning Authority (LPA).

Any trees, hedges and shrubs being severely damaged during construction, seriously diseased or dying shall be replaced by one of a size and species to be agreed in writing with the LPA. Where damage is less severe a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the LPA. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'.



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Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 2

Ref: 41515B/93/606

Remedial work should be carried out to BS 3998 (1989) 'Recommendations for Tree Work' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. Such work or planting shall be completed within 8 months of the commencement of the development or such period as agreed in writing by the LPA.

REASON

The trees and other vegetation makes a valuable contribution to the amenity of the area and to comply with Section 197 of the Town and Country Planning Act 1990.

CONDITION 4

Prior to works commencing on site detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, groups of trees and other vegetation to be retained during construction work, shall be submitted to and approved by the Local Planning Authority. Such fencing should be a minimum height of 1.5 metres and shall be erected prior to any demolition, removal of topsoil and commencement of building operations and retained in position until development is completed. The land so enclosed shall be kept clear of all dumping, materials, machinery and cement mixing and the existing soil levels not altered or disturbed. No fires shall be lit on the land so enclosed.

REASON

To ensure that trees and other vegetation to be retained are not damaged during construction work.

CONDITION 5

Details of the arrangements to ensure the continued maintenance of all landscaped areas within the development shall be submitted to and approved in writing by the Local Planning Authority before any part of the approved development is commenced.

REASON

To ensure that the landscaping carried out is properly maintained and that the Local Planning Authority are aware of all or any piece of land within the development.



London Borough of Hillingdon, Civic Centre, Uxbridge UB8 1UW.
Local Services, Tel: 0895 250111 Fax: 0895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 3

Ref: 41515B/93/606

CONDITION 6

Before any part of the approved development is commenced a landscaping scheme shall be submitted to and approved by the Local Planning Authority.

REASON

To ensure that the proposed development makes a satisfactory contribution to the preservation and enhancement of the visual amenity of the locality.

CONDITION 7

All planting, seeding and turfing in the approved landscaping scheme shall be completed within eight months of development commencing (or such period as agreed in writing by the Local Planning Authority) or prior to occupation of the building(s) whichever is the earlier period. The new planting and landscape operations should comply with the requirements specified in BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs' and in BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. Thereafter areas of amenity space shall be permanently retained and any trees or other planting which die within a period of 5 years from the completion of development, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species in accordance with the details approved by the Local Planning Authority.

REASON

To ensure that the proposed development makes a satisfactory contribution to the preservation and enhancement of the visual amenities of the locality.

CONDITION 8

The parking areas (including where appropriate the marking out of parking spaces) shown on the approved plans shall be constructed prior to occupation of the development, thereafter permanently retained and used for no other purpose.

REASON

To ensure that adequate facilities are provided.



Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 4

Ref: 41515B/93/606

CONDITION 9

The roads/turning/loading facilities/sight lines and parking areas (including the marking out of parking spaces) shown on the approved plans shall be constructed prior to occupation of the development thereafter permanently retained and used for no other purpose.

REASON

To ensure that adequate facilities are provided.

CONDITION 10

Unobstructed visibility shall be provided for and permanently maintained above a height of 0.9 metres from footway level within 4.5 metre x 60 metre sight lines on both sides of the point of vehicular access.

REASON

To ensure that pedestrian and vehicular safety is not prejudiced.

CONDITION 11

Development shall not begin until details and/or samples of all materials, colours and finishes to be used on all external surfaces have been submitted to and approved by the Local Planning Authority.

REASON

To ensure that the development presents a satisfactory appearance.

CONDITION 12

Where external machinery/equipment or external openings are proposed, details of the siting and sound insulation of such works (for example, refrigeration and air conditioning, ventilation units, air intake louvres, ducting, chimneys, mechanical extraction and disposal of fumes, dust and grit) shall be submitted to and approved by the Local Planning Authority, implemented before the use hereby approved is commenced, and thereafter permanently retained. The noise emitted from such equipment should be inaudible in the nearest residence and be in compliance with BS4142/BS8223.

REASON

To ensure that the use does not detract from the amenities of local residents.



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Local Services, Tel: 0895 250111 Fax: 0895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 5

Ref: 41515B/93/606

CONDITION 13

This site is within an area of historic importance where ground works will result in the destruction of archaeological remains. The applicant shall therefore provide access to allow these remains to be archaeologically investigated, excavated and recorded prior to redevelopment by an approved authority acceptable to the Local Planning Authority. In this respect the applicant shall follow the provisions of the Code of Practice agreed between the British Property Federation and Standing Conference of Archaeological Unit Managers. No construction work shall be commenced until this condition has been complied with to the satisfaction of the Local Planning Authority.

REASON

The site is of archaeological interest and it is considered that all evidence of the remains should be recorded.

CONDITION 14

Notwithstanding the provisions of Section 55 of the Town and Country Planning Act 1990 no additional internal floorspace shall be created in excess of that area expressly authorised by this permission.

REASON

To enable the Local Planning Authority to assess all the implications of the development and to ensure that adequate parking and loading facilities can be provided on the site.

CONDITION 15

Before any part of this development is commenced, details of a scheme for the disposal of surface water and sewage shall be submitted to and approved by the Local Planning Authority.

All works which form part of this scheme shall be carried out before any part of the approved development is occupied (unless otherwise agreed in writing by the Local Planning Authority).

REASON

To ensure that the proposed development does not give rise to an increased risk of flooding, nor to an overloading of the sewage disposal system in the locality.



Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 6

Ref: 41515B/93/606

CONDITION 16

Surface water discharge from the development will be restricted and on-site storage shall be provided. The method of assessment of storage to be determined by the Local Planning Authority.

The mode of storage and flow restriction shall be submitted to and approved by the Local Planning Authority. All works which form part of this approved scheme shall be carried out before any part of the approved development is occupied (unless otherwise agreed in writing by the Local Planning Authority).

REASON

To ensure that the proposed development does not exacerbate an existing flooding problem or cause a new flooding problem.

CONDITION 17

Before any part of the approved development is commenced, details of the fencing or other means of enclosure shall be submitted to and approved by the Local Planning Authority. Such fencing shall be completed within 6 months of development commencing and thereafter permanently retained.

REASON

To ensure that the proposed development makes a satisfactory contribution to the preservation and enhancement of the visual amenity of the locality.

CONDITION 18

All facilities provided and designed specifically for people with disabilities shown on the approved plans (to include, where appropriate to this application, reserved/specifically designed parking spaces; ramped kerbs; ramped/level approaches to building entrances; types and dimensions of door and lobby openings at building entrances; toilet facilities) shall be provided prior to the occupation of the development and thereafter permanently retained.

REASON

To ensure that adequate facilities are provided for people with disabilities.



London Borough of Hillingdon, Civic Centre, Uxbridge UB8 1UW.
Local Services, Tel: 0895 250111 Fax: 0895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 7

Ref: 41515B/93/606

CONDITION 19

Storage within the ancillary garden centre shall not exceed the wall enclosing this space.

REASON

To ensure that the development presents a satisfactory appearance and to safeguard the visual amenity of the locality.

CONDITION 20

The premises shall be used for a DIY store with ancillary garden centre and for no other purpose (including any other purpose in Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987).

REASON

For the avoidance of doubt and to accord with the terms of the planning application.

CONDITION 21

There shall be no deliveries to the store outside of the following hours:- Mondays to Fridays between 0800 hours to 1800 hours; Saturdays between 0800 hours to 1300 hours and at no time on Sundays and Bank Holidays.

REASON

To safeguard the residential amenity of nearby properties.

CONDITION 22

For a period of 5 years commencing upon certification of practical completion of the development hereby permitted by the Local Planning Authority, the development hereby permitted shall only be used by Great Mills (Retail) Limited.

REASON

In accordance with the supporting correspondence on behalf of the applicants dated 14 October, 19 October 1993 and 22 February 1994 and in accordance with the special circumstances that the applicants have presented in support of the proposal.

RIGHTS OF APPLICANTS AGGRIEVED BY DECISION OF LOCAL PLANNING AUTHORITY

Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State for the Environment under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal, then you must do so within six months of the date of this notice, using a form which you can get from the Department of the Environment at Tollgate House, Houlton Street, Bristol BS2 9DJ.
- The Secretary of State can allow a longer period of giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions it imposed, having regard to the statutory requirements, to the provisions of the development order and to any directions given under the order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based its decision on a direction given by him.

Purchase Notices

- If either the local planning authority or the Secretary of State for the Environment refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor can he render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Compensation

- In certain circumstances compensation may be claimed from the local planning authority if permission is refused or granted subject to conditions by the Secretary of State on appeal or on reference of the application to him.
- These circumstances are set out in section 114 and related provisions of the Town and Country Planning Act 1990.



London Borough of Hillingdon, Civic Centre, Uxbridge, Middlesex UB8 1UW.

Local Services, Tel: 01895 250111 Ext.

Fax: 01895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

To:

Ref: 41515T/96/1111

Littman and Robeson (ref. Ms C Davies)
14 Buckingham Street
London
WC2N 6DF

The Council of the London Borough of Hillingdon as the Local Planning Authority within the meaning of the above mentioned Act and Orders made thereunder hereby GRANT permission for the following development:-

Description of development:-

Variation of condition 20 (relating to restrictions on goods) of planning permission ref. 41515B/93/606 dated 05/01/96; Erection of DIY store and garden centre with associated parking and landscaping and construction of a vehicular access

Location of development

Great Mills, 217 High Street,
Yiewsley

Date of application:-

17 July 1996

Drawing/plan Nos:-

LR1 received 19 July 1996 and
letter dated 17 July 1996

Permission however is given subject to the conditions listed on the attached schedule:-

Signed:-

HEAD OF PLANNING SERVICES

Date:- 2 October 1996

NOTES: (i) If you wish to appeal against any of the conditions please read the attached sheet which explains the procedure.

(ii) This decision does not purport to convey any approval or consent which may be required under any by-laws, building regulations, or under any enactment other than the Town and Country Planning Act 1990.



London Borough of Hillingdon, Civic Centre, Uxbridge, Middlesex UB8 1UW.

Local Services, Tel: 01895 250111 Ext.

Fax: 01895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

Continuation Sheet No. 1

Ref: 41515T/96/1111

CONDITION 1

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 (as amended).

REASON

To accord with Policy S1B of the Draft Unitary Development Plan as proposed to be modified and to protect the vitality of the adjacent town centre.

INFORMATIVE:

The applicant is advised that paragraph 8.6 of the S106 Agreement preventing the retail sale of food still applies.

A handwritten signature in black ink, appearing to read 'David Chinn'.

HEAD OF PLANNING SERVICES

2 October 1996



London Borough of Hillingdon, Civic Centre, Uxbridge, Middlesex UB8 1JW.

Local Services. Tel: 01895 250111 Ext.

Fax: 01895 250830

Town and Country Planning Act 1990

GRANT OF PLANNING PERMISSION

To:

Ref: 41515W/96/1778

Littman & Robeson (ref: CLD/aw/263/LH170796)
14 Buckingham Street
London
WC2N 6DF

The Council of the London Borough of Hillingdon as the Local Planning Authority within the meaning of the above mentioned Act and Orders made thereunder hereby GRANT permission for the following development:-

Description of development:-

Removal of condition 22 (personal permission) of planning permission ref: 41515B/93/606 dated 05/01/95; Erection of D.I.Y. store and garden centre with associated parking and landscaping and construction of a vehicular access and kerb realignment

Location of development

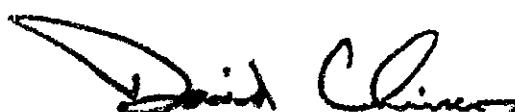
Great Mills, 217 High Street,
Viewsley

Date of application:-

15 November 1996

Drawing/plan Nos:-

LR1 received 19 November 1996
and letters dated 19 November, 5
December 1996 and 18 July 1997

Signed: - 
HEAD OF PLANNING SERVICES

Date: - 6 August 1997

NOTE: (i) This decision does not purport to convey any approval or consent which may be required under any by-laws, building regulations, or under any enactment other than the Town and Country Planning Act 1990.



Mr Tim Rainbird
Quod
Ingeni Building
17 Broadwick Street
London W1F 0AX

Application Ref: 68663/APP/2012/1706

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

GRANT OF PLANNING PERMISSION

The Council of the London Borough of Hillingdon as the Local Planning Authority within the meaning of the above Act and associated Orders **GRANTS** permission for the following:-

Description of development:

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). (Section 73 Application).

Location of development: Former Focus Unit, 217 High Street Yiewsley

Date of application: 17 July 2012

Plan Numbers: See attached Schedule of plans

Permission is subject to the condition(s) listed on the attached schedule:-

A handwritten signature in black ink that reads 'James Rodger'.

Head of Planning & Enforcement

Date: 19 March 2013

NOTES:

- (i) Please also see the informatics included in the Schedule of Conditions.
- (ii) Should you wish to appeal against any of the conditions please read the attached sheet which explains the procedure.
- (iii) This decision does not convey any approval or consent which may be required under any by-laws, building regulations or under any Act other than the Town and Country Planning Act 1990 (as amended).

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

GRANT OF PLANNING PERMISSION

Application Ref: 68663/APP/2012/1706

SCHEDULE OF CONDITIONS

- 1 · The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

- 2 · Notwithstanding the provisions of Section 55 of the Town and Country Planning Act 1990 (or any others revoking and re-enacting this provision with or without modification), no additional internal floorspace shall be created in excess of that area expressly authorised by this permission.

REASON

To enable the Local Planning Authority to assess all the implications of the development and to ensure that adequate parking and loading facilities can be provided on the site, in accordance with Policies AM14 and AM15 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and Policies 4.7 and 4.8 of the London Plan (2011).

- 3 · 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.

REASON

To accord with the National Planning Policy Framework and to protect the vitality and viability of the adjacent town centre

INFORMATIVES:

- 1 · You are advised that the application relates to permission for Use Class A1 only. Planning Permission would be required for any change of use of the property to other uses within Class A (including use classes A2 - A5).

END OF SCHEDULE

Address:

Planning, Environment, Education & Community

Services

London Borough of Hillingdon

3 North Civic Centre, High Street, Uxbridge UB8 1UW

Tel: 01895 250230

GRANT OF PLANNING PERMISSION

Application Ref.No.: 68663/APP/2012/1706

SCHEDULE OF PLANS

Retail Assessment July 2012 Ref: Q20231 - received 17 Jul 2012

Q20231 Location Plan - received 17 Jul 2012



Document 4

Pre-application correspondence with the London Borough of Hillingdon



Will Tucker
21 Soho Square
London
W1D 3QP

Planning Applications Team
Hillingdon Council
Civic Centre, High Street
Uxbridge UB8 1UW

Tel: 01895 250230
Case Officer: Michael Briginshaw
Email: mbriginshaw1@hillingdon.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 (2,972m² 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 2,500m² 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 50m² 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 to 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 NOx 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 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.

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 100m² 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

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@hillingdon.gov.uk & nkelly@hillingdon.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.

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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 in 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.



Document 5

Retail Tables

Table 1a: Existing Floorspace & Turnover (Convenience Goods)

Location	Gross Floorspace (square metres)	Net Floorspace (square metres)	Net Conv. Floorspace (square metres)	Sales Density (£ per sq m)	Turnover (£m)
<u>Yiewsley - West Drayton town centre</u>					
Iceland, High Street	810	567	510	7,022	3.58
Other	4,812	3,850	3,657	5,000	18.29
Sub-total	5,622	4,417	4,167	-	21.87
<i>Edge-of / out-of-centre</i>					
Tesco, High Street	7,978	5,174	2,587	14,198	36.73
Aldi, High Street	1,825	1,258	1,006	11,487	11.56
Tesco Express, Station Road	359	250	238	14,198	3.37
Total	15,784	11,099	7,998	-	73.53

Notes:

1. Existing floorspace taken from relevant planning applications, LB Hillingdon retail evidence, site visits and Quod assumptions
2. Sales densities derived from GlobalData (2022)
3. Turnover = net conv. Floorspace x sales density
4. At 2021 prices

Table 1b: Existing Floorspace & Turnover (Comparison Goods)

Location	Gross Floorspace (square metres)	Net Floorspace (square metres)	Net Conv. Floorspace (square metres)	Sales Density (£ per sq m)	Turnover (£m)
<u>Yiewsley - West Drayton town centre</u>					
Iceland, High Street	810	567	57	2,310	0.13
Other	4,924	3,939	3,939	3,000	11.82
Sub-total	5,734	4,506	3,996	-	11.95
<i>Edge-of / out-of-centre</i>					
Tesco, High Street	7,978	5,174	2,587	8,158	21.10
Aldi, High Street	1,825	1,258	252	8,278	2.08
Total	13,712	9,680	6,583	-	35.14

Notes:

1. Existing floorspace taken from relevant planning applications, LB Hillingdon retail evidence, site visits and Quod assumptions
2. Sales densities derived from GlobalData
3. Turnover = net conv. Floorspace x sales density
4. At 2021 prices

Table 2: Potential Turnover of Proposal

	Floorspace (sq m)	Sales Density (£ per sq m)	Overall Turnover (£m)
Proposal (uplift in food and drink only)	654	6,018	3.94

Notes:

1. Sales density derived from GlobalData
2. Turnover = floorspace x sales density
3. At 2021 prices

Table 3a: Trading Effects of the Proposal (Convenience only)

Location	Turnover Pre-development		Trade Diversion to Proposal		Turnover Post Development (2028) (£m)	Impact
Proposal	2023 (£m)	2028 (£m)	(%)	2028 (£m)	3.94	
<u>Yiewsley - West Drayton town centre</u>						
Iceland, High Street	3.58	3.70	1.0%	0.04	3.66	-1.1%
Other	18.29	18.87	14.0%	0.55	18.32	-2.9%
Sub-total	21.87	22.57	15.0%	0.59	21.98	-2.6%
<i>Edge-of / out-of-centre</i>						
Tesco, High Street	36.73	37.91	50.0%	1.97	35.94	-5.2%
Aldi, High Street	11.56	11.93	15.0%	0.59	11.34	-4.9%
Tesco Express, Station Road	3.37	3.48	0.0%	0.00	3.48	0.0%
Elsewhere			20.0%	0.79		
Total	-	-	100.0%	3.94	-	-

Notes:

1. Turnover pre development taken from Table 1a and rolled forward in line with the latest sales efficiencies identified by Experian (Retail Planner Briefing Note 20, February 2023)
2. Trade diversion to proposal based on professional assumptions informed by existing shopping patterns, local geography and the nature of the proposed retail offer and competing provision
3. Turnover of proposal taken from Table 2
4. Turnover post development = turnover pre development minus trade diversion to proposal
5. Impact = turnover proposal expressed as a proportion in the reduction in turnover should no development come forward
6. At 2021 prices

Table 3b: Trading Effects of the Proposal (Convenience & Comparison)

Location	Turnover Pre-development		Trade Diversion to Proposal		Turnover Post Development (2028) (£m)	Impact
Proposal	2023 (£m)	2028 (£m)	2028 (£m)	3.94		
<u>Yiewsley - West Drayton town centre</u>						
Iceland, High Street	3.71	3.90	0.04	3.86	-1.0%	
Other	30.10	31.58	0.55	31.02	-1.7%	
Sub-total	33.82	35.47	0.59	34.88	-1.7%	
<i>Edge-of / out-of-centre</i>						
Tesco, High Street	57.83	60.66	1.97	58.70	-3.2%	
Aldi, High Street	13.64	14.31	0.59	13.72	-4.1%	
Tesco Express, Station Road	3.37	3.54	0.00	3.54	0.0%	
Elsewhere			0.79			
Total	-	-	3.94	-	-	-

Notes:

1. Turnover pre development taken from Table 1a and Table 1b rolled forward in line with the latest sales efficiencies identified by Experian (Retail Planner Briefing Note 20, February 2023)
2. Trade diversion to proposal based on professional assumptions informed by existing shopping patterns, local geography and the nature of the proposed retail offer and competing provision
3. Turnover of proposal taken from Table 2
4. Turnover post development = turnover pre development minus trade diversion to proposal
5. Impact = turnover proposal expressed as a proportion in the reduction in turnover should no development come forward
6. At 2021 prices