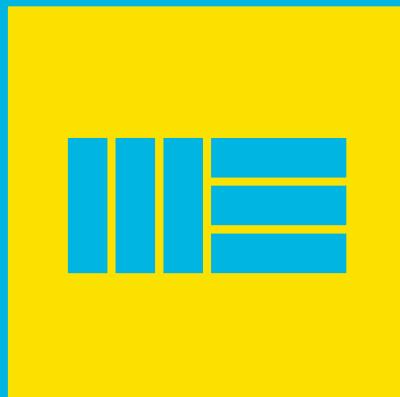


# **LONDON BOROUGH OF HILLINGDON**

**LAND AT YIEWSLEY LIBRARY, FALLING  
LANE AND FORMER YIEWSLEY POOL,  
OTTERFIELD ROAD, YIEWSLEY**

**PLANNING STATEMENT**

**SEPTEMBER 2023**



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# 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application (“the Application”) for Full Planning Permission by the London Borough of Hillingdon ('LBH') (the 'Applicant') for the comprehensive redevelopment of two parcels of land, one at Yiewsley Library, Falling Lane (hereafter referred to as the Falling Lane Site (FL Site) and the other at Former Yiewsley Pool, Otterfield Road (hereafter referred to as the Otterfield Road Site (OR Site), both collectively known as the 'Sites' for the purposes of this Statement. A Sites Location Plan (redline boundary) is submitted as part of this application identifying both parcels of land.

1.2 This application seeks Full Planning Permission for the following formal description of development:

*“Demolition of existing Yiewsley Library Building and the erection of a new residential building on the Yiewsley Library site (Falling Lane) and the erection of a new mixed use building on the former Yiewsley Swimming Pool site (Otterfield Road), with a replacement library at ground floor level and residential uses above”.*

1.3 A more detailed description of development for public consultation purposes is as follows:

*“Demolition of existing Yiewsley Library Building and the erection of a 4-storey residential building, comprising 50 dwellings, with 28 undercroft parking spaces (13 for residential and 15 for use by Rabbsfarm Primary School). The Otterfield Road site proposes the erection of a 5-storey building, comprising 45 dwellings, with 25 car parking spaces (23 for residential and 2 for library users).”*

## PURPOSE AND FORMAT OF THE PLANNING STATEMENT

1.4 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.

1.5 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the application have been taken into account in informing the evolution of the scheme design. This assessment brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning judgement on the merits of the proposals.

1.6 The Planning Statement forms part of the information which has been submitted with this application, and is to be read in conjunction with the following documents:

- Application Covering Letter, prepared by Hunters;
- Planning Application Form, prepared by Montagu Evans;
- Location Plan, prepared by Hunters;
- Drawing Schedule, prepared by Montagu Evans;
- Application drawings, prepared by Hunters;
- Design and Access Statement, prepared by Hunters;
- Noise Impact Assessment, prepared by Bloc Consulting;
- Daylight and Sunlight Assessment, prepared by XCO2;
- Fire Statement, prepared by Hydrock;

- Energy Statement, prepared by Futureserv Ltd;
- Flood Risk Assessment and Drainage, prepared by Infrastruct CS Ltd;
- Air Quality Assessment, prepared by XCO2;
- Arboricultural Report (Including a Tree Survey Report), prepared by Trevor Heaps Arboricultural Consultancy;
- Transport Statement, prepared by i-Transport;
- Travel Plan, prepared by i-Transport;
- An Archaeological and Heritage Statement, prepared by the Environment Partnership;
- Contamination Land Assessment, prepared by CGL;
- Preliminary Ecological Appraisal, prepared by ECOSA;
- Affordable Housing Statement, prepared by Hunters; and
- CIL Additional Information Form, prepared by Hunters.

1.7 This Planning Statement demonstrates that the Proposed Scheme would:

- Optimise previously developed land (FLS) and underutilised land (ORS) in a sustainable town centre location;
- Deliver 95 affordable dwellings, equating to an overall provision of 100% affordable housing, all of which will be Social Rent. This will assist the Council in accommodating the needs of the Borough as well as positively contributing towards reducing the social housing register waiting list;
- Replace the existing library with a larger new library with greater accessibility and adhering to modern day requirements in terms of energy efficiency and fire safety;
- Deliver new housing to meet the Borough's identified needs, which will consist of a balanced mix of residential unit sizes, all of which would meet the minimum space standards and best practice space standards;
- Create private and communal amenity spaces for all future residents that meet and exceed minimum standards space requirements; and
- Provide on-site play space provision at the OR Site and provide improvements to existing playspace at the Yiewsley Recreation Ground;
- Enhance pedestrian connectivity to and from the OR Site and the wider area to the Recreation Ground;
- Provide significant tree and shrub planting across the Sites, including 7 new trees at the FL Site, 35 new trees at the OR Site and 30 new native trees within the Recreation Ground, to mitigate the removal of 9 existing trees at the FL Site;
- Showcase high quality and robust architectural design; and
- Deliver a 63.9% reduction in carbon emissions, well above the policy target of 35% target with a financial contribution to meet the shortfall to become carbon neutral.

## STAKEHOLDER ENGAGEMENT AND STATEMENT OF COMMUNITY INVOLVEMENT

### LOCALISM ACT

- 1.8 Pre-application consultation has long been seen as a positive process and a key part of ensuring local communities have a say in proposed developments. Many large planning applications are the subject of extensive pre-application consultation as a matter of course.
- 1.9 The Planning and Compulsory Purchase Act 2004 came into force at the end of September 2004. One of the central purposes of the Act was to improve community involvement in the planning process.
- 1.10 The accompanying guidance, and more recent publications, highlight the increased importance of pre-application discussions on development proposals and encourage applications to undertake public consultation, particularly on major developments.
- 1.11 The Localism Act (2011) requires that all consultation is recorded effectively with details of the measures that been taken to address feedback from consultees.

#### *National Context*

- 1.12 The National Policy Framework ("NPPF") 2021 emphasises the need to involve the local community and other key stakeholders within the planning process.
- 1.13 Paragraph 39 of the NPPF highlights that early engagement has "*significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and outcomes for the community*".
- 1.14 In March 2014 the Government published the National Planning Practice Guidance (NPPG) which replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The guidance covers consultation, more specifically relating to the Local Planning Authority's obligation to consult with local residents and other stakeholders.

#### *Consultation*

- 1.15 The Applicant held a public consultation on 6 October 2022 at Yiewsley Library between 3.30pm and 7.30pm where the public were given the opportunity to express their views on the proposals and make recommendations. Further information on how the schemes have evolved during the pre-application stage in response to stakeholder comments is provided in the DAS.

## 2.0 SITE LOCATION AND PLANNING HISTORY

### THE SITES

2.1 The Sites consists of two parcels of land sites to the east and north-west of Yiewsley Recreation Ground. For the purpose of this Statement they have been split up into the Falling Lane Site and the Otterfield Road Site for ease of reference.

### FALLING LANE SITE

2.2 The FL Site is bounded by Falling Lane Road (to the north) and the High Street (to the west) and is rectangular in shape, with an area of 2,421 sqm. To the east and south of the Site is Yiewsley Recreation Ground. It comprises a two-storey building which provides the Yiewsley Library (Use Class E(d)) at ground floor level and a fitness centre at first floor level.

2.3 The FL Site includes a public car park to the rear of the building (accessed from Falling Lane) providing 42 car parking spaces which are associated with the library and fitness centre and provides vehicular access to Yiewsley Recreation Ground. 16 of these spaces are 'park & stride' spaces for the Rabbsfarm School, which is situated approximately 227 metres (approximately 6-minute walk) to the north of the FL site.

### OTTERFIELD ROAD SITE

2.4 The OR Site is to the east of the Yiewsley Recreation Ground and is a 4,228 sqm triangular-shaped open plot. It is bounded by two storey residential properties with associated rear gardens at the eastern boundary and which front onto Otterfield Road.

2.5 Vehicular access to the OR Site is via Otterfield Road and Fairfield Road although pedestrian access can also be achieved via Yiewsley Recreation Ground.

2.6 According to the Council's planning history files, the OR Site was used as a swimming pool until it was decommissioned in 2010 and the buildings demolished in 2011, following the opening of new facilities in Uxbridge and Hayes.

2.7 The Site has been cleared and vacant ever since with boundary hoarding still implemented. There is some low quality, low-level shrubbery, grasses and small trees but the majority of the Site consists of hardstanding areas.

### SURROUNDING CONTEXT

2.8 The Sites are approximately 110 metres apart with the intervening Recreation Ground including a bowling green, skatepark, hardcourt games area and a children's play area

2.9 Both Sites are located in Yiewsley & West Drayton Town Centre and therefore the surrounding uses comprise a mix of typical town centre uses such as, general convenience, retail and restaurant uses as well as other town centre uses.

2.10 In terms of character, the surrounding streets of the Sites are primarily residential in character with storeys heights being typically two storeys. High Street and Fairfield Road are more mixed use in character and contain buildings with larger footprints typically between two and four storeys.

2.11 The Sites are not located within a conservation area. There are several locally listed buildings on the High Street to the west of the FL Site, including the George and Dragon Pub. There are no statutory listed buildings within close proximity of the Sites. Those nearest are the Grade II listed Yiewsley Grange and a Barn at Philpotts Yard, both of which are 282 metres away from the FL Site and 400 metres from the OR Site and are not materially affected by the Proposed Development.

2.12 The Sites have a Public Transport Accessibility Level (PTAL) rating of 3 (highest = 6 and lowest = 1). West Drayton Station is located approximately 0.5km south of the OR Site and 0.6km of the FL Site. West Drayton Station is in Zone 6 and serves West Drayton and Yiewsley and western suburbs of London. The station provides services to London Paddington, Ealing Broadway, West Ealing, and London Heathrow Airport. There are a number of bus stops located along the High Street and Falling Lane. There is a bus stop just outside the existing Yiewsley Library (Stop W) which travels to West Drayton, Hayes Town, Hounslow and Heathrow Central. Both Sites therefore benefit from very good access to public transport.

2.13 The Sites are located within Flood Zone 1, an area that benefits from a low probability of flooding.

2.14 There are 31 existing trees across the Sites. The submitted Arboricultural Report identifies the various tree category types. This is also provided at Table 2.1 (below).

CATEGORY TYPE	FL SITE	OR SITE
A1	1	
A2	3	1
B1	2	
B2	4	9
C2	8	1
U	1	1
Total	19	11

*Table 2.1 – Existing Tree Quantum and Category Rating. (Source: Trevor Heaps Arboricultural Impact Assessment)*

#### **Relevant Planning History**

2.15 With regards to the OR Site, full planning permission (Ref: 18344/APP/2013/3564) was granted on 18<sup>th</sup> March 2014 for the redevelopment of the site to provide a mixed-use development including one three-storey block comprising a health centre and a gym, a two-storey block comprising 12 supported housing/living flats and associated accommodation, car parking, landscaping and ancillary development.

2.16 We understand from the Council's online planning history files that the approved scheme was never implemented and this permission has now lapsed. Nevertheless, we consider that this planning permission is a relevant material consideration in determining this Application, so too is the fact that the OR Site was previously contained built form.

2.17 There are no historic planning applications of relevance at the FL Site that would be material to this Application

# 3.0 DEVELOPMENT PROPOSALS

3.1 As set out in **Section 1.0** of this Statement, this application seeks Full Planning Permission for the following formal description of development:

*“Demolition of existing Yiewsley Library Building and the erection of a new residential building on the Yiewsley Library site (Falling Lane) and the erection of a new mixed use building on the former Yiewsley Swimming Pool site (Otterfield Road), with a replacement library at ground floor level and residential uses above.*

3.2 A more detailed Description of Development for public consultation purposes is as follows:

*“Demolition of existing Yiewsley Library Building and the erection of a 4-storey residential building, comprising 50 dwellings, with 28 undercroft parking spaces (13 for residential and 15 for use by Rabbsfarm Primary School). The Otterfield Road site proposes the erection of a 5-storey building, comprising 45 dwellings, with 27 car parking spaces (25 for residential and 2 for library users).”*

3.3 The key elements of the Application are described below.

## DEMOLITION

3.4 It is proposed that the Yiewsley Library which exists on the FL Site will be demolished. This building comprises 276 sqm (GIA) floorspace.

3.5 As discussed previously, the former buildings on the Otterfield Road Site have already been demolished and the Site has been cleared. Therefore, no demolition works are proposed on this part of the Application Site.

## RE-PROVISION OF YIEWSLEY LIBRARY

3.6 The Proposed Development consists of re-providing Yiewsley Library at the OR Site. The new library will extend to 316 sqm floorspace, a larger footprint compared to what currently exists (276 sqm). The new library will meet modern day standards in terms of design, energy efficiency, accessibility and fire safety.

3.7 The new library will be located at ground floor level, as per existing and will provide an active frontage.

3.8 The proposed library will also include 75 sqm of new community space located in the south-west corner at ground floor level.

## RESIDENTIAL DEVELOPMENT

3.9 The proposals seek to deliver a 100% affordable housing scheme, delivering a total of 95 residential units expanding across two new buildings, one at the FL Site and the other at the OR Site. All residential units will be Social Rent.

3.10 At the FL Site, a part two, three, four storey building is proposed to provide 50 new homes.

3.11 With regards to the OR Site, the proposed scheme includes the delivery of a part five storey building with a maximum height of 17.7 metres (from floor to top of parapet) which will deliver 45 units.

3.12 This Applications proposes a total of 95 affordable homes, the proposed mix consists of the following:

MIX	FALLING LANE SITE	OTTERFIELD ROAD SITE
One Bedroom	18	23 (4 wheelchair accessible)
Two Bedroom	24 (3 wheelchair accessible)	11
Three Bedroom	8 (2 wheelchair accessible)	11 (2 wheelchair accessible)
Total	50 (100% social rent affordable housing)	45 (100% social rent affordable housing)

**Table 3.1: Proposed Unit Mix**

3.13 As set out in the table above, 11 of the total 95 residential units are wheelchair accessible. 2 of which are designed to be fully compliant with the optional requirement 2b of the Approved Document Part M to be wheelchair accessible, 3 units will meet the option requirements to be wheelchair adaptable and the remaining 6 are designed to meet the M4(2) requirements.

## AMENITY SPACE

### PRIVATE

3.14 All proposed apartments will have access to high quality private amenity spaces. This will be delivered in the form of gardens, patios and balconies. The duplex apartments have direct access from private front entrances which will be landscaped to a high quality and will also contribute as a private amenity space. In addition to this, private communal areas will be delivered for all residents. The proposed amenity spaces exceed all minimum requirements.

3.15 716.2 of private amenity space is proposed at the FL Site accommodating the 50 residential units, equating to an average of 14.32 sqm per unit.

3.16 In terms of the OR Site, 483.6 sqm of private amenity space is proposed for all of the 45 residential units, equating to an average of 10.75 sqm per unit.

### SHARED AMENITY SPACE

3.17 It is proposed to create communal gardens to deliver a total of 1,090 sqm shared amenity space across both Sites, 627.7 sqm will be delivered at the FL Site and 462.3 sqm at the OR Site. In total, this equates to an average of 13 sqm per unit at the FL Site and 10.3 sqm at the OR Site.

3.18 The proposed communal gardens will create social spaces within the development for lounging, socialising and visual, aesthetically pleasing amenity. They will consist of raised planters, new trees and flower planting, wild flora meadow areas, formal lawn areas and bat and bird boxes.

## LANDSCAPING AND PUBLIC REALM IMPROVEMENTS

3.19 High quality landscaping is also proposed which includes new planting and shrubs in attempt to soften the development boundaries between the Sites and the Recreation Ground which is designated Metropolitan Open Land (MoL).

3.20 This approach will ensure that the design across the Site is consistent and that the proposals sought within this Application seamlessly integrate into the local context. It is proposed that 10 trees will be removed to enable the delivery of the Proposed Development and the breakdown of these trees are as follows:

- Category A – 1
- Category B – 5
- Category C – 4

3.21 The trees that are proposed to be removed are identified as 'dead' and are therefore of low quality, therefore it is necessary for these to be removed. The proposals include the retention of 7 trees at the FL Site and 12 trees at the OR Site which will be protected by using up-to-date methodology and guidance during all stages of development. Further detail is provided within the Arboriculture Impact Assessment, prepared by Trevor Heaps Arboricultural Consultancy Ltd.

3.22 Notwithstanding this, the Proposed Scheme seeks to deliver a total of 42 new trees across the entire Site, 7 at the FL Site and 35 at the OR Site, therefore providing a net uplift and consequently, urban greening and biodiversity improvements.

3.23 With regard to off-site landscaping improvements, the Proposed Scheme seeks to deliver a new family landscaped garden which will create a new playspace area, consisting of a gazebo and a selection of timber equipment for children such as; log walks, balance beams, jungle walk, tram tracks and a scramble climber. In addition, the works also include the planting of 30 new native trees within the Recreation Ground. Access routes will also be improved and enhanced through landscaping, including new lighting that is appropriate within the surrounding context.

### **PLAY SPACE PROVISION**

3.1 On-site play space will be delivered at the northern corner of the OR Site, providing 158.83 sqm of play space floorspace. This new area will consist of activity trails, log walks, net bridges and a log climbing frame, catered towards ages 0-4 years and 5-10 years. This is presented on the Proposed Landscaping Plan, prepared by Hunters.

3.2 With regard to the FL Site, a communal terrace at the fourth floor is proposed, extending to a total of 256.4 sqm of floorspace which will include informal play for ages 0-4 years.

3.3 As set out above, off-site works include a new play space area within the Recreation Ground.

### **CAR PARKING**

3.4 A total of 28 car parking spaces will be delivered at the FL Site which will provided on-site and at ground floor level. For the residential element, 13 of these spaces will be allocated to the new residents, of which 5 will be wheelchair accessible. 15 car parking spaces will be provided for the Rabbsfarm School drop-off / pick-up activities (Park & Stride spaces) to retain the current use. These will be located near the vehicular access to the Falling Lane Site to prevent vehicles from parking further into the development and near to pedestrian routes to the school.

3.5 25 car parking spaces are proposed at the OR Site, of which 23 will be allocated to the new residents (including 5 wheelchair user spaces). The remaining 2 spaces will be wheelchair accessible for library visitors.

### **CYCLE PARKING**

3.6 The proposal seeks to provide a total of 178 cycle spaces across both Sites. There will be 90 secure cycle parking spaces located at ground floor level for new residents at the FL Site. These will be provided in the form of Sheffield stands located in two dedicated bicycle stores at ground floor level.

3.7 With regards to the OR Site, it is proposed that three dedicated bicycle stores will be delivered on this Site which is able to accommodate 88 bicycles. The spaces provided will be in the form of Sheffield stands. A further 10 short-space spaces will be delivered outdoors for the use of visitors of the new public library and community space.

## **SERVICING, DELIVERIES AND REFUSE**

- 3.8 In relation to refuse collection, there will be 2 communal bin storages provided for the residential block at the FL Site. Bin store 1 is located east of the main pedestrian entrance and bin store 2 is adjacent to the vehicular entrance on Falling Lane. The refuse stores are located within close proximity to Falling Lane Road and will be within the recommended distance of less 30 metres for collection by council operatives. The refuse storage spaces will operate as a communal storage system and is compliant with waste and refuse standards for all proposed residential units.
- 3.9 Residents will be required to take their refuse to the bin storage areas adjacent to the two stair cores on the Ground Floor. There is an entrance point in front of Bin Store 1 and Bin Store 2 that leads onto Falling Lane Road where the refuse collectors will be able to pick up refuse from the bin stores and take back to the collection point on Falling Lane Road. Food waste collection bins will also be provided.
- 3.10 In terms of the OR Site, refuse collection will take place from within the Site. A Swept Path Analysis has been undertaken by i-transport which has concluded that refuse vehicles are able to get within 10 metres of the bin store for collection and therefore can safely traverse in and around the Site.
- 3.11 Further details of this are set out in the Transport Statement, prepared by i-Transport.

# 4.0 PLANNING POLICY FRAMEWORK

4.1 This application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 5** provides an assessment of the Application against the policies and guidance contained within these documents.

## STATUTORY FRAMEWORK

4.2 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

## THE DEVELOPMENT PLAN

4.3 The Statutory Development Plan for the Site comprises the:

- The 2021 London Plan (the “London Plan”);
- Hillingdon Local Plan Part 1 –Strategic Policies (2012);
- Hillingdon Local Plan Part 2 – Development Management Policies (2020);
- Hillingdon Local Plan Part 2 – Site Allocations and Designations (2020); and
- Policies Map (2020).

## SITE SPECIFIC DESIGNATIONS

4.4 The Sites fall within Yiewsley and West Drayton Town Centre. They also falls within an Air Quality Management Area.

4.5 The Sites are identified as a Key Sub-Area within the Heathrow Opportunity Area.

4.6 Further details regarding both designations above are set out in the next section.

4.7 The Recreation Ground that sits between the Sites is designated as Metropolitan Open Land (MOL). For the avoidance of doubt, neither of the Sites fall within the MOL.

## MATERIAL CONSIDERATIONS - NATIONAL GUIDANCE

4.8 The revised National Planning Policy Framework (“the NPPF”) was published on 20 July 2021. The NPPF supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government’s approach to planning matters, and is a material consideration in the determination of planning applications

4.9 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a ‘golden thread’ running through decision-taking (paragraph 11), and goes onto state that:

*“For decision taking this means:*

- *approving development proposals that accord with an up-to-date development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

4.10 In March 2014, the Government published the Planning Practice Guidance (PPG) which is a material consideration in relation to planning applications. The PPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The PPG is a material consideration in the determination of applications and is regularly updated.

## **MATERIAL CONSIDERATIONS - EMERGING POLICY AND GUIDANCE**

### **NATIONAL PLANNING POLICY FRAMEWORK**

4.11 The Government undertook consultation on proposed changes to the NPPF (2021) which ran between 22<sup>nd</sup> December 2022 and 2<sup>nd</sup> March 2023.

4.12 The proposed changes set out within the consultation document primarily relate to the way in which the Government intend on assessing housing need, including the removal of the requirement to apply a buffer to Council's housing supply, they have proposed to reduce housing supply targets from 5 years to 4 years and have a strong focus towards "beauty" in new developments.

4.13 Given the document is still subject to consultation no weight has been attributed to the revisions as a material consideration.

### **LB HILLINGDON**

4.14 LB Hillingdon are in the early stages of reviewing their Local Plan. The Council adopted their Local Development Scheme (LDS) in July 2021 which provides the anticipated timeframes for the review of their Local Plan, leading up to adoption stage. The LDS identifies that the Council plan on consulting on the Regulation 18 version of the Local Plan in October – December 2021, however this has been stalled due to delays and it appears that the Council are still yet to publish this version of the Local Plan and start the consultation process.

4.15 The LDS also shows that the draft Local Plan was expected to be submitted to Examination in January – March 2023, with Examination in Public taking place in April – June 2023 and finally, adoption in October – December 2023. Due to delays this timeline has not been met and therefore we are of the view that the Council will most likely re-assess and publish a new strategy.

4.16 As part of the Council's evidence gathering processes, the Council commenced a Call for Sites exercise on 26<sup>th</sup> May 2023 which is expected to run up until 29<sup>th</sup> September 2023. This provides the opportunities for landowners and developers to submit a site as part of the exercise which will be assessed by the Council as part of their local plan review process.

## **MATERIAL CONSIDERATIONS – SUPPLEMENTARY PLANNING GUIDANCE AND DOCUMENTATION**

4.17 A number of supplementary planning guidance documents are material in respect of the Application. Those of particular relevance are:

- The Mayor's Affordable Housing Viability (SPG) (2017);
- The Mayor's Housing (SPG) (2016);
- The Mayor's Accessible London: Achieving an Inclusive Environment (SPG) (2014);
- The Mayor's Shaping Neighbourhoods: Character and Context (SPG) (2014);
- The Mayors Housing Design Standards (SPG) (June 2023);
- Sustainable Design and Construction (SPG) (2014);
- Shaping Neighbourhoods: Play and Informal Recreation (SPG) (2012); and
- Yiewsley Recreation Ground Management Plan (2015 – 2020).

# 5.0 PLANNING POLICY ASSESSMENT

5.1 This section of the statement assesses the development against the statutory development plan and other material considerations as outlined in **Section 4.0**.

## PRINCIPLE OF DEVELOPMENT

5.2 Directing new development to previously developed land is a core principle promoted in both national, regional and local planning policy. Chapter 11 of the NPPF encourages the effective use of land by reusing land that has been previously developed and Policy GG2 (Making the best use of land) of the London Plan calls on boroughs to enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites.

5.3 London Plan Policy SD6 (Town Centres and high streets) promotes the delivery of mixed use development schemes within Town Centre locations. The policy further highlights that housing will be supported in Town Centre locations, including a mix of accommodation with deliver a diverse range of housing, including smaller households, Build to Rent, senior living accommodation and student accommodation.

5.4 Furthermore, Policy SD7 (Town Centres: development principles and Development Plan Documents) of the London Plan requires all boroughs to adopt and support a Town Centre first approach, which seeks to ensure that development is focused in Town Centre locations.

5.5 The Site is located within Yiewsley & West Drayton Town Centre which is identified in the London Plan as a District Centre. Part E of London Plan Policy SD8 (Town Centre Network) states that District Centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment. Annex 1 of the London Plan sets out the Town Centre Network which identifies the Site, by virtue of its town centre designation, as having high residential growth potential.

5.6 Local Plan Part 2 Policy DMTC1 (Town Centre Development) sets out a Town Centre Hierarchy at Table 3.1 and identifies Yiewsley & West Drayton Town Centre as a *District Centre*, in accordance with the London Plan. This policy outlines that the Council support 'main town centre uses' where the development proposal is consistent with the scale and function of the centre and that appropriate servicing arrangements have been provided. This policy does state that residential use of ground floor premises in primary and secondary shopping areas and in designated parades will not be supported. In this instance, whilst there is ground floor residential accommodation proposed, this is not within the primary or secondary frontage or in a designated parade. Furthermore, the quality of accommodation is demonstrated to be of a high standard to justify ground floor accommodation.

5.7 In general terms, we consider that the principle of developing the Sites are acceptable. The FL Site is brownfield land and the OR Site is underutilised land serving no purpose that has a history of containing built-form. Both are situated in a town centre which is where national, regional and local planning policy direct development towards.

## FALLING LANE SITE

5.8 The FL Site currently comprises the existing Yiewsley Library and hardstanding area used as a car park which serves the library and Rabbsfarm School. Based on the presence of an existing building on the Site, we consider that it is Previously Developed Land, as identified within the NPPF. The NPPF makes clear that new development should be directed on land that has been previously developed and to also make effective use of such land. Furthermore, Policy SD7 (Town centres: development principles and development plan documents) of the London Plan calls on boroughs to consider intensifying sites such as those that contain surface car parks in accessible locations for higher density residential development.

5.9 Notwithstanding the above, we are aware that the car park that is used by Rabbsfarm School falls within the boundary of Yiewsley Recreation Ground. Furthermore, the wider car park is identified in the Yiewsley Recreation Ground Management Plan (2015-2020) as providing access to the Recreation Ground.

5.10 Whilst the Management Plan also refers to a 1926 covenant on the whole of the car park land requiring it to be maintained as '*open space for public use and recreation*', following a decision by the Council's Cabinet on 27 July 2023, the land in question is to be appropriated from public open space to planning purposes.

5.11 In light of the above, whilst the existing car park has no planning policy designations (other than it being located in the Town Centre), the Recreation Ground Management Plan refers to it as providing access to open space for public use and recreation, and which is a material consideration that requires further assessment.

5.12 The Local Plan does not specifically designate open space on the Proposals Map. However, Paragraph 8.41 of the Local Plan Part 1 provides a definition of public open space. It is defined as:

*'All open spaces of public value, including not just land, but also areas of water such as rivers and canals which offer important opportunities for sport and recreation and act as a visual amenity. The definition covers a broad range of types of open spaces within the borough, whether in public or private ownership, and whether public access is unrestricted, limited or restricted'.*

5.13 When considering this definition in the context of the FL Site, whilst the car park is not open space of public value nor of visual amenity, it provides access to open space of public value and visual amenity. An assessment therefore needs to be made of whether its loss would impact on the public use and recreation of the Recreation Ground.

5.14 In this regard, we note that the Recreation Ground is located in a sustainable location within walking distance to large residential population that live in the area, rail and bus services, the town centre and local schools. As such, it is expected that its catchment and user profile is typically limited to the local area with most users accessing it on foot. As such, the loss of car parking is not expected to affect the vast majority of people who use the Recreation Ground.

5.15 For the minority who are reliant on accessing the Recreation Ground by vehicle, there is another public car park (Fairfield Road Car Park) located approximately 100 metres to the south-east of the Recreation Ground and therefore also with walking distance. Furthermore, pedestrian accessibility between the Fairfield Road Car Park and the Recreation Ground will be enhanced by a new footpath connection that will be delivered as part of the proposed development. As such, we do not expect that the loss of the Falling Lane car park would adversely affect those users of the Recreation Ground who rely on access to it by the existing car park as there is alternative provision in the locality.

5.16 We therefore consider that any impact on the public use and recreation of the Recreation Ground as a result of the loss of the Falling Lane car park is mitigated by a combination of the FL Site's general accessibility to its users, and the close proximity of an alternative car park within walking distance which will be enhanced by a new pedestrian footpath connecting the two.

5.17 In addition to this, the proposed development provides opportunities to further strengthen the public use and recreation of the Recreation Ground by making direct improvements including;

- The addition of 30 new native trees;
- The delivery of a family landscaped garden for families, consisting of a gazebo and a selection of timber equipment for children such as log walks, balance beams, jungle walk, tram tracks and a scramble climber;
- Improvements to the pedestrian access routes, including new lighting / wayfinding measures;
- Replacing of palisade railings with hoop top railings;
- A new gate to access the OR Site where the new library will be located; and
- Upgrades to the existing south access ramp (Wilco / Fairfield Road car park).

5.18 The above will be secured in the S106 agreement.

5.19 In summary, the existing car park is not specifically designated or protected as public open space in the development plan. This is the starting point when assessing its loss and naturally limits any weight attached to it as public open space from a planning policy perspective.

5.20 It is acknowledged that the car park falls within the boundary of the Yiewsley Recreation Ground in the Management Plan which is a material consideration. Furthermore, the car park's purpose in facilitating access to the Recreation Ground (which is of public value) is acknowledged as a material consideration. However, the weight attached to this is limited by the fact that the loss of the car park would not materially impact on the public use and recreation of the Recreation Ground which is the overriding objective of the Management Plan.

5.21 Moreover, the Proposed Development actually provides an opportunity to improve the public use and recreation of the Recreation Ground overall as a result of the proposed enhancements. This is also a material consideration and one of weight which clearly outweighs any perceived harm attributed from the loss of the car park.

5.22 Ultimately, when assessed and weighed against other development plan policy and guidance, namely making best use of previously developed land in highly accessible locations (Chapter 11 of the NPPF and Policy GG2 of the London Plan) and recognising the capacity of low-density car parks for housing intensification (Policy SD7 of the London Plan) , we consider that the principle of the loss of the car park is justified and that the principle of development on the FL Site is wholly acceptable.

## OTTERFIELD ROAD SITE

5.23 The OR Site previously comprised the former Yiewsley Swimming Pool which was demolished in 2011. When considered in the context of key case law, including that *In The Trustees of Castell-y-Mynach Estate v Taff-Ely BC* [1985] which established the four criteria for assessing whether a use has been abandoned: 1) the physical condition of the buildings; 2) the period of non-use; 3) whether there has been any other use; 4) the owners intentions; we are of the view that it is likely that the use of the OR Site as a swimming pool/leisure centre has long been abandoned.

5.24 On the basis that OR Site is considered to be abandoned, it has no established planning use. As such, there is no requirement to assess the loss of the former swimming pool as part of this application.

5.25 Despite the OR Site having no established planning use class, the OR Site has contained built footprint historically and was the subject of planning permission in 2014 for a mixed use development of leisure uses and housing. Whilst it may be considered that the OR Site no longer strictly meets the definition of PDL in the NPPF, the fact that it has a relatively recent history of containing built form and retains the character of a PDL site in that it is permanently fenced off, and that the principle of development on the Site has been accepted previously, we consider that the principle of development continues to be acceptable. Alongside this, the Site is located in the designated Town Centre where development is directed towards and would make best use of an underutilised and abandoned site.

5.26 In summary of the above, we consider that the OR Site's Town Centre designation is the starting point when considering the acceptability of the principle of development. This is where development is directed towards in the Local Plan. Furthermore, we consider that both the historic use of the Site and the 2014 permission further help support the principle of the development of a site that still retains the character of a PDL site and has currently sits underutilised and abandoned.

5.27 As with the FL Site, the OR Site was subject to a 1926 Conveyance and a 1934 Conveyance that held the Site for the purposes of public walks and pleasure grounds. Equally, the decision was made by the Council's Cabinet on 27 July 2023, to appropriate the land in question from public use to planning purposes.

## PRINCIPLE OF LIBRARY

5.28 London Plan Policy SD6 (Town Centres and High Streets) seeks to promote the enhance the vitality and viability of London's town centre network by encouraging a range of uses within town centres including (alongside main town centre uses) civic, community, social and residential uses.

5.29 Policy DMCI 1 in Part 2 of the Local Plan (Retention of Existing Community Facilities) outlines that proposals involving the loss of an existing community facility will be permitted where it would not lead to a shortfall in provision for the specific use within the local catchment area. Further, proposals would be permitted where any replacement/relocated facilities for the specific use provides a level of accessibility and standard of provision at least equal to that of the existing facility.

5.30 Policy DMTC 2 of Part 2 of the Local Plans supports proposals that involve new community facilities where they are located within the community or catchment that they are intended to serve and provide buildings that are inclusive, accessible, flexible and which provide design and space standards that meet the needs of intended occupants.

5.31 Strategic Local Plan Policy CI1 (Community Infrastructure Provision) sets out that community and social infrastructure which caters for the needs of the existing community and future populations should be encouraged, which includes supporting the retention and enhancements of existing community facilities whilst resisting their loss. Where the loss of community facilities is justified, the Council will seek to ensure that the resulting development compensates these uses to ensure there is no net loss. In some instances, developments may need to contribute towards the provision of community facilities.

5.32 As set out in the previous Section, the existing Yiewsley Library is located at the Falling Lane Site. It contains 276 sqm floorspace which is to be demolished as part of the Proposed Development. The proposals consist of re-providing a library with a larger floorspace of 316 sqm floorspace at the OR Site and therefore does not result in a reduction or shortfall in the amount of community floorspace, in accordance with London Plan Policies SD6 and SD7 and Local Plan Policy CI1. In addition, the new library continues to remain within the same local catchment area and thereby the new location should be considered acceptable.

5.33 The existing library is unable to operate efficiently from a sustainability perspective as it fails to meet modern day standards in terms of energy efficiency, accessibility and fire safety, primarily due to the era in which it was constructed. As a result, a new library allows for the use of high quality materials and better design which ultimately will result in a more sustainable building that meets modern day standards, in line with Local Plan Policy DMTC 2.

5.34 In addition, whilst the Site fall within the district centre boundary, neither parcels of land are designated as part of the primary or secondary shopping areas, and as such, the loss of the non-residential frontage onto the High Street (as a result of the loss of the library) would have a no material impact on the continued vitality of the town centre.

## PRINCIPLE OF RESIDENTIAL DEVELOPMENT

5.35 Proposals consisting of the provision of residential accommodation on previously developed sites accord with planning policy at all levels.

5.36 Paragraph 68 of the NPPF requires local planning authorities to ensure planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements, and developable sites or broad locations for growth for 6-15 years. An appropriate buffer should be included to ensure choice and competition in the market (paragraph 73).

5.37 The redevelopment of the Site and the introduction of a residential element is consistent with national and regional policy guidance, with the NPPF stating "*housing applications should be considered in the context of the presumption in favour of sustainable development*". Paragraph 60 of the Framework requires local authorities to "*support the Government's objective of significantly boosting the supply of home*".

5.38 Paragraph 11 of the NPPF explains that development should, as a minimum, provide for objectively assessed needs for housing and other uses, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

5.39 London Plan SD6 states that the potential for new housing within and on the edge of town centres should be realised through mixed-use of purely residential developments where these make the best use of land, capitalising on the availability of services within walking and cycle distance, whilst the provision of social infrastructure should be enhanced.

The supporting text to this policy confirms that residential development can play an important role in ensuring town centre vitality, and residential-only schemes in town centres may be appropriate outside the primary shopping area, and primary and secondary shopping frontages, where it can be demonstrated that they would not undermine local character or the diverse range of uses required to make a town centre vibrant and viable.

- 5.40 London Plan SD7 (Town Centres) further highlights that some sites within town centres may be suitable for higher density mixed-use or residential intensification, such as through the comprehensive redevelopment of surface car-parks, surplus shopping frontages or other low-density town centre buildings that are not of heritage, value, whilst re-providing any non-residential uses that would be lost as part of the redevelopment.
- 5.41 Table 4.1 of the London Plan identifies a ten-year housing target (2019/20 – 2028/29) of 10,830 new homes in Hillingdon, equating to 1,083 new homes per annum.
- 5.42 Core Policy 6 (New Homes) and Policy H1 (Housing Growth) in the Part 1 Plan sets out that the Council seek a target of 425 new homes per annum, as per the figure identified in the old London Plan. As stated above, the Mayor has identified a greater need for housing in the Borough and has increased the Council's housing targets.
- 5.43 Table 5.3 of Part 1 of the Local Plan identifies that the Yiewsley and West Drayton Town Centre is a Key Sub-Area of the Heathrow Opportunity Area and sets out the Council's vision for future growth. It identifies that the planned Crossrail station at West Drayton will create further regeneration opportunities, including additional housing, office and retail capacity and is a suitable location for mixed-use development.
- 5.44 In the light of the above, we consider that the introduction of residential uses on the Site is considered appropriate given its town centre and accessible location, as set out by London Plan Policy SD7 and the Council's objectives for the Yiewsley and West Drayton Town Centre is a Key Sub-Area. In addition, at a national level the introduction of additional residential units is in line with the objectives of the NPPF, which encourages the effective use of land, particularly previously developed land. The proposal will also deliver housing within an Opportunity Area (Heathrow Gateway Opportunity Area) which is a strategic priority for the Council and the GLA in terms of where residential redevelopment is directed.

## **OPTIMISING DEVELOPMENT**

- 5.45 The NPPF seeks to ensure that development proposals optimise the potential sites to accommodate development as well as create and sustain an appropriate mix of uses. Paragraph 124 of the NPPF states that planning policies and decisions should support development that makes efficient use of land as well as create and sustain an appropriate mix of uses. Plans should contain policies to optimise the use of land and meet as much of the identified need for housing as possible.
- 5.46 Paragraph 125 of the NPPF sets out that '*where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each Site*'.
- 5.47 London Plan Policy D3 (Optimising Site Capacity through the Design-led Approach) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. This policy further states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport.

5.48 London Plan Policy D2 (Infrastructure Requirements for Sustainable Densities) states that the density of development proposals should:

- (1) *“consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels,*
- (2) *Be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)”.*

5.49 The Mayor of London Housing SPG (2016) provides further guidance on the density of new residential development. The SPG identifies that when coming to a view on the appropriate density for a development, that proper weight should be given to the range of relevant qualitative concerns. It also advises that density decisions on new schemes should take account of differing housing needs of the households who will live in the completed scheme and that lower density developments lend themselves more, though not exclusively, to family housing.

5.50 Policy DMHB 17 (Residential Density) outlines that all new residential development should take into account the *Residential Density Matrix* at Table 5.3 in Part 2 of the Local Plan. The Council state that developments will be expected to meet habitable rooms standards and outline the following densities for urban locations:

- Average 3.5 hr/unit: 175 – 385 hr/ha and 50 – 110 u/ha
- Average 3.3 hr/unit: 170 – 660 hr/ha and 55 – 200 u/ha
- Average 3 hr/unit – 450 – 750 hr/ha and 150 – 250 u/ha

5.51 Based on the Matrix above, the proposed density at the FL Site is 578.3 hr/ha and 206.5 u/ha and at the OR Site it is 291 hr/ha and 106.4 u/ha. In relation to habitable rooms, 140 are provided at the FL Site and 123 at the OR Site. The scheme has been carefully designed to reflect both the Site’s context and the national, regional and local drive to optimise the development potential of brownfield sites and underutilised site within sustainable locations. As set out within this Statement, the Sites are located within an accessible location, benefiting from strong transport links, and as such is considered a suitable place for dense development. The Sites are further located within a town centre location which has been identified with the London Plan to make the best use of land to accommodate high quality, dense schemes. The delivery of a high quality, dense scheme is therefore consistent with the surrounding local context and the Site’s Yiewsley and West Drayton Town Centre designation.

5.52 We consider that the proposed density of both part of the Site are supported and encouraged within town centre location and it will allow for a greater number of residential units to be delivered, therefore contributing to LBH’s housing targets but also responds to the nation-wide need for housing delivery.

## **AFFORDABLE HOUSING**

5.53 Paragraph 62 of the NPPF requires housing to be delivered for all different groups in the community, including those who require affordable housing.

5.54 The NPPF advocates the need for Local Planning Authorities to be flexible in the application of planning policies to ensure that schemes are not at risk of being delayed or abandoned. Paragraph 63 of the NPPF requires Planning Policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site

provision or an appropriate financial contribution in lieu can be robustly justified and it can be agreed that this approach contributes to the objective of creative mixed and balanced communities.

5.55 London Plan Policy H4 (Delivering affordable housing) identifies a strategic target of 50% of all new affordable homes delivered across London to be genuinely affordable. This will be achieved through requirement major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach.

5.56 London Plan Policy H5 (Threshold approach to applications) states that the threshold level of affordable housing on gross residential development is initially set at:

- *a minimum of 35 per cent; or*
- *50 per cent for public sector land where there is no portfolio agreement with the Mayor; or*
- *50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, colocation and substitution where the scheme would result in a net loss of industrial capacity.*

5.57 In this instance, the policy target would be 50% as the Site would be considered to be public sector land.

5.58 Policy H6 (Affordable Housing Tenure) in the London Plan requires the following:

- 1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
- 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- 3) the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need

5.59 DMH 7 (Provision of Affordable Housing) in Part 2 of the Local Plan requires new developments of 10 or more units to maximise the delivery of on-site affordable housing and that a minimum of 35% is delivered on site, with a tenure of 70% social/affordable rent and 30% intermediate.

5.60 All of the residential units proposed as part of this Application are to be affordable homes and will all be Social Rent tenure (95 units). The provision of a 100% affordable housing scheme will contribute towards the London-wide shortage of delivering affordable homes. This will also assist the Council with meeting their affordable housing targets and ensuring the Borough are able to accommodate those in need. As such, the provision of affordable housing is 100% and therefore exceeds the 50% strategic target set by the Mayor and the 35% target set by the Council.

5.61 The level of affordable housing in percentage terms ensures that the application benefits from the Fast-Track Route. Indeed, whilst the level of affordable housing proposed does not deliver any Intermediate housing, Part B of Policy H6 accepts that the Fast Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold is reached.

5.62 An Affordable Housing Statement prepared by Hunters accompanies this submission which provides further detail.

## HOUSING MIX

5.63 London Plan Policy H10 (Housing Size Mix) requires new development to consist of a range of unit sizes, and to deliver mixed and inclusive neighbourhoods. This policy further states that to determine the appropriate mix of unit sizes in relation to the number of bedroom for a scheme, it should have regard to the following:

- 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment;
- 2) the requirement to deliver mixed and inclusive neighbourhoods;
- 3) the need to deliver a range of unit types at different price points across London;
- 4) the mix of uses in the scheme;
- 5) the range of tenures in the scheme;
- 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity;
- 7) the aim to optimise housing potential on sites;
- 8) the ability of new development to reduce pressure on conversion, subdivision and amalgamation of existing stock; and
- 9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

5.64 Development Management Policy DMH 2 (Housing Mix) requires a mix of housing units to reflect the Council's latest information on housing needs. The Council's latest evidence of housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.

5.65 The proposed unit mix comprises of the following for each Site:

	FALLING LANE SITE	OTTERFIELD ROAD SITE	ENTIRE APPLICATION SITE
1 bed	18	23	41 (43%)
2 bed	24	11	35 (37%)
3 bed	8	11	19 (20%)

**Table 5.1: Proposed Housing Unit Mix**

5.66 In light of the above, it is considered that the proposed mix is acceptable. There is a mix of units provided to promote the creation of mixed and balanced communities. Whilst it is acknowledged that the proposed mix provides a shortfall of family units when compared to the Council's latest housing need assessment (Policy DMH 2), the Sites fall within a Town Centre location whereby it is typically more appropriate to deliver flatted development which mainly consist of 1 and 2 bedroom units.

5.67 Notwithstanding this, we consider the Site is still an appropriate location to deliver family housing due to its accessible location and proximity of the public park. As such, it is proposed that 20% of the units are three bedroom.

5.68 As a result, a broad mix is proposed to help foster a mixed and balanced community. This is considered to be a wholly appropriate response to the context of the Sites.

## HOUSING QUALITY

5.69 Paragraph 126 of the NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.

5.70 London Plan D6 (Housing Quality and Standards) outlines that all housing development should be of high quality design and provide adequately-sized rooms, meeting and exceeding the minimal internal space standards for new dwellings set out at Table 3.1 in the London Plan.

5.71 The minimum standards included in Table 3.1 of the London Plan are set out below. These standards are required to be applied to all tenures and all residential accommodation that is self-contained. The figures shown in blue within the table are the best practice space standards set out in standard C2.2 which provides additional space, over and above the minimum space standard, to ensure new homes are fit for purpose and of the highest residential quality. They specifically require more storage and better provision for home working. This is provided within the Mayor of London's Housing Design Standards SPG document.

5.72 At a local level, the Council make reference to Table 3.1 in the London Plan and require all new developments to be in compliance with the minimum standards that are set out within it.

		MINIMUM GROSS INTERNAL FLOOR AREAS AND STORAGE (SQUARE METERS)			
NUMBER OF BEDROOMS	NUMBER OF BED SPACES	1 STOREY DWELLINGS	2 STORAGE DWELLINGS	3 STOREY DWELLINGS	BUILT-IN STORAGE
1b	1p	39 (37) (43/41)			1 (1.5)
	2p	50 (55)	58 (63)		1.5 (2.0)
2b	3p	61 (67)	70 (76)		2 (2.5)
	4p	70 (77)	79 (86)		
3b	4p	74 (84)	84 (94)	90 (100)	2.5 (3.0)
	5p	86 (97)	93 (104)	99 (110)	
	6p	95 (107)	102 (114)	108 (120)	
4b	5p	90 (101)	97 (108)	103 (114)	3 (3.5)
	6p	99 (111)	106 (118)	112 (124)	
	7p	108 (121)	115 (128)	121 (134)	
	8p	117 (131)	124 (138)	130 (144)	
5b	6p	103 (115)	110 (122)	116 (128)	3.5 (4.0)
	7p	112 (125)	119 (132)	125 (138)	

	8p	121 (135)	128 (142)	134 (148)	
6b	7p	116 (129)	123 (136)	129 (142)	4 (4.5)
	8p	125 (139)	132 (146)	138 (152)	

**Table 5.2: Table 3.1 of the London Plan – Minimum Space Standards for new dwellings – best practice standards outlined in blue from draft Housing and Design Standards LPG (2023)**

5.73 All of the proposed units would meet or exceeds the minimum space standards set out above, including the majority of the best practice space standards, and are therefore acceptable.

#### DUAL ASPECT

5.74 Further to the above, London Plan D6 (Housing Quality and Standards) requires all housing developments should maximise the provision of dual aspect dwellings and avoid single aspect dwellings where possible. A single aspect dwelling should only be provided where it is considered a more appropriate design solution as a result of site constraints which would mean dual aspect dwellings would severely restrict optimising the site's potential. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

5.75 Within the FL Site, there will be 24 single-aspect units; 17 double aspect units and 9 triple-aspect units. At the OR Site, there will be 18 single aspect units, 15 double aspect units and 12 triple aspect units. Where possible, efforts have been made to maximise the number of double and triple aspect units and in total 55% of units are dual aspect. The larger proportion of single aspect units has been influenced by the large amount of private and shared amenity space that is proposed, including balconies and terraces for all residential units. It is important to note that there are no single-aspect north-facing units proposed as part of the Scheme.

#### ACCESSIBILITY

5.76 Policy D5 (Inclusive Design) of the London Plan sets out that development proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion and to be convenient and welcoming with no disabling barriers. Development should also be able to be entered, used and exited safely, easily and with dignity for all.

5.77 London Plan Policy D7 (Accessible Housing) states that at least 10 per cent of dwellings should meet Building Regulation required M4(3) 'wheelchair user dwellings' and all other dwellings should meet M4(2) 'accessible and adaptable dwellings'.

5.78 Policy DMHB 16 (Housing Standards) in Part 2 of the Local Plan requires at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

5.79 In line with the requirements of the London Plan and Policy DMHB 16, the scheme will provide eleven wheelchair apartments which have been designed to be compliant with Part M4(3) wheelchair accessible units. The remainder of the units will be M4(2). Further details are outlined within the Design and Access Statement, prepared by Hunters.

## PRIVATE AND COMMUNAL AMENITY

5.80 The Mayor's Housing SPG (November 2012) sets out a requirement for a minimum of 5sqm of private outdoor space that should be provided for 1-2 person dwellings and an additional 1sqm for each additional occupant (Standard 4.10.1). This guidance is retained under Policy D6 (Housing Quality and Standards) of the London Plan.

5.81 Policy DMHB 18 (Private Outdoor Amenity Space) requires all new residential development to provide good quality and useable private outdoor amenity space. The minim standards for private outdoor amenity space are includes in Table 5.3, this is set out below.

DWELLING TYPE	NO OF BEDROOMS	MINIMUM AMENITY SPACE PROVISION (SQM)
Houses	1 bedroom	40
	2 and 3 bedrooms	60
	4 + bedrooms	100
Flats	Studio and 1 bedroom	20
	2 bedrooms	25
	3 + bedrooms	30

**Table 5.3: Private Outdoor Amenity Space Standards**

5.82 Based on a proposal for 41 one bedroom units, 35 two bedroom units and 19 three bedroom units, the Proposed Development would require 2,265 sqm of private amenity space, in line with local policies.

5.83 At the FL Site, a total of 1,363 sqm of amenity space will be delivered, of which 659 sqm will be private amenity space and provided for each individual unit and 704 sqm will be used as shared / communal areas for all new residents.

5.84 At the OR Site, 983 sqm of amenity space will be delivered. 484 sqm of amenity space will be provided and similarly to the FL Site, this will be delivered in the form of balconies and terraces per residential unit. The shared / communal amenity areas extend to a total of 499 sqm and will be provided as communal terraces and gardens at ground floor level.

5.85 In summary of the above, the proposed amenity space provision of 2,346 sqm exceeds the minimum requirement of 2,265 sqm, as per the calculated against the Council's space standards in Table 5.3. As a result, the amount of proposed external amenity areas are considered acceptable and it is considered that these would provide future occupiers with a good level of amenity.

## PLAY SPACE

5.86 Policy S4 (Play and Informal Recreation) of the London Plan states that development proposals for schemes that are likely to be used by children and young adults should increase opportunities for play and informal recreation and enable children and young people to be independently mobile.

5.87 The Policy further states that for residential development proposals should incorporate good-quality accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that provides a stimulating environment, is accessible to all safely from the street and forms an integral part of the surrounding neighbourhood. These spaces should also incorporate trees, be overlooked to enable passive surveillance and not be segregated by tenure.

5.88 Policy DMCI 5 (Children's Play Areas) in Part 2 of the Local Plan requires all major development proposals to provide at least 10 sqm of play space for each child, based on the GLA's child yield calculator, and playgrounds must be within 400m of a development in line with the accessibility standard. There is an identified need of new play equipment in Yiewsley and West Drayton, as explained under this policy.

5.89 Policy DMCI 19 (Play Space) in Part 2 of the Local Plan sets out further that major development proposals should seek to provide children's play facilities on-site, and where this is not possible, the council will seek a financial contribution towards the improvement of existing children's facilities in the local area.

5.90 Having applied the GLA's child yield calculator, the Proposed Development is likely to house 74.4 children (aged 0-17), which equates to a play space provision requirement of 744 sqm (10 sqm per child).

5.91 Further, it calculates that this would include 32.4 children aged 0-4 years, 24.8 children aged 5-11 years, 11.3 children aged 12-15 years, 6 children aged 16-17 years.

5.92 With regard to the FL Site, a communal terrace at the fourth floor is proposed, extending to a total of 256.4 sqm of floorspace providing opportunities for informal play and recreation for 0-4 year olds.. With regard to the OR Site, 158.83 sqm of playspace is proposed for ages 0-4 years and 5-10 years. The new equipment will consist of activity trails, log walks, a net bridge and a log climbing frame.

5.93 As a result, the total playspace provision equates to 415.23 sqm for the entire Site and provides sufficient play space to accommodate the child yield for children aged 0-4 years as well as partially meets the needs of the 5-11 year olds. The remainder of the play space will be provided off-site through a new landscaped family area within the Recreation Ground. This will comprise of new play equipment for children and landscapes areas, comprising of new seating and outdoor furniture and features for families to enjoy. Not only will this meet the shortfall from the Proposed Development, it will meet the needs of the wider community.

#### *Daylight and Sunlight*

5.94 With regards to daylight and sunlight matters, London Plan Policy D6 outlines that the design of development should provide sufficient daylight and sunlight to new and surrounding housing for its context.

5.95 London Plan Policy D6 (Housing Quality and Standards) requires all new residential properties to meet the minimum space standards and further states that minimum to ceiling height must be 2.5m for at least 75% of the GIA of each dwelling to avoid overheating and generally improve living conditions. In addition, the design of new residential development should be of high quality and should provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating tenures.

5.96 Further, proposed developments are also required to maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings under this policy.

5.97 An assessment of internal daylight condition has been undertaken to establish the likely access to natural light within each units. The method and findings of this assessment are included within the accompanying Daylight and Sunlight Report, prepared by XCO2. The assessment was carried out for all 142 habitable rooms at the Falling Lane Site and all 123 habitable rooms at the Otterfield Road Site. The findings show that all dwellings and habitable spaces is anticipated to achieve good levels of daylighting with 80% of habitable rooms meeting BRE Recommendations. It is therefore concluded that the Proposed Scheme will provide good quality of accommodation to the future occupants in terms of daylight.

5.98 With regard to sunlight, an assessment was undertaken on all proposed 95 residential units. The analysis identified that approximately 70% of the dwellings at the Falling Lane Site will meet BRE Recommendations with 33 of the 50 units meeting the recommended targets as the remaining 17 units are north facing units. At the Otterfield Road Site, it was found that approximately 96% of the units will meet the BRE Recommendations with 43 of the 45 units meeting the recommended targets, and the remaining 2 units are north facing units. Overall, it is concluded that 79% of proposed units across both Sites will meet the BRE Recommendations and the proposed design offers optimum accessibility to sunlight. All of the remaining 21% of the dwellings are north facing units which would not have access to direct sunlight.

#### *Overshadowing*

5.99 London Plan Policy D6 (Housing Quality and Standards) states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

5.100 An Overshadowing Assessment has been undertaken and the conclusions are discussed within the accompanying Daylight and Sunlight Report. The assessment found that all amenity spaces will receive 2 hours of sunlight over 50% of their area, in accordance with the BRE guideline recommendations. As such, this should provide certainty that new residents will now experience any overshadowing issues.

### **NEIGHBOURING AMENITY**

#### **OVERLOOKING AND PRIVACY**

5.101 Policy DMHD 1 (Alterations and Extensions to Residential Dwellings) in Part 2 of the Local Plan identifies at part vi) that overlooking of other houses should not be less than 21 metres distance.

5.102 As discussed above, the Proposed Scheme would cause a limited impact upon visual amenity in the area and would influence the appearance of the skyline at a local level. However, both proposed buildings have a significant separation distance of 40 metres which in turn, will not significantly affect the outlook or privacy of nearby residential properties and would not lead to a sense of enclosure because of the proposed separation distances between the facing walls.

5.103 . As a result, the Proposed Scheme would not lead to a loss of privacy and therefore is considered to comply with the objectives of Policies DMHB 11, DMHD 1 and BE1 of the Hillingdon Local Plan and the Mayor's Housing SPG.

#### **DAYLIGHT AND SUNLIGHT – NEIGHBOURING PROPERTIES**

5.104 In terms of assessing the amenity of neighbouring properties, an assessment has been undertaken from Hunters at both Sites to identify any risk of impacting the existing houses which are closest to the Application Site. This assessment has been conducted using guidance document BR209 'Site Layout planning for Daylight and Sunlight' 2011, and with specific reference to Page 7 Section 2.2.5 and Page 8, Figure 14 (below), which describe the key '25° test' which is a standard method of assessing daylight impact on neighbouring buildings.

5.105 The tests conducted on both Sites identified that there is no point at which any of the Proposed Development subtends an angle greater than '25°. On this basis, the Proposed Development passed the BR209 test and does not require further assessment for daylight impact on neighbours.

5.106 As a result of the above, the existing resident's amenity will continue to be protected and therefore the Proposed Scheme is wholly compliant with all levels of policy and guidance.

5.107 Further detail is provided within the Daylight and Sunlight Assessments and the Daylight Impact Site Section drawings, prepared by Hunters.

## DESIGN AND MASSING

5.108 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development and plays a crucial role in promoting better places for people. Paragraph 130 of the NPPF states that planning policies and decision should ensure that developments:

- a) *"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

5.109 Chapter 3 of the London Plan reinforces the Mayor's commitment to ensuring the delivery of good quality designed developments, which reflect and respond to London's character. Policy D1 (London's form, Character and Capacity for growth) requires developments to respond to local context by delivering buildings and spaces that are positioned and are of a scale, appearance and shape that responds successfully to the identity and character of the locality. Furthermore, Policy D5 (Inclusive Design) requires developments to deliver inclusive environments that meet the needs of all Londoners.

5.110 London Plan Policy D11 (Safety, Security and Resilience to Emergency) sets out that Boroughs should work with the Metropolitan Police Service's 'Design Out Crime' Officers to identify the community safety needs and necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. This policy states that proposals should seek to maximise building resilience and minimise potential physical risks, and should include measures to design out crime that deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.

5.111 Policy BE1 (Built Environment) requires all new development to improve and maintain the quality of the built environment through achieving a high quality of design in all new building and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place. This policy states further that new development should improve areas of poorer environmental quality, including the areas of relative disadvantage of Hayes, Yiewsley and West Drayton.

5.112 The Proposed Development consists of a high quality development which includes the provision of a better quality library to meets modern day standards and the provision of 95 residential units across two Blocks. The materiality of the Proposed

Development has further been developed to ensure both a high quality development is delivered but also one that responds positively to surrounding local character. The proposed materiality of the blocks at the Sites ensures consistency throughout the design of the buildings whilst ensuring that each building have their own identity.

- 5.113 A high quality design approach has played an integral part in the evolution of the design which is demonstrated within the Scheme. The Design and Access Statement, prepared by Hunters, which accompanies this submission provides further details on the design evolution of how the Scheme has evolved to ensure it interacts with and responds to its surrounding context whilst making most efficient use of the Site. It also provides an overall justification of the design and provides comprehensive detailing regarding the proposed design.
- 5.114 With regards to the FL Site, residential use will be provided at ground floor level which will ensure that a level of human activity remains within a town centre location. At the OR Site, the orientation of the proposed block with the re-provision of a community facility at ground floor level seeks to ensure that activation is created at ground floor and a welcoming legible environment is created within the Town Centre. In turn, more pedestrian activity ensures a safer and secure environment which naturally contributes to the Design Out Crime objectives, as stated in the London Plan.
- 5.115 Adopting a high quality design approach has played an integral part in the evolution of the Proposed Development. The proposed scale and materiality of the buildings across both Sites has been demonstrated to be acceptable and ensures that a high quality development will be delivered. A strong driver in the design of the proposal was the optimisation of the connectivity throughout the site, this is reflected in the orientation of the buildings and the proposed layouts, in conjunction with a creating a comprehensive landscaping strategy to create a coherent, logical and high quality scheme, in line with the requirements London Plan Policy D1 and Local Plan Policy BE1. This also mirrors the guidance set out within the NPPF at paragraph 130.
- 5.116 Further, the Proposed Development consist of high quality architecture with inherent robustness to deliver desired and aesthetically pleasing buildings which will last for a long sustained period of time, through the use of brickwork with minimal lightweight cladding materials.
- 5.117 With regard to massing, the proposed buildings have been carefully designed to respond to the surrounding context and to avoid an overbearing feel. The layout of the buildings have been positioned carefully with having regard for the MoL that sits at the boundary line of both Sites.
- 5.118 In summary of the above, the proposed design of both developments are wholly compliant with policy and guidance at all levels and therefore should be considered acceptable.

## **TALL BUILDINGS**

- 5.119 London Plan Policy D9 (Tall Buildings) states that development plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 5.120 The Proposed Development seeks to deliver a four storey building (13.2m measured from ground to the floor level of the uppermost storey) at the FL Site and a five storey building (13.65 metres measured from ground to the floor level of the uppermost storey) at the OR Site. As such, the Proposed Development would not be considered “tall buildings” in the context of the London Plan and therefore do not require an individual assessment against the policy.

5.121 Even though no Tall Buildings are proposed, assessments have been undertaken which accompany this Application which ensures that the proposed height is appropriate, responds to its local context and does not give rise to any neighbouring amenity issues.

## HERITAGE AND ARCHAEOLOGY

5.122 The Site is not located within a conservation area, nor does the Site contain any statutory or locally listed building. Notwithstanding this, there are several locally listed buildings on the High Street to the west of the Application Site, the closely being the George and Dragon Pub.

5.123 An Archaeological and Heritage Assessment has been submitted for both Sites prepared by the Environment Partnership and confirms the magnitude of effect upon the character of the area, the locally listed buildings and any unknown archaeological remains would be low at both the FL Site and OR Site.

## TRANSPORT

5.124 Section 9 of the NPPF sets out the Government's policies with regard to transport. Paragraph 108 sets out that development should be ensured that:

- a) *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

5.125 Chapter 10 of the London Plan provides the regional guidance for transport. London Plan Policy T1 (Strategic approach to transport) states that all developments should make the most effective use of land, reflecting its connectivity by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

5.126 London Plan Policy T2 (Healthy Streets) states that proposals should reduce the dominance of vehicles on London's streets, whilst being permeable by foot and cycle and connectable to local walking and cycling networks as well as public transport.

5.127 The Sites are located within an urban part of London and is within a Town Centre, therefore, having access to a number of key services, which are within walking distance of the Sites with good pedestrian and cycle routes to and from the Sites. The Sites have good public transport accessibility (PTAL 3), which ensures very strong links to National Rail, TfL Rail and bus services.

5.128 This submission is accompanied by a Transport Statement produced by i-transport for each Site. Each Statement for both Site's conclude that the Proposed Developments are wholly compliant with the relevant national regional and local policies and is considered acceptable in transport terms.

*Falling Lane Site*

5.129 As discussed previously, the proposals consist of building upon the existing car park and so the existing vehicle access will be closed as a result. The proposals include providing a new vehicle access from Falling Lane Road which will serve a total of 28 car parking spaces at street level for the new residents. In terms of pedestrian access, the primary access point will be obtained from Yiewsley High Street, at the northwest of the Site. A further pedestrian access will be provided on Falling Lane Road to the west of the vehicular access. Proposals include improvements and new lighting to the existing pedestrian access route from Falling Lane Road to the north, throughout the Recreation Ground, connecting to the OR Site, at the western boundary. These access and egress routes are demonstrated on the architectural drawings, provided by Hunters.

5.130 In relation to trip generation, the Proposed Development will result in a reduction of 52 trips in the morning period and 16 trips in the evening peak hours. Thus, a reduction of vehicle trip generation to/from the Site when compared to the existing use has been concluded. As a result, the volume of car traffic is considered insignificant and is not anticipated to present a risk to road safety or be detrimental to the free flow of traffic as a result of the Proposed Development. Further detail is provided within the Transport Assessment.

5.131 Car Club services operated by HiyaCar are also located throughout Yiewsley and more widely across Hillingdon with the nearest Car Club to the Site being in West Drayton.

### **OTTERFIELD ROAD SITE**

5.132 As set out above, 23 car parking spaces will be provided for the residential use of which 5 spaces will be for disabled persons. Parking bays will be provided around the south-eastern boundary of the building. Two spaces are also provided for the library.

5.133 In terms of accessing the Site, an access point will be provided from the car park access road and a simple vehicular crossover will be delivered to serve the Site. The proposed crossover has been designed in accordance with Manual for Streets and TfL guidance. Footways will be provided on either side of the site access road and will connect to the existing footways on the Fairfield Road car park access. The northern footway on the Fairfield Road car park access road will be realigned in a southerly direction to create a better walking route from that site to the Otterfield Road Site. The proposed layout is demonstrated on the accompanying drawings, prepared by Hunters.

5.134 The Trip Generation assessment for the Site identifies that there will be a maximum of 7 new vehicles travelling north and 1 travelling south which equates to a maximum of 1 vehicle every 7 minutes. This has been concluded to have a very little impact on the local highway network.

5.135 Car Club services operated by HiyaCar are also located throughout Yiewsley and more widely across Hillingdon with the nearest Car Club to the Site being in West Drayton.

### **CAR PARKING**

5.136 The NPPF requires Local Authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.

5.137 London Plan Policy T6.1 (Residential Parking) states that developments should not exceed the maximum parking standards set out in Table 10.3. Table 10.3 identifies that all development proposals with a PTAL rating of 3 should provide a maximum parking provision of up to 0.75 spaces per dwellings. The London Plan does not provide car parking space requirements for community uses.

5.138 Part G of Policy T6.1 states that disabled parking should be provided for new residential developments. Residential development proposals delivering ten or more units must as a minimum ensure that three per cent of dwellings, at least one designated disabled parking bay per dwelling is available from the outset. Development proposals are further required to demonstrate through a Parking Design and Management Plan how an additional seven per cent of dwelling could be provided with on designated disabled person's parking spaces per dwelling.

5.139 London Plan Policy H1 requires the potential for housing delivery on all suitable and available brownfield sites to be optimised, especially for sites with existing or planned PTALS of 3-6 or which are located within 800m of a station or town centre boundary. The Application Site has a PTAL rating of 3, is within a town centre and is within 800 metres of West Drayton train station and it is therefore imperative that the Site is optimised in accordance with this policy, rather than Policy T6.1 and Policy T6, without comprising the high proportion of affordable housing provided within the Proposed Scheme.

5.140 The London Plan further requires the provision of 20% of all spaces to provide active electric charging points, with the remainder of the spaces providing passive provision for electric vehicles in the future.

5.141 Policy DMT 6 (Vehicle Parking) in Part 2 of the Local Plan identifies that development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. Further, all car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users. The Local Plan does not provide car parking space requirements for community uses.

5.142 Appendix C Table 1 in the Local Plan sets out the minimum car parking requirements for new flatted developments. The following is required.

- Studio: 1 space per 2 units
- 1 – 2 bedrooms: 1.5 - 1 spaces per unit
- 3 – 4 bedrooms: 2 spaces per unit

5.143 The Proposed Development seeks to provide a total 55 car parking spaces as part of the Scheme. There will be 27 spaces located at the OR Site, 13 spaces at the FL Site, and 15 spaces at the FL Site that will be provided for the Rabbsfarm school drop-off / pick-up activities (park and stride spaces). The proposed car parking provision equates to 0.57 spaces per dwellings based on 95 residential units and a total of 55 car parking spaces, as such, provision meets the London Plan Policy T6.1 as it does not exceed the 0.75 ratio requirement.

## FALLING LANE SITE

5.144 As set out within Section 3, the FL Site will provide 13 car parking spaces at ground floor level for residential use, in accordance with London Plan standards. 5 of these spaces will be wheelchair accessible.

5.145 15 replacement car parking spaces for use by Rabbsfarm Primary School for drop-off / pick-up activities (Park & Stride spaces). These will be located near the vehicular access to Falling Lane Road to prevent vehicles from parking further into the Development and close to the pedestrian routes leading to the School, with a safe pedestrian access zone provided within the car park.

## OTTERFIELD ROAD SITE

5.146 With regards to the OR Site, the Proposed Development seeks to provide a total of 23 residential car parking spaces, of which 5 will be wheelchair accessible and 2 car parking spaces for the library which will both be wheelchair accessible.

5.147 A total of 36 residential car parking spaces split across the two Sites is proposed, including a total of 10 wheelchair accessible spaces, 15 car parking spaces for Rabbsfarm Primary School within the Falling Lane Site and 2 car parking spaces for the new library at the Otterfield Road Site.

5.148 In summary of the above, we consider that the quantum of parking is acceptable and aligns with both the adopted policy regarding accessible parking provision, particularly in light of the both Site's accessible location and promotes the use of public transport, cycle and walking.

5.149 We acknowledge that the proposed level of car parking spaces is below the London Plan parking standards and the local plan standards, however these are maximum requirements and therefore, we consider it to be sufficient in light of the Site's Town Centre location, close proximity to good public transport links and local amenities.

## CYCLE PARKING

5.150 Paragraph 106 of the NPPF requires developments to provide for high quality walking and cycling networks and supporting facilities such as cycle parking.

5.151 Policy T5 (Cycling) of the London Plan requires the following cycle parking provision to be delivered within residential developments:

1. Long stay: 1 space per studio or 1 person 1 bedroom dwelling, 1.5 spaces per 2 person 1 bedroom dwelling, 2 spaces per all other dwellings.
2. Short stay: 2 spaces for 5-40 dwellings, thereafter 1 space per 40 dwellings.

5.152 Table 10.2 of this policy sets out the following requirements for cycle parking for Use Class D1, in respect of the new library at the Otterfield Road Site:

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1. Long stay: 1 space per 8 FTE staff
2. Short stay: 1 space per 100 sqm

5.153 Policy DMT 5 (Pedestrians and Cyclists) in Part 2 of the Local Plan outlines that development proposals will be required to ensure that safe, direct and inclusive access for pedestrian and cyclists is provided on the site connecting it to the wider network.

5.154 Appendix C Table 1 in the Local Plan identified the following cycle parking requirements for residential development:

- 1 cycle parking space per 300 sqm within town centre locations
- 1 cycle parking space per studio, 1 or 2 bedroom units
- 2 cycle parking spaces per 3 or more bedroom units

5.155 A total of 188 parking cycle parking spaces are provided within across both Sites, with 90 spaces at the FL Site provided in two stores at ground floor level and 88 spaces at the OR Site provided in three storeys at ground floor level. 10 of these

spaces will be short-stay and will be specifically provide for the new library. The proposed cycle parking provision is in accordance with the London Plan and the Local Plan.

5.156 In combination, the provision of cycle spaces delivered within the scheme exceeds both the London Plan and Local Plan policy requirements.

## ECOLOGY AND BIODIVERSITY

5.157 The NPPF promotes biodiversity in recognition of its role in supporting the natural and local environment, under paragraph 174, by requiring planning policies to protect sites of biodiversity value and provide net gain for biodiversity.

5.158 London Plan Policy G6 (Biodiversity and Access to Nature) states that development proposals should mitigate impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

5.159 Furthermore, Local Plan Policy DME1 7 (Biodiversity Protection and Enhancement) within Part 2 identifies that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Further, if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects.

5.160 In addition, the policy states that proposals that result in significant harm to biodiversity which cannot be avoided, mitigated or, as a last resort, compensated for will be refused.

5.161 Policy EM7 of the Local Plan (Biodiversity and Geological Conservation) seeks to protect biodiversity features from inappropriate development, and encourages the provision of biodiversity improvements from all developments, including green roofs and walls where feasible.

5.162 With regards to the FL Site, the accompanying Ecological Appraisal, prepared by ECOSA Ltd identifies that the Site currently supports limited biodiversity in terms of habitats and protected species. It does however state that there is a potential for adverse impacts upon breeding birds and European hedgehogs (See further below).

5.163 In relation to the OR Site, the accompanying Ecological Appraisal identifies the following habitats at the Site during the Phase 1 Habitat Survey: Scattered Scrub, Ephemeral/Short Perennial and hardstanding tarmac.

5.164 The following measures are recommended at the Sites:

- Non-designated sites located nearby (60 metres north west, 240 metres to the west and 400 metres to the west) – Construction Environment Management Plan to include measures to minimise and control dust emissions;
- Habitats – Scattered trees should be retained on site where possible and the proposed landscaping will provide new grassland habitat, shrub planting and trees, these will include a mix of native species planting and be managed to maximise their benefit to wildlife;
- Badger – a presence/absence survey should be carried out to determine if the entrances on site are active and if badger are occupying them. Thereafter, full mitigation measures will be provided.

- Birds – Vegetation clearance will be undertaken outside the main breeding bird season of March to August (inclusive) and active nests will be left with a suitable buffer until nesting ends. The loss of suitable nesting and foraging habitat will be compensated for by the planting and appropriate management of new shrubs and trees; and
- Other Relevant Species – Deep excavations will be covered overnight, or if not possible, a suitable ramp will be inserted in order to allow trapped animals to escape during the construction phase. A 13 centimetre by 13 centimetre gap will be left under any garden fences to maintain ecological permeability across the developed area and will give European hedgehog access to potentially suitable habitat within the back gardens of residential properties. Further, one hedgehog house should be installed along boundary habitats at both of the Sites as an enhancement measure.

5.165 The Ecology Appraisal concludes that the Site is assessed as potentially supporting badger as well as having suitability for breeding birds and European Hedgehog and thus, further survey works is suggested for badger. Following this survey work, further mitigation measures in addition to the above will be suggested.

5.166 The Appraisal considers that there is scope for mitigation and enhancement measures to be provided as part of the proposals subject to the findings of further survey works and incorporation of measures in this report in order for the Proposed Development to accord with national and local policies relating to ecology. We consider that this can be secured by an appropriately worded planning condition.

### **URBAN GREENING FACTOR**

5.167 Policy G5 (Urban greening) of the London Plan sets out that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. A target Urban Greening Factor (UGF) of 0.4 is recommended for developments that are predominately residential and 0.3 for those predominately commercial developments.

5.168 Policy EM4 of the Local Plan (Open Space and Informal Recreation) states that the network of open spaces will be safeguarded, enhanced and extended, recognising their role in serving local communities and encouraging active lifestyles by providing spaces within talking distance of homes. There will be a presumption against any net loss of open space in the Borough and major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancement of existing facilities.

5.169 Additionally, the Council seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover for the benefit of wildlife and a healthier lifestyle.

5.170 As explained above, there is limited amount of greenery on both Sites and where some exist, it is of low quality. The Proposed Development will deliver a UGF score of 0.38 at the FL Site and 0.35 at the OR Site, against a target of 0.4, as required by London Plan Policy G5.

5.171 Whilst it is acknowledged this falls slightly short of the identified target of 0.4 for residential developments, the accompanying landscaping chapter within the Landscaping Report, demonstrates that the opportunities to deliver green infrastructure on the Site have been maximised. It is also worth highlighting that significant improvement works are proposed to the Recreation Ground which should be assessed as part of this within the planning balance.

## ENERGY AND SUSTAINABILITY

5.172 Section 14 of the NPPF relates to 'Meeting the challenges of climate change, flooding and coastal change' and states that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5.173 Paragraph 154 of the NPPF states that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Paragraph 157 requires new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

5.174 Policy SI2 (Minimising greenhouse gas emissions) of the London Plan outlines that major developments should be net zero-carbon, which means reducing carbon dioxide emissions in operation and minimising both annual and peak energy demand in accordance with the following 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 onsite; and
- Be seen: monitor, verify and report on energy performance.

5.175 Policy SI4 (Managing heat risk) of the London Plan outlines that 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 cooling hierarchy.

5.176 Policy SI5 (Water Infrastructure) of the London Plan requires development proposals to achieve at least the BREEAM excellent standard for the 'Wat 01 water category' or equivalent for commercial developments.

5.177 Policy SI7 (Reducing waste and supporting the circular economy) of the London Plan sets out that resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. Developments should encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products.

5.178 This Application is accompanied by an Energy Statement and has been prepared by Futureserv in line with the planning policy requirements set out above. The proposed Energy Strategy exceeds the mandatory 35% CO2 reduction target, in compliance with Part L1A of the Building Regulations, and seeks to provide a cash-in-lieu contribution to the Council to offset the remaining carbon emissions to contribute towards the 100% target, in accordance with the GLA's requirements.

5.179 In total, the overall reduction of CO2 emissions equates to 63.9%. This exceeds the mandatory 35% CO2 reduction target as required within Part L1A of the Building Regulations. In addition, a financial contribution totalling to £3,936.15 will be provided to deliver a net zero carbon development, in accordance with the GLA's requirements. The total cost will be split across the Site as set out in the table above.

## **FIRE SAFETY**

5.180 Policy D12 (Fire Safety) of the London Plan requires developments to achieve the highest standards of fire safety. All major development proposals are required to be submitted with a Fire Statement, which is an independent fire strategy produced by a third party suitably qualified accessor. The statement should detail how the development proposal will function in terms of the building's construction methods, products and materials, means of escape for all building users, features which reduce the risk to life, access for fire service personnel, provision within the curtilage of the Site to enable fire appliance to gain access to the building and ensuring that any potential future modifications to the building will take into account.

5.181 Regional policy requires all major development proposals to be submitted with a Fire Statement. An Outline Fire Statement has been prepared by Hydrock and is submitted as part of this Application. In line with the London Plan, this Statement identifies the means of escape for the building including means of escape for mobility impaired persons, sets out requirements of construction, the assembly points for all proposed blocks, details of firefighting access and the active fire safety systems that are to be installed, such as fire detection and alarm systems, smoke ventilations, emergency signage and lighting and Automatic Water Fire Suppression Systems (AWFSS).

## **FLOOD RISK AND DRAINAGE**

5.182 A Flood Risk Assessment (FRA) has been produced by Infrastruct CS Ltd and accompanies this application. The Site lies within Flood Zone 1 and therefore has a low probability of flooding.

5.183 Paragraph 159 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at the highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 166 states that where planning applications come forward on sites allocated in the development plan through the sequential tests, applicants need not apply the sequential test again.

5.184 Paragraph 167 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The policy further requires a site specific Flood Risk Assessment be submitted with planning applications for all sites greater than 1 ha in Flood Zone 1, for sites of any size within Flood Zone 2 and 3.

5.185 Policy SI5 (Water Infrastructure) of the London Plan states that development proposals should minimise the use of mains water in line with the operational Requirement of Building Regulations, achieving mains water consumption of 105 litres or less per head per day.

5.186 Policy SI12 (Flood Risk Management) of the London Plan requires that current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers. This Policy outlines that all development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Further, proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan.

5.187 Policy SI 13 (Sustainable Drainage) of the London Plan requires development proposals to aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy.

5.188 Local Policy EM6 of Part 1 of the Local Plan encourages development to be sited away from the areas of highest flood risk (Zone 2 and 3), and all development will be required to use sustainable urban drainage systems (SUDS).

5.189 At the FL Site, most of the site area will be impermeable including the parking bays and the access driveway due to the presence of the underground car park. All run off will be collected and conveyed via a pipe network into cellular attenuation tank (22m<sup>2</sup> x 1.2m deep), located beneath the building. The proposed SUDS features will comprise of green roofs and an attenuation cellular storage tank located underneath the new building.

5.190 The water will flow by gravity to the public sewer in Falling Lane. This feature has been sized to accommodate a 1 in 100 years storm event, including a 40% allowance for climate change. Further, 350 sqm of green roofs are also proposed at this Site. With regards to the proposed foul water drainage system, the proposals seek to connect the foul water from the FL Site into a new lateral to the north, into Falling Lane. This is subject to a Section 106 Agreement from Thames Water.

5.191 At the OR Site, the parking bays next to the building will have permeable paving surfaces because that is where oil spillage is likely to occur and adequate aggregate sub-bases, permeable paving provides water quality treatment as it breaks down hydrocarbons. For the main cross road, it is proposed to use gullies that will collect the runoff and through a pipe network, discharge it into the ground using cellular soakways. It is proposed to collect runoff from the roofs and conveyed via a pipe network into cellular soakways. 210 sqm of green roofs are proposed at this Site as an additional measure to collect water. With regard to SUDS, it is proposed that the development will consist of permeable paving and cellular soakaways.

5.192 The proposal seeks to discharge foul water from the development site into the existing foul drainage network running east towards Otterfield Road along the access road, located to the south. It is evident that this will increase the flow rates and volumes of foul sewage into the network, however a capacity enquiry was submitted to Thames Water and no capacity issued were identified for the Proposed Development at this Site. Therefore, no issues will be caused as a result of this proposed strategy.

5.193 The accompanying Flood Risk Assessment and Drainage Strategy produced by Infrastructure CS Ltd conclude that the Proposed Development is not considered at high risk from any other sources of flooding at both sites.

## **NOISE**

5.194 A Noise Assessment has been prepared by Bloc Consulting and forms part of this Application. The report assesses the potential impact this development may have on surrounding local area and also how existing noise environment can be mitigated appropriately for the scheme.

5.195 Paragraph 185 of the NPPF requires developments to mitigate and reduce to a minimum the potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life.

5.196 Policy D14 (Noise) of the London Plan states that 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 avoiding significance adverse noise impacts on health and quality of life, reflect the Agent of Change principles, mitigate and minimising the

existing and potential adverse impacts of noise as a result of new development and improving and enhancing the acoustic environment and promoting appropriate soundscapes.

5.197 Local Policy EM8 of Part 1 of the Local Plan states that the Council will promote the maximum reduction in noise levels and will minimise the number of people potentially affected by new developments. As such, the Council will seek to ensure that noise sensitive development and noise generating development are only allowed if noise impacts can be adequately controlled and mitigated.

5.198 A Noise Impact Assessment, prepared by Bloc Consulting has been submitted in support of the Application which assesses the existing noise conditions at the Site and the potential suitability of the noise environment for the proposed residential uses. Given that the Site is in a town centre location, noise constraints were identified as a result of the assessment. The Report includes a number of recommendations including mitigation measures in the form of sound insulation within the external building fabric, glazing and mechanical ventilation. These noise protection measures would be controlled by way of a condition.

## AIR QUALITY

5.199 An Air Quality Assessment (AQA) has been prepared by XCO2 and accompanies this application.

5.200 Paragraph 186 of the NPPF supports opportunities to improve air quality or mitigate impacts where necessary.

5.201 London Plan Policy SI 1 (Improving air quality) states that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits or delay the date at which compliance will be achieved or create unacceptable high levels of exposure to poor air quality. In order to achieve this, the Mayor will require development proposals to be at least Air Quality Neutral and be designed to prevent and minimise increasing exposure. Major development proposals will be required to be submitted with an Air Quality Assessment to show how the proposal accords with the requirements set out above.

5.202 Policy EM8 (Land, Water, Air and Noise) within Part 1 of the Local Plan requires all development to protect both existing and new sensitive receptors, and not result in the deterioration of local air quality. In addition, all major developments within Air Quality Management Areas (AQMAs) should be air quality neutral whilst actively contributing to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with clear transport fuels.

5.203 The Proposed Development is located within an Air Quality Management Area (AQMA), with the FL Site within the West Drayton/Yiewsley Focus Area (FA) and the OR Site within the FA Catchment Area. As a result, new developments in such locations should incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor.

5.204 At the FL Site, the AQA found that the predicted annual mean PM10 and PM2.5 concentrations at ground floor level across the Proposed Development are well within the current long-term air quality objectives for the protection of human health. Due to the Site's town centre location, the background noise (11.6 µg/m<sup>3</sup>) that was assessed as part of this exercise is already in exceedance of the Government's 2040 concentration target but is below the 2028 interim target of 12 µg/m<sup>3</sup>. On this basis, it has been identified that following the implementation of increasingly stringent legislative measures aimed at reducing PM2.5 emissions, concentration at this Site in the future, post-development, would be anticipated to be lower than predicted.

5.205 With regard to the OR Site, the predicted concentration levels are less than 50% of the 60 µg/m<sup>3</sup> threshold for this area and therefore the risk of non-compliance at this Site is negligible.

5.206 An Air Quality Neutral Assessment have also been provided within the AQA which confirms that that due to the use of Air Source Heat Pumps and the reduction of vehicle trips, the Proposed Development is therefore Air Quality Neutral with respect of both building and transport related emissions.

5.207 Mitigation measures have been recommended to be implemented during the construction stage of the development.

5.208 Based on the assessment results, the entire Site is considered suitable for the proposed end use subject to the inclusion of relevant mitigation measures. In light of this, the above assessment is wholly in accordance with the London Plan, LBH policies and relevant legislation having incorporating the suggested mitigation measures into the Scheme.

## ARBORICULTURE

5.209 Within the London Plan, Policy G7 (Trees and Woodlands) states that development proposals should ensure that, wherever possible, existing trees of value are retained. The Policy further states that if planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed.

5.210 Part 1 of the Local Plan: Policy ME4 (Open Space and Informal Recreation) seeks to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.

5.211 A Tree Survey Report has been prepared by Trevor Heaps Arboricultural Consultancy Ltd for the FL Site and OR Site to support this Application.

5.212 As set out within the accompanying Reports, it is proposed that 10 trees are to be removed on the FL Site and that no trees will be removed on the OR Site.

5.213 The removal of 10 trees is necessary to facilitate development, as explained within the Arboricultural Report for the FL Site. The breakdown of the trees to be removed at the FL Site is as follows:

- Category A – 1
- Category B – 5
- Category C – 4

5.214 The Category A tree needs to be removed in order to enable development, however considering that a number of new trees are to be planted at both Sites, including within the Recreation Ground, we consider that the harm arising from this can be mitigated. This view is supported within the conclusions of the Report.

5.215 Furthermore, the Report concludes that there is an identified risk that the crowns and stems of T2 and T6 could be accidentally damaged during development. To minimise this risk, protective fencing will be erected in front of their stems and where space allows, along their canopy extends at the FL Site. Overall, the Report concludes that there are no

adverse effects on stability, and if an encroachment does not significantly reduce the overall assimilative function of the root system, it is unlikely to cause harm.

5.216 An Arboricultural Method Statement (AMS) is provided within this document which identifies a methodology that it is essential to be followed in order to protect existing trees during construction works. This should be read in conjunction with the supporting Tree Protection Plan set out in Appendix 9.

5.217 In relation to the OR Site, the Arboricultural Report identifies that the proposed works are within influencing distance of several trees and therefore basic tree protection measures and AMS is provided to ensure that there are not detrimentally affected during construction works. It further identified that there is a potential risk of accidental damage to the stem of Poplar T1 and to the low branches of existing trees which are to be retained during the construction phase. This risk will be mitigated by boxing in the stem of Poplar T1 with wood plyboards and the low branches will be cut back and/or crown lifted to 5m above the access road. However, the Report states that this will not affect the health or appearance of the trees. Furthermore, all vulnerable areas will be separated from the construction area by protective fencing and ground protection.

5.218 The Report concludes that the proposal will not result in appropriate development upon the trees located nearby.

5.219 In light of the above, the Proposed Development accords with Policy G7 of the London Plan and Policy ME4 of Part 1 of the Local Plan.

## **CONTAMINATION**

5.220 A Phase 1 Preliminary Risk Assessment has been undertaken by CGL and accompanies this application.

5.221 Paragraph 183 of the NPPF requires planning policies and decisions to ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

5.222 Policy DMEI 12 of Local Plan Part 2 (Development of Land Affected by Contamination) states the following:

- A. Proposals for development on potentially contamination 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.

5.223 A Phase 1 and Phase 2 Investigation was carried out by CTS Group at both the FL Site and OR Site. Both assessments accompany this Submission.

5.224 In terms of the OR Site, the assessment identified that the risk from inhalation, ingestion and direct contact of contaminants to future site users, construction workers and buried services is judged to be moderate due to the Proposed Development, having had regard to the highly sensitive landscaping and garden areas. At the FL Site, this risk is identified as high on the assumption of 'residential with plant uptake' as the end use. In addition, the risk to buildings and services was deemed moderate due to detectable levels to lead, arsenic and PAHs detected samples across the Site.

5.225 In light of the findings above, the assessments recommend that a remediation strategy is required, including a remediation method statement and verification of remediation undertaken for both sites. Further, it is suggested that intrusive investigation of the proposed soft landscaping and garden areas is undertaken to assess human health risk. In terms of the FL Site, this is also to compare the necessary Suitable for Use Levels for 'residential with plant uptake'.

5.226 Consequently, we envisage that the Applicant will pursue the recommended measures and that this will be secured by an appropriate planning condition to ensure that any potential contamination is mitigated.

## **WASTE AND REFUSE**

5.227 London Plan S1 7 (Reducing Waste and Supporting the Circular Economy) sets out the recycling targets for London and requires developments to be designed in such a way that it provides adequate, flexible and easily accessible storage space and collection systems that support such targets.

5.228 The Mayor's SPG on Sustainable Design and Construction also identifies a set of essential standards in relation to waste. These include:

- Minimise, reuse and recycle demolition waste;
- Specify use of reused or recycled construction materials; and
- Recycling facilities should be as easy to access as waste facilities.

5.229 Policy EM11 of Part 1 of the Local Plan states that the Council will aim to reduce the amount of waste produced in the Borough. To achieve this, the Council will require all new developments to address waste management at all stages of a development's life from design and construction through to the end use and activity on site.

5.230 As discussed above, there will be 2 communal bin stores provided at the FL Site, bin store 1 will be located east of the main pedestrian entrance and bin store 2 is adjacent to the vehicular entrance on Falling Lane Road. The refuse stores are located within close proximity to Falling Lane Road and will be within the recommended distance of < 30 metres, thereby improving vehicle movement of bin collection. The refuse storage spaces will operate as a communal storage system and is compliant with waste and refuse standards for all proposed residential units.

5.231 The refuse arrangements include residents to take their waste to their bin storage areas adjacent to the 2 cores on the Ground Floor. The refuse stores are positioned within close proximity to Falling Lane Road to improve vehicle movement of bin collection and avoid any potential disturbances to the public.

5.232 It is estimated that the new residents at the FL Site will generate a weekly waste of 7,730 litres. As a result, 7 1,100 litre bins are required to accommodate waste at the Site. This aligns with the guidance provided within the Council's *Guidance for Waste and Recycling Storage and Collection Document*.

5.233 In terms of the OR Site, refuse collection will take place from within the Site. A Swept Path Analysis has been undertaken by i-transport which has concluded that refuse vehicles are able to get within 10m of the bin store for collection and therefore are able to traverse in and around the Site in a safely manner. The proposed layout of the Scheme has been carefully designed to ensure this.

5.234 It is estimated that the new residents at the OR Site will generate a weekly waste of 6,810 litres. As a result, 6 1,100 litre bins are required to accommodate waste at the Site. This aligns with the guidance provided within the Council's *Guidance for Waste and Recycling Storage and Collection Document*.

5.235 Food waste collection bins are also provided at both sites.

5.236 The proposed arrangements set out above have been given much consideration to ensure efficient and safe movement at both Sites and therefore are in accordance with London Plan Policy SI 7 and Local Plan Part 1: Policy EM11, Local Plan Part 2: DMHB11 and the Council's *Guidance for Waste and Recycling Storage and Collection Document*.

# 6.0 PLANNING BALANCE

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.
- 6.2 Having regard to the assessment undertaken in this Statement, we consider that the proposals comply with the Development Plan when read as a whole.
- 6.3 The Proposed Development would make best use of previously developed land (Falling Lane) and under-utilised, abandoned land that has a history of containing built form (Otterfield Road), both falling within a designated town centre boundary, therefore complying with Policy DMTC 1 and SD6.
- 6.4 The existing library is no longer fit for purpose and its replacement would represent both a quantitative and qualitative improvement in space and is supported by London Plan Policy SD6, Policy CI1 (Local Plan Part 1) and Policies DMCI 1 and Policy DMTC 2 (Local Plan Part 2). It would therefore comply with Policy SD6, CI1, DMTC 1 and DMTC 2.
- 6.5 The proposals would also deliver a significant quantum of new housing for the Borough and comply with the objectives of London Plan Policies SD6 and SD7 and Core Strategy Policy 6. All of the residential units proposed as part of this Application are to be affordable homes and will all be Social Rent tenure (95 units). The provision of a 100% affordable housing scheme will contribute towards the London-wide shortage of delivering affordable homes. This will also assist the Council with meeting their affordable housing targets and ensuring the Borough are able to accommodate those in need. As such, the provision of affordable housing is 100% and therefore exceeds the 50% strategic target set by the Mayor and the 35% target set by the Council.
- 6.6 The quality of accommodation being delivered would be high with exceedances in amenity space and good compliance against BRE standards. As such, we consider that it would be compliant with London Plan Policy D6 and Local Plan Policy DMHB 11 and BE1.
- 6.7 The massing would be of a scale that optimises the Site's potential in accordance with London Plan Policy D6 and Local Plan Policy DMHB 17 with no harmful impact on the amenity of neighbouring properties in compliance with Local Plan Policy BE1. Architecturally, the scheme demonstrates robust and attractive design complying with London Plan Policy D3 and Policy BE1. The proposal would also comply with relevant policies relating to transport, energy and drainage.
- 6.8 The Proposed Development would cause some harm as result of the removal of several trees on the FL Site, one of which is a Category A tree. Whilst this is regrettable, the removal of such trees is necessary to facilitate the development and comply with other strategic policy objectives, as well as deliver the wider planning benefits set out below. The loss of these trees is also mitigated in quantitative terms by an overall net increase in tree planting across the Sites. Therefore, whilst we find some conflict in compliance with Local Plan Policy ME4, we consider that the weight attached to other development plan policies that support the development of the Site is greater and outweighs this non-compliance. Therefore, we consider that the proposed is compliant with the development plan when read as whole.
- 6.9 Notwithstanding our view that the Proposed Development is compliant with the development plan when read as whole, should the decision-maker come to an alternative view and identify conflict with the development plan when read as a whole, there are clear benefits of the Proposed Development which are material considerations and which we consider, in the planning balance, outweigh such conflict. In this regard, the scheme would as follows:

- Optimise previously developed land (FLS) and underutilised land (ORS) in a sustainable town centre location;
- Deliver 95 affordable dwellings, equating to an overall provision of 100% affordable housing, all of which will be Social Rent. This will assist the Council in accommodating the needs of the Borough as well as positively contributing towards reducing the social housing register waiting list;
- Replace the existing library with a larger new library with greater accessibility and adhering to modern day requirements in terms of energy efficiency and fire safety;
- Deliver new housing to meet the Borough's identified needs, which will consist of a balanced mix of residential unit sizes, all of which would meet the minimum space standards and best practice space standards;
- Create private and communal amenity spaces for all future residents that meet and exceed minimum standards space requirements; and
- Provide on-site play space provision at the OR Site and provide improvements to existing playspace at the Yiewsley Recreation Ground;
- Enhance pedestrian connectivity to and from the OR Site and the wider area to the Recreation Ground;
- Provide significant tree and shrub planting across the Sites, including 7 new trees at the FL Site, 35 new trees at the OR Site and 30 new native trees within the Recreation Ground, to mitigate the removal of 9 existing trees at the FL Site;
- Showcase high quality and robust architectural design; and
- Deliver a 63.9% reduction in carbon emissions, well above the policy target of 35% target with a financial contribution to meet the shortfall to become carbon neutral.

6.10 It is therefore, in our opinion, clear that when applying the planning balance as required by Section 38(6) of the Planning Act that the benefits as set out above outweigh any possible harm such that planning permission should be granted

# 7.0 SUMMARY AND CONCLUSIONS

7.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for Full Planning Permission by London Borough of Hillingdon for the comprehensive redevelopment of two parcels of land, one at Yiewsley Library, Falling Lane and the other at Former Yiewsley Pool, Otterfield Road.

7.2 This application seeks Full Planning Permission for the following formal Description of Development:

*“Demolition of existing Yiewsley Library Building and the erection of a new residential building on the Yiewsley Library site (Falling Lane) and the erection of a new mixed use building on the former Yiewsley Swimming Pool site (Otterfield Road), with a replacement library at ground floor level and residential uses above”.*

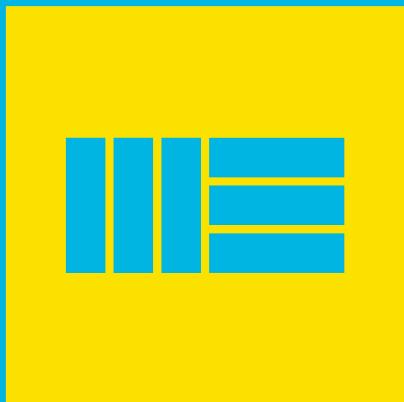
7.3 This Planning Statement has assessed the proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.

7.4 A suite of technical reports have been prepared and submitted as part of this planning application. This Planning Statement pulls all this together providing a detailed planning policy analysis, considering the Proposed Development in the light of the relevant policies of the adopted Development Plan, as well as other material considerations.

7.5 When assessed against the Development Plan when read as a whole, we consider that the Proposed Development is compliant and as such planning permission should be granted. The proposals represent wholly sustainable development in accordance with the NPPF.

7.6 Notwithstanding our view that the Proposed Development is compliant with the development plan when read as whole, should the decision-maker come to an alternative view and identify conflict with the development plan when read as a whole, there are clear benefits of the Proposed Development which are material considerations and which we consider, in the planning balance, outweigh such conflict.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALLY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.