

4 February 2016

**Old Coal Depot, Tavistock Road, West Drayton**

in the London Borough of Hillingdon

planning application no. 18736/APP/2015/4457

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**The proposal**

Demolition of existing buildings and redevelopment of site to provide a materials recovery and recycling facility and Civic Amenity site, incorporating a recovery and recycling building, storage bays, administration office/training building, external processing and storage area, two weighbridges, reuse and extension of railway sidings, and Civic Amenity Centre, together with associated car parking, landscaping, fencing and infrastructure.

**The applicant**

The applicant is **Powerday Plc** and the agent is **Barton Willmore**.

**Strategic issues**

The development proposals have significant potential to support and capture the benefits of waste recycling and contribute to the Mayor's recycling level targets and deliver the Mayor's waste policy. However, there are a number of key transport issues that the applicant needs to resolved prior to this scheme being referred back to the Mayor.

**Recommendation**

That Hillingdon Council be advised that while the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan, for the reasons set out in paragraph 82 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

**Context**

1 On 22 December 2015, the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 2B point 1 and 2 of the Mayor of London Order 2008:

- *2B(1) 'Waste development to provide an installation with capacity for a throughput of more than... b) 50,000 tonnes per annum of waste; produced outside the land in respect of which planning permission is sought.*

3 Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

5 The site is an irregular shaped site comprising approximately 5.57 hectares and is located at the Old Coal Depot, Tavistock Road, Yiewsley, which is approximately 3 kilometres from Junction 4 of the M4. Disused railway sidings are located on the site.

6 To the south, the site is separated from the Great Western Railway West Wales to London Paddington Main Line by a block of land currently utilised as a minerals and aggregate storage depot, which contains some existing scrub and tree planting. A further scrub and tree belt lies between the site and the block of land mentioned above, directly south of the existing office building towards the south eastern corner of the site.

7 The site is bounded by rail lines on all four sides, with a single point of access from Tavistock Road via a level crossing on the eastern side of the site. Tavistock Road forms part of the borough road network, with the closest part of the Transport for London Road Network (TLRN) being the A4 Bath Road approximately three kilometres to the south.

8 West Drayton station is located 300 metres east of the site entrance and is served by First Great Western rail services into London Paddington. Crossrail will also service this station upon the opening of the line in 2019.

9 Five bus routes operate along the High Street, looping via the station (which serves bus routes 220, 350, U1, U3 and U5) interchange. As such the site records at its entrance a public transport accessibility level (PTAL) of two out of one to six, where one represents poor public transport accessibility and 6 is excellent. However, this value reduces to zero at the western end of the site, as it is beyond the maximum 960 metres walking distance to the station.

10 The site is currently used for mixed B2 (maintenance, cleaning and transfer of skips and 'wheelie bins') and B8 Uses (the storage of skips) and incidental lorry parking as well as a Civic Amenity Site for one weekend a month as part of Hillingdon Council's 'Golden Weekend' initiative. The remainder of the site is predominately vacant.

## **Details of the proposal**

11 The applicant is intending to provide the following buildings and structures:

- **A Materials Recovery and Recycling Building (MRRF):** to provide 15,581sq.m. gross floorspace with a maximum height of 18.5 metres which would be located centrally within the site. The MRRF would have a total capacity of 450,000 tonnes of waste per annum, with 330,000 tonnes delivered by road and 120,000 tonnes delivered by rail. It would accept domestic waste; construction, demolition and excavation waste; and, commercial and industrial waste. It is understood by GLA officers that the material would be imported and exported by road and rail.
- **Storage bays:** it is proposed that the storage area would also house materials associated with the construction industry as well as providing storage in association with the wood and concrete processing.
- **External processing and storage areas:** (to include concrete and wood processing and inert material storage), to be provided on the western side of the site boundary in proximity to the railway and container storage (in association with the rail operation and maintenance).
- **Offices:** and associated car parking. The offices would be contained in a newly constructed two-storey building located just to the east of the existing entrance to the site, which would have a gross floorspace of approximately 480sq.m. The office building would consist of a reception area, meeting rooms and an education/training centre on the ground floor and general office accommodation throughout the remainder of the building. The office car parking would be provided for both employee and visitor use in line with the Council's standards.
- **A platform:** to provide access to an existing rail siding which would be retained and extended to provide rail access to the site. A buffer would be required at the western end of the sidings for the purposes of rail safety.
- **Two weighbridges:** to be located at the site entrance.
- **A civic amenity site:** including 22 parking bays and provision for eight containers to receive normal waste from households as well as other wastes.
- **Landscaping and fencing:** to include tree planting, the erection of an acoustic barrier fence and palisade fence.
- **Associated infrastructure:** including roads, hardstanding and parking areas.

## Case history

12 On 14 August 2013, the Mayor of London reviewed a report at the development site for:

- *Demolition of existing buildings and redevelopment of site to provide a materials recovery and recycling facility and Civic Amenity site, incorporating a recovery and recycling building, storage bays, administration office/training building, external processing and storage area, two weighbridges, reused and extension of railway sidings, and Civic Amenity Centre, together with associated car parking, landscaping, fencing and infrastructure.*

13 The Mayor advised that the development broadly complied with the London Plan; however, there were some outstanding issues that needed to be resolved (D&P/2536/01). On 10 December 2013, Hillingdon Council resolved to refuse planning permission for the application. On 7 March 2014 the Deputy Mayor, Government Relations, considered an updated report and subsequently advised Hillingdon Council that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, as there was no sound planning reason for the Mayor to intervene (D&P/2536/02).

14 The Council's draft decision notice included the following reasons for directing refusal:

- *The proposal involves a significant number of traffic movements, including many heavy goods vehicles and the application fails to provide an accurate assessment of highways and transportation impact associated with the proposed development and as such the scheme fails to demonstrate that it would not be detrimental to highway and pedestrian safety and the free flow of traffic contrary to policies AM7 and LE1 of the Hillingdon Local Plan Part 2 Saved policies, policies 5.17 and 6.3 of the London Plan and paragraph 32 of the National Planning Policy Framework.*
- *The proposed development will significantly increase the traffic passing over the level rail crossing and in the absence of a full risk assessment in respect of the use of the level crossing the application fails to demonstrate that it would be safe for the public and rail operators, contrary to policies AM7 and AM11 of the Hillingdon Local Plan Part 2 Saved Policies, policies 2.6, 6.2, 6.3 and 6.4 of the London Plan and paragraph 32 of the National Planning Policy Framework.*
- *The applicant has failed to demonstrate that the air quality impacts of the development would not be unacceptable. The scale and magnitude of the development requires a much greater understanding of the air quality impacts and without this no proposed assessment of mitigation can occur. The extent of the impacts is not sufficiently clearly set out in the Air Quality Assessment. Accordingly, the proposal is contrary to Policy 7.14 of the London Plan and the Council's Supplementary Planning Guidance on Air Quality and the provisions set out in the National Planning Policy Framework.*
- *The applicant has failed to provide a contribution towards the improvement of services and facilities as a consequence of demands created by the proposed development in respect of construction training, highways matters, air quality monitoring, environmental mitigation (including but not limited to measures to control impacts of activities that would impact on residential amenity) and project management. The proposal therefore conflicts with Policies AM1, AM11 and R17 of the adopted Hillingdon Local Plan Part 2, Saved Policies and policies 4.1, 4.12, 6.7 and 7.1 of the London Plan and the London Borough of Hillingdon Planning Obligations Supplementary Planning Document.*

15 The revised planning application that is the subject of this report has sought to reduce the proposed capacity of the development from 950,000 tonnes per annum to 450,000 tonnes per annum and thereby address Hillingdon Council's four reasons for refusal.

## **Strategic planning issues and relevant policies and guidance**

16 The relevant issues and corresponding policies are as follows:

- |                           |  |
|---------------------------|--|
| • Waste                   | <i>London Plan; the Municipal Waste Management Strategy</i>  |
| • Employment              | <i>London Plan; Land for Industry and Transport SPG</i>  |
| • Urban design            | <i>London Plan</i>   |
| • Inclusive Access        | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i>  |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |
| • Air quality             | <i>London Plan; the Mayor's Air Quality Strategy</i>   |
| • Ambient noise           | <i>London Plan; the Mayor's Ambient Noise Strategy</i>   |

- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hillingdon Local Plan: Part 1 – Strategic policies (2012); the Hillingdon Council Unitary Development Plan saved policies (2007); the West London Waste Plan (2015); and, 2015 the London Plan (Consolidated with Alterations since 2011).

18 The following are also relevant material considerations:

- National Planning Policy Framework and the accompanying National Planning Practice Guidance.
- The draft Minor Alterations to the London Plan (2015).
- The draft Hillingdon Local Plan: Part 2 – Site allocations and designations.

## **Principle of development**

19 The site is located within the Heathrow Opportunity Area. Policy 2.13 'Opportunity Areas and Intensification Areas' and Table A1.1 of the London Plan identifies the Opportunity Area for a minimum of 9,000 new homes and an indicative employment capacity of 12,000 and recognises the importance of maintaining the attractiveness of the area for businesses, while enhancing its environmental performance in line with Policy 6.6 'Aviation'. Any new development and infrastructure brought forward in this area must avoid adverse effects on any European site of nature conservation importance either alone or in combination with other plans and projects. In Hillingdon, Heathrow 'north' will continue to benefit from airport related growth, particularly with regard to transport and logistics, business and hotels and leisure/tourism.

20 The London Plan promotes a rigorous approach to industrial land management to ensure sufficient stock of land and premises is provided to meet the future needs of different types of industry and related uses in different parts of London, including good quality and affordable space. London Plan Policy 4.4 'Managing industrial land and premises' promotes an evidence based approach to reconcile demand and supply of industrial land through three types of location: strategic industrial locations; locally significant industrial sites; and other industrial sites (non-designated).

21 Much of the site is currently vacant, although since the closure of the coal depot in 1990, the site has been used for a range of industrial and storage uses. The proposal would provide the redevelopment of underutilised non-designated industrial land. The redevelopment of the site would improve the quality, efficiency, and increase the industrial capacity of the site, which is supported.

22 The site is designated by the Strategic Rail Authority as a 'Site with Medium Rail Potential which should be retained for rail use on basis of 'precautionary principles''. It has been made clear from the applicant that the site is designated by Network Rail as a 'Nominated Location' within the Track Access Contract agreed between landlord and tenant(s), which requires that any long term occupation and use of the premises must make use of the rail infrastructure and connection onto the national rail network. This designation ensures that any long term tenant of the site must use the premises for activities such as storage, distribution, processing or manufacturing of materials and that the use of rail infrastructure must form part of the transport regime to or from the site to service these types of activities.

23 Although the proposal includes an element of freight use, the applicant needs to set out what discussions it has had with Network Rail and whether Network Rail requires this site for uses other than that proposed by the applicant. This information is needed to assess whether the application complies with London Plan Policy 6.1 facilitating the efficient distribution of freight traffic. The applicant should demonstrate that the import/export by rail is viable and deliverable, and provide evidence where the waste will be coming from/going to.

## Waste

24 A significant amount of waste is transferred outside of London for treatment or disposal. The London Plan aims to ensure that as much of London's waste is managed within London as practicable working towards managing the equivalent of 100% of London's waste within London by 2026. The West London Waste Plan (WLWP) supports the London Plan and endeavours to, over the period to 2031, make provision for enough waste management facilities of the right type and in the right locations to provide for the sustainable management of waste guided by the waste hierarchy to achieve net self-sufficiency and meet the needs of local communities.

25 The London Plan focuses on minimising the level of waste generated, increasing re-use, recycling and composting of waste and generating energy from non-recycled waste in order to divert waste arisings being managed by landfill. London Plan Policy 5.16 'Waste net self-sufficiency' aims for London to better manage its waste in order to achieve both the greatest environmental benefit as well as net self-sufficiency. In particular, Policy 5.16B(e) states that the aim of self-sufficiency will be achieved by exceeding recycling levels in CE&D waste of 95% by 2020. London Plan Policy 5.17 'Waste Capacity' recognises the need to increase waste processing capacity in London and Table 5.2 sets out each borough's waste apportionment and indicates that construction and industrial waste arisings for Hillingdon will reach 362 tonnes per annum by 2036.

26 Policy 5.17 sets out specific criteria that waste management should be evaluated against including locational suitability, proximity to the waste source, nature of activity proposed, achieving high reuse and recycling performance, achieving positive carbon outcomes of waste treatment methods and technologies resulting in greenhouse gas savings, the environmental impact on surrounding areas, full transport and environmental impact of all collection, transfer and disposal movements. The London Plan provides support for developments that include a range of complementary waste facilities on a single site.

27 The proposal has the potential to help boost London's recycling capacity. The applicant is asked to clearly identify any waste going for landfill, including tonnage, and ensure that the receiving area is aware and accepts this.

28 Policy WLWP2 of the West London Waste Plan (WLWP), protects existing sites for continued use for waste management. The Yiewsley Rail Sidings are identified in Appendix 2 of the WLWP as an existing site. Policy WLWP3 of the Plan generally supports waste development proposals on existing waste management, such as this site, provided that the proposals comply with the development plan for the area.

29 Therefore, the principle of waste management development on this site is supported. An assessment of compliance against other relevant London Plan policies is set out in this report. The Council will need to consider the application against the local development plan.

## **Employment**

30 As stated above the site is located within the Heathrow Opportunity Area. The Opportunity Area recognises the range of potential sites to increase the employment capacity in the area. London Plan Policy 4.12 'Improving opportunities for all' aims to support local employment, skills development and training opportunities.

31 The applicant has indicated that during the operation phase the MRRF will provide approximately 130 full time jobs. The application is therefore compliant with London Plan policies and the increased employment on the development site is supported.

## **Urban design**

32 With regards to urban design no strategic issues are raised; the design is driven by the industrial function of the proposals, the site is landlocked and therefore there are no opportunities to improve the wider permeability of the surrounding area. The scale of the development does not raise any concern. GLA officers are of the view that the design the design is appropriate for the type of development.

## **Inclusive access**

33 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

34 The applicant has submitted limited information in relation to inclusive access. Disabled parking bays have been located close to the entrance of the proposed office building and step free access is provided, however further information that demonstrates how the principles of inclusive design, including the specific needs of disabled people have been integrated into the proposed development and how inclusion will be maintained and managed for future workers will need to be supplied before the scheme is referred back at stage two.

35 The design of the public realm is crucial to how inclusive the development is. The pedestrian routes should be designed to ensure full and easy access for all users and details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles, and how any level change on the routes will be addressed should be included in the design and access statement.

## **Air quality**

36 London Plan Policy 7.14 'Improving Air Quality' seeks to achieve reductions in pollutant emissions and minimise public exposure to pollution. The site lies within the Hillingdon Air Quality Management Area (AQMA).

37 The applicant's Environmental Impact Assessment (EIA) states that the proposal will have negligible impact during construction phase. The applicant has assessed the impact of traffic emissions arising from traffic associated with the development and has found this to be negligible. It is intended to employ mitigation measures such as covering waste, site inspections and best practice storage and handling to ensure effects on amenity issues, including odour, litter and dust, are controlled and effects are considered to be negligible. The design of the MRRF building will include fast acting doors to control dust and noise. The unloading area of this building will also be subject to ventilation control measures to control any odour issues.

38 On the basis of the above, the development proposals will not cause a detrimental impact on air quality and the development complies with London Plan Policy 7.14. However, before the scheme is referred back to the Mayor, the Council will need to secure the relevant planning conditions are secured, if it is resolved to grant permission.

## **Noise**

39 London Plan Policy 7.15 relates to reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes. The policy seeks to reduce and manage noise to improve health and quality of life and support the objectives of the Mayor's Ambient Noise Strategy. The applicant has undertaken an assessment of the noise generation.

40 The noise assessment indicates that noise will be generated during the construction phase. Mitigation measures will ensure that the impact is reduced. The applicant's EIA states that the proposal has been designed to reduce adverse noise effects, buildings will be acoustically treated to contain noise and a noise barrier and screening is proposed to protect local residents. The operation of the proposal will mitigate noise impacts by implementing best practice management measures including maintenance of plant and equipment and speed limit restrictions. Plant and equipment will also be required to adhere to specified noise emission limits. The EIA concludes that the operation of the development and noise from road traffic associated with the operation of the development will have negligible effects.

41 Full details of any mitigation measures should be conditioned prior to the application being referred back to the Mayor in order to comply with London Plan Policy 7.15.

## **Sustainable development**

### Energy

42 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO<sub>2</sub>) emissions. Sufficient information has been provided to understand the proposals as a whole.

43 The proposals in the energy assessment are acceptable and no further information is required.

### Energy efficiency standards

44 A range of passive design features and demand reduction measures are proposed to reduce the CO<sub>2</sub> emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include natural ventilation, passive infrared occupancy detection controls and energy efficient lighting.

45 The demand for cooling will be avoided through the use of shading features and solar control glass. The welfare building will be naturally ventilated and no mechanical cooling is proposed for the MRRF building.

46 In this development a proportionally high element of unregulated energy use occurs due to, for example, the motors driving the separators and conveyor belt system. The unregulated energy use will be minimised through the energy efficient design of the waste processing plant, including daylight linked lighting controls.

47 The development is estimated to achieve a reduction of 1 tonne per annum (5%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development, as shown in the table below. Energy efficiency measures targeted at the substantial unregulated emissions are also envisaged to result in a reduction of 1 tonnes of CO<sub>2</sub> per annum.

#### District heating

48 The applicant has carried out an investigation and there are no district heating networks in the vicinity of the development.

49 The main MRRF is unheated. Given the relatively small and intermittent demand for heat in the welfare building, on-site CHP is not proposed. This is accepted in this instance.

50 No energy generation is proposed for this facility, so there is no potential to export heat.

#### Renewable energy technologies

51 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 270kWp of Photovoltaic (PV) panels on the roof of the building. A roof layout drawing has been provided. Additionally, a 15kW ground source heat pump is proposed to meet the small heat demands of the welfare building.

52 A reduction in CO<sub>2</sub> emissions of 121 tonnes per annum will be achieved through this third element of the energy hierarchy.

#### Overall carbon savings

53 Based on the energy assessment submitted at stage I, the table below shows the residual CO<sub>2</sub> emissions after each stage of the energy hierarchy and the CO<sub>2</sub> emission reductions at each stage of the energy hierarchy.

	<b>Total residual regulated CO<sub>2</sub> emissions</b>	<b>Regulated CO<sub>2</sub> emissions reductions</b>	
		<b>(tonnes per annum)</b>	<b>(per cent)</b>
Baseline i.e. 2013 Building regulations	15		
Energy Efficiency	15	1	5%
CHP	15	0	0%
Renewable energy	-106	121	>100%
<b>Total</b>		121	>100%

54 A reduction of 121 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected.

55 The regulated CO<sub>2</sub> savings are greater than 100% and, hence significantly exceed the targets set within Policy 5.2 of the London Plan.

## Flood risk

56 The Flood Risk Assessment (FRA) prepared by Cannon Consulting Engineers confirms that this 5.6 hectare elevated site is located within Flood Zone 1, but parts of the nearby catchment (adjacent to the northern boundary) are within Flood Zone 3. Fray's River runs close to the eastern boundary of the proposed development.

57 The proposals are acceptable in terms of London Plan Policy 5.12 'Flood risk management'.

## Sustainable drainage

58 Environment Agency mapping reveals that small areas of the site are at risk of surface water flooding. In addition, parts of the wider catchment (e.g. north of the proposed development site) are also at risk of surface water flooding. As a result, the application of London Plan Policy 5.13 'Sustainable drainage' will be particularly important.

59 Surface water runoff generated at the site (which is 89% impermeable) is currently discharged into Fray's River. The FRA proposes to continue to discharge surface water to Fray's River.

60 The area of impermeable surface will increase slightly (by 0.2 hectares) and the FRA proposes a 50% reduction of the current runoff rate to a maximum of 55 l/s/ha for all storms up to and including the 1 in 100 annual probability storm (+30%). This will be achieved by:

- Filtering roof run-off before storage underground: the water will be used for the site's dust suppression systems
- Filtering hard-standing runoff through a vegetated filter drain/linear bio-retention feature prior to storage in oversized pipes
- Disposing of runoff from the outside storage and processing area via the foul water sewer (improving the quality of the discharge into Fray's River)

61 The FRA states that for particularly large or intense storms (beyond the usual drainage assessment parameters), flows would tend to be managed by a combination of temporary storage within the proposed soft landscaping in the east of the site, and overland shallow sheet flow towards the river.

62 The proposed SuDS measures are welcome, particularly the bio-retention strip and rainwater harvesting). The proposed measures, and the proposed Design for Exceedance within the soft landscaping measure for intense storms, should be secured via an appropriate planning condition.

63 However, no reasons have been given for not incorporating green roofs, in line with the SuDS hierarchy in London Plan Policy 5.13 (these would also reduce the need for underground storage). In addition, water storage in the landscaping (for the hard-standing runoff, after filtering through the vegetated filter drain) could have been explored. Justification for these decisions should be provided prior to any stage 2 referral, particularly given the relatively high discharge rate proposed (55 l/s).

## Climate change adaptation

64 Hillingdon Council should secure through planning condition that the application responds to strategic policies regarding climate change adaptation, including use of low energy lighting and energy efficient appliances, metering, high levels of insulation, low water use sanitary-ware and fittings, in addition to biodiverse roofs.

## Transport

65 As stated previously, the proposal was subject to an earlier planning application, which was refused in December 2013 by Hillingdon Council. One of the reasons for refusal was that the transport assessment submitted at the time was considered to be inadequate and failed to demonstrate that the proposal would not result in any significant adverse impact to the local highway network.

66 The 2015 proposal is physically similar to the 2013 proposal; however, the volume of the proposed imported waste materials has been reduced to 450,000 tonnes from 950,000 tonnes as previously proposed, albeit the facilities remain of a similar size.

67 In order to address concerns raised by TfL and Hillingdon Council, the applicant has included up-dated survey details for the existing situation at 2014 taken as a baseline assessment; and trip generation information for existing materials recycling facility and civic amenity site at Old Oak Sidings in Willesden for assessment of the proposed scenario.

68 Based on the latest estimate, the proposal will generate a total of 54 two way vehicle trips in the AM peaks and 101 in the PM peaks; this includes 16 HGV trips for the both the AM and PM peaks. The estimated trip generations indicates an increase of two trips in the AM peaks and 49 trips in the PM peaks compared with the 2014 baseline scenario.

69 The transport assessment acknowledged through swept path analysis, while HGVs might be able to tightly manoeuvre the mini roundabout junction at the High Street/Tavistock Road junction; pantechon and 16.5T articulated goods vehicles heading north along the High Street will have to give way to buses travelling west on Horton Road due to a tight corner. TfL therefore remains concerned by the potential risk of conflict with bus movements and other local traffic and pedestrians and cyclists accessing the station. In addition, and despite TfL's previous request, the applicant has still yet to identify an acceptable contingency or alternative route to the one proposed. TfL therefore request that details of another suggested route be provided for consideration prior to the determination of the proposal. TfL would also stress to the applicant that the main corridor linking West Drayton to Uxbridge has been identified as one of the most heavily congested local highway sections at peak hours, therefore it would not be expected to be identified as an alternative route.

70 It is proposed that a total of 33 car parking spaces will be provided for staff and visitors, which includes two disabled spaces, this is supported by TfL. Six spaces will be provided with electric vehicle charging points (EVCP) with a further three with passive electrical vehicle charging points. This is in line with London Plan Policy 6.9.

71 TfL also recommends that a car parking management plan is developed for the site and is secured by condition. Included in this should be the monitoring of the use of EVCPs and disabled bays.

72 TfL notes that footway condition between Tavistock Road and High Street is poor, and the applicant has also acknowledged that the internal access road from Tavistock Road was not considered suitable for pedestrians. To address this, the applicant has proposed to provide a shuttle service to transport staff between the site and West Drayton station; however TfL considers this not to be attractive and feasible due to the lack of standing place at West Drayton station. Instead, TfL requests that the application make improvement to the access route to enable pedestrian access to the site safely, in line with London Plan Policy 6.10 and should be secured via condition by Hillingdon Council.

73 A total of eleven cycle parking stands will be provided, which represents 15% of the staff expected on site at any time. TfL requests that cycle parking usage be monitored as part of the travel plan measures and that additional spaces be provided if needed.

74 Regarding the use of rail, the applicant states that approximately five to six trains per week are expected to transport 120,000 tonnes of materials to/from the site. Notwithstanding this, the release of the site by Network Rail imposes an obligation on the applicant to use a minimum of railhead. The applicant is therefore expected to demonstrate that rail use will be maximised for this site. Furthermore, the applicant has also yet to demonstrate that the required train path has been secured. Therefore, concerns remain that in the case of the access path potentially being refused by Network Rail, the site cannot be served by rail with the consequential increase of vehicular movement to and from site. TfL therefore requests that sensitivity test of all freight traffic arriving to the site by road be provided. In addition and in accordance with London Plan Policy 6.14, a Grampian condition is requested to ensure that the refurbishment and extension of existing rail sidings is completed prior to the commencement of the use of the site. In addition, TfL would encourage Hillingdon Council to impose a maximum capped volume of materials to be transported by road of not more than 330,000 tonnes per annum by way of planning obligation or condition, to prevent potential increase in HGV traffic beyond the current estimated level and in the case of rail freight being unable/ceased to serve the site for any reasons. The Council shall subsequently secure financial contribution from the applicant toward undertaking the necessary monitoring mechanism for this purpose.

75 A Delivery Management Plan (DMP) has been included which is welcomed by TfL. However, before the document can be considered satisfactory and in line with London Plan Policy 6.14, additional information on the rationalisation of the HGV movements through the peak periods and the maximisation of rail freight, as referred above, will need to be included. Furthermore, TfL would have expected a construction and logistics plan (CLP) to have been provided in support of this application. This is particularly relevant given the use of the site and to be consistent with London Plan Policy 6.14, a CLP would need to be submitted to the Council for their review prior to determination.

76 A workplace travel plan has been submitted, regrettably, it has failed the ATTrBuTE travel plan assessment, citing insufficient mode share details. Once the content of the Travel Plan has been reviewed in accordance with ATTrBuTE and deemed acceptable, the Council should secure, enforce, monitor, review and ensure the funding of the Travel Plan through the section 106 agreement to ensure conformity with London Plan Policy 6.3.

78 In accordance with London Plan Policy 8.3, 'Community Infrastructure Levy', and following consultation on both a Preliminary Draft, and then a Draft Charging Schedule, the Mayor's CIL came into effect on 1 April 2012. The proposed development is within the London Borough of Hillingdon where the Mayoral charge is £35 per square metre gross internal area.

## **Local planning authority's position**

79 It is understood by GLA officers that Hillingdon Council is likely to present the application to their planning committee in March 2016.

## Legal considerations

80 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

81 There are no financial considerations at this stage.

## Conclusion

82 London Plan policies on principle of development, waste, employment, urban design, inclusive access, air quality, noise, sustainable development and transport are relevant to this application. In general the scheme is supported in strategic planning terms. However, further information and discussion, as stated below, is required to ensure the proposal complies with the London Plan:

- **Principle of development:** The development proposals have significant potential to support and capture the benefits of waste recycling, contribute to the Mayor's recycling level targets, while delivering the Mayor's waste policy, and therefore, are supported in principle. The Council should confirm that the location of the site is appropriate given that it is not identified in the WLWP as an additional site for waste management. The applicant is asked to clearly identify any waste going for landfill, including tonnage, and ensure that the receiving area is aware and accepts this. Further details should also be supplied regarding the Network Rail requirements for the site.
- **Employment:** The application is compliant with London Plan policies and the increased employment on the development site is supported.
- **Urban design:** The proposed design is generally accepted and in line with policies contained in Chapter 7 of the London Plan.
- **Inclusive access:** Further details of how inclusive access has been considered with regards to the areas of public realm should be provided to ensure compliance with London Plan Policy 7.2.
- **Air quality:** Prior to the application being referred back to the Mayor, relevant planning conditions will need to be secured to ensure the proposal complies with London Plan Policy 7.14.
- **Noise:** Prior to the application being referred back to the Mayor, relevant planning conditions will need to be secured to ensure the proposal complies with London Plan Policy 7.15.

- **Sustainable development:** The proposals in the energy assessment are acceptable and no further information is required. The proposals are acceptable in terms of London Plan Policy 5.12 'Flood risk management'. Further justification is required regarding the sustainable drainage strategy prior to the application being referred back to the Mayor. Hillingdon Council should secure through planning condition that the application responds to strategic policies regarding climate change adaptation.
- **Transport:** Further information and discussion, outlined in the body of this report, is required before the proposal can be considered acceptable and this should be addressed prior to the application being referred back to the Mayor.

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