



HILLINGDON  
LONDON



# Major Applications Planning Committee

## To Councillors on the Committee

Councillor Steve Tuckwell (Chairman)  
Councillor Henry Higgins (Vice-Chairman)  
Councillor Adam Bennett  
Councillor Darran Davies  
Councillor Jas Dhot  
Councillor Elizabeth Garelick  
Councillor Tony Gill

**Date:** WEDNESDAY, 22  
FEBRUARY 2023

**Time:** 7.00 PM

**Venue:** COMMITTEE ROOM 5 -  
CIVIC CENTRE

**Meeting Details:** Members of the Public and Media are welcome to attend. This meeting may also be broadcast live.

This Agenda is available online at:  
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**Published:** Tuesday 14 February 2023

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Putting our residents first

Lloyd White  
Head of Democratic Services  
London Borough of Hillingdon,  
Phase II, Civic Centre, High Street, Uxbridge, UB8 1UW

# Useful information for residents and visitors

## *Watching & recording this meeting*

You can watch the public part of this meeting on the Council's YouTube channel, live or archived after the meeting. Residents and the media are also welcome to attend in person, and if they wish, report on the public part of the meeting. Any individual or organisation may record or film proceedings as long as it does not disrupt proceedings.

It is recommended to give advance notice of filming to ensure any particular requirements can be met. The Council will provide seating areas for residents/public, high speed WiFi access to all attending and an area for the media to report. The officer shown on the front of this agenda should be contacted for further information and will be available to assist.

When present in the room, silent mode should be enabled for all mobile devices.

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Please enter via main reception and visit the security desk to sign-in and collect a visitors pass. You will then be directed to the Committee Room.

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Those attending should be aware that the Council will film and record proceedings for both official record and resident digital engagement in democracy.



# A useful guide for those attending Planning Committees

## Petitions, Speaking and Councillors

**Petitions** – Those who have organised a petition of 20 or more people who live in the Borough, can speak at a Planning Committee in support of or against an application. Petitions must be submitted in writing to the Council in advance of the meeting. Where there is a petition opposing a planning application there is also the right for the applicant or their agent to address the meeting for up to 5 minutes. The Chairman may vary speaking rights if there are multiple petitions

**Ward Councillors** – There is a right for local councillors to speak at Planning Committees about applications in their Ward.

**Committee Members** – The planning committee is made up of the experienced Councillors who meet in public every three weeks to make decisions on applications.

## How the meeting works

The Planning Committees consider the more complex or controversial proposals for development and also enforcement action.

Applications for smaller developments such as householder extensions are generally dealt with by the Council's planning officers under delegated powers.

An agenda is prepared for each meeting, which comprises reports on each application

Reports with petitions will normally be taken at the beginning of the meeting.

The procedure will be as follows:-

1. The Chairman will announce the report;
2. The Planning Officer will introduce it; with a presentation of plans and photographs;
3. If there is a petition(s), the petition organiser will speak, followed by the agent/applicant followed by any Ward Councillors;
4. The Committee may ask questions of the petition organiser or of the agent/applicant;
5. The Committee discuss the item and may seek clarification from officers;
6. The Committee will vote on the recommendation in the report, or on an alternative recommendation put forward by a Member of the Committee, which has been seconded.

## How the Committee makes decisions

The Committee must make its decisions by having regard to legislation, policies laid down by National Government, by the Greater London Authority – under 'The London Plan' and Hillingdon's own planning policies. The Committee must also make its decision based on material planning considerations and case law and material presented to it at the meeting in the officer's report and any representations received.

Guidance on how Members of the Committee must conduct themselves when dealing with planning matters and when making their decisions is contained in the 'Planning Code of Conduct', which is part of the Council's Constitution.

When making their decision, the Committee cannot take into account issues which are not planning considerations such as the effect of a development upon the value of surrounding properties, nor the loss of a view (which in itself is not sufficient ground for refusal of permission), nor a subjective opinion relating to the design of the property. When making a decision to refuse an application, the Committee will be asked to provide detailed reasons for refusal based on material planning considerations.

If a decision is made to refuse an application, the applicant has the right of appeal against the decision. A Planning Inspector appointed by the Government will then consider the appeal. There is no third party right of appeal, although a third party can apply to the High Court for Judicial Review, which must be done within 3 months of the date of the decision.

# Agenda

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## CHAIRMAN'S ANNOUNCEMENTS

- 1 Apologies for Absence
- 2 Declarations of Interest in matters coming before this meeting
- 3 To sign and receive the minutes of the previous meeting 1 - 8
- 4 Matters that have been notified in advance or urgent
- 5 To confirm that the items marked in Part 1 will be considered in public and those items marked in Part 2 will be heard in private

## PART I - Members, Public and Press

### Major Applications without Speaking Rights

	Address	Ward	Description & Recommendation	Page
6	Land East of Mons 585/APP/2022/665	Hillingdon West	Reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19 (Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works).  <b>Recommendations: Approval</b>	9 – 58 124 – 135

7	Shurgard House 49467/APP/2022/2801	Belmore	<p>Partial demolition and extension to existing building to provide additional self-storage floorspace (Use Class B8) with associated new car and cycle parking, refuse storage, landscaping and other associated works ancillary to the development.</p> <p><b>Recommendations: Approval</b></p>	59 – 104 136 – 157
8	Woodlands Park Landfill Site, Land South of Slough Road 39707/APP/2022/3243		<p>Out of Borough consultation for Buckinghamshire County Council: Outline planning application with all matters reserved except for principal points of access for the redevelopment of the former landfill site to comprise a data centre development (Use Class B8 (Data Centre)) of up to 163,000 sq.m (GEA) delivered across 3 buildings to include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. The scheme includes site wide landscaping and the creation of parkland, and may also include cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, District Heating Network, sustainable drainage systems, ancillary infrastructure and a substation.</p> <p><b>Recommendations: Objection</b></p>	105 – 122 158 – 165

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## Minutes



**MAJOR Applications Planning Committee**

**18 January 2023**

**Meeting held at Committee Room 5 - Civic Centre**

	<p><b>Committee Members Present:</b>  Councillors Henry Higgins (Vice-Chairman, in the Chair)  Adam Bennett  Philip Corthorne  Darran Davies  Jas Dhot  Elizabeth Garelick  Tony Gill</p> <p><b>Ward Councillors Present:</b>  Councillors Roy Chamdal  Ekta Gohil</p> <p><b>LBH Officers Present:</b>  Mandip Malhotra (Strategic and Major Applications Manager)  Julia Johnson (Director of Planning, Regeneration and Public Realm)  Alan Tilly (Transport Planning and Development Manager)  Glen Egan (Office Managing Partner - Legal Services)  Ian Thynne (Planning Specialist Team Manager)  Andrew Thornley (Principal Planning Officer)  Ed Laughton (Principal Planning Officer)  Steve Clarke (Democratic Services Officer)  Ryan Dell (Democratic Services Officer)</p>
179.	<p><b>APOLOGIES FOR ABSENCE</b> (<i>Agenda Item 2</i>)</p> <p>Apologies for absence were received from Councillor Steve Tuckwell with Councillor Philip Corthorne substituting.</p>
180.	<p><b>DECLARATIONS OF INTEREST IN MATTERS COMING BEFORE THIS MEETING</b>  (<i>Agenda Item 3</i>)</p> <p>None.</p>
181.	<p><b>TO SIGN AND RECEIVE THE MINUTES OF THE PREVIOUS MEETING</b> (<i>Agenda Item 4</i>)</p>
182.	<p><b>MATTERS THAT HAVE BEEN NOTIFIED IN ADVANCE OR URGENT</b> (<i>Agenda Item 5</i>)</p>
183.	<p><b>TO CONFIRM THAT THE ITEMS MARKED IN PART 1 WILL BE CONSIDERED</b></p>

**INPUBLIC AND THOSE ITEMS MARKED IN PART 2 WILL BE HEARD IN PRIVATE**  
(Agenda Item 6)

184. **HILLINGDON HOSPITAL, PIELD HEATH ROAD, HILLINGDON - 4058/APP/2022/1788** (Agenda Item 7)

**Hybrid planning application for: FULL application seeking planning permission for demolition of existing buildings (excluding the Tudor Centre and the Old Creche) and redevelopment of the site to provide the new Hillingdon Hospital (Use Class C2), multi-storey car park and mobility hub, vehicle access, highways works, associated plant, generators, substation, new internal roads, landscaping and public open space, utilities, servicing area, surface car park/ expansion space, and other works incidental to the proposed development; and OUTLINE planning application (all matters reserved, except for access) for the demolition of buildings and structures on the remaining site (excluding the Grade II Listed Furze) for a mixed-use development comprising residential (Class C3) and supporting Commercial, Business and Service uses (Class E), new pedestrian and vehicular access; public realm, amenity space, car and cycling parking.**

Officers introduced the application and delivered a detailed presentation outlining the proposals and the Committee report.

Subsequently, Members' attention was drawn to the addendum where an amendment to Heads of Term number 13 was proposed to show on-site affordable housing levels of 50% rather than the 54% indicated in the report, in addition to this a verbal update was given to Heads of Term 13 in that the 70% figure should be for social rent and 30% for intermediate and shared ownership. A further verbal update was given to add an informative to seek best endeavours to accommodate key workers within the affordable housing delivery; it was noted that this was not something that the local planning authority could currently mandate.

It was also highlighted that the new hospital was proposed to achieve a 31% carbon reduction, which was below the 35% required, this had resulted in a large carbon offset contribution of £4.5m was included within the Heads of Term. It was proposed that the Trust would be given the opportunity at the detailed design stage to improve the carbon offset further; it was also proposed that the Trust would be given the opportunity to use the carbon offset contribution to make energy efficiencies within their own buildings. The addendum proposed an amendment to Heads of Term number 8 to ensure that those efficiencies would be achieved either on-site or at an equivalent scheme for another NHS site within Hillingdon. A verbal update was given in that the addendum should read £95/tonne rather than £90/tonne, it was noted that when the section 106 agreement was to be drafted, the correct sum would be captured.

Through the addendum officers proposed the addition of a new informative in that, during scheduled maintenance of the back up electricity supply generators, the applicant would be advised to consider the opportunity for redistribution of the power generated to alternative users and/or National Grid where feasible.

Additionally, officers proposed an amendment to condition 28 to ensure that all ambulance parking was to have active electric vehicle charging provision.

Officers noted that in response to the public consultation carried out with circa 3913 local residents, the proposals advertised in the local press, and site notices posted on

site, only 24 public comments had been received, with 10 in support, 8 in objection, and 6 that were deemed to be neutral.

Councillor Roy Chamdal was in attendance and addressed the Committee as Ward Councillor for Colham & Cowley. Key points raised in their address included:

- The redevelopment of Hillingdon Hospital was welcomed and was considered well overdue.
- The proposals were praised for the detail and quality of the development.
- It was highlighted that the proposals would have a significant visual impact on neighbouring residents.
- There were existing issues around parking within the vicinity and surrounding areas of the hospital and concerns were raised regarding the 161 parking spaces that could potentially be lost in future if the hospital were to develop further. Additionally, concerns were raised regarding parking and the 327 residential units that were proposed. The Ward Councillor sought to ensure that, once the new development was in operation, parking pressures were appropriately mitigated.
- Another existing issue pertained to traffic congestion around access to the hospital, specifically in Pield Heath Road. The Ward Councillor welcomed the bus routes that would directly serve the site as a way of reducing congestion pressures and sought to ensure that traffic could flow through the site would be appropriately maintained.
- Surface water drainage was raised as an existing issue and the Ward Councillor sought to see betterment of the current situation within the new development.
- The Ward Councillor also requested that a mechanism be put in place for local residents to speak to someone, should there be an issue with the development.

Councillor Ekta Gohil was in attendance and addressed the Committee as Ward Councillor for Colham & Cowley. Key points raised in their address included:

- Officers were thanked for their extensive hard work in putting bringing the application to Committee for determination.
- Hillingdon Hospital was highlighted as the heart of the Borough and its redevelopment was entirely welcomed.
- The Ward Councillor was pleased to see that the report had effectively mitigated their previous concerns with regard to surface water drainage, particularly on Pield Heath Road which was currently prone to flooding, and noise levels emanating from the site.
- The report had noted that it was assumed that the buses running through the site would be electric vehicles (EVs) or hydrogen powered EVs. The Ward Councillor requested whether it would possible to explore conditioning this to ensure that it was the case.
- The Ward Councillor was also pleased to see the proposed addendum point ensuring that the carbon offset funds would be used within Hillingdon.

The Member of Parliament for Uxbridge & South Ruislip, Boris Johnson, had submitted a written statement that had been circulated to the Committee and was read at the meeting. Key points included:

- Hillingdon Hospital was no longer fit for purpose and required modernisation to drive excellence in patient care. It was therefore deemed vital that the application was granted planning permission to redevelop the ageing site.

- There was full support from local stakeholders, including the North West London Integrated Care Board, the North West London Acute Collaborative, and NHS London.
- The development would implement modern methods of construction which adopted standard, repeatable and interoperable designs, enabling offsite manufacture and efficient processes to deliver better outcomes and manage costs.
- It was also welcome that the proposed layout of the new hospital will provide significantly more floor space in comparison to the current site.
- There was a real urgency to progress the development as 80% of the present site required replacement soon or was considered inoperable – this had a detrimental impact on patient safety and experience, staff recruitment and the financial position of the Trust.

The Committee were supportive of the development, noting that it was much needed and would bring immense benefits to residents of the Borough and beyond. Members highlighted that the scale of the development would inevitably result in a visual impact upon neighbours which was unavoidable, but it was noted that these factors had been mitigated somewhat through the design process. The Committee highlighted that perhaps the relatively small number of responses to the public consultation was indicative of recognition that residents feel that there is an inevitable need for the redevelopment of Hillingdon Hospital.

Officers noted that the local planning authority had received information regarding the temporary arrangements for staff and visitor parking during construction in that, there would be 322 spaces remaining available on the hospital site, the Trust would also move some services over to Mount Vernon hospital during construction where there would be a further 127 parking spaces available. The residential phase of development would have a maximum of 0.75 parking spaces per unit. Officers confirmed that they had not yet received a finalised plan regarding the temporary arrangements for staff and visitor parking during construction, however Members were reassured that Heads of Term number 2 secured that construction would not start until this plan was in place ensuring adequate car parking availability.

Highways officers confirmed that public travel needs would be satisfied by the proposed mobility hub, the new bus service serving the site, the Santander cycle hire facilities, and an abundance of cycle parking; the Highways authority were also confident that the travel capacity and car parking numbers would cope with future demand from hospital staff and visitors. Members sought to improve public transport capacity going to and from the site once the new hospital was operational, suggesting that some of the bus routes could adopt double decker buses rather than the single deck buses currently seen for example on the U1 route. Officers confirmed that TfL would be driven by demand and the anticipated increase in demand for transport to the new hospital should facilitate TfL increasing capacity, the Committee sought to add an informative seeking improvements to bus capacity and routing. Officers also commented that they would intend on working with TfL to potentially brand buses serving the new Hillingdon Hospital to advertise that certain routes would be regularly serving the hospital.

With regard to surface water drainage which currently caused flooding issues on and around the site, officers noted that they had extensively worked with the developers in securing betterment for the site in both the hospital phase and the residential phase of development; namely that the area of hardstanding had been heavily reduced and the

ability of the site to absorb surface water will be significantly improved from its current standpoint. Members were encouraged that there would be an improved situation with regard to flood risk for neighbouring residents.

With regard to Councillor Chamdal's request for residents to be able to raise any issues during construction, officers highlighted that there was a Construction Environmental Management Plan which would seek to provide contact details for someone that residents can go to should they have any grievances and complaints.

Regarding Councillor Gohil's request that the Committee condition the need for buses running through the site to be EVs, it was noted that Transport for London's (TfL) 2034 strategy was to ensure that the entire TfL bus fleet would be EVs, officers advised that it would not be necessary for the Committee to mandate this.

On matters of pedestrian safety and accessibility, officers noted that as the healthy streets contribution is spent, it would be done so in consultation with the Council's Principal Accessibility Officer who would offer expert advice on the provision of appropriate accessibility levels.

The Committee sought assurances that HGVs accessing the site would not burden local roads and increase congestion around the site which had been noted as a concern by the Ward Councillors. Officers informed Members that the Construction Environmental Management Plan would secure the routing of HGVs and the hours of delivery to the site which would take account of the capacity of local roads and mitigate the impact on local residents. Members sought to also add wheel washing as a criteria to proposed condition 14 regarding the Construction Environmental Management Plan.

Members raised concerns that the noise emanating from the site could pose an impact on the children attending the nearby special educational needs school on Royal Lane. The Committee sought to add an informative ensuring that the hospital would consult with the school on the Construction Environmental Management Plan and the hours of operation.

The officers recommendation, inclusive of the amendments listed in the addendum, the verbal updates given by officers, and the changes discussed by the Committee, were moved, seconded, and when put to a vote, unanimously agreed.

**RESOLVED:**

- 1) That the application be approved as per the officers recommendation and the amendments listed in the addendum;**
- 2) That an amendment be made to Heads of Term number 13 to read 70% social rent and 30% shared ownership;**
- 3) That an informative be added to encourage the proposed affordable housing to be provided to key workers;**
- 4) That condition 28 be amended to ensure all ambulance parking is to be served by active electric vehicle charging capabilities;**
- 5) That and amendment be made to Heads of Term number 8 to read £95/tonne;**

- 6) That an informative be added to seek improvements to bus capacity and routing frequency to be responsive to demand;
- 7) That condition 14 be updated to include wheel washing as a criterion;
- 8) That an informative be added to request that Meadow School are consulted upon the Construction Environmental Management Plan ahead of its submission to the local planning authority.

185. **GRANGEWOOD SCHOOL, FORE STREET, EASTCOTE, PINNER - 2145/APP/2022/3534** (*Agenda Item 8*)

**Demolition of existing school building and construction of part one storey, part two storey Special Education Needs and Disability School (SEND) (Use Class F), together with associated landscaping, play space, access, refuse and recycling storage, car and cycle parking and associated works.**

The application was presented by officers, who noted the addendum which referenced an amendment to Condition 12 – that a Parking Design and Management Plan shall be submitted prior to any ground works excluding demolition for the development.

Members questioned how the ‘bio-diversity net gain’ referenced in the report would be measured. Officers clarified that the bio-diversity net gain calculator was currently in its draft form and that the London Plan ensured bio-diversity net gain through the Urban Greening Factor but noted that this did not apply to schools. Officers further clarified that trees would be removed but would be replaced on a 1:1 basis. A verbal update was then given to Condition 17 to amend the condition from ‘at least a 1:1 basis’ to ‘more than a 1:1 basis’. Further to this, Members questioned if the Committee could include a condition that the replacement trees be mature trees, to which officers clarified that as mature trees were more susceptible to early failure, higher numbers would have to be planted to offset this. Based on this, officers clarified that mature trees would usually not be planted as they often also required more maintenance. Members questioned the possibility of protecting the newly planted trees and officers clarified that the Landscape Plan was required to be held in perpetuity and so any failed trees would have to be replaced.

Members referenced the Scheduled Ancient Monument noted within the report, and Historic England having had some concerns regarding a fence and questioned why these concerns were not listed as a sustainable objection to the application. Officers noted that the fence in question would be replaced by the applicant, and that there was a condition that the applicant use the same fence poles to avoid underground disturbance.

Members referenced report section 7.08 – Impact on neighbours, which stated a minimum separation distance requirement of 21 meters between facing habitable room windows of habitable rooms. Officers clarified that in this case the separation distance was significantly further than 21 meters (88 meters), but that this normally does not apply to schools and applied to residential properties.

Members questioned the construction management plan and referenced wheel washing and access times. Officers gave a verbal update to Condition 3 – to add a consultation with the headteacher; to add wheel washing to this condition; and to

	<p>control hours of operation. Also, a new management plan was added to secure staggered pick up and drop off from the site.</p> <p>A further verbal update was given to amend Condition 8 to refer to 2021 regulations.</p> <p>Officer's recommendation was moved, seconded and, when put to a vote, unanimously approved with the amended conditions.</p> <p><b>RESOLVED: That the application be approved subject to the amended conditions</b></p>
186.	<p><b>UNIT 6 &amp; 7 ORBITAL INDUSTRIAL ESTATE, HORTON ROAD, YIEWSLEY - 72906/APP/2022/2555</b> (<i>Agenda Item 9</i>)</p> <p><b>Change of use of Units 6 and 7 from Class E(g)(iii) to flexible Use Classes E(g)(ii-iii)/B2/B8.</b></p> <p>The application was introduced by officers. A verbal update was given as an amendment to the Site Location Plan Condition 2 to delete "Site Location Plan 29.07.22" and replace with "Site Location Plan 13.01.23".</p> <p>Officer's recommendation was moved, seconded and, when put to a vote approved.</p> <p><b>RESOLVED: That the application be approved.</b></p>
187.	<p><b>WEST DRAYTON LEISURE CENTRE, HARMONDSWORTH ROAD / ROWLHEYS PLACE, WEST DRAYTON - 75127/APP/2022/2395</b> (<i>Agenda Item 10</i>)</p> <p><b>Minor material amendment application (S73) to amend condition 3 of planning consent reference 75127/APP/2019/3221 dated 27-04-2020 (Redevelopment of site including demolition of existing buildings (Use Class D1) to provide a part 2, part 3 storey building including a basement to provide a leisure centre (Use Class D2) with access, car parking (including a decked car park), landscaping and associated work). AMENDED PLANS 02/12/22</b></p> <p><b>The amendments include the replacement of the arboricultural survey to confirm the trees to be removed, retained and new trees to be planted.</b></p> <p>The application was introduced by officers, and reference was made to the addendum, which noted that Condition 36 was amended to be an 'Informative'. Reference was also given to an amendment to Condition 7 where four additional trees would be planted within the vicinity of the site within 12 months.</p> <p>Officer's recommendation was moved, seconded and, when put to a vote approved with amended conditions.</p> <p><b>RESOLVED: That the application be approved subject to the amended conditions.</b></p>
188.	<p><b>UNIT 3, CLAYFIELD WAY, WEST DRAYTON - 77241/APP/2022/1407</b> (<i>Agenda Item 11</i>)</p> <p><b>Full planning application for proposed attached tiered gantry structure to Unit 3 (LON 7) to provide plant and 4 no. Generators.</b></p>

	<p>The application was introduced by officers. It was noted that the siting of the extension would replace 40 car parking spaces, taking the total down to 100 spaces. It was noted that there was an addendum on this item, with amendments to Condition 2 (a red line inconsistency correction, no change in the proposals) and Condition 3 (08914/3/1/4 External Plant Assessment, date amended from 23rd March 2022 to 10th January 2023). Also, an 'Informative' was added to see whether the scheduled maintenance of back-up generators could be considered for re-distribution into the National Grid where feasible.</p> <p>Officer's recommendation was moved, seconded and, when put to a vote, unanimously approved with the amended conditions.</p> <p><b>RESOLVED: That the application be approved subject to the amended conditions.</b></p>
	<p>The meeting, which commenced at 7.00 pm, closed at 8.27 pm.</p>

These are the minutes of the above meeting. For more information on any of the resolutions please contact Democratic Services on 01895 250636 or email (recommended): [democratic@hillington.gov.uk](mailto:democratic@hillington.gov.uk). Circulation of these minutes is to Councillors, Officers, the Press and Members of the Public.

**The public part of this meeting was filmed live on the Council's YouTube Channel to increase transparency in decision-making, however these minutes remain the official and definitive record of proceedings.**

## Report of the Interim Director of Planning, Regeneration & Public Realm

<b>Address</b>	LAND EAST OF MONS BARRACK ST ANDREWS PARK HILLINGDON ROAD UXBRIDGE
<b>Development:</b>	Reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19 (Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works).
<b>LBH Ref Nos:</b>	585/APP/2022/665
<b>Drawing Nos:</b>	LEO-BDP-ZZ-00-DR-A-PL-1210 Rev P09 LEO-BDP-ZZ-00-DR-A-PL-1211 Rev P13 LEO-BDP-ZZ-ZZ-DR-A-PL-1415 Rev P03 LEO-BDP-ZZ-00-DR-A-PL-1220 Rev P01 Proposed Plan Level LC Indicative Location of Additional Accessible Parking Bays LEO-BDP-ZZ-02-DR-A-PL-1213 Rev P07 LEO-BDP-ZZ-01-DR-A-PL-1212 Rev P07 LEO-BDP-ZZ-ZZ-DR-A-PL-1417 Rev P03 LEO-BDP-ZZ-ZZ-DR-A-PL-1418 Rev P02 26th April 2022 CO2 Emissions Calculations AF2674 Issue 01 3rd March 2022 Fire Statement Report September 2022 Planning Statement Addendum 24th November 2022 LEOMB Internal Daylight Sunlight Addendum Report 5105977 03/03/22 Transport Addendum Note Covering Letter dated 4th March 2022 LEO-BDP-ZZ-ZZ-DR-A-PL-1416 Rev P04 LEO-BDP-ZZ-ZZ-DR-A-PL-1414 Rev P04 March 2022 Rev 01 Reserved Matters Planning Statement 3002349-BDP-ZZ-XX-RP-A-0001-06 Rev 01 LEO-BDP-ZZ-03-DR-A-PL-1214 Rev P07 LEO-BDP-ZZ-ZZ-DR-A-PL-1412 Rev P03 LEO-BDP-ZZ-ELE-DR-A-PL-1271 Rev P02 LEO-BDP-ZZ-ELE-DR-A-PL-1272 Rev P02 LEO-BDP-ZZ-ELE-DR-A-PL-1273 Rev P02 LEO-BDP-ZZ-ELE-DR-A-PL-1170 Rev P06 LEO-BDP-ZZ-ELE-DR-A-PL-1171 Rev P07 LEO-BDP-ZZ-ELE-DR-A-PL-1270 Rev P04 LEO-BDP-ZZ-ELE-DR-A-PL-1274 Rev P04 LEO-BDP-ZZ-ELE-DR-A-PL-1275 Rev P04 400101-BDP-16-00-DR-A-2011 Rev B 2683-TS-02 Rev P2 LEO-BDP-ZZ-05-DR-A-PL-1216 Rev P06 LEO-BDP-ZZ-RL-DR-A-PL-1004 Rev P04 LEO-BDP-ZZ-RL-DR-A-PL-1001 Rev P03 2683-LA-03 Rev P7 LEO-BDP-ZZ-RL-DR-A-PL-1002 Rev P03 LEO-BDP-ZZ-ELE-DR-A-PL-1370 Rev P02

LEO-BDP-ZZ-ELE-DR-A-PL-1371 Rev P02  
 LEO-BDP-ZZ-ELE-DR-A-PL-1372 Rev P02  
 LEO-BDP-ZZ-ELE-DR-A-PL-1373 Rev P03  
 LEO-BDP-ZZ-ZZ-DR-A-PL-1374 Rev P02  
 LEO-BDP-ZZ-ZZ-DR-A-PL-1375 Rev P02  
 LEO-BDP-ZZ-ZZ-DR-A-PL-1376 Rev P02  
 LEO-BDP-ZZ-ZZ-DR-A-PL-1411 Rev P03  
 LEO-BDP-ZZ-ZZ-DR-A-PL-1413 Rev P02  
 LEO-BDP-ZZ-ZZ-DR-A-PL-1419 Rev P01  
 LEO-BDP-ZZ-RL-DR-A-PL-1003 Rev P03  
 LEO-BDP-ZZ-04-DR-A-PL-1215 Rev P08  
 LEO-BDP-ZZ-ZZ-DR-A-PL-1410 Rev P03

<b>Date Plans Received:</b>	07/03/2022	<b>Date(s) of Amendment(s):</b>	06/10/2022
<b>Date Application Valid:</b>	07/03/2022		16/06/2022
			19/12/2022
			30/01/2023
			07/03/2022
			21/09/2022
			03/07/2022

## 1. SUMMARY

This application is for reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19. The outline application granted consent for means of site access from the central access road, now known as Burton Road, within St Andrews and for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works. Internal access, layout, scale, appearance and landscaping were reserved for subsequent approval, for which this application seeks consent.

The scale and massing are in accordance with the outline consent and the design of the proposals is considered to be appropriate. The application proposes 90 dwellings, including 28 no. 1 bedroom units (31%), 48 no. 2 bedroom units (53%) and 14 no. 3 bedroom units (16%). The proposed mix represents a minor conflict with Policy DMH 2 at 16% family units. However, on balance, the scheme is delivering 35% affordable housing that would be policy and tenure compliant. If the quantum of family units were higher, the scheme would be unable to deliver the same level of affordable housing.

The application site is also now within Uxbridge Town Centre as designated by the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). This is an area where a higher proportion of one and two bedroom units are considered to be acceptable as set out by Policy H10 of the London Plan (2021). The proposed development would provide 14 x 3 bedroom dwellings, which is an increase on the 12no. originally proposed at outline stage. The Council's Policy Team Manager raises no objection to the housing mix proposed.

The Reserved Matters application is in accordance with the outline consent reference 585/APP/2017/2819 and is deemed to essentially accord with relevant local and national

policies while delivering a substantial number of new dwellings.

As such the application is recommended for approval.

## **2. RECOMMENDATION**

**APPROVAL subject to the following:**

### **1 COM4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

LEO-BDP-ZZ-RL-DR-A-PL-1001 Rev P03 Site Location Plan

LEO-BDP-ZZ-RL-DR-A-PL-1004 Rev P04 Proposed Site Block Plan

LEO-BDP-ZZ-00-DR-A-PL-1210 Rev P09 Proposed Plan - Level LG

LEO-BDP-ZZ-00-DR-A-PL-1211 Rev P13 Proposed Plan - Level 00

LEO-BDP-ZZ-01-DR-A-PL-1212 Rev P07 Proposed Plan - Level 01

LEO-BDP-ZZ-02-DR-A-PL-1213 Rev P07 Proposed Plan - Level 02

LEO-BDP-ZZ-03-DR-A-PL-1214 Rev P07 Proposed Plan - Level 03

LEO-BDP-ZZ-04-DR-A-PL-1215 Rev P08 Proposed Plan - Level 04

LEO-BDP-ZZ-05-DR-A-PL-1216 Rev P06 Proposed Plan - Level RF

LEO-BDP-ZZ-ELE-DR-A-PL-1271 Rev P02 Proposed Elevations - North East & South East (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1272 Rev P02 Proposed Elevations - South & West (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1273 Rev P02 Proposed Elevation - South West (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1170 Rev P06 Proposed Context Elevations North & East

LEO-BDP-ZZ-ELE-DR-A-PL-1171 Rev P07 Proposed Context Elevations South & West

LEO-BDP-ZZ-ELE-DR-A-PL-1270 Rev P04 Proposed Elevation - North (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1274 Rev P04 Proposed Elevations - North & East (Block B)

LEO-BDP-ZZ-ELE-DR-A-PL-1275 Rev P04 Proposed Elevations - South & West (Block B)

LEO-BDP-ZZ-ZZ-DR-A-PL-1410 Rev P03 Apartment Types (1 Bedroom) Sheet 1 of 2

LEO-BDP-ZZ-ZZ-DR-A-PL-1411 Rev P03 Apartment Types (1 Bedroom) Sheet 2 of 2

LEO-BDP-ZZ-ZZ-DR-A-PL-1412 Rev P03 Apartment Types (2 Bedrooms) Sheet 1 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1413 Rev P02 Apartment Types (2 Bedrooms) Sheet 2 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1414 Rev P04 Apartment Types (2 Bedrooms) Sheet 3 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1415 Rev P03 Apartment Types (3 Bedrooms) Sheet 1 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1416 Rev P04 Apartment Types (3 Bedrooms) Sheet 2 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1417 Rev P03 Apartment Types (3 Bedrooms) Sheet 3 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1418 Rev P02 Part M4(3) Unit

LEO-BDP-ZZ-ZZ-DR-A-PL-1419 Rev P01 Apartment Types (Duplex Units)

LEO-BDP-ZZ-ELE-DR-A-PL-1370 Rev P02 Bay Study 01

LEO-BDP-ZZ-ELE-DR-A-PL-1371 Rev P02 Bay Study 02

LEO-BDP-ZZ-ELE-DR-A-PL-1372 Rev P02 Bay Study 03

LEO-BDP-ZZ-ELE-DR-A-PL-1373 Rev P03 Car Park entrance Study

LEO-BDP-ZZ-ZZ-DR-A-PL-1374 Rev P02 Core 1 Entrance Study

LEO-BDP-ZZ-ZZ-DR-A-PL-1375 Rev P02 Core 2 Entrance Study

LEO-BDP-ZZ-ZZ-DR-A-PL-1376 Rev P02 Core 3 Entrance Study

LEO-BDP-ZZ-00-DR-A-PL-1220 Rev P01 Proposed Plan Level LG Indicative Location of Additional Accessible Parking Bays

2683-LA-03 Rev P7 Landscape Masterplan

400101-BDP-16-00-DR-A-2011 Rev B Parameter Plan - Landscape

2683-TS-02 Rev P2 Tree Removal/Retention Plan; and shall thereafter be retained/maintained for as long as the development remains in existence.

## REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

### **2 COM5 General compliance with supporting documentation**

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

Design and Access Statement - Reserved Matters 3002349-BDP-ZZ-XX-RP-A-0001-08 Rev 08

Fire Statement Report AF2674 Issue 01 3rd March 2022

Reserved Matters Planning Statement March 2022 Rev 01

CO2 Emissions Calculations 26th April 2022

Planning Statement Addendum September 2022

Transport Addendum Note 5105977 03/03/22

LEOMB Internal Daylight Sunlight Addendum Report 24th November 2022

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence.

## REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

### **3 NONSC Photovoltaics**

Prior to above ground works, full details including specifications of the Photovoltaics required to deliver the CO2 reductions as set out in the Energy Statement Addendum dated April 2018 shall be submitted to the Local Planning Authority for approval in writing. The details shall include the type and size of PVs, as well as elevations and a roof plan showing their incorporation on the roof space and the method for fixing them to the roof. The details shall also include the methods for monitoring the use of the PVs and the collection and use of any 'feed in tariffs'. The development must proceed in accordance with the approved plans.

## REASON

To ensure the development achieves CO2 reductions in accordance with Policy SI 2 of the London Plan (2021), Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies DMEI 1, DMEI 2 and DMEI 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **4 RES13 Obscure Glazing**

The window(s) facing west towards the building known as the 'Mons Block' shall be glazed with permanently obscured glass to at least scale 4 on the Pilkington scale and be non-opening below a height of 1.8 metres taken from internal finished floor level for so long as the development remains in existence.

## REASON

To prevent overlooking to adjoining properties in accordance with policies DMHB 11 and DMHD 1-2 of the Hillingdon Local Plan Part 2 (2020).

## INFORMATIVES

### **1**

The applicant is advised that the details submitted to discharge Condition 7 (Landscaping)

of the outline consent should include details of the 5 trees proposed to replace the two trees hereby consented to be removed. The submission should also include details of the secure hedging and railing proposed for the ground floor and podium levels.

## **2 I52 Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

## **3 I53 Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMAV 1	Safe Operation of Airports
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development

LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking

#### **4 I70 LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

#### **5 I73 Community Infrastructure Levy (CIL) (Granting Consent)**

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at [planning@hillingdon.gov.uk](mailto:planning@hillingdon.gov.uk). The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at: [www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil](http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil)

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

The application site forms part of St Andrews Park (the former RAF Uxbridge Site). The site is an area of land located in the western part of the wider site to the east of the Mons Barrack Block which is locally listed. The site is bounded by Hillingdon Road to the west, Burton Road and Phase 3C to the south, Churchill Road and Phase 4 to the east and the remaining sections of the future Town Centre Extension to the north. The Southern boundary of the site is occupied by a line of mature horse chestnut trees, the majority of which are to be retained, forming an important strategic landscape green link.

#### **3.2 Proposed Scheme**

Planning consent reference 585/APP/2017/2819 dated 14-03-19 granted permission for 'Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.'

This application relates to the reserved matters submission following that grant of consent. The principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access and movement and tree retention and removal. Therefore, the emerging proposals are in relation to internal layout, scale, appearance, access (internal only) and landscaping in accordance with the requirements of Condition 2 of planning permission ref: 585/APP/2017/2819.

In summary, the key features of the proposed development are:

- 90 residential dwellings comprising a mix of:

- 1 x 1 bed 1 person
- 27 x 1 bed 2 person
- 17 x 2 bed 3 person
- 31 x 2 bed 4 person
- 2 x 3 bed 4 person
- 9 x 3 bed 5 person
- 3 x 3 bed 6 person

This equates to 28 no. 1 bedroom units (31%), 48 no. 2 bedroom units (53%) and 14 no. 3 bedroom units (16%).

Unit Type 2A is included in the above as 2 bed 3 person units, however they have been designed so that they can be delivered without structural alteration as a 2 bed 4 person M4(2) unit or a 2 bed 3 person M4(3) Wheelchair User Home. 9 of the 13no. proposed Type

2A units are proposed to be delivered as Part M4(3) Wheelchair User Homes in accordance with Condition 11 of the outline consent. The location of the part M4(3) units is required to be confirmed prior to occupation in accordance with Condition 11.

- Affordable provision of 35% by habitable room
- 10% wheelchair accessible units in accordance with Part M4(3) and the remaining 90% in accordance with Part M4(2).
- 63 car parking spaces (ratio of 0.7 spaces per unit), including 7 accessible spaces (10%) for wheelchair users
- 90 long stay cycle spaces for residents (including 10 spaces for larger cycles)
- 5 motorcycle parking spaces
- Private and communal amenity space
- Soft and hard landscaping

The development consists of 2 blocks of up to 6 storeys set around a podium level communal amenity space for residents. This would supplement the private amenity provision offered by balconies and terraces for each individual unit.

The slope across the site means that at the west of the site this podium area would be level with the surrounding roads, while at the eastern end it is a storey above the adjacent roads. This enables the development of a proposed lower ground level incorporating apartments along the eastern facade and access to basement car and cycle parking beneath the podium level.

A substantial portion of the site along its southern edge is given over to informal open space enabling the retention of a row of significant trees and creating a strong green link across the masterplan area from West to East connecting to St Andrew's Park.

An external substation is also proposed as it has been identified that there is no connection to an electrical substation for the site. As such, the proposals have incorporated a substation that has been located externally to the building so that it is able to serve future buildings and developments in the surrounding area if required. The proposed substation is proposed to be located within the public realm in the south-eastern corner of the site and the landscaping proposals include screening of this by evergreen planting.

### 3.3 Relevant Planning History

585/APP/2009/2752 R A F Uxbridge Hillingdon Road Uxbridge

1. Outline application (all matters reserved, except for access) including demolition of some existing buildings and:
  - a) Creation of up to 1,296 residential dwellings (Class C3) of between 2 to 6 residential storeys;
  - b) Creation of up to 77 one-bedroom assisted living retirement accommodation of between 3 to 4 storeys;
  - c) Creation of a three-form entry primary school of 2 storeys;
  - d) Creation of a hotel (Class C1) of 5 storeys of up to 90 beds;
  - e) Creation of a 1,200 seat theatre with ancillary cafe (Sui Generis); office (Class B1a) of up to 13,860sq.m; energy centre (Sui Generis) of up to 1,200sq.m; and retail (Class A1, A2, A3, A4, A5) of up to 2,850sq m; in buildings of between 4 to 6 storeys as well as a tower element associated with the theatre of up to 30m;
  - f) Creation of a local centre to provide up to 150sq.m of retail (Class A1 and A2) and 225sq.m GI surgery (Class D1); Means of access and improvements to pedestrian linkages to the Uxbridge Town centre; car parking; provision of public open space including a district park; landscaping; sustainable infrastructure and servicing.

2. In addition to the above, full planning permission for:
- a) Creation of 28 residential dwellings (Class C3) to the north of Hillingdon House of between 2 to 3 storeys as well as associated amenity space and car parking;
  - b) Change of use of Lawrence House (Building No. 109) to provide 4 dwellings (Class C3), associated amenity space and car parking including a separate freestanding garage;
  - c) Change of use and alterations to the Carpenters building to provide 1 residential dwelling (Class C3);
  - d) Change of use and alterations to the Sick Quarters (Building No. 91) to provide 4 dwellings (Class C3) as well as associated amenity space and car parking;
  - e) Change of use of Mons barrack block (Building No. 146A) to provide 7 dwellings (Class C3) as well as associated amenity space and car parking.
  - f) Change of use of the Grade II listed former cinema building to provide 600sq.m Class D1/2 use (no building works proposed);
  - g) Change of use and alterations to the Grade II listed Hillingdon House to provide 600sq.m for a restaurant (Class A3) on the ground floor and 1,500sq.m of office (Class B1) on the ground, first and second floors;

**Decision:** 18-01-2012 Approved

585/APP/2015/848 St Andrews Park Hillingdon Road Uxbridge

Variation of condition 5 of planning permission ref: 585/APP/2009/2752 dated 18/01/2012 (redevelopment of former RAF Uxbridge site) to amend approved plans and drainage strategy regarding the Town Centre Extension phase of the development.

**Decision:** 21-12-2015 Approved

585/APP/2016/4442 St Andrew'S Park Hillingdon Road Uxbridge

Reserved matters (layout, scale, appearance and landscaping) for the erection of 101 dwellings together with associated parking and landscaping within the Town Centre Extension (East/Dice) Phase of planning permission ref. 585/APP/2015/848 dated 21-12-2015.

**Decision:** 10-01-2018 Approved

585/APP/2016/4504 St Andrew'S Park Hillingdon Road Uxbridge

Reserved matters (layout, scale, appearance and landscaping) for the erection of 294 dwellings and up to 469 sq.m of retail floorspace (use classes F.2, E and Public House/Takeaway (Sui Generis), formerly A1-5) development together with associated parking and landscaping within the Town Centre Extension (West) Phase of planning permission ref. 585/APP/2015/848 dated 21-12-2015.

**Decision:** 30-11-2021 Approved

585/APP/2017/2819 Land East Of Mons Barrack Block, St Andrew'S Park Hillingdon Road

Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.

**Decision:** 01-08-2018 Approved

585/APP/2019/829 Land Off Thompson Rd & St Luke'S Rd, Former Raf Uxbridge Hillingdon  
Erection of a building containing 72 assisted living apartments and communal facilities (Use Class C2) with associated parking and landscaping.

**Decision:** 21-08-2019 Approved

585/APP/2022/149 St Andrews Park Hillingdon Road Uxbridge  
Details pursuant to the partial discharge of Conditions 62 (Tree Protection) and 66 (Method Statement) for the Town Centre West Phase of planning permission reference 585/APP/2015/84 approved 21-12-15 (Variation of condition 5 of planning permission ref: 585/APP/2009/2752 date 18/01/2012 (redevelopment of former RAF Uxbridge site) to amend approved plans and drainage strategy regarding the Town Centre Extension phase of the development).

**Decision:** 14-10-2022 Withdrawn

#### **Comment on Relevant Planning History**

The application site sits within the former RAF Uxbridge site, now known as St Andrews Park. Planning permission was approved on 18th January 2012 under application reference 585/APP/2009/2752 for the following across the wider site:

1. Outline application (all matters reserved, except for access) including demolition of some existing buildings and:
  - a. Creation of up to 1,296 residential dwellings (Class C3) of between 2 to 6 residential storeys;
  - b. Creation of up to 77 one-bedroom assisted living retirement accommodation of between 3 to 4 storeys;
  - c. Creation of a three-form entry primary school of 2 storeys;
  - d. Creation of a hotel (Class C1) of 5 storeys of up to 90 beds;
  - e. Creation of a 1,200 seat theatre with ancillary cafe (Sui Generis); office (Class B1a) of up to 13,860 sq m; in buildings of between 4 to 6 storeys as well as a tower element associated with the theatre of up to 30m;
  - f. Creation of a local centre to provide up to 150 sq m of retail (Class A1 and A2) and 225 sq m GP surgery (Class D1); means of access and improvements to pedestrian linkages to the Uxbridge Town Centre; car parking; provision of public open space including a district park; landscaping; sustainable infrastructure and servicing.
2. In addition to the above, full planning permission for:
  - a. Creation of 28 residential dwellings (Class C3) to the north of Hillingdon House of between 2 to 3 storeys as well as associated amenity space and car parking;
  - b. Change of use of Lawrence House (Building no. 109) to provide 4 dwellings (Class C3), associated amenity space and car parking including a separate freestanding garage;
  - c. Change of use and alterations to the Carpenters building to provide 1 residential dwelling (Class C3);
  - d. Change of use and alterations to the Sick Quarters (Building No. 91) to provide 4 dwellings (Class C3) as well as associated amenity space and car parking;

- e. Change of use of Mons barrack block (Building No. 146A) to provide 7 dwellings (Class C3) as well as associated amenity space and car parking;
- f. Change of use of the Grade II listed former cinema building to provide 600sqm Class D1/2 use (no building works proposed);
- g. Change of use and alterations to the Grade II listed Hillingdon House to provide 600 sq m for a restaurant (Class A3) on the ground floor and 1,500 sq m of office (Class B1) on the ground, first and second floors.

Of particular significance to the current application is element 2 (e) of this consent 'Change of use of Mons barrack block (Building No. 146A) to provide 7 dwellings (Class C3) as well as associated amenity space and car parking'. The Mons Block sits at the western end of the application site.

An application for a non-material amendment to vary the Phasing Plan was approved in January 2015 (Application Ref. 585/APP/2014/4023). An application to amend the approved parameter plans for the outline consent was approved under planning permission reference 585/APP/2015/848 dated 21-12-15. This permission supersedes the original outline permission reference 585/APP/2009/2752.

Various applications for Reserved Matters relating to Phases 1, 2, 3, 4, 6, The Dice buildings and Town Centre West have been approved and development has commenced on site.

The area covered by Reserved Matters application reference 585/APP/2016/4504 dated 18-03-22 for the Town Centre West Phase overlapped with the area of the site covered by this application. The Reserved matters consent approved 23 Town Houses on the area of land East of the Mons Barrack block on which 90 residential units are proposed within the current application.

Application reference 585/APP/2017/2819 dated 14-03-19 granted consent for 'Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.'

The current application is for the Reserved Matters relating to this outline consent. It should be noted that the outline consent included a number of conditions which secured the need for details to be provided to and approved by the Local Planning Authority.

#### **4. Planning Policies and Standards**

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

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

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

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

The proposed development would be assessed against the policies and proposals in the Development Plan set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

### **UDP / LDF Designation and London Plan**

The following Local Plan Policies are considered relevant to the application:-

#### Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM6 (2012) Flood Risk Management
- PT1.H1 (2012) Housing Growth
- PT1.H2 (2012) Affordable Housing
- PT1.HE1 (2012) Heritage

#### Part 2 Policies:

- DMAV 1 Safe Operation of Airports
- DMCI 3 Public Open Space Provision
- DMCI 4 Open Spaces in New Development
- DMCI 5 Childrens Play Area
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DMEI 1 Living Walls and Roofs and Onsite Vegetation
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 12 Development of Land Affected by Contamination
- DMEI 13 Importation of Material
- DMEI 14 Air Quality
- DMEI 2 Reducing Carbon Emissions
- DMEI 7 Biodiversity Protection and Enhancement
- DMEI 9 Management of Flood Risk
- DMH 2 Housing Mix
- DMH 7 Provision of Affordable Housing
- DMHB 1 Heritage Assets
- DMHB 10 High Buildings and Structures
- DMHB 11 Design of New Development
- DMHB 12 Streets and Public Realm
- DMHB 14 Trees and Landscaping
- DMHB 15 Planning for Safer Places
- DMHB 16 Housing Standards
- DMHB 17 Residential Density

DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking

## **5. Advertisement and Site Notice**

**5.1 Advertisement Expiry Date:- 13th April 2022**

**5.2** Site Notice Expiry Date:- Not applicable

## **6. Consultations**

### **External Consultees**

Consultation letters were sent to 131 local owner/occupiers on 14/03/22 and site notices were also posted. Two letters of objection have been received that can be summarised as:

- Insufficient parking
- Proposed electric vehicle charging facilities are inadequate
- Removal of some of the trees along Burton Road/junction with Churchill Road is unnecessary
- Existing poor quality landscaping
- Increased pressure on amenities, including schools and transport

### **LONDON FIRE BRIGADE**

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required. Please note that full documentation will be expected when contacting LFB for a building regulations consultation, in order to provide a more detailed response.

The Applicant is advised to ensure the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector who in some circumstances may be obliged to consult the Fire Authority.

### **Internal Consultees**

#### **POLICY OFFICER**

Housing Size Mix

Policy H10 of the London Plan (2021) states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes local evidence of need. Policy DMH 2 of Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.

Family housing is defined within the glossary of the London Plan (2021) and outlines it must generally be of a size that has three or more bedrooms. It is worth noting that the Secretary of State directed changes to Policy H10, in order address the need for new family housing, to prevent families from being forced to move outside of London. These changes were incorporated into the final version of the London Plan (2021). It should be noted that the adoption of the Local Plan: Part 2 (2020) and London Plan (2021) policies on housing size mix are a significant shift from previous iterations of the development plan.

The proposal would be for the following housing size mix:

- 29 x 1 Bedroom (32.2%)
- 49 x 2 Bedroom (54.4%)
- 12 x 3 Bedroom (13.3%)

The proposal has increased the number of family units by one since the pre-application submission. It is clear that the site still does not conform to the council's local evidence of housing need. In terms of the site-specific factors outlined in Policy H10 that may allow a different mix, it is noted that the site is within the Uxbridge Town Centre boundary, albeit at the very edge. However, it is not near to a station and has a PTAL rating of only 2. The scheme is purely residential and there is no requirement to provide non-residential development, which may reduce the ability of the site to provide family units. Furthermore, there are not deemed to be any other site constraints which would prohibit the inclusion of a much higher proportion of family units.

As previously outlined in November 2021, the housing mix for the previous application (585/APP/2016/4504) was only considered to be acceptable on balance with the inclusion of 27 townhouses. This proposal seeks to replace these family sized units with just 12 equivalent properties. It is not considered that Paragraph 7.40 of the Planning Statement explains how the proposal is in conformity with the relevant policies or justifies a departure from them.

Case Officer comments:

The outline consent for the site included a proposed housing mix that was considered acceptable and approved, taking into consideration that the wider St Andrews Park development has provided significant levels of family housing. Phases 1, 2, 3, 4 and 6 have delivered the majority of their units as family dwellings. Through pre-application discussions the number of 3 bed units has increased. Following receipt of the above comments the applicant has further increased the number of 3 bed units from 12no to 14no. The Council's Policy Officer has confirmed that the level of family housing is now considered to be acceptable.

#### ACCESS OFFICER

This application is for reserved matters pursuant to planning permission 585/APP/2017/2819 for 90 residential dwellings 10% of which are required to be wheelchair user dwellings in accordance with the 2016 London Plan policy 3.8, with all remaining units to the M4(2) standard.

1. Condition 8 of the above approval requires an allocated and dedicated parking space to each of the residential units. It is unclear how this arrangement could work, firstly because only 63 spaces (0.7 spaces per unit) are proposed for 90 residential units, and secondly, where parking is provided, all M4(3) units should each be allocated a dedicated parking space (as set out in Approved Document M).

2. As required by Condition 11 drawing no. LEO-BDP-ZZZZ- DR-A-PL-1418, Rev. P01 has been submitted for the M4(3) unit design. Accessible housing should be interspersed throughout the buildings and across all types and tenures. One bed units are of little use to most wheelchair users therefore, of the required nine M4(3) units, five x 2 bed and four x 3 bed units should be provided.

3. The Design and Access Statement should be amended to reflect the above changes and submitted to ensure compliance with Condition 4 of the above Outline Approval.

Conclusion: amendments are requested as per points 1-3 above.

Case Officer comment's:

It should be noted that Condition 8 of the outline consent requires that the parking be allocated to the residential use proposed and the parking level provided is in accordance with the outline consent. In addition no one bed units are proposed as M4(3) units. The Council's Access Officer's comments were provided to the applicant who has provided a response setting out the impact of increasing the number of 3 bedroom M4(3) units, as set out within Section 7.12 of this report. The Council's Access Officer has reviewed this response and confirmed that they no longer require any amendments to the proposals.

## FLOODING

The landscaping plan does not show it integrates with the need to deliver Condition 15 on surface water management as requested and specified in the planning application that Surface Water detailed design will include a variety of Sustainable Drainage Measures within the site. This may mean that requirements are required to the landscaping plan in order to meet requirements within any subsequent drainage plan submitted.

It is not indicated how in the landscaping plan this complies with requirements that all amenity space should also be designed to be dual purpose and above ground solutions where possible at the source to control water other than some indicated permeable paving. Many of the landscaped area appear raised rather than lowered i.e. where it first reaches the ground rather than being conveyed elsewhere.

### Case Officer's comments:

These comments were provided to the applicant who has advised on the proposed sustainable drainage techniques. In addition Condition 15 attached to the outline consent ref. 585/APP/2017/2819 requires the full details of a drainage strategy, detailing any on and/or off-site drainage works, including surface water drainage, to be submitted and approved by the local planning authority. The submitted Landscape Masterplan provides sufficient flexibility to incorporate sustainable drainage techniques and the detailed landscape arrangement will be secured via the future discharge of Condition 7.

## LANDSCAPE ARCHITECT

This submission has been the subject of a pre-application presentation and discussion on 20 January 2022. The current D&AS (2.02) highlights three aspects of the landscape which were discussed:

- The indicative landscape proposals are acceptable in principle, but the functionality of the proposed spaces should be defined within the RM submission.
- It is accepted that Dowding Park can accommodate the playspace requirements of children above the age of 5.
- Defensible space should be provided in relation to the lower ground and ground floor apartments to ensure privacy.

The current submission includes a Landscape Strategy Report, prepared for VSM by Allen Pyke, dated 22 March 2022. The introduction confirms that the report has been prepared to support Condition 7 of the outline planning application ref. 585/2017/2819. The landscape strategy is in accordance with previously supported objectives, as summarised in section 2.0

An Urban Greening Factor of 0.36 has been calculated with an accompanying table and masterplan in section 3.0 The landscape typologies comprise; flower-rich perennial planting (score:1550), existing tree cover (score: 400), intensive green roof (score 300), hedges / shrubs (score: 100), with permeable paving contributing 79 and new tree planting 76. The overall score may need to be revised downwards if the scheme is amended or mature trees removed.

Section 4.0 provides illustrative details and images of hard landscape materials including paving and external furniture.

Section 5.0 analyses the play space strategy, with reference to the London Plan Policy S4 and Hillingdon's policy DMHB19. The scheme provides < 200m<sup>2</sup> of informal play space for children of 0-5 years. The scheme will rely on its proximity to Dowding Park, within 100m of the site, for play and sporting activity for older children.

Section 6.0 outlines the planting strategy, with indicative species selections. In accordance with previous proposals this will include the retention of the existing trees, new tree planting with both

large and small /medium size trees, hedges, shrub/herbaceous mixes and flowering / species rich lawns.

Ecology and sustainability are considered in section 7.0, with the importance of suitable species selection and management / maintenance regimes acknowledged. One possible missed opportunity is the management of the wide grass verge beneath the trees alongside Burton Road.

#### Recommendations

1. The landscape strategy highlights the need for defensible space around ground floor (ground level and podium level) windows. The use of structural planting (hedges) is specified. These should be located on the outside of any railings / fences and maintained by the estate/ landscape management company, to ensure that they are consistently managed and maintained across the scheme - with any failed plants replaced with the same species.

2. The landscape strategy confirms; 'existing trees to be retained in accordance with the approved tree retention plan'. A recent tree report by Artemis has been queried because it recommends the felling and removal of two of the mature Horse chestnuts along the Burton Road frontage which have hitherto been schedule 'to be retained'. Clarification is required following advice from the Council's Arboricultural Manager.

3. Refer to the above notes regarding the potential downgrading of the UGF score, if it is found necessary to remove mature trees from the site.

4. There may be ways of enhancing the UGF and biodiversity of the site, by creating a wildflower, or floral, meadow under the trees alongside Burton Road. If this is done, the species mix should allow good sight lines and have close-mown edges to provide sharp definition. Other considerations include the provision of extensive green roofs beneath the PV's at roof level.

5. As noted by the drainage officer, there is no reference to SUDS, or how the landscape contributes to the SUDS strategy.

#### Case Officer comment's:

With regard to the revised Tree Removal / Retention Plan ref. 268-TS-02 Rev P2 that shows that an additional tree needs to be removed from the site, the Council's Arboricultural Manager has visited the site and has agreed with the conclusions. The revised Landscape Masterplan (ref. 2683-LA-03 LEO MONS GMP\_RevP7) includes an additional no. 5 trees (no. 3 in location of T49 and no. 2 to the south of Block B) to replace T49. The proposed replacement trees ensure the originally submitted UGF score of 0.36 is retained. The submitted Landscape Masterplan provides sufficient flexibility to incorporate sustainable drainage techniques and the detailed landscape arrangement will be secured via the future discharge of Condition 7.

#### ARBORICULTURAL MANAGER

I went and had a look at this just now. Both T40 and T49 are Horse Chestnuts, they have flushed with their spring leaves and have full canopies however on closer inspection their trunks have lots of decay and on this basis I would agree with the U category.

#### HIGHWAYS OFFICER

The Highway Authority require dropped kerbs and tactile paving is provided on the footways either side of Burton Road and Churchill Road entrances. Within the site double yellow lines should be provided at each of these access roads. This is to keep these areas free of parked cars which would otherwise obscure sight lines and hinder refuse vehicle access to the collection points as well as emergency service access.

To protect pedestrians using the ramp to access the lower ground level parking 1.5m wide coloured

surfacing should be provided with pedestrian markings to indicate it is where pedestrians should walk. This should be provided on the northern side of the ramp.

The doors to the Core 1 and Core 2 Cycle storage should open inwards.

Subject to the above there are no highway objections to this proposal.

HIGHWAYS OFFICER further comments

In their letter dated 8th September 2022 the applicant gave a satisfactory response to all the points raised by the Highway Authority. There are no highway objections to this proposal.

URBAN DESIGN AND CONSERVATION

The reserved matters application seeks to agree details for internal access, layout, scale, appearance and landscaping pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19 for the erection of up to 90 dwellings (Use Class C3).

The principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access, movement, tree retention / removal.

The proposed massing sits within and accords with the details shown on the approved parameter plan under the outline consent. No objection is raised to the siting and layout of the blocks as proposed. The separation distances between the habitable rooms of the proposed and adjacent blocks look to be acceptable, however, the separation distances on the north side are below 21 metres. It would be useful to see the window positions of TCW3a and TWC 3b in relation to those of the proposed scheme to determine any impacts.

The design of the elevations has been developed further from those presented at pre-application stage. The breaking down of the facade with recessed bays and decorative brick elements including the emphasis of the ground floor is supported and will help to break up the mass of the development and provide visual interest.

The design is generally considered acceptable and respectful to the surrounding development and should sit 'quietly' with the locally listed Mons Block to the west whilst also having a shared visual language with the other the other Town Centre West development.

The primary facing material of brick is supported in principle. The contrasting colours of red and dark blue brick would respect the established palette of materials in the locality and are an appropriate response. It will be important for the colour, tones and texture of the brick to be agreed along with the colour of the mortar. These could be controlled by conditions.

The principal entrances still do not appear to be celebrated enough and appear lost in the facade. These should be emphasised more possibly by the use of signage with the name of the residential block. Further detailed drawings of the communal entrances should be submitted.

There are concerns with the residential unit on the north elevation which is set below ground level. This would have an extremely poor outlook directly onto a blank retaining wall. The drawings also suggest that there would be a hedge around the top of the lightwell, but this would likely have to be railings on safety ground and would exacerbate the sense of enclosure. It would be more successful if the unit became a duplex encompassing the first-floor unit so that dwelling has a much improved outlook.

The detailed design of the access to the carparking is not shown in detail. Although this is not visible on the elevational drawings it would, in reality, be a prominent element due to the extent of

excavation required to incorporate the access road and would be visible to passers-by. This will need to be carefully detailed so that it does not draw undue attention and detract from the development. I would suggest additional detailed proposals for the vehicular entrance are also submitted with the application.

#### URBAN DESIGN AND CONSERVATION 2nd comments

The amended drawings received 21 /09/22 have addressed previous design concerns.

The submitted revised drawings refs. LEO-BDP-ZZ-00-DR-A-PL-1210 - Proposed Plan - Level LG\_P08 and LEO-BDP-ZZ-00-DR-A-PL-1211 - Proposed Plan - Level 00\_P11) show that the previously proposed northern lower ground floor unit, that was enclosed by a lightwell, has now been removed and replaced with two 3-bed duplex units across the lower ground and ground floors. This is a welcomed change that results in a better outlook for the residential units.

The proposed residential entrances are now better celebrated and are more visible on the elevation making the building more legible. These amendments are also supported. The proposed car parking entrance is now shown in more detail. Views towards this area will be framed by Block A and B and it is agreed that views would primarily be directed towards the podium landscaped area due to entrance being partially below ground level. The detailed design of this secondary element would not detract from the overall design quality of the development and is supported.

The amendments are considered acceptable and have addressed previous design concerns. No further objection is raised to the development.

#### DAYLIGHT AND SUNLIGHT CONSULTANT

##### Impact on neighbouring properties

P2 have included a section outlining the daylight amenity of the neighbouring consented St Andrews Blocks with the proposal in place.

P2 conclude from the analysis that while there may be several daylight alterations within these proposed blocks as a result of the development, they will not be material alterations.

AY are in agreement with the P2 conclusion that is no material change in the overall daylight levels to what was previously considered acceptable by the council.

##### Conclusions

Based on the previous Guidelines, AY are generally in agreement with the scope of properties assessed and methodology used in relation to the neighbouring assessments.

AY are in agreement with the implementation of the sunlight and overshadowing methodologies and the conclusions reached. The daylight and impacts on the consented neighbouring buildings are considered to be acceptable based on the negligible change in position with the introduction of the proposed.

##### Overshadowing

P2 carried out the required overshadowing assessments and reported on them in their February 2022 report based on the 2011 guidance. The February report outlined that the amenity areas assessed would be compliant for overshadowing against the 2011 BRE Criteria. As the proposed massing is the same and the methodology used for overshadowing has not changed with the 2022 guidance there is no requirement for further assessment.

##### Internal Daylight and Sunlight

From a review of the internal daylight, sunlight assessments undertaken we are satisfied that the scope is sufficiently comprehensive.

Daylight - The report outlines that 234 of the 256 rooms (91%) of rooms assessed within the proposed block will meet the lux targets set out in the guidance when LKD's are assessed against a 150 lux target. From a review of the results AY can confirm this is correct. While we would as standard practice also assess LKD's against a 200 lux target we agree these results demonstrate a high level of daylight compliance.

Sunlight - The report outlines that 82% of units will meet the BRE criteria for sunlight exposure regardless of orientation and that the majority of units failing are north facing. Following our review AY can confirm these statements are correct.

AY are satisfied with P2 conclusion that the schemes daylight and sunlight internal amenity is acceptable as per the 2022 guidance.

#### WASTE STRATEGY

The planning application states that the distance from the collection vehicle to the bin store is 25 meters in distance although the council policy states that the maximum pull distance for containers is 10 meters.

Ensure that there are dropped kerbs at every location a collection vehicle will stop.

Regarding the basement car park - please confirm the maximum height of vehicles to enter this basement.

#### WASTE STRATEGY 2nd comments

Please ensure there is a dropped kerb on each path from bin store to where the collection vehicle can safely stop. All other measures are satisfactory.

### **7. MAIN PLANNING ISSUES**

#### **7.01 The principle of the development**

Paragraph 119 of the NPPF (2021) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Policy GG4 of the London Plan (2021) seeks to ensure that more homes are delivered. This is reinforced by Policy H1 of the Local Plan: Part 1 - Strategic Policies (2012) which gives general support to housing provision to meet and exceed the Council's minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.

The principle of the proposed development was established under the site wide outline planning consent for the former RAF Uxbridge site and under the outline planning consent reference 585/APP/2017/2819 for this site that granted permission for 'Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.'

#### **7.02 Density of the proposed development**

Policies H1 and SD6 of the London Plan (2021) encourage the comprehensive mixed use redevelopment of sites to enable the provision of high density residential and mixed use

development in accessible locations, whilst also supporting the overall vitality of town centres. Policies D1 to D4 of the London Plan (2021) place greater emphasis on a designed approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure.

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states Hillingdon will apply the density standards in a flexible manner, according to local circumstances. Supporting paragraph 5.66 recognises that areas such as Uxbridge town centre are more suited to higher density development, which in some cases may exceed London Plan Standards.

Numerical density standards have recently been removed from the adopted London Plan 2021 to avoid the quantitative standards being applied mechanistically.

The site has an approximate area of 0.7ha and therefore the proposed scheme has a density of 129 units per hectare which sits within the density range recommended by the London Plan at the time of the outline consent being approved.

The density proposed is now slightly below that recommended by Policy DMHB 17 and the supporting Table 5.2 which has a range of 165 to 405 u/ha for Uxbridge Town Centre sites. However this suggested density range is for areas with a PTAL of 4-6 and the application site has a PTAL rating of 3, with a small section of PTAL rating 2. The density range within Table 5.2 for 'Other Town Centres' with a PTAL of 2-3 is 80 to 170 u/ha within which the proposed density sits.

As stated above Policy DMHB 17 states Hillingdon will apply the density standards in a flexible manner, and the numerical density standards have recently been removed from the adopted London Plan 2021.

Therefore, the proposed density is considered to be appropriate, in particular when compared to the 27 units previously consented and as such represents an optimisation of the site. In addition the outline scheme was considered to represent an appropriate density for the site and development of up to 90 dwellings was consented and has therefore been established under consent reference 585/APP/2017/2819.

## HOUSING MIX

Policy H10 of the London Plan (2021) states that new development should consist of a range of unit sizes, 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.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3 bedroom properties, as identified in the Strategic Housing Market Assessment 2016.

In accordance with Policy DMH 2 Hillingdon Local Plan: Part 2 - Development Management Policies (2020), developments should demonstrate how the provision of family housing has

been optimised, to address local needs.

This scheme's location is now within Uxbridge Town Centre as designated by the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). This is an area where a higher proportion of one and two bedroom units are considered to be acceptable as set out by Policy H10 of the London Plan (2021). The proposed development would provide 14 x 3 bedroom dwellings, which is an increase on the 12no. originally proposed at outline stage. These units would contribute towards the Borough's need for family sized housing, plus the identified substantial need for one- and two-bedroom units.

The proposed mix represents a minor conflict with Policy DMH 2 at 15.6% family units. However, on balance, the scheme is delivering 35% affordable housing that would be policy and tenure compliant. If the quantum of family units were higher, the scheme would be unable to deliver the same level of affordable housing.

Taking this into consideration, along with the sites location within Uxbridge Town Centre, the increase in family units since the outline stage and the significant number of family dwellings that have been consented or delivered within the wider St Andrews site, the mix is considered to be acceptable.

The Council's Policy Team Manager has reviewed the submitted details and confirmed that the proposed housing mix, following the increase in 3 bed units, is now deemed to be acceptable.

Accordingly, it is considered that the proposal would consist of an appropriate housing mix in accordance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021).

### **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

The NPPF (2021) Chapter 16 requires the conserving and enhancing of the historic environment. Paragraphs 189-208 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 201 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy HC1 of the London Plan (2021) requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, including registered historic parks, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy HE1 of the Local Plan: Part One (2012) states the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens and historic landscapes, both natural and designed.

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:

i) it sustains and enhances the significance of the heritage asset and puts them into viable

- uses consistent with their conservation;
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
  - iii) it makes a positive contribution to the local character and distinctiveness of the area;
  - iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
  - v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
  - vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
  - vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

Policy DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) Applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.

C) The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required.

D) Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Policy DMHB 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.

C) Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.

Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020) states that:

A) All development, including extensions, alterations and new buildings will be required to

be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
  - scale of development, considering the height, mass and bulk of adjacent structures;
  - building plot sizes and widths, plot coverage and established street patterns;
  - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
  - architectural composition and quality of detailing;
  - local topography, views both from and to the site; and
  - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

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

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The proposals are within the setting of a Grade II Listed Building - The Former Cinema Building, and a Locally Listed Building (non-designated heritage asset) - The Mons Block.

The principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access and movement and tree retention and removal. Therefore, the emerging proposals are in relation to internal layout, scale, appearance, access (internal only) and landscaping in accordance with the requirements of Condition 2 of outline planning permission ref: 585/APP/2017/2819.

The proposed massing sits within and accords with the details shown on the approved parameter plan under the outline consent. The Council's Design and Conservation Officer has reviewed the application and provided detailed comments. No objection has been raised to the siting and layout of the blocks as proposed.

The Council's Conservation and Design Officer has been involved throughout the pre-application process and raises no objections to the design of the amended proposals, noting that concerns over a proposed material can be resolved through the discharge of Condition 10 attached to the outline consent. Residential buildings were approved in this location as part of the outline consent for the development and the buildings have been designed to a high standard with architectural interest and respond appropriately to the heritage assets. The Council's Conservation and Design Officer has commented the design is considered acceptable and respectful to the surrounding development and should sit 'quietly' with the locally listed Mons Block to the west whilst also having a shared visual

language with the consented Town Centre West phase of the development. The maximum height of the buildings was reduced adjacent to the Mons Block and a separation distance secured as part of the outline planning consent.

As such the proposal is considered to be acceptable and in accordance with Policies HC1 of the London Plan (2021), HE1 of the Local Plan: Part One (2012) and DMHB 1, DMHB 2, DMHB 3 and DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

## ARCHAEOLOGY

Paragraph 194 of the NPPF (2021) states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Policy HC1 'Heritage conservation and growth' of the London Plan states:

A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent

weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

The site is not in a location that is archaeologically sensitive. The Greater London Archaeological Advisory Service reviewed the outline application and raised no objection to the development nor requested that any conditions be attached to any grant of planning consent.

The proposed development is therefore deemed to accord with Policy DMHB 7 of the Local Plan: Part 2 - Development Management Policies (2020), Policy HC1 the London Plan (2021) and the NPPF.

#### **7.04 Airport safeguarding**

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

A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

B) In consultation with the Airport Operator, the Council will ensure that:

- i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and
- ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

Heathrow Airport and the National Air Traffic Services were both been consulted on the outline application and confirmed that they had no objections to the proposals. The submitted reserved matters are within the massing parameters consented at outline stage.

The proposed development is therefore deemed to accord with Policy DMAV 1 of the Local Plan: Part 2 Development Management Policies (2020).

#### **7.05 Impact on the green belt**

Paragraph 137 of the NPPF (2021) states that the essential characteristics of Green Belts are their permanence and openness.

Paragraph 147 of the NPPF (2021) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 of the NPPF (2021) requires local planning authorities to ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Policy G2 of the London Plan (2021) states that the strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Policy DMEI 6 of the Local Plan: Part Two (2020) states that new development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries. Dowding Park is designated as Green Belt land and lies 100metres from the site.

The land directly to the east of the site within the new Dowding District Park is designated as green belt. However, the site itself is not within the green belt and is separated from the green belt by consented development that is in the final stages of construction. In addition, the location and massing of the proposed scheme was approved under the outline consent. As such the proposals are considered to have an acceptable impact on the green belt and are deemed to be in accordance with relevant policy.

#### **7.07 Impact on the character & appearance of the area**

Policy BE1 of the Local Plan: Part One (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two (2020) re-emphasises the importance of good design in new development by

- A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure;
- B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space;
- C) safeguarding the development potential of adjoining sites and
- D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 of the Local Plan: Part Two (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access and movement and tree retention and removal. Therefore, the emerging proposals are in relation to internal layout, scale, appearance, access (internal only) and landscaping in accordance with the requirements of Condition 2 of outline planning permission ref: 585/APP/2017/2819.

The proposed massing sits within and accords with the details shown on the approved parameter plan under the outline consent. The Council's Design and Conservation Officer

has reviewed the application and provided detailed comments. No objection has been raised to the siting and layout of the blocks as proposed.

The design of the elevations has been developed following advice provided by the Council's Design and Conservation Officer. The breaking down of the facade with recessed bays and decorative brick elements including the emphasis of the ground floor is supported and will help to break up the mass of the development and provide visual interest.

The design is considered acceptable and respectful to the surrounding development and should sit 'quietly' with the locally listed Mons Block to the west whilst also having a shared visual language with the other the other Town Centre West development.

The primary facing material of brick is supported in principle. The contrasting colours of red and dark blue brick would respect the established palette of materials in the locality and are an appropriate response.

Concerns were raised with regard to the principal entrances as originally submitted. They were considered to not be celebrated enough and appear lost in the facade. Following design amendments to the proposals, the Council's Design and Conservation Officer has confirmed that the proposed residential entrances are now better celebrated and are more visible on the elevation making the building more legible.

Concerns were also raised with regard to the detailed design of the access to the car parking. This would, in reality, be a prominent element due to the extent of excavation required to incorporate the access road and would be visible to passers-by. Following further design amendments, the Council's Design and Conservation Officer has confirmed that the proposed car parking entrance is now shown in more detail. Views towards this area will be framed by Block A and B and it is agreed that views would primarily be directed towards the podium landscaped area due to entrance being partially below ground level. The detailed design of this secondary element would not detract from the overall design quality of the development and is supported.

In terms of materials, it is recognised that it will be important for the colour, tones and texture of the brick to be agreed along with the colour of the mortar. These details are controlled by a materials condition (Condition 10) attached to the outline planning consent.

The general layout and massing of the development has been approved under the outline planning consent. The design of the proposals has been revised in discussion with the Council's Design and Conservation area and is now considered to be acceptable and respectful to the surrounding development, including the locally listed Mons Block to the west, and to have a shared visual language with the adjacent Town Centre West development.

As such the proposals are considered to be in accordance with Policy BE1 of the Local Plan: Part One (2012), Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020).

#### **7.08 Impact on neighbours**

Paragraph 130 (f) of the NPPF (2021) states that new development should seek to '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'.

Policy D14 of London Plan (2021) states that in order to reduce, manage and mitigate noise to improve health and quality of life, proposals should manage noise by amongst other criteria, avoiding significant adverse noise impacts on health and quality of life and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of. or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses.

Policy BE1 of the Local Plan: Part One (2012) requires developments to be appropriately designed so that they do not adversely affect their surroundings or the local character.

Policy DMHB 11 part B) of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that development proposals should not adversely impact on the amenity of adjacent properties and open space.

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

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

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space".

The proposed layout, scale and massing of the proposals has been approved as part of the outline planning consent 585/APP/2017/2819. The development proposes separation distances of over 21m between existing and proposed habitable room windows so as to respect the residential amenity of existing residents and not to cause overshadowing or overdominance of properties. Along the Eastern boundary of the site the distance between Block A and the opposite Dice Block varies between 38m and 20m. Along the Southern boundary the distance between Blocks A and B and the houses to the South is over 36m.

The exception to the 21m habitable room window distance is those windows proposed closest to the consented Town Centre West development to the north and to those within the existing Mons Block to the west.

Only 2 windows per level of Town Centre West are less than 21m from the proposed scheme (18.3m or 20m separation distances is achieved). The 18.3m separation distance is between bedrooms in the proposed northern block and dual aspect living rooms in Town Centre West Block. The separation distance is between secondary windows to each of the living rooms affected. The secondary windows could reasonably be obscured by the

resident if desired while retaining the primary view from the living space. The separation distance between living rooms in the proposed block and the narrow southern elevation of the Town Centre West development is 20.1m. The elevational treatment and position of windows has been carefully designed to mitigate privacy concerns. It should be noted that where 21m has not been achieved it is across a public street and therefore the 21m separation distance is not as rigorously applied given that members of the public already use the intervening space.

Along the Western boundary the distance between the flank end walls of Blocks A and B and the Mons Block is just over 16m. Due to this proximity all windows in the upper levels of these flanks walls are either obscured glazing or designed as a splayed bay to direct views away from the Mons Block so as not to impact on privacy for future occupiers. A condition is recommended to be attached to any grant of planning consent to secure the obscure glazing.

The Council's Daylight and Sunlight specialist has reviewed the daylight and overshadowing impacts on the consented neighbouring buildings and confirms that they are considered to be acceptable.

The proposed separation distances and impact on consented dwellings are therefore considered to be acceptable and in accordance with Paragraph 130 (f) of the NPPF (2021), Policy D14 of London Plan (2021) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **7.09 Living conditions for future occupiers**

Policy D6 of the London Plan (2021) provides minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights that apply to all residential accommodation that is self-contained.

##### **Internal Space Standards**

Policy DMHB 16: 'Housing Standards' requires that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should meet or exceed the most up to date internal space standards.

All of the dwellings proposed comply with the internal space standards as set out in 'Minimum Space Standards for New Dwellings' of the London Plan 2021.

##### **Amenity Space**

Policy DMHB 18: 'Private Outdoor Amenity Space' of the Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the Council standards set out in Table 5.3. which are as follows:

- 1 bedroom flat - 20 sqm per flat
- 2 bedroom flat - 25 sqm per flat
- 3+ bedroom flat - 30 sqm per flat

Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

The development proposed is required to deliver the following external amenity space:

- 1 Beds x 28 x 20m<sup>2</sup> = 560m<sup>2</sup>
- 2 Beds x 48 x 25m<sup>2</sup> = 1200m<sup>2</sup>
- 3 Beds x 14 x 30m<sup>2</sup> = 420m<sup>2</sup>

Total = 2180m<sup>2</sup>

The application proposes a total of 2591m<sup>2</sup> of external amenity space across the site, including 1342.4m<sup>2</sup> of private garden and balcony amenity space and 1249m<sup>2</sup> of communal amenity space within the podium.

In total an excess of 411m<sup>2</sup> of external amenity space for use by residents of the development is proposed above the level required by Policy DMHB 18: 'Private Outdoor Amenity Space' of the Local Plan: Part 2 - Development Management Policies (2020). In addition, the site is within the wider St Andrews Park development, which includes the new 40 acre (16.2 hectare) District Park (now named Dowding Park) delivered as part of the wider scheme. Dowding Park is located close to the development site with strong pedestrian links available.

The proposal would therefore provide sufficient private outdoor amenity to fully comply with Policy DMHB 18, each property would benefit from its own private amenity space and the significant level of public open space already provided as part of the wider development, the proposed level of amenity for future occupiers is therefore deemed acceptable.

#### Child's Play

Policy DMHB 19 'Play Space' of the Local Plan: Part 2 - Development Management Policies (2020) states that new major residential developments which result in a significant net increase in child yield an occupancy of ten or more children will be required to provide children and young people's play facilities on-site. Where a satisfactory level of provision for children and young people's play facilities cannot be achieved on-site, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area.

Policy DMCI 5 'Children's Play Areas' of the Local Plan: Part 2 - Development Management Policies (2020) states that for all major development proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds. In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.

London Plan Policy S4 requires development proposals to make provisions for play and informal recreation based on the expected child population generated by a development. This is supported by the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10m<sup>2</sup> of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum, and makes clear that play space should not be segregated by tenure.

Based on the housing mix, the GLA calculator sets a total requirement at 10sqm per child of 324.2sqm of play space consisting of a requirement of:

- 164sqm for ages 0-4 (within 100m of the site)
- 112sqm for ages 5-11 (within 400m of the site)

- 32sqm for 12+ ages (within 800m of the site)

The application proposes up to 200sqm of play space for 0-4-year-old children to be delivered within the communal amenity space, which would be accessible to all residents. This provision is based on the maximum-case scenario and exceeds the 164sqm London Plan Policy S4 requirement.

The site is also located within 100m of the entrance to Dowding Park, which includes a play area and sports pitches. It is also located in close proximity to other play facilities (such as the play space on Churchill Road) and informal play elements in communal spaces within the wider St Andrew's Park development. These play spaces and Dowding Park are all within 400m walking distance of the site, in accordance with the distance requirements set by the London Plan for older children's offsite play spaces. The existing play facilities in the surrounding area will therefore meet the requirements for older children within the proposed scheme.

The proposed development and the surrounding network of play spaces therefore meets the needs of the future occupiers of this development in accordance with local and regional planning policies.

#### Public Open Space

Policy G4 of the London Plan (2021) states that development proposals should:

- 1) not result in the loss of protected open spaces
- 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency

Policy DMCI 4 (Open Spaces in New Development) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) encourages proposals for major new residential development to make provision for new open space, or enhancements to existing open space and says that proposals that fail to do so will be resisted.

The wider St Andrews Park development proposals include the new 40 acre (16.2 hectare) Dowding Park as well as other smaller areas of public space across the site, therefore the level of public open space provided as part of the wider development is considered to be acceptable and in accordance with policies G4 of the London Plan (2021) and DMCI 4 of the Hillingdon Local Plan: Part 2 (2020).

#### Daylight/sunlight

The National Planning Policy Framework paragraph 123, part C stipulates that "local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site."

Planning Practice Guidance (2019) Paragraph 6 of the section 'Effective use of land' states that "Where a planning application is submitted, local planning authorities will need to consider whether the proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers, as well as assessing whether daylight and sunlight within the development itself will provide satisfactory living conditions for future occupants..."

Paragraph 7 states that "All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings.

The Supplementary Planning Guidance on Housing (March 2016) states "An appropriate degree of flexibility needs to be applied when using the BRE guidelines to assess the daylight and sunlight impacts of new developments on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, larger sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."

The application was supported by an Internal Daylight, Sunlight and Overshadowing Report (P2881 V1 February 2022) which concluded that overall, the performance against the BRE criteria was excellent for a high-density regeneration scheme such as this, with the overwhelming majority of habitable rooms exceeding the relevant daylight and sunlight targets. However the report was generated prior to the new Daylight and Sunlight BRE guidelines being released in June 2022 and as such a Daylight and Sunlight Addendum was requested from the applicant that has been provided (dated 24th November 2022).

Both the original report and the addendum have been reviewed by the Council's independent 3rd party Daylight and Sunlight specialists. The addendum report outlines that 234 of the 256 rooms (91%) of rooms assessed within the proposed block will meet the lux targets set out in the guidance when Living/Kitchen/Dining rooms are assessed against a 150 lux target.

From a review of the results the Council's independent 3rd party Daylight and Sunlight specialists have confirmed this is correct and that these results demonstrate a high level of daylight compliance.

The addendum report also outlines that 82% of units will meet the BRE criteria for sunlight exposure regardless of orientation and that the majority of units failing are north facing. Following their review the Council's specialists have confirmed this is correct.

An overshadowing assessment was not included in the addendum report, as the required overshadowing assessments were provided in the original report based on the 2011 guidance. The original report outlined that the amenity areas assessed would be compliant for overshadowing against the 2011 BRE Criteria. As the proposed massing is the same and the methodology used for overshadowing has not changed with the 2022 guidance there is no requirement for further assessment.

The Council's Daylight and Sunlight specialists have confirmed that they are satisfied with details submitted and that the schemes daylight and sunlight internal amenity is acceptable as per the 2022 guidance.

The proposed scheme is therefore considered to have been developed to maximise natural daylight and sunlight availability to the new dwellings, wherever possible.

## Outlook

Concerns were raised with the proposals as originally submitted due to the proposed residential unit on the north elevation which would have been single aspect and set below ground level. This unit would have had an extremely poor outlook directly onto a blank retaining wall. The drawings also indicated that there would be a hedge around the top of the lightwell, but this would likely have to be railings on safety grounds and would exacerbate the sense of enclosure. The applicants were advised that this unit was unacceptable and an alternative solution such as the unit becoming a duplex dwelling encompassing the first-floor should be investigated so as to provide a much improved outlook.

The submitted revised drawings refs. LEO-BDP-ZZ-00-DR-A-PL-1210 - Proposed Plan - Level LG\_P08 and LEO-BDP-ZZ-00-DR-A-PL-1211 - Proposed Plan - Level 00\_P11) show that the previously proposed northern lower ground floor unit has now been removed and replaced with two 3-bed duplex units across the lower ground and ground floors. This is a welcomed change that results in a better outlook for the residential units.

The separation distances between the habitable room windows of the blocks is 21 metres and acceptable. No single aspect north facing units are proposed. As such the level of outlook proposed for future occupiers is considered to be acceptable.

### **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

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

Policy T6 of the London Plan (2021) states that new residential development should not exceed the maximum parking standards set out in Table 10.3. All residential car parking spaces must provide infrastructure for electric or Ultra Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

Policy DMT 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

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

Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity.

The application proposes 63 car parking spaces for the 90 units, which equals a parking ratio of 0.7 car parking spaces per unit. 7 of the car parking spaces would be accessible spaces, which is 10% of the total. In terms of cycle parking 90 long stay spaces are proposed, including 10 spaces for larger cycles. In addition, 5 motorcycle parking spaces would be provided. The level of parking proposed accords with the details approved as part the outline consent as secured by Condition 7 and is therefore deemed to be acceptable.

Under the outline consent a contribution of £8,000 towards Highways Improvements was secured along with the requirement for a Travel Plan with £20,000 bond.

The Council's Highways Officer has reviewed the details submitted as part of the reserved matters application and requested that dropped kerbs and tactile paving is provided on the footways either side of Burton Road and Churchill Road entrances. Within the site double yellow lines should be provided at each of these access roads. This is to keep these areas free of parked cars which would otherwise obscure sight lines and hinder refuse vehicle access to the collection points as well as emergency service access.

Following discussions with the applicant dropped kerbs and tactile paving are now provided as requested and double yellow lines introduced (revised drawings refs LEO-BDP-ZZ-00-DR-A-PL-1210 Rev P08 and LEO-BDP-ZZ-00-DR-A-PL-1211 Rev P11). Full details of hard surfacing materials are required as part of the discharge of Condition 7 on the outline permission.

The Council's Highways Officer requested that the doors to the Core 1 and Core 2 Cycle storage should open inwards and the scheme has been amended to incorporate this request.

To protect pedestrians using the ramp to access the lower ground level parking, the Highways Officer requested that 1.5m wide coloured surfacing should be provided with pedestrian markings on the ramp to indicate it is where pedestrians should walk. These details were provided to the applicant who has responded to clarify that the ramp on the southern side is provided for vehicle access and the pedestrian access to the lower ground parking is provided via the cores. Pedestrian use of the ramp is not intended to be encouraged for safety reasons, and as a result, they considered that provision of pedestrian markings would encourage pedestrian use of this ramp. Furthermore, access to the car park via the ramp will be controlled via a roller shutter door and therefore it would not be a key route for pedestrians. Pedestrian access is provided from the street via surface level entrances at the main cores, and residents or other pedestrians can enter and exit the car park through the main residential cores. The Council's Highways Officer has confirmed that they accept this response and raise no more objections to the proposals.

As such the proposals are now deemed to accord with Paragraph 111 of the NPPF (2021), Policy T6 of the London Plan (2021) and Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

## **7.11 Urban design, access and security**

### **CRIME PREVENTION**

Policy D11 of the London Plan (2021) requires development proposals to contribute to the minimisation of potential physical risks and include measures to deter crime and anti social behaviour.

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

- i) providing entrances in visible, safe and accessible locations;

- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

The proposed development was reviewed by the Metropolitan Police Secure by Design Officer at outline stage and the development is considered to adhere to the principals of Secure by Design and no objections have been raised.

In addition, Condition 9 of the outline planning permission requires full details of security measures to achieve the Secured by Design accreditation to be submitted prior to occupation of the development.

#### **7.12 Disabled access**

Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design. They should:

- 1) be designed taking into account London's diverse population;
- 2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
- 3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
- 4) be able to be entered, used and exited safely, easily and with dignity for all; and
- 5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Policy D7 of the London Plan (2021) states:

A) To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:

- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

Condition 11 of the outline consent requires that 10% of the units shall meet the standards for M4(3) 'wheelchair user dwellings' and the remainder shall meet the standards for M4(2) 'Accessible and adaptable dwellings' as set out in Approved Document M to the Building Regulations (2015).

The Council's Access Officer has reviewed the proposals and requested that additional parking spaces be provided for the accessible units so that each of the 9 units would have its own accessible space. However, as per the outline consent Condition 7, the proposed scheme is required to provide 10% of the parking spaces as accessible, which the submission is in accordance with (7 out of the 63 approved spaces).

In addition to complying with the requirements of the conditions under the outline consent, the proposed 7 accessible spaces for a 90-unit development exceed the requirements of London Plan (2021) Policy T6.1(g). Policy T6.1(g) states that 3% of overall dwellings should have designated disabled parking bays from the outset and it should be

demonstrated how an additional 7% provision could be provided for in the future on request. The proposed development provides 8% provision of designated disable parking bays when compared to the overall unit number (90 units) and therefore exceeds the requirement to provide 3% provision from the outset.

The applicant has confirmed that there is potential to provide additional designated disabled parking bays in the future if required; a matter which can be appropriately dealt with when seeking to discharging Condition 8 of the outline consent which requires the submission of a Parking Allocation Scheme. The allocation of accessible parking bays would be based on residential demand in line with London Plan (2021) Policy T6.1(g). 10% provision based on unit nos. would result in a loss of no. 2 parking bays, which would reduce the overall parking ration below the requirement set out by Condition 7.

The Council's Access Officer has also requested that accessible housing should be interspersed throughout the buildings and across all types and tenures, noting that one bed units are of little use to most wheelchair users. Policy D7 of the London Plan (2021) notes that the provision of accessible housing is to "provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children". The proposals provide 9 no. 2 bedroom units as M4(3) wheelchair accessible; i.e. 10% of the overall unit number. No one-bedroom accessible units are proposed in direct response to the feedback received at pre-application stage. The Access Officer's request to provide three-bedroom accessible units was put to the applicant who confirmed that the provision of three-bedroom wheelchair accessible units would result in an overall decrease of three bedroom units within the scheme within the constraints of the consented envelope. This would be in direct conflict with the feedback received from the Council's Policy Officer who is seeking to maximise the provision of three bedroom units for families.

Unit Type 2A has been designed so that they can be delivered without structural alteration as a 2 bed 4 person M4(2) unit or a 2 bed 3 person M4(3) Wheelchair User Home. 9 of the 13no. proposed Type 2A units are proposed to be delivered as Part M4(3) Wheelchair User Homes in accordance with Condition 11 of the outline consent. The location of the part M4(3) units is required to be confirmed prior to occupation in accordance with Condition 11

The Council's Access Officer has accepted the above and therefore raises no objections to the proposals. The proposals are therefore deemed to accord with Policies D5 and D7 of the London Plan (2021).

### **7.13 Provision of affordable & special needs housing**

#### **AFFORDABLE HOUSING PROVISION**

Policy H4 of the London Plan (2021) sets out a strategic target for 50 percent of all new homes delivered across London to be genuinely affordable and that major developments which trigger affordable housing requirements should be subject to the threshold approach (Policy H5).

Policy H2 of the Hillingdon Local Plan: Part 1 (2012) states that housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.

Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020) states that 50% affordable housing should be delivered with the tenure split 70% Social/Affordable Rent and 30% Intermediate. In exceptional circumstances, where on-site provision of affordable housing cannot be delivered and as a last resort, a financial contribution will be required to provide off-site affordable housing on other sites which may be more appropriate or beneficial in meeting the Borough's identified affordable housing needs.

The Mayor's Affordable Housing and Viability SPG and Policy H8 of the London Plan set out that as well as ensuring no net loss of affordable homes, all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.

The NPPF directs that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

As noted in this report, through the outline planning consent for the wider St Andrew's Park development the site has existing planning consent for 27 town houses, which is part of the Phase known as 'Town Centre West'. As the affordable housing provision relating to these 27 no. townhouses within the Town Centre West Reserved Matters application were incorporated into the apartment buildings to the north, the provision of affordable housing within the outline consent for this site area was calculated on the basis of the uplift of 63 units (i.e. 90 units minus the 27 units who's affordable housing contribution is provided elsewhere).

However, as the Town Centre West Phase was not under construction at the time the outline consent for this site was granted, in order to safeguard maximum delivery of affordable housing, two proposals for the provision of affordable housing were secured by the legal agreement:

1. 35% delivery of the uplifted housing numbers subject to the Town Centre West Phase being under construction prior to occupation of this development, OR
2. 35% on-site delivery within the extent of this outline planning application.

The scheme as proposed would provide 35% affordable housing on the uplift above the TCW proposals (calculated by habitable room) with a 30:70 split between affordable rented and intermediate products. The exact location, layout, tenure and unit split of the affordable housing will be confirmed as part of the discharge of the first obligation of Schedule 1 of the Section 106 Agreement of the 2019 outline permission ref. 585/APP/2017/2819.

The application will deliver policy compliant levels of affordable housing, secured via the legal agreement. Therefore, the affordable housing provision is deemed acceptable and in accordance with Policy H4 and H5 of the London Plan (2021), Policy H2 of the Hillingdon Local Plan: Part 1 (2012), Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020)

The Mayor's Affordable Housing and Viability SPG and the NPPF.

#### **7.14 Trees, landscaping and Ecology**

Policy EM4 (Open Space and Informal Recreation) of the Local Plan: Part 1 - Strategic Policies (2012) says that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing

spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities. The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states (amongst other things) that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit and that development proposals will be required to provide a landscape scheme. The policy also seeks to protect existing trees through tree root protection areas and an arboricultural method statement where appropriate. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

The Council's Landscape Architect has reviewed the proposed scheme and provided detailed comments, recommending the need for defensible space around ground floor (ground level and podium level) windows. The use of structural planting (hedges) is specified within the proposals. These should be located on the outside of any railings / fences and maintained by the estate/ landscape management company, to ensure that they are consistently managed and maintained across the scheme. These details can be secured through Condition 7 of the outline consent. An informative is recommended to be attached to any grant of planning consent to remind the applicant of the need to provide these details.

The applicant has provided a revised Tree Removal / Retention Plan ref. 268-TS-02 Rev P2 that shows that an additional tree needs to be removed from the site tree no. T49 when compared to the details approved under the 2019 outline consent. This tree needs to be removed as the submitted Tree Survey recommended the tree is felled to ground on the basis as its structural condition has significant defects that can't be remediated.

The Council's Arboricultural Manager visited the site to assess the trees in question and confirmed their poor state of repair, with their trunks showing significant levels of decay. The loss of Trees T40 and T49 is therefore considered acceptable.

The revised Landscape Masterplan (ref. 2683-LA-03 LEOMONS GMP\_RevP7) includes an additional 5no. trees (3no. in location of T49 and 2no. to the south of Block B) to replace T49. The proposed replacement trees can be secured through Condition 7 of the outline consent. An informative is recommended to be attached to any grant of planning consent to remind the applicant of the need to provide these additional tree details. The additional trees also ensure the originally submitted UGF score of 0.36 is achieved.

As such the proposed landscaping is deemed to be acceptable and in accordance with

Policy EM4 (Open Space and Informal Recreation) of the Local Plan: Part 1 - Strategic Policies (2012) and Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## **7.15 Sustainable waste management**

### WASTE STRATEGY

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) states that development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

This is supported by Policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012).

Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan (2021) states:

A Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

- 1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
- 2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products
- 3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- 4) meet or exceed the municipal waste recycling target of 65 per cent by 2030<sup>163</sup>
- 5) meet or exceed the targets for each of the following waste and material streams:
  - a) construction and demolition - 95 per cent reuse/recycling/recovery
  - b) excavation - 95 per cent beneficial use<sup>164</sup>
- 6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

The Council's Waste Strategy Officer has reviewed the submission and following the receipt of further details, including proposed dropped kerbs, has confirmed that the details are acceptable. As such the proposals are deemed to be in accordance with Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan (2021), Policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

## **7.16 Renewable energy / Sustainability**

Policy SI 2 of the London Plan (2021) requires major developments to be net zero-carbon. Major development proposals are expected to include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided that an alternative proposal is identified and delivery is certain.

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states

that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (March 2016).

Policies DMEI 1, DMEI 2 and DMEI 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) relate to reducing carbon emissions (and decentralising energy) and require that all developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

The outline planning consent for the wider St Andrew's Park development as approved under application reference 585/APP/2009/2752 and amended under planning permission reference 585/APP/2015/848 proposed the provision of 'exemplar' Code for Sustainable Homes Level 6 dwellings within the location of the current application site. Whilst the majority of the wider site is being brought forward in line with the site wide consent the outline consent superseded the outline planning permission.

The outline application was supported by a Sustainability and Energy Statement that was reviewed by the Council's Sustainability Officer who raised a concern with the proposed scheme as it failed to provide an exemplar level of development in terms of energy and sustainability. Given this standard was required as part of the outline consent, and the rest of that scheme was coming forward, it was deemed appropriate for this phase to meet that same standard of sustainability. The applicant was informed of these concerns and entered discussions with the Council's Sustainability Officer. An addendum was subsequently submitted to the original Energy Strategy (Addendum dated April 2018) which was reviewed by the Council's Sustainability Officer and confirmed as acceptable. The developer confirmed through the amended document that the scheme would be exemplar through being 'on-site' zero carbon. The addendum was included within the approved documents list when the outline application was approved in order to secure the level of sustainability required.

As originally submitted the RMA application provided little detail of how it would be in accordance with the Energy Strategy Addendum. When this matter was raised with the applicant they provided additional details in the form of a supporting letter dated 26th April 2022 that included CO2 emissions calculations. The proposed solution to achieve zero carbon on site is the extensive use of photovoltaics (PVs) and as such these details were requested. The applicant responded to say that at present it is not possible to provide full details of the PVs, though they have set aside sufficient space within the roofs of the development (drawing reference LEO-BDP-ZZ-05-DR-A-PL-1216 Rev P02) and confirmed that the PVs will not be visible from the streetscene. It has therefore been agreed with the applicant and the Council's Sustainability Officer that should the application be approved, a condition will be attached to the consent requiring full details of the PVs to be submitted and approved.

It should be noted that should the proposed PVs fail to deliver net zero carbon on this site then a s73 application would be required to amend the Energy Strategy. Such a proposal is highly unlikely to be considered favourably given the initial commitments set out.

Subject to the PV condition, the application is deemed to be in accordance with Policy SI 2 of the London Plan (2021), Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies DMEI 1, DMEI 2 and DMEI 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## **7.17 Flooding or Drainage Issues**

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

The Council's Flood and Water Management Officer has reviewed the proposals and raised some concerns with regards to how the landscaping will integrate with the required surface water management including any sustainable drainage measures within the site. It is also not indicated in the landscaping plan how the amenity space has been designed to be dual purpose, and what above ground solutions are proposed to control water other than some indicated permeable paving.

These comments were provided to the applicant who has advised that the following sustainable drainage techniques for the surface water drainage of the Land East of Mons Block are proposed:

- Source control - the Landscape Strategy is proposing the use of 350 m<sup>2</sup> of intensive green roof/vegetation.
- Pervious pavements to allow rainwater run-off to infiltrate below finished development surfaces and provide storage if needed.

Condition 15 attached to the outline consent ref. 585/APP/2017/2819 requires the full details of a drainage strategy, detailing any on and/or off-site drainage works, including surface water drainage, to be submitted and approved by the local planning authority. The submitted Landscape Masterplan provides sufficient flexibility to incorporate sustainable drainage techniques and the detailed landscape arrangement will be secured via the future discharge for Condition 7.

The applicant's have advised that a detailed landscaping design and detailed Drainage Strategy will be developed accordingly to address the requirements of Conditions 7 and Condition 15 respectively. As such the proposed details are considered to be acceptable at this stage, noting that further details are required to be submitted and approved.

## **7.18 Noise or Air Quality Issues**

### **AIR QUALITY**

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy SI 1 of the London Plan (2021) further supports this.

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

- A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.
- B) Development proposals should, as a minimum:

- i) be at least "air quality neutral";
- ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
- iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

The Council's Environmental Protection Unit reviewed the submitted details at outline stage and confirmed that they had no objections to the proposals. No air quality issues were raised and no contribution towards air quality was deemed to be required to be secured via the outline s106 agreement. It should be noted that air quality contributions were secured as part of the site wide planning consent for St Andrews.

#### **7.19 Comments on Public Consultations**

Where comments relate to material planning considerations they have been considered within the body of this report.

#### **7.20 Planning obligations**

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

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

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

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

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

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

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

It should be noted that this is a reserved matters application and the relevant obligations to mitigate the impact were secured under the outline permission. The Heads of Terms agreed under the outline consent reference 585/APP/2017/2819 were:

1. Contribution of £8,000 towards Highways Improvements.
2. Travel Plan (with £20,000 bond)
3. Affordable Housing on site (tenure delivery 70% social rent, 30% intermediate) (35% of the uplift calculated by habitable room if the 'Town Centre West' Phase is delivered or 35% of all units consented under this application).
4. Construction Training: Training Costs: £2500 for every £1m build cost + Coordinator Costs: 28/160 x £71,675
5. Project Management & Monitoring Fee: 5% of total cash contributions.

## COMMUNITY INFRASTRUCTURE LEVY (CIL)

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

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

- Residential Dwelling Houses (C3) - £95 per square metre

### **7.21 Expediency of enforcement action**

None

### **7.22 Other Issues**

#### CONTAMINATED LAND

Paragraph 183 of the NPPF (2021) states that planning policies and decisions should ensure that:

- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
- b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

Paragraph 184 of the NPPF (2021) states that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

Policy DME1 12 of the Hillingdon Local Plan: Part 2 (2020) states that:

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

health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

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

Policy DMEI 13 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Development proposals that include the importation of waste material (inert or otherwise) must be accompanied by a monitoring plan that includes:

- i) the amount and types of material to be imported;
- ii) the timetable for disposal;
- iii) onsite precautions to be taken to ensure only authorised vehicles and waste will be allowed on to site; and
- iv) methods for reviewing and reporting on the progress of the disposal to the Local Planning Authority.

B) On commencement of the disposal operation the applicant will provide a written report in accordance with A) iv) above that provides details of:

- i) the types and quantities of waste that have been imported, including carrier notices where appropriate;
- ii) the source of the waste imported to the site;
- iii) appropriate details of the company/companies importing the material; and
- iv) updates in accordance with A) iv) pertaining to the progress of material importation and disposal in compliance with the approved plans.

C) Where assurances cannot be given that the appropriate protection and safeguards can be implemented, then the Council will expect the applicant to provide contingency plans including providing security bonds (through legal agreements) to ensure any subsequent harm can be remediated and the site made good.

D) Proposals that include the importation of waste materials (inert or otherwise) that are not accompanied by the appropriate level of controls or safeguards will not be supported.

The outline consent reference 585/APP/2017/2819 included Condition 16 which relates to contamination. As this condition remains part of the consented proposals, the scheme is considered in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies DMEI 12 and DMEI 13 of the Hillingdon Local Plan: Part 2 (2020).

#### **FIRE SAFETY**

Policy D12 Fire safety of the London Plan states:

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

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

and use of the development.

B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

In accordance with the London Plan (2021) Policy D12, a Fire Statement has been submitted. The London Fire Brigade (LFB) have been consulted on the proposals and have raised no objections to the application.

## **8. Observations of the Borough Solicitor**

### General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The

obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

#### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

#### **9. Observations of the Director of Finance**

Not applicable

#### **10. CONCLUSION**

This application is for reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19. The outline application granted consent for means of site access from the central access road, now known as Burton Road, within St Andrews and for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works. Internal access, layout, scale, appearance and landscaping were reserved for subsequent approval, for which this application seeks consent.

The scale and massing are in accordance with the outline consent and the design of the proposals is considered to be appropriate. The application proposes 90 dwellings, including 28 no. 1 bedroom units (31%), 48 no. 2 bedroom units (53%) and 14 no. 3 bedroom units (16%). The proposed mix represents a minor conflict with Policy DMH 2 at 15.6% family units. However, on balance, the scheme is delivering 35% affordable housing that would be policy and tenure compliant. If the quantum of family units were higher, the scheme would be unable to deliver the same level of affordable housing.

The application site is also now within Uxbridge Town Centre as designated by the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). This is an area where a higher proportion of one and two bedroom units are considered to be acceptable as set out by Policy H10 of the London Plan (2021). The proposed development would provide 14 x 3 bedroom dwellings, which is an increase on the 12no. originally proposed at

outline stage. The Council's Policy Team Manager raises no objection to the housing mix proposed.

The Reserved Matters application is in accordance with the outline consent reference 585/APP/2017/2819 and is deemed to essentially accord with relevant local and national policies while delivering a substantial number of new dwellings.

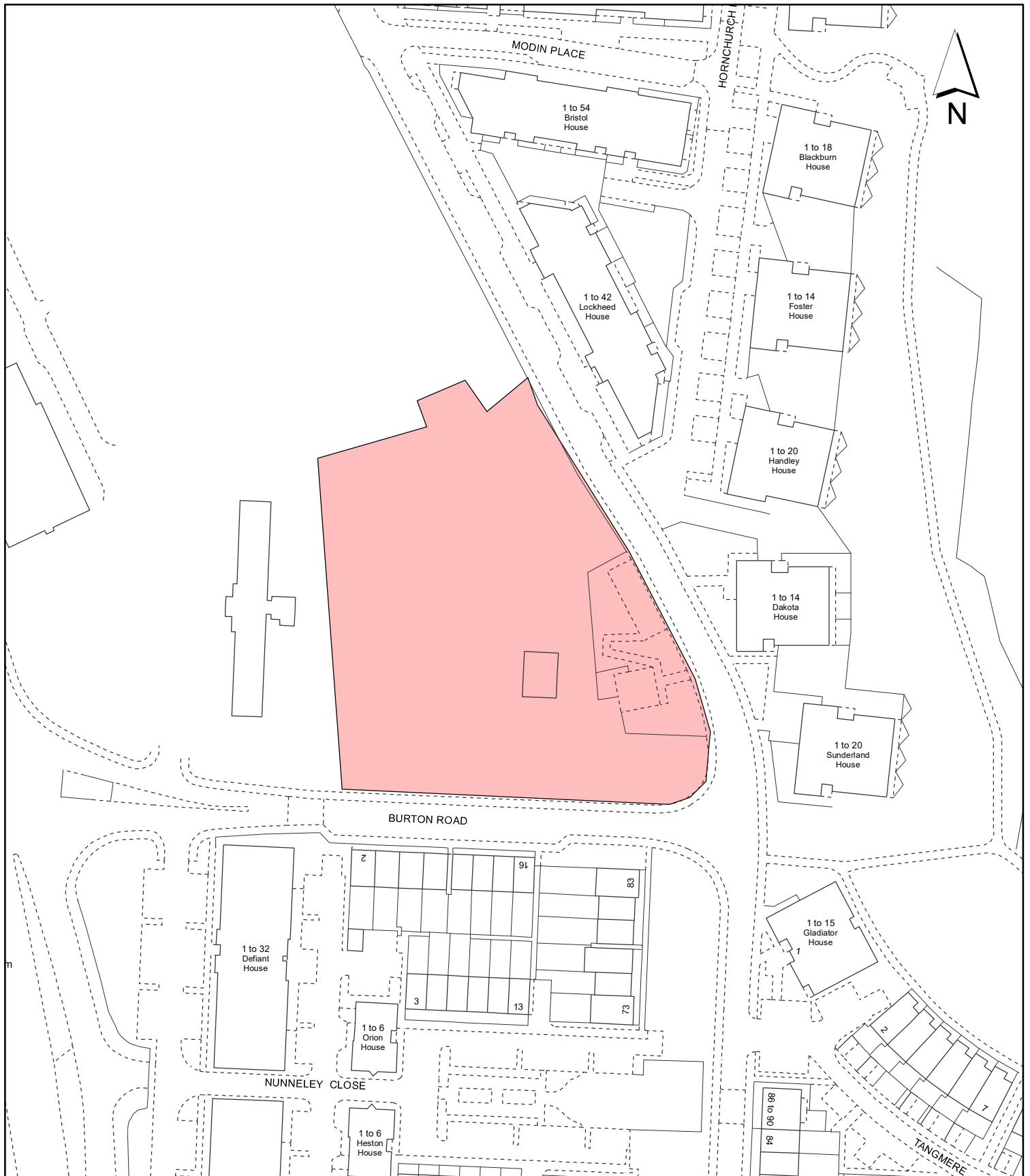
As such the application is recommended for approval.

#### **11. Reference Documents**

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)  
The London Plan (March 2021)  
National Planning Policy Framework (NPPF) (July 2021)  
National Planning Practice Guidance (NPPG)

**Contact Officer:** Ed Laughton

**Telephone No:** 01895 250230



**Notes:**

 Site boundary

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Site Address:

**Land East of Mons**

Planning Application Ref:  
**585/APP/2022/665**

Planning Committee:  
**Major Page 57**

Scale:  
**1:1,250**

Date:  
**February 2023**

**LONDON BOROUGH OF HILLINGDON**  
**Residents Services**  
**Planning Section**

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**HILLINGDON**  
 LONDON

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## Report of the Interim Director of Planning, Regeneration & Public Realm

**Address** SHURGARD HOUSE, WESTMOUNT CENTRE UXBRIDGE ROAD HAYES

**Development:** Partial demolition and extension to existing building to provide additional self-storage floorspace (Use Class B8) with associated new car and cycle parking, refuse storage, landscaping and other associated works ancillary to the development.

**LBH Ref Nos:** 49467/APP/2022/2801

**Drawing Nos:** 21065GA-D-010B  
21065GA-D-011B  
21065GA-D-012B  
21065GA-D-013B  
21065GA-D-014B  
21065GA-D-015A  
SH 103.21 SL-01  
21065GA-10-001A  
21065GA-10-002A  
20165GA-10-003C  
21065GA-10-00E  
21065GA-10-009A  
21065GA-10-010B  
21065GA-D-001E  
21065GA-D-003A  
21065GA-D-004B  
21065GA-D-005A  
21065GA-D-007A  
WLA/2107/03/TSP (Rev. A)  
WLA/2107/03/TCP (Rev. A)  
Transport Statement (February 2023)  
Travel Plan (February 2023)  
Drainage Strategy (20-01-23)  
Technical Design Note (26 January 2023)  
Daylight and Sunlight Report (04-07-22)  
Phase I Geo-Environmental Assessment Report (August 2022)  
Design and Access Statement (Rev. B)  
Air Quality Assessment (Ref: 2203260-03)  
Noise Impact Assessment (Ref: 2203260-04)  
Planning Statement (23-08-22)  
Water Cycle Strategy (22-06-22)  
Preliminary Ecological Appraisal (July 2022)  
Biodiversity Impact Assessment (July 2022)  
Tree Report (03-08-22)  
Heritage Impact Assessment (July 2022)

**Date Plans Received:** 07/09/2022      **Date(s) of Amendment(s):**

**Date Application Valid:** 07/10/2022

## 1. SUMMARY

The application site is an existing self-storage facility comprised of a large central building and associated single-storey lock-ups, to the north of Uxbridge Road near the boundary with the London Borough of Ealing. The proposal seeks to demolish some of the single-storey lock-ups to the south of the main building, and erect an extension to the main building of the same height extending 28.5 metres to the south, resulting in an overall uplift of 3980 sqm (assuming five floors internally).

The continuation and expansion of an existing B8 storage facility is considered to be acceptable in principle, and the proposal, whilst large, would not be harmful to the wider character of the area or appearance of the streetscene. The existing parking area could likely accommodate the additional demand from the increased floorspace, and the maximum London Plan parking standards have been applied in any case resulting in one additional space to be provided, for a total of 20 on-site car parking spaces.

There would be no impact to the amenity of neighbouring residential properties, either in terms of daylight and sunlight impacts, or from an increased sense of enclosure or loss of privacy, and the supporting information demonstrates that there would be negligible impacts to noise when background levels are considered.

Overall, the proposal is considered acceptable and generally complies with the London Plan and Hillingdon Local Plan, and is recommended for approval on this basis, subject to the conditions and obligations listed in the report.

## 2. RECOMMENDATION

**That delegated powers be given to the Director of Planning, Regeneration and Public Realm to grant planning permission, subject to the following:**

**A) That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:**

**i) A full and detailed Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;**

**ii) A full Commercial Travel Plan, including a Low Emission Strategy, shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured:**

**iii) A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge Condition 5, with the offset calculation based on £95 per tonne of CO2 over a 30 year period;**

**iv) Air Quality Mitigation Cost of £55,035 to be used by the Council to fund measures to reduce poor air quality within the borough; and**

**v) A Project Monitoring and Management Fee, equalling 5% of the total financial contributions paid under this agreement.**

**B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.**

**C) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.**

**D) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Director of Planning, Regeneration and Public Realm), delegated authority be given to the Director of Planning, Regeneration and Public Realm to refuse planning permission for the following reason:**

**'The applicant has failed to secure the necessary legal obligations associated with the proposed development and provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Construction and Employment Training, Travel Planning, Carbon Offsetting, Air Quality Offsetting and Project Monitoring). The scheme therefore conflicts with Policy DF1 of the London Plan (2021), Policy DMCI 7 of the Hillingdon Local Plan Part 2 (2020) and the Planning Obligations Supplementary Planning Document (2014).'**

**E) That if the application is approved, the following conditions be imposed:**

**1            A1            Time Limit**

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

**REASON**

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

**2            COM4            Accordance with Approved Plans**

The development hereby approved shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

21065GA-10-001A,  
21065GA-10-002A,  
20165GA-10-003C,  
21065GA-10-006,  
21065GA-10-009A,  
21065GA-10-010B,  
21065GA-D-001E,  
21065GA-D-003A,  
21065GA-D-004B,  
21065GA-D-005A,  
21065GA-D-007A,  
21065GA-D-010B,  
21065GA-D-011B,  
21065GA-D-012B,  
21065GA-D-013B,  
21065GA-D-014B,  
21065GA-D-015A,  
SH 103.21 SL-01,  
WLA/2107/03/TSP (Rev. A), and  
WLA/2107/03/TCP (Rev. A).

And the submitted documents, titled:

Transport Statement (February 2023), Travel Plan (February 2023), Drainage Strategy (20-01-23), Technical Design Note (26 January 2023), Daylight and Sunlight Report (04-07-22), Phase I Geo-Environmental Assessment Report (August 2022), Design and Access Statement (Rev. B), Air Quality Assessment (Ref: 2203260-03), Noise Impact Assessment (Ref: 2203260-04), Planning Statement (23-08-22), Water Cycle Strategy (22-06-22), Preliminary Ecological Appraisal (July 2022), Biodiversity Impact Assessment (July 2022), Tree Report (03-08-22), and Heritage Impact Assessment (July 2022).

#### REASON

In the interests of proper planning, and to ensure the approved development complies with the provisions of the London Plan (2021), the Hillingdon Local Plan: Strategic Policies (2012), and the Hillingdon Local Plan: Development Management Policies (2020).

### **3 OM19 Construction Management Plan**

Prior to the commencement of the development hereby approved (including demolition), a Demolition and Construction Logistics Plan (DLP/CLP) and a Demolition and Construction Management Plan (DMP/CMP) shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Canal and River Trust, to minimise impacts to the local highway network, to control noise, vibration and air pollutants generated as a result of the construction process, and to avoid or mitigate construction impacts on species and habitats, particularly to the adjacent Grand Union Canal Site of Importance for Nature Conservation (SINC). These documents shall be prepared in accordance with the London Freight Plan, 'The control of dust and emissions from construction and demolition' Supplementary Planning Guidance, BRE Pollution Control Guides 'Controlling particles and noise pollution from construction sites' and 'Controlling particles, vapour and noise pollution from construction sites'.

The DLP/CLP and DMP/CMP shall include details of (but shall not necessarily be limited to):

- (i) a programme of works, including hours of construction;
- (ii) the measures for traffic management and encouragement of sustainable modes of transport for workers, including prohibition of construction vehicles parking on the local highway network within the vicinity of the application site;
- (iii) the haulage routes and details of a vehicle booking system including use of a banksman (if applicable), ensuring construction deliveries are received outside peak hours;
- (iv) any closures of public routes and diversions, demonstrating how time spent closed to the public has been minimised;
- (v) the provision of secured restricted access as the sole means of entry to site for cyclists along with a secured turnstile entrance for pedestrians;
- (vi) a site plan identifying the location of the site entrance, exit, visibility zones, wheel washing, hard standing, hoarding (distinguishing between solid hoarding and other barriers such as heras and monarflex sheeting), stock piles, dust suppression, location of water supplies and location of nearest neighbouring receptors;
- (vii) the loading, unloading and storage of equipment, plant, fuel, oil, materials and chemicals;
- (viii) measures to ensure no materials, machinery, vehicles or works will encroach on the adjacent Grand Union Canal Site of Importance for Nature Conservation (SINC).
- (ix) the means to prevent deposition of mud on the highway and chemical and/or fuel run-off from into nearby watercourse(s);

(x) a dust risk assessment, including means to monitor and control dust, noise and vibrations, following the published guidance by The Institute of Air Quality Management (IAQM) on how to assess impacts of emissions of dust from demolition and construction sites.

(xi) the likely noise levels to be generated from plant and construction works and the precautions set out to eliminate or reduce noise levels where the operational risk levels illustrated within The Control of Noise at Work Regulations 2005 could be exceeded;

(xii) confirmation that a mobile crusher will/won't be used on site and if so, a copy of the permit and intended dates of operation;

(xiii) confirmation of all Non-Road Mobile Machinery (NRMM) to be used, or a statement confirming that NRMM will not be used. All Non-Road Mobile Machinery (NRMM) and plant to be used on site of net power between 37kW and 560 kW shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" and must be registered at <http://nrmm.london/>;

(xiv) details of cranes and other tall construction equipment (including the details of obstacle lighting);

(xv) an asbestos survey and management plan; and

(xvi) the arrangement for monitoring and responding to complaints relating to demolition and construction.

and, for the avoidance of doubt:

(i) all Heavy Goods Vehicles associated with the development shall comply with the Direct Vision Standard, with a rating of 3 stars (or more).

(ii) all deliveries to the site, particularly Heavy Goods Vehicles, shall be made using vehicles which have a Class VI mirror fitted in accordance with EU directive 2007/38/EC;

The development hereby approved shall be implemented in accordance with the approved DLP/CLP and DMP/CMP.

#### REASON

To ensure that the proposed development does not interfere with the free flow of traffic and conditions of safety on the public highway, to ensure the development process does not have a significant adverse impact on the amenities of nearby residential properties and to protect features of biodiversity value, in accordance with Policies DMT 1, DMT 2, DMEI 7 and DMEI 14 of the Hillingdon Local Plan: Development Management Policies (2020) and Policies D14, SI 1, T4, T7, G5 and G7 of the London Plan (2021). Also, to ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (2020).

#### **4 COM30 Intrusive Ground Investigation and Soil Gas Survey**

(A) Prior to the commencement of the development hereby approved (including demolition), the applicant shall submit details of an intrusive ground investigation including a soil gas survey in areas of the proposed development, to be approved in writing by the local planning authority. Some of the soil gas tests within the survey shall be conducted below the proposed footprint of any new building.

(B) If unacceptable concentrations hazardous soil gas are detected, the applicant shall submit details of gas protection measures to the local planning authority for approval in writing, and install said measures in accordance with the approved details to prevent gas

ingress to any buildings on the development site.

(C) The installed gas protection system shall be validated and verified by suitably qualified person/s, and a Verification Report shall be submitted to, and approved in writing by the Local Planning Authority to confirm the works have been implemented prior to first use of the development hereby approved.

REASON: The LPA has received details of a phase 1 study which suggest the development site may have Made Ground present. Made Ground could introduce risks associated with possible production and migration of hazardous ground gases into confined spaces within the proposed new structures. An intrusive investigation and soil gas survey is therefore required to clarify that there are no significant soil contamination and/or gas issues which may impact the new development site, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

#### **5 SUS1 Updated Energy Strategy**

Prior to commencement of the development hereby approved (excluding demolition), an Updated Energy Strategy shall be submitted to, and approved in writing by, the local planning authority. The Updated Energy Strategy shall include an assessment of the annual baseline regulated energy demand (kwhr) as per 2021 Building Regulations (or subsequent amendments) and associated carbon emissions (kgCO<sub>2</sub> and tCO<sub>2</sub>), and shall then set out the measures and technology required to achieve, as far as practicable, the zero carbon and energy efficiency standards of the London Plan and an on-site reduction equal to or greater than 35% in the CO<sub>2</sub> associated with the baseline regulated energy demand.

The Updated Energy Strategy shall clearly define the 'be lean', 'be clean' and 'be green' measures to demonstrate that the development will meet as far as practicable the zero carbon standards of the London Plan and the minimum standards for onsite energy efficiency. Carbon-saving measures must be sufficiently evidenced with corresponding details and specifications including the location of low and zero carbon technology (i.e. roof plans showing the inclusion of PV panels), and the Updated Energy Strategy must clearly set out any annual shortfall (tCO<sub>2</sub>) of the zero-carbon requirement.

The Updated Energy Strategy shall also provide details of the 'be seen' recording and reporting measures and demonstrate that the 'onsite saving' is being achieved in perpetuity.

The development must proceed in accordance with the approved Updated Energy Strategy.

#### **REASON**

In order to deliver the maximum on-site carbon savings in accordance with Policies SI 2 and SI 3 of the London Plan and the GLA's Energy Assessment Guidance (2020).

#### **6 COM15 Sustainable Water Management**

Prior to commencement of the development hereby approved (excluding demolition), a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how water is managed and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage:

i. Surface water discharge - the submitted drainage strategy must confirm the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided. Any proposal that includes an off-site connection through a private sewer network should provide details of the condition and ownership of the entire drainage route to a public sewer or ordinary watercourse.

ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that provide wider biodiversity, water quality and amenity benefits.

iii. Infiltration drainage - where infiltration drainage is proposed, a ground investigation must be provided to establish the level of groundwater on the site; to demonstrate the suitability of infiltration techniques proposed on the site by providing the results of infiltration testing in line with BRE Digest 365; and to confirm the suitability of infiltration drainage based on any encountered ground contamination.

iv. Runoff rates - surface water discharge from the site must be no greater than greenfield runoff rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Any increases above greenfield rates must be adequately justified and may be subject to developer contributions.

v. Drainage calculations - include calculations to demonstrate the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100 plus 40% climate change rainfall event. The proposed attenuation volume of each feature should be clarified, and these should be incorporated into the MicroDrainage calculations and there should be no flooding in the 1 in 30-year event.

vi. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and include details on flow paths, depths and velocities. The location and extent of the flooding for the 1 in 100-year event should be marked on a drawing. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.

ii. Include details of the necessary inspection regimes, maintenance frequencies and responsible authority (Private Management Company, homeowner, etc.).

iii. Where managed flooding of the ground surface is proposed, the plan should include the appropriate actions for those areas and document the actions required to ensure the safety of the users of the site during a rainfall event.

c) Minimise water use.

i. incorporate water saving measures and equipment.

ii. provide details of how rain and/or grey water will be recycled and reused in the development.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

#### REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding in accordance with Policy EM6 of the Hillingdon Local Plan Part (2012), Policy DMEI 10 of the Local Plan Part 2 (2020) and Policy SI 12 of the London Plan (2021).

### **7 OM14 Fire Strategy**

(A) Prior to above ground works (excluding demolition), the principles of a Fire Statement shall be submitted to, and approved in writing by, the Local Planning Authority. The statement shall detail how the development will function in terms of:

- (i) the building's construction: methods, products and materials used, including manufacturers' details
- (ii) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- (iii) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- (iv) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- (v) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- (vi) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

B) Prior to first use of the development hereby approved, the final comprehensive Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. This should be accompanied by the Building Control Decision Notice or equivalent. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

#### REASON

To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

### **8 NONSC Artificial Lighting**

Prior to above ground works (excluding demolition), an external lighting scheme shall be submitted and approved in writing by the Local Planning Authority in consultation with the Canal and River Trust, which shall include measures to ensure that external lights are automatically turned off when the buildings are not in use.

The lighting scheme shall be designed to protect the biodiversity along the Grand Union Canal, and the lighting should use deflectors, be angled downwards, and use a warm white spectrum for all the proposed lights bordering the canal, with light spillage of less than 5 lux into the canal corridor.

The lighting scheme shall be implemented in accordance with the approved details and remain as such for the lifetime of the development.

#### REASON

To reduce the impact of artificial lighting on the surrounding area, specifically the adjacent Grand Union Canal, in relation to foraging species and light spillage, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012).

### **9 NONSC Pedestrian Vehicle Delineation**

Prior to above ground works (excluding demolition), a site wide plan clearly showing the delineated spaces for pedestrians, vehicles and cyclists within the site, including any measures to ensure the site is safe, convenient and easy to use by all, shall be submitted to and approved in writing by, the Local Planning Authority. This plan should identify the key movement routes within the site and demonstrate how pedestrians and vehicles can safely interact, including near the sole access point from Uxbridge Road.

#### REASON

To ensure the site is safe and convenient for all users in accordance with Policies T2 and D5 of the London Plan (2021).

### **10 COM7 Materials**

Prior to above ground works for the development hereby approved (excluding demolition), details of all materials and external surfaces, including fenestration, boundary treatments and balustrades, shall be submitted to, and approved in writing by, the Local Planning Authority.

Details should include information relating to make, product, type, colour and can include photographs and images.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

#### REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies (2020).

### **11 COM9 Landscaping and Ecology**

Prior to above ground works for the development hereby approved (excluding demolition), a scheme of landscaping shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Canal and River Trust. The scheme shall include:

#### A. Details of Soft Landscaping

A.a Planting plans (at not less than a scale of 1:100).

A.b Written specification of planting and cultivation works to be undertaken (with Japanese Rose removed, as this is an invasive species).

A.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate, to include pollution absorbing trees.

A.d Root barriers to protect the structural integrity of the Canal.

A.e Boundary treatments, including litter shields.

A.f Biodiverse Roofs and other features of ecological value.

#### B. Details of Landscape Maintenance

B.a Landscape Maintenance Schedule for a minimum period of 5 years.

B.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

C. Schedule for Implementation.

#### REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the area and provide appropriate cycling provision in accordance with Policies G5, G6 and G7 of the London Plan (2021) Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Development Management Policies (2020).

#### **12 H14 Cycle Stores**

Prior to above ground works for the development hereby approved (excluding demolition), details of 24 long-stay and 12 short-stay covered and secure cycle storage spaces designed in accordance with London Cycling Design Standards, alongside changing facilities, lockers and showers for users of and visitors to the development, shall be submitted to and approved in writing by the Local Planning Authority. The short-stay provision shall include at least 2 cargo-bike spaces. Thereafter, the development shall not be occupied or brought into use until the approved cycling facilities have been implemented in accordance with the approved plan, with the facilities being permanently retained for use by cyclists.

#### REASON

To encourage an uptake in cycling in accordance with Policy T5 of the London Plan (2021).

#### **13 NONSC Delivery and Servicing Plan**

Prior to the first use of the development hereby approved, a Delivery and Servicing Plan, including tracked vehicle movements where necessary, shall be submitted to, and approved in writing by, the Local Planning Authority.

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

#### REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policy T7 of the London Plan (2021) and Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020).

#### **14 A12 Parking Design and Management Plan**

Prior to any above ground works for the development hereby approved (excluding demolition), a Parking Design and Management Plan shall be submitted to, and approved in writing by, the Local Planning Authority. It shall include the following:

(i) The arrangements for all on-site parking, and to include provisions for managing, monitoring, enforcement and review. All on-site parking spaces shall be solely for use by the development hereby approved (e.g. staff, visitors) and shall not be used for any other purpose or leased/sub-let.

(ii) Details of 1 wheelchair accessible space, to be permanently retained within the car parking area.

(iii) Details of 6 active electric vehicle charging points.

(iv) Confirmation that no more than 20 spaces are to be provided on site.

The vehicle parking provision and its management, as outlined in the approved Parking Design and Management Plan, shall be fully implemented as approved prior to the first occupation of the development, and the parking area shall not be used for any other purpose for the lifetime of the development.

**REASON**

To ensure the appropriate operation of the car park in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Development Management Policies (2020) and Policy T6 of the London Plan (2021).

**15 COM26 Noise**

For the lifetime of the development hereby approved, the rating level of noise caused by the operation of development shall be at least 5 dB below the minimum background noise level, or 35 dB(A), whichever is higher, measured 1 metre outside of any window of any existing dwelling, or similarly noise sensitive premises, determined in accordance with the procedures set out in BS4142:2014 Methods for Rating and Assessing Industrial and Commercial Sound.

**REASON**

To ensure the operational development does not have an adverse impact on nearby residential properties in accordance with Policy D14 of the London Plan (2021).

**16 NONSC Imported Materials**

No contaminated soils or other materials shall be imported to the site. All imported soils for ground engineering and/or landscaping purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and a factual and interpretive report of the results of the testing shall be submitted to the Local Planning Authority for its written approval prior to their use on site.

**REASON:** To ensure that users of the development are not subject to any risks from soil contamination, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

**17 COM31 Secured by Design**

The development hereby approved shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No part of the development hereby approved shall be occupied until accreditation has been achieved.

**REASON**

To ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Development Management Policies (2020) and Policy D11 of the London Plan (2021).

**18 OM5 Not a Data Centre**

The uses hereby approved under the B8 use class shall not include operation as a Data Centre.

**REASON**

To ensure that any use as a Data Centre is assessed against development plan policies in place at the time, as they tend to have very high energy demands and much worse impacts on air quality than other B8 uses, and these impacts would likely require assessment against Policies SI1, SI2 and SI3 of the London Plan (2021) and require subsequent mitigation.

**19 COM10 Fire Lift**

The development hereby approved shall include at least one suitably sized fire evacuation lift, suitable to be used to evacuate people who require level access from the building.

**REASON**

In accordance with Policy D5 and D12 of the London Plan.

**20 COM8 Tree Protection Measures**

All trees shown to be retained shall be protected from the impacts of construction through implementation of the tree protection measures outlined in the Tree Report (03-08-22) and Drawing Nos. WLA/2107/03/TSP (Rev. A) and WLA/2107/03/TCP (Rev. A), including, where appropriate, establishing and protecting the relevant Root Protection Areas (RPAs) and Crown Protection Zones (CPZs) of retained trees.

**REASON**

To protect the verdant character of the area in accordance with Policy DMHB 14 of the Hillingdon Local Plan: Development Management Policies (2020).

**21 NONSC Hours of Use**

The development hereby approved shall only operate between the hours of 06:00 and 23:00, Monday to Sunday.

**REASON**

To protect the amenity of nearby residential properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

**22 NONSC Maximum Internal Floorspace**

The development hereby approved shall provide a maximum of 5130 sqm of additional floorspace within the extension, based on 1026 sqm per floor, and a maximum provision of 5 internal floors.

**INFORMATIVES**

**1 I52 Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

**2 I53 Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan 2021 and national guidance.

DMAV 1 Safe Operation of Airports

DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
LPP SD1	(2021) Opportunity Areas
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI16	(2021) Waterways - use and enjoyment
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking

LPP T6.2	(2021) Office parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

### **3 I70 LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

### **4 I72 Section 106 Agreement**

You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.

## **3. CONSIDERATIONS**

### **3.1 Site and Locality**

The application site is located on the north side of Uxbridge Road, approximately 40 metres east of the junction with Delamere Road, and comprises an existing Shurgard self-storage facility (Use Class B8) within a five storey (16.3 metre) building at the northern end of the site alongside external, direct access self-storage units within a series of single storey structures around the remainder of the site. At the southern end of the site is a standalone single-storey building, with a lighthouse folly, which acts as a reception/office area for staff

The surrounding area has a mixed character, with Uxbridge Road to the south acting as a busy arterial route through Hillingdon and into Ealing with numerous commercial, industrial and residential uses present, whereas to the north and west the area is characterised by two-storey semi-detached and terraced houses. Immediately to the east of the site is the Grand Union Canal, and beyond this is the London Borough of Ealing.

The site is identified within the Hillingdon Local Plan Part 2: Site Allocations and Designations as SA 36, and is allocated for a residential redevelopment of approximately 40 units, with the possibility of retaining a B8 use across the southern part of the site. Prior to its allocation for a residential-led development, the site formed part of the wider Hayes Bridge Industrial and Business Area, equivalent to a designated Locally Significant Industrial Site (LSIS), which extended along the western bank of the canal from Uxbridge Road in the south, to Berwick Avenue in the north (and is now occupied by the residential properties on Tollgate Drive).

### **3.2 Proposed Scheme**

The proposal relates to the demolition of 1150 sqm of the single-storey self-storage units to the south of the main building, followed by the erection of a five-storey extension to create a larger B8 unit within the site. This extension would maintain the same height as the existing building, extended southwards, and the proposed floorspace gain is stated as being 1026 sqm per floor, with between three and five internal floors proposed (provided as demountable mezzanines).

The maximum additional floorspace has been assessed under this application so that any adverse impacts identified would represent the "worst case" scenario, and assuming all five floors are to be installed internally, the proposed extension would have a floor area of 5130 sqm (1026 sqm x 5 floors), leading to an overall uplift of 3980 sqm when the demolished single-storey lock-ups are taken into account. Following completion of the development, the site would have a total floorspace provision of 11, 770 sqm.

On-site parking would increase from 19 (4 visitor spaces and 15 customer spaces) to 20 (4 visitor spaces and 16 customer spaces), of which, 1 visitor space would be wheelchair accessible.

### **3.3 Relevant Planning History**

49467/A/95/1230                      Block C, Westmount Centre Uxbridge Road Hayes  
Change of use from catering and social facilities to Class B8 (Storage and Distribution)

**Decision:** 22-11-1995    Approved

49467/APP/2001/756                Shurgard, Westmount Centre Uxbridge Road Hayes  
ERECTION OF TWO SINGLE STOREY BUILDINGS, LINKED BY A ROOF CANOPY FOR USE AS EXTENSION TO EXISTING SELF STORAGE FACILITY

**Decision:** 18-07-2001    Approved

49467/D/99/0537                    Westmount Centre Fronting Uxbridge Road Hayes  
Change of use of the site to a self-storage facility involving re-cladding and extension of Alpha House, demolition of Bridge House and replacement with two single storey storage units, a single storey office building and a lighthouse and erection of boundary fencing

**Decision:** 31-01-2000    Approved

49467/E/99/0400                    Westmount Centre Fronting Uxbridge Road Hayes  
Change of use to self-storage (Class B8)

**Decision:** 15-09-1999    Approved

#### **Comment on Relevant Planning History**

The planning history indicates that the site has operated within the B8 use class (storage and distribution) since the early 2000s.

### **4. Planning Policies and Standards**

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

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

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)  
The London Plan (2021)  
The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2021), Planning Practice Guidance, as well as relevant supplementary planning documents and guidance are all material consideration in planning decisions.

The proposed development has been assessed against development plan policies and relevant material considerations, discussed below.

### **UDP / LDF Designation and London Plan**

The following Local Plan Policies are considered relevant to the application:-

#### Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.E1 (2012) Managing the Supply of Employment Land
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise

#### Part 2 Policies:

- DMAV 1 Safe Operation of Airports
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DME 2 Employment Uses Outside of Designated Sites
- DMEI 1 Living Walls and Roofs and Onsite Vegetation
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 11 Protection of Ground Water Resources
- DMEI 12 Development of Land Affected by Contamination
- DMEI 14 Air Quality
- DMEI 2 Reducing Carbon Emissions
- DMEI 3 Decentralised Energy
- DMEI 7 Biodiversity Protection and Enhancement
- DMEI 9 Management of Flood Risk
- DMHB 1 Heritage Assets
- DMHB 11 Design of New Development
- DMHB 14 Trees and Landscaping
- DMHB 4 Conservation Areas
- DMT 1 Managing Transport Impacts

DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
LPP SD1	(2021) Opportunity Areas
LPP SI1	(2021) Improving air quality
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LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

## 5. Advertisement and Site Notice

**5.1 Advertisement Expiry Date:- 24th November 2022**

**5.2 Site Notice Expiry Date:- 28th November 2022**

## **6. Consultations**

### **External Consultees**

#### **NEIGHBOUR RESPONSES**

Letters dated 07-10-22 were sent to 36 nearby properties on Delamere Road, Tollgate Drive and Uxbridge Road, a site notice was displayed outside the site on 07-11-22, and a press notice was displayed in a local newspaper on 03-11-22.

One response was received raising the following material consideration:

- Increase in noise, especially at night

CANAL AND RIVER TRUST (22-11-22): The main issues relevant to the Trust as statutory consultee on this application are:

- a) The impact on the character, appearance, and heritage of the waterway
- b) The impact on the structural integrity of the canal.
- c) The impact on the biodiversity of the waterway.
- d) Drainage
- e) Sustainable Energy

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that suitably worded conditions are necessary to address these matters.

The site is located to the west of the Paddington Arm of the Grand Union canal which is part of the designated Ealing Canalside Conservation Area. The existing building is a dominant feature when viewed from the waterway and the proposed extension would be a substantial addition, further increasing its dominance and overall bulk. However, it is positive that overall, the building has now been harmonised in line with the Trust's previous comments and it appears better as a result. It is still disappointing to note though that no new fenestration has been added to the facade, as suggested, to help break down the extent of the large expanse of blank cladding. The improvements to the waterside edge with regards to boundary treatment and planting would aid in enhancing the overall appearance of the site from the waterway, though further consideration of the species selection and measures to mitigate impact on structural integrity are required, please refer to below.

With any development close to the waterway there is the potential for adverse impacts on the infrastructure of the canal in terms of stability, drainage, pollution etc. To protect the structural integrity of the canal some form of root barrier / training will be required for any trees planted as part of the proposed landscaping. This is to prevent any future damage to the waterway wall by roots. This matter could be addressed within a landscaping condition, please see below, and the Trust wish to be consulted on this detail when available.

Further information on foundation details and construction methodology will also be required though considering the set-back from the canal and on the basis that there would appear to be no changes proposed to the existing access road, the Trust are satisfied that in this instance these details could be addressed via the Trust's "Code of Practice for Works affecting the Canal & River Trust ". The

applicant/developer should contact our Works Engineer to discuss this further and contact details are as per an informative.

The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The proposed landscaping enhancements to the canal boundary are positive, as is the biodiverse 'brown' roof. The hedge and tree species proposed overall are generally British native with a good diversity of species included. However, Japanese Rose and *Brachyglottis* spp are listed in the 'native shrub planting species' list, though these are not a native species. Japanese rose is also considered to be an invasive species as it grows in dense thickets and outcompetes other native species. It would therefore be preferable if these were replaced in favour of British native species e.g. Dog rose rather than Japanese rose.

In addition, the fencing will affect the ability of the applicant/developer to maintain the vegetation from their site and further consideration needs to be given as to how the future maintenance of the landscaping will be managed. The fence should also incorporate a litter shield to prevent rubbish being blown into the vegetation line. This matter along with a revised landscaping schedule and maintenance/ management regimes and responsibilities could be addressed by condition. The Trust wish to be consulted on these details when available.

Site investigations should be undertaken to determine the extent of any contamination on the site and the outcome of these and any remediation ground reports submitted for consideration. Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should be avoided and details of pollution prevention measures provided. The submitted Construction and Environmental Management Plan (CEMP) is lacking some detail on these matters, for example it does not include details on the control of surface water during construction, use and storage of fuel/oil. Further detail for demolition and asbestos dust mitigation and a pollution prevention and response plan is also required. A more detailed site-specific CEMP to address these matters should therefore be submitted for consideration. This could be addressed by the submission of a revised CEMP which could be secured by planning condition.

The Trust advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the site, and it should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species. The details of any external lighting proposed could be addressed by condition and the Trust wish to be consulted on this information when available.

The drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways. It is therefore important to ensure that no contaminants enter the canal from surface water drainage. The submission indicates that surface water drainage would be to the existing mains drain. The drainage strategy should be addressed by condition and include details on future maintenance to ensure the system continues to operate as intended.

The Trust wish to highlight the potential of the canal for heating & cooling of the proposed development. To discuss the options in relation to this and any commercial agreements that would be required please contact our representative.

HEATHROW AIRPORT SAFEGUARDING (02-11-22): We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

LONDON BOROUGH OF EALING (16-11-22): No Objection.

NATIONAL AIR TRAFFIC SERVICE (31-10-22): The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

TRANSPORT FOR LONDON (18-11-22): The site is located on Uxbridge Road, which forms part of the Strategic Road Network (SRN). The closest section of Transport for London Road Network (TLRN) is the A312 The Parkway, located approximately 800m to the west of the site. TfL is the highway authority for the TLRN and is therefore concerned about any proposals which could impact on the safety and/or function of the A312.

All development proposals should support the deliver against the Healthy Streets criteria, in line with Policy T2. From the plans provided, it does not appear that any clear and delineated space for pedestrians and cyclists to access the proposed development and cycle parking provision has been provided, or from the site entrance to the main buildings. This raises concerns about pedestrian and cyclist safety. This should be addressed prior to the determination of this application.

To support achieving a strategic modal shift in line with Policy T2, it should be ensured that the routes to public transport facilities, such as that of the bus stop in proximity of the site, is of high-quality.

It is understood that vehicular access to the site will only be via the existing junction onto Uxbridge Road. All vehicles, including customer, staff and servicing vehicles, are to access the proposed development via this junction. The plan included within the Transport Assessment also indicates that this site can be accessed from the north, via Tollgate Drive.

Pedestrian and cyclist access will also be via the existing access junction.

A total of 10 cycle parking spaces is provided, which is below the minimum standards identified within the London Plan. To comply with Policy T5, 24 long-stay and 12 short-stay cycle parking spaces should be provided. It is noted that the applicant is providing two cargo bike spaces.

It should be ensured that cycle parking has been designed in line with London Cycle Design Standards (LCDS), which is referred to within Policy T5. Based on the information provided, cycle parking provision at this site is not in line with LCDS with key areas of non-compliance being:

- Currently, the spacing between the Sheffield stands is 0.75m. As identified within the LCDS, to accommodate standard cycles spacing between Sheffield stands should be 1.2m preferred, 1.0m minimum.
- To accommodate larger and adapted cycles, at least 1.8m between Sheffield stands should be provided.

Long-stay cycle parking is best located in a building. From the plans provided, it appears that all cycle parking provision is located outside. Has the option to provide cycle parking within the building been explored? Where it has been demonstrated that this is not possible, bespoke shelters area an option, but consideration needs to be given to planning requirements. Cycle parking outside of buildings should be:

- Sited in locations that are clearly visible and well overlooked with high-levels of natural surveillance, and CCTV where necessary
- Designed with consideration of sight lines into and out of the cycle cages, compounds or secure store

- Adequately lit and overlooked, particularly at night-time or where parking is under cover

TfL would question whether certain cycle parking locations are achieving the above.

Appropriate end of users facilities, such as lockers, changing areas and showers, should be provided to support an uptake in this mode.

It is understood that the proposed development will provide a total of 39 car parking spaces, of which one will be for disabled person parking provision. The site is, however, located within an Outer London Opportunity Area, as such applying these standards a total of 20 parking spaces should be provided. A reduction in the quantum of parking proposed is therefore required.

It is useful to highlight that the applicant has undertaken an assessment of parking demand for this site, which indicates that the maximum parking demand at any one time for the proposed development is expected to be by 17 vehicles around 13:30 to 14:15 on a Sunday, and 10 on an average weekday. As such, the provision of 39 car parking spaces appears to be excessive.

It is understood that access to the site will be via the existing priority junction onto Uxbridge Road, with no vehicular or pedestrian access available via Tollgate Drive to the north, as per the existing situation.

It is understood that six of the car parking spaces will have active electric vehicle charging provision

The applicant has provided a vehicular trip assessment of the proposed development. It is noted that the applicant undertook a survey of the existing self-storage site between 01/07/2022 and 08/07/2022. This survey recorded all vehicles accessing/egressing the site classified by vehicle type. This data has been utilised to identify the existing trip attraction of the site, and the likely trip attraction of the proposed extension.

Based on this data, it has been estimated that the proposed development will generate an additional 14 vehicle trips during the PM peak period, with only 1 trip during the AM peak. Noting the level of vehicle movement anticipated, it is not considered that this development will have a significant impact on the surrounding strategic highway network.

No multi-modal trip generation assessment has been provided, as such TfL is unable to assess the impact of the proposed development on the public transport network.

It is noted that delivery and servicing will take place on site, which is in line with Policy T7 of the London Plan. Swept path analysis has also been provided showing that a refuse vehicle can enter and exit the site in a forward gear.

In line with Policy T7, a full Delivery and Servicing Plan (DSP) should be secured through condition. A Construction Management Plan has been provided to support this planning application. In line with Policy T7, a full Construction Management Plan should be secured through condition. This should be prepared in line with TfL guidance.

The applicant should focus on promoting modes of sustainable and active travel to this site, rather than that of vehicle. It is noted that the applicant has stated that cycle parking spaces will be provided. It should also be ensured that there is sufficient end of user facilities i.e. lockers and changing areas, to support an uptake in this mode.

The applicant should confirm that construction vehicles will enter and exit this site in a forward gear. A neighbourhood-level map has been provided on the proposed construction vehicle routing. The Council should confirm the acceptability of this vehicle routing, particularly noting that the secondary

vehicular route appears to travel through residential areas.

A Travel Plan has been provided to support this application. No targets have been identified within the submitted Travel Plan - this should be updated. Targets should be in line with the Mayor's strategic mode shift target. Additional measures may be required to support achieving the targets identified.

To conclude, a reduction in the quantum of parking is required and an increase in cycle parking. Safe and clearly delineated space should be provided for pedestrians and cyclists. Design amendments are also required to cycle parking provision at this site. A CLP, Travel Plan and Delivery and Servicing Plan should be secured through condition.

### **Internal Consultees**

**AIR QUALITY OFFICER (17-01-23):** The proposed development is located within the Hays Focus Area, bringing additional traffic emissions which will add to current likely exceedances and contribute to poor local air quality. As per the London Plan, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

LBH requires new developments to 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 (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan (March 2021) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) needs to be Air Quality positive and further action is required to reduce total emissions produced by its operation. Therefore, the total emissions associated with these activities need to be mitigated.

Mitigation measures to reduce emissions can be applied on-site or off-site. Where this is not practical or desirable, pollutant off-setting will be applied. The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied. Table 1 and 2 summarise the aspects of air quality and planning requirements for the proposed development.

The total level of mitigation required to the proposed development for traffic emissions is £61,150. Once all deductions were applied, the remaining value of mitigation due is £55,035. Flat rate deductions applied are as follow: Travel Plan (10%), Green Sustainable Measures (0%), contribution to long term LBH strategic long-term strategies (e.g. multimodal shift) (0%), totalling a reduction of £6,115.

Therefore, if no further mitigation is offered by the applicant, a section 106 agreement with the LAP of £55,035 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

In addition, Air Quality conditions are required to manage operation and construction emissions as

required by the Mayor of London.

BIODIVERSITY OFFICER (06-02-23): The site is of little biodiversity value and although next to a Metropolitan Site of Importance for Nature Conservation, the impacts are minimal. The proposed addition of a green roof is supported and should be specifically identified as a positive of the scheme. Consequently, it would be inappropriate for a developer to seek to remove this element of the design at a later date.

CONTAMINATED LAND OFFICER (15-10-22): I have reviewed a copy of the following report submitted in support of the application. The report represents a detailed phase 1 study which includes an initial Conceptual site Model (CSM) and Preliminary Risk Assessment (PRA).

The CSM outlines some previous developments, at or near to the site, as contaminative uses and the PRA classifies the identified plausible pollutant linkages as Moderate / Low risks to Human Health.

It is considered probable that made ground is present at the site, therefore the report recommends suitable exploratory ground investigations to be conducted at the site.

Notwithstanding the acceptable recommendations for further work which should be implemented accordingly, as outlined in section 7.3 of the submitted phase 1 report, I further recommend two conditions relating to intrusive ground investigations and imported materials, alongside a proposed asbestos informative, which should be applied if planning permission is granted.

ENERGY OFFICER (06-02-23): The energy assessment provides an insufficient baseline on which to determine the starting point for assessing reductions. The baseline indicates that the proposals would have a carbon footprint of just 4tCO<sub>2</sub> per annum. For context, this is a third of the annual average tCO<sub>2</sub> of one person in the UK.

However, the test at this stage of the planning process is to understand whether any concerns could reasonably be resolved through the use of a planning condition. Given the type of development, B8 use with a reduced carbon footprint (not necessarily as low as presented) and available roof space for PVs, then the proposals could reasonably be expected to achieve the required zero carbon standard, subject to a condition.

FLOOD AND DRAINAGE OFFICER (28-10-22): This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy and is proposing the following key items:

- Type of development: Partial demolition and extension to existing building to provide additional self-storage floorspace with associated new car and cycle parking, refuse storage, landscaping, and other associated works ancillary to the development.
- Flood risk: No surface water, tidal or groundwater flood risk to the site (Flood Zone 1).
- Types of conveyance / attenuation features: Underground attenuation tank and green roof.
- Runoff rate restriction (l/s): 15.2 l/s for the 1 in 100 yr event which does not achieve a restriction to greenfield rates.
- Runoff attenuation volume (m<sup>3</sup>): 48
- Maintenance plan: Maintenance to be undertaken by a private maintenance company with tasks and frequencies outlined for the underground cellular systems and other drainage items. No maintenance tasks have been outlined with frequencies for the green roof.

We object to the application for the following reasons:

- The application does not comply with the London Plan Policy SI 13.
- The drainage drawing does not include all of the SuDS features.

- The proposed run-off rates are not the greenfield rates. The hydro-brake device which is proposed on the drainage figure has not been included in the calculations.
- Greenfield, existing and proposed run-off volume amounts have not been provided, which does not comply with S5 and S6 of the Defra Non-Statutory Technical Standards for Sustainable Drainage Systems.
- Flooding is predicted on site for the 1 in 30 year event which does not comply with S7 of the Defra Non-Statutory Technical Standards for Sustainable Drainage Systems. The location of the flooding in the 1 in 100 year event has not been shown.
- The maintenance schedule does not include the proposed green roof or provide the maintenance owner.

To address the above, please can the applicant submit information which:

- It should be clarified why discharge to a watercourse has been discounted, as the site is adjacent to the Grand Union Canal.
- The proposed SuDS features should be marked on the drainage drawing.
- The proposed runoff rate should be reduced so it is as close to the greenfield runoff rate as possible and it should be confirmed how this restriction will be achieved.
- The greenfield, existing and proposed runoff volumes should be provided. The proposed attenuation volume of each feature should be clarified and these should be incorporated into the MicroDrainage calculations.
- The calculations should be amended so there is no flooding in the 1 in 30 year event. The location and extent of the flooding for the 1 in 100 year event should be marked on a drawing. The whole site area has not been included within the calculations. Exceedance flow routes should be marked on the drawing.
- Updating of the maintenance plan to include the green roof and the maintenance owner.

FLOOD AND DRAINAGE OFFICER (12-12-22): This application has changed from the previous application submitted in the following way(s):

- Type of development: N/A
- Types of conveyance / attenuation features: No change in the features proposed but the drainage diagram was updated to include all proposed features.
- Runoff rate restriction (l/s): N/A
- Runoff rate restriction per hectare (l/s/ha): N/A
- Runoff attenuation volume (m3): The greenfield, existing and proposed runoff volumes have been provided.
- Maintenance plan: The maintenance plan has been updated to include the green roof and a maintenance owner has been named.
- Any other previously identified outstanding matters: A justification has been provided for why discharge to the Grand Union Canal has been discounted. Exceedance flow routes have been drawn on a diagram.

We object to the application for the following reasons:

- The proposed runoff rates are not as close as possible to the greenfield rate nor have they been restricted from the existing runoff rates. This does not comply with London Plan Policy SI 13.
- Flooding is predicted on site for the 1 in 30 yr event which does not comply with S7 of the Defra Non-Statutory Technical Standards for Sustainable Drainage Systems. The location of the flooding in the 1 in 100-year event has not been shown on a diagram.

To address the above, please can the applicant submit information which shows:

- The proposed runoff rate should be reduced so it is as close to the greenfield runoff rate as

possible.

- The proposed attenuation volume of each feature should be clarified, and these should be incorporated into the MicroDrainage calculations.
- The calculations should be amended so there is no flooding in the 1 in 30-year event. The location and extent of the flooding for the 1 in 100-year event should be marked on a drawing. The whole site area should be included within the calculations.

HIGHWAYS OFFICER (17-10-22): There are no highways comments in regard to this proposal.

LAMBERT SMITH HAMPTON (16-11-22): With regards to daylight testing, all windows and rooms pass.

All surrounding windows pass sunlight testing.

All amenity areas at the rear along Delamere Road also meets the target value for overshadowing.

NOISE OFFICER (01-11-22): Sufficient information has been provided by the Applicant to make a recommendation with respect to noise, including a noise impact assessment report. It is recommended that no objection is made on noise grounds subject to the inclusion of a suitable condition which should be met based on the design information provided and considering measurement and prediction uncertainty.

TREE OFFICER (14-12-22): Half of the site is situated within TPO 615 which protects One Willow to the South East of the site behind the security fence. I have no tree concerns about this application and as long as the proposed landscape plan is followed it should increase the tree cover in this area

WASTE STRATEGY OFFICER (31-10-22): Please ensure there is no more than 10 meters pull distance from the bin store to the location where the collection vehicle can safely stop for collection. The London borough of Hillingdon do not collect waste separately and also do not collect from wheelie bins therefore a private contractor may be required to collect in this location.

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

The principles of sustainable development are set out in the National Planning Policy Framework (NPPF), and Paragraph 81 sets out that planning decision should create conditions which mean businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Additionally, Paragraph 119 of the NPPF states that planning policies and decisions should promote an effective use of land whilst strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Policies GG2 (Making the best use of land) and GG5 (Growing a good economy) of the London Plan reflect these objectives of the NPPF and state that to create successful sustainable mixed-use places, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres, as well as utilising small sites wherever possible and sites which are well connected by existing or planned public transport. Additionally, boroughs should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration whilst ensuring that physical and social infrastructure is provided to support London's growth.

Specifically, Policy E4 of the London Plan (Land for industry, logistics and services to support London's economic function) requires a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions to be provided and maintained, making provision for the varied operational requirements of light and general industry (use classes E(g)(iii) and B2), storage and logistics (use class B8) and other uses which would be inappropriate outside of an industrial setting. Policy E4 further states that the retention, enhancement and provision of additional industrial capacity should be particularly prioritised in locations that are accessible to the strategic road network or have potential for the transport of goods by rail or water transport and proposals which seek to provide capacity for micro, small and medium-sized enterprises should be encouraged.

Additionally, Policy E7 of the London Plan (Industrial intensification, co-location and substitution) further supports the intensification of employment uses occupying all categories of industrial land, including through the introduction of small units, multi-storey schemes and basements, whilst also seeking to make more efficient use of land through higher plot ratios having regard to operational yard space requirements, and mitigating impacts on the transport network where necessary.

At a borough level, Policy E2 of the Hillingdon Local Plan: Strategic Policies (Location of Employment Growth) sets out that the Council will accommodate 9,000 new jobs during the plan period, with most of this employment growth directed towards suitable sites in the Heathrow Opportunity Area, SILs, LSEs, LSISs, Uxbridge Town Centre and Hayes Town Centre with a particular focus around transport nodes, however Policy DME 2 of the Hillingdon Local Plan: Development Management Policies (Employment Sites Outside Designated Employment Areas) sets out that the loss of employment land, even outside of designated employment areas, will generally be resisted, unless there is no realistic prospect of land being reused for employment purposes.

In general, the provision of new industrial floorspace in appropriately designated locations, or the intensification of existing industrial uses where this can be supported by local infrastructure, is supported through the development plan. Taking the above into account, it is recognised that the intensification of the site to provide an increase in usable B8 floorspace by replacing existing low-level structures to achieve a higher plot ratio would be fully in line with the intentions of Policies E4 and E7 of the London Plan, and Policy DME2 of the Hillingdon Local Plan Part 2. Whilst it is noted that the site is also allocated for a residential-led, potentially mixed-use development (SA 36), and the proposal would contradict this allocation, it would not be reasonable to resist the continuation of an existing use which is seeking to extend and improve its capacity, which is recognised as providing indirect benefits to the wider business and residential uses locally.

On this basis, the principle of development is considered acceptable.

#### **7.02 Density of the proposed development**

Residential density is not relevant to this application.

#### **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

In accordance with the council's statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is necessary to have special regard to the desirability of preserving a listed building and its setting and to preserving or enhancing the character or appearance of a conservation area and its setting.

This requirement is borne out through the NPPF, which advises that where a proposed development would lead to substantial harm to (or total loss of significance of) a

designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

The NPPF further advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Whether a proposal causes substantial harm will be a judgment for the decisionmaker, having regard to the circumstances of the case, relevant local policies and the consideration of the NPPF. Public benefits to offset this harm may follow from many developments and could be anything that delivers economic, social or environmental objectives, and public benefits should flow from the proposed development so that they are of a nature or scale to be of benefit to the public at large and not just of private benefit.

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance. The more important the asset, the greater the weight should be. As such, any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting), should require clear and convincing justification.

As such, Policy HC1 of the London Plan (Heritage conservation and growth) states that proposals affecting heritage assets and their settings, should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Proposals should also identify assets of archaeological significance and use this information to avoid or minimise harm through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

In this regard, heritage 'significance' is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, or through historic associations between people and a place, and where relevant, the historic relationships between heritage assets.

At a borough level, Policy DMHB 1 of the Hillingdon Local Plan: Development Management Policies (Heritage Assets) states that proposals are expected to avoid harm to the historic environment, and proposals which result in harm will only be allowed if it brings an asset back into viable use, it would provide public benefit that would outweigh the harm or loss, and the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials.

Whilst not affecting any heritage assets within the London Borough of Hillingdon, the eastern bank of the Canal falls within the London Borough of Ealing's Canalside Conservation Area, which follows the course of the Grand Union Canal along the southern boundary of Ealing to Wolf Fields, and extends north eastwards to follow the course of the canal. As to be expected, the Canalside Conservation Area has a varied character along its length, and the Character Appraisal prepared by the London Borough of Ealing describes this section of the canal as having a mixed character of suburban residential development and light industry (on the Hillingdon side). Importantly, the appraisal identifies a number of key views in the area, none of which include the site, reflecting its less sensitive nature as

part of the wider setting of the Conservation Area.

Nonetheless, as a result of its size, additional bulk and use of external materials, the proposed extension would have a very minor negative impact on the Conservation Area's setting, reinforcing the industrial use of the site and creating a larger blank facade, which would turn its back on the Canal. This minor impact on the setting of the Conservation Area would be less than substantial, and would not affect its significance, and it is further recognised that industrial units of varying designs and types are relatively commonplace along different sections of the Grand Union Canal, both historically and at present, and therefore the presence of an industrial unit adjacent to the Canalside Conservation Area is not objectionable in and of itself.

#### **7.04 Airport safeguarding**

Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (Safe Operation of Airports) sets out that the council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the relevant airport operator on proposals in the relevant safeguarded areas. In this instance, the requirement to consult on airport safeguarding is for any proposal exceeding 15 metres, 45 metres and 45.7 metres for Heathrow, NATS, and the Ministry of Defence (RAF Northolt) respectively.

The proposal would not increase the height of the pre-existing building, however for completeness, as the building is over 15 metres tall, both Heathrow and NATS have been consulted, and have confirmed they have no objection to the proposal on safeguarding grounds.

#### **7.05 Impact on the green belt**

The proposal would not have an impact on the Green Belt or Metropolitan Open Land.

#### **7.07 Impact on the character & appearance of the area**

Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, including existing and planned supporting infrastructure capacity. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 of the London Plan. In areas of comparatively low densities, incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way.

In addition, Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) sets out that, in order to create successful and sustainable neighbourhoods, new development (including new buildings, alterations and extensions) should be of a high quality design which enhances the local distinctiveness of the area and contributes to a sense of place. As such. Proposals should be designed to be appropriate to the context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials.

The existing site comprises of a large warehouse-style building occupying the northern half with a flat roof (excluding the faux corner gables) and finished in beige and red metallic panelling, and with single-storey lock-ups arranged in rows around the remainder of the site. As a result of the generally low-level housing surrounding the site, the main building is relatively prominent in views facing north from Uxbridge Road and south on Tollgate Drive

around the canal, and is glimpsed between properties on Delamere Road to the west, although the main building's prominence from Uxbridge Road is partially reduced as a result of its lower land level and siting within the northern half of the plot.

The proposed extension would significantly increase the bulk of the main building, extending 28.5 metres further south at a height of 16.3 metres, matching the width and parapet height of the existing building, whilst the faux gables would be removed from the roof. The proposed extension would replace some of the existing single-storey lock-ups, however one row would remain to the south of the proposed building whilst the lock-ups to the west of the building would also stay as existing. However, the site is relatively large and can accommodate the increase in size relatively comfortably without appearing overbearing or cramped in its plot.

It is further noted that because the site sits at a lower level than Uxbridge as it rises to cross the canal to the south, the proposed building would appear smaller from this direction, which is the main public view of the site, whilst views from the north on Tollgate Drive would be largely unaffected because of the location of the extension and existing vegetation. When approaching the site from the west along Uxbridge Road, the existing building is not visible from the public realm until the junction with Delamere Road, and only marginal glimpses can be seen through three branches and between buildings, and approaching the site from the east along Uxbridge Road, the building cannot be seen unless on the canal bridge itself, because of the tight-knit pattern of development and existing coverage provided by trees. The proposed extension is unlikely to change these views, as no change in height is proposed, and the main building would still be set substantially far back into the plot, away from Uxbridge Road and thereby reducing its visibility.

The proposed plans show a revised materiality across the whole building, with a more muted silver, white and red facade treatment, in keeping with the Shurgard branding. This is considered an improvement and is likely to age better than the existing mustard and beige external panels and altogether the proposed materials are accepted.

Regard is also had to the need to optimise a site's potential in accordance with Policy GG2 of the London Plan, including the intensification of industrial sites through higher plot ratios in accordance with Policies E4 and E7 of the London Plan, which the proposal achieves, and taken together with the intentions of Policy D3 of the London Plan and Policy BE1 of the Hillingdon Local Plan Part 1, it is considered that the proposed is acceptable in terms of its overall scale and appearance and would have an acceptable impact on the character and appearance of the area.

## **7.08 Impact on neighbours**

Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties.

Furthermore, the Mayor's Housing SPG sets out that proposals should limit the harm to neighbouring properties, whilst recognising that to comply with policies seeking the optimal use of land, some development proposals may be allowed even where harm has been identified.

### **IMPACTS ON NATURAL LIGHT**

When assessing impacts related to the loss of natural light, the Mayor's Housing SPG advises that avoiding harm to habitable rooms is the priority, which are usually defined as any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition of habitable rooms.

A standardised method of assessment for calculating the level of impact to neighbouring buildings is prescribed within the BRE's guide to good practice, titled 'Site Layout Planning for Daylight and Sunlight' (June 2022). This guidance document discusses various methods of assessing a proposals impact on access to natural light, and sets out a number of thresholds which, if exceeded, would probably have a noticeable impact on natural light to neighbouring properties.

Broadly, BRE guidance recommends that an assessment considers the likely significant effects to daylight for neighbouring buildings in terms of Vertical Sky Component (VSC) and Daylight Distribution (DD) (often referred to as No-Sky Line). An assessment of sunlight should also be undertaken in relation to neighbouring buildings in terms of Average Probable Sunlight Hours (APSH) alongside an assessment of overshadowing.

VSC is a measure of the amount of sky visible from the midpoint of a window, where the area of visible sky is expressed as a percentage of an unobstructed hemisphere of sky. This percentage therefore represents the amount of daylight available for that particular window, and BRE guidance recommends that a VSC of 27% should be maintained, however, this is not always achievable in dense urban environments. In addition to the amount of sky visible, Relative VSC (rVSC) is a measure of the reduction of visible daylight, and BRE guidance recommends that a development proposal would have a negligible impact if the reduction in rVSC is between 0 - 20%, would have minor significance if the reduction is between 21 - 30%, would have moderate significance if the reduction is between 31 - 40% and would have substantial significance if the reduction is above 40%.

Where a proposal would lead to harm of any significance, a No-Sky Line assessment should be carried out. This assessment divides those areas of the working plane (850mm above floor level) which can receive direct skylight, from those which cannot. A room may be adversely affected if, following development, the area of the working plane that can receive direct skylight is less than 0.8 times its former value.

A Daylight and Sunlight Report (4 July 2022) has been submitted in support of the application, and independently reviewed by Lambert Smith Hampton on behalf of the council. The submitted Daylight and Sunlight Report outlines that the impacts to natural light have been tested for the properties on the eastern side of Delamere Road; Nos. 39-63 (odds) and the Army Reserve Centre on the opposite side of the canal. The review carried out by Lambert Smith Hampton agreed with the findings of the report and concludes that the proposed extension would not have a significant impact on natural light for any nearby property, with all windows tested for VSC meeting the target values, alongside overshadowing assessments for the rear gardens.

On this basis, the impacts to neighbours in respect of daylight and sunlight impacts would be negligible.

#### IMPACTS ON PRIVACY

The supporting text to Policy DMHB 11 sets out that sufficient privacy for existing residents will be protected by resisting proposals which would introduce an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. To maintain existing levels of privacy, a minimum separation distance of 21 metres between facing habitable room windows of habitable rooms will normally be required, and in some locations, for example where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary. Moreover, new development proposals must carefully consider their layout and massing in order to ensure development does not result in a significantly increased sense of enclosure or loss of outlook.

As a commercial development, the proposal does not include any windows serving habitable rooms, and having regard to the specific end user as a B8 storage facility where the users would be transient in their use of the building, there would no increase in overlooking as a result of the proposed extension.

#### **7.09 Living conditions for future occupiers**

Not relevant to this application.

#### **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

##### TRAFFIC IMPACTS

Policy T1 of the London Plan (Strategic approach to transport) sets a strategic target of 80% of all trips in London to be made by foot, bicycle or public transport by 2041, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. To achieve this shift across London, it is expected that outer London boroughs will need to ensure that 75% of trips be made by foot, bicycle or public transport by 2041, compared to 60% (in 2021).

In addition, Policy T4 of the London Plan (Assessing and mitigating transport impacts) states that the proposals should integrate with the current and planned transport network in terms of access, capacity and connectivity, which should be demonstrated through the submission of a Transport Statement or Transport Assessment, to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. This includes the cumulative impacts of development on public transport and the road network capacity including walking and cycling. Where appropriate, mitigation, either through direct provision or through financial contributions, will be required to address adverse transport impacts that have been identified, which could include improvements to public transport, walking and cycling facilities, alongside other necessary highways improvements.

In support of the application, a Transport Assessment (January 2023) has been submitted, which sets out that the existing site generates 2 two-way vehicular movements in the morning peak and 10 two-way vehicular movements in the afternoon peak, based on survey data carried out over a week to establish the baseline (existing) conditions. Despite the fairly significant uplift in floorspace, the proposal is unlikely to lead to a significant number of vehicle movements with a predicted morning peak of 2 two-way trips, and an afternoon peak of 14 two-way trips. This slight increase in vehicle trips (+4 two-way trips in the afternoon) is considered to be negligible in the context of Uxbridge Road and would not have a significant impact on the local traffic or congestion, or lead to a significant increase in vehicle movements in the area. On this basis, traffic impacts associated with the proposal are considered to be low.

##### VEHICLE PARKING

Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking.

The maximum car parking standards, disabled persons parking, and the provision of electric or other Ultra-Low Emission vehicles are set out in Policy T6.1 to Policy T6.5, however it should be noted that for all development types in PTAL 5 or 6, or within the Central Activities Zone, proposals are expected to be car-free.

Policy T6.5 (Non-residential disabled persons parking) also sets out that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with, and designated bays should be marked up as disabled persons parking bays from the outset.

Policy T6 further states that adequate provision should be made for efficient deliveries and servicing and emergency access. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.

The parking standards outlined Table 1, Appendix C of the Hillingdon Local Plan: Development Management Policies must be complied with as required by Policy DMT 6 of the Hillingdon Local Plan: Development Management Policies (Vehicle Parking). These parking standards facilitate sustainable development and address issues relating to congestion and amenity. Variations to the approved standards may be acceptable if this would not lead to an adverse impact to on-street parking provision, congestion or harm local amenity. Alternatively, a higher or lower provision may be justified through the submission of a transport appraisal and travel plan. The application site has a Public Transport Accessibility Level (PTAL) of 2, on a scale of 0 (worst) to 6b (best), indicating that the proposed development would result in some reliance on the private car for trips to and from the site, although there is a bus stop immediately to the south of the site on Uxbridge Road.

Table 1 of Appendix C to the Hillingdon Local Plan: Development Management Policies sets out that for B use classes (excluding offices), 2 car parking spaces, plus an additional space for every 50-100 sqm of floorspace, should be provided on-site. These local standards should be considered alongside Policy T6.2 of the London Plan (Office Parking), which sets out that car parking provision for B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to the parking standards for offices and take account of the significantly lower employment density in such developments. Policy T6.2 further sets out that a degree of flexibility may also be applied to reflect different trip-generating characteristics, and that provision for electric or other Ultra-Low Emission vehicles should be made. The London Plan standards for offices are up to 1 space for every 100 sqm within Outer London. However, comments from TfL indicate that the site falls within the Heathrow Opportunity Area, where more restrictive parking standards apply, and the maximum provision allowed would be 20 spaces, based on a floorspace of 11, 770

sqm. Whilst designated in 2008, the boundary of the Heathrow Opportunity Area is yet to be defined but was indicatively shown to extend from the south of the borough up to Uxbridge Road, adjacent to the borough boundary with Ealing and the site is therefore either just within or on the boundary of this Opportunity Area.

The updated Transport Statement (February 2023) outlines that based on existing surveys undertaken whilst the site was operating at 92% capacity, the maximum parking demand at any one time was 11 vehicles, which was recorded between 13:30 to 14:15 on a Sunday, whilst the maximum number of vehicles recorded on site during the busiest weekday was 7. Based on an uplift of 3980 sqm, and assuming the site operates at 100% capacity following competition, the maximum parking demand would expect to peak at 17 vehicles on a Sunday and 10 on weekdays.

The proposed number of car parking spaces has been reduced as part of this application, in accordance with comments received from TfL, with 39 initially proposed and 20 currently proposed. Based on the submitted information, which demonstrated a peak demand of 17 vehicles, it is clear that the provision of 39 spaces would have been needlessly high and would have resulted in large parts of the site given over to unnecessary parking, whereas the provision of 20 spaces is both in line with the London Plan standards and is more appropriate given the predicted level of use of the site.

On this basis, the proposed number and layout of parking spaces is considered to be acceptable and would allow for parking demands to be accommodated on site without leading to overspill parking on the surrounding local roads, and without overproviding unnecessary off-street parking spaces which would encourage trips by private car.

## CYCLE PARKING

Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.

Developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

For B8 uses, the London Plan requires 1 long-stay for every 500 sqm of floorspace and 1 short-stay cycle space for every 1000 sqm of floorspace. As such, based on a maximum floor area of 11, 770 sqm, 24 long-stay spaces ( $11,770 / 500 = 23.5$ ) and 12 short-stay spaces ( $11,770 / 500 = 11.8$ ) are required to meet the London Plan standards. The submitted Transport Statement (February 2023) correctly identifies the required level of provision, and the plans and supporting information have been amended to show 24 long-stay spaces and 12 short-stay spaces. The provision of cargo-bike spaces within the cycle store is further welcomed and would help to encourage trips to and from the site other than by private car.

In any event, a condition requiring that the proposed cycle spaces meet the London Cycle Design Standards (LCDS) will also be included, including having the appropriate spacing between stands, appropriate shelter and ensuring it is safe, secure, and adequately lit.

On the basis that the provision of cycle parking can be adequately addressed through a condition, it is considered that the proposal would be compliant with Policy T5 of the London Plan.

## DELIVERIES AND SERVICING

Policy T7 of the London Plan (Deliveries, servicing and construction) sets out that proposals should facilitate safe, clean, and efficient deliveries and servicing, and include provision of adequate space for servicing and storage, whilst deliveries should be off-street, with on-street loading bays used only where this is not possible.

It is noted that delivery and servicing will take place on site, which is in line with Policy T7 of the London Plan, and swept path analysis has also been provided showing that a refuse vehicle can enter and exit the site in a forward gear.

A full Delivery and Servicing Plan would be secured by way of condition, alongside a construction management and logistics plans to control elements of the build process, however it is considered that the site can accommodate its servicing needs on-site without affecting the free flow of traffic on nearby roads.

## HEALTHY STREETS

Policy T2 of the London Plan (Healthy Streets) requires proposal to demonstrate how they will deliver improvements that support the 10 Healthy Streets Indicators in line with Transport for London guidance to reduce the dominance of vehicles on London's streets, whether stationary or moving, and be permeable for pedestrians and cyclists by connecting to local walking and cycling networks, as well as public transport.

At present, there is no clear separation of vehicle and pedestrian zones within the site, with road markings indicating the direction of vehicle traffic only. The proposed development would increase the intensity of use of the site, with more vehicles and more users of the facility in general, and on this basis, it is considered appropriate to secure further details of delineated spaces for pedestrians and vehicles by condition, which shall identify the key routes for pedestrians within the site, which will likely be from the site entrance to the reception, cycle stores and entrance to the buildings.

## ACCESS

Access arrangements would remain unchanged with customer and staff access from Uxbridge Road to the south, with no vehicular or pedestrian access (apart from emergency access) available via Tollgate Drive to the north.

### **7.11 Urban design, access and security**

Policy D11 of the London Plan (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. 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. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. Measures to design out crime, including counter terrorism measures, should be integral to proposals, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) encourages the creation of safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson, having regard to Secure by Design standards.

As such, a condition requiring the proposed development to achieve secured by design accreditation in consultation with the Metropolitan Police, is included within the decision notice, to ensure the proposal meets the requirements of Policy D11 of the London Plan and Policy BE1 of the Hillingdon Local Plan. On this basis, the proposal is considered acceptable in this regard.

#### **7.12 Disabled access**

Policy D5 of the London Plan (Inclusive design) sets out that 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, be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, and proposals should ensure they are compliant with Policy D12 of the Plan (Fire safety) and place fire resilience central to the proposal's design.

The proposed scheme would ensure there is level access from the dedicated disabled persons

parking space to each entrance door, at an appropriate gradient. All floors within the proposed building would be accessible by lifts (three lifts), with level access on each individual floor, and a condition is included to ensure that at least one of these will be a suitably sized fire evacuation lift.

On this basis, the proposed site-wide accessibility arrangements are considered to be acceptable.

#### **7.13 Provision of affordable & special needs housing**

Not relevant to this application.

#### **7.14 Trees, landscaping and Ecology**

Policy G5 of the London Plan (Urban Greening) requires major proposals to 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 and trees. Policy G6 of the London Plan (Biodiversity and access to nature) further sets out that Sites of Importance for Nature Conservation (SINCs) should be protected and aim to secure net biodiversity gain from major developments.

Additionally, Policy G7 of the London Plan (Trees and Woodlands) seeks to protect and maintain London's urban forest and woodlands, whilst new trees should be planted in appropriate locations to increase the extent of London under the canopy of trees. In practice, this means that wherever possible, existing trees of value should be retained and

if permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the trees to be removed.

At a borough level, Policy EM7 of the Hillingdon Local Plan Part 1 (Biodiversity and Geological Conservation) sets out that Hillingdon's biodiversity will be preserved and enhanced, resisting adverse impacts particularly to SINC's and the provision of biodiversity improvements from all feasible developments, including green roofs and walls where feasible. In addition, Policy DMEI 7 of the Hillingdon Local Plan Part 2 (Biodiversity Protection and Enhancement) requires the design and layout of new development to retain and enhance any existing features of biodiversity or geological value within the site, and where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site.

Policy DMHB 14 of the Hillingdon Local Plan Part 2 (Trees and Landscaping) also sets out that all developments will be expected to retain or enhance biodiversity through the protection of existing landscaping, trees and other natural features of merit, and proposals are required to provide a scheme of hard and soft landscaping to demonstrate this. Moreover, the council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) for the benefit of wildlife and a healthier lifestyle.

As the proposal is an extension to an existing B8 use, the scheme does not need to demonstrate a Urban Greening Factor (UGF), however in accordance with Policy EM7 and DMEI 7 of the Hillingdon Local Plan, the proposal should demonstrate how it achieves a biodiversity net gain.

At present, the site is dominated by hardstanding and provides very little ecological benefit, despite its proximity to the Grand Union Canal, which is a SINC. The proposal development provides an opportunity to enhance landscape features around the periphery of the site, retaining the trees protected by a Tree Preservation Order in the south-east corner, in addition to the introduction of a biodiverse roof above the extension. These measures combine to result in a fairly significant uplift in ecological value compared to existing conditions, with an uplift of 66% and 100% for broad and hedgerow habitats respectively.

Full details of the landscape scheme and other ecological measures would be secured by way of condition, including impacts of artificial lighting on the canal, and the ongoing management and maintenance responsibilities.

On this basis, it is considered that the proposal complies with the intentions of Policies G5 and G7 of the London Plan and with Policies EM7 and DMEI 7 of the Hillingdon Local Plan in protecting and enhancing ecological assets, and is therefore acceptable in this regard.

#### **7.15 Sustainable waste management**

Policy EM11 of the Hillingdon Local Plan: Strategic Policies (Sustainable Waste Management) 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.

The Design and Access Statement (Rev. B) outlines that the waste collection strategy will remain as existing, with a collection vehicle entering the site from Uxbridge Road, collecting waste and recycling from the rear of the reception building at the southern end of the site, and circling the reception building in an anti-clockwise direction to ensure that the vehicle

does not need to perform a three-point-turn to exist the site in forward gear. In any event, as a purely commercial development the council would not collect refuse or recycling from the site, which would be managed by a private contractor, and the proposed layout and strategy appear to allow commercial collections in a convenient manner fully within the site so as not to impact traffic on Uxbridge Road.

On this basis, the proposed waste management strategy is considered acceptable, and the proposal is considered to comply with Policy EM11 of the Hillingdon Local Plan.

#### **7.16 Renewable energy / Sustainability**

Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation:

1. be lean: use less energy and manage demand during operation
2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4. be seen: monitor, verify and report on energy performance.

Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum on-site reduction of at least 35% beyond Building Regulations will be achieved. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site, provided that an alternative proposal is identified and delivery is certain.

Moreover, major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations (i.e. unregulated emissions).

The submitted Energy Statement (July 2022) provides an insufficient baseline on which to determine the starting point for assessing reductions as it indicates that the proposals would have a carbon footprint of just 4tCO<sub>2</sub> per year, which is demonstrably false and far too low.

However, given the type of development, the proposals could reasonably be expected to achieve the required zero carbon standard, through, for example PV panels and/or air source heat pumps, and these details can be secured by way of condition. The proposal should seek to be zero-carbon, and any shortfall can be provided as a financial obligation, calculated at the point of commencement based on an updated Energy Strategy. On this basis, the proposal can achieve policy compliance through the use of a condition and

therefore this would not warrant a reason for refusal in and of itself.

#### **7.17 Flooding or Drainage Issues**

Policy SI 12 of the London Plan (Flood risk management) sets out that flood risk across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities and developers where relevant. Proposals should further ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading.

In addition, Policy SI 13 of the London Plan (Sustainable drainage) sets out that proposal should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Policy EM6 of the Hillingdon Local Plan: Strategic Policies (Flood Risk Management) encourages development to be sited away from the areas of highest flood risk (Flood Zones 2 and 3), and all development will be required to use sustainable urban drainage systems (SUDS). The application site is in Flood Zone 1 and is at therefore at the lowest risk of flooding.

In support of the application, a Drainage Strategy (13-07-22), an updated Drainage Strategy (20-01-23), and a Technical Design Note (26-01-23) have been submitted which set out the approach to sustainable drainage and water management. These are sufficient to provide a baseline understanding of the proposed drainage strategy and some further details to be submitted can be secured by way of condition.

#### **7.18 Noise or Air Quality Issues**

##### **NOISE**

Policy D13 of the London Plan (Agent of Change) sets out that proposals should mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes. Proposals should first seek to separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials, in preference to sole reliance on sound insulation. Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles, promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Additionally, Policy D14 of the London Plan (Noise) states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures. It is generally accepted that noise emanating from residential properties is lower than

commercial premises, and industrial uses are associated with the highest noise profile.

A Noise Impact Assessment (July 2022) has been submitted which assesses the impact of vehicles accessing the site in the context of surrounding road networks, as well as the impacts associated with proposed fixed plant and equipment serving the development. The Noise Impact Assessment outlines that the main source of noise in the area is caused by traffic on Uxbridge Road to the south, and that the nearest residential properties are on Delamere Road to the west. The mechanical plant on site would operate throughout the day and night-time periods as required, and a generator would typically operate daytime hours during testing, and the Noise Impact Assessment outlines that plant and equipment should be selected and mitigated to ensure noise levels are not greater than 5dB below the background noise level at the nearest residential receptors.

Comments from the Council's Noise Officer set out that sufficient information has been provided and that no objection should be made on noise grounds subject to the inclusion of a suitable condition which should accord with the design information provided in respect of noise attenuation and mitigation.

On this basis, the proposal is considered acceptable in respect of noise impacts and complies with Policies D13 and D14 of the London Plan.

## AIR QUALITY

Policy SI 1 of the London Plan (Improving air quality) states that proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create unacceptable risk of high levels of exposure to poor air quality.

As such, as a minimum, proposals should be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution, whilst making provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

Major development proposals must be submitted with an Air Quality Assessment. Proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) requires all developments to 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 cleaner transport fuels.

In accordance with Policy SI 1 of the London Plan and Policy EM8 of the Hillingdon Local Plan, developments need to be neutral as minimum and positive in Air Quality Focus Areas (AQFAs), contributing to the reduction of air pollutant emissions in these sensitive locations. New developments within the London Borough of Hillingdon are expected to 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, namely AQFAs.

The application site falls within the borough's AQMA, and the Ossie Garvin AQFA, and it is therefore expected that the proposal demonstrate an air quality positive approach, including measures to improve local air quality, preferably on-site but off-site or through a financial obligation (offsetting) if necessary. The extension to the building will increase the operational capacity of the site and is likely to result in more vehicle trips to and from the site, which in turn will worsen existing conditions and contribute to poor local air quality, and mitigation will therefore be required.

LBH requires new developments to 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 (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan (March 2021) requires development to be air quality positive, especially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

An Air Quality Assessment (July 2022) has been submitted which concludes that the proposed development would be Air Quality Neutral in terms of building emissions but would not be Air Quality neutral for transport emissions, and that this would require some form of mitigation. Notwithstanding that the development should seek to demonstrate that it is Air Quality Positive, the assessment of impacts within the Air Quality Assessment has been reviewed by the Council's Air Quality Officer and the Air Quality Assessment is considered to be robust and accurately reflects the potential impacts to air quality.

In order to comply with Policy SI 1 of the London Plan and Policy EM8 of the Hillingdon Local Plan, an Air Quality Positive approach is required, and noting the limited opportunities to reduce emissions on site, an off-site financial contribution of £55, 035 is required to offset the impacts to local air quality which would be used to fund initiatives to reduce poor air quality in the borough. This would be secured as a planning obligation within a legal agreement, in addition to conditions securing a low emission strategy and managing impacts during demolition and construction.

On this basis, the proposal is considered acceptable in respect of impacts to air quality.

#### **7.19 Comments on Public Consultations**

Letters dated 07-10-22 were sent to 36 nearby properties on Delamere Road, Tollgate Drive and Uxbridge Road, a site notice was displayed outside the site on 07-11-22, and a press notice was displayed in a local newspaper on 03-11-22.

One response was received raising the following material consideration:

- Increase in noise, especially at night

#### **7.20 Planning obligations**

Policy DF1 of the London Plan (Delivery of the Plan and Planning Obligations) requires proposals to provide infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and support delivery of the council's strategic objectives. In general, the London Plan sets out that priority should first be applied to securing affordable housing and necessary public transport improvements, and following this, delivering necessary health and education infrastructure, whilst recognising the

importance of securing affordable workspace, and culture and leisure facilities.

At a borough level, Policy DMCI 7 of the Hillingdon Local Plan: Development Management Policies (Planning Obligations and Community Infrastructure Levy) sets out that planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it, to ensure that development is sustainable in accordance with the NPPF (2021). Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL) and through planning obligations.

Specifically, planning obligations are used to secure the provision of affordable housing in relation to residential development schemes, and where a development has infrastructure needs that are not addressed through CIL to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Applications which fail to include appropriate planning obligations to make the proposal acceptable will be refused. Planning obligations run with the land, are legally binding and enforceable.

The Community Infrastructure Levy Regulations, the NPPF and Planning Practice Guidance have put three tests on the use of planning obligations into law. In this regard, planning obligations must meet the following tests to be lawful:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonable related in scale and kind to the development.

The following Heads of Terms are proposed, to be secured through a section 106 agreement to either ensure policy compliance or to address deficiencies in the scheme which could not be addressed through amendments to the plans:

- i) A full and detailed Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;
- ii) A full Commercial Travel Plan, including a Low Emission Strategy, shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured;
- iii) A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge Condition 5, with the offset calculation based on £95 per tonne of CO<sub>2</sub> over a 30 year period;
- iv) Air Quality Mitigation Cost of £55,035 to be used by the Council to fund measures to reduce poor air quality within the borough; and
- v) A Project Monitoring and Management Fee, equalling 5% of the total financial contributions paid under this agreement.

The proposal would be CIL liable.

#### **7.21 Expediency of enforcement action**

N/A.

#### **7.22 Other Issues**

FIRE STRATEGY

In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan states that all proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside spaces for fire appliances to be positioned on, provide suitable access and equipment for firefighting which is appropriate for the size and use of the development, and provides spaces which are appropriate for use as an evacuation assembly point.

Buildings should be designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire by being constructed in an appropriate way to minimise the risk of fire spread. This should include appropriate fire alarm systems, passive and active fire safety measures, suitable and convenient means of escape and an associated robust evacuation strategy which can be periodically updated and published, and which all occupants can have confidence in. These measures should be set out in a Fire Strategy, prepared by a suitably qualified fire engineer.

In support of the application, a draft Fire Statement Form was submitted, which outlines the basics of fire safety measures, with the knowledge that further details would be secured at detailed design stage. The submission of these additional details would be secured by condition.

#### LAND CONTAMINATION

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) states that the council expects proposals for development on contaminated land to provide mitigation strategies that will reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

A Phase 1 Contaminated Land Study has been submitted which has been reviewed by the Council's Land Contamination Officer who is satisfied with its conclusions and recommends that matters relating to future contamination identification, remediation and subsequent verification be secured by condition. On this basis, the proposal is considered acceptable in respect of contaminated land.

### **8. Observations of the Borough Solicitor**

#### General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

#### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent

should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

#### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

#### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

### **9. Observations of the Director of Finance**

N/A.

### **10. CONCLUSION**

The proposed development seeks a relatively large extension to an existing B8 self-storage unit on Uxbridge Road. As a continuation of an existing use, the principle of development is considered acceptable, and it is considered that despite the large increase in massing and floorspace, the proposal would not appear overbearing or harmful to the wider character or appearance of the area.

The transport impacts of the proposal can all be accommodated on site, with the amount of proposed parking reduced following comments from TfL, and all delivery and servicing to take place within the site.

Overall, the proposal is considered to make better use of an existing brownfield site to provide more employment floorspace and this is encouraged by the London Plan and

Hillingdon Local Plan, and the proposal is recommended for approval on this basis, subject to the conditions and obligations listed in this report.

## **11. Reference Documents**

London Plan (2021)

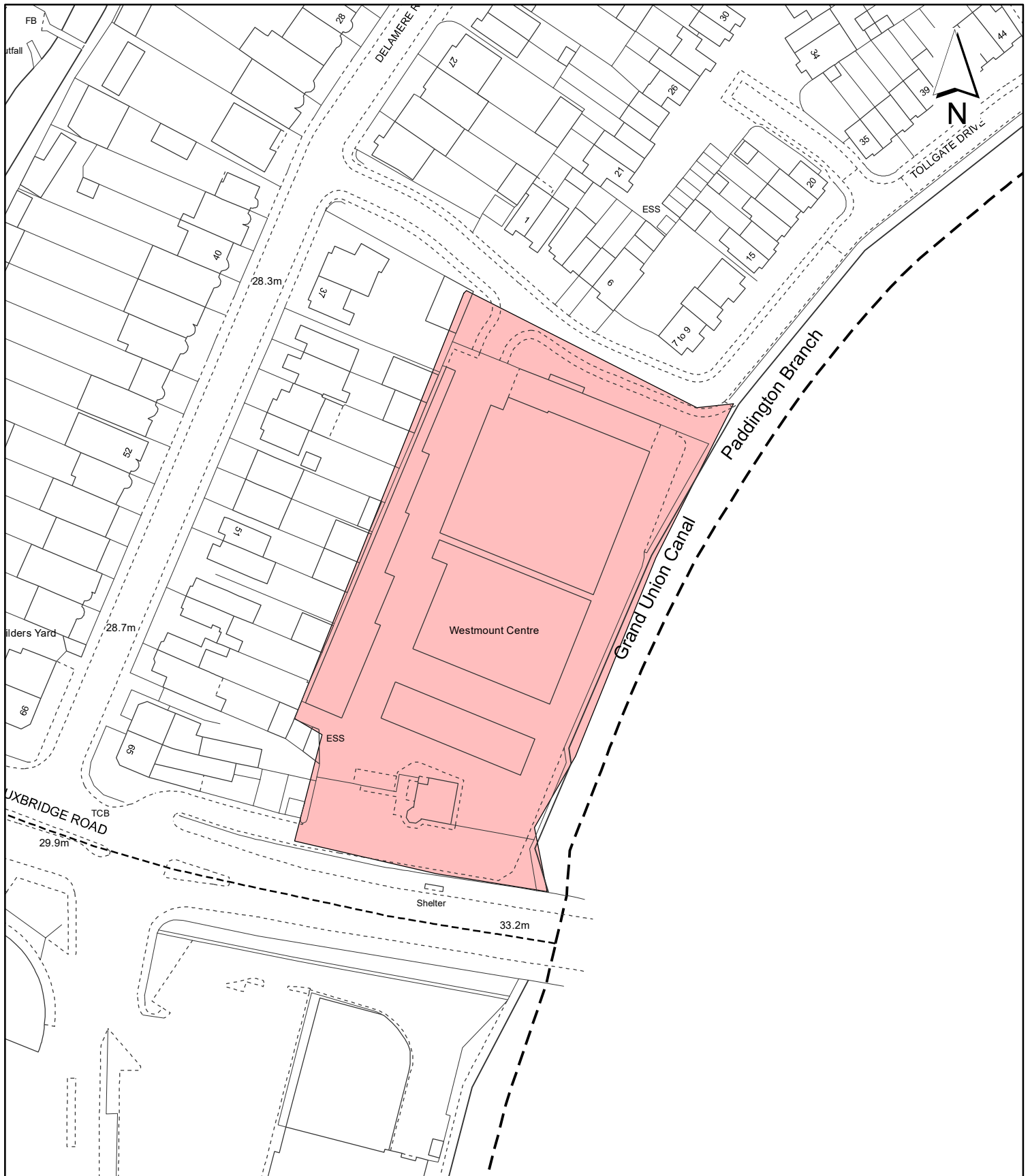
Hillingdon Local Plan: Strategic Policies (2012)

Hillingdon Local Plan: Development Management Policies (2020)

National Planning Policy Framework (NPPF) (2021)

**Contact Officer:** Andrew Thornley

**Telephone No:** 01895 250230



**Notes:**

 Site boundary

For identification purposes only.  
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Site Address:

**Shurgard House**

**LONDON BOROUGH OF HILLINGDON**  
 Residents Services  
 Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:  
**49467/APP/2022/2801**

Scale:  
**1:1,250**

Planning Committee:  
**Major Page 103**

Date:  
**February 2023**



**HILLINGDON**  
 LONDON

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## Report of the Interim Director of Planning, Regeneration & Public Realm

**Address** WOODLANDS PARK LANDFILL SITE LAND SOUTH OF SLOUGH ROAD  
IVER BUCKINGHAMSHIRE

**Development:** Out of borough consultation for Buckinghamshire County Council: Outline planning application with all matters reserved except for principal points of access for the redevelopment of the former landfill site to comprise a data centre development (Use Class B8 (Data Centre)) of up to 163,000 sq.m (GEA) delivered across 3 buildings to include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. The scheme includes site wide landscaping and the creation of parkland, and may also include cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, District Heating Network, sustainable drainage systems, ancillary infrastructure and a substation.

**LBH Ref Nos:** 39707/APP/2022/3243

**Drawing Nos:** 21091.302 Rev. F  
21091.303 Rev. E  
21091.304 Rev. F  
21091.305 Rev. E  
21091.306 Rev. E  
Design and Access Statement  
21091.501 Rev. B  
21091.301 Rev. F  
Planning Statement (Dated November 2021)  
J10/12542A/10/1/F3 Air Quality Assessment (Date 21st October 2021)

**Date Plans Received:** 24/10/2022      **Date(s) of Amendment(s):**

**Date Application Valid:** 24/10/2022

### 1. SUMMARY

Buckinghamshire Council have requested the London Borough of Hillingdon's comments on an application which seeks Outline Planning Permission for the redevelopment of the former landfill site to comprise a data centre development (B8 (Data Centre)) of up to 163,000 sqm (GEA) delivered across 3 buildings. The scheme includes site wide landscaping and the creation of Parkland. The data centre buildings include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. The development may also include cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, District Heating Network, sustainable drainage systems, ancillary infrastructure and a substation.

Notably, the site covers a large area of Metropolitan Green Belt and is currently undeveloped. It is considered that this area of Green Belt performs well when viewed against the purposes of Green Belt. The Green Belt as a whole is critical in assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.

The National Planning Policy Framework (NPPF) (2021) outlines that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except

in very special circumstances. Substantial weight must be given to any harm to the Green Belt and very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

The proposed development would not meet any of the exceptions outlined within either Paragraph 149 or 150 of the NPPF (2021). The applicant has sought to identify the very special circumstances that would be needed to outweigh the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal.

The proposed development would result in a significant increase in built footprint and volume, not only from the three new data centre buildings, but also from the substation, battery storage facility (separate application), roads and ancillary security structures (e.g. any fences or security huts). The volume of the three large buildings alone would be vast and cause significant harm to the openness of the Green Belt. This harm is given substantial weight and is not considered to be outweighed by the very special circumstances presented under the application submission. As such, it is considered that very special circumstances do not exist.

In connection with the above, it is considered that the proposed development, by reason of its siting, size, scale and design, would be detrimental to the open, greenfield and Green Belt character, appearance and visual amenities of the area, as observed within mid-range views and the wider townscape/landscape context in long-range views.

Further, the proposed development is not sustainable, air quality neutral, or clean by design and produces significant adverse impacts on sensitive receptors downwind of the application site within Hillingdon. This would deteriorate existing poor air quality conditions and increase local background levels.

For the reasons outlined within the main body of the report, Hillingdon Council raise an objection to the proposed development.

## **2. RECOMMENDATION**

### **1 NON2 Objection - Green Belt**

The proposed development would constitute inappropriate development within designated Green Belt land and very special circumstances do not exist to outweigh the harm to the Green Belt by reason of inappropriateness. As such, the proposed development conflicts with Paragraphs 147 to 151 of the National Planning Policy Framework (2021).

### **2 NON2 Objection - Design**

The proposed development, by reason of its siting, size, scale and design, would be detrimental to the open, greenfield and Green Belt character, appearance and visual amenities of the area, as observed within mid-range views and the wider townscape/landscape context in long-range views. As such, the proposed development conflicts with Paragraphs 126 to 136 of the National Planning Policy Framework (2021).

### **3 NON2 Objection - Air Quality**

The proposed development is not sustainable, air quality neutral, or clean by design and produces significant adverse impacts on sensitive receptors downwind of the application site within Hillingdon. This would deteriorate existing poor air quality conditions and increase local background levels. As such, the proposed development conflicts with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon

Local Plan: Part 2 (2020), the London Borough of Hillingdon Air Quality Action Plan 2019-2023, Policy SI 1 of the London Plan (2021), and Paragraphs 174 and 186 of the National Planning Policy Framework (2021).

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

The application site comprises the Woodlands Park Landfill Site situated on land to the south of Slough Road predominately arranged to the east of the M25 between junction 16 (M40) to the north and junction 15 (M4) to the south. The site measures approximately 52.4 hectares and is located within the Buckinghamshire Council administrative area only but immediately adjoins the western Hillingdon Council boundary.

The application site is demarcated to the west by the M25 and to the east by the River Colne and comprises an area formerly worked for gravel and subsequently used for landfill in the mid to late 20th Century. To the south of the landfill are a number of fields either side of Palmer's Moor Lane, extending as far as the rear of properties on the B470 Iver Lane. The northern site boundary is defined by a fence-line across the landfill surface, with an access track connecting up to the A4007 Slough Road.

Within Hillingdon Council's administrative area, the site adjoins the West London Industrial Park (a Strategic Industrial Location), and the River Colne which is a designated Conservation Site of Metropolitan or Borough Grade I Importance. The adjoining land also forms part of designated Green Belt land and the Colne Valley Archaeological Priority Zone

#### **3.2 Proposed Scheme**

This out of borough consultation for Buckinghamshire County Council relates to an application which seeks Outline Planning Permission for the redevelopment of the former landfill site to comprise a data centre development (B8 (Data Centre)) of up to 163,000 sqm (GEA) delivered across 3 buildings. The scheme includes site wide landscaping and the creation of Parkland. The data centre buildings include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. The development may also include cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, District Heating Network, sustainable drainage systems, ancillary infrastructure and a substation.

#### **3.3 Relevant Planning History**

39707/APP/2021/3769 Buckinghamshire County Council Outborough Middlesex

Out of borough consultation for Buckinghamshire County Council: Construction and operation of 57MW battery storage facility, landscaping, fencing, and extension and widening of internal site access track.

**Decision:** 09-03-2022 OBJ

39707/APP/2021/4456 Buckinghamshire County Council Outborough Middlesex

Out of borough consultation for Buckinghamshire County Council: Outline planning application with all matters reserved except for principal points of access for the redevelopment of the former landfill site to comprise a data centre development (B8 (Data Centre)) of up to 163,000 sqm (GE delivered across 3 buildings. The scheme includes site wide landscaping and the creation of

Parkland. The data centre buildings include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. The development may also include cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, District Heating Network, sustainable drainage systems, ancillary infrastructure and a substation

**Decision:** 09-03-2022 OBJ

#### **Comment on Relevant Planning History**

None.

#### **4. Planning Policies and Standards**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

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

#### **UDP / LDF Designation and London Plan**

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.EM8 (2012) Land, Water, Air and Noise

Part 2 Policies:

DMEI 14 Air Quality

LPP SI1 (2021) Improving air quality

NPPF2 NPPF 2021 - Achieving sustainable development

NPPF4 NPPF 2021 - Decision-Making

NPPF6 NPPF 2021 - Building a strong, competitive economy

NPPF8 NPPF 2021 - Promoting healthy and safe communities

NPPF9 NPPF 2021 - Promoting sustainable transport

NPPF11 NPPF 2021 - Making effective use of land

NPPF12 NPPF 2021 - Achieving well-designed places

NPPF13 NPPF 2021 - Protecting Green Belt Land

NPPF14 NPPF 2021 - Meeting the challenge of climate change flooding

NPPF15 NPPF 2021 - Conserving and enhancing the natural environment

NPPF16 NPPF 2021 - Conserving & enhancing the historic environment

NPPF17 NPPF 2021 - Facilitating the sustainable use of minerals

#### **5. Advertisement and Site Notice**

5.1 Advertisement Expiry Date:- Not applicable

**5.2** Site Notice Expiry Date:- Not applicable

## **6. Consultations**

### **External Consultees**

None.

### **Internal Consultees**

AIR QUALITY OFFICER:

#### Summary of Comments

The proposed development is in the vicinity of the LBH Air Quality Management area (AQMA), within approximately 550 metres of LBH Uxbridge Focus Area and approximately 650 metres of LBH Hillingdon Hospital Focus Area (please see Figure 1), bringing additional emissions which will add to current background levels as well as likely to impact on sensitive receptors already exposed to poor air quality in the area and or future residents of the residential opportunity area immediately to the West of the application site (the application site is in the immediate vicinity of an allocated new homes area as per the LBH housing Plan).

As per the London Plan and LBH Local Action Plan 2019-2024, developments need to be air quality neutral as minimum. LBH requires new developments to 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 (LBH Air Quality Local Action Plan 2019-2024), namely AQMA and Focus Areas and or their catchment areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area.

The proposed development is considered not air quality neutral as per the London Plan requirements; whilst the application is outside the GLA's jurisdiction, sensitive receptors within the LBH will be exposed to the most adverse impacts due to emissions resulting of the proposed development and therefore the proposal need to comply with regional policy to safeguard LBH citizen's health.

Furthermore, the proposed development is not clean by design, using diesel backup generators for its operation instead of alternative cleaner technologies, which would significantly reduce total annual emissions of NO<sub>x</sub> and PM, which are pollutants of concern in terms of public health. In particular, PM<sub>2.5</sub> has been subject to significantly tighter target limits on the 2021 WHO global air quality guidelines, as a result of robust epidemiological evidence of the hazardous effects of this pollutant on human health.

Given the significant number of diesel backup generators (171 units), and the lifetime associated with the operation of the proposed development (i.e. 30 years), planning must be effective to select the most sustainable technologies, which, once approved, will be in place for a long period of time. Unlike vehicle emissions, which are expected to reduce significantly over the next 10 to 20 years, diesel backup generators will remain polluting at the same load/rate over the lifetime of the proposal, emitting NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

Finally, location plays a central role in the planning decision making process and the location of the proposed development is inappropriate given the LBH Plan allocated new homes area in the

immediate vicinity of the proposed development (please see Figure 1). Therefore, new residents of this area would be exposed to unacceptable emission levels and resulting pollution concentrations from the operation of the proposed facility.

Therefore, given the concerns expressed above, LBH has undertaken a detailed peer review of the air quality report submitted to support the outline planning application of the proposed development. Key findings of the peer review are summarised in Appendix A.

#### Damage Cost Mitigation

The development is not sustainable without further mitigation and further action is required to reduce emissions. As it stands, the proposed development will expose LBH sensitive receptors to moderate to substantial adverse impacts with an (underestimated) 18.2 tonnes/year of NO<sub>x</sub> released on an annual basis into the atmosphere, together with 0.9 tonnes/year of PM<sub>2.5</sub>; such level of annual emissions is unacceptable, increasing local backgrounds and counterfeiting planning efforts to improve air quality and protect citizen's health. The damage cost to society is a good indicator of the damage such emissions originate in terms of health and other as well as the benefits should the proposal be refused.

#### Reason for Refusal (if objecting)

The proposed development is not sustainable, not air quality neutral, not clean by design (SRC fitting is a default measure and does not go beyond the need to retrofit for compliance purposes, therefore the claim in the AQ report that the proposal is clean by design because of SCR is not accepted) and produces significant adverse impacts on sensitive receptors downwind of the proposed facility at LBH, deteriorating existing poor air quality conditions and increasing local background levels, which counterfeits the LA efforts to improve air quality and safeguard citizen's health through the measures contained in the Local Action plan.

Therefore, the proposed development is contrary to policy EM8 of the Local Plan: Part 1 (November 2012), policy DME1 14 of the London Borough of Hillingdon Local Plan (part 2), the London Borough of Hillingdon Air Quality Action Plan 2019-2023, London Plan (2021) policy SI1, and paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2021).

#### Observations

The damage cost calculated used the most up to date guidance and most recent baseline year costs, as per Defra's released data. There are cleaner by design technologies for backup generators that can be used by data centres with proven success elsewhere in the country.

#### AIR QUALITY OFFICER FOLLOW-UP:

1 - Diesel backup generator data sheets - no emission concentration values for NO<sub>x</sub> and PM<sub>10</sub> (mg/Nm<sup>3</sup>, 5% O<sub>2</sub> at standard conditions) are available in the manufacturers datasheets, therefore the applicant has assumed the units would meet the Medium Combustion Plant emission limits of 190mg/Nm<sup>3</sup> (at 15% O<sub>2</sub>) or 500mg/Nm<sup>3</sup> (at 5%O<sub>2</sub>), at standard temperature, pressure, dry conditions). Whereas it seems the air quality report has corrected for temperature and water content, it is not clear they have corrected for actual exhaust pressure of 6.3 m<sup>3</sup> s<sup>-1</sup> actual pressure. If they have not, then their emission rate of 0.80 g/s is incorrect being significantly higher.

2 - The proposed development is not air quality neutral and mitigation via S106 payment is due using Defra's damage cost approach. In order to calculate total pollutant annual emissions to the atmosphere, an appropriate testing and maintenance regime must be applied to ascertain the total operating time and loads. The Air Quality report does not offer a suitable testing and operating

regime with only a total of 12 hours per year of operation considered. This is unrealistic and unacceptable. An illustrative testing and maintenance example with a realistic operating schedule and associated emission loads was used to check the damage cost due and the order of magnitude is right - therefore the originally calculated damage cost value of £5,300,954 stands.

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

#### **DATA CENTRE**

The proposal involves constructing three large buildings up to 163,000 sqm and their ancillary requirements on a substantial parcel of undeveloped strongly performing Metropolitan Green Belt. Compared to the biggest commercial industrial permissions approved in 2021, it would have been the 9th largest in England. The submission has significant cross-boundary implications for the London Borough of Hillingdon but is also premised on meeting the stated requirements of an entire region that expands beyond two districts. By any definition, the proposal should be considered strategic and complex in nature.

Paragraph 13 of the National Planning Policy Framework (NPPF) (2021) states that the planning system should be genuinely plan-led. This proposal is being put forward on an unallocated site that has not been released from its designation as Green Belt. It is evident that the proposal does not conform with the Development Plan. It is unsurprising that the applicant has sought to progress this outside of the plan-making process. If this type of need was raised as part of the plan-making process, it would clearly be considered a strategic issue that crossed multiple administrative boundaries, which consequently would create an opportunity to discuss the capacity for other planning authorities to meet this need in more appropriate locations.

This is particularly pertinent when one considers the relatively footloose nature of these facilities. Whilst the applicant's submission tries to justify in one section that data centres must be delivered in an area between Slough and West Drayton, it also concludes at multiple points that, in a no development scenario, the need would be met internationally across different parts of Europe. For example, on Page 5 of the Economics Report it states:

'There is a strong likelihood that the major investment in the hyperscale data centre would go to alternative competing centres in Europe. This competition includes: (a) the established and fast growing centres in Frankfurt and Paris (which are also major competitors to London/the UK for other global technology and knowledge-based services investments); and (b) other locations such as Dublin or, increasingly, Scandinavia which have proved attractive to some hyperscale data centre operators.'

On Page 31 it states how Paris and Frankfurt have greater capacity to deliver data centres:

'However, London accounts for a lower share of new data centre capacity under construction (27%) and the rate of increase in capacity is much slower in London than in Paris and Frankfurt. Both these centres, according to JLL, are seeing strong increases in supply. The H1 2021 report notes the constraint on supply in London as being "lack of available power in core submarkets" and also it notes the "rise of self-build hyperscale campus" in London.'

On Page 36 it outlines how the investment could go to another country and suggests that it may even be advantageous for data centre operators:

'Data centre operators have many alternative choices as to where they locate within Europe. As noted earlier, there are other successful and growing data centre locations in Europe that offer some, if not quite all, of London's locational advantages (and may be slightly cheaper). These are the other FLAP-D centres, but most notably Frankfurt and Paris which are also vying with London to attract other internationally footloose service sectors businesses serving the European market (such as HQs, financial services firms etc). This competition has speeded up since and has been highlighted by Brexit (especially in the financial services sector).'

On Page 30, it also concludes that agreed data equivalence between the EU and the UK has removed concerns for data centre and other sectors about data protection and security equivalence arrangements. Put simply, one cannot logically come to the conclusion that new data centre capacity can only be achieved between Slough and West Drayton, whilst also suggesting that the same demand will otherwise be met in Europe.

Notwithstanding the above, it is clear that need for data centres generated by centralised demand in London is being met across an entire region. The data centre is said to be required to serve sectors operating out of London, including financial services, business and professional services, research and development and the creative sectors (eg publishing and advertising and research). It is important to note that these services are not based near the application site, but predominantly within Inner London. These needs are already being met and planned for on suitable brownfield sites across the entire region and there is a significant pipeline of planning permissions being attained by the market. Whilst there is no complete map of data centres within the region, attempts at mapping these areas are publicly available on sites like Colo-X.com and datacentermap.com. It clearly shows that data centres do not need to be limited to the Site Search Area being suggested by the applicant. Page 33 of the Economic Benefits and Needs Assessment Report ('Econ Report') outlines that both Slough and Docklands to the east of the City of London serve as primary locations for the clustering of data centres. There is nothing to suggest that they will not continue to do so in the future. Furthermore, this report also overlooks how data centres are being constructed in other areas in and around London, as can be viewed on the aforementioned public maps. Locations as far as Hemel Hempstead and Farnborough have clusters of data centres (three or more). Strangely there is no reference to Park Royal in West London, which also has a prominent cluster of data centres that continues to grow, with a number of new permissions in the pipeline.

All London Boroughs, through the adoption of the new Spatial Development Strategy (London Plan 2021), have in place development plan policies to protect and intensify designated and non-designated industrial sites across Greater London. In particular, Policy E7 of the London Plan (2021) has added support for the intensification of industrial sites through higher plot ratios, the addition of basements and the construction of multi-storey units. This has successfully started to lead to the intensification of industrial land for denser buildings, which in particular has seen a rise in applications for large data centres. One can utilise the Mayor of London's referable applications portal to see that planning permission for 13 sites have been put forward on previously developed land since the first publication of the plan in 2018. Most of these are large enough to meet the 'hyperscale' floorspace definition in Paragraph 2.10 of the applicant's Economic Report. It should be noted that these sites are only for applications that, due to their scale, have been made referable to the GLA. There are undoubtedly other applications that have been determined or are being processed of a non-referable scale, including smaller scale data centres, refitting of existing B8 units and extensions of existing data centres.

The author of these comments only has access to more detailed data from its district (the London Borough of Hillingdon). However, Table 1 outlines the new data centre capacity alone in the London Borough of Hillingdon that is subject to planning permission. As you can see, through an entirely brownfield first policy, the Council has been able to deliver new data centre capacity in the borough, which includes one of the largest data centre campuses in Europe. It also has an approved pipeline of planning permissions and a large applicant awaiting determination of a permission. It should be noted that four out of five of these sites meet the 'hyperscale' definition provided in Paragraph 2.10 of the applicant's Economic Report. The Council's development plan continues to protect multiple large industrial parks and includes a complementary policy on intensification, which will continue to bring forward individual sites for redevelopment if they are not undermined by proposals on low value Green Belt sites.

New Data Centre Capacity in the London Borough of Hillingdon that is subject to the planning application process:

- Application reference 38421/APP/2021/4045: Optimum Data Centre, Beaconsfield Road, UB4 0SL (Redevelopment progressed by Colt DCS) - 39,814sqm floorspace, hyperscale on brownfield land (application process ongoing)
- Application reference 75111/APP/2020/1955: Union Park, North Hyde Gardens, UB3 4DG (Redevelopment progressed by Ark Data Centres) - 56,000sqm floorspace, hyperscale on brownfield land (application approved)
- Application reference 1331/APP/2017/1883: Segro Park Hayes, West London, North Hyde Gardens, UB3 4QR - 22,265sqm floorspace, hyperscale on brownfield land (application approved)
- Application reference 37977/APP/2015/1004: Virtus Stockley Park Data Centre Campus (LON 5, 6, 7 & 8), Stockley Park - 45,000sqm floorspace, hyperscale on brownfield land (development complete)
- Application reference 54795/APP/2000/817: Digital Realty W. Drayton, 1 Airport Gate, Bath Rd - 4,000sqm floorspace, not hyperscale on brownfield land (development complete)

Whilst it is accepted that there are some locational factors that make some sites more attractive for data centres (e.g. proximity to high capacity fibre cable networks), this clearly does not need to lead to the conclusion that data centres must be provided between Slough and West Drayton. It is clear from the evidence above that there are a whole host of other localities with brownfield sites where data centres are and will continue to be delivered. The applicant's approach of disguising preferential parameters as absolute necessities has unsurprisingly led them back to their own site, in the hope of adding significant potential use value to an unallocated greenfield site.

It is noticeable that the applicant states within the submission that they do not know the demand for data centres in the London Area. On Page 3 of the Economics Report, it states the following:

'There are no specific long-term forecasts of need or demand for data centres in the London area. However, given the underlying growth rates and the historic performance, it is highly likely historic rate of growth, or something close to them, would continue if there are suitable sites for data centres in and around London. During 2021, London is forecast to account for 40% of the absorption (take-up) of data centre capacity in the key European centres. However, other European centres, particularly Frankfurt and Paris, are experiencing rapid growth in the supply of data centres and, to some degree, are catching up with London.'

However, elsewhere the submission appears heavily reliant on the premise that there is a need for 15 hyperscale data centres in the London area. This is merely based on an estimate of increasing the existing number of data centres by 25%. Even if this could be relied upon, the applicant would have needed to engage with the data on just quite how many other new brownfield sites were being built and could be brought forward in the future. This information is completely absent from the submission and therefore there is not an accurate representation of data centre supply being portrayed to decision-makers. Indeed, if this position was put forward, it clearly would show the extent of growth that is happening and is possible in the future, without the need to develop on the Green Belt.

If it was assumed that 15 hyperscale data centres were required and they needed to go on very large undeveloped sites in this part of the Green Belt, it would set a very significant precedent for the destruction of London's Metropolitan Green Belt outside of the plan-making process. It would open up nearly all of London's Green Belt to speculative applications for 14 more hyperscale data centres, each of which would consume a staggering amount of Green Belt. Any low value undeveloped site near to preferential parameters could argue that they were meeting some form of estimated need which would outweigh significant harm to the Green Belt and other factors. That would clearly be contrary to the great importance that national policy attaches to Green Belts and the aim of protecting their openness. One of the core purposes of the Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Approving this application would quite clearly be contrary to this purpose and fundamentally undermine the work of data centre companies who continue to regenerate brownfield sites across the region.

#### **7.02 Density of the proposed development**

Not applicable to the consideration of this out of borough consultation.

#### **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

Not applicable to the consideration of this out of borough consultation.

#### **7.04 Airport safeguarding**

Not applicable to the consideration of this out of borough consultation.

#### **7.05 Impact on the green belt**

The proposal is located within the Green Belt. The site boundary covers a large area of Metropolitan Green Belt and is currently undeveloped. It is considered that this area of Green Belt performs well when viewed against the purposes of Green Belt, particularly in terms of preventing unrestricted sprawl and the merger of Uxbridge/Cowley with northern parts of Iver, as well as preventing encroachment into Colne Valley Park. The Metropolitan Green Belt as a whole is critical in assisting in urban regeneration, by encouraging the recycling of derelict and other urban land. Contrary to suggestions in the submission, there is no national policy support for building over the Metropolitan Green Belt simply because of the existence of the M25. Indeed, such an approach would clearly constitute encroachment into and the urbanisation of the Green Belt. The existence of the M25 does not prevent people being able to cross over and under the M25 at multiple points and enjoying the openness of the Green Belt on either side. Indeed, this point is demonstrated on Page 18 of the D&S, which shows existing commonly used walking paths over the M25.

The National Planning Policy Framework (NPPF) (2021) outlines that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight must be given to any harm to the Green Belt and very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

The proposed development would not meet any of the exceptions outlined within either Paragraph 149 or 150 of the NPPF (2021). The applicant has sought to identify the very special circumstances that would be needed to outweigh the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal. Comments on the perceived need for a data centre in this location have been made above. There is also commentary on the impact to the openness of the Green Belt and the other perceived benefits below.

### Impact on Openness

The National Planning Practice Guidance (NPPG) outlines what factors should be taken into account when considering the potential impact of development on the openness of the Green Belt. From a spatial perspective, there would be a considerable increase in built footprint, not only from the three new data centre buildings, but also from the substation, battery storage facility (separate application), roads and ancillary security structures (e.g. any fences or security huts). The volume of the three large buildings alone would be vast and cause significant harm to the openness of the Green Belt. The Landscape Visual Impact Assessment (LVIA) also shows how the proposal would be very visible from multiple receptors, obscuring views through the Green Belt at points, as well as having a significant urbanising effect on an area of undeveloped land. In terms of measuring increases in activity, the site is currently undeveloped land that presumably attracts very little activity at present. The new development is of a significant scale. Whilst it is noted that the position on the exact number of vehicle trips is still to be determined, what is clear is that there will be a significant number of staff and daily deliveries required as part of this development, which will represent a clear and continuous increase in trip generation and activity on site from the current position. All of the harm identified about would be permanent.

### Very Special Circumstances

#### 1) Need for a Data Centre

It is agreed that there is a need for data development. However, there are existing, approved and proposed data centres coming forward to meet the data needs of the economy in London and adjoining boroughs. LBH have identified existing data centre sites providing in excess of 399,000m<sup>2</sup> floorspace, approved data centre sites with more than 363,000m<sup>2</sup> floorspace and proposed sites with more than 494,000m<sup>2</sup> floorspace, totalling more than 1,256,000m<sup>2</sup> floorspace. In simple terms, the LBH are reasonably willing to support data centre sites across the borough provided that the proposed development(s) meet policy and where applicable have planning conditions and/or obligations attached to the permissions to ensure development of this nature is acceptable in planning terms. This diminishes the need for such data centre development in inappropriate locations.

#### 2) Economic Impact / Support for Local Businesses and 3) Direct and Indirect Employment Generation

Regarding economic benefits, it is agreed that in general terms there would be economic benefits arising from the proposed scheme, as is the case with large scale employment proposals of most types. LBH is unable to verify the Appellant's stated figures with respect to the scale of the economic benefits. Paragraph 81 of the NPPF (2021) affords significant weight to support economic growth and productivity, accordingly LBH afford significant weight to the economic benefits.

#### 4) Creation of New Parkland and Enhanced Biodiversity

It is worth noting that the Environment Act 2021 has established that all planning permissions granted in England have to deliver at least 10% BNG from November 2023. The LBH Development Plan does require the protection and enhancement of biodiversity but technically the requirement to achieve 10% BNG is not yet established, and care should be taken when considering the weighting of such matters.

The information submitted states that a biodiversity net gain of up to 5% would be achieved. Given the aspirational minimum percentage numbers noted above, the proposed 5% gain would not be significant. BNG is a baseline planning policy requirement and failure to meet the aspirational 10% minimum is indicative of a site which has not been optimised in a biodiversity sense.

The proposed designation of 45 acres of land to become publicly accessible, gifting to a charity group and payment of £1 million is noted. However, by definition, any agreed planning obligations must only be sought where they are necessary to make the development acceptable in planning terms and directly related to the development. If these measures are not proposed as planning obligations, they cannot be secured and given weight. If they are proposed as planning obligations, they must meet the tests outlined under paragraph 57 of the NPPF (2021).

Planning obligations must be necessary to make development acceptable, be directly related to the development and be fair and reasonable in scale and kind to the development. Making the land publicly accessible and gifting it to a charity group could take place outside of the planning process. It is not necessary to make the development acceptable. By definition, mitigation secured by a planning obligation also cannot constitute a very special circumstance. Mitigation brings the development back to the baseline that is planning policy compliance.

#### 5) Education and Employment Fund

The applicant proposes to provide a £20 million fund towards education and employment initiatives. Under the Link Park Appeal decision (ref. APP/N0410/W/22/3297192 and APP/R5510/W/22/3297194), the Inspector stated the following:

'57. The submitted Unilateral Undertaking in respect of Appeal A includes an employment and skills contribution. At the hearing, Buckinghamshire Council confirmed that they do not have a project on which this contribution would be utilised and that there is no planning policy basis for seeking such a contribution. Given that there is a likelihood that the contribution would not be utilised for its intended function, I do not believe that this contribution is necessary or reasonable.'

As the proposed £20 million fund is proposed to be secured by a Section 106 legal agreement for use by Buckinghamshire Council, the Inspector's position on this would apply again under the current application. The proposed gifting of money would not meet the necessary tests and cannot be considered a very special circumstance.

#### 6) Energy Efficient Hyperscale Data Centre

The information submitted indicates a commitment to BREEAM 'excellent' and carbon neutrality by 2030. These matters are minimum planning policy requirements which should

be met in any case. These aspects of the scheme are not unique to the proposed development or this site, rather it would be expected of any development coming forward. This point is afforded neutral weight.

#### 7) Heat Capture for District Heating System

It is acknowledged that the proposed development would facilitate the delivery of a district heating network of c.150MW zero carbon heat, sufficient to serve up to 3,000 homes. As addressed within Section 07.01 of the report, it is not agreed that there is a need for a data centre to be located on designated Green Belt land. As such, it is posited that the benefit of such a district heating network could also be achieved as part of a scheme located on a brownfield site. Only very limited weight is afforded to this consideration.

#### 8) Public Services and Facilities

The Applicant states that the development would achieve a Community Infrastructure Levy payment of £4 million and annual business rates payment of £6 million. Again this is not unique to the proposed development or this site, rather it would be secured for any development coming forward. This point is afforded neutral weight.

#### 9) Decontamination of the Site

Decontamination of the site is a baseline planning policy requirement. This point is afforded neutral weight.

#### 10) Lack of Alternative Sites

It is LBH's position that there are more appropriate brownfield sites outside the Green Belt, which could better meet demand. It is considered that the impatience of the data centre market should not be afforded weight in the consideration of this scheme; especially when taking into account that the development would result in permanent, inappropriate and harmful development with the Green Belt.

It is noteworthy that there are many sites throughout London which are allocated for industrial-related activities, and this would include data centre operations. Data Centres are therefore fully accounted for and suitable for industrial sites which are duly allocated as part of any local and regional plan. The London Plan (2021) identifies 55 Strategic Industrial Locations (SILs), including the following in Hillingdon:

- Hayes Industrial Area;
- North Uxbridge Industrial Estate;
- Stonefield Way / Victoria Road; and
- Uxbridge Industrial Estate.

Further to this, the Hillingdon Local Plan: Part 1 (2012) identifies several Locally Significant Industrial Sites (LSIS). These are listed below for reference:

- Packet Boat Lane, Cowley;
- Braintree Road, South Ruislip; and
- Covert Farm, Heathrow.

More specifically, the Greater London Authority's 'London Industrial Land Supply & Economy Study' (2016) confirms that there is 7,544.1ha of designated and non-designated industrial land in London, including 127.6ha of designated and non-designated industrial

land in the Park Royal / A40 / Heathrow areas. Evidently, there are many sites across London and Hillingdon which are suitable for industrial development.

In summary, it is not agreed that this type of development can be brought forward only in this location or that it could not be delivered on a more appropriate brownfield site elsewhere in the region. It may be the case that all of the stated benefits (and more) could be achieved on a more appropriate brownfield site within the region. Data centre capacity is continuously being created; both internationally and locally. Within London, capacity is being created through the repurposing and regeneration of brownfield sites, that are not within the Green Belt and do not harm its openness.

#### Conclusion

The proposed development by reason of its greater impact on the openness of the Green Belt when compared to the existing development would constitute inappropriate development within designated Green Belt land. The factors identified by the Applicant as together constituting VSCs do not clearly outweigh the harm to the Green Belt by reason of inappropriateness and other harm including that posed to the open greenfield character of the area.

#### **7.07 Impact on the character & appearance of the area**

The proposed development comprises three data centre buildings, including ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. The development may also include cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, District Heating Network, sustainable drainage systems, ancillary infrastructure and a substation.

Paragraphs 126 to 136 of the National Planning Policy Framework (2021) makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. This National Design Guide (2021), and the National Model Design Code (2021) illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice.

Paragraph 40 of the National Design Guide (2021) states that well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
- integrated into their surroundings so they relate well to them;
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage.

The application site adjoins the western boundary of the London Borough of Hillingdon's administrative area. The site forms part of designated Green Belt and is characterised by greenfield land. Accordingly, the existing site complements the purpose of its Green Belt designation by preserving openness.

The Uxbridge Industrial Park is located to the west and is notably separated from the site by the River Colne, as well as the administrative boundary.

In terms of the height of the buildings specifically, it is useful to note that the 23m height (27m with external flues) would meet the definition of tall buildings held within the London Plan (18m). Whilst the application is not subject to the London Plan (2021), this definition was introduced as a specific intervention from the Secretary of State, in order 'to avoid forms of development which are often considered to be out of character'. The scale of

development proposed would result in a form of development which would be visible from land located within Hillingdon Council's administrative boundary. There is clearly no existing precedent for buildings of such a height in this location and it evidently does not reflect local character.

The proposed development, by reason of its siting, size, scale and design, is considered to be detrimental to the open, greenfield and Green Belt character, appearance and visual amenities of the area, as observed within mid-range views and the wider townscape/landscape context in long-range views.

**7.08 Impact on neighbours**

Not applicable to the consideration of this out of borough consultation.

**7.09 Living conditions for future occupiers**

Not applicable to the consideration of this out of borough consultation.

**7.10 Traffic impact, Car/cycle parking, pedestrian safety**

Not applicable to the consideration of this out of borough consultation.

**7.11 Urban design, access and security**

Not applicable to the consideration of this out of borough consultation.

**7.12 Disabled access**

Not applicable to the consideration of this out of borough consultation.

**7.13 Provision of affordable & special needs housing**

Not applicable to the consideration of this out of borough consultation.

**7.14 Trees, landscaping and Ecology**

TREES AND LANDSCAPING

Not applicable to the consideration of this out of borough consultation.

ECOLOGY

The site adjoins the River Colne, a Nature Conservation Site of Metropolitan or Borough Grade I Importance. Any impact on the ecological value of the site and connecting habitats should be considered by Buckinghamshire Council's Ecology Specialist.

**7.15 Sustainable waste management**

Not applicable to the consideration of this out of borough consultation.

**7.16 Renewable energy / Sustainability**

Not applicable to the consideration of this out of borough consultation.

**7.17 Flooding or Drainage Issues**

Any impact on the flood and water management should be considered by Buckinghamshire Council's Flood and Water Management Specialist.

**7.18 Noise or Air Quality Issues**

NOISE

There are no Hillingdon residential properties within the immediate vicinity of the site. As such, the impact on the nearest residential noise environment is not considered to be applicable to the consideration of this out of borough consultation.

AIR QUALITY

The site is located next to the Hillingdon Air Quality Management Area and Uxbridge Air

Quality Focus Area. Following consultation with the Council's Air Quality Officer, it is understood that the proposed development is not sustainable, not air quality neutral, not clean by design and produces significant adverse impacts on sensitive receptors downwind of the application site within Hillingdon. This would deteriorate existing poor air quality conditions and increasing local background levels. An objection is raised on this basis.

#### **7.19 Comments on Public Consultations**

Not applicable.

#### **7.20 Planning obligations**

Not applicable.

#### **7.21 Expediency of enforcement action**

Not applicable.

#### **7.22 Other Issues**

##### **IMPACT ON ELECTRICAL CAPACITY**

It is noted that the application has been submitted with a written submission from Pivot Power outlining that they have secured a connection from the National Grid's Iver substation and that they can supply power to this proposed development.

However, it is not clear what the ramifications would be of using the National Grid's capacity on this unplanned site. The National Grid currently needs to support a number of existing and planned developments in the area, which are reported to the National Grid on a consistent basis. Indeed, there is business growth already identified in the allocated employment areas of Uxbridge, North Uxbridge SIL and Uxbridge Industrial Estate (SIL). These sites have been allocated for intensification over the plan period and therefore capacity must exist to allow these sites and their businesses to continue growing.

As this application is being progressed outside of the plan-making process, there has been no holistic view as to its infrastructure requirements and how these affects those already identified in Local Plans. Whilst it would not be uncommon for small windfall sites to come forward outside of the plan-making process, this is a very large site on a greenfield site and therefore should only be progressed through the plan-making process.

### **8. Observations of the Borough Solicitor**

#### **General**

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

#### **Planning Conditions**

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

#### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

#### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

### **9. Observations of the Director of Finance**

Not applicable

### **10. CONCLUSION**

The proposed development would constitute inappropriate development within designated Green Belt land and very special circumstances do not exist to outweigh the harm to the Green Belt by reason of inappropriateness.

The proposed development, by reason of its siting, size, scale and design, would be detrimental to the open, greenfield and Green Belt character, appearance and visual amenities of the area, as observed within mid-range views and the wider townscape/landscape context in long-range views.

The proposed development is not sustainable, air quality neutral, or clean by design and produces significant adverse impacts on sensitive receptors downwind of the application

site within Hillingdon. This would deteriorate existing poor air quality conditions and increase local background levels.

Accordingly, Hillingdon Council raise an objection to the proposed development.

#### **11. Reference Documents**

National Planning Policy Framework (July 2021)

National Design Guide (January 2021)

National Model Design Code (June 2021)

**Contact Officer:** Michael Briginshaw

**Telephone No:** 01895 250230

# Plans for Major Applications Planning Committee

Wednesday 22nd February 2023



**HILLINGDON**  
LONDON

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## **Report of the Interim Director of Planning, Regeneration & Public Realm**

**Address** LAND EAST OF MONS BARRACK ST ANDREWS PARK HILLINGDON ROAD UXBRIDGE

**Development:** Reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19 (Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works).

**LBH Ref Nos:** 585/APP/2022/665

NOTES

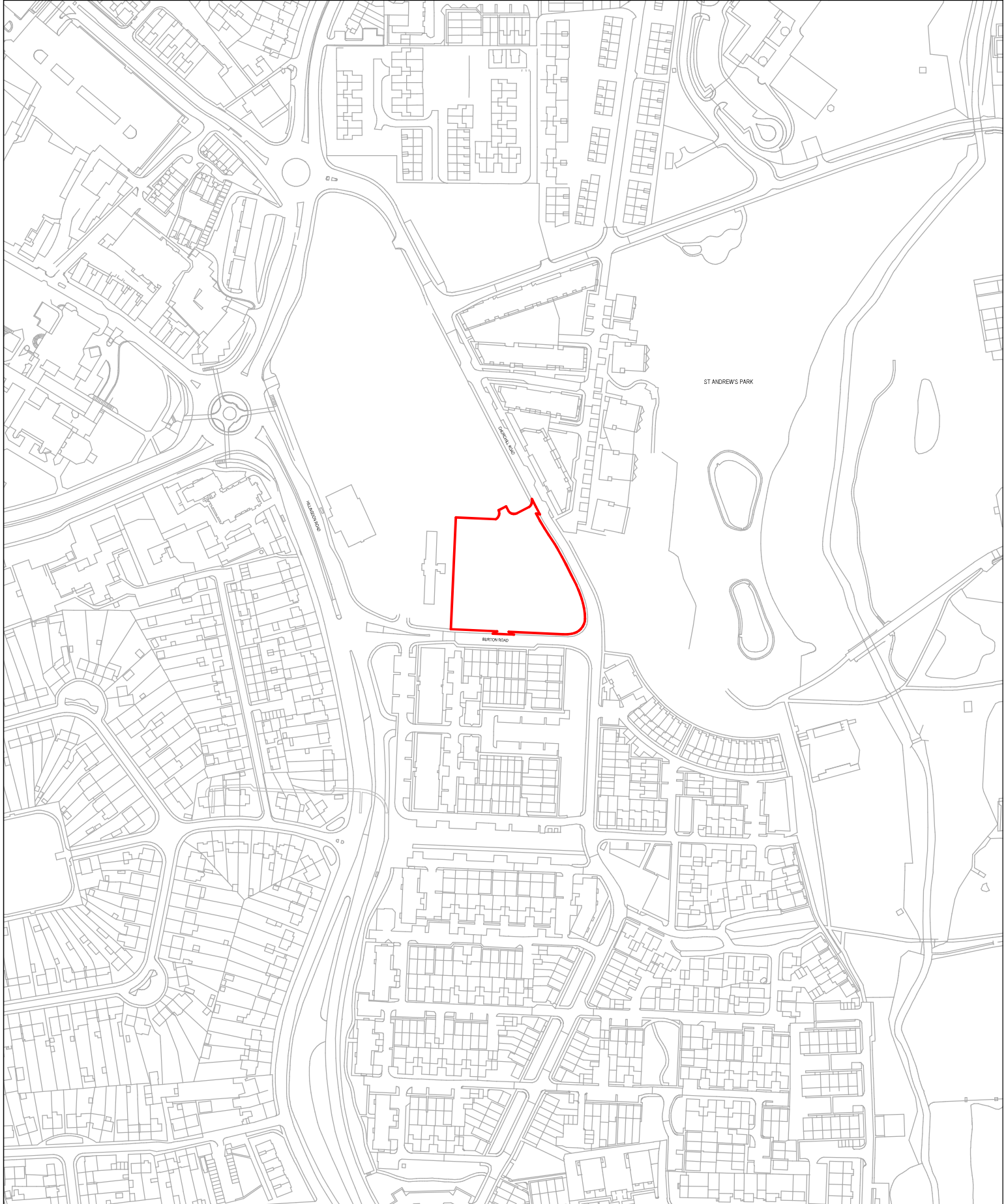


Red line planning boundary

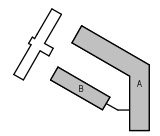


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 • THE SITE VISUALS OF CONSENT  
 • THE PROJECT COMMUNITY LETTER



NO.	DATE	DESCRIPTION	BY	CHECKED
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2	28.01.22	Issue for Planning		
3	28.01.22	Issue for Planning		
4	28.01.22	Issue for Planning		
5	28.01.22	Issue for Planning		
6	28.01.22	Issue for Planning		
7	28.01.22	Issue for Planning		
8	28.01.22	Issue for Planning		
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10	28.01.22	Issue for Planning		



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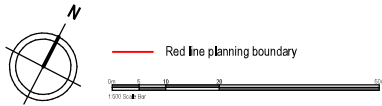


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Land East of Mons Block, St Andrew's Park  
 Reserved Matters Application  
 P3002349  
 Site Location Plan  
 Scale: 1:1250  
 Date: 28.01.22  
 Project: LEO-BDP-ZZ-RL-DR-APL-1001  
 Sheet: P03

NOTES



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Note 3 Town Centre West scheme is unbuilt

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- THE SITE CONDITIONS
- THE PROJECT COMMUNICATIONS

HILLINGDON ROAD

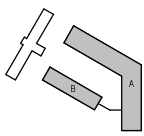
CHURCHILL ROAD

Mons Barrack Block

BURTON ROAD

Dowding Park

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002	Issue for Construction	28.01.22	...	...
003	Issue for Construction	28.01.22	...	...



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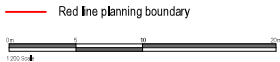
Page 126

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Land East of Mons Block, St Andrew's Park Reserved Matters Application	
PROJ NO	P3002349
DATE	28.01.22
SCALE	1:500
REV	@ A1
NO	28.01.22
NO	P04

LEO-BDP-ZZ-RL-DR-A-PL-1004



- Key**
- 1b2p
  - 2b3/4p
  - 2b4p
  - 3b4p

- Bin Store
- Cycle Store
- Store/Plant

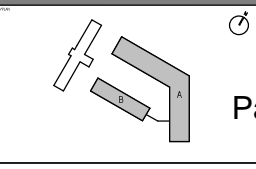
\* Type 2A units can be delivered without structural alteration as a 2-bedroom 4 person M4(2) unit or a 2-bedroom 3 person M4(3) Wheelchair User Home, N/A. 9 of the no. 13 proposed Type 2A units will be delivered as Part M4(3) Wheelchair User Homes in accordance with Condition 11. The exact location of the part M4(3) units will be confirmed prior to occupation in accordance with Condition

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- Note 3 Grey region denotes below ground area
- Note 4 Dropped kerb and tactile paving shown indicatively only

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REV	DATE	BY	CHKD	DESCRIPTION
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002	28.01.22	BDP	BDP	REVISIONS
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010	28.01.22	BDP	BDP	REVISIONS



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Land East of Mons Block, St Andrew's Park  
Reserved Matters Application

PROJ: P3002349

DATE: 28.01.22

SCALE: 1:200

REV: @ A1

28.01.22

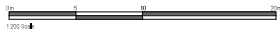
LEO-BDP-ZZ-00-DR-A-PL-1210

P09

NOTES



Red line planning boundary



Key

- 1b1p
- 2b4p
- 1b2p
- 3b4p
- 2b3-4p
- 3b5p
- 2b3p
- Bin Store

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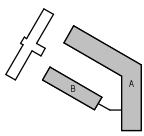
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- THE SITE SPECIFIC DESIGN STATEMENT
- THE PROJECT COMMUNICATIONS PLAN



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Land East of Mons Block, St Andrew's Park  
Reserved Matters Application

P3002349

Proposed Plan - Level 00

Scale: 1:200

Date: 28.01.22

Project: LEO-BDP-ZZ-00-DR-A-PL-1211

Sheet: P013

NOTES



Red line planning boundary

- Key
- 1b2p
  - 2b3/4p
  - 2b4p
  - 3b5p

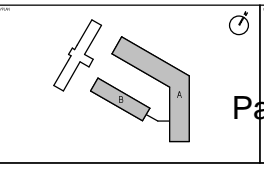
\* Type 2A units can be delivered without structural alteration as a 2 bedroom 4 person M4(2) unit or a 2 bedroom 3 person M4(3) Wheelchair User Home, N/A 9 of the no. 13 proposed Type 2A units will be delivered as Part M4(3) Wheelchair User Homes in accordance with Condition 15. The exact location of the part M4(3) units will be confirmed prior to occupation in accordance with Condition

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001	Issue for approval	28.01.22			
002	Issue for construction	28.01.22			
003	Issue for construction	28.01.22			
004	Issue for construction	28.01.22			
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007	Issue for construction	28.01.22			
008	Issue for construction	28.01.22			
009	Issue for construction	28.01.22			
010	Issue for construction	28.01.22			



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Land East of Mons Block, St Andrew's Park  
 Reserved Matters Application

P3002349

Proposed Plan - Level 01

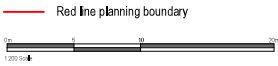
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Date: 28.01.22

LEO-BDP-ZZ-01-DR-A-PL-1212

@ A1  
 P07

NOTES



Red line planning boundary

Key

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2b3/4p	
2b4p	
3b5p	

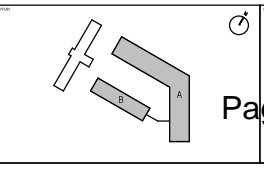
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010	Issue for Construction	28.01.22		



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Land East of Mons Block, St Andrew's Park  
 Reserved Matters Application

PROJ: P3002349

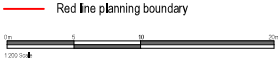
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REV: P07

LEO-BDP-ZZ-02-DR-A-PL-1213

NOTES



Red line planning boundary

Key

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2b3/4p	
2b4p	
3b5p	

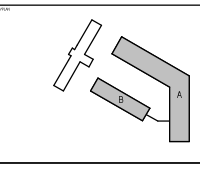
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 • THE SITE CONDITIONS AND CONSTRAINTS  
 • THE PROJECT COMMUNICATIONS



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001	ISSUE FOR PERMIT	28.01.22		
002	ISSUE FOR PERMIT	28.01.22		
003	ISSUE FOR PERMIT	28.01.22		
004	ISSUE FOR PERMIT	28.01.22		
005	ISSUE FOR PERMIT	28.01.22		
006	ISSUE FOR PERMIT	28.01.22		
007	ISSUE FOR PERMIT	28.01.22		
008	ISSUE FOR PERMIT	28.01.22		
009	ISSUE FOR PERMIT	28.01.22		
010	ISSUE FOR PERMIT	28.01.22		



5th Floor,  
 160 Great Portland  
 Street, London,  
 W1W 5QZ

**VINCI**

Page 131

**ST.MODWEN**

**BDP.**

3 St Paul's Place  
 129 Northolt Street  
 Sheffields  
 S1 2JE  
 United Kingdom  
 T +44 (0)114 273 1641  
 www.bdp.com

Land East of Mons Block, St Andrew's Park  
 Reserved Matters Application

P3002349

Proposed Plan - Level 03

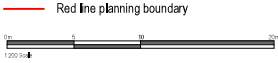
Scale: 1:200

Date: 28.01.22

LEO-BDP-ZZ-03-DR-A-PL-1214

P07

NOTES



Red line planning boundary

Key

1b2p	3b6p
2b3/4p	
2b3p	
2b4p	

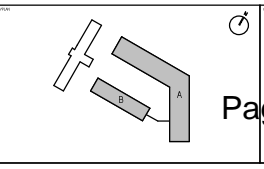
\* Type 2A units can be delivered without structural alteration as a 2 bedroom 4 person M4(2) unit or a 2 bedroom 3 person M4(3) Wheelchair User Home, No. 9 of the no. 13 proposed Type 2A units will be delivered as Part M4(3) Wheelchair User Homes in accordance with Condition 11. The exact location of the part M4(3) units will be confirmed prior to occupation in accordance with Condition 11.

Note 1 Ordnance Survey © Crown Copyright 2021. All rights reserved. Licence number 100022432  
 Note 2 Red line denotes planning boundary only

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 • THE CONTRACT DOCUMENTS PROVIDED  
 • THE SITE SURVEY AND DATA  
 • THE PROJECT COMMUNICATIONS



NO.	REVISION	DATE	BY	CHKD	APPD
001	Issue for tender	28.01.22			
002	Issue for construction	28.01.22			
003	Issue for construction	28.01.22			
004	Issue for construction	28.01.22			
005	Issue for construction	28.01.22			
006	Issue for construction	28.01.22			
007	Issue for construction	28.01.22			
008	Issue for construction	28.01.22			
009	Issue for construction	28.01.22			
010	Issue for construction	28.01.22			



5th Floor,  
 160 Great Portland  
 Street, London,  
 W1W 5QZ

**VINCI**

Page 132

**ST.MODWEN**

**BDP.**

3 St Paul's Place  
 129 Finsbury Street  
 Shoreditch  
 S1 2JE  
 United Kingdom  
 T +44 (0)114 273 1641  
 www.bdp.com

Land East of Mons Block, St Andrew's Park  
 Reserved Matters Application

PROJ: P3002349  
 DRAW: Proposed Plan - Level 04  
 DATE: 28.01.22  
 SCALE: 1:200  
 SHEET: P08

LEO-BDP-ZZ-04-DR-A-PL-1215



Context Elevation - North  
1:200

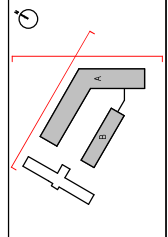


Context Elevation - East  
1:200

**NOTES**

- 1. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE SPECIFIED.
- 2. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 3. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 4. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 5. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 6. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 7. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 8. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 9. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.
- 10. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.

NO.	REVISION	DATE	BY	CHKD.
1	ISSUE FOR PERMIT	10/20/2023	MM	MM
2	ISSUE FOR PERMIT	10/20/2023	MM	MM
3	ISSUE FOR PERMIT	10/20/2023	MM	MM
4	ISSUE FOR PERMIT	10/20/2023	MM	MM
5	ISSUE FOR PERMIT	10/20/2023	MM	MM
6	ISSUE FOR PERMIT	10/20/2023	MM	MM
7	ISSUE FOR PERMIT	10/20/2023	MM	MM
8	ISSUE FOR PERMIT	10/20/2023	MM	MM
9	ISSUE FOR PERMIT	10/20/2023	MM	MM
10	ISSUE FOR PERMIT	10/20/2023	MM	MM



5th floor  
100 Broadford  
Sheffield S1 2JZ  
WWW.BDP.CO.UK

**VINCI**

**ST.MODWEN**

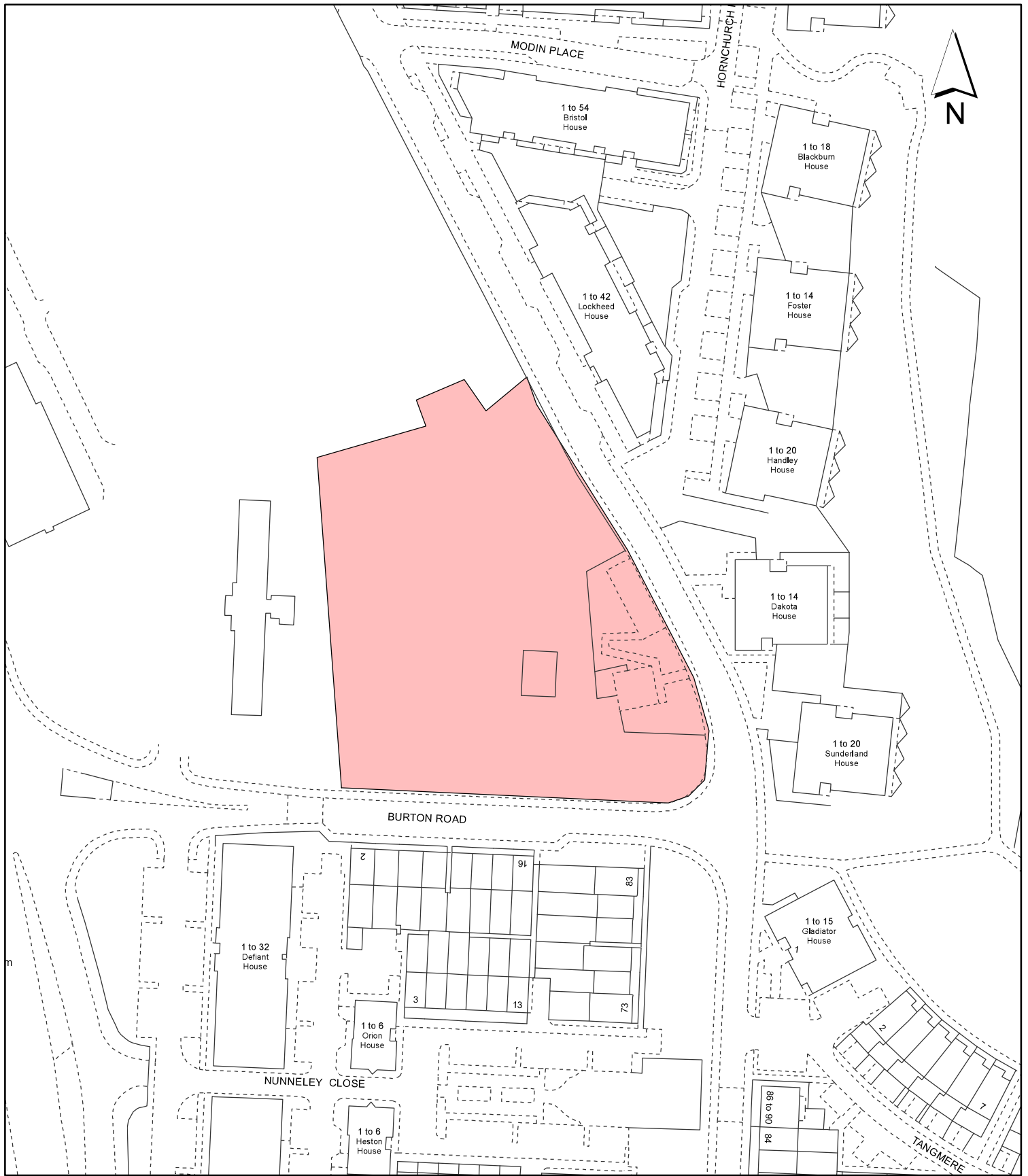
**BDP.**

3 St Pauls Place  
111  
Sheffield  
United Kingdom  
T: 44 (0)114 273 1841  
www.bdp.com

Land East of Mons Block, St Andrew's Park  
Reserved Matters Application  
F3002349  
Proposed Context Elevations  
North and East  
28.01.22

LEO-BDP-ZZ-EE-DRAA-P-1170 P06





**Notes:**

 Site boundary

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Site Address:

**Land East of Mons**

Planning Application Ref:  
**585/APP/2022/665**

Scale:  
**1:1,250**

Planning Committee:  
**Major Page 135**

Date:  
**February 2023**

**LONDON BOROUGH OF HILLINGDON**  
**Residents Services Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
 LONDON

## **Report of the Interim Director of Planning, Regeneration & Public Realm**

**Address** SHURGARD HOUSE, WESTMOUNT CENTRE UXBRIDGE ROAD HAYES

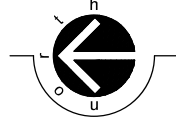
**Development:** Partial demolition and extension to existing building to provide additional self-storage floorspace (Use Class B8) with associated new car and cycle parking, refuse storage, landscaping and other associated works ancillary to the development.

**LBH Ref Nos:** 49467/APP/2022/2801

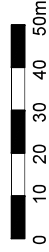
All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately. This drawing is copyright protected.

REVISION A 061022 Note Deleted HP AF

Site Boundary



SCALE 1:1250 @ A3



SCALE	DATE	DRAWN	CHECKED
1:1250	DEC/21	AF	DA

PROJECT SHURGARD SELF STORAGE  
UK04 - HAYES  
LONDON UB4 0HD

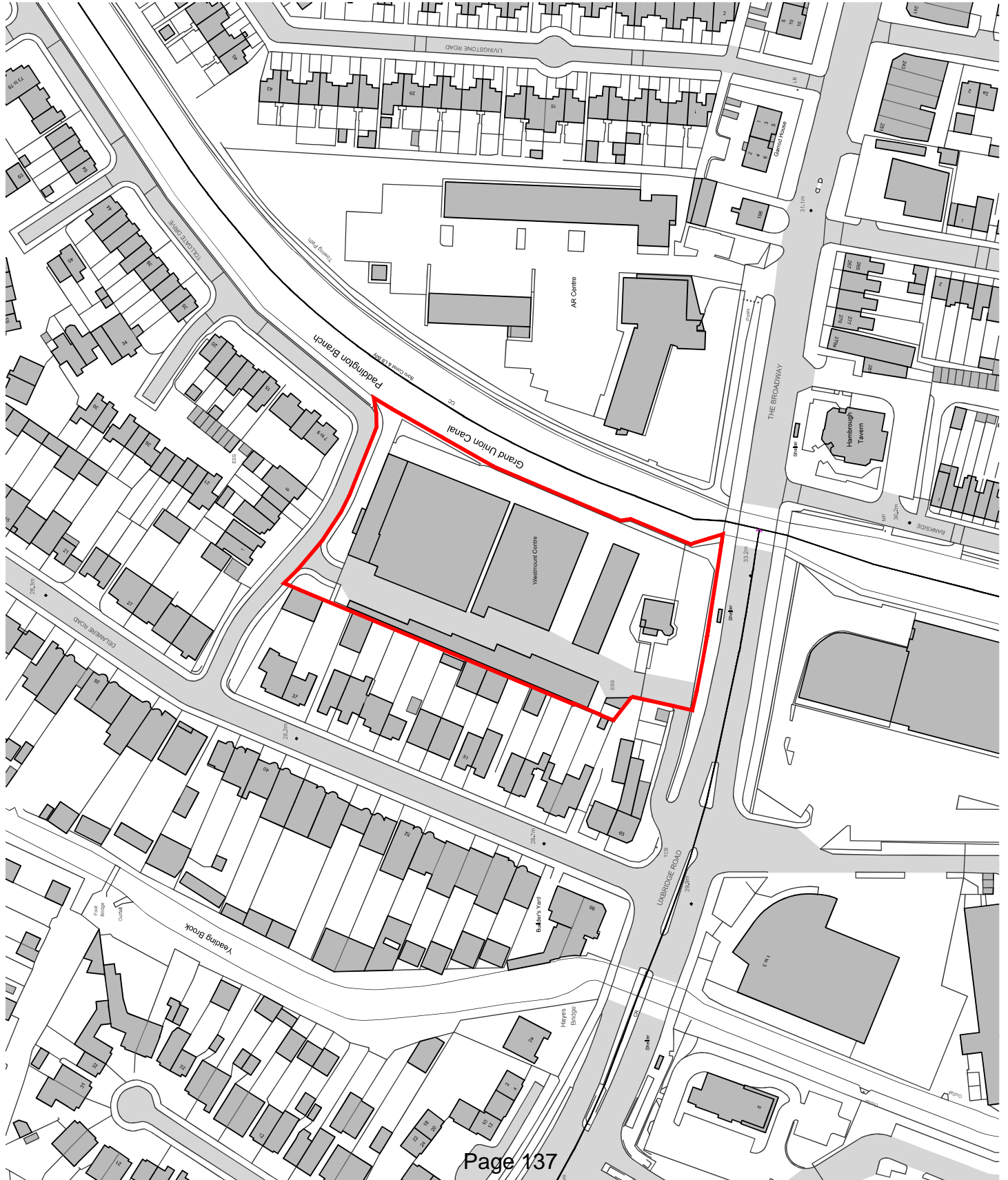
DRAWING Location Plan  
As Existing



10 MONTROSE STREET  
GLASGOW  
G1 1RE  
0141 229 7575  
www.360architecture.com

DRAWING No.

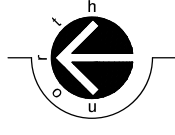
21065GA-10-001A



**NOTES** ORIGINAL A3  
 All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately.  
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**REVISION**  
 A 061022 Note Deleted HP AF

- HEALTHCARE
- RESIDENTIAL
- COMMERCIAL
- INDUSTRIAL
- RELIGIOUS
- COMMUNITY



SCALE 1:1500



Site Boundary

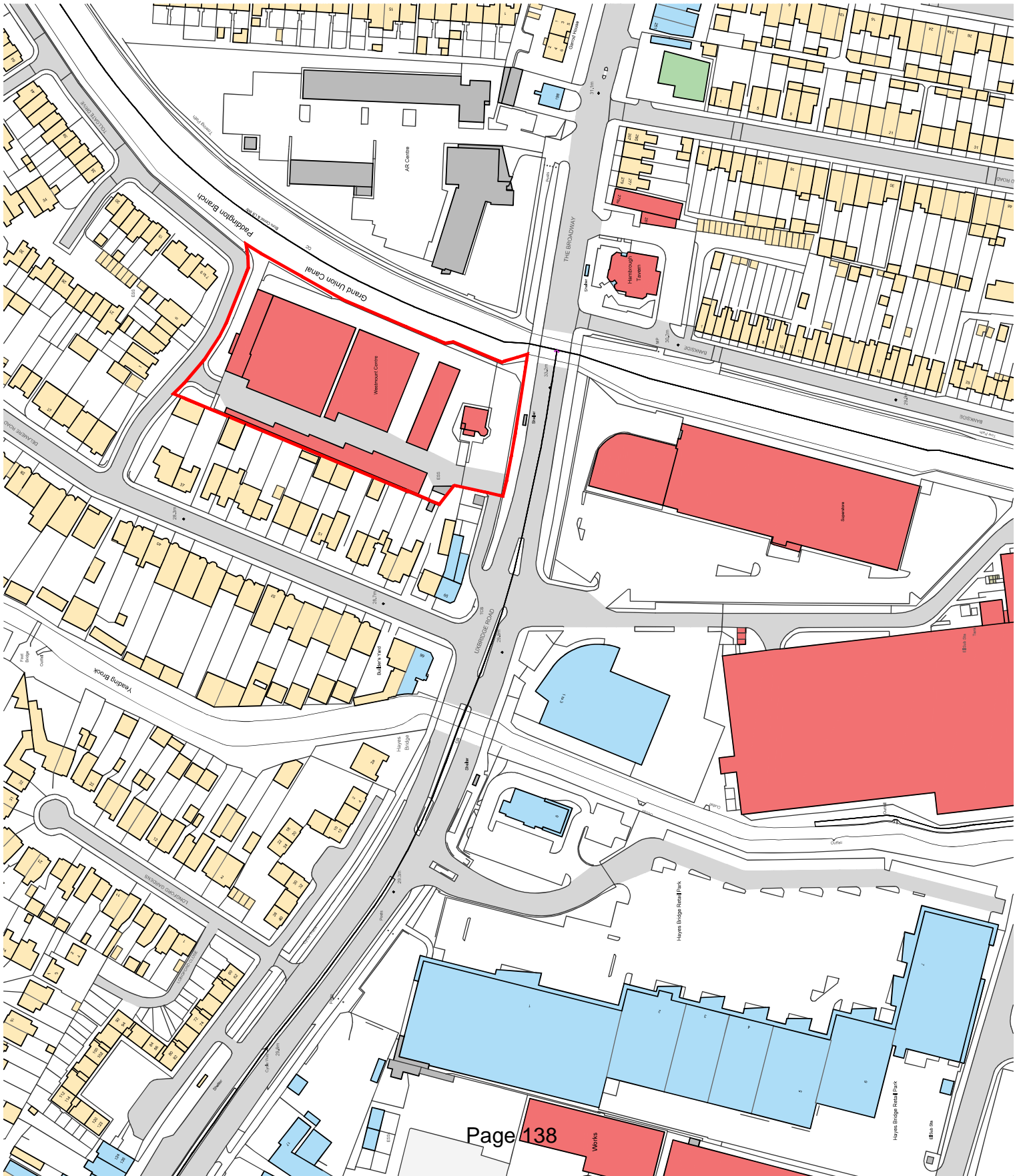
SCALE	DATE	DRAWN	CHECKED
1:1500	DEC/21	AF	DA

**PROJECT**  
 SHURGARD SELF STORAGE  
 UK04 - HAYES  
 LONDON UB4 0HD

**DRAWING**  
 Location Plan  
 Land Use

**Threesixty Architecture**  
 10 MONTROSE STREET  
 GLASGOW  
 G1 1RE  
 0141 229 7575  
 www.360architecture.com

**DRAWING No.**  
 21065GA-10-002A



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REVISION

A	260422	Layout redrawn	AF	AF
B	240022	Note Deleted	HP	AF
C	061022			

- Visitor Parking: **4 x Car space** (No electrical charging)
- Customer Parking: **15 x Car space** (No electrical charging)
- Van Parking: **A van can utilize 2 parallel parking bays**
- Bicycle Parking: None provided
- Refuse Requirement = 0.1 sqm
- Actual Refuse Store = 11m<sup>2</sup>
- Calculation: Total back of house/shop area = 57m<sup>2</sup> Storage area Req @ 2 m<sup>2</sup> / 1000m<sup>2</sup> Sum: 57/1000 x 2 = 0.114m<sup>2</sup>

LEGEND: Surface Finishes

- Road Surface
- Proposed Soft Landscaping Area Please refer to landscaping drawing for more details
- Existing buildings to be demolished. Area = 723 sqm
- Site Boundary Area = 8196 sqm



SCALE 1:500



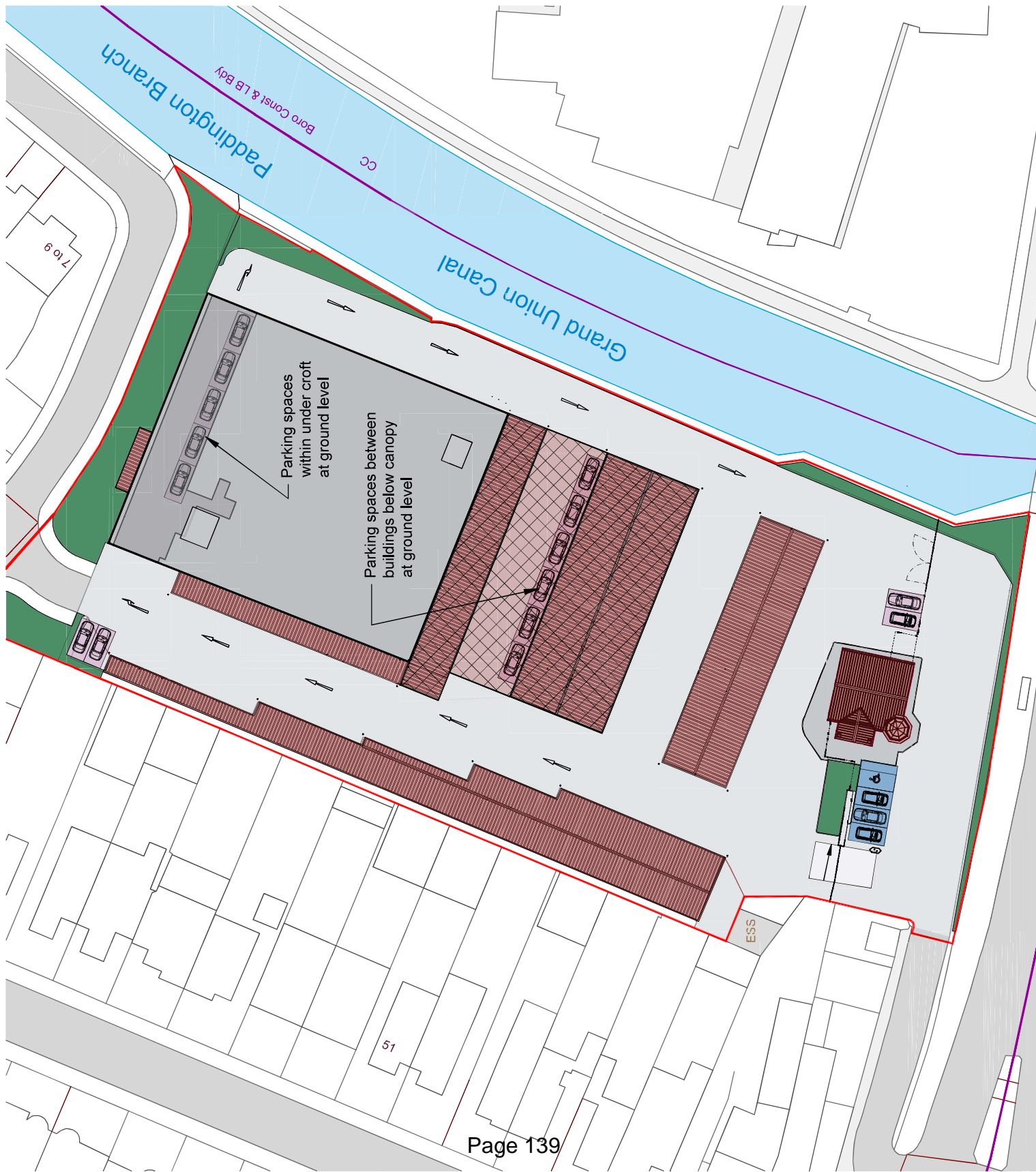
SCALE	DATE	DRAWN	CHECKED
1:500	JAN'22	AF	

PROJECT  
**SHURGD SELF STORAGE**  
**UK04 - HAYES**  
**LONDON UB4 0HD**

DRAWING  
**Site Plan As Existing**  
**with downtakings**

**Threesixty**  
**Architecture**  
 10 MONTROSE STREET  
 GLASGOW  
 G1 1RE  
 0141 229 7575  
 www.360architecture.com

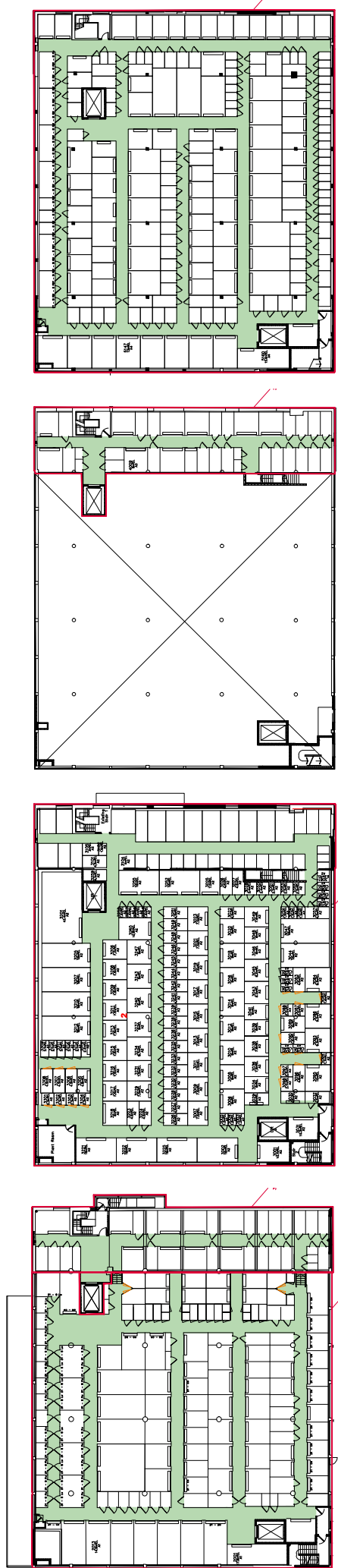
DRAWING No.  
**20165GA-10-003C**



**NOTES**

ORIGINAL A1  
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REVISION:  
 A 06/022 Note Deleted HP AF



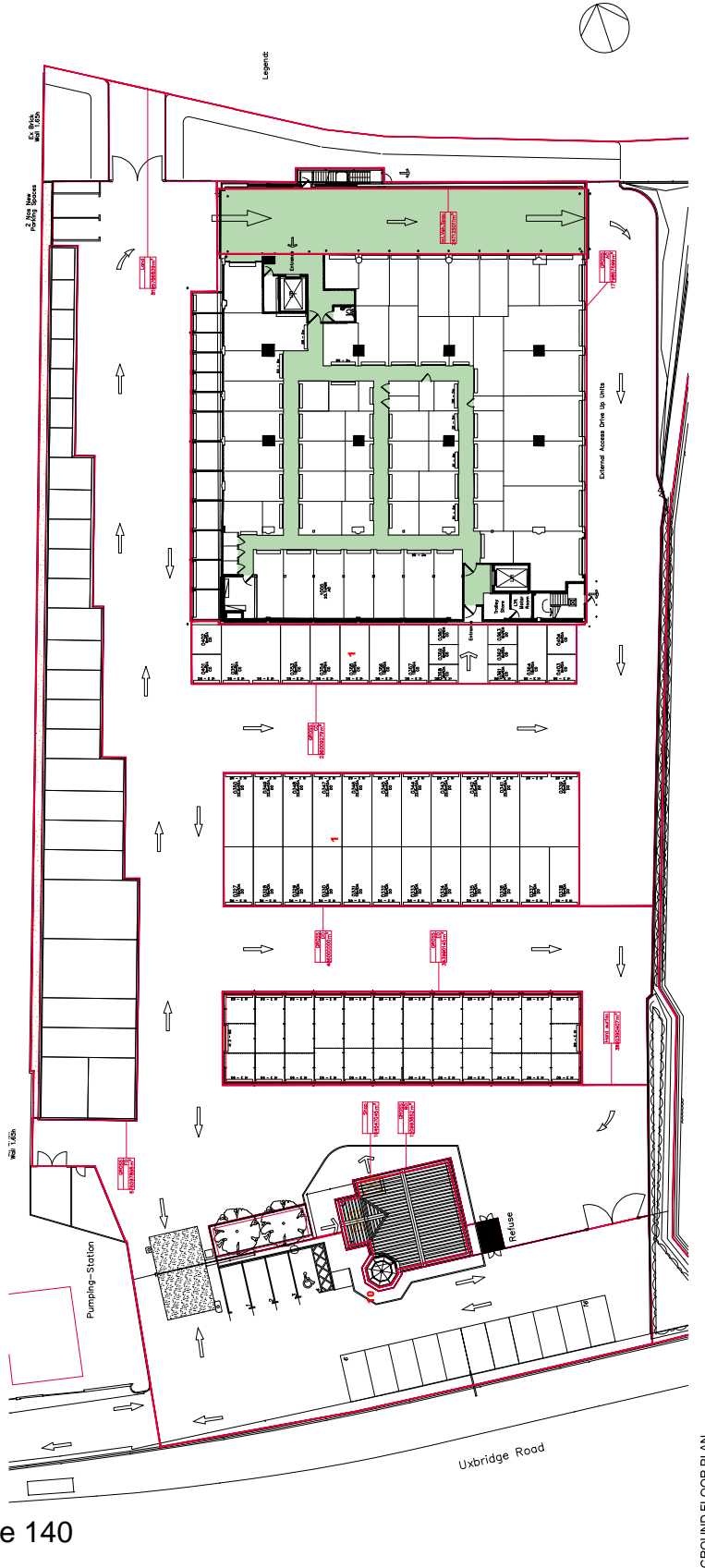
1ST FLOOR PLAN  
 2ND FLOOR PLAN  
 3RD FLOOR PLAN  
 4TH FLOOR PLAN

4TH FLOOR PLAN

3RD FLOOR PLAN

2ND FLOOR PLAN

1ST FLOOR PLAN



GROUND FLOOR PLAN



SCALE 1:250  
 0 2 4 6 8 10m

SCALE DRAWN CHECKED  
 1:250 SEPT22 AF

PROJECT  
**SHURGARD UK**  
**UK04 - HAYES**  
**LONDON UB4 0HD**

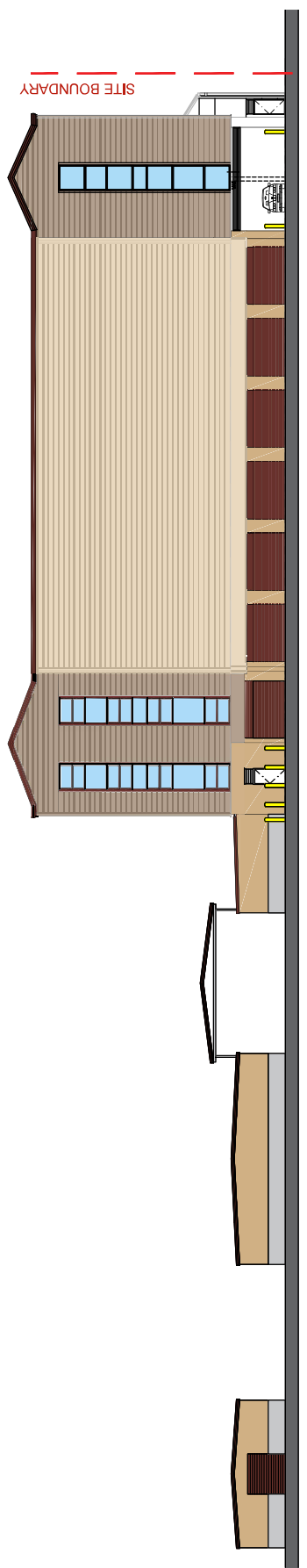
DRAWING  
**FLOOR PLANS**  
**AS EXISTING**

**Threesixty**  
**Architecture**  
 10 MONTROSE STREET  
 LONDON W14 8JG  
 020 899 5275  
 www.360architecture.com

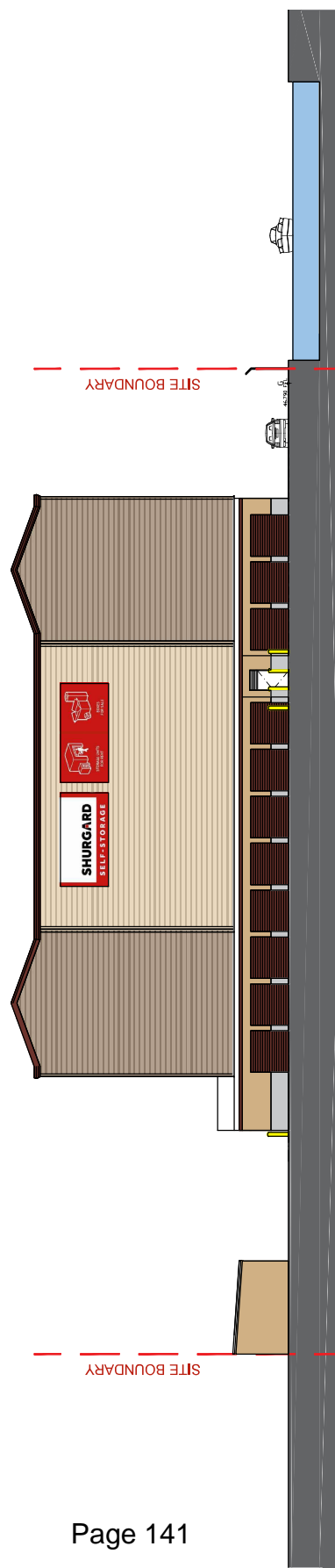
DRAWING No.  
**21065GA-10-009A**

NOTES  
All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately.  
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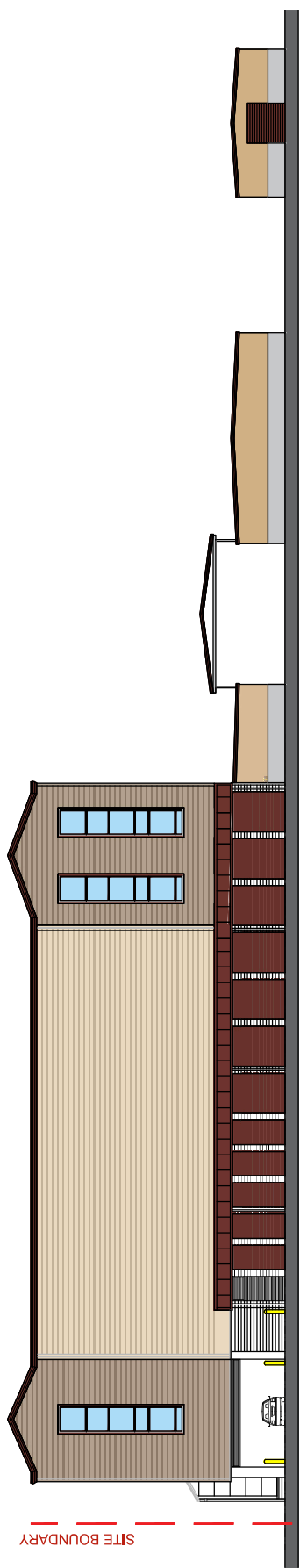
REVISION	DATE	BY	APP
1	08/10/22	Not Defined	AF / AF



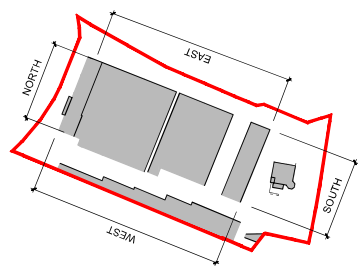
EAST ELEVATION FROM THE GRAND UNION CANAL



SOUTH ELEVATION



WEST ELEVATION



SCALE 1:150  
0 1 2 3 4 5m

SCALE	DATE	DRAWN	CHECKED
1:150	DEC'21	AF	

PROJECT  
SHURGARD UK  
UK04 - HAYES  
LONDON UB4 0HD

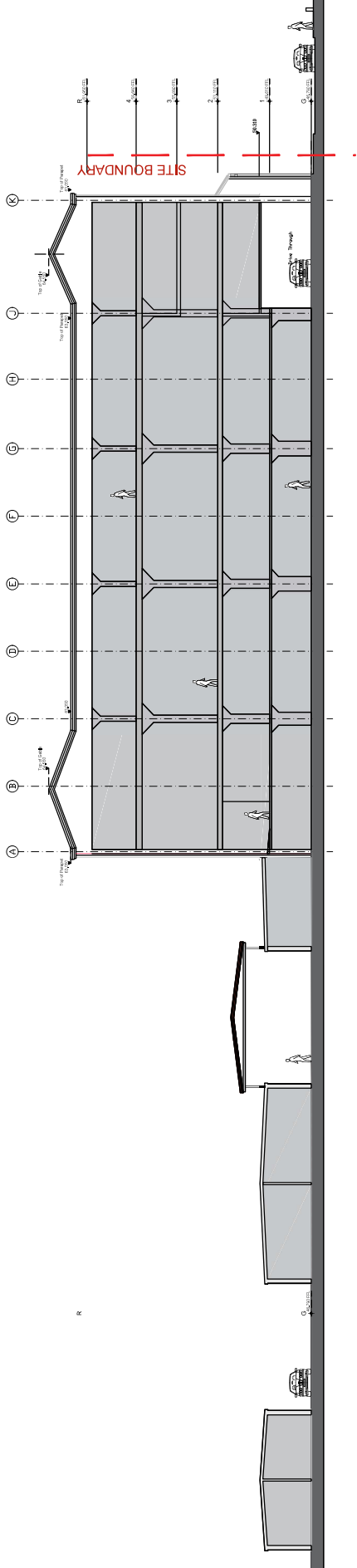
DRAWING  
EXISTING ELEVATIONS



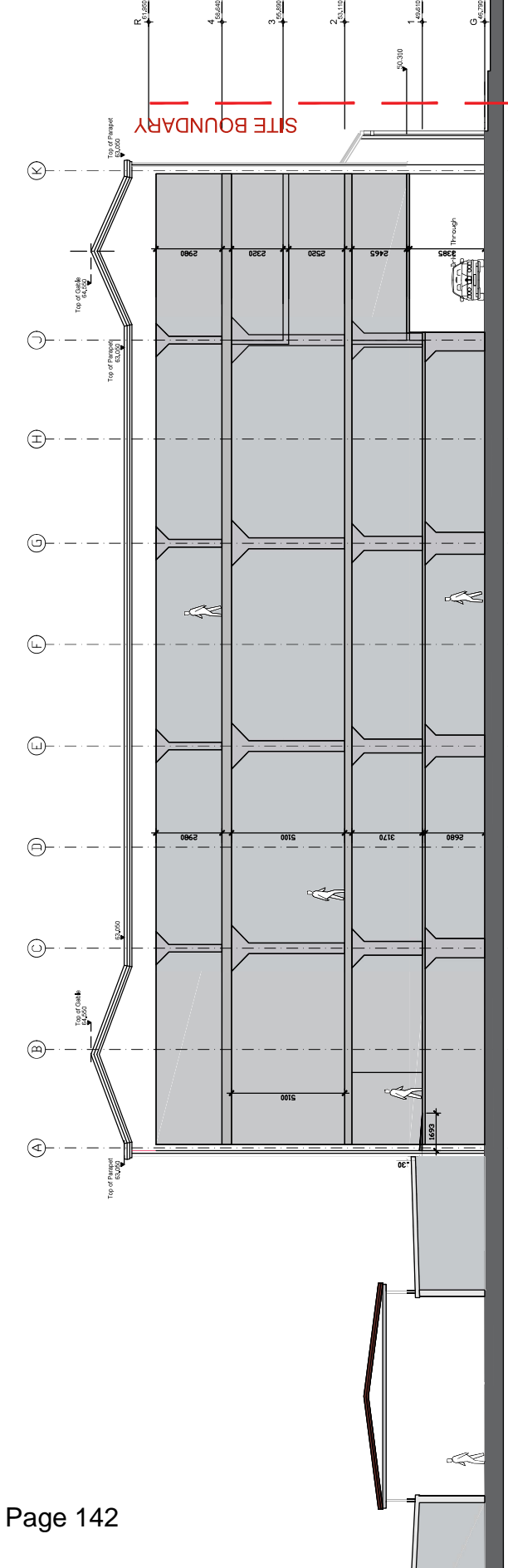
DRAWING No.  
21065GA-10-010B

NOTES  
All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately.  
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REVISION



PROPOSED LONG SECTION 1:150



SCALE: 1:50  
0 0.5 1 1.5 2 2.5m

SCALE: 1:100  
0 1 2 3 4 5m

SCALE DATE DRAWN CHECKED  
1:150 JUN22 AF

PROJECT  
SHURGARD UK  
UK04 - HAYES  
LONDON UB4 0HD  
DRAWING  
EXISTING SECTION

Threesixty Architecture  
10 MONTROSE STREET  
LONDON W14 7JW  
0144 239 7575  
www.threesixtyarch.com

DRAWING No.  
21065GA-10-006

PROPOSED LONG SECTION 1:100

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REVISION	DESCRIPTION	DATE	BY	CHECKED
A	230623	Redrawn	AF	AF
B	230622	Cycle parking adjusted	AF	AF
C	230622	Site boundary updated	AF	AF
D	170223	Block & unit parking updated	AF	AF
E	080223	Cycle provision amended	AF	AF

- Visitor Parking: **4 x Car space** (1 of which is Accessible and all electrical charging)
- Customer Parking: **16 x Car space** (2 of which are Electrical Charge points)
- Van Parking: **A van can utilize 2 parallel parking bays**
- Electrical Car "Twin" charging point
- Bicycle Parking: 24 long stay, 12 short stay of which 2 are Cargo Bikes
- Refuse Requirement = 0.1 sqm
- Actual Refuse Store = 11m<sup>2</sup>
- Calculation: Total back of house/depot area = 57m<sup>2</sup> Storage area Req @ 2 m<sup>2</sup> / 1000m<sup>2</sup> Sum: 57/1000 x 2 = 0.114m<sup>2</sup>

- LEGEND: Surface Finishes**
- Pavement (Highways Land)
  - Proposed Soft Landscaping Area
  - Please refer to landscaping drawing for more details



Site Boundary - 8196 m<sup>2</sup>  
 SCALE 1:250  
 0 2 4 6 8 10m

SCALE	DATE	DRAWN	CHECKED
1:250	Jun'22	AF	DA

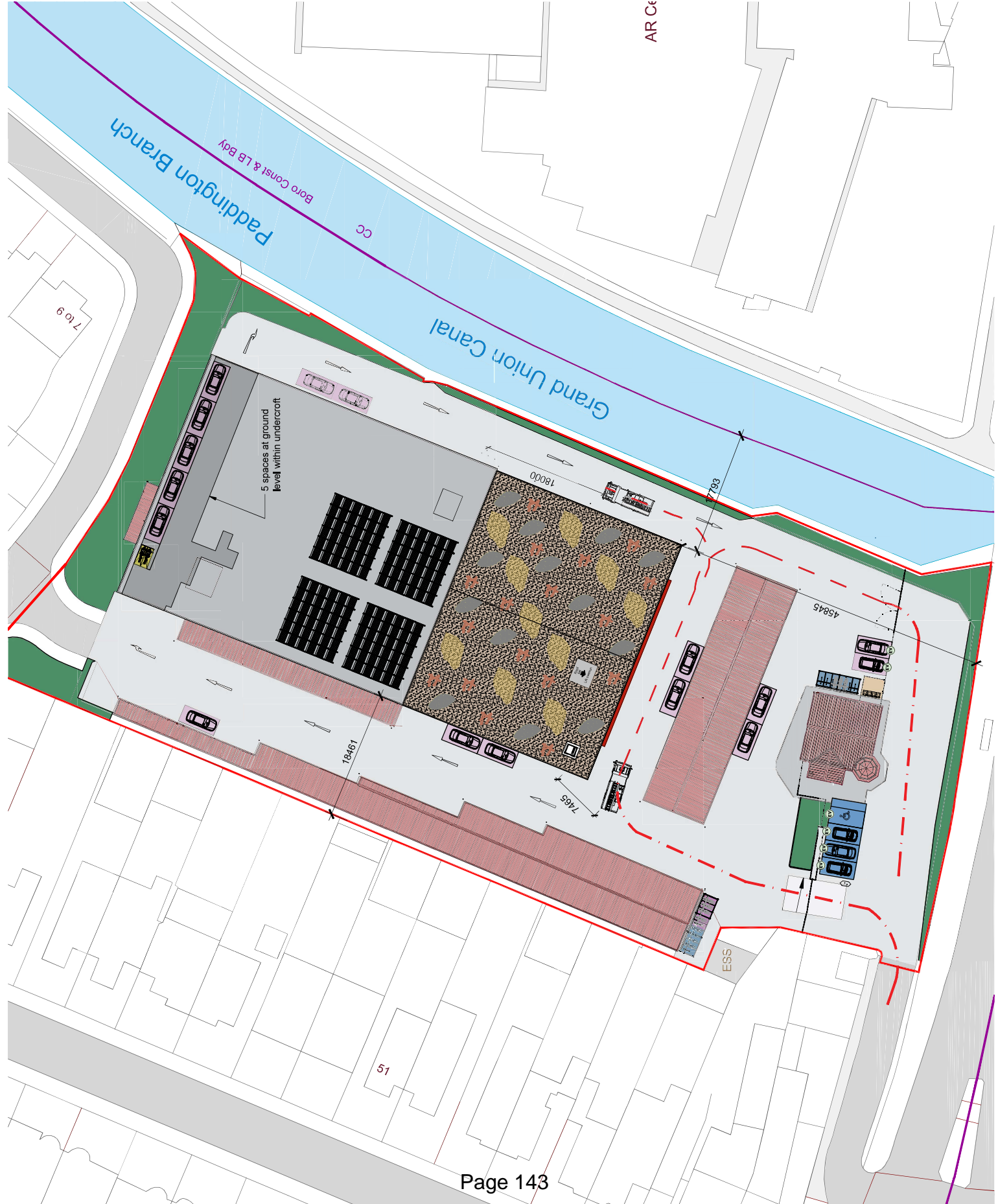
**PROJECT**  
 SHURGARD UK  
 UK04 - HAYES  
 LONDON UB4 0HD

**DRAWING**  
 Site Plan  
 As Proposed



10 MONTROSE STREET  
 LONDON W1P 9JH  
 G1 IRE  
 0141 239 7575  
 www.threesixtyarch.com

DRAWING No.  
**21065GA-D-001E**



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REVISION

A 210622 Plan updated  
 B 051022 Note Deleted

HP AF

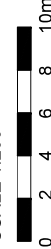
PLANNING

AREA SCHEDULE - EXTENSION ONLY

LEVEL	SEA	GIA	MIA
Ground floor	1,026 msq.	1,026 msq.	871 msq.
first floor	0 msq.	0 msq.	770 msq.
second floor	0 msq.	0 msq.	0 msq.
third floor	1,026 msq.	1,026 msq.	778 msq.
fourth floor	0 msq.	0 msq.	0 msq.
<b>TOTAL</b>	<b>3,159 msq.</b>	<b>3,078 msq.</b>	<b>2,419 msq.</b>

77% Efficiency

SCALE 1:250



SCALE 1:250  
 DATE JUN'22  
 DRAWN AF  
 CHECKED DA

PROJECT

SHURGARD UK  
 UK04 - HAYES  
 LONDON UB4 0HD

DRAWING  
 GROUND FLOOR PLAN



10 MONTROSE STREET  
 GLASGOW  
 G1 1FE  
 0141 229 7575  
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DRAWING No.

21065GA-D-010B



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REVISION

A 210622 PLAN UPDATED  
 B 051022 Note Deleted

HP AF



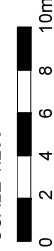
# PLANNING

AREA SCHEDULE - EXTENSION ONLY

LEVEL	GEA	GIA	NIA
ground floor	1,023 msq.	1,026 msq.	871 msq.
first floor	1,023 msq.	1,026 msq.	770 msq.
second floor	0 msq.	0 msq.	0 msq.
third floor	1,023 msq.	1,026 msq.	778 msq.
fourth floor	0 msq.	0 msq.	0 msq.
TOTAL	3,159 msq.	3,078 msq.	2,419 msq.

77% Efficiency

SCALE 1:250



SCALE 1:250  
 DATE JUN'22  
 DRAWN AF  
 CHECKED DA

PROJECT

SHURGARD UK  
 UK04 - HAYES  
 LONDON UB4 0HD

DRAWING

01 FLOOR PLAN



10 MONTROSE STREET  
 GLASGOW  
 G1 1RE  
 0141 229 7575  
 www.360architecture.com

DRAWING No.

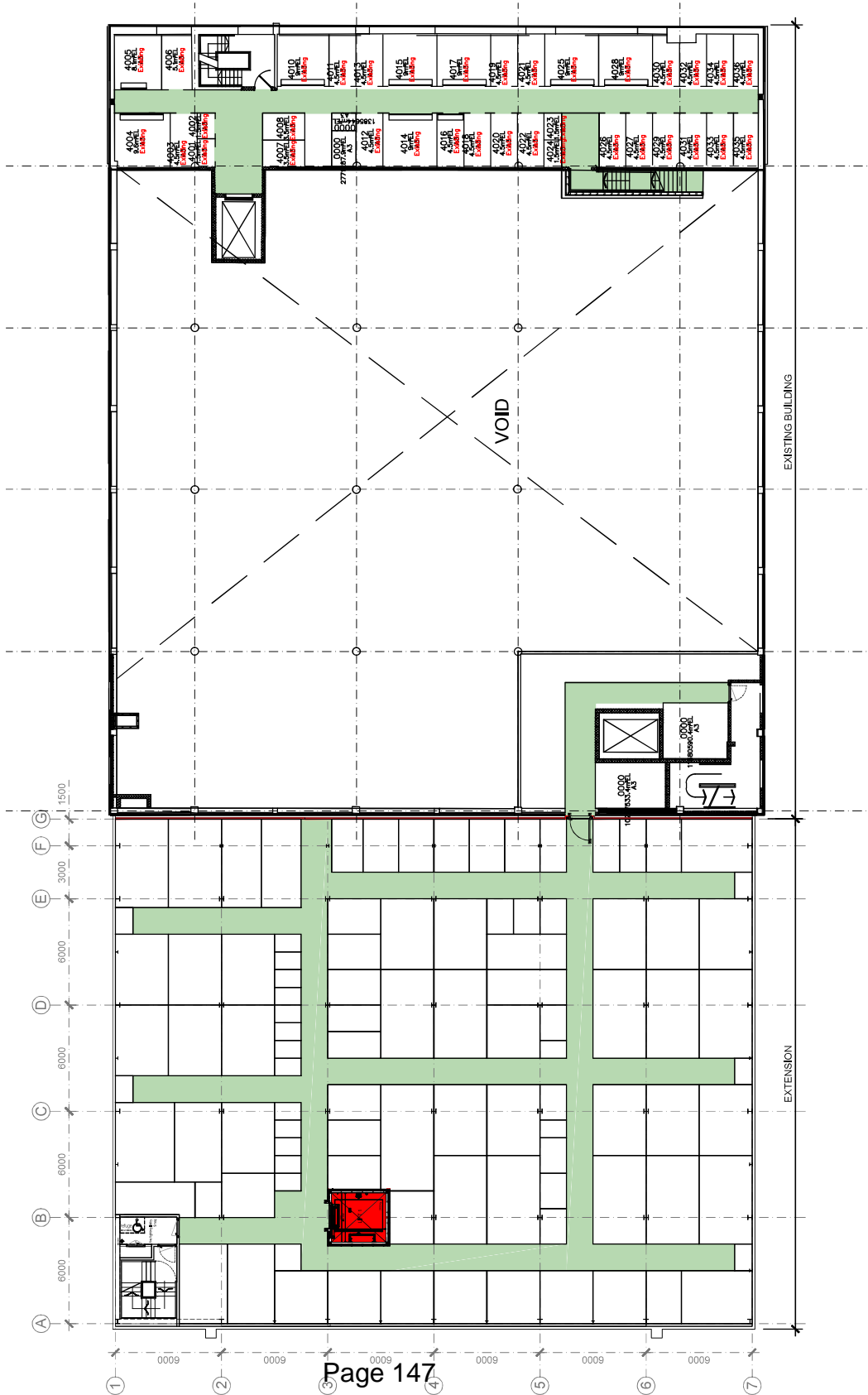
21065GA-D-011B



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REVISION  
 A 210622 PLANS UPDATED  
 B 061022 Note Deleted  
 HP AF

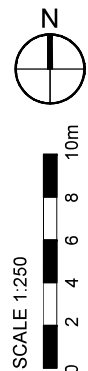


PLANNING

AREA SCHEDULE - EXTENSION ONLY

LEVEL	GFA	GIA	NIA
ground floor	1,026 msq.	1,026 msq.	871 msq.
first floor	1,026 msq.	1,026 msq.	770 msq.
second floor	0 msq.	0 msq.	0 msq.
third floor	1,026 msq.	1,026 msq.	778 msq.
fourth floor	0 msq.	0 msq.	0 msq.
TOTAL	3,078 msq.	3,078 msq.	2,419 msq.

77% Efficiency



SCALE 1:250  
 DATE JUN'21  
 DRAWN AF  
 CHECKED DA

PROJECT  
 SHURGARD UK  
 UK04 - HAYES  
 LONDON UB4 0HD  
 DRAWING  
 03 FLOOR PLAN

**NOTES** ORIGINAL A3

All levels and dimensions to be checked on site prior to construction / fabrication : report discrepancies immediately.

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**REVISION**

- A 210622 Plans updated
- B 061022 Note Deleted

HP AF



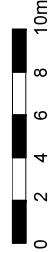
**PLANNING**

**AREA SCHEDULE - EXTENSION ONLY**

LEVEL	GEA	GIA	NIA
ground floor	1,033 msq.	1,026 msq.	871 msq.
first floor	1,033 msq.	1,026 msq.	770 msq.
second floor	0 msq.	0 msq.	0 msq.
third floor	3,093 msq.	3,026 msq.	278 msq.
fourth floor	0 msq.	0 msq.	0 msq.
<b>TOTAL</b>	<b>5,159 msq.</b>	<b>5,078 msq.</b>	<b>2,419 msq.</b>

77% Efficiency

SCALE 1:250



SCALE 1:250  
DATE JUN'22  
DRAWN AF  
CHECKED DA

**PROJECT**

**SHURGARD UK  
UK04 - HAYES  
LONDON UB4 0HD**

**DRAWING  
04 FLOOR PLAN**



10 MONTROSE STREET  
GLASGOW  
G1 1RE  
0141 229 7575  
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DRAWING No.

**21065GA-D-014B**

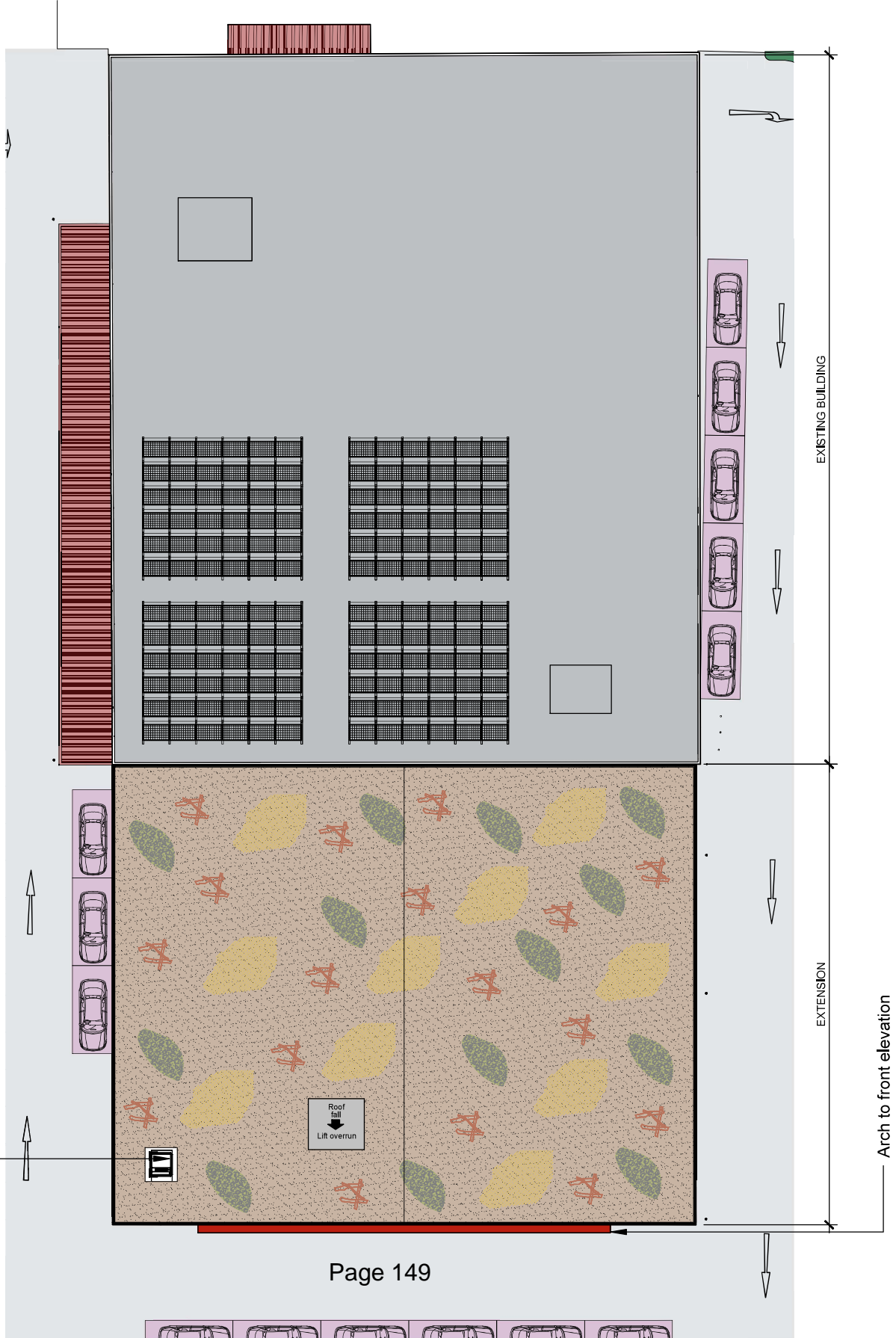
All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately.

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REVISION

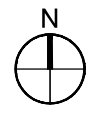
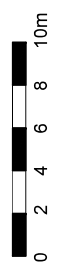
A 061022 Note Deleted HP AF

Access hatch to roof



- KS 1000TD - SINGLE PLY INSULATED ROOF-DECK. COLOUR RAL 7047 - 11 sqm. TO LIFT OVERRUN
- PHOTO-VOLTAIC ROOF PANELS TO SPECIALIST SPECIFICATION. 250 sqm.
- BID-DIVERSE ROOF TO SPECIALIST SPECIFICATION. 1017 sqm.

SCALE 1:250



SCALE	DATE	DRAWN	CHECKED
1:250	JUN'21	AF	DA

PROJECT  
**SHURGARD UK**  
**UK04 - HAYES**  
**LONDON UB4 0HD**

DRAWING  
**Roof Plan**

**Threesixty Architecture**  
 10 MONTROSE STREET  
 GLASGOW  
 G1 1RE  
 0141 229 7575  
 www.360architecture.com

DRAWING No.  
**21065GA-D-015A**

Arch to front elevation

**NOTES**  
 All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately.  
 This drawing is copyright protected.  
 REVISION: A 06/02/21 Not Definit HP AF

**MATERIALS KEY:**  
 1- PROFILES METAL COMPOSITE WALL CLADDING PANEL.  
 2- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 3- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 4- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 5- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 6- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 7- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 8- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 9- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 10- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.

**2- FLAT METAL COMPOSITE WALL CLADDING PANEL:**  
 1- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 2- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 3- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 4- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 5- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 6- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 7- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 8- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 9- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 10- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.

**3- PROFILES METAL COMPOSITE SYSTEM:**  
 1- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 2- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 3- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 4- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 5- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 6- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 7- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 8- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 9- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.  
 10- PROFILES ALUMINIUM ARCHITECTURAL WALL PANELS.

**4- PANEL FINISH TO EXTERIOR FACADES:**  
 Panels toRAL 6000 to match existing facade.  
 5- EXTERIOR ACCESS PANELS.  
 6- EXTERIOR DOOR.  
 7- EXTERIOR WINDOW.  
 8- EXTERIOR WINDOW.  
 9- EXTERIOR WINDOW.  
 10- EXTERIOR WINDOW.

**5- EXTERIOR ACCESS PANELS:**  
 Panels toRAL 6000 to match existing facade.  
 6- EXTERIOR DOOR:  
 Color to match existing door panel.  
 7- EXTERIOR WINDOW:  
 Color to match existing window panel.  
 8- EXTERIOR WINDOW:  
 Color to match existing window panel.  
 9- EXTERIOR WINDOW:  
 Color to match existing window panel.  
 10- EXTERIOR WINDOW:  
 Color to match existing window panel.

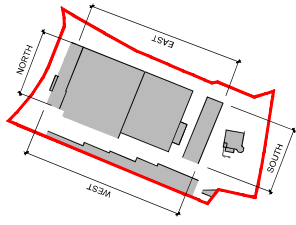
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 Color to match existing window panel.  
 7- EXTERIOR WINDOW:  
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 9- EXTERIOR WINDOW:  
 Color to match existing window panel.  
 10- EXTERIOR WINDOW:  
 Color to match existing window panel.

**7- EXTERIOR WINDOW:**  
 Color to match existing window panel.  
 8- EXTERIOR WINDOW:  
 Color to match existing window panel.  
 9- EXTERIOR WINDOW:  
 Color to match existing window panel.  
 10- EXTERIOR WINDOW:  
 Color to match existing window panel.

**8- EXTERIOR WINDOW:**  
 Color to match existing window panel.  
 9- EXTERIOR WINDOW:  
 Color to match existing window panel.  
 10- EXTERIOR WINDOW:  
 Color to match existing window panel.

**9- EXTERIOR WINDOW:**  
 Color to match existing window panel.  
 10- EXTERIOR WINDOW:  
 Color to match existing window panel.

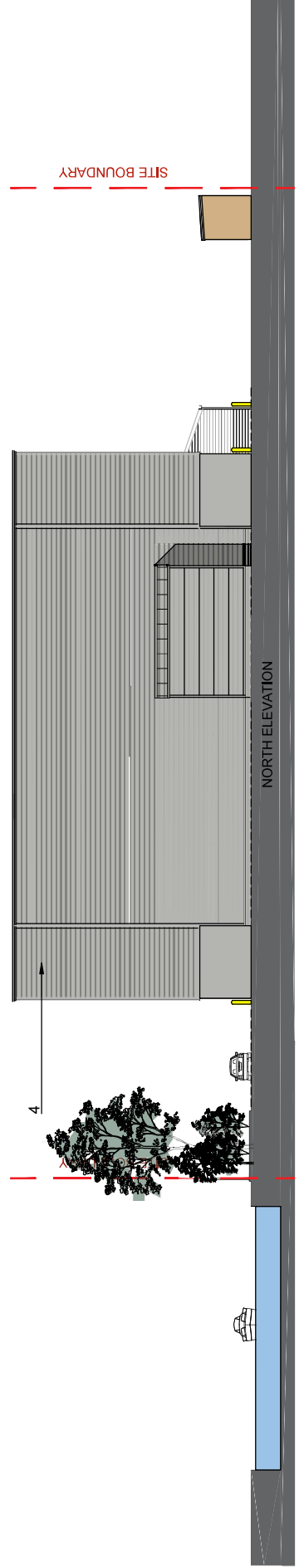
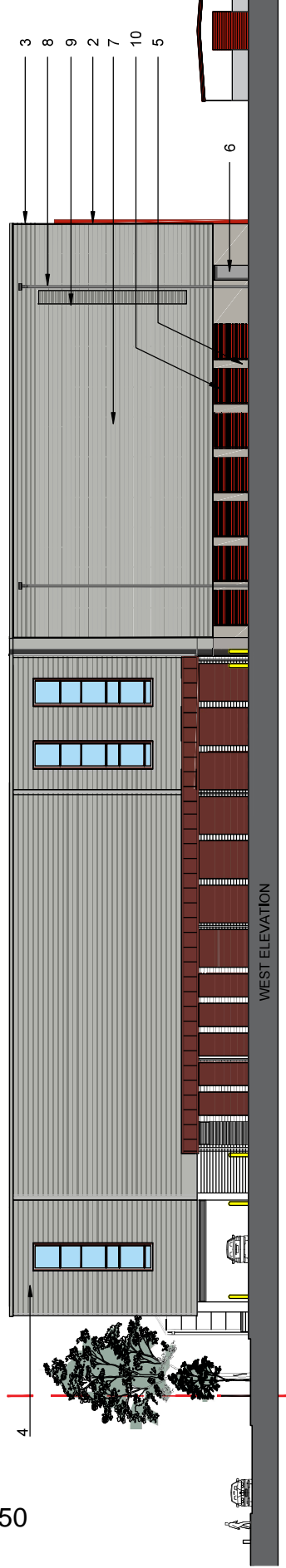
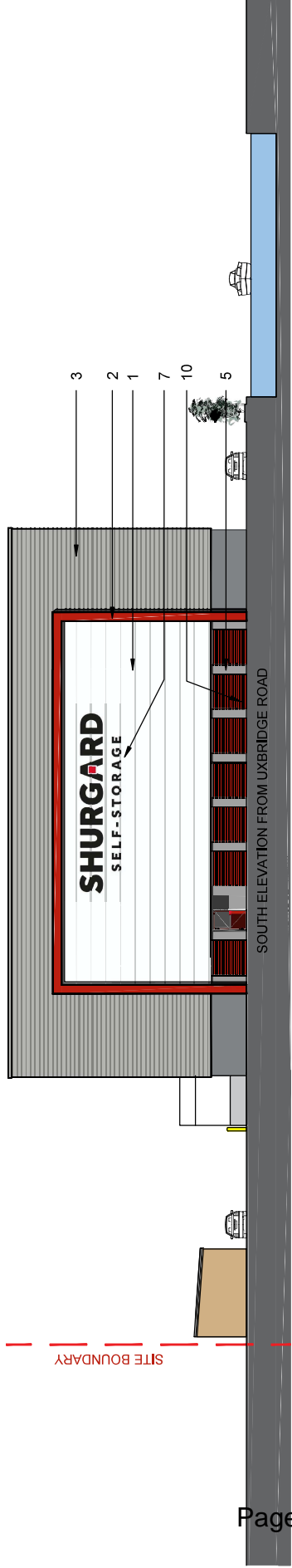
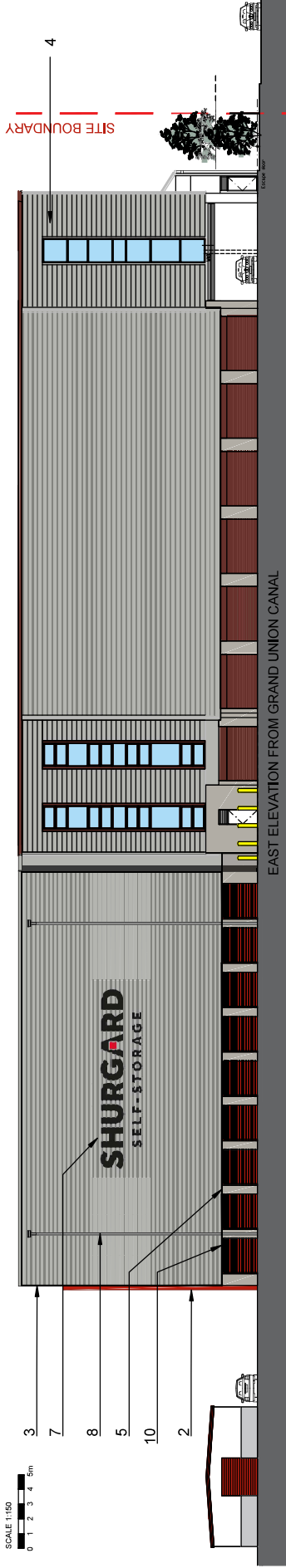
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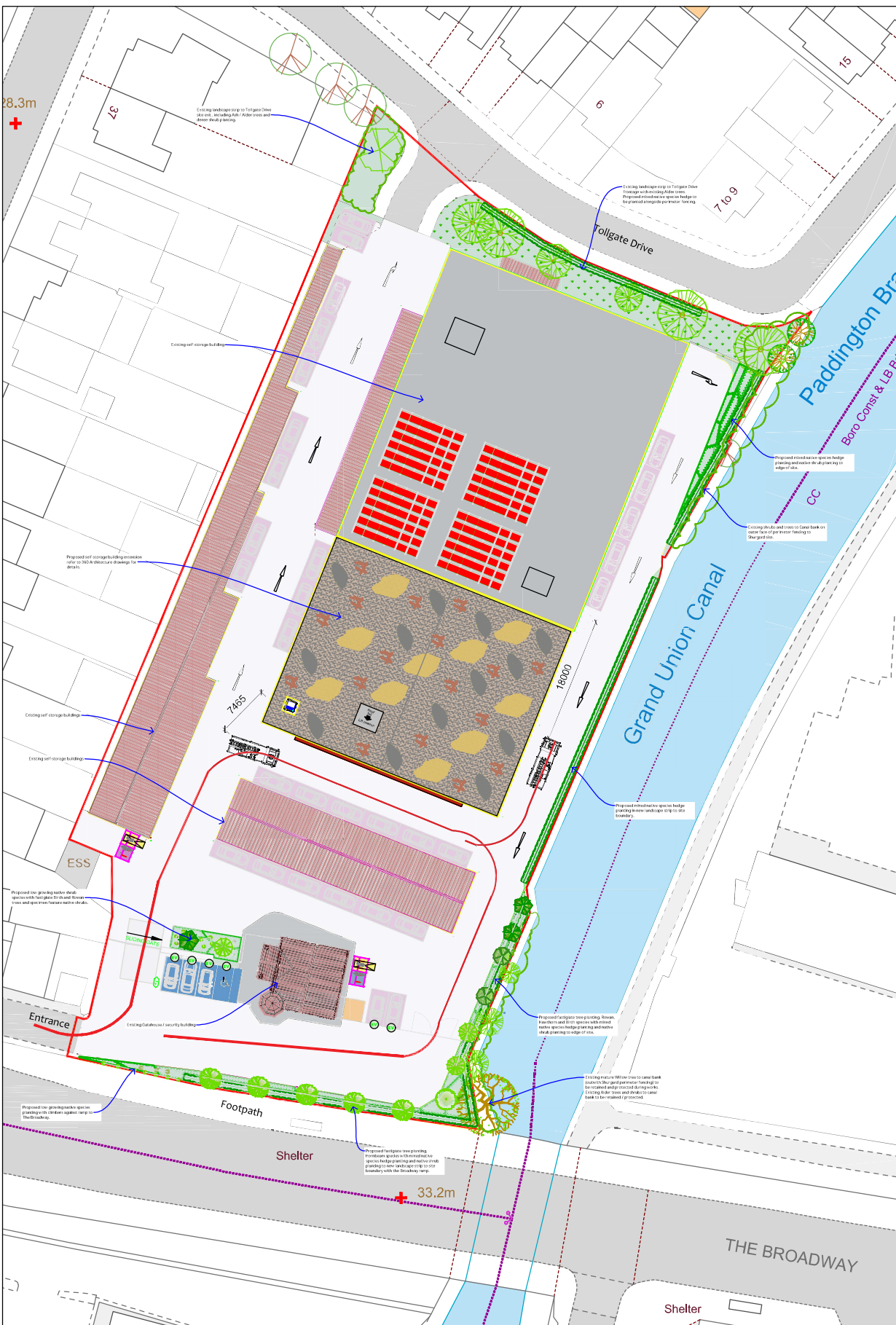
SCALE 1:150 DRAWN DEC 21 CHECKED AF

PROJECT SHURGARD UK  
 UK04 - HAYES  
 LONDON UB4 0HD  
 DRAWING PROPOSED ELEVATIONS

Threesixty Architecture  
 10 MONTROSE STREET  
 LONDON W1V 0JY  
 G1 1RE  
 0144 239 7575  
 www.threesixtyarchitecture.com  
 DRAWING No. 21065GA-D-003A

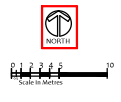






- KEY**
- Existing canal side trees and shrub layers including Willows, Alder and Cherry trees. Existing trees at Tollygate Drive frontage, Alder and Ash species with shrub planting. (Indicative locations shown.)
  - Proposed 3.3-5m tall selected standard fastigate tree planting: Birch, Hornbeam, Rowan, Oak and Hawthorn trees.
  - Proposed mixed native species hedging, maintained at 1.5m and 1.8m high; Guelder Rose, Hawthorn, Sloe, Hazel, Holly, Dog Rose and Honeysuckle.
  - Proposed low growing native species shrubs\* < 1m, planted @ 4 / m<sup>2</sup>.
  - Proposed medium / tall growing native species shrubs\* > 1m, planted @ 3 / m<sup>2</sup>.
  - Proposed medium growing specimen native species shrubs\* > 2m.
  - Proposed climbers planted at the Uxbridge Road (Ramp side) boundary.
  - Existing landscape strip to Tollygate Drive including retained Alder trees.

PROPOSED SELF-STORAGE FACILITY - UK-04, HAYES - SOFT LANDSCAPE PLAN 1:200 SCALE



Revisions

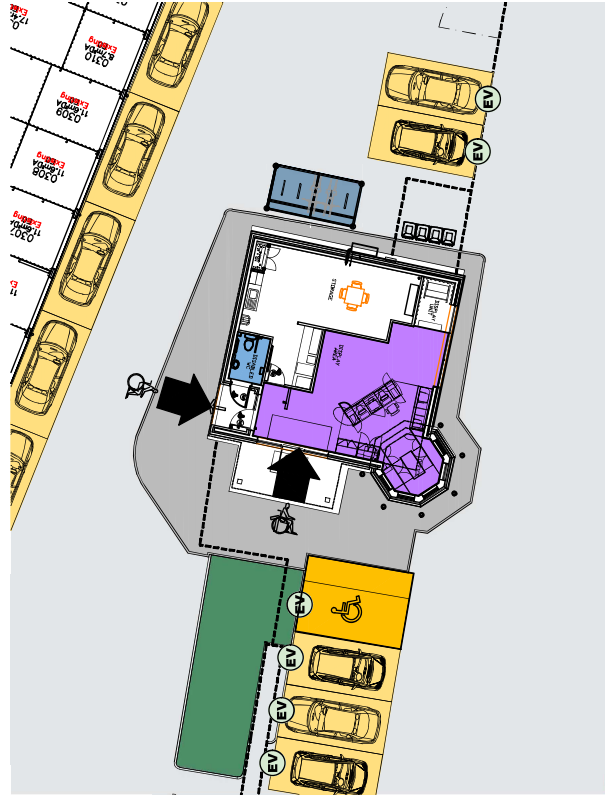
**HETTEL WOOD LANDSCAPE DESIGN**

3, Old Brunnet Cottage, Belmont,  
 25, Forence, Glasgow, G54 4AR  
 Tel: 01360 420358 Fax: 01360 424586  
 email: h.w@hettelwoodlandscape.co.uk  
 www.hettelwoodlandscape.co.uk

Project Title: PROPOSED SELF-STORAGE FACILITY - UK-04, HAYES, LEICESTERSHIRE	
Client: SHURBARD UK	
Drawing Title: LANDSCAPE PROPOSALS	
Date: 27/04/22	
Scale: 1:200	Sheet: 1/100
Drawing No: SH-2022-SE-03	Rev: 01

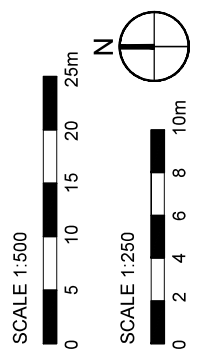
**NOTES** ORIGINAL A3  
 All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately.  
 This drawing is copyright protected.

**REVISION**  
 A 061022 Note Deleted HP AF



**SHOP PLAN AS EXISTING**

- KEY:**
- SHURGARD CAR PARKING BAYS
  - SHURGARD ACCESSIBLE PARKING BAYS
  - 7.5T VEHICLE
  - 4.5T VEHICLE
  - CUSTOMER SHOP
  - 1500mm circulation corridors
  - Customer Lifts
  - E.LEX. Stair Corres
  - Accessible WC
  - Public Footpath
  - Level Access Routes
  - Level Access Routes 1:2% Gradient



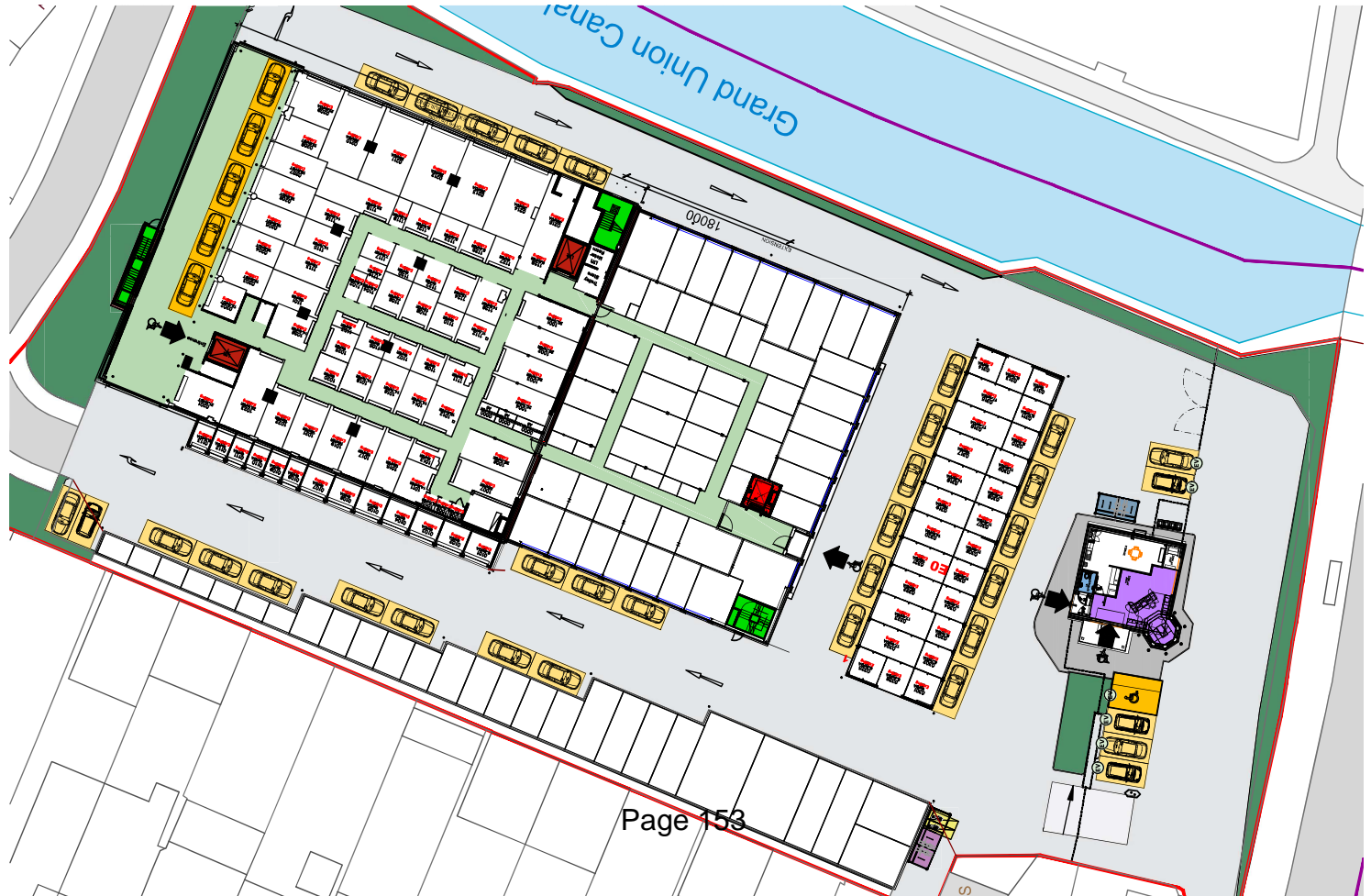
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1:250	280622	AF	DA

**PROJECT**  
 SHURGARD UK  
 UK04 - HAYES  
 LONDON UB4 0HD

**DRAWING**  
 ACCESS PLAN

**Threesixty Architecture**  
 10 MONTROSE STREET  
 GLASGOW  
 G1 1FE  
 0141 229 7575  
 www.360architecture.com

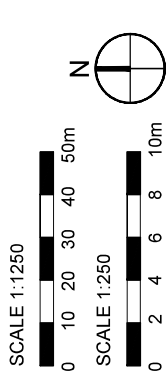
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REVISION A 061022 Note Deleted HP AF



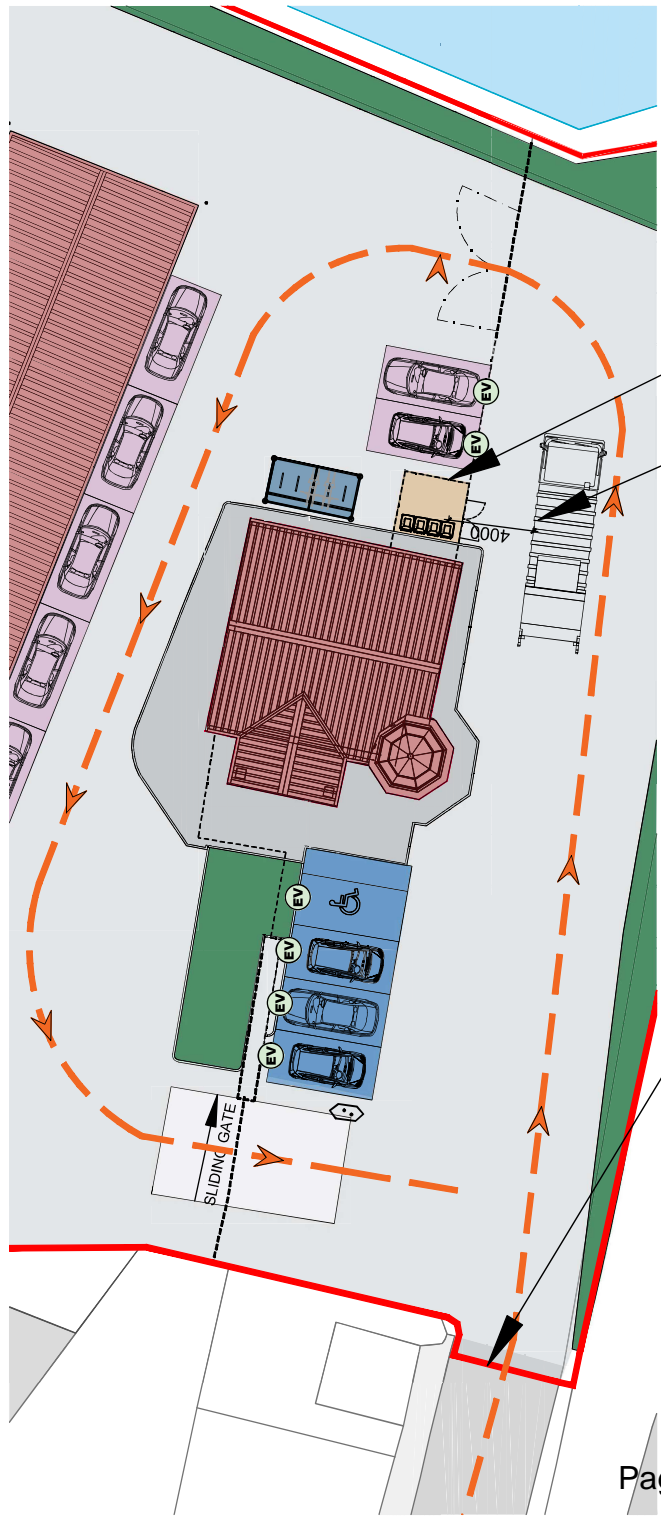
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1:250	280622	AF	DA

PROJECT  
**SHURGARD UK**  
**UK04 - HAYES**  
**LONDON UB4 0HD**

DRAWING  
**REFUSE STRATEGY PLAN**

**Threesixty Architecture**  
 10 MONTROSE STREET  
 GLASGOW  
 G1 1FE  
 0141 229 7575  
 www.360architecture.com

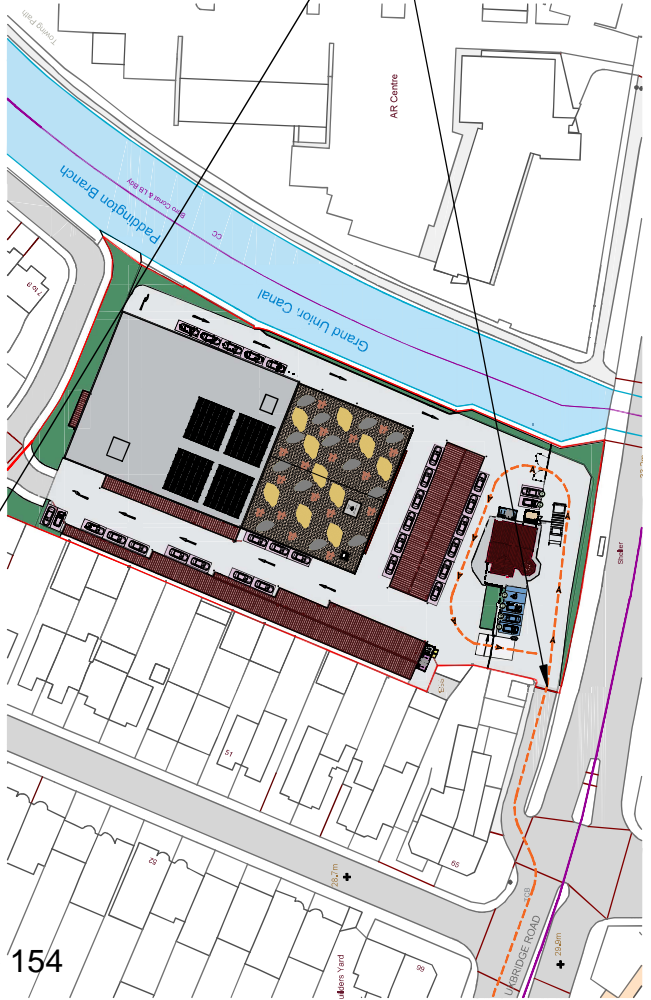
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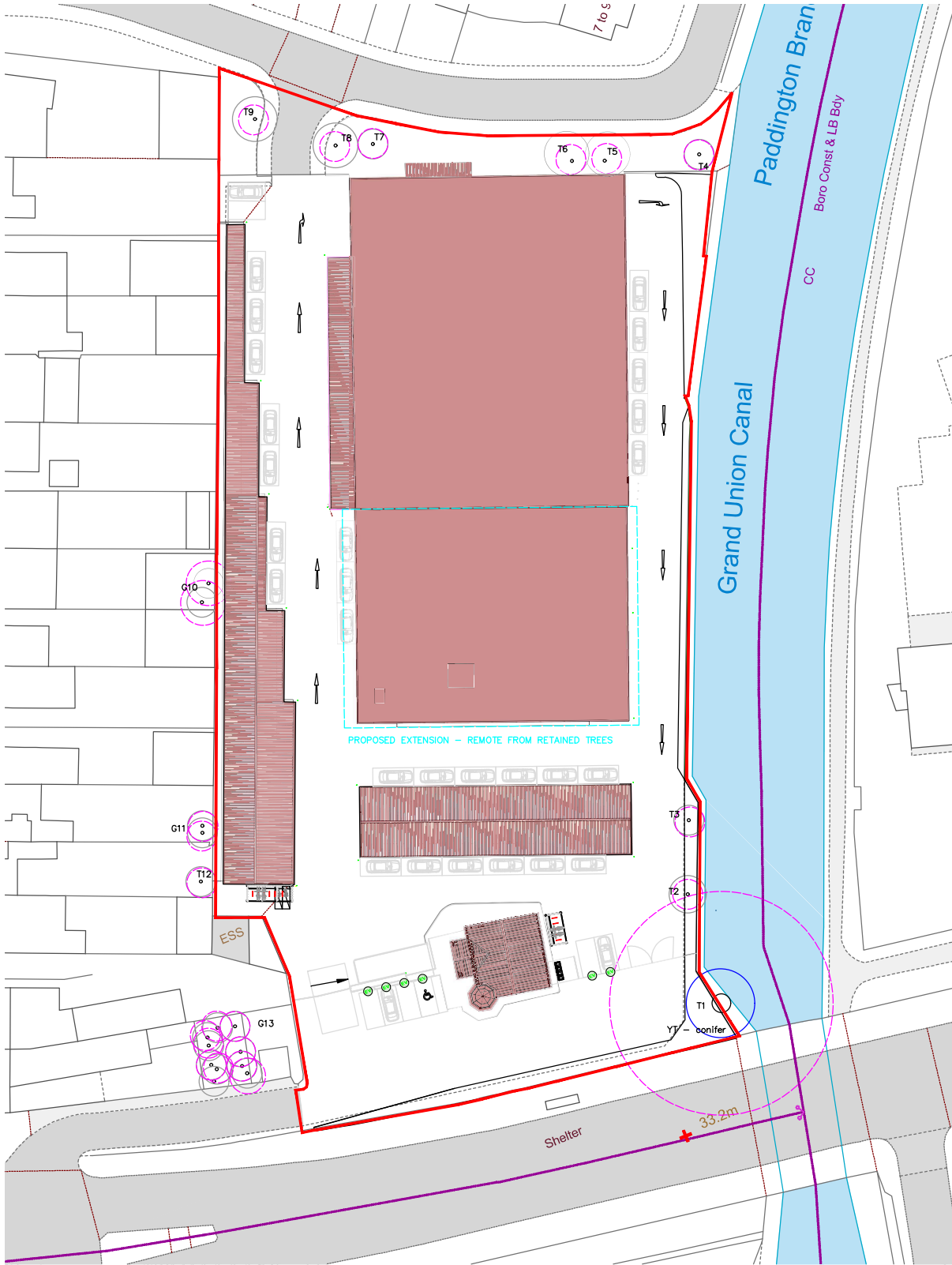
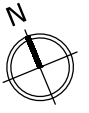


- Bin Store**  
 Space for 4 bins:
- Glass
  - Paper
  - General
  - Plastic

**Vehicle Collection point.**  
 4m drag for local authority collection operatives

**Access slip road from Uxbridge Road. Egress and Access unimpacted by proposed works.**





0 5 10 metres

- Key**
- T1 Stem position and tree number (stem diameter to scale)
  - Canopy spread of tree, colour coded according to BS 5837 category (below)
  - Notional Root Protection Area (RPA) as defined by BS 5837:2012
  - Proposal for extension
  - Site boundary in red

- BS 5837 Tree Quality**  
Categorisation (from BS 5837:2012 Table 1)
- Category U: Trees in such condition that they cannot realistically be retained in their current context for longer than 10 years
  - Category A: Trees of high quality with an estimated life expectancy exceeding 40 years
  - Category B: Trees of moderate quality with an estimated life expectancy of at least 20 years
  - Category C: Trees of low quality with an estimated life expectancy of at least 10 years, or young trees with a stem diameter below 150mm

**ARBORICULTURAL IMPACT SCHEDULE**

Tree Number	Species (Common/Botanical)	Tree Age/Class	Tree Diameter (cm)	Height (m)	Canopy Spread (m)	Canopy Cover (%)	Health (1-5)	Quality (1-5)	Category	RPA Value (m)	Location (Address)	Pruning (Type/Date)	Impact on Tree	Notes
T1	Yew (Taxus baccata)	SS	150	10	4.5	2	DM	2040	C1	10	None	None	None	Retain existing tree following proposed extension. No pruning required.
T2	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
T3	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
T4	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
T5	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
T6	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
T7	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
G10	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
G11	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
G12	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.
G13	Yew (Taxus baccata)	SS	100	14	2	2	EA	2040	C1	2	None	None	None	Retain existing tree following proposed extension. No pruning required.

**IMPACT SUMMARY**

The proposed extension will not affect the root protection areas (RPAs) of retained trees. All trees can be retained without need for pruning.

The existing hard surfacing within the car park and storage yard will remain unchanged – there is no predicted impact on retained trees.

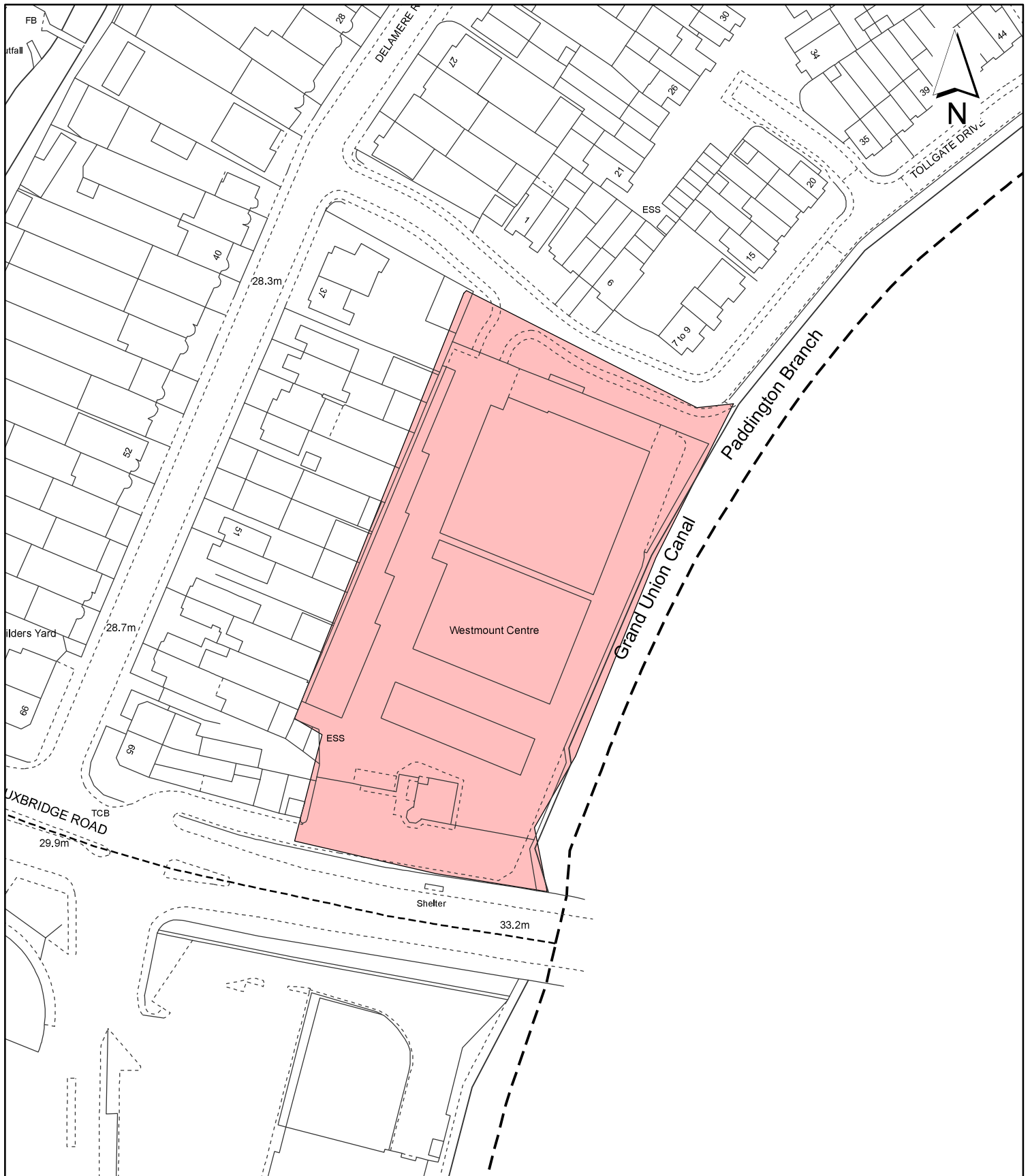
Client: ROC Hanning/Shurgard  
 Project: Shurgard, Uxbridge Road  
 Title: TREE CONSTRAINTS PLAN

Date: 03/08/22 Scale: 1:200 @ A0 (CHECK PRINTER SPEC)  
 Drawn: MW Checked: PW Client Ref:  
 Drawing Number: WLA/2107/03/TP  
 Rev: A



Please check all dimensions on site. Do not rely on monochrome copies. This drawing is the copyright of Wright Landscape and Arboriculture Ltd. and is intended for the sole use of the client. This drawing may not be changed without the written consent of Wright Landscape and Arboriculture Ltd.





**Notes:**

 Site boundary

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Site Address:

**Shurgard House**

**LONDON BOROUGH OF HILLINGDON**  
 Residents Services  
 Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:  
**49467/APP/2022/2801**

Scale:  
**1:1,250**

Planning Committee:  
**Major Page 157**

Date:  
**February 2023**



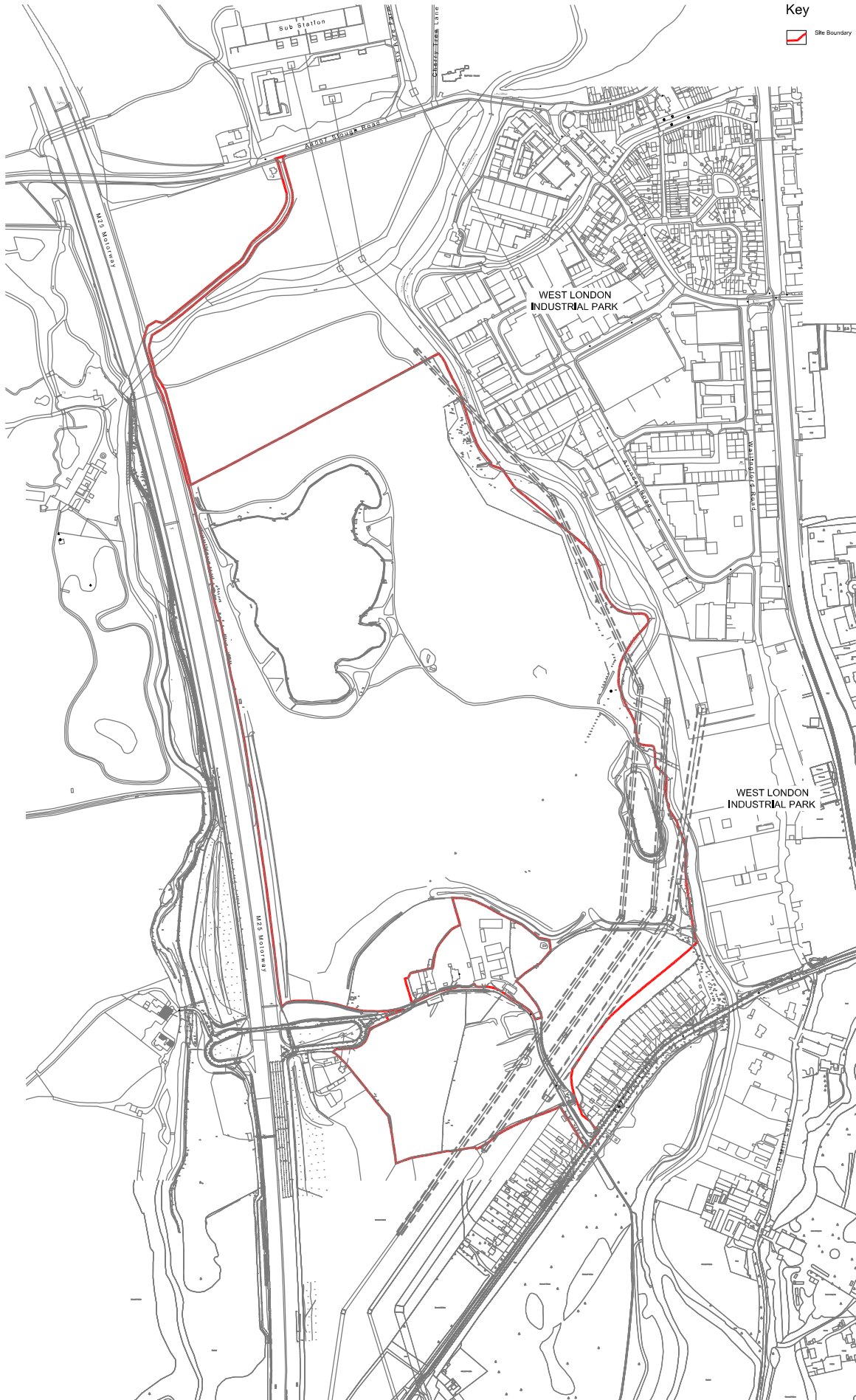
**HILLINGDON**  
 LONDON

## **Report of the Interim Director of Planning, Regeneration & Public Realm**

**Address** WOODLANDS PARK LANDFILL SITE LAND SOUTH OF SLOUGH ROAD  
IVER BUCKINGHAMSHIRE

**Development:** Out of borough consultation for Buckinghamshire County Council: Outline planning application with all matters reserved except for principal points of access for the redevelopment of the former landfill site to comprise a data centre development (Use Class B8 (Data Centre)) of up to 163,000 sq.m (GEA) delivered across 3 buildings to include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. The scheme includes site wide landscaping and the creation of parkland, and may also include cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, District Heating Network, sustainable drainage systems, ancillary infrastructure and a substation.

**LBH Ref Nos:** 39707/APP/2022/3243



**Key**  
 Site Boundary

**Scale**  
 0 20 50 100 200

**West London Technology Park Iver**  
 Site Location Plan



**Notes**  
 1) Do not scale directly from this drawing.  
 2) This drawing is to be read in conjunction with all other relevant MHP drawings and information supplied by other consultants.

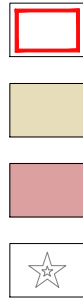
Client	West London Technology Park
Site	Greystoke Lane
Project	Site Location Plan
Drawing No.	21091_501
Scale	B
FOR INFORMATION	
DB	BD 140921 1:2000



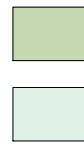
Scale



Key



The Site  
Data Centre (B8 Use)  
Sub Station  
Potential Location of Gatehouse



Landscape and Infrastructure  
Existing Water Bodies



Notes

- 1) Do not scale directly from this drawing.
- 2) This drawing is to be read in conjunction with all other relevant MHP drawings and information supplied by other consultants.

1	Final boundary updated to show clear	21/07/21	PSH
2	Original revised layout plan	21/07/21	DAL
3	Final revised layout plan	21/07/21	DAL
4	Final revised layout plan	21/07/21	DAL
5	Final revised layout plan	21/07/21	DAL
6	Final revised layout plan	21/07/21	DAL
7	Final revised layout plan	21/07/21	DAL
8	Final revised layout plan	21/07/21	DAL
9	Final revised layout plan	21/07/21	DAL
10	Final revised layout plan	21/07/21	DAL

Project:	West London Technology Park		
Site:	Greystoke Land		
Type:	Land Use Parameters Plans		
Drawing number:	21091,301	Rev:	F
Status:	FOR INFORMATION		
Drawn By:	Checked By:	Date:	Scale: A1
DAL		21-07-21	1:2500






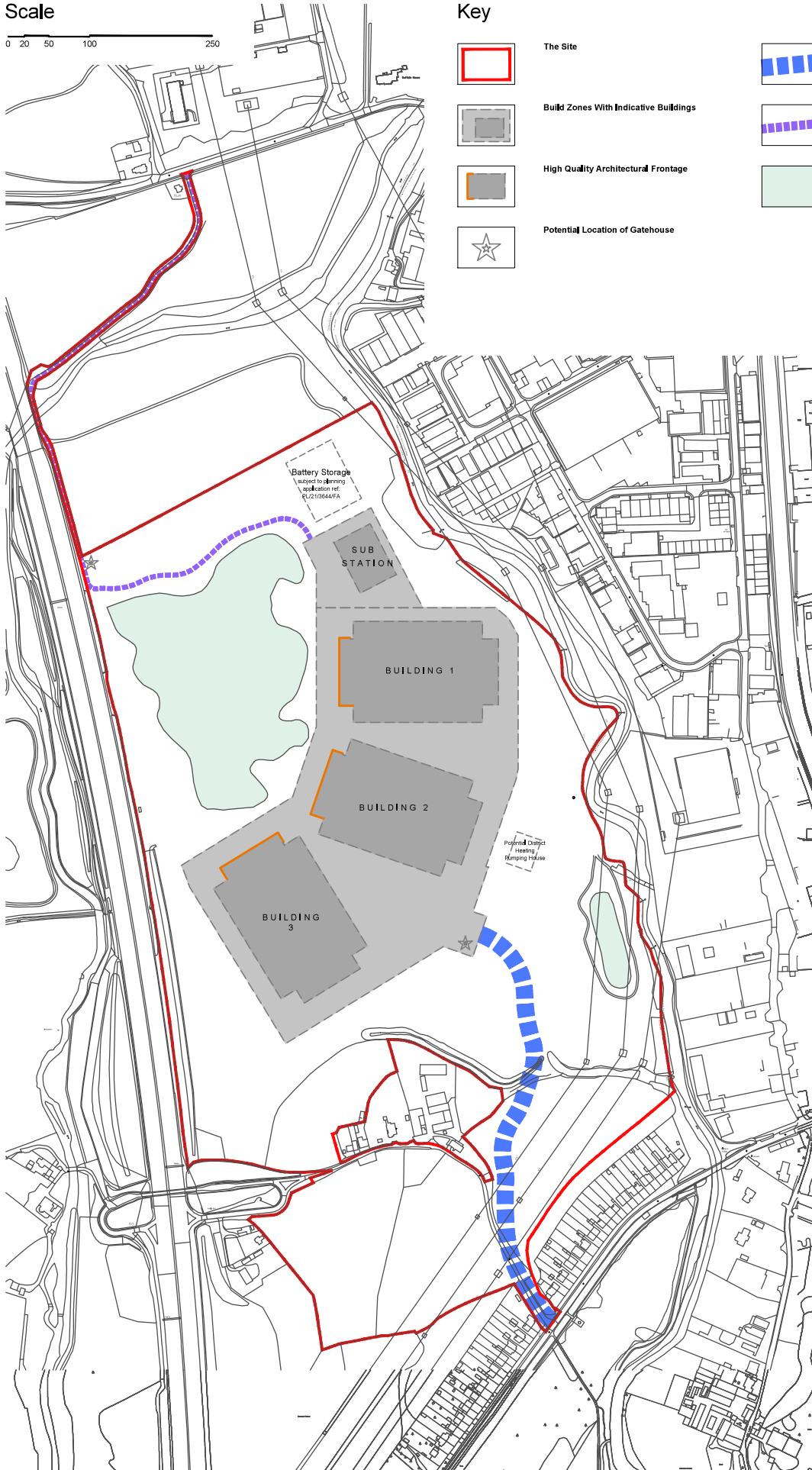
Scale



Key

-  The Site
-  Build Zones With Indicative Buildings
-  High Quality Architectural Frontage
-  Potential Location of Gatehouse

-  Primary Access Route  
Approximate location of proposed 7.3m width road and 3.0m width pedestrian / cycle access
-  Secondary / Emergency Access Route  
Approximate location of existing access track
-  Existing Water Bodies



Notes

- 1) Do not scale directly from this drawing.
- 2) This drawing is to be read in conjunction with all other relevant MHP drawings and information supplied by other consultants.

1	Final boundary, updated by MHP's Site Laws	12/01/21	PSH
2	Revised to include drainage	12/01/21	PSH
3	Added to include drainage	12/01/21	PSH
4	Added to include drainage	12/01/21	PSH
5	Added to include drainage	12/01/21	PSH
6	Added to include drainage	12/01/21	PSH
7	Added to include drainage	12/01/21	PSH
8	Added to include drainage	12/01/21	PSH
9	Added to include drainage	12/01/21	PSH
10	Added to include drainage	12/01/21	PSH

Project:	West London Technology Park		
Client:	Greystoke Land		
Title:	Development Zones Parameters Plans		
Drawing number:	21091,302	Rev:	F
Status:	FOR INFORMATION		
Drawn By:	Checked By:	Date:	Scale: A1
DAL		21-07-21	1:2500

West London Technology Park Iver  
Development Zones - Parameters Plan  
Page 161



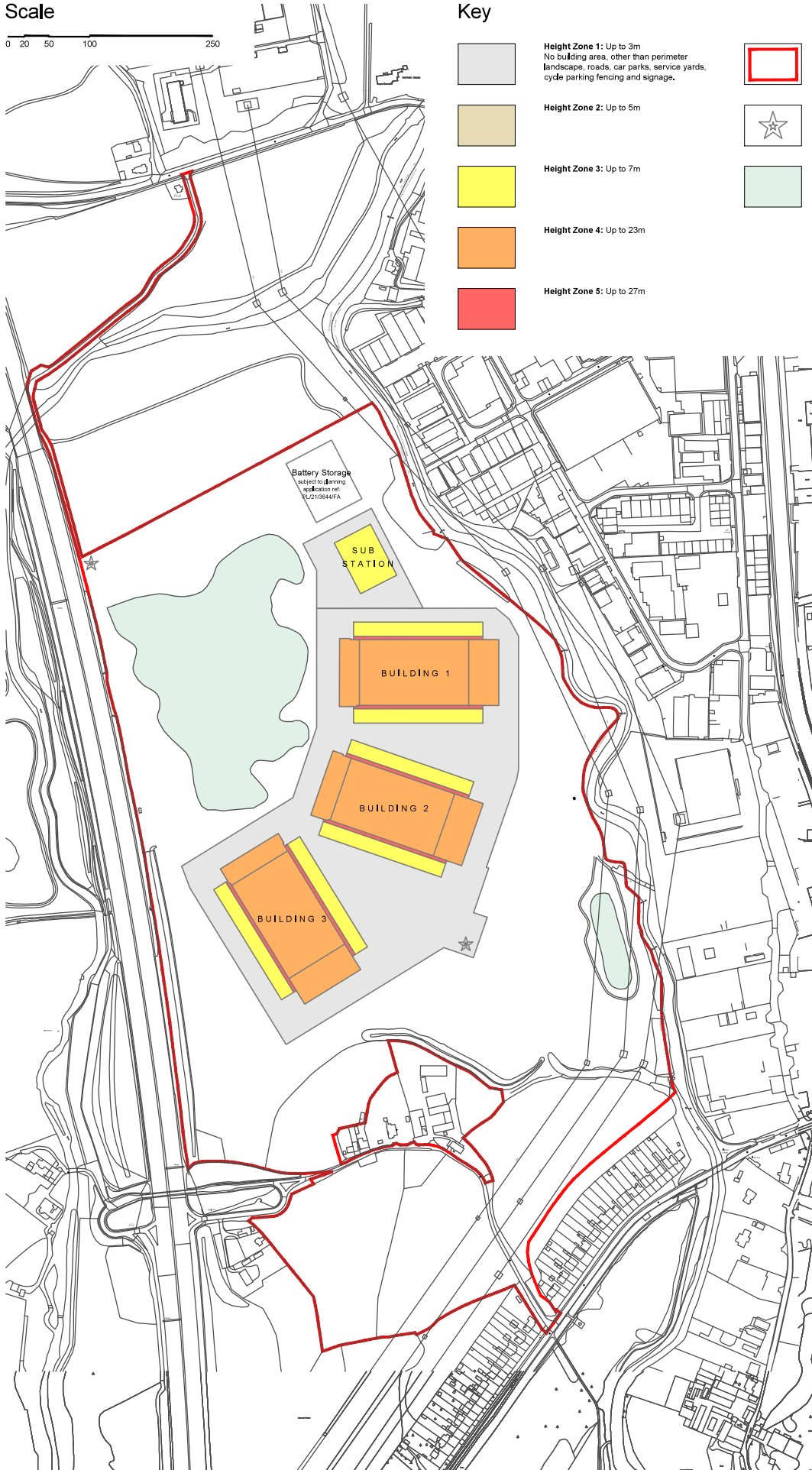


Scale



Key

	<b>Height Zone 1:</b> Up to 3m No building area, other than perimeter landscape, roads, car parks, service yards, cycle parking fencing and signage.		<b>The Site</b>
	<b>Height Zone 2:</b> Up to 5m		<b>Potential Location of Gatehouse</b>
	<b>Height Zone 3:</b> Up to 7m		<b>Existing Water Bodies</b>
	<b>Height Zone 4:</b> Up to 23m		
	<b>Height Zone 5:</b> Up to 27m		



Notes

- 1) Do not scale directly from this drawing.
- 2) This drawing is to be read in conjunction with all other relevant MHP drawings and information supplied by other consultants.

C	Buildings boundary updated by @Brenton Lane	14/01/21	DAL	CPH
D	Colors for Height Zones updated	14/01/21	DAL	
E	Final updates, layout updated	14/01/21	DAL	
F	Client approved final plan, reviewed on separate sheet	14/01/21	DAL	
A	Client approved	14/01/21	DAL	
Rev:				

Project: West London Technology Park

Site: Greystoke Land

Title: Building Heights Parameters Plans

Drawing number: 21091,303 Rev: E

Status: FOR INFORMATION

Drawn By: DAL Checked By:  Date: 21-07-21 Scale: A1 1:2500

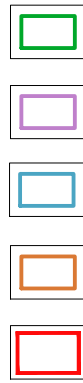
West London Technology Park Iver  
Building Heights - Parameters Plan  
Page 163



Scale



Key



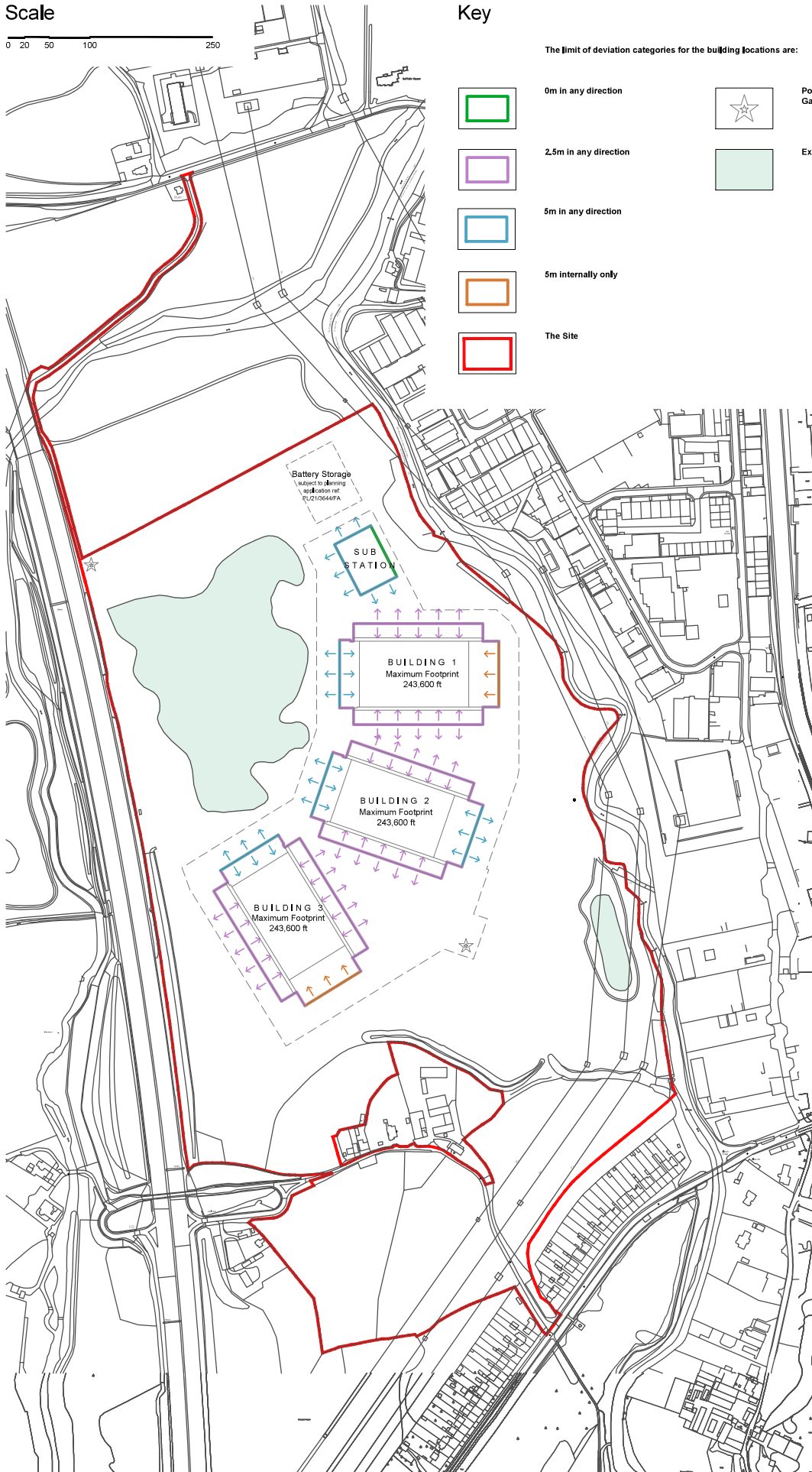
The limit of deviation categories for the building locations are:



Potential Location of Gatehouse



Existing Water Bodies



Notes

- 1) Do not scale directly from this drawing.
- 2) This drawing is to be read in conjunction with all other relevant MHP drawings and information supplied by other consultants.

F	Revised deviation to active boundaries on Building 1-3	01/01/2021	PPH
E	Revised deviation to active boundaries on Building 1-3	01/01/2021	PPH
D	Update active boundaries on Building 1-3	01/01/2021	PPH
C	Final revised plans completed	01/01/2021	PPH
B	Final revised plans completed	01/01/2021	PPH
A	Battery storage location defined on separate location plan	01/01/2021	PPH

Revisions: 

Rev	Date	Author

Project: **West London Technology Park**

Site: **Greystoke Land**

Title: **Building Lines Parameters Plans**

Drawing number: **21091.304** Rev: **F**

Status: **FOR INFORMATION**














Drawn By: **DAL** Checked By: **DAL** Date: **10-08-21** Scale: **6 AT 1:2500**



Scale



Key

-  **The Site**
-  **Building Zone Area**  
To include perimeter amenity landscape, roads, car parks, service yards, cycle parking, fencing, signage and associated infrastructure.
-  **Green Wall and Green / Brown Roof Opportunities**
-  **Informal Green Space**  
To include site access and infrastructure, access to river corridor and bridge, foot and cycle paths, to achieve bio-diversity net gain.
-  **Existing Vegetation Retained**  
To include scrub, field hedges and trees retained
-  **Existing Vegetation Removed**  
To include scrub, field hedges and trees retained
-  **Proposed Buffer Planting**
-  **Existing Water Bodies**
-  **Proposed Attenuation / Wetland Ponds**
-  **Wetland Meadow Grassland**
-  **Hay Meadow Grassland**
-  **Ecological Benefits**  
Tern islands and apiaries
-  **Potential Location of Gatehouse**

Please see accompany Development Specification and Design and Access Statement for more details



Notes

- 1) Do not scale directly from this drawing.
- 2) This drawing is to be read in conjunction with all other relevant MHP drawings and information supplied by other consultants.

<ul style="list-style-type: none"> <li>C: Initial boundary updated by [Name] [Date]</li> <li>D: [Name] [Date]</li> <li>E: [Name] [Date]</li> <li>F: [Name] [Date]</li> <li>G: [Name] [Date]</li> <li>H: [Name] [Date]</li> </ul>	<ul style="list-style-type: none"> <li>1: [Name] [Date]</li> <li>2: [Name] [Date]</li> <li>3: [Name] [Date]</li> <li>4: [Name] [Date]</li> <li>5: [Name] [Date]</li> <li>6: [Name] [Date]</li> </ul>
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Project: West London Technology Park	
Site: Greystoke Land	
Title: Indicative Green Infrastructure Parameters Plans	
Drawing number: 21091,305	Rev: E
Status: FOR INFORMATION	
Drawn By: DAL	Checked By: [Name] Date: 21-07-21 Scale: @ A1 1:2500

West London Technology Park Iver  
Indicative Green Infrastructure - Parameters Plan  
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