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

Address HILLINGDON HOSPITAL PIELD HEATH ROAD HILLINGDON

Development: 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 residentia (Class C3) and supporting Commercial, Business and Service uses (Class E), new pedestrian and vehicular access; public realm, amenity space, car and cycling parking.

Details: Comprising a maximum height of 8 storeys, 79,594sqm of Hospital Building (GIA) plus 23,034sqm of Multi-Storey Car Park, 327 residential units and 800sqm of commercial floorspace.

LBH Ref Nos: 4058/APP/2022/1788

Drawing Nos: Residential Travel Plan Framework THHR_01-MMD-XX-XX-RP-U-2001 Re C01
Sustainable Waste Management Plan THHR_01-ACM-WS-XX-RP-Y 000027 Rev P01
Whole Life-Cycle Carbon Assessment THHR_01-ACM-ZZ-XX-RP-Y-00002(Rev 01
Archaeological Desk-Based Assessment Rev 001 April 2022
BREEAM Pre-assessment Report THHR_01-RGD-XX-XX-RP-SS-0004 Rev P02
BREEAM Pre-Demolition Audit Report THHR_01-ACM-WS-XX-RP-Y 000028 Rev P01
Basement Impact Assessment THHR_01-ACM-XX-XX-RP-Y-9002 Rev P0:
Biodiversity Net Gain Report THHR_01-ACM-ZZ-XX-RP-Y-000015 Rev P(
Car Park Management Plan THHR_01-MMD-WS-ZZ-RP-U-4000 Rev C0
Circular Economy Statement THHR_01-ACM-ZZ-XX-RP-Y-000021 Rev 0
THHR_01-MMD-XX-XX-DR-U-1002 Rev C01 Access Arrangement Phase - Service/Ambulance Yards and A&E Drop Off
THHR_02-IBI-WB-02-DR-A-200003 Rev P05 MSCP - Level
THHR_01-MMD-XX-XX-DR-U-1001 Rev C01 Access Arrangement Phase - Main Access Pield Heath Road/Royal Lane
THHR_01-MMD-XX-XX-DR-U-2203 Rev C01 Phase 2 Land Reserved fc Junction Improvement Pield Heath Road/Colham Green Road
THHR_01-IBI-WS-06-DR-L-700022 Rev P03 Level 03 Terrace Externa Works Typical Section
THHR_01-MMD-XX-XX-DR-U-2105 Rev C01 Access Arrangement Phase
THHR_02-IBI-XX-ZZ-DR-A-251001 Rev P03 East & West Elevation (MSCP)
THHR_02-IBI-XX-ZZ-DR-A-251002 Rev P03 North and South Elevatior

THHR_01-IBI-XX-ZZ-DR-A-251101 Rev P05 East Elevatio
THHR_01-IBI-WS-XX-DR-A-100003 Rev P08 Site Plan as Propose
THHR_01-IBI-WS-XX-DR-A-100002 Rev P21 Site Plan as Proposed witl
Existing Hospital Present
THHR_01-PRP-WS-ZZ-DR-A-200016 Rev P04 Proposed Open Space
THHR_01-PRP-WS-ZZ-DR-A-200013 Rev P04 Proposed Site Levels
THHR_01-IBI-WS-00-DR-A-251325 Rev P01 Existing Hospital Plans - Adu
Audiology
THHR_01-IBI-WS-00-DR-A-251301 Rev P01 Existing Hospital Plans
Alderbourne
THHR_01-IBI-WS-00-DR-A-251303 Rev P01 Existing Hospital Plans
Beaconsfield
THHR_01-IBI-WS-00-DR-A-251319 Rev P01 Existing Hospital Plans
Bevan Ward
THHR_01-IBI-WS-00-DR-A-251323 Rev P01 Existing Hospital Plans - Busy
Bees Nursery
THHR_01-IBI-WS-ZZ-DR-A-251304 Rev P01 Existing Hospital Plans
Churchill, Osterley, Pinewood and Quebec Ward
THHR_01-IBI-WS-ZZ-DR-A-251310 Rev P01 Existing Hospital Plans
Drayton, Elizabeth, Fleming and Grange Ward
THHR_01-IBI-WS-00-DR-A-251321 Rev P01 Existing Hospital Plans - Old
Creche
THHR_01-IBI-WS-ZZ-DR-A-251305 Rev P01 Existing Hospital Plans
Pagett, Diabeticare, Lister and Middlesex ward
THHR_01-IBI-WS-01-DR-A-251309 Rev P01 Existing Hospital Plans
Podium First Floor
THHR_01-IBI-WS-00-DR-A-251308 Rev P01 Existing Hospital Plans
Podium Ground Floor
THHR_01-IBI-WS-00-DR-A-251307 Rev P01 Existing Hospital Plans
Podium Lower Ground Floor and Sewage Pump Room
THHR_01-IBI-WS-ZZ-DR-A-251317 Rev P01 Existing Hospital Plans
Seacole Building
THHR_01-IBI-WS-ZZ-DR-A-251316 Rev P01 Existing Hospital Plans - The
Furze
THHR_01-IBI-WS-ZZ-DR-A-251322 Rev P01 Existing Hospital Plans
Tudor Centre
THHR_01-MMD-XX-XX-DR-U-0001 Rev C01 Existing Access Arrangemer
and Surrounding Roads
Noise and Vibration Assessment THHR_01-ACM-ZZ-XX-RP-Y-000025 Re
P04
THHR_01-IBI-XX-ZZ-DR-A-251106 Rev P04 Internal East Elevation throug
Courtyards
THHR_01-IBI-XX-ZZ-DR-A-251105 Rev P03 Internal West Elevation throug
Courtyards
THHR_01-IBI-XX-ZZ-DR-A-251104 Rev P04 North Elevatic
THHR_01-IBI-ZZ-ZZ-RP-A-251110 Rev P01 Streetscene Elevation Nort
and East
THHR_01-IBI-ZZ-ZZ-RP-A-251120 Rev P01 Streetscene Elevation Sout
and West
MGS46401-E43 Education Centre Building External Elevation 4

MGS46401-E44 Education Centre Building External Elevation 4
MGS46401-E30 Endoscopy Building External Elevation 3
MGS46401-E31 Endoscopy Building External Elevation 3
MGS46401-E32 Endoscopy Building External Elevation 3
MGS46401-E33 Endoscopy Building External Elevation 3
MGS46401-E34 Endoscopy Building External Elevation 3
MGS46401-E35 Endoscopy Building External Elevation 3
MGS46401-E36 Endoscopy Building External Elevation 3
MGS46401-E37 Endoscopy Building External Elevation 3
MGS46401-E25 Main Building External Elevation 2
MGS46401-E26 Main Building External Elevation 2
MGS46401-E27 Main Building External Elevation 2
MGS46401-E28 Main Building External Elevation 2
MGS46401-E29 Main Building External Elevation 2
MGS46401-E38 Main Building External Elevation 3
MGS46401-E39 Main Building External Elevation 3
MGS46401-E40 Main Building External Elevation 4
MGS46401-E09 New Born Building External Elevation 0
MGS46401-E10 New Born Building External Elevation 1
THHR_01-ACM-WS-XX-DR-C-772200 Rev P04 Phase 2 Indicative Drainage Strategy
THHR_01-PRP-WS-ZZ-DR-A-200017 Rev P04 Proposed Access and Circulation
THHR_01-PRP-WS-ZZ-DR-A-200015 Rev P04 Proposed Building Heights
THHR-01-IBI-WB-02-DR-L-700016 Rev P03 Level 02 - Terrace Externa Works General Arrangement Plan Typical Section
THHR-01-IBI-WB-02-DR-L-700017 Rev P03 Level 02 - Terrace Externa Works General Arrangement Plan Typical Section
THHR_01-IBI-WB-00-DR-L-700010 Rev P01 Level 00 - Typical Landscape Sections
THHR_01-IBI-WB-02-DR-L-700011 Rev P03 Level 02 Terrace Externa Works Typical Section
THHR_01-IBI-WB-04-DR-L-700013 Rev P03 Level 04 Terrace Externa Works Typical Section
THHR_01-IBI-WB-06-DR-L-700014 Rev P03 Level 06 Terrace Externa Works Typical Section
THHR_01-IBI-XX-08-DR-L-700015 Rev P03 Level 08 Terrace Externa Works Typical Section
THHR_01-IBI-XX-ZZ-DR-A-251102 Rev P04 South Elevatio
THHR_01-IBI-XX-ZZ-DR-A-251103 Rev P04 West Elevatio
THHR_02-IBI-XX-05-DR-L-700016 Rev P03 MSCP Roof External Work
THHR_01-IBI-WS-00-DR-L-700006 Rev P03 Landscape Sections at Ground Level
MGS46401-SE-C Sectional Elevation C
THHR_01-IBI-XX-XX-DR-A-100004 Rev P02 Demolition Phases 1A and 1
THHR_01-IBI-XX-XX-DR-A-100005 Rev P02 Demolition Phases 1C and
THHR_01-PRP-WS-ZZ-DR-A-200014 Rev P05 Proposed Plots Deviations (Parameter Plan)
THHR_01-IBI-WS-XX-DR-A-100001 Rev P05 Site Location Pla
THHR_01-IBI-XX-XX-DR-A-100006 Rev P01 Application Boundaries Pla

THHR_01-IBI-WS-XX-DR-A-100008 Rev P01 Block Plai
THHR_01-PRP-WS-ZZ-DR-A-200018 Rev P04 Proposed Land Uses
THHR_01-IBI-ZZ-ZZ-RP-A-250010 Rev P04 Design and Access Statemer
THHR_01-PRP-WS-ZZ-DR-A-200012 Rev P04 Existing Site Levels -
Outline Planning Application (Phase 2)
THHR_01-PRP-WS-ZZ-DR-A-200011 Rev P04 Existing Site Plan - Outline
Planning Application (Phase 2)
THHR_01-PRP-WS-ZZ-DR-A-200019 Rev P04 Illustrative Masterplai
THHR_01-IBI-WS-XX-DR-A-100009 Rev P01 Phase 1A and 1B of Detaile
application
THHR_01-IBI-WS-XX-DR-A-100010 Rev P01 Phase 1C of Detailed
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THHR_01-MMD-XX-XX-DR-U-2104 Rev C01 Access Arrangement Phase 1
Tracking Sheet 5
THHR_01-MMD-XX-XX-DR-U-1100 Rev C01 Access Arrangement Phase
Tracking Sheet 1
THHR_01-MMD-XX-XX-DR-U-1101 Rev C01 Access Arrangement Phase
Tracking Sheet 2
THHR_01-MMD-XX-XX-DR-U-1102 Rev C01 Access Arrangement Phase
Tracking Sheet 3
THHR_01-MMD-XX-XX-DR-U-1103 Rev C01 Access Arrangement Phase
Tracking Sheet 4
THHR_01-MMD-XX-XX-DR-U-1104 Rev C01 Access Arrangement Phase
Tracking Sheet 5
THHR_01-MMD-XX-XX-DR-U-1106 Rev C01 Access Arrangement Phase
Tracking Sheet 7
Outline Construction Logistics Plan THHR_01-MMD-XX-XX-RP-U-6000 Re
C01
Daylight and Sunlight Report REL9-DRAFT2
Demolition and Construction Management Plan May 2022 Rev V1
Outline Business Case Quality and Equality Impact Assessment V 1.2
March 2022
External Lighting Report THHR_01-ACM-ZZ-XX-RP-E-125002 Rev P0
Fire Statement THHR_01-TEN-ZZ-ZZ-RP-FE-000002 Rev P0
Rapid Health Impact Assessment May 2022
Heritage, Townscape and Visual Impact and Tall Building Assessment Apr
2022
Hospital Travel Plan Framework THHR_01-MMD-WB-ZZ-RP-U-2000 Re
C01
Wind Microclimate Study THHR_01-ACM-ZZ-XX-RP-Y-000022 Rev P0
THHR_01-IBI-WS-ZZ-DR-A-251318 Rev P01 Existing Hospital Plans
Education Centre
THHR_01-IBI-WS-00-DR-A-251302 Rev P01 Existing Hospital Plans
Elderly Day Care
THHR_01-IBI-WS-00-DR-A-251324 Rev P01 Existing Hospital Plans
Energy Centre
THHR_01-IBI-WS-00-DR-A-251320 Rev P01 Existing Hospital Plans
Greenacres
THHR_01-IBI-WS-ZZ-DR-A-251311 Rev P01 Existing Hospital Plans
Hayes, Jersey and Kennedy Ward

THHR_01-IBI-WS-00-DR-A-251312 Rev P01 Existing Hospital Plans Maternity Ground Floor
THHR_01-IBI-WS-01-DR-A-251313 Rev P01 Existing Hospital Plans Maternity First Floor
THHR_01-IBI-WS-02-DR-A-251314 Rev P01 Existing Hospital Plans Maternity Second Floor
THHR_01-IBI-WS-03-DR-A-251315 Rev P01 Existing Hospital Plans Maternity Third Floor
THHR_01-IBI-WS-ZZ-DR-A-251306 Rev P01 Existing Hospital Plans Nightingale Centre (AMU)
MGS46401-E01 New Born Building External Elevation 0
MGS46401-E02 New Born Building External Elevation 0
MGS46401-E03 New Born Building External Elevation 0
MGS46401-E New Born Building External Elevation 0
MGS46401-E05 New Born Building External Elevation 0
MGS46401-E06 New Born Building External Elevation 0
MGS46401-E07 New Born Building External Elevation 0
MGS46401-E08 New Born Building External Elevation 0
MGS46401-E41 Education Centre Building External Elevation 4
MGS46401-E42 Education Centre Building External Elevation 4
THHR_01-MMD-XX-XX-DR-U-2202 Rev C01 Access Arrangement Phase 2 General Arrangement Tracking
THHR_01-MMD-XX-XX-DR-U-1105 Rev C01 Access Arrangement Phase Tracking Sheet 6
THHR_01-MMD-XX-XX-DR-U-2000 Rev C01 Access Arrangement Phase 2 General Arrangement
THHR_01-MMD-XX-XX-DR-U-2201 Rev C01 Access Arrangement Phase 2 General Arrangement
THHR_01-MMD-XX-XX-DR-U-2001 Rev C01 Access Arrangement Phase 2 - Main Access Pield Heath Road/Royal Lane
THHR_01-MMD-XX-XX-DR-U-2002 Rev C01 Access Arrangement Phase 2 - Service/Ambulance Yards and A&E Drop Off
THHR_01-MMD-XX-XX-DR-U-2100 Rev C01 Access Arrangement Phase 2 Tracking Sheet 1
THHR_01-MMD-XX-XX-DR-U-2101 Rev C01 Access Arrangement Phase 2 Tracking Sheet 2
THHR_01-MMD-XX-XX-DR-U-2102 Rev C01 Access Arrangement Phase 2 Tracking Sheet 3
THHR_01-MMD-XX-XX-DR-U-2103 Rev C01 Access Arrangement Phase 2 Tracking Sheet 4
THHR_01-IBI-WS-XX-DR-L-700000 Rev P05 Landscape Genera Arrangement Plan
THHR_01-IBI-WB-B1-DR-A-251009 Rev P09 Basement - Departmen Adjacency Plan
THHR_01-IBI-WB-00-DR-A-251000 Rev P11 Level 00 - Departmen Adjacency Plan
THHR_01-IBI-WB-01-DR-A-251001 Rev P10 Level 01 - Departmen Adjacency Plan
THHR_01-IBI-WB-02-DR-A-251002 Rev P10 Level 02 - Departmen Adjacency Plan

THHR_01-IBI-WB-03-DR-A-251003 Rev P10 Level 03 - Departmen
Adjacency Plan
THHR_01-IBI-WB-04-DR-A-251004 Rev P09 Level 04 - Departmen
Adjacency Plan
THHR_01-IBI-WB-05-DR-A-251005 Rev P09 Level 05 - Departmen
Adjacency Plan
THHR_01-IBI-WB-06-DR-A-251006 Rev P09 Level 06 - Departmen
Adjacency Plan
THHR_01-IBI-WB-07-DR-A-251007 Rev P10 Level 07 - Departmen
Adjacency Plan
THHR_01-IBI-WB-08-DR-A-251008 Rev P05 Level 08 - Departmen
Adjacency Plan
THHR_01-PRP-WS-ZZ-DR-A-200020 Rev P04 Phasing Plar
THHR_01-IBI-WS-XX-DR-A-100007 Rev P01 Site Phasing Pla
THHR_01-IBI-WS-XX-DR-L-700001 Rev P03 Landscape Genera
Arrangement Plan
THHR_01-IBI-WS-XX-DR-L-700002 Rev P05 Landscape Genera
Arrangement Plan
THHR_01-IBI-WS-XX-DR-L-700003 Rev P04 Landscape Genera
Arrangement Plan
THHR_01-IBI-WS-XX-DR-L-700005 Rev P05 Landscape Genera
Arrangement Plan
THHR_01-IBI-WS-XX-DR-L-700006 Rev P03 Landscape Genera
Arrangement Plan
THHR_01-IBI-WS-XX-DR-L-700007 Rev P02 Landscape Genera
Arrangement Plan
THHR_02-IBI-WB-00-DR-A-200000 Rev P06 MSCP - Level (
THHR_02-IBI-WB-00-DR-A-200001 Rev P05 MSCP - Level
THHR_02-IBI-WB-02-DR-A-200002 Rev P05 MSCP - Level 2
THHR_02-IBI-WB-02-DR-A-200004 Rev P05 MSCP - Level 4
THHR_02-IBI-WB-02-DR-A-200005 Rev P04 MSCP - Level 5
THHR_01-IBI-WS-XX-DR-L-700004 Rev P04 Landscape Genera
Arrangement Plan
THHR_01-IBI-WS-XX-DR-L-700008 Rev P02 Planting Strategy Pla
THHR_01-IBI-WS-XX-DR-L-700009 Rev P02 Landscape Typical Details
THHR_01-IBI-WB-00-DR-L-700010 Rev P02 Level 00 - Terrace Externa
Works
THHR_01-IBI-WB-02-DR-L-700011 Rev P02 Level 02 - Terrace Externa
Works
THHR_01-IBI-XX-02-DR-L-700011 Rev P02 Level 02 - Terrace Externa
Works
THHR_01-IBI-XX-03-DR-L-700012 Rev P02 Level 03 - Terrace Externa
Works
THHR_01-MMD-XX-XX-DR-U-2003 Rev C01 Access Arrangement Phase 2
Service Access/Colham Green Road
THHR_01-MMD-XX-XX-DR-U-1000 Rev C01 Access Arrangement Phase
General Arrangement
THHR_01-MMD-XX-XX-DR-U-1003 Rev C01 Access Arrangement Phase
Service Access/Colham Green Road
Transport Assessment THHR_01-MMD-XX-XX-RP-U-1000 Rev C0

Tree Constraints Report HFT/THH/TCR/01 5th Feb 2021
Air Quality Assessment THHR_01-ACM-ZZ-XX-RP-Y-000005 Rev
Energy Strategy THHR_01-ACM-ZZ-XX-RP-Y-000019 Rev 0
Ecological Impact Assessment THHR_01-ACM-ZZ-XX-RP-Y-000018 Rev
V3
Level 2 Flood Risk Assessment THHR_01_ACM_ZZ_XX_RP_Y_00002
Rev D03
Geotechnical and Geo-environmental Assessment of Phase 1 Ground
Investigations THHR_01-ACM-XX-XX-RP-Y-9001 Rev P02
Proposed Drainage Strategy THHR_01-ACM-WS-XX-RP-C-772000 Rev
P05
Arboricultural Impact Assessment HFT/THH/AIA/02c 19th May 202
Cover Letter 8th June 2022
MGS46401-E11 New Born Building External Elevation 1
MGS46401-E12 New Born Building External Elevation 1
MGS46401-E13 New Born Building External Elevation 1
MGS46401-E14 New Born Building External Elevation 1
MGS46401-SE-A1 Sectional Elevation A Part
MGS46401-SE-A2 Sectional Elevation A Part
MGS46401-SE-B Sectional Elevation E
Outline Fire Statement THHR_01-TEN-ZZ-ZZ-RP-FE-000004 Issue P0
Outline Delivery and Servicing Plan THHR_01-MMD-XX-XX-RP-U-5000 Rev
C01
Planning Statement May 2022
Socio-Economic Report May 2022
Statement of Community Involvement March 2022
Utilities Survey Report THHR_01-ACM-ZZ-XX-RP-BS-125003 Rev P0
Heritage, Townscape and Visual Impact and Tall Building Assessment
Addendum Note August 2022
The Hillingdon Hospital Redevelopment Electricity Supply
Mobility Hub Vision Paper THHR_02-MMD-WB-ZZ-RP-U-2002 Rev C0
Indicative Planting Palette THHR_01-IBI-WB-XX-RP-L-000001 Rev P0
MGS46401-E15 Main Building External Elevation 1
MGS46401-E16 Main Building External Elevation 1
MGS46401-E17 Main Building External Elevation 1
MGS46401-E18 Main Building External Elevation 1
MGS46401-E19 Main Building External Elevation 1
MGS46401-E20 Main Building External Elevation 2
MGS46401-E21 Main Building External Elevation 2
MGS46401-E22 Main Building External Elevation 2
MGS46401-E23 Main Building External Elevation 2
MGS46401-E24 Main Building External Elevation 2

Date Plans Received:	06/06/2022	**Date(s) of Amendment(s):**	17/11/2022 09/06/2022 29/09/2022
Date Application Valid:	14/06/2022		

1. SUMMARY

This is a hybrid planning application for the redevelopment of the Hillingdon Hospital site. Full planning consent is sought for Phase 1, which is the demolition of existing buildings in

the western part of the site (excluding the Tudor Centre and the Old Creche) and redevelopment 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, public open space, utilities, servicing area, surface car park/expansion space and other works incidental to the proposed development. The new Hospital building would have a maximum height of 8 storeys and a gross internal floor area of 79,594sqm. The proposed Multi-Storey Car Park would have an internal area of 23,034sqm and would provide 942 car parking spaces and 336 long-stay and 56 short-stay cycle parking spaces.

Outline planning consent, with all matters reserved except for access, is also applied for Phase 2, which is the demolition of buildings and structures on the remaining area of the site (excluding the Grade II Listed Furze) for a mixed-use development comprising up to 327 residential units (Use Class C3) and 800sqm of supporting Commercial, Business and Service uses (Class E), new pedestrian and vehicular access; public realm, amenity space plus car and cycling parking.

The two-phase approach proposed within the application is considered to be acceptable. There is a requirement to provide continuous care on the site and therefore to build a new Hospital whilst maintaining the current buildings and services. The application therefore proposes that a new Hospital building and supporting multi storey car park (MSCP) be constructed to the west of the wider hospital site, with the majority of this area currently being surface level car parking. If granted planning consent, then once the new Hospital building and MSCP have been constructed, the existing hospital buildings would be demolished, and public open space and residential buildings brought forward.

The existing hospital site has been developed on an adhoc and piecemeal basis since the 1940s rather than being planned based on the needs of the hospital at different times. The submission includes details of the existing buildings on the site, with most of the buildings (81%) now classed as either in a 'poor' or 'bad' state and that the continual upkeep of the buildings is a huge ongoing cost that is impacting on the quality of care that can be given to patients.

The Trust have outlined that at the heart of the proposals, is a shared vision of providing improved access to better healthcare services in a new fit for purpose hospital on the Hillingdon Hospital site. The Trust, working with partners across the community, seek to improve care and help avoid unnecessary hospital stays.

The Trust plan to provide the same range of services that are currently available at the hospital, but in a high quality, purpose-built facility. In designing the new facility, the Trust seek to work with its partners across the health and social care system to improve the integration of care across the borough and beyond. There is undoubtedly a need for a new hospital in Hillingdon, given that the life of the Hillingdon Hospital estate has largely expired. The optimisation of the existing hospital site through the construction of a new hospital on the western extent of the site would allow the rest of the site to be cleared for other land uses such as residential in line with local, regional and national planning policies.

The applicant sets out the key benefits of the new Hillingdon Hospital to be:
- A more attractive environment for staff and patients, improving their experience
- Full compliance with the latest safety standards
- Better connectivity between departments making it easier for patients to move through the hospital
- Greater adoption of digital technologies to enhance patient care and safety
- Improved privacy with significantly more side rooms

- A more energy efficient building
- Inclusion of areas to benefit the wider community, including public open spaces
- Flexibility to adapt facilities in response to potential future pandemics
- Support the integration of care and wellbeing across North West London and support the wider local economy through the creation of local jobs.

It is recognised that the proposed development may have a detrimental impact on the outlook of adjacent residential occupiers to the south of the site, and therefore represents a minor conflict with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). However, overall whilst the detrimental impact on properties along the western and southern boundaries of the site is regrettable and has been mitigated as far as possible within the constraints of the development, the detrimental impact is considered to be acceptable when the broader benefits of the development in terms of healthcare provision are taken into account.

The principle of a new hospital building and additional residential units is widely supported by the LPA, the GLA and strategic partners. Therefore, subject to a s106 legal agreement to secure the obligations to mitigate the impact of the proposals and the planning conditions required as set out within this report, it is recommended that the application be approved.

2. RECOMMENDATION

That delegated powers be given to the Interim 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:

Phase 1

1. Hospital Expansion Area Protection for future hospital expansion only;

2. Temporary visitor and Staff Parking Scheme;

3. Hospital Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such as matters as: 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;

4. Financial contribution of £6,000 towards Santander (or equivalent) Cycle Hire Scheme;

5. Wayfinding Contribution of £29,000;

6. Provision on site of 4 car club spaces;

7. Bus Stop Infrastructure, including Section 278 works to the public highway and a contribution of up to £250,000 for works within private land;

8. Financial contribution of £4,553,445 towards a Carbon Offset Fund at £90/tonne

and/or a revised energy strategy delivering more on-site carbon saving OR an equivalent scheme for another NHS site in the borough/directly adjoining borough;

9. Financial contribution of £19,985 towards mitigating the impact of the development on air quality;

10. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances;

11. Public Open Space to remain unrestricted in perpetuity;

12. Maintain an operational hospital at all times within the application site boundary;

Phase 2

13. On-site Affordable Housing of 54% (by hab room) with a Tenure split of 70% intermediate and 30% affordable rent. This shall include an Early Stage Viability Review mechanism as defined by Policy H5 of the London Plan (2021);

14. Residential Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such as matters as: 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;

15. Financial contribution of £12,000 towards Santander (or equivalent) Cycle Hire Scheme;

16. Wayfinding Contribution £18,500;

17. Carbon Offset contribution. In the event that the reserved matter applications are not net zero a carbon offset payments shall be paid to the Council's carbon offset fund;

18. Air Quality Contribution: Subject to the submission of an updated AQA alongside the reserved matters application, damage costs shall be paid at reserved matters stages, as identified by the updated AQA;

19. Parking Permits: The residents of this development will not to be eligible for future parking permits within any future Parking Management Areas and Council car parks in the vicinity of the site, apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions;

20. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances;

21. Public Open Space of 4590 sqm to remain unrestricted in perpetuity;

22. London Healthy Urban Development Unit (HUDU) contribution of £578,038;

23. On site car club of 2 spaces, free membership for 3 years plus £50 credit for one person in each unit;

Phase 1 and Phase 2

24. Road Ownership/Bus Lease Arrangements - To allow access through the site for buses/grant TfL a license or lease to run bus services through the site, including:
- The agreement of the detailed specification for the roads in which buses will operate along to be agreed with the Council, in consultation with TfL
- Appropriate agreement to cover the provision and cost of works required to facilitate the provision of road infrastructure that allows for safe and efficient two-way bus movement through the site. The appropriate agreement will also include a Safety Audit for the road infrastructure in which buses will run along, with a commitment to address all concerns raised within this Audit
- Clause to restrict occupation of the Phase 2 until highway works to facilitate new bus route into the site have been implemented
- To construct the roads in which buses will operate along to adoptable standards
- Submission and agreement of an Operating and Maintenance Plan for the roads in which buses will operate along by the Council, in consultation with TfL;

25. Financial contribution of £561,625 towards improvements to the Public Realm/Active Travel Zones (sum to be divided between Phase 1 and 2);

26. Secure all necessary highway works including written agreement from the Local Planning Authority (Section 278/S38);

27. Financial contribution towards Water Infrastructure;

28. Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting 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 and any changes that may be negotiated with the GLA/TfL.

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

'The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Hospital Expansion Area Protection, Temporary Staff Parking, Hospital Travel Plan, Cycle Hire, Wayfinding, Car Club, Bus Infrastructure, Carbon Offset Contributions, Air Quality Contributions, Public Open Space, Operational Hospital, Affordable Housing, Residential Travel Plan, Parking Permits, HUDU Contribution, Road Ownership/Bus Lease Arrangements, Public Realm/ATZ Improvements, Cycle Route Improvements, Highway Works s278/s38, Water Infrastructure, Employment Strategy and Construction Training, and Project Management & Monitoring Fee). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); the adopted Planning Obligations Supplementary Planning Document (July 2014); Policy DF1 of the London Plan (March 2021); and paragraphs 54-57 of the National Planning Policy Framework (July 2021).'

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

1 COM1 **Time Limit - Phase 1 Condition**

PHASE 1 CONDITION

The development hereby permitted within Phase 1 shall begin 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 (As Amended).

2 COM2 **Outline Reserved Matters - Phase 2 Condition**

PHASE 2 CONDITION

The outline element of the development hereby approved shall begin either before the expiration of seven years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Applications for approval of the following reserved matters shall be made to the Local Planning Authority before the expiry of seven years from the date of this permission:

(a) Appearance

(b) Means of Access

(c) Landscaping

(d) Layout

(e) Scale

The implementation of each phase of this permission must be begun not later than the expiration of two years from the final approval of the reserved matters for that phase.

REASON
To comply with Section 92 of the Town and Country Planning Act 1990 (As Amended).

3 COM4 Accordance with Approved Plans - Joint Condition

JOINT CONDITION

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

In relation to the outline element:

THHR_01-PRP-WS-ZZ-DR-A-200013 Rev P04 Proposed Site Levels
THHR_01-PRP-WS-ZZ-DR-A-200014 Rev P05 Proposed Plots Deviations (Parameter Plan)
THHR_01-PRP-WS-ZZ-DR-A-200015 Rev P04 Proposed Building Heights
THHR_01-PRP-WS-ZZ-DR-A-200016 Rev P04 Proposed Open Space
THHR_01-PRP-WS-ZZ-DR-A-200017 Rev P04 Proposed Access and Circulation
THHR_01-PRP-WS-ZZ-DR-A-200018 Rev P04 Proposed Land Uses
THHR_01-PRP-WS-ZZ-DR-A-200020 Rev P04 Phasing Plan

In relation to the detailed Phase 1 proposals:

THHR_01-IBI-WS-XX-DR-A-100001 Rev P05 Site Location Plan
THHR_01-IBI-XX-XX-DR-A-100006 Rev P01 Application Boundaries Plan
THHR_01-IBI-WS-XX-DR-A-100008 Rev P01 Block Plan
THHR_01-IBI-XX-XX-DR-A-100004 Rev P02 Demolition Phases 1A and 1B
THHR_01-IBI-XX-XX-DR-A-100005 Rev P02 Demolition Phases 1C and 2
THHR_01-PRP-WS-ZZ-DR-A-200019 Rev P04 Illustrative Masterplan
THHR_01-IBI-WS-XX-DR-A-100009 Rev P01 Phase 1A and 1B of Detailed application
THHR_01-IBI-WS-XX-DR-A-100010 Rev P01 Phase 1C of Detailed Application - 228
THHR_01-IBI-WS-XX-DR-A-100003 Rev P08 Site Plan as Proposed
THHR_01-IBI-WS-XX-DR-A-100002 Rev P21 Site Plan as Proposed with Existing Hospital Present
THHR_01-IBI-WB-B1-DR-A-251009 Rev P09 Basement - Department Adjacency Plan
THHR_01-IBI-WB-00-DR-A-251000 Rev P11 Level 00 - Department Adjacency Plan
THHR_01-IBI-WB-01-DR-A-251001 Rev P10 Level 01 - Department Adjacency Plan
THHR_01-IBI-WB-02-DR-A-251002 Rev P10 Level 02 - Department Adjacency Plan
THHR_01-IBI-WB-03-DR-A-251003 Rev P10 Level 03 - Department Adjacency Plan
THHR_01-IBI-WB-04-DR-A-251004 Rev P09 Level 04 - Department Adjacency Plan
THHR_01-IBI-WB-05-DR-A-251005 Rev P09 Level 05 - Department Adjacency Plan
THHR_01-IBI-WB-06-DR-A-251006 Rev P09 Level 06 - Department Adjacency Plan
THHR_01-IBI-WB-07-DR-A-251007 Rev P10 Level 07 - Department Adjacency Plan
THHR_01-IBI-WB-08-DR-A-251008 Rev P05 Level 08 - Department Adjacency Plan
THHR_01-IBI-WS-XX-DR-A-100007 Rev P01 Site Phasing Plan
THHR_02-IBI-WB-00-DR-A-200000 Rev P06 MSCP - Level 0
THHR_02-IBI-WB-00-DR-A-200001 Rev P05 MSCP - Level 1

THHR_02-IBI-WB-02-DR-A-200002 Rev P05 MSCP - Level 2
THHR_02-IBI-WB-02-DR-A-200003 Rev P05 MSCP - Level 3
THHR_02-IBI-WB-02-DR-A-200004 Rev P05 MSCP - Level 4
THHR_02-IBI-WB-02-DR-A-200005 Rev P04 MSCP - Level 5
THHR_02-IBI-XX-ZZ-DR-A-251001 Rev P03 East & West Elevations (MSCP)
THHR_02-IBI-XX-ZZ-DR-A-251002 Rev P03 North and South Elevations
THHR_01-IBI-XX-ZZ-DR-A-251101 Rev P05 East Elevation
THHR_01-IBI-XX-ZZ-DR-A-251106 Rev P04 Internal East Elevation through Courtyards
THHR_01-IBI-XX-ZZ-DR-A-251105 Rev P03 Internal West Elevation through Courtyards
THHR_01-IBI-XX-ZZ-DR-A-251104 Rev P04 North Elevation
THHR_01-IBI-ZZ-ZZ-RP-A-251110 Rev P01 Streetscene Elevation North and East
THHR_01-IBI-ZZ-ZZ-RP-A-251120 Rev P01 Streetscene Elevation South and West
THHR_01-IBI-XX-ZZ-DR-A-251102 Rev P04 South Elevation
THHR_01-IBI-XX-ZZ-DR-A-251103 Rev P04 West Elevation
THHR_02-IBI-XX-05-DR-L-700016 Rev P03 MSCP Roof External Works
THHR_01-MMD-XX-XX-DR-U-2003 Rev C01 Access Arrangement Phase 2 Service Access/Colham Green Road
THHR_01-MMD-XX-XX-DR-U-1000 Rev C01 Access Arrangement Phase 1 General Arrangement
THHR_01-MMD-XX-XX-DR-U-1003 Rev C01 Access Arrangement Phase 1 Service Access/Colham Green Road
THHR_01-MMD-XX-XX-DR-U-1105 Rev C01 Access Arrangement Phase 1 Tracking Sheet 6
THHR_01-MMD-XX-XX-DR-U-2202 Rev C01 Access Arrangement Phase 2 General Arrangement Tracking
THHR_01-MMD-XX-XX-DR-U-2000 Rev C01 Access Arrangement Phase 2 General Arrangement
THHR_01-MMD-XX-XX-DR-U-2201 Rev C01 Access Arrangement Phase 2 General Arrangement
THHR_01-MMD-XX-XX-DR-U-2001 Rev C01 Access Arrangement Phase 2 - Main Access Pield Heath Road/Royal Lane
THHR_01-MMD-XX-XX-DR-U-2002 Rev C01 Access Arrangement Phase 2 - Service/Ambulance Yards and A&E Drop Off
THHR_01-MMD-XX-XX-DR-U-2100 Rev C01 Access Arrangement Phase 2 Tracking Sheet 1
THHR_01-MMD-XX-XX-DR-U-2101 Rev C01 Access Arrangement Phase 2 Tracking Sheet 2
THHR_01-MMD-XX-XX-DR-U-2102 Rev C01 Access Arrangement Phase 2 Tracking Sheet 3
THHR_01-MMD-XX-XX-DR-U-2103 Rev C01 Access Arrangement Phase 2 Tracking Sheet 4
THHR_01-MMD-XX-XX-DR-U-2104 Rev C01 Access Arrangement Phase 2 Tracking Sheet 5
THHR_01-MMD-XX-XX-DR-U-2105 Rev C01 Access Arrangement Phase 2
THHR_01-MMD-XX-XX-DR-U-1100 Rev C01 Access Arrangement Phase 1 Tracking Sheet 1
THHR_01-MMD-XX-XX-DR-U-1101 Rev C01 Access Arrangement Phase 1 Tracking Sheet 2
THHR_01-MMD-XX-XX-DR-U-1102 Rev C01 Access Arrangement Phase 1 Tracking Sheet 3
THHR_01-MMD-XX-XX-DR-U-1103 Rev C01 Access Arrangement Phase 1 Tracking Sheet 4
THHR_01-MMD-XX-XX-DR-U-1104 Rev C01 Access Arrangement Phase 1 Tracking

Sheet 5
THHR_01-MMD-XX-XX-DR-U-1105 Rev C01 Access Arrangement Phase 1 Tracking Sheet 6
THHR_01-MMD-XX-XX-DR-U-1106 Rev C01 Access Arrangement Phase 1 Tracking Sheet 7
THHR_01-MMD-XX-XX-DR-U-1002 Rev C01 Access Arrangement Phase 2 - Service/Ambulance Yards and A&E Drop Off
THHR_01-MMD-XX-XX-DR-U-1001 Rev C01 Access Arrangement Phase 1 - Main Access Pield Heath Road/Royal Lane
THHR_01-MMD-XX-XX-DR-U-2203 Rev C01 Phase 2 Land Reserved for Junction Improvement Pield Heath Road/Colham Green Road;

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).

4 COM5 **General compliance with supporting documentation - Joint Con**

JOINT CONDITION

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:
Planning Statement May 2022
Sustainable Waste Management Plan THHR_01-ACM-WS-XX-RP-Y-000027 Rev P01
Whole Life-Cycle Carbon Assessment THHR_01-ACM-ZZ-XX-RP-Y-000020 Rev 01
Archaeological Desk-Based Assessment Rev 001 April 2022
BREEAM Pre-assessment Report THHR_01-RGD-XX-XX-RP-SS-0004 Rev P02
BREEAM Pre-Demolition Audit Report THHR_01-ACM-WS-XX-RP-Y-000028 Rev P01
Basement Impact Assessment THHR_01-ACM-XX-XX-RP-Y-9002 Rev P02
External Lighting Report THHR_01-ACM-ZZ-XX-RP-E-125002 Rev P04
Fire Statement THHR_01-TEN-ZZ-ZZ-RP-FE-000002 Rev P01
Wind Microclimate Study THHR_01-ACM-ZZ-XX-RP-Y-000022 Rev P01
Outline Fire Statement THHR_01-TEN-ZZ-ZZ-RP-FE-000004 Issue P01
Mobility Hub Vision Paper THHR_02-MMD-WB-ZZ-RP-U-2002 Rev C01

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).

5 COM7 **Materials (Submission) - Joint Condition**

JOINT CONDITION

Prior to commencement (excluding demolition and site clearance) of the relevant phase of development details of all materials and external surfaces, including details of balconies have been submitted to and approved in writing by the Local Planning Authority in respect of that phase. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

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

REASON
To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

6 COM10 **Tree to be Retained - Joint Condition**

JOINT CONDITION

Trees, hedges and shrubs shown to be retained on the approved plans shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'. Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

REASON
To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and to comply with Section 197 of the Town and Country Planning Act 1990

7 COM8 **Tree Protection - Joint Condition**

JOINT CONDITION

No site clearance or construction work shall take place within the relevant phase until the details for that phase have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.

2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.
The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:
2.a There shall be no changes in ground levels;
2.b No materials or plant shall be stored;
2.c No buildings or temporary buildings shall be erected or stationed.
2.d No materials or waste shall be burnt; and.
2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

REASON
To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020)

8 NONSC **Biodiversity Net Gain Report - Joint Condition**

JOINT CONDITION

Prior to commencement (excluding demolition and site clearance) of the relevant phase of development a revised Biodiversity Net Gain Report in respect of that phase shall be submitted to and approved in writing by the Local Planning Authority in respect of that phase.

REASON
In order to encourage a wide diversity of wildlife on the site in accordance with Policy G6 of the London Plan (2021).

9 COM29 **No Floodlighting - Joint Condition**

JOINT CONDITION

No floodlighting or other form of external lighting shall be installed within the relevant phase unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority in respect of that phase. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting that is so installed shall not thereafter be altered other than for routine maintenance which does not change its details.

REASON
To safeguard the amenity of surrounding properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020); and To protect the ecological value of the area in accordance with Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020).

10 COM16 **Noise Control Plant & Machinery - Joint Condition**

JOINT CONDITION

For the lifetime of the development hereby permitted the rating level of noise caused by the operation of plant, machinery and equipment 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 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 safeguard the amenity of existing and future residents and the surrounding area in accordance with Policy EM8 of the Hillingdon Local Plan Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

11 COM30 **Contaminated Land - Joint Condition**

JOINT CONDITION

(i) The development hereby permitted shall not commence within the relevant phase (excluding demolition and site clearance) until a scheme to deal with contamination has been submitted and approved by the Local Planning Authority, in consultation with the Environment Agency, in respect of that phase. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:
(a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;
(b) A site investigation, including where relevant soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use.
(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement.

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

(iii) All works which form part of the remediation scheme shall be completed and a verification report submitted to the Council's Environmental Protection Unit before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing.

REASON
To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policies DMEI 11 and DMEI 12 Hillingdon Local Plan Part 2 (2020)

12 NONSC **Traffic Arrangements - Joint Condition**

JOINT CONDITION

Development shall not begin (excluding demolition and site clearance) within the relevant phase until details of all traffic arrangements (including where appropriate carriageways, footways, turning space, safety strips, sight lines at road junctions, kerb radii, car parking areas and marking out of spaces, loading facilities, closure of existing access and means of surfacing) have been submitted to and approved in writing by the Local Planning Authority in respect of that phase. The approved development shall not be occupied until all such works have been constructed in accordance with the approved details. Thereafter, the parking areas, sight lines and loading areas must be permanently retained and used for no other purpose at any time. Disabled parking bays shall be a minimum of 4.8m long by 3.6m wide, or at least 3.0m wide where two adjacent bays may share an unloading area.

REASON
To ensure pedestrian and vehicular safety and convenience and to ensure adequate off-street parking, and loading facilities in compliance with Policy DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Chapter 10 of the London Plan (2021).

13 COM17 **Noise Control Emergency Plant & Machinery - Joint Condition**

JOINT CONDITION

For the lifetime of the development hereby permitted the rating level of noise caused by the operation of emergency plant, machinery and equipment shall no more than 5 dB above the minimum background noise level, or 45 dB(A), whichever is higher, measured 1 metre outside of any window of any 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 safeguard the amenity of existing and future residents and the surrounding area in accordance with Policy EM8 of the Hillingdon Local Plan Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

14 NONSC **Construction Environmental Management Plan - Joint Conditio**

JOINT CONDITION

Prior to the commencement of any relevant phase works on site, a Construction Management and Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with relevant stakeholders including appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction). This plan shall detail:

(i) The phasing of the works;
(ii) The hours of work;
(iii) On-site plant and equipment;
(iv) Measures to mitigate noise and vibration;
(v) Measures to mitigate impact on air quality;
(vi) Waste management;
(vii) Site transportation and traffic management, including:
(a) Routing;
(b) Signage;
(c) Vehicle types and sizes;
(d) Hours of arrivals and departures of staff and deliveries (avoiding peaks times of day);
(e) Frequency of visits;
(f) Parking of site operative vehicles;
(g) On-site loading/unloading arrangements; and
(h) Use of an onsite banksman (if applicable).
(viii) The arrangement for monitoring and responding to complaints relating to demolition and construction; and
(ix) Details of cranes and other tall construction equipment (including the details of obstacle lighting).

This plan should accord with Transport for London's Construction Logistic Planning Guidance and the GLA's 'The Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (July 2014) (or any successor document).

The construction works shall be carried out in strict accordance with the approved plan.

REASON
To safeguard the amenity of surrounding areas and to ensure that the construction works include appropriate efficiency and sustainability measures so as not to compromise the safe and efficient operation of the local highway network and local air quality, in accordance with Policies DMT 1, DMT 2, DMT 7, DMHB 11 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) and Policies D14, SI 1, T4 and T7 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: Part 2 (2020).

15 NONSC **Reducing Emissions from Demolition and Construction - Joint**
JOINT CONDITION

No development shall commence within the relevant phase until details have been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

REASON
In order to reduce the detrimental impact on air quality in accordance 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(e), 186 and 188 of the National Planning Policy Framework (2021).

16 NONSC **Low Emissions Strategy - Joint Condition**
JOINT CONDITION

No development shall commence within the relevant phase (excluding demolition and site clearance) until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority in respect of that phase. The LES shall be focused on making the Travel Plan ambitious and make full use of the PTAL of the application site, and secure building emissions are air quality positive and in alignment with the cleanest technologies in the market for backup generation production. It shall specify as a minimum the following:

1) A clear and effective strategy to encourage staff to:
a) use public transport;
b) cycle / walk to work where practicable;
c) enter car share schemes;
d) purchase and drive to work zero emission vehicles.

2) Provision of a clean supply of energy to the site;
3) Retrofit the diesel backup generators with SCR
4) Presentation of declaration that the use of life saving emergency backup generators will be solely for emergency situations of power failure and operational testing (less than 50 hours per year)

The measures in the agreed scheme shall be maintained throughout the life of the development.

REASON
As the application site is within an Air Quality Management Area, a Focus Area and to reduce the impact on air quality in accordance with Policy EM8 of the Local Plan: Part 1 (November 2012), Policy DMEI 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 T4, and paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2021).

17 NONSC **London Non-Road Mobile Machinery (NRMM) - Joint Condition**

JOINT CONDITION

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases 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" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/."

REASON
In order to reduce the detrimental impact on air quality in accordance 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(e), 186 and 188 of the National Planning Policy Framework (2021).

18 NONSC **Crane Operation Plan - Joint Condition**

JOINT CONDITION

Prior to the commencement of the relevant phase of development a Crane Operation Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Ministry of Defence and Heathrow Airport Limited. The submitted plan shall include, but not be limited to:

- details of any cranes and/or other tall construction equipment to be used to or in support of implementing the development approved;
- a schedule, to include dates and times, for their presence and operation on site;
- details of a liaison protocol through which RAF Northolt can be notified of any amendments to that schedule; and
- details of obstacle lighting that will be used on any crane or tall construction equipment that will be used on site

The approved Crane Operation Plan (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

REASON
To ensure that construction work and the associated equipment used at, or in association with, the development proposed does not obstruct air traffic movements or otherwise impede the effective operation of technical assets in the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

19 NONSC **Bird Hazard Management Plan - Joint Condition**

JOINT CONDITION

Prior to above ground works of the relevant phase, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Ministry of Defence and Heathrow Airport Limited in respect of that phase. The submitted plan shall include details of:

- management of any flat/shallow pitched on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'.
- signs deterring people from feeding the birds.

The Bird Hazard Management Plan shall be implemented as approved on completion of the development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

REASON
In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

20 NONSC **Groundwater Monitoring & Maintenance Plan - Joint Condition**

JOINT CONDITION

No development shall take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority in consultation with the Environment Agency, has been submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

REASON
To ensure that the site does not pose any further risk to the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 174 of the National Planning Policy Framework.

21 NONSC **Borehole Management Scheme - Joint Condition**

JOINT CONDITION

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Environment Agency. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

REASON
To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 174 of the National Planning Policy Framework and Position Statement N Groundwater resources of 'The Environment Agency's approach to groundwater protection'.

22 NONSC **Piling Method Statement - Joint Condition**

JOINT CONDITION

No piling shall take place within the relevant phase until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water in respect of that phase.

Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON
The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

23 NONSC **Waste Streams - Joint Condition**

JOINT CONDITION

Prior to development commencing a Waste Materials Destination Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Greater London Authority. The Plan shall include written confirmation that the destination landfill(s) has/have the capacity to receive the relevant quantities of waste.

REASON
To ensure that waste will be managed in accordance with Policy SI 7 of the London Plan (2021).

24 NONSC **Height Limitation on Buildings & Structures - Joint Conditio**

JOINT CONDITION

No building or structure of the development shall be permitted to infringe the Obstacle Limitation Surface (OLS) known as the Conical surface. This is a sloping surface that passes over this site from the Southern boundary (77m Above Ordnance Datum (AOD)) to the Northern boundary (89m AOD) on a 1:20 gradient.

REASON
Any development that penetrates the OLS surrounding Heathrow Airport could endanger aircraft movements and the safe operation of the aerodrome.

25 NONSC **Changes of Use Hospital - Phase 1 Condition**

PHASE 1 CONDITION

Notwithstanding the provisions of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-

enacting that Order with or without modification), the hospital building proposed shall be used solely for the provision of medical or health services (Use Class E(e)) and not within other uses within Use Class E unless they are ancillary to the main Hospital use.

REASON
To protect the vitality and viability of town and local centres in accordance with Policy E5 of the Hillingdon Local Plan Part One: Strategic Policies (November 2012), Policy DMTC 1 of the Hillingdon Local Plan Part 2 (2020), and Policies SD6 and SD7 of the London Plan (2021) and the National Planning Policy Framework.

26 NONSC **Surface Water Drainage - Phase 1 Condition**

PHASE 1 CONDITION

Prior to commencement of development (excluding demolition and site clearance) a detailed surface water drainage scheme shall be submitted to and approved in writing by Local Planning Authority. The drainage strategy shall detail:
1. Results of porosity tests across the site (at agreed locations) to determine the permeability of the ground in order to establish the impact the ground conditions have on storage of water in the 1 in 100 year storm event (plus 40% allowance for climate change).
2. Full surface water drainage plans and necessary reports/commetary that show:
a. The use, type and location of sustainable urban drainage systems (in accordance with the London Plan drainage hierarchy) that demonstrate the attenuation of 4,355m3 (unless otherwise agreed in writing with the Local Planning Authority) of surface water run-off in the 1 in 100 year storm event (plus 40% allowance for climate change).
b. The outfalls and connections to surface water sewers and demonstration that the greenfield run-off rate in the 1 in 100 year storm event (plus 40% allowance for climate change) will be achieved.
c. Details of hydrobrakes, overflow routes and exceedance routes
d. Details of how subsurface drainage features are protected from the unintended ingress of water (ground or surface)
3. The scheme shall also provide details of the monitoring and maintenance regime to ensure the drainage scheme will remain at optimum efficiency and effectiveness over the lifetime of the development.

The development must proceed and be operated in accordance with the approved scheme and arrangements.

REASON
To ensure the development does not increase the risk of flooding in accordance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policies SI12 and SI13.

27 NONSC **Foul Water Drainage - Phase 1 Condition**

PHASE 1 CONDITION

Prior to commencement of development (excluding demolition and site clearance) a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of the discharge rates and requirements, the capacity of the receiving network and detailed plans and drawings showing connections to the wider network.

The development shall proceed in accordance with the approved details.

REASON
To ensure the development achieves an effective foul drainage solution in accordance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policies SI12 and SI13.

28 COM9 **Landscaping - Phase 1 Condition**

PHASE 1 CONDITION

No development (excluding demolition and site clearance) shall take place within Phase 1 until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority in respect of that phase. The scheme shall include: -

1. Details of Soft Landscaping
1.a Planting plans (at not less than a scale of 1:100),
1.b Written specification of planting and cultivation works to be undertaken,
1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
2.a Refuse Storage
2.b Cycle Storage
2.c Means of enclosure/boundary treatments
2.d Car Parking Layouts (including 781 car parking spaces in the MSCP for staff, patients and visitors to include 46 disabled spaces, 31 accessible (enlarged) spaces, 4 car club spaces, 147 of the spaces to be provided with active electrical charging provision and 77 spaces with passive electrical vehicle charging provision. In addition 161 car parking spaces to be provided in the surface car park for patients and visitors to include 10 disabled spaces, 7 accessible spaces, 25 of the spaces to be provided with active electrical charging provision and 15 spaces with passive electrical vehicle charging provision. Plus 336 long-stay and 56 short-stay cycle parking spaces.
2.e Hard Surfacing Materials
2.f External Lighting
2.g Other structures (such as play equipment and furniture)

3. Living Walls and Roofs
3.a Details of the inclusion of living walls and roofs
3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance
4.a Landscape Maintenance Schedule for a minimum period of 5 years.
4.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.

5. Schedule for Implementation

6. Other
6.a Existing and proposed functional services above and below ground
6.b Proposed finishing levels or contours

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

REASON
To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies of the London Plan (2021).

29 NONSC **Mobility Hub Management Plan - Phase 1 Condition**

PHASE 1 CONDITION

Prior to development of the MSCP (excluding demolition and site clearance) commencing, a Mobility Hub Management Plan (MHMP) shall be submitted to, and approved in writing by, the Local Planning Authority. The MHMP shall include, but not be limited to, details on opening hours, public transport information systems & ticketing, car club arrangements, electrical vehicle charging, cycle parking arrangements, security & repair, access measures, e-bike charging, priority car share spaces and other measures to support sustainable and active travel.

REASON
To ensure that the proposed development will provide adequate facilities in compliance with Policies T1, T5 and T6 of the London Plan (2021) and Policies DMT 1, DMT 2, DMT 4 and DMT 6 of the Hillingdon Local Plan Part 2 (2020).

30 NONSC **Parking Design & Management Plan (PDMP) - Phase 1 Condition**

PHASE 1 CONDITION

Prior to development (excluding demolition and site clearance) commencing, a Parking Design & Management Plan (PDMP) shall be submitted to, and approved in writing by, the Local Planning Authority. The PDMP shall include detail on how parking spaces at this site will be managed, including how parking charges for hospital parking will be reviewed, and car parking spaces will be reduced and repurposed to support achieving a strategic modal shift and the targets contained within the Travel Plan.

REASON
To ensure that the proposed development will provide adequate facilities in compliance with Policies T1, and T6 of the London Plan (2021) and Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020).

31 NONSC **Emission Reduction and Management Plan - Phase 1 Condition**

PHASE 1 CONDITION

Prior to operation of the development, an Emission Reduction and Management Plan (ERMP) for the development, shall be submitted to and approved in writing by the Local Planning Authority. This shall outline and commit to a programme for carrying out a viability study to review emissions performance and alternative options for the diesel backup units, with clear time scales, to be submitted no later than year of operation 21. The viability study shall be based on the BAT (best available technology) principle giving weigh to sustainability principles and aligned with the objectives of the Borough on improving air quality. This shall include but is not limited to the following:
(i) A review of options for reducing NOx and PM2.5 emissions impacts for the National Grid power failures;
(ii) A review of options for reducing NOx and PM2.5 emissions for the testing regimes;
(iii) A review of options for reducing NOx and PM2.5 emissions by improved SCR systems /alternative retrofitting systems

(iv) A review of options for reducing NOx and PM2.5 emissions by alternative fuels
(v) A feasibility study including benefit analysis for potential upgrades of the backup generators or other changes to infrastructure (e.g. SCR), type of fuel, generator type and operational regimes on site that could reduce emissions over time; alternative emergency backup solutions are to be also evaluated, e.g. fuel cells, etc.
(vi) Use of the above information to propose appropriate changes in the generators type, selection of generators or other potential options for decreasing emissions over time no later than year 21; and
(vii) Proposal of an appropriate timescale for improvements.

Thereafter the development shall be implemented and operated in accordance with these details.

REASON
As the application site is within an Air Quality Management Area, within a LBH Air Quality Focus Area and in close proximity to sensitive receptors, and to reduce the impact on air quality in accordance 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(e), 186 and 188 of the National Planning Policy Framework (2021).

32 NONSC **Back Up Generator Testing - Phase 1 Condition**

PHASE 1 CONDITION

The back up generators hereby approved shall be limited to a maximum of 14 hours of testing per calendar year.

REASON
In order to reduce the detrimental impact on air quality in accordance 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(e), 186 and 188 of the National Planning Policy Framework (2021).

33 NONSC **Energy Strategy - Phase 1 Condition**

PHASE 1 CONDITION

Within 6 months of commencement of Phase 1 the applicant shall submit a scheme for the recording and monitoring of the onsite carbon savings within the Hospital Redevelopment (where practical and feasible) as set out in the Energy Strategy (THHR_01-ACM-ZZ-XX-RP-Y-000019, Aecom, April 22). The scheme must be agreed 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 ensure the development contributes to the management of carbon emissions in accordance with Policy SI 2 of the London Plan (2021).

34 NONSC **Access Drop off - Phase 1 Condition**

PHASE 1 CONDITION

Prior to above ground works, an Accessibility Drop-off Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include details of the location, 'free of charge' time limit and management procedures for the Accessible drop off facility to ensure that the development is accessible.

REASON
To ensure that the proposed development will provide adequate facilities in compliance with Policies D5 and D7 of the London Plan (2021).

35 NONSC **Delivery, Servicing & Waste Management Plan - Phase 1 Condit**

PHASE 1 CONDITION

Prior to occupation of the Phase 1 of the development, a Delivery, Servicing and Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority relevant to that phase. Thereafter, servicing, delivery and collection of refuse shall be carried out as agreed within this approved plan.

REASON
To ensure appropriate servicing of the site, to safeguard highway safety, and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

36 COM11 **Changes of Use Retail - Phase 2 Condition**

PHASE 2 CONDITION

Notwithstanding the provisions of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no greater than 200 square meters of floor space shall be used for the display and sale of goods Use Class E(a).

REASON
To protect the vitality and viability of town and local centres in accordance with Policy E5 of the Hillingdon Local Plan Part One: Strategic Policies (November 2012), Policy DMTC 1 of the Hillingdon Local Plan Part 2 (2020), and Policies SD6 and SD7 of the London Plan (2021) and the National Planning Policy Framework.

37 NONSC **Changes of Use Commercial - Phase 2 Condition**

PHASE 2 CONDITION

Notwithstanding the provisions of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), the 'Town Centre Uses' proposed within Phase 2, as shown on drawing number THHR_01-PRP-WS-ZZ-DR-A-200018 Rev P04 shall fall within Use Classes E(a), E(b) and E(c iii).

REASON
To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 and DMT 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

38 NONSC **Housing Mix - Phase 2 Condition**

PHASE 2 CONDITION

The proposed housing mix within the reserved matters application/s shall provide a minimum of 20% of the units as three and four bedroom units.

REASON
To ensure that quantum of development keeps within the parameters assessed in accordance with Policy H10 of the London Plan (2021).

39 NONSC **Maximum Residential GIA and Unit Number - Phase 2 Condition**

PHASE 2 CONDITION

The proposed land uses within the reserved matters (outline area) shall be strictly in accordance with the maximum floor area of 31,503 sqm GIA (Use Class C3) comprising of up to 327 residential units.

REASON
To ensure that he development is carried out in accordance with the approved plans and other submitted details and to ensure the quantum of development keeps within the parameters assessed in accordance with Policy DMHB 17 of the Hillingdon Local Plan: Part 2 (2020).

40 NONSC **Design Code - Phase 2 Condition**

PHASE 1 CONDITION

Prior to commencement of any works (except for demolition, ground and enabling works) within the outline area a detailed Design Code shall be submitted and approved in writing and Reserved Matters applications shall conform with the approved Design Code.

The development shall thereby be carried out in accordance with the approved design Code. The Design Code shall provide the following information:

1. Introduction
a. Purpose of the Code
b. The Vision
c. The Site (and its context)
d. Planning Context
e. Design Principles
f. Structure of the Code
g. Instructions for Use

2. Overarching Design Code Principles
a. Land Use and Amount
b. Layout
c. Scale and Massing
d. Access, Movement and Parking
e. Landscape and Public Realm
f. Private and Community Amenity Space and Playspace
g. Typical Development Blocks

3. Character Areas and Street Types
a. Character and Approach

4. Detailed Design Code Principles
a. Built Form and Architectural Detail

b. Material Strategy
c. Energy and Sustainability
d. Car and Cycle Parking Strategy
e. Utilities and Servicing
f. Waste and Recycling
g. Lighting Strategy
h. Design Standards

5. Residential Unit Typologies
a. Residential Unit Types
b. Duplexes and Podium Housing Blocks
c. Apartment Blocks

6. Glossary of Terms

REASON
To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020)

41 NONSC **Minimum Quantum of Public Open Space - Phase 2 Condition**

PHASE 2 CONDITION

The proposed land uses within the reserved matters (outline area) shall provide a minimum of 4590 sqm of Public Open Space.

REASON
To ensure that the development provides an appropriate quantum of Public Open Space in accordance with Policy G4 of the London Plan (2021), Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020).

42 NONSC **Surface Water Drainage - Phase 2 Condition**

PHASE 2 CONDITION

Prior to commencement of development (excluding demolition and site clearance) of Phase 2, a surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate the use of sustainable drainage systems in accordance with the London Plan drainage hierarchy that shows the development will (a) provide at least 3,650m3 of attenuation capacity and (b) achieve greenfield runoff rates in 1 in the 100 year storm event (plus 40% allowance for climate change).

The scheme shall be accompanied by details of the monitoring and maintenance regime to ensure the long term efficacy of the surface water drainage scheme.

The development must proceed in accordance with the approved scheme.

REASON
To ensure the development does not increase the risk of flooding in accordance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policies SI12 and SI13.

43 NONSC **Foul Water Drainage - Phase 2 Condition**

PHASE 2 CONDITION

Prior to commencement of development (excluding demolition and site clearance) of Phase 2, a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of the discharge rates and requirements, the capacity of the receiving network and detailed plans and drawings showing connections to the wider network.

The development shall proceed in accordance with the approved details.

REASON
To ensure the development achieves an effective foul drainage solution in accordance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policies SI12 and SI13.

44 NONSC **Landscaping - Phase 2 Condition**

PHASE 2 CONDITION

No development (excluding demolition and site clearance) shall take place within Phase 2 until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority in respect of that phase. The scheme shall include: -

1. Details of Soft Landscaping
1.a Planting plans (at not less than a scale of 1:100),
1.b Written specification of planting and cultivation works to be undertaken,
1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
2.a Refuse Storage
2.b Cycle Storage
2.c Means of enclosure/boundary treatments
2.d Car Parking Layouts showing a maximum ratio of 0.75 spaces per unit (including demonstration that at least 20% of all parking spaces are served by active electrical vehicle charging points and all remaining spaces served by passive electrical vehicle charging points)
2.e Hard Surfacing Materials
2.f External Lighting
2.g Other structures (such as play equipment and furniture)

3. Living Walls and Roofs
3.a Details of the inclusion of living walls and roofs
3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance
4.a Landscape Maintenance Schedule for a minimum period of 5 years.
4.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.

5. Schedule for Implementation

6. Other
6.a Existing and proposed functional services above and below ground
6.b Proposed finishing levels or contours

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

REASON
To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies of the London Plan (2021).

45 COM31 **Secured by Design - Phase 2 Condition**

PHASE 2 CONDITION

The Residential building(s) 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 building within the relevant phase shall be occupied until accreditation has been achieved.

REASON
In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan Part 2 and London Plan (2021) Policies D11 and D12.

46 NONSC **Energy Assessment - Phase 2 Condition**

PHASE 2 CONDITION

Prior to commencement of the outline development (excluding demolition and site clearance), a detailed Energy Assessment shall be submitted to and approved in writing by the Local Planning Authority in respect of the outline development. The assessment shall accord with the requirements of Policy SI2 of the London Plan and the GLA Energy Assessment Guidance (April 2020 or as amended). The assessment shall clearly identify the baseline energy demand and associated carbon emissions in accordance with the prevailing building regulation requirements. The assessment shall then 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. Where the measures do not collectively contribute to a zero carbon saving (noting a minimum requirement of 35% saving onsite) to the agreement of the Local Planning Authority, the report shall set out (a) the 'onsite saving' and (b) the 'shortfall'; both to be presented in tCO2/annum.

The 'shortfall' shall then be subject to an offsite contribution in accordance with the London Plan (2021) Policy SI2.

The Energy Assessment shall also provide details of the 'be seen' recording and reporting measures to be agreed in writing by the Local Planning Authority. The 'be seen' measures must comply with the requirements of London Plan (2021) Policy SI2 and demonstrate that the 'onsite saving' is be achieved.

The development must proceed and be operated in accordance with the approved details.

REASON

To ensure the development contributes to the management of carbon emissions in accordance with Policy SI 2 of the London Plan (2021).

47 NONSC **Fire Strategy Report - Phase 2 Condition**

PHASE 2 CONDITION

A Fire Strategy Report for Phase 2 shall be submitted to and agreed in writing by the local planning authority in consultation with the Health and Safety Executive prior to above ground works. Thereafter it shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approve details.

REASON
To ensure that the development meets Fire Safety Standards in accordance with policy D12 of the London Plan (2021).

48 NONSC **Delivery, Servicing & Waste Management Plan - Phase 2 Condit**

PHASE 2 CONDITION

Prior to occupation of the Phase 2 of the development, a Delivery, Servicing and Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority relevant to that phase. Thereafter, servicing, delivery and collection of refuse shall be carried out as agreed within this approved plan.

REASON
To ensure appropriate servicing of the site, to safeguard highway safety, and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

49 NONSC **M4(3)/M4(2) - Phase 2 Condition**

PHASE 2 CONDITION

The dwellings hereby approved shall ensure that 90% be constructed to meet the standards for a Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building. the remaining 10% of all units shall be constructed to accord with the technical specifications of Section M4(3)(2)(b) for a Wheelchair Accessible dwelling as set out in Approved Document M to the Building Regulations 2010 (2015 edition).

REASON
To ensure that sufficient housing stock is provided, in accordance with Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) and Policies D5 and D7 of the London Plan (2021).

50 NONSC **Overheating - Phase 2 Condition**

PHASE 2 CONDITION

Prior to commencement of superstructure works of Phase 2, the final Overheating Strategy shall be submitted to and approved in writing by the Local Planning Authority. The submission shall demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
1) reduce the amount of heat entering a building through orientation, shading, high albedo

materials, fenestration, insulation and the provision of green infrastructure;
2) minimise internal heat generation through energy efficient design;
3) manage the heat within the building through exposed internal thermal mass and high ceilings;
4) provide passive ventilation;
5) provide mechanical ventilation;
6) provide active cooling systems; and
7) Control heating within communal areas.

The approved details shall thereafter be implemented and retained for the lifetime of the development.

REASON
To demonstrate that the final strategy will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy and Policy SI 4 if the London Plan (2021).

51 COM22 **Operating Hours - Phase 2 Condition**

PHASE 2 CONDITION

The commercial premises shall not be open for customers outside the following hours: -
0800 and 2200 Mondays - Fridays
0800 to 2200 Saturdays
1000 to 1800 Sundays, Public or Bank Holidays.

REASON
To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

52 COM20 **Air extraction system - Phase 2 Condition**

PHASE 2 CONDITION

No air extraction system shall be used on the premises within Phase 2 until details for the control of noise and odour emanating from the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include such combination of measures as may be approved by the LPA. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

REASON
To safeguard the amenity of the occupants of surrounding properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020)

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 - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMAV 1	Safe Operation of Airports
DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 2	New Community Infrastructure
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
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 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 6	Development in Green Edge Locations
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
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMT 7	Freight
EM6	(2012) Flood Risk Management

LPP D10	(2021) Basement development
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 D2	(2021) Infrastructure requirements for sustainable densities
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 D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E1	(2021) Offices
LPP E11	(2021) Skills and opportunities for all
LPP G1	(2021) Green infrastructure
LPP G4	(2021) Open space
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP G9	(2021) Geodiversity
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG3	(2021) Creating a healthy city
LPP GG4	(2021) Delivering the homes Londoners needs
LPP GG6	(2021) Increasing efficiency and resilience
LPP H1	(2021) Increasing housing supply
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 HC1	(2021) Heritage conservation and growth
LPP HC3	(2021) Strategic and Local Views
LPP HC6	(2021) Supporting the night-time economy
LPP S1	(2021) Developing London's social infrastructure
LPP S2	(2021) Health and social care facilities
LPP S3	(2021) Education and childcare facilities
LPP S4	(2021) Play and informal recreation
LPP S5	(2021) Sports and recreation facilities
LPP SD10	(2021) Strategic and local regeneration
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI5	(2021) Water infrastructure
LPP SI6	(2021) Digital connectivity infrastructure

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 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
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
LPP T8	(2021) Aviation
LPP T9	(2021) Funding transport infrastructure through planning
NPPF	National Planning Policy Framework 2021

3

Definitions; All reference to:

'Phase 1' refers to the detailed application and includes Phase 1A, Phase 1B and Phase 1C.

'Phase 2' refers to the outline element of the application.

4 I15 Control of Environmental Nuisance from Construction Work

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance' The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit (www.hillingdon.gov.uk/noise Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

5 I47 Damage to Verge - For Council Roads:

The Council will recover from the applicant the cost of highway and footway repairs, including damage to grass verges.

Care should be taken during the building works hereby approved to ensure no damage occurs to the verge or footpaths during construction. Vehicles delivering materials to this development shall not override or cause damage to the public footway. Any damage will require to be made good to the satisfaction of the Council and at the applicant's expense.

For further information and advice contact - Highways Maintenance Operations, Central Depot - Block K, Harlington Road Depot, 128 Harlington Road, Hillingdon, Middlesex, UB3 3EU (Tel: 01895 277524).

For Private Roads: Care should be taken during the building works hereby approved to ensure no damage occurs to the verge of footpaths on private roads during construction. Vehicles delivering materials to this development shall not override or cause damage to a private road and where possible alternative routes should be taken to avoid private roads. The applicant may be required to make good any damage caused.

6 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.

7 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. 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

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.

8

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the

roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances, it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

Landscaping
The development is close to the airport and the landscaping which it includes may attract birds which in turn may create an unacceptable increase in birdstrike hazard. Any such landscaping should, therefore, be carefully designed to minimise its attractiveness to hazardous species of birds. Your attention is drawn to Advice Note 3, 'Potential Bird Hazards: Amenity Landscaping and Building Design' (available at http://www.aoa.org.uk/policy-campaigns/operations-safety/

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Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf

10

Thames Water advise that as required by Building Regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the buildings to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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Please read Thames Water guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water expect the developer to demonstrate what measures they will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line. Please refer to the Wholsesale; Business customers; Groundwater discharges section.

13

The Environment Agency recommend that developers should:
- Follow the risk management framework provided in Land Contamination: Risk Management (formerly CLR11), when dealing with land affected by contamination.
- Refer to the Environment Agency Guiding Principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. The Planning Practice Guidance defines a Competent Person (to prepare site investigation information): "A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation." (http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary)
- Refer to the contaminated land pages on GOV.UK for more information.

The Environment Agency expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. e.g., British Standards when investigating potentially contaminated sites and groundwater, and reference with these documents:
- BS5930:2015 Code of practice for site investigations;
- BS 10175:2011 A1:2013 Code of practice for investigation of potentially contaminated sites;
- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;
- BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns but more may be required to establish the conceptual site model and groundwater quality. See RTM 2006 and MNA guidance for further details)
- BS ISO 18512:2007 Soil Quality. Guidance on long-term and short-term storage of soil samples
- BS EN ISO 5667:3- 2018. Water quality. Sampling. Preservation and handling of water samples
- Use MCERTS accredited methods for testing contaminated soils at the site.
- Guidance on the design and installation of groundwater quality monitoring points Environment Agency 2006 Science Report SC020093 NB. The screen should be located such that at least part of the screen remains within the saturated zone during the period of monitoring, given the likely annual fluctuation in the water table. In layered aquifer systems, the rs zone should be of an appropriate length to prevent connection between different aquifer layers within the system.

A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out.

The following should be considered:
- Use MCERTS accredited methods for testing contaminated soils at the site
- The DQRA report should be prepared by a "Competent person" (e.g., a suitably qualified hydrogeologist). The DQRA should be based on site-specific data, however in the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.
- Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m. Further guidance is available at: https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments

Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with the Land Contamination: Risk Management guidance.

Competent Persons
Any remediation strategy must be carried out by a competent person, in line with paragraph 183 of the National Planning Policy Framework. The National Planning Policy Framework defines a "Competent Person (to prepare site investigation): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation".

SUDs
Where SUDs are proposed - Infiltration SUDs should not be located in unsuitable and unstable ground conditions such as land affected by contamination or solution features. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit. Further advice is available in the updated CIRIA SUDs manual http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx

Piling
For piling (or other deep penetrative) works, where the piles (or other deep structures) extend into aquifer units within SPZ1, a foundation works risk assessment and groundwater monitoring programme will be required. The foundation works risk assessment should consider potential risks to groundwater resources that could arise as a result of deep piling works. A groundwater monitoring programme should be designed to collect information prior to and during the works to demonstrate that any piling (or other deep penetrative) works are not having an adverse impact on groundwater quality in the area. The piling risk assessment and groundwater monitoring plan should provide a mitigation / action plan should an adverse impact to groundwater quality be noted during the works.

Within SPZ1, the Environment Agency recommend that real-time monitoring for in-situ groundwater quality parameters, including conductivity and turbidity, should be incorporated into the groundwater monitoring plan as these provide valuable on-site data that can enable rapid decision making with respect to mitigations if required.

A brief introduction to the potential hazards associated with piling through contaminated soils can be found:
http://webarchive.nationalarchives.gov.uk/20140328084622/http:/cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf

Monitoring wells installed to support a piling risk assessment should be installed to at least 5m deeper than the deepest piled foundation to capture any impacts from the proposed groundworks during and post construction.

Waste off-site
Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:
- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period the developer will need to register with us as a hazardous waste producer. Please refer to the waste management page on GOV.uk for more information.

Material Re-use on-site
The CL:AIRE Definition of Waste: Development Industry Code of Practice (Version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:
- excavated materials that are recovered via a treatment operation can be re-used on-site provided they are treated to a standard such that they fir for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites
- developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommend that developers should refer to:
- The position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on GOV.uk

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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.

The Applicant is advised to review Guidance note 29 on Fire Brigade Access similar to that in B5 of the Building Regulations, Particular attention should be made to paragraph 16, Water Mains and Hydrants, by the applicant. If there are any deviations from the guidance in ADB) vol 1 and 2: B5 Access and facilities for the fire service in relation to water provisions, then this information needs to be provided to the Water Office (water@london-fire.gov.uk) to discuss the proposed provision.

If there are any deviations to Brigade access and facilities, then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision. Once London Fire Brigade have received this information then the they can provide a response on the consultation. Advice in regard to hydrants upon receipt of an appropriate site plan showing premises layout, access to it, and water supply infrastructure if available.

15

Prior to demolition and construction starting on site, and allowing sufficient time for any statutory determination period, an application should be made to the Council for prior consent under Section 61 of Control of Pollution Act 1974. This shall include descriptions of best practicable means to control noise and vibration, monitoring arrangements and community engagement that will be used.

16 I25 **Consent for the Display of Adverts and Illuminated Signs**

This permission does not authorise the display of advertisements or signs, separate consent for which may be required under the Town and Country Planning (Control of Advertisements) Regulations 1992. [To display an advertisement without the necessary consent is an offence that can lead to prosecution]. For further information and advice, contact - Residents Services, 3N/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250574).

3. CONSIDERATIONS

3.1 Site and Locality

The Hillingdon Hospital application site is 9.5 hectares in area and is located within an urban area of Hillingdon that is situated south of Pield Heath Road that is bound to the west by Royal Lane and to the east by Colham Green Road. The existing hospital delivers healthcare services to patients who are not only located within the London Borough of Hillingdon, but also those living in the surrounding areas of Ealing, Harrow, Buckinghamshire and Hertfordshire.

The existing Hillingdon Hospital site has an eclectic mix of buildings dating from the 1940s with a total GIA of 57,539 sqm. The main hospital building was built in the 1960s and is situated towards the centre of the site and dominates the local area at 10-storeys. A mix of other hospital buildings are scattered across the area interspersed with surface level car parking and pockets of landscaping. The site has been developed on an adhoc and piecemeal basis since the 1940s rather than being planned based and on the needs of the hospital at different times.

The Hillingdon Hospital is largely life expired, with some elements being built in the 1940s

as emergency wartime accommodation, which are still in use today. The six facets survey report conducted in 2021 identified that 80% of the hospital building will require major repair or replacement soon. The severity of these issues is clear through the Estates Returns Information Collection (ERIC) data returns, which show that Hillingdon Hospital now has the highest high-risk maintenance backlog of any general acute site in England, on a per area basis (ERIC data returns 2018/19).

Works have been undertaken and more are planned to enable the Trust to continue providing services safely in the short term, however, it has been estimated that if the Trust were to undertake all the necessary repairs required to eradicate the high-risk backlog it would cost in excess of £124m and many of the repairs would not be long term solutions.

For patients, the Trust consider the layout of the current site makes it difficult to get around and the condition of buildings can make the experience of being in hospital more difficult. The Trust's most recent Care Quality Commission report (2018) highlighted issues of patient safety, dignity and patient experience, which have directly resulted from the outdated estate. The site layout and state of disrepair can also make it difficult for our staff to do their jobs as efficiently and effectively as they would like. These issues contribute to the Trust's financial deficit and hinder their mission to provide high quality, safe and compassionate care to improve the health and wellbeing of the people they serve.

The vast majority of buildings on site are functional hospital buildings of little or no architectural or historic interest. No objection would be raised to their demolition in principle subject to a high-quality replacement scheme. The buildings in their current condition generally detract from the visual amenity of the local area and would not be regarded as non-designated heritage assets.

Notwithstanding the above there is a listed building (The Furze grade II) located on the eastern side of the site adjacent to Colham Green Road. This former country house dates from the early C19 and is of architectural and historic interest. This building is to be retained and there recently consented planning and listed building consent applications for the repair of the building along with sympathetic alterations to provide an Adult Audiology Haematology, Education Centre and Clinical Admin Offices.

The site is not within a Conservation Area, however Hillingdon Village Conservation Area is situated to the north of the development site and contains the original village of Hillingdon. The area contains a number of statutory listed buildings, including the Grade II Bishopshalt Grammar School, Grade II Cottage Hotel, Grade II* Church of St John. Grade II* Cedar's House and the Red Lion Public House Grade II. The majority of the statutory and locally listed buildings are situated within the northern part of the Conservation Area with only Bishopshalt Grammar School in the southern part.

Cowley Church Conservation Area is located to the west of the application site. It also contains a number of statutory and locally listed buildings including the Grade II* Church of St. Laurence, Grade II Bell House and the locally listed 1 & 2 Manor Lodge. These assets are located with the northern most portion of the area with the majority of the conservation area to the south comprising undeveloped open space until it reaches the buildings of Manor Farm to the south.

The application site is located within Flood Risk Zone 1. There are two Tree Preservation Order (TPO) areas on the site. One is located south of the site in the Woodlands area (TPO 625), while the second (TPO 411) is on the south east corner of the site below the Grade Listed II Building The Furze. A culvert runs west-east crossing both TPO's.

According to the supporting Arboricultural Statement, there are 192 trees on the site and adjoining land outside of the application boundary. These are judged as being mostly moderate and low-quality trees. However, there are 6 high quality trees which have been assessed as stand out specimens.

The site's immediate context is predominantly 2-3 storey suburban houses and flats with the exception of the 4-storey late 20th century flats to the north side of Pield Heath Road that provides access into a residential Cul-de-Sac. The Hillingdon Estates Department is located north of this Cul-de-Sac and its incinerator can be seen in longer distance views due to the structures being taller than the surrounding buildings.

To the west of the site along Royal Lane and beyond can be found traditional two-storey detached, semi-detached and terraced housing with tiled pitched roofs and traditional facing materials of brick and render. Similar properties are also found directly to the south covering an extensive area. Within these housing estates can be found large areas of green recreational space including Pield Heath to the west and Colham Green Recreational Ground to the east along with areas of Green Belt land.

The remainder of the hospital site consists mainly of car parking, interspersed with pockets of landscaping consisting largely of patches of grass and groups of trees.

The proposed new hospital building would be sited to the west of the site with the proposed multi store car park located in the north east corner. The majority of these areas are currently surface level car parking.

The existing site provides 977 car parking spaces on-site, though this number continues to fluctuate due to ongoing construction works and ad-hoc loss of spaces due to specific activities on-site. It is noted that The Trust also lease a further 175 spaces off-site which are all allocated to specific staff, though at least 75 of these will be withdrawn in the near future.

There are several points of access to the site. The main entrance is from Pield Heath Road with a separate access for A&E. There are three separate accesses from Royal Lane and a separate access from Colham Green Road.

The site has a PTAL rating of 3, but due to the constrained and impermeable nature of the hospital estate, the PTAL level drops to 2 and then 0 within the centre of the site. The closest London Underground Station to Hillingdon Hospital is Uxbridge (Metropolitan and Piccadilly lines), approximately 3.7km to the north. There are also the National Rail and Crossrail services from West Drayton, approximately 2.7km to the southwest. At Uxbridge, the Metropolitan and Piccadilly lines can be accessed. From there, the U1, U3, U4, U5 or U7 buses serve the hospital with a journey time of approximately 12 minutes. The site is served by 6 bus routes operating along Pield Heath Road, with the nearest stops near the main entrance in Pield Heath Road.

3.2 Proposed Scheme

The hybrid planning application proposes to redevelop the Hospital site with the demolition of existing buildings and the erection of a new hospital, multi-storey car park, mobility hub, commercial floorspace and up to 327 residential units. The new Hospital building and MSCP would be located to the west of the site and included within Phase 1, for which detailed planning consent is applied for. The hybrid application also includes an outline application for the residential led development to the central and western parts of the site.

The residential element is proposed to be 54% affordable housing by habitable room.

The areas of the site are split into 4 phases, Phase 1a, Phase 1b, Phase 1c and Phase 2. The phasing strategy is dictated by the need to keep the existing hospital operational at all times during development. Phase 1 comprises the works required to build and develop the hospital and the elements required to make the hospital acceptable.
Phase 2 is the outline application area for the residential development.

Following feedback during the course of the application, the proposals have been revised to facilitate the diversion of buses internally through the site following the clearance of the wider site. As there is the critical need to keep the wider hospital operational, an interim solution is therefore required to facilitate the opening of the hospital until such a time that the existing hospital is demolished and the internal bus route can be provided.

The phases can be summarised as follows:
Phase 1A - The proposals required to permit the opening of the new hospital including the MSCP, access, landscaping, generators, servicing, oxygen tanks and road junction improvements. The proposals which form phase 1A will remain fixed and will not require any alteration to facilitate the subsequent phases of work.

Phase 1B - The interim proposals which will be delivered alongside Phase 1A and allow the hospital to function but will eventually be modified or replaced by the final part (Phase 1C) of the detailed application. These comprise the loop road located directly in the front of the hospital building and minor highway works.

Phase 1C - The proposals that can only be developed upon demolition of the existing hospital comprising the central public open space, surface car park, woodland, new road/ junction and internal bus stops and roads. Phase 1C will entirely replace Phase 1B and complete the extent of the detailed application.

Phase 2 - Outline: The wider masterplan for residential uses which will comprise three residential blocks (P01, P02, and P03) and associated landscaping, access, servicing, and car parking.

Application Timelines
Given the various phases of development pursuant to the hybrid planning application, the proposals seek planning permission for various lengths of time across the Phases 1A-C, and Phase 2. The expected and indicative timeframes for construction of the relevant phases are set out below:
- Expected indicative period of demolition of Phase 1A-B Area - Commence September 2022 - Complete December 2023 (prior approval has been granted for the relevant demolition).
- Expected indicative construction period of Phase 1A-B (delivery of the hospital and MSCP) -- Commence February 2025 - Complete August 2028.
- Expected indicative construction period of Phase 1C - bus diversion, central open space, woodlands. - Commence January 2029 - Complete May 2030.
· Expected indicative timeframe for commencement of Phase 2 - Commence May 2030.

The proposals therefore require planning permission for Phases 1-B for a period of 3 years, and Phases 1C and 2 which will deliver the final components of the detailed proposals and wider masterplan within a period of 8-10 years. A phasing plan and associated S106 obligations will be required to secure the permission for this period of time.

The size of the proposed hospital has been subject to lengthy discussions between the NHS Trust, their partners, the GLA and the Council to ensure that it would provide the required level and breadth of care services needed, whilst releasing part of the site to be redeveloped for residential use. The application is supported by a Needs Case Summary which concludes that the hospital is correctly sized to meet current and projected needs. In addition, and as a future proofing measure, a plot within the masterplan site (the surface car park) is allocated to allow expansion space should this ever be required. This could include development of new building(s) above a retained car park or in combination with a reduction in car parking space based on assessed demand.

Detailed - Phase 1A

New Hospital Building
The new hospital would comprise 79,604 sqm over eight storeys (plus basement) on the western extent of the hospital site. This would be an increase on the existing 57,539 sqm of ad hoc hospital buildings. The building would be substantial, with a proposed length of 156m, depth of 105m and height of 41.35m (excluding ventilation plant).

In terms of the internal configuration of the hospital, the basement floor is primarily a support floor with staff access, electrical plant rooms, supporting soft FM and logistics, the pharmacy, and catering departments. The ground floor is dominated by emergency services which occupies over three quarters of the floor plate. The remainder of the floor comprises a double volume main entrance area with supporting facilities, patient transfer services and security.

The main entrance to the building was moved to the north corner through the design process, this creates a more obvious and visible entry point to the hospital with good co-location to the multi-storey car park and the site entrance from Pield Heath Road. The support services and cafe/retail opportunities have been placed around the main entrance. The entrance to the emergency department is located to the south in a two storey height volume protruded towards the proposed central green spaces.

The Hospital building is proposed to include the following service areas across the multiple floors:
Adult Inpatients - 15,711.7 sqm
Ambulatory Care Services - 5,184.1 sqm
Childrens Unit - 3,317 sqm
Clinical Support - 1,848.8 sqm
Emergency - 9,278.5 sqm
Imaging - 2,977.3 sqm
Maternity Care - 7,283.8 sqm
Operating Theatres - 3,795 sqm
Other Support - 4,923.6 sqm
Therapies - 829.6 sqm
Comms - 10,280 sqm
MEP - 14,173.6 sqm
TOTAL - 79,604 sqm

Hospital Floor Stacking arrangement
The applicant advises that various clinical priorities informed the design development; most notably the configuration and size of the emergency floor, which needed to be co-located on a single level. In discussion with the clinical leads the hospital department stacking was tested and arranged to ensure key department co-locations and flows through the hospital

could be realised. During design development the scheme design was submitted to the National Hospital Programme (NHP) review team for input. The new building is proposed to be laid out as agreed with the NHP with services co-located to ensure efficiencies.

Massing of the Hospital Building
The massing has been concentrated as far into the site as the constraints of a single phase rebuild would allow. The building profile and silhouette is staggered and setbacks are used to provide both articulation and layering of the facade which is also addressed through the variety of complimentary materials used. The mass of the building is further articulated with a series of roof terraces and lightwells. At seventh floor, a clear height of 5m is provided to accommodate the plant room, Air Source Heat Pumps and ventilation towers are currently shown at level 8, which have been set back from the parapet to alleviate their visual impact.

The new hospital will be constructed from a palette of materials including brick, architectural concrete, glazing and metal. The west wing of the building, facing Royal Lane, has a unified brick facing. A series of brick clad pre-cast panels form a regular expressed facade grid providing visual interest, depth and animation. The full height windows will provide extensive views out and maximise natural daylight penetration. The east wing of the new hospital, which in future will face the main green park, includes a two storey brick facing podium, on top of which rests a four storey element covered with an architectural concrete facade.

Servicing
The new hospital will have a dedicated service yard south of the hospital building. Service vehicles accessing the service yard will enter the site via the Colham Green Road access. The servicing yard comprises HGV, hearse, fleet vehicles bays, clear turning area to facilitate HGV's entering, turning and leaving the servicing yard, twin generator compound and a waste compound.

Access - Car and Ambulance
In Phase 1A-B, most staff and patient/visitor car-based trips would arrive and depart via the Pield Heath Road Main Entrance junction. The Main Entrance will also provide a route for emergency ambulances, with an 'Ambulance Only' link within the site to access the ambulance yard. The Main Entrance junction will be amended to provide two lanes and the western Pield Heath Road arm will be widened to facilitate two-way traffic between the eastbound on-carriageway bus stop and the proposed westbound bus lane and bus stops.

A proportion of staff and patient/visitor car-based trips would arrive and depart via the Royal Lane MSCP Access junction. This secondary access has been provided to reduce congestion on the Pield Heath Road corridor and improve the operation of the Main Entrance junction on Pield Heath Road.

The junction will be a priority controlled T-junction with a zebra crossing on the MSCP access arm and is located approximately 30m to the south of the Pield Heath Road/Royal Lane min roundabout. Traffic can use this access to enter or exit the MSCP car park only which provides a convenient access for traffic travelling to/from the west. Delivery and servicing trips and patient/visitor car-based trips would arrive and depart via an upgraded Colham Green Road Entrance. The Colham Green Road Entrance would also provide a route for emergency ambulances to access the ambulance yard. The hospital access from Colham Green Road would be widened to facilitate HGV access to the existing hospital service yard (centrally located in the site) and access to the new hospital service yard.

MSCP
The proposals include a multi-storey carpark (MSCP) on the north-western edge of the site, overlooking the junction of Royal Lane and Pield Heath Road. The proposals seek to construct a five storey MSCP that is connected to the main hospital building via a link bridge. The building would have a width of 75m, a depth of 63m and a maximum height of 13.2m.

The facades of the MSCP are articulated through the alternation of opaque and perforated vertical slots. The opaque slots are made of red brick matching those used in the new hospital facades whereas the perforated slots present terracotta extrusions and architectural metal mesh. In the north, east and west facades the openings present a perforated metal cladding which allow the car park to be naturally ventilated and also provide shade from the sun.

The proposed number of car parking spaces at each level of the MSCP are:
Ground Floor - 98 (2 accessible)
First Floor - 152 (10 accessible)
Second Floor - 157 (10 accessible)
Third Floor - 157 (10 accessible)
Fourth Floor - 157 (10 accessible)
Roof - 60 (3 accessible)
Total - 781 (45 accessible)

Four car club bays would be provided in the multi-storey car park, which can be increased depending on future demand.

Mobility Hub
A 'mobility hub' is proposed within the MSCP. The 'mobility hub' would offer a range of connected transport modes supplemented with enhanced facilities and information features to both attract and benefit hospital visitors and patients. The hub would be located in the ground floor of the building that accommodates the MSCP, integrated with retail, operational space with ease of access to the adjacent spaces and footways. The hub would be in a prominent frontage location in close proximity to the Pield Heath Road bus stops, in order to minimise the short walk from bus to the main entrance of the building.

The mobility hub is proposed to offer the following components:
- enhanced public transport access
- live timetables and departure boards
- off-bus ticketing
- cycle hire, cycle parking and repair workshop
- car club spaces
- priority car share spaces
Plus EV charging spaces and accessible bays.

Cycling
The proposals include provision for 36 long-stay cycle parking spaces; and 56 short-stay cycle parking spaces. The secure long-stay cycle parking would be located on the ground floor of the MSCP, accessible from the northern side of the building. The access would be secured and accessible with either a key code or swipe card. Alongside parking, for those using the internal cycle storage areas dedicated lockers are proposed. Within the long-stay cycle parking area there will also be a small cycle workshop area with tools and equipment for cycle maintenance.

15 short-stay cycle parking would be provided in the form of 28 Sheffield Stands. It is proposed that 20 of the Sheffield Stands will be located at the western end of the Main Entrance Plaza. The remaining eight Sheffield Stands will be located east of the MSCP. The Brunel University/Santander cycle scheme is also proposed. The cycle docking station would be located east of the MSCP in proximity of the Main Entrance junction with Pield Heath Road.

Detailed - Phase 1B - Interim
As set out above, Phase 1B comprises the interim elements of the proposals which would be delivered alongside Phase 1A. As the hospital requires appropriate access and transport solutions to function, an interim solution is required until the remainder of the masterplan is able to be delivered following demolition of the old hospital. The main entrance would provide a route for emergency ambulances, with an 'Ambulance Only' link within the site to access the ambulance yard. The main entrance junction would be amended to provide two lanes on entry to an exit from the hospital site whilst the western Pield Heath Road arm would be widened to facilitate two-way traffic between the eastbound on-carriageway bus stop and the proposed westbound bus lane and bus stops. The Colham Green Road Entrance would also provide a route for emergency ambulances to access the ambulance yard. The hospital access from Colham Green Road would be widened to facilitate HGV access to the existing hospital service yard (centrally located in the site) and access to the new hospital service yard.

Detailed - Phase 1C
Phase 1C comprises the works which can only be developed following the clearance of the wider existing hospital. Phase 1C will divert buses from Pield Heath Road and Colham Green Road into the site, where they will stop at new bus stops located between the main hospital entrance and the A&E entrance. There will be two two-lane carriageways to the east of the A&E drop off loop, which will consist of a 3.8m wide bus lane and a 3.2m wide traffic lane. This arrangement has been provided so that the buses can stop without blocking traffic accessing the surface car park or ambulances accessing the Ambulance Yard.

Pedestrian priority crossings along the key desire lines are proposed so that pedestrians are given priority when entering or leaving the hospital. A new bus and ambulance gate would be provided to the south of the drop off loop access so that only TfL buses and ambulances can continue through the site. The main route for A&E ambulances will be via Colham Green Rd and the bus and ambulance gate will ensure this route is free of general traffic, such that there is no delay to buses or ambulances. The Colham Green Road site access junction would be upgraded further in Phase 2, owing to land that would become available once parking near the Colham Green Road access is vacated and cleared.

Phase 1C would also provide a surface car park which could accommodate 161 car parking spaces, and up to 14,000sqm of expansion space if ever required by the hospital. The Trust have submitted a robust needs case during the course of the pre-application process but as requested by the Council, additional space within the site is offered to be safeguarded for any future expansion needs.

Phase 1C also proposes a large area of central public open space (POS) for enjoyment of hospital patients, staff, visitors and the wider community. The POS comprises walkways to allow access for visitors through the site and facilitates an east - west connection. This area comprises 2,062sqm. The woodland area to the south of the hospital comprises 6,042sqm of green public open space which can also be utilised by patients, visitors and local residents.

Phase 2 (Outline)

The submitted Parameter Plans, are proposed to establish the key parameters and principles of the Outline Area of the Proposed Development. They set the maximum parameters, which have been assessed as part of this application to guide future master planning and the detailed design of future phases / zones. The purpose is to provide a level of design certainty about the quantum and quality that will be achieved. This is to enable sufficient flexibility to respond to future changes and constraints, however, also ensure that future development would be delivered in a consistent manner that can come forward comprehensively.

Height and Massing
The submitted Parameter Plan (Maximum Building Heights) illustrates the maximum building heights proposed across the Outline Area. The illustrative proposals for the Outline Area comprise three blocks (P01, P02 and P03) which vary in height between 3-8 storeys. The tallest 8 storey element is positioned in the centre of the site, where massing would be at the furthest point away from the existing residential properties.

Land Use Quantum
Based on the Illustrative Masterplan, the proposed three blocks (P01, P02 and P03), would have a combined maximum GIA of 40,046 square metres. The maximum GIA would be distributed by zone and block as:

Block PO1
Block Maximum GIA (Total) - 17,296 sqm
Maximum Residential GIA (maximum) - 13,819 sqm
Private Amenity Space (minimum) - 2,600 sqm
Storeys - Up to 8 storeys
Parking GIA - 13,063 sqm
Commercial GIA - 414 sqm

Block P02
Block Maximum GIA (Total) - 10,409 sqm
Maximum Residential GIA (maximum) - 7,816 sqm
Private Amenity Space (minimum) - 1,920 sqm
Storeys - Up to 6 storeys
Parking GIA - 7,816 sqm
Commercial GIA - 138 sqm

Block P03
Block Maximum GIA (Total) - 12,340 sqm
Maximum Residential GIA (maximum) - 9,868 sqm
Private Amenity Space (minimum) - 1,920 sqm
Storeys - Up to 7 storeys
Parking GIA - 9,868 sqm
Commercial GIA - 184 sqm

Total
Block Maximum GIA (Total) - 40,046 sqm (GIA)
Maximum Residential GIA (maximum) - 31,503 sqm (GIA)
Private Amenity Space (minimum) - 6,440 sqm (GEA)
Parking - 7,807 sqm (GIA)
Commercial GIA - 736 sqm (GIA)

The residential GIA floorspace of the outline component of the application is based on the submitted Illustrative Masterplan. This would allow the final residential GIA for each block based on the final unit mix in terms of size and tenure to be established as part of future Reserved Matters Applications. The unit mix for the Outline Area comprises a Maximum Parameter approach for the 327 residential units that could be delivered. An indication of what could be delivered through reserved matters is therefore 113 units in Block P01, 91 units in Block P02 and 85 units in Block P03.

The indicative Housing Mix and Tenure in the proposed development is:
1 bedroom - 57 market units and 37 affordable units (94 units total)
2 bedrooms - 66 market units and 52 affordable units (118 units total)
3 bedrooms - 41 market units and 74 affordable units (115 units total)

164 Market Units and 163 Affordable Units = 327 Units Total

Of the total residential floorspace, 15,751 square metres is proposed to be affordable housing floorspace equating to 163 units and 634 habitable rooms (54%).

Open Space and Landscaping
The wider masterplan includes open space and public realm in the form of public realm, children's play areas and communal podium gardens. This is in addition to private residential balconies. Amenity space across the Illustrative Masterplan (for the detailed and outline) can be categorised into three key types; public; communal (private). The public open space which is located in the centre of the site and woodland area to the south is not located within the outline (phase 2 boundary) but is located in the red line boundary of the application. This area will be publicly accessible for residents of the wider masterplan.

The submitted Parameter Plan (Proposed Open Space) establishes the extent and distribution of, open space, public realm and amenity space in the context of the proposed plots. The Illustrative Masterplan shows how this could be delivered across the masterplan

Public Open Space (comprising central open space and woodland area) - 8,104 sqm
Private Balconies, Terraces and Gardens - 1,310 sqm (indicative as part of future RMA)
Communal (Private) Amenity Space - 7,000 sqm (indicative as part of future RMA)
Children's Play Space - 2,438 sqm (indicative as part of future RMA)

Transport and Access
A new priority junction would provide access to Plots P01 and P02, both residential blocks. The internal access road will be a cul-de-sac, with onward access to the pedestrianised spine for service vehicles and emergency vehicles only.

Car Parking
A total of 302 car parking spaces are proposed, including disabled bays for "Blue Badge" holders. 40 spaces are to be provided on-street along the site perimeter. The provision of car parking within the Outline Component will be provided on the basis of a ratio of 0.89 spaces per residential unit. In accordance with the overarching car parking management plan for the Site, the exact number and location of these parking spaces would be determined through the detailed design development of the future RMAs on a phase by phase / block by block basis.

Cycle Parking
Cycle parking is proposed in accordance with London Plan (March 2021) standards. The number of cycle parking spaces will be subject to the final unit mix on a phase by phase /

block by block basis and in accordance with the indicative unit range mix (%). It will therefore be determined and confirmed through future RMAs, to include provision for the community spaces.

3.3 Relevant Planning History

4058/APP/2016/2693 Hillingdon Hospital Pield Heath Road Hillingdon

Application for a Non-Material Amendment to planning permission ref. 4058/APP/2015/1691 date 07/08/2015 (Extension to the Paedriatric Building to provide four bedrooms with associated support facilities and car parking spaces) to allow the re-siting of a path so as to be consistent with the revised siting of the air handling units (Application ref. 4058/APP/2016/1569 refers).

Decision: 15-09-2016 Approved

4058/APP/2016/2744 Hillingdon Hospital Pield Heath Road Hillingdon

Re-siting of a rooftop 0.6m diameter telecommunications dish from a free standing pole to a tripo pole.

Decision: 26-09-2016 Approved

4058/APP/2016/4294 Hillingdon Hospital Pield Heath Road Hillingdon

Replacement and relocation of generator within maternity section to an external location

Decision: 17-02-2017 Approved

4058/APP/2017/2127 Hillingdon Hospital Pield Heath Road Hillingdon

Installation of a 5m tall x 114mm diameter steel pole on a free standing support frame to accommodate 4 x 600mm dishes, control cabinet (600mm x 600mm x 600mm) and associated cabling on the upper roof level

Decision: 30-08-2017 Approved

4058/APP/2018/1055 Hillingdon Hospital Pield Heath Road Hillingdon

Single storey extension to to the Accident and Emergency Department to create an Urgent Care Centre

Decision: 31-05-2018 Approved

4058/APP/2018/2608 Hillingdon Hospital Pield Heath Road Hillingdon

Installation of a docking station for 10 bikes

Decision: 12-09-2018 Approved

4058/APP/2018/4018 Riverside Centre, Hillingdon Hospital Pield Heath Road Hillingdon

Section 73 (Minor Material Amendment) to planning permission ref: 4058/APP/2018/1055 dated 31-05-2018 for a single storey extension to the Accident and Emergency Department, namely alterations to the design and footprint of the extension to include a new ramp.

Decision: 15-03-2019 Approved

4058/APP/2018/4114 Hillingdon Hospital Pield Heath Road Hillingdon

Formation of three parking spaces and a turning head for three ambulances or hospital vehicles

Decision: 17-01-2019 Refused

4058/APP/2019/1452 Hillingdon Hospital Pield Heath Road Hillingdon

Addition of external louvres and proposed external flue to be attached onto the existing main chimney

Decision: 02-07-2019 Approved

4058/APP/2019/3286 Hillingdon Hospital Pield Heath Road Hillingdon

Erection of a temporary single storey prefabricated system building, together with a link to the AMU building, with a total floor area of 888 sq.m, to provide for a 28 bed space decant and winte overspill ward, including 4 parking spaces; demolition of Building 17 and the creation of 30 replacement staff car parking spaces; reconfiguration of the parking area to the east of the Womens' Services Building resulting in a net provision of 11 replacement visitor parking spaces (amended scheme).

Decision: 04-03-2020 Approved

4058/APP/2019/737 Hillingdon Hospital Pield Heath Road Hillingdon

Formation of four ambulance/hospital vehicle parking spaces, installation of a ramp and installation of new doors serving the patient waiting area

Decision: 29-04-2019 Approved

4058/APP/2020/1003 Hillingdon Hospital Pield Heath Road Hillingdon

Construction of a new 90-bed three-storey ward building (Ward Building South); an additional tw storeys to be constructed on the site of the ground-floor 28-bed Decant Ward Building (Ward Building North) and the provision of 117 replacement car parking spaces, involving the demolitio of the existing Paediatric building and relocation of the existing waste compound and its associated parking.

Decision: 07-05-2020 Approved

4058/APP/2020/1292 Hillingdon Hospital Pield Heath Road Hillingdon

Construction of a single storey bereavement building serving the Maternity building.

Decision: 01-07-2020 Approved

4058/APP/2020/2213 Hillingdon Hospital Pield Heath Road Hillingdon

Installation of a permanent containerised low voltage diesel driven standby generator, together

with associated fuel tank and boundary fencing, together with installation of a small steel enclosure adjacent the existing Generator No1.

Decision: 12-10-2020 Approved

4058/APP/2020/2923 Hillingdon Hospital Pield Heath Road Hillingdon

Installation of generator, tank and enclosure, involving demolition of existing generator building

Decision: 09-11-2020 Approved

4058/APP/2021/2563 Hillingdon Hospital Pield Heath Road Hillingdon

Variation of Condition 2 of planning permission ref: 4058/APP/2020/2213 dated 12/10/2020 (Installation of a permanent containerised low voltage diesel driven standby generator, together with associated fuel tank and boundary fencing, together with installation of a small steel enclosure adjacent the existing Generator No1) to allow for the omission of a section of hedge tc be replaced by a hit and miss timber fence along Pield Heath Road (S73 minor material amendment application)

Decision: 20-09-2021 Approved

4058/APP/2021/3650 The Furze Hillingdon Hospital Pield Heath Road Hillingdon

External air conditioning plant to be enclosed within a timber plant enclosure, replacement of external ramp, repair and restoration of all windows throughout and installation of secondary glazing and replacement of damaged windows and doors, repointing of existing brickwork to be repointing where damaged and repainting to match existing, replacement of existing round rooflight like for like. Internal reconfiguration comprising the installation of demountable partition walls, removal of partition walls, replacement of non-original doors with fire doors.

Decision: 09-09-2022 Approved

4058/APP/2021/3691 Hillingdon Hospital Pield Heath Road Hillingdon

Section 73 application to vary Condition 2 (Approved Plans) of application reference 4058/APP/2020/1003 (Construction of a new 90-bed three-storey ward building (Ward Building South); an additional two storeys to be constructed on the site of the ground-floor 28-bed Decant Ward Building (Ward Building North) and the provision of 117 replacement car parking spaces, involving the demolition of the existing Paediatric building and relocation of the existing waste compound and its associated parking) to amend the elevations of Ward Building South.

Decision: 11-07-2022 Approved

4058/APP/2021/421 Hillingdon Hospital Pield Heath Road Hillingdon

Installation of a single storey building for retail use (Use Class E(a))

Decision: 29-03-2021 Approved

4058/APP/2022/671 Hillingdon Hospital Pield Heath Road Hillingdon

Demolition of the following buildings within the grounds of Hillingdon Hospital: Busy Bees, Alderborne Unit, Elderly Day Hospital, Beaconsfield, Adult Audiology, Quebec Ward, Pinewood Ward, Osterley Ward, Churchill Ward, Middlesex Ward, Lister Ward, Pagett Ward Diabeticare Ward, Greenacres, Postgraduate Medical Centre, HV Plant Room, Annex Corridor and Partial Canteen (Prior Notification under Schedule 2, Part 11, Class B The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)).

Decision: 07-04-2022 Approved

Comment on Relevant Planning History

The application site has a long planning history related to its health service use. This includes numerous recent ad-hoc applications for temporary buildings to provide scope for the medical services required at the site.

Application ref. 4058/APP/2022/671 was granted consent on 07/04/22 for 'Demolition of the following buildings within the grounds of Hillingdon Hospital: Busy Bees, Alderborne Unit, Elderly Day Hospital, Beaconsfield, Adult Audiology, Quebec Ward, Pinewood Ward, Osterley Ward, Churchill Ward, Middlesex Ward, Lister Ward, Pagett Ward Diabeticare Ward, Greenacres, Postgraduate Medical Centre, HV Plant Room, Annex Corridor and Partial Canteen (Prior Notification under Schedule 2, Part 11, Class B The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)).

The current application seeks to provide a sitewide masterplan for the site rather than the piecemeal development of the past. In order for the development of the new Hospital building and MSCP to progress it is necessary to demolish the existing buildings in the western part of the site. One of these buildings is the Busy Bees nursery. In order to re-provide a nursery service on the site a new nursery is proposed under application reference 76613/APP/2022/37 'Demolition of existing modular building and erection of new two storey building for use as a nursery (Use Class E), with external play space, ramped access, external plant, car parking, cycle parking, refuse and buggy storage.'

Consent was granted for two modular buildings in the centre of the Hillingdon Hospital Site known as "Modular Ward North and Modular Ward South". These wards were urgently required as part of the decanting strategy for the redevelopment of the Hospital. The Trust require the additional floorspace to assist the decant process and provide clinical and medical support space.

Application ref: 4058/APP/2020/1003 was submitted for additional ward accommodation to replace non-compliant ward accommodation within the 1960's tower block, and elsewhere on the Hillingdon Hospital site. This was granted on the 7th May 2020. A previous planning application (ref. 4058/APP/2019/3286) for a 28 bed decant ward and winter overspill ward building was approved on the 4th March 2020.

In 2014, planning permission ref: 4058/APP/2013/99 was granted for the Acute Medical Unit Building. The officers report for this application acknowledged that the existing hospital site suffered from a long history of ad-hoc and piecemeal re-development that resulted in the existing site having poor way-finding; excess expanse and a visual dominance of surface car parking on site; a frequent lack of attractive landscaping associated with individual hospital buildings and a deficit of green open space on the site.

The s106 legal agreement attached to consent reference 4058/APP/2013/99 stated that no planning application that involves "additional internal floorspace of greater than 250sqm being created" shall be submitted prior to "the Council's written approval of an over-arching masterplan demonstrating how the Hospital as a whole will be redeveloped in a phased, coherent, sustainable strategic and comprehensive manner (the Strategic Masterplan)".

The s106 legal agreement stated that the strategic masterplan should include the following supporting documents; flood risk and drainage strategy, energy strategy, improvements to way finding, improved accessibility, highways and a site car parking review, landscaping strategy, and heritage strategy.

This hybrid planning application addresses this requirement for a strategic masterplan for the site.

There is current application for a new nursery building within the wider hospital site under application reference 76613/APP/2022/37 for 'Demolition of existing modular building and erection of new two storey building for use as a nursery (Use Class E), with external play space, ramped access, external plant, car parking, cycle parking, refuse and buggy storage'.

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 National Planning Policy Framework (NPPF) (2021) is also 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.BE1	(2012) Built Environment
PT1.CI1	(2012) Community Infrastructure Provision
PT1.CI2	(2012) Leisure and Recreation
PT1.CI3	(2012) Culture
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM4	(2012) Open Space and Informal Recreation

PT1.EM5	(2012) Sport and Leisure
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.H1	(2012) Housing Growth
PT1.H2	(2012) Affordable Housing
PT1.HE1	(2012) Heritage
PT1.T2	(2012) Public Transport Interchanges

Part 2 Policies:

DMAV 1	Safe Operation of Airports
DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 2	New Community Infrastructure
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
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 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 6	Development in Green Edge Locations
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
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMT 7	Freight
EM6	(2012) Flood Risk Management
LPP D10	(2021) Basement development
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 D2	(2021) Infrastructure requirements for sustainable densities
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 D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E1	(2021) Offices
LPP E11	(2021) Skills and opportunities for all
LPP G1	(2021) Green infrastructure
LPP G4	(2021) Open space
LPP G5	(2021) Urban greening

LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP G9	(2021) Geodiversity
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG3	(2021) Creating a healthy city
LPP GG4	(2021) Delivering the homes Londoners needs
LPP GG6	(2021) Increasing efficiency and resilience
LPP H1	(2021) Increasing housing supply
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 HC1	(2021) Heritage conservation and growth
LPP HC3	(2021) Strategic and Local Views
LPP HC6	(2021) Supporting the night-time economy
LPP S1	(2021) Developing London's social infrastructure
LPP S2	(2021) Health and social care facilities
LPP S3	(2021) Education and childcare facilities
LPP S4	(2021) Play and informal recreation
LPP S5	(2021) Sports and recreation facilities
LPP SD10	(2021) Strategic and local regeneration
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI5	(2021) Water infrastructure
LPP SI6	(2021) Digital connectivity infrastructure
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 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
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
LPP T8	(2021) Aviation
LPP T9	(2021) Funding transport infrastructure through planning
NPPF	National Planning Policy Framework 2021

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **20th July 2022**

5.2 Site Notice Expiry Date:- **20th July 2022**

6. Consultations

External Consultees

Due to the scale and significance of the proposed scheme consultation letters were sent to 3913 local owner/occupiers and residents associations on 21/06/22. The surrounding London Boroughs of Ealing, Harrow and Hounslow, plus the wider District and County Councils were also consulted, along with a wide range of health groups, charities, schools, Uxbridge College and Brunel University. The application was also advertised in the press and multiple site notices were also posted around the application site. 24 letters/comments have been received that can be summarised as:

8 objections:
- concern that services will be maintained during construction
- overdevelopment of the hospital site
- insufficient residential parking/increased parking stress
- overlooking
- sewage cannot cope
- overshadowing
- loss of outlook/light
- loss of privacy
- increased noise/light and air pollution
- traffic congestion
- area should be residents parking only
- not enough consultation
- provision for education is inadequate/space for staff
- will it meet the increasing demand of a growing population
- is the location suitable given difficulty of access
- no more housing
- building too high
- too close to residential
- landscaping will not be as tall as the building
- impact on phone reception
- no more masts
- hospital is smaller than existing hospital
- will new the residents be treated at Mount Vernon
- clinical rooms are small
- where are bus stops

10 in support:
- big improvement
- asset to the area
- new plans look amazing and cannot wait to see it develop over the next 5-6yrs.
- making excellent use of the land
- introducing wildlife and green spaces
- current hospital needs replacing/outdated
- will provide healthcare for Hillingdon Residents for the next 60yrs
- new build for an ageing hospital
- long overdue
- current condition not effective or efficient for the delivery of patient care
- fit for purpose A&E
- more beds
- need proposed services locally
- parking available to patients, relatives and staff
- will vastly improve efficiency and safety and bring us out of the dark ages
- important and essential investment
- parts of old hospital not safe
- new 'Bus Connectivity' route will be very welcome
- strongly support
- need to protect pied wagtails

6 comments are deemed neutral as they note positives and negatives:
- excellent idea, but no social housing, staff accommodation needed near hospital to ensure better work place quality
- need to consider the growing needs of the community, but will residents have the services needed during construction
- state of the art equipment that would benefit the community
- better local facilities
- unaffordable residential has detrimental impact on family life, access, environment, schools, health facilities
- area already busy with traffic
- air pollution
- hospital not more accommodation
- new hospital needed
- disagree with ward layout
- more beds needed
- not enough office space
- maternity should be separate building
- impact on TV
- too many masts at present
- construction vehicles could damage phone lines
- workers should not be allowed to park within 1 mile of site
- no road closures or traffic management in the local area
- include integrated biodiversity measures to achieve net biodiversity gain
- too high
- too close to residential

NORTH UXBRIDGE RESIDENTS ASSOCIATION
This is a comprehensive and impressive Application. It embodies the concepts on which consultation has taken place.

However, the 'Bus Connectivity' is new and very welcome to us with buses routed through the site, with stops at the main entrance of the new Hospital building. The Committee felt this could work

satisfactorily, but would only be viable with junction improvements, especially to enable U4 buses heading for Hayes to navigate the Colham Green Road/Pield Heath Road roundabout.

Some concerns were raised about pollution from buses running so close to the Main Entrance, but it is assumed that only hydrogen or electrically-powered buses pass through the site.

The scale and visual appearance of the envisaged building mass and evolving range of hospital facilities were well outside our lay opinion, and obviously need specialist design opinion.

As regards the non-hospital part of the hybrid Application, concerns were raised about the extent of potential land being released for disposal. The Committee noted that some of the land is being reserved for future health needs, but that a large proportion of this area is proposed for potentially 327 units housing development. It was felt that a greater area of land should be reserved for future hospital needs, critically for staff accommodation.

GREATER LONDON AUTHORITY
The GLA Stage 1 report has the following conclusions:

London Plan policies on housing, affordable housing, social infrastructure, heritage, urban design, sustainable development, environmental issues and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- Land Use Principles: The principle of redeveloping the site to provide a modern Hospital, and MSCP co-located with new housing through consolidation and the optimisation of land use is strongly supported in strategic planning terms. Further justification, however, should be provided for the level of car parking proposed for the MSCP.

- Affordable housing: 54% by habitable room, comprising 70% social/affordable rent and 30% intermediate and would qualify for the FTR, subject to the applicant demonstrating engagement with a registered provider, consideration of grant funding and meeting other policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant. An early-stage review must be secured.

- Heritage and urban design: The approach to design is broadly supported and no harm would be caused to nearby heritage assets. The acceptability of the proposed tall buildings will be determined once the outstanding matters relating to impacts have been satisfactorily addressed.

- Transport: Further information on bus movement through the site is required; submission of a robust justification of the hospital parking in line with Policy T6; amendments to the design of the cycle parking; further improvements to the walking and cycling environment; and various transport-related plans appropriately secured.

- Sustainable development and Environmental issues: Additional information on the energy strategy, WLC assessment, water and biodiversity as detailed in the technical memos provided to the applicant; and post-construction monitoring and a carbon off-set contribution are also to be secured.

TRANSPORT FOR LONDON
I write to provide detailed strategic transport comments on the above application. These provide more detail on the matters raised in the GLA Stage 1 Planning Report, dated 11 August 2022. Please note that these are additional
also to any response you may have received from my colleagues in safeguarding, infrastructure or asset protection and from TfL as a party with a property interest.

Site Location
The application site comprises the existing Hillingdon Hospital site, bounded by Pield Heath Road to its north, Colham Lane to its east and Royal Lane to its west. These roads are part of the local road network, which falls within the highway jurisdiction of Hillingdon Council. The nearest parts of the TLRN are A40 and A312 (The Parkway), at approximately 3kms and 5kms to the north and south of the site respectively. The M4 and M25 motorways runs to the north and west of the site and can be accessed via M4 Junction 4, at approximately 3.5kms to the south of the site.

The site is served by 6 bus routes operating along Pield Heath Road, with the nearest stops near the main entrance in Pield Heath Road. There are no rail stations within walkable distance of the site, however the bus routes servicing the site provides connections to West Drayton, Uxbridge and Hayes & Harlington and Hillingdon stations. The PTAL is 3 along Pield Heath Road and Colham but this reduces to 2 towards the interior of the site. The predominant PTAL is taken as 3, on a scale from 0 to 6b, with 6b being the highest.

Healthy Streets
All developments are expected to deliver against the Mayor's Healthy Streets approach in line with Policy T2. An Active Travel Zone (ATZ) assessment has been undertaken, with several recommendations made to improve the active travel environment to key trip attractors. Noting the shift nature of the hospital workers, the applicant should undertake a night-time assessment of the routes to key trip attractors. To support achieving a strategic modal shift, a proportionate contribution towards delivering the improvements identified within the current and night-time ATZ assessment should be secured within the S106.

It is also noted that the applicant has undertaken a Healthy Streets Check for four different segments along the site boundary. The Healthy Streets Check for Phase 1b identifies that three of the four segments have zero scores - 4 for segment 2, and 2 for segment 3 and 4. During Phase 2, it is only segment 2 which has zero scores, although this does remain as 4. In line with TfL guidance, the applicant should identify the measures that will be implemented to remove the 0 scores. If it is not possible that these '0' scores cannot be removed, it will need to be robustly justified.

Site Connections and permeability
The redevelopment of the site provides the opportunity to make connections, prioritising and enabling more direct trips for walking and cycling and reducing the reliance on the surrounding roads. Whilst it is acknowledged that there are constraints due to the working hospital environment, it is considered that more could have been done to enhance the permeability of this site, as highlighted through pre-application discussions.

The applicant is proposing a number of improvements to the pedestrian environment within and adjoining the site. Whilst the principle of improving the pedestrian environment is welcomed, further thought is needed on some of the proposals to ensure that a high quality, safe and attractive pedestrian environment for all is being created, in line with the Mayor's

Vision Zero and Healthy Streets approach
A walking and cycling connection to Apple Tree Avenue has been provided. Whilst the connection is welcomed, no detail has been provided on the character or dimensions of this link, and insufficient consideration has been given to the pedestrian environment linking to this within the site. The route to the main hospital entrance also appears to be indirect.
Further thought to the connections west to Royal Lane is also required, with particular regard to cycle access.

Hospital boulevard
Whilst it is understood that Hospital boulevard needs to be functional, it is considered that this is a missed opportunity in terms of providing a good quality walking and cycling environment, in line with

Policy T2. For example, the space taken in providing a central median could have been better allocated to pedestrians or cycles, and all the crossings are staggered, which is not ideal for a legible, accessible pedestrian environment. It is considered that amendments to the design of this road and footway could assist in addressing this.

It should also be ensured that the route between Pield Heath Road, and the bus stops located on it, and the main hospital entrance is of a high-quality and attractive at all times of the day. This will be a particularly important route during the earlier phases of the development. It is considered that the applicant should relook at this route, with a view of implementing design measures to improve the pedestrian experience and support creating an attractive, comfortable and all-inclusive environment.

Pedestrian Environment
New crossings to the west and south of the Pield Heath Road / Royal Lane mini-roundabout are welcome, but this leaves the junction without controlled pedestrian crossing facilities on the eastern and northern arms. The addition of tactile paving to the informal crossing on the eastern arm adds a safety risk as this is not a safe crossing-point and indicating to visually impaired pedestrians that it is puts them at unacceptable risk.

The provision of an eastern footway and a controlled crossing at the northern end of Colham Green Road is welcome. However, this leaves the eastern and western arms of the Pield Heath Road / Colham Green Road junction without safe crossing facilities.

The design of various junctions around the site boundary represents a poor and potentially unsafe environment for pedestrians, with unnecessarily wide junction mouths and pedestrians diverted well away from their desire lines. The proposed phase 1b Colham Green Road access is one such example, as is the phase 2 Pield Heath Road residential access junction. No explanation has been provided by the applicant as to why the junction radius needs to be as high as 8 metres, or why the carriageway needs to be 6 metres wide. As a minimum requirement, TfL expect Manual for Streets guidance to be applied to street design.

A new mini-roundabout is proposed within the site, with informal pedestrian crossing facilities only on three arms, as seen in figure 4.40 'Phase 2 internal access arrangements from Colham Green Road access' and Appendix Highway Layout drawings - Phase 2, Tracking Sheet 2, of the Transport Assessment. This is unacceptable from a pedestrian safety and comfort perspective.

The above matters should be addressed prior to the determination of this application. It must be ensured that a high quality, comfortable and safe pedestrian environment is delivered, in line with London Plan policies, the Mayor's Healthy Streets approach and the Mayor's Vision Zero approach.

Cycling Environment
Within the submitted material, the applicant has provided only one diagram (Design and Access Statement, page 57) showing a cycle network proposal, or cyclable spaces within and beyond the site. This diagram clearly illustrates the lack of a joined-up network, even on completion on Phase 2. It also does not provide a convincing case for how the aspirations of the London Plan and the MTS for promoting cycling will be achieved.

The two most significant schemes for promoting cycling - the frontage route on Pield Heath Road and the internal cycle route - both fall within Phase 2 of the development. This means that access to and through the site by cycle will remain poor until Phase 2 is completed. Furthermore, following their completion it is not clear how a seamless connection to the wider cycling network will be created.

It is considered that the cycle route along the Pield Heath Road will be limited in its benefits for cycling and is detrimental to pedestrian comfort. Although shared use is a pragmatic solution to

getting cycles through this area, it does not meet the level of service expected for cycle infrastructure as identified in LCDS and Cycle Route Quality Criteria. The preference would be for opportunities to introduce east-west cycle movement through the site as part of the redevelopment. Furthermore, it is not clear how the frontage route connects to at either end. From the information provided, it appears to terminate at the proposed new crossing of Colham Green Road, but the onward movement for cyclists is not shown. It is assumed that cyclists are supposed to join Colham Green Road, as such this route only provides for those connecting between Pield Heath Road and Colham Green Road. There is no proposal for how the frontage route meets the internal access road between plots P01 and P02. In line with the Mayor's Healthy Streets approach cycles and pedestrians should have priority over the small number of vehicles using this access.

No information has been provided on the Phase 2 internal cycle route, so the potential benefits of this cannot be assessed at this time. Further information on this matter is required.

As highlighted in the Mayor's Stage 1 report, there is also concerns for cycle safety and connectivity in other locations. These concerns can be summarised as:
· Hospital Boulevard - this has no proposed cycle facilities, but it will need to be used by cycles in Phase 1 and forms an important connection between the internal cycle route and Pield Heath Road route.
· Pield Heath Road/Royal Lane mini-roundabout - the frontage route does not extend this far west and there are no cycle facilities on the other arms. As identified in Chapter 5 of the London Cycling Design Standards, mini-roundabouts represent a poor level of provision for cycling
· Pield Heath Road/Colham Green Road mini-roundabout - there is no provision for cycles in Phase 1, nor is there any consideration of cycle moving east-west in Phase 2. There is no connection to Colham Road, which has a modal filter at its junction with Pield Heath Road, which would be difficult to access under the Phase 2 proposals

The applicant should seek to address the above concerns prior to the determination of this application.

Although cycle connections immediately around the site are missing or sub-optimal, the commitment of section 106 contributions towards upgrading cycle facilities in the wider area is welcome. However, it is not clear whether these contributions will cover all the enhancements set out in the submitted Transport Assessment (TA), nor is it clear whether the enhancements have been agreed by the Council.

Wayfinding
A contribution towards wayfinding should be secured for this site. It should be ensured that the wayfinding signs are appropriate located to encourage sustainable and active between the site and key trip attractors. Noting that it has suggested that most of the users of the proposed hospital will be in their 70s or older, it is recommended that the applicant use dementia friendly signage. There should be a consistency in appearance of the signage, and careful consideration should be given to their location and grouping with the view of avoiding visual clutter. Consideration should also be given to providing signs which also incorporate Braille and tactile format.

Mobility Hub
A mobility hub is to be provided, located on the ground floor of the MSCP. Further thought should be given to the location of the mobility hub to ensure that it is best sited to support sustainable and active travel. Further detail on the mobility hub, including but not limited to its operational hours, should be provided.

Cycle Parking
336 long-stay and 56 short-stay cycle parking is provided for the hospital, which accords with the minimum standards identified in Policy T5 of the London Plan.

The applicant has identified that all the long-stay cycle parking will take the form of two-tier racks. As identified within London Cycle Design Standards (LCDS), at least 5 per cent of cycle parking spaces should be suitable to accommodate larger and adapted cycles. This is currently not being provided. To add to this, LCDS is clear that two-tier stands are not suitable for everyone and should be used in conjunction with more accessible (I.e. Sheffield) stands. It is therefore recommended that an appropriate proportion of stands take the form of Sheffield stands at standard spacing (1.2m preferred, 1.0m minimum).

The applicant should confirm that access to long-stay cycle parking provision will be 24 hours. Detail should also be provided on the security measures that will be implemented to ensure user safety at all times. It should also be ensured that there is sufficient level of lightings and level of natural surveillance after dark.

The applicant has indicated that they will be provided e-bike charging pillars which will cover 10 per cent of all bike parking. The provision is welcomed, and it is recommended that the Parking Design Management Plan contains a review mechanism which ensure that additional charging pillars are provided should demand arise.

The residential element of the scheme forms part of the outline element, as such any permission for this site should include a condition which secures cycle parking in line with the minimum standards identified in Policy T5. The condition should also seek to ensure that cycle parking design follows LCDS guidance.

It is noted that the current cycle scheme will be maintained, with the docking station to be located to the east of the MSCP. The Council should seek to secure a contribution towards a cycle hire scheme from this development.

Car Parking
Whilst the provision of 942 car parking spaces (781 in MSCP and 161 in a surface car park) represents a reduction in the current car parking associated with the hospital, all car parking should be robustly justified. The parking accumulation study undertaken to inform the proposed quantum includes a number assumptions, but it is not clear whether this includes the change in travel patterns as a result of implementation of the travel plan or whether it is using data based in London where a large proportion of people do not have access to a car. Clarity should be provided. The quantum of car parking at hospital should seek to support a shift towards sustainable and active travel, in line with Policy T1, and reflect the applicant's commitment to sustainable transport and net zero targets, specifically modal shift ambitions which align with the targets proposed in the Travel Plan.

A Parking Design and Management Plan (PDMP) must be secured through the appropriate mechanism. This should include detail on how parking spaces at this site will be managed, including how parking charges for hospital parking will be reviewed, and car parking spaces reduced and repurposed to support achieving a strategic modal shift and the targets contained within the Travel Plan.

Of the 942 parking spaces, 56 will be disabled person parking spaces. This is equivalent to 6 per cent which is in line with Policy T6.1. 4 per cent of car parking spaces for the hospital should be enlarged bays. 20 per cent of the staff parking and 12 per cent of patient parking will have Electric Vehicle Charging Provision (EVCP). This is welcomed. At least 20 per cent of the car parking provided for the residential element should have active EVCP provision, with passive provision for all remaining spaces.

The four car club spaces that are proposed to be provided in the mobility hub should have active electric vehicle charging provision in line with London Plan Policy T6.

Ten parking spaces have been identified for the nursery. No detail has been provided on how this quantum was arrived at, and this should be provided. It is also considered that further thought on the location of any car park, and the routes between it and the facility is required. As currently presented, the car parking for the nursery appears to be some distance from the nursery.

Due to the residential element of the scheme forming part of the outline element, full details of the parking provision have not been provided. The application should be re-evaluated against current policy at the time of the detailed planning application, with this requirement secured through the appropriate mechanism.

Access
A number of improvements to junctions that is used to access the site is proposed. Detailed design of junctions, particularly those which buses will pass through, should be provided to TfL for review to ensure that any modifications support safe and efficient bus movement, in line with Policy T3. Furthermore, in line with the Mayor's Healthy Streets approach, as referred to in Policy T2, any changes to the proposed junctions should seek to prioritise sustainable and active travel over that of vehicular movement. A Stage 1 Road Safety Audit should be undertaken for any changes proposed to the highway.

It is noted that there are two vehicle access points proposed for the multi-storey car park, one from hospital boulevard and another from Royal Lane. It is not quite clear why two access points are needed. It would be useful to understand whether any consideration was given to just having one access point to the car park. The removal of a vehicle access, such as that from Hospital Boulevard, can assist in creating a high-quality pedestrian environment to the hospital entrance through removing the requirement for pedestrians to cross paths with vehicles accessing the MSCP.

Impact
A multi-modal trip generation assessment has been provided to support this planning application. Noting that the site is supporting the introduction of bus services into the site, a contribution towards bus service enhancements is not sought in this instance.

Traffic modelling has been undertaken and is currently being validated. Once this process has been completed, further comments on this matter will follow. Design measures and/or financial contributions may be required to address any concerns raised in the modelling, in line with Policy T4.

Public Transport
As part of Phase 1b, a corridor widening scheme will be delivered around the existing bus stops on Pield Heath Road to enable two-way traffic flow between stopped buses. Updated swept path analysis which tracks a 12m bus should be provided to TfL for review, with further comments following on this matter upon receipt. Furthermore, it must be ensured that the routes from the bus stop to the hospital entrance during this phase is of a high-quality, suitable for pedestrians from all walks and life and attractive at all times as previously mentioned, and that the bus stop infrastructure is also a high-quality with contributions secured towards improvements as necessary.

It is welcomed that the proposed development includes a bus diversion into the site as part of Phase 1c works and will be operational during Phase 2. The diversion of a bus route into the site will increase the PTAL in several areas, supporting the sites intensification, and will contribute positively towards addressing existing and future health inequalities.

As part of this diversion changes to the internal highway layout, junction modifications and the provision of bus infrastructure is proposed. Swept path analysis should be provided of the bus movements. TfL Engineering and the Bus Infrastructure team will need to carry out a technical

review of the design and the bus tracking to confirm that they meet bus requirements and the prevailing TfL standards. The applicant will also need to demonstrate that buses can circumnavigate the realigned mini roundabout from both directions. Further detail is also sought on the bus stop sizes.

As highlighted above, TfL will need to review any design changes to junctions in which buses will pass through. Clarity should also be provided on the ownership of the roads in which buses will operate along to inform the appropriate wording for the S106 agreement and any necessary lease agreements.

Construction Logistics Plan
To support the application the applicant has submitted a Demolition and Construction Management Plan (DCMP) In line with Policy T7, a Construction Logistics Plan (CLP) should be secured through condition. This CLP should be phased to take into account the phased nature of the development. Detail should also be provided on how the construction of each phase will not impact on bus operations and the continued operation of the hospital.
The applicant has indicated that as part of the works to facilitate access to the site, temporary suspension to bus stops, footways and crossing diversions may be required. Any temporary suspension of the bus stop must be agreed with TfL. It is recommended that further discussion with TfL buses on the construction methodology of this site is undertaken.

No detail on the estimated number of vehicle movements associated with the construction of each phase has been provided. It is also not clear what routing the applicant is proposing to use during the construction process. Clarity should be provided.

It is noted that the applicant has identified that a Delivery Management System (DMS) will be implemented, which is welcomed. A stronger commitment to FORS and Direct Vision standard is sought.

It is noted, and welcomed, that the applicant has stated that there will be no parking provided for construction workforce on site and that workers will be encouraged to use modes of sustainable transport to access the site. The applicant should seek to provide appropriate facilities, such as but not limited to cycle parking and lockers, to encourage their workforce to use modes of active travel to and from this site.

Delivery and Servicing Plan
It is estimated that the proposed development will generate 194 delivery and servicing trips per day, the majority of which is linked to the hospital. Part of the route to the delivery and servicing yard for this hospital is also used by ambulances, as such it is considered that vehicular activity will be considerable. It would also be useful to understand how movement of all users can be safely and comfortably accommodated, and what design measures have been implemented to support this.

The new hospital will have a dedicated service yard, accessed via Colham Green Road. The Colham Green Road junction will be upgraded to support this activity. This junction also services as a pedestrians and cyclists, as such in line with the Mayors Healthy Streets approach, any improvements should seek to prioritise pedestrian and cyclists movement over that of vehicular. An inset loading bay is to provided on the main access route to serve the retail unit that is to be located on the ground floor of the loading.

Delivery and servicing for the residential element will be from the internal access road, passing through The Plaza to exit the site. Whilst it is noted that the Plaza will only be accessible for deliveries, servicing and emergency vehicles, it must be ensured that appropriate design and management measures are put in place to ensure that there is no conflict between different modes.

A full Delivery and Servicing Plan for all uses at this site should be secured through condition, in line with Policy T7. The DSP should contain detail on the measures that will be implemented to mitigate demand on the surrounding transport network. TfL will also expect the DSP to contain detail on how this activity will not impact on bus movement through the site.

Travel Plan
A framework residential and hospital travel plan has been submitted to support this application.

The targets contained within the Travel Plan should seek to align with the Mayor's strategic mode shift target. The targets contained within the Travel Plan for the hospital do not currently align with the strategic mode shift target, and should be revised. For example, it has been identified that the target for reducing car drivers is to the site is only 2 per cent, and an increase in bus users by only 1 per cent. Additional measures should be identified to support achieving the more ambitious targets. As highlighted above, a Parking Review mechanism should be secured to support achieving a strategic modal shift at this site.

It is noted that there are no targets identified within the framework residential travel plan, with the application stating that 'the specification of targets will need to be reserved for agreement with LBH once the final details of residential proposals are known'. The targets contained within the Travel Plans should align with the Mayor's strategic mode shift target.

A full travel Plan should be secured through condition for each land uses coming forward. A requirement to monitor car parking usage should also be incorporated into the Travel Plans. It should also be ensured that all travel plans also include a requirement to identify additional measures should targets not be achieved.

Contributions/Mayoral CIL
The residential element of the development will be liable to Mayoral Community Infrastructure Levy 2 (MCIL2) which came into force on 1st April 2019, as well as borough CIL. The MCIL2 rate for the London Borough of Hillingdon is £60 per square metre of floorspace. The applicant should ensure they are fully aware of the regulations.

In summary:
- It is welcomed that the proposed development includes a bus diversion into the site, however further information on bus movement is required to enable TfL to do a technical assessment of the proposals;
- Robust justification for the quantum of car parking for this hospital should be provided in line with Policy T6;
- Further detail should be provided on the junction modifications proposed;
- Changes to the design of cycle parking is required to address the above concerns, and further thought is needed in regards to the location of the Mobility Hub;
- Further comments will follow on the highway modelling for this application;
- A Delivery and Servicing Plan, Construction Logistics Plan and Travel Plan should be secured through the appropriate mechanism

Case Officer's comments:
The above comments were received by the applicant and a detailed response has been provided.

TRANSPORT FOR LONDON further comments
Modelling
As highlighted at Stage 1 and within TfL's detailed comments, traffic modelling is being carried out. The base models, which need to be agreed prior to future modelling scenario begins, for this application have yet to be signed off. A meeting has been held with the applicant to discuss the concerns with the base models and it is understood that these are currently being worked on.

It is understood that the Council is looking to take this application to the January committee. Noting the timeframes and current status of modelling, it is unlikely that the highway modelling will be completed prior to this application being presented. TfL have therefore sought to identify highway mitigation ahead of the modelling being completed, and request that SCOOT and bus priority measures for the junction with Pield Heath Road and the new access road through the site is included within the scope of the S278 works for this junction.

It must, however, be ensured that all modelling has been completed prior to Stage 2 referral with any further mitigation, in addition to that identified above, is secured through the appropriate mechanism

Healthy Streets
It is welcomed that the applicant has undertaken a night0time Active Travel Zone (ATZ) assessment. It is recommended that the Council secures a contribution towards delivering some of the suggested improvements within this night-time ATZ to ensure that these routes feel safe, comfortable and attractive to use at all times. It is noted that a number of suggestions for the night-time ATZ included improving lighting, improving the cycling environment and pedestrian crossings.

Whilst it is has been considered to be an attractive option to facilitate cycling to the hospital during the day, it is noted that one route - the cycling route to West Drayton - was not assessed as part of the night-time ATZ due to the unsafe nature of part of it. What alternative route is there for those who are cycling to use during darker hours?

It is noted that the applicant has stated that there is 'need to engage with stakeholders regarding the consistency of cycle provision from West Drayton Station to the development site. It is understood that the Council will secure a contribution towards improving the cycling infrastructure beyond the red line boundary. The findings of this ATZ assessment should be considered as part of any improvements.

TfL expect a proportionate contribution towards delivering the works identified within ATZ assessment (both day-time and night-time) to be secured within the S106 agreement.

It is noted that the applicant has updated the Healthy Streets check for this site. The Healthy Streets check looked at four segments around the site boundary.

It is noted that this revised Healthy Streets check has removed the 'zero' scores from Segment 2 from Phase 1b, with only Segment 3 and 4 having 'zero' scores.

For Phase 1b, it is noted that the applicant has provided some commentary as to why the two 'zero' scores have been obtained - there is no segregated cycle lane and the interaction between large vehicles and people and cycling is greater that 5% of motorised traffic.

The applicant has stated that there is limited opportunity for widening or constructing a segregated cycle/footway within the relevant segments without the wider redevelopment of the hospital site which will be delivered as part of Phase 2. They continue by stating that there is no opportunity to address these zero scores during Phase 1b as the existing hospital buildings and facilities will remain in place and operational until such time as services are decanted to the new hospital.

For segments 2 and 3, the applicant have scored themselves 2 on criteria 12 (shared Use) and 16 (Effective width for cycling), despite only having some shared use footway. 2 is the recommended score for a shared use footway that has very low pedestrian flows, and TfL would question whether low flows in this location is a realistic assumption.

For Phase 1b, Segment 3 - TfL does not agree that Criteria 15 is N/A due to there being no cycle lane. This score should be reviewed. Or has this been inputted incorrectly, and this criteria should

be the second 'zero' score?

From the information provided, it is not clear why the 'zero' scores have been removed from Phase 2. For example, for Phase 2, Segment 2 the vehicle numbers are the same yet the score has been changed from 0 to 1. The same is for criteria 14 and 15 which has gone from 0 scores to 3.

Site Connections and Permeability
The applicant's statement about Apple Tree Avenue is encouraging, although it would have been better to see a drawing.

Within TfL's detailed comments on this application, it was highlighted that further thought on the connections west to Royal Lane was required, with particular regard to cycle access. Our concern was raised in relation to the diagram shown in the DAS (page 57). TfL is looking for a clearer demonstration of how cycle permeability works through and around the site, as the diagram shown in the DAS shows no connectivity to the west of Royal Lane.

THHR_01-MMD-XX-XX-RP-U0008 states that the network will provide linked routes of minimum 2.0m wide footways / footpaths for pedestrians along with some minimum 3.0m shared-use pedestrian/cycleways. No plans have been provided to show where 2.0m-wide footways and 3.0m-wide shared use paths, as such TfL is unable to take a view as to whether this is acceptable to support active travel, and whether this will be supporting Mayoral policies.

Hospital Boulevard
In regards to the crossings on Hospital Boulevard, please could the applicant provide clarity on the type of crossings that are to be provided - are they zebra crossings or signalised? There is a concern that should people wait a long time to cross and having to take indirect routes, then they might start taking risks in crossing away from the designated crossings. In line with Policy D7, it should be ensured that safe, direct access to bus stops as well as from one part of the site is provided.

As highlighted in previous comments, the route between Pield Heath Road and the bus stops located on it, and the main hospital entrance will be a key route. As such, a high-quality walking environment that will be attractive to pedestrians from all walks of life to use at any time should be provided.

It is noted that the applicant has stated that this route will have high-quality surfacing, lighting, seating and planting to provide a safe and comfortable environment for all users. Whilst some of these aspects are shown in the provided CGI, they do not appear to be reflected in the submitted landscaped drawings, copied below for ease of reference, which presents a predominantly hard-landscaped area.

Noting the timeframes for this application, TfL request that a condition is secured in regards to the landscaping for this area to ensure that a high-quality and attractive pedestrian environment is created.

Pedestrian Environment
With regard to the provision of an eastern footway and a controlled crossing at the northern end of Colham Green Road, this leaves the eastern and western arms of the Pield Heath Road / Colham Green Road junction without safe crossing facilities. It is noted that the applicant has identified that the arrangements shown within the submission are indicative at this stage, and will be agreed with LBH at a later date. It is therefore requested that the provision of safe crossing facilities on the eastern and western arm of the Pield Heath Road/Colham Green Road junction is considered further at the detailed stage. This should be secured through the appropriate mechanism.

In line with the Mayor's Healthy Streets approach and to support achieving a strategic modal shift, the development should be designed to prioritse pedestrian and cyclist movement over that of vehicles.

A new mini roundabout is proposed within the site, with informal pedestrian crossing facilities only on three arms, as seen in figure 4.40 'Phase 2 internal access arrangements from Colham Green Road access' and Appendix Highway Layout drawings - Phase 2, Tracking Sheet 2, of the Transport Assessment. It is noted that the applicant has stated that the provision of crossing facilities on the eastern arm can be included at the detailed design stage. This should be secured through the appropriate mechanism.

Cycling Environment
There is no proposed cycle network diagram in section 4.4 of the TA, as such we are reliant on the diagram included within the DAS (copied above). Section 4.4 of the submitted TA does not provide a clear description of the proposals across the whole site. It is noted that a contribution towards delivering improvements to the cycle network beyond the red line boundary is to be secured.

Our previous comment about the type of infrastructure is that neither the Pield Heath Road nor the network of routes within the site, which as illustrated in the above figure taking from the design and access statement, does not join up, is that neither meet the expected level of services as set out in LCDS because they depend on shared use. TfL's preference would be for a dedicated cycle route.

As highlighted previously, in line with Policy T2 the proposed development should be designed to prioritise pedestrians and cyclists have priority over vehicles.

It is noted that the applicant has stated that should changes be required, this can be considered at detailed design stage. It is understood that PO1 and PO2 forms part of the outline phase (Phase 2), as such a condition to address this concern would be acceptable in this instance.

The Phase 2 cycle internal cycle route should be designed in line with the latest TfL guidance. A condition securing the detail of this route, and how it connects with the surrounding transport network, and how it has been designed in line with the Healthy Streets approach and TfL guidance should be secured.

It is appreciated that the site is constrained by the need to maintain an operational environment during construction, as such some of the proposed improvements will not occur within Phase 1. This means that cycle access is no better than is present. It is anticipated that Phase 1 could take up to 3 years to complete, as such it is considered the interim measures to improve cycling connectivity, which can then be built upon as part of Phase 2, should be identified and implemented

Proposed zebra crossing on Royal Lane - the provision of a zebra crossing here is supported, but can it and the raised table be delivered without infringing on the crossovers that householders will be using to access their driveways? This could be a useful cycle crossing too - cyclists travelling from the west could avoid using Pield Heath Road and approach instead using Peel Way and Bradshaw Waye. Consideration should be given to a parallel cycle and pedestrian crossing here. The crossing would need a short section of shared use on either side so that cyclists could legally access it.

A similar shared crossing could be considered where a zebra is proposed further north on Royal Lane, south of the roundabout junction with Pield Heath Road (shown in fig 3.7 on p25 of the pdf - page 16 of the 'Bus diversion and mobility hub' paper). This would allow cycles safe access to and from the cycle parking in the mobility hub. If the signal-controlled crossing to the west of the western arm of the roundabout were to be made into a toucan, and cycle access were permitted through the slip road / driveway access to the south-west of the roundabout, this would give cycles a way of accessing the cycle parking facilities without having to tackle the roundabout, which is a poor and

potentially unsafe environment for cycling.

It is noted that contributions towards enhancing the cycling network beyond the red line boundary is to be secured.

Wayfinding
It is noted that the applicant has stated that the final arrangements for the wayfinding can be conditioned. A contribution towards wayfinding should also be secured within the S106 agreement.

As highlighted in TfL's previous response, noting the majority of users of the proposed development is anticipated to be in their 70s, the applicant should be seeking to use dementia friendly signage. The requirement to provide such signage should be secured within the condition.

Mobility Hub
Additional information has been provided within the Mobility Hub Vision Paper.

Within the Mobility Hub Vision Paper, the importance of ensuring the right location for the Mobility Hub - one which ensures that is clearly recognizable, prominent and in an exposed frontage location - is emphasized.

Taking into consideration the proposed location of the hospital entrance and the bus stops (when diverted into the site), TfL is of the view that the location of the mobility hub should be located closer to these hospital entrance and bus stops in proximity. Furthermore, providing access to hub within proximity to the hospital entrance will be convenient for those going to and from the hospital. TfL still recommend that the mobility hub is relocated.

It is noted that the applicant has stated that the mobility hub will be open 24/7, although some elements such as the mobility hub area and the cafe will only be open certain hours.

Cycle Parking
The applicant has confirmed that five per cent of cycle parking spaces will be suitable to accommodate larger and adapted cycles. As identified in TfL's detailed comments, to accommodate larger cycles at least 1.8m between cycle parking stands should be provided. The applicant should also ensure that an appropriate mix of cycle parking is provided, as such should also be seeking to provide an appropriate proportion of Sheffield stands at standard spacing (1.2 preferred, 1.0m minimum).

It is noted that the applicant has confirmed that the cycle parking store, which is to be located in the mobility hub, is to be accessible 24 hours. It is understood that the following security measures are to be implemented:
- Street Lighting
- CCTV
- Security to be contactable at all time, although Travel Planning staff will not be reachable out of hours.

The Management and Maintenance of this facility should be secured through the appropriate mechanism.

The applicant has stated that a monitor and management mechanism, as detailed within the Mobility Hub Vision Paper, will be secured.

From the information provided within this Vision Paper, the review mechanism only appears to allow for flexibility in the allocation of spaces rather than a managed reduction to support achieving strategic modal shift.

It is considered that a stronger mechanism, secured within the S106 agreement (as highlighted during pre-application discussions), than that proposed by the applicant is required to support facilitating a strategic modal shift for both staff, patients and visitors in line with Policy T1.

Securing this mechanism through the S106 will help to achieve the desired outcome, and ensure that the requirements for effectively managing and monitoring the parking at this site are implemented. It will also allow for a greater level of detail to address the below to be included to ensure that the desired outcome is achieved.

It is noted that the applicant is proposing to implement hourly tariffs, with current rates identified within the Parking Design and Management Plan. The Parking Design and Management Plan also indicates that motorcycle parking will be free to use. TfL does not agree with this approach and considers that the motorcycle parking spaces should also be subject to a tariff. The price of parking at this site should also be increased on a yearly basis, with the increase linked to indexation.
The Review section of the Parking Design and Management Plan does not include a reference to removing parking spaces and repurposing this space for other uses I.e. additional cycle parking spaces, improved public realm. This requirement was identified within TfL's detailed comments.

It is understood that the Car Parking Policy is reviewed every three years. TfL request that this is undertaken at a more regular basis I.e. once a year.

The Parking Design and Management Plan should provide detail on the alternative uses that car parking spaces at this site could be changed to.

Car Parking
It is noted that the provision of 942 is a reduction from existing provision at this site. The London Plan, however, has a focus on sustainable and active travel and sets out a strategic mode shift target in Policy T1. As higlighted in pre-applications, there is a concern that the re-provision of such a singiicant number of parking spaces will undermine efforts to achieve mode shift ambitions and targets identified.

It is also useful to note that the total provision of 942 is above the spaces that the applicant themselves have identified as being the minimum necessary for their parking to be work effectively.

It is understood that the quantum proposed was based on a parking accumulation study based on forecast Scenario 2 trip, which has a focus on staff mode shift. No changes to patient modal split has been applied to this scenario.

The preference still is for a reduction in the quantum of car parking at this site to support achieving a modal shift. It is noted that the applicant refers to the monitor and manage mechanism, comments of which can be found above.

The provision of electric vehicle charging points should be secured through the appropriate mechanism. The provision of active EVCP at the car club spaces should be secured through the appropriate mechanism.

It is disappointing that there has not been a reduction in the quantum of car parking for the proposed nursery use, with the applicant seeking to maintain existing travel patterns to and from the nursery. Noting that part of this application is seeking to provide residential dwellings in proximity to the nursery as well as a bus service into the site, this facility can be accessed by means of sustainable and active travel. A reduction in the quantum of parking for the nursery is sought.

The provision of disabled person parking space, and accessible enlarged bays, should be secured through the appropriate mechanism.

A Parking Design and Management Plan should be secured through within the S106 agreement.

Multi-Storey Car Park
Whilst it is appreciated that the proposed development represents a reduction in the quantum of car parking from the existing provision, TfL is still of the view that the parking provision provided has not been robustly justified.

It is considered that a stronger parking review mechanism is required to support facilitating a strategic modal shift and the targets set out in the Travel Plan.

Access/Public Transport
The preference is that TfL Buses have assurance at this stage that the proposed highway layout will not have a detrimental impact on bus operations, in line with Policy T3. It is noted that the applicant has provided swept path analysis for a 12m going through the site. This is currently being reviewed by TfL Engineering.

It is noted that the applicant has undertaken a Stage 1 Road Safety Audit. The findings of this RSA should be taken into consideration by the relevant highway authority, with design changes undertaken where appropriate.

It is noted that the applicant has stated that the issue in regards to ownership of the roads in which buses operate along can be addressed as part of any future Section 38/Section 278 Agreements between the Trust and the Council. It is important that bus access arrangements are secured within the S106. To this end, TfL will provide our requested Heads of Terms to be included within the S106 agreement for this site.

Construction Logistics Plan
Whilst it is noted that an outline Construction Logistics Plan (CLP) has been provided, TfL will expect a full CLP to be secured through condition in line with Policy T7.

It is noted that the CLP has identified during the peak construction time for the main hospital building there could be up to 90 vehicles a day. It is understood that construction consolidation centres (CCC) will be used during the construction period, with vehicle routing from a CCC being identified within the outline CLP.

As highlighted above, TfL expect a full Construction Logistics Plan (CLP) to be secured through condition. As part of developing this CLP, the applicant should explore measures that can be introduced to reduce vehicle movement to and from this site.

Delivery and Servicing Plan
A Delivery and Servicing Plan (DSP) should be secured through the appropriate mechanism for all land uses, in line with Policy T7. This should detail the measures that will be implemented to minimise the impact, that this activity has on the surrounding transport network, including the number of vehicles coming to and from this site.

Travel Plan
It is noted that the targets contained within the Travel Plan will be updated upon completion of the proposed development and future post-pandemic travel surveys. As highlighted previously the targets should seek to align with that of the strategic mode shift target, detailed in Policy T1.

TfL does not necessarily agree with the approach in regards to mode share for patient trips. Noting that there will be a bus service running through the site and a mobility hub being provided, there will be an option for patients and visitors to access this sites with sustainable and active travel. The applicant should seek to ensure that appropriate measures, for both staff and patients, are

implemented to support achieving a strategic modal shift.
A Travel Plan should be secured through the appropriate mechanism.

TRANSPORT FOR LONDON Bus Heads of Terms request
Road Ownership/Bus Lease Arrangements - To allow access through the site for buses/grant TfL a license or lease to run bus services through the site, including:
- The agreement of the detailed specification for the roads in which buses will operate along to be agreed with the Council, in consultation with TfL
- Appropriate agreement to cover the provision and cost of works required to facilitate the provision of road infrastructure that allows for safe and efficient two-way bus movement through the site. The appropriate agreement will also include a Safety Audit for the road infrastructure in which buses will run along, with a commitment to address all concerns raised within this Audit
- Clause to restrict occupation of the Phase 2 until highway works to facilitate new bus route into the site have been implemented
- To construct the roads in which buses will operate along to adoptable standards
- Submission and agreement of an Operating and Maintenance Plan for the roads in which buses will operate along by the Council, in consultation with TfL

NATIONAL HIGHWAYS
National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the Transport Assessment and other relevant planning documents as prepared on behalf of the applicant by Mott Macdonald. National Highways interests relate to the operation and safety of the SRN, and in the case of this proposed development, specifically the potential impact upon the M4 J4, M40 J1 and the A40/B467 junction. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN during construction and operation.

National Highways understands that the site currently comprises Hillingdon Hospital and an ancillary children's nursery and pharmacy. The site provides approximately 977 car parking spaces on-site, with an additional 175 spaces off-site. The proposed development is a hybrid application, with a full application submitted for the demolition of the existing buildings on site and their replacement with a new hospital, car parking and other ancillary uses, and an outline application for a mixed use development comprising residential (Class C3) and supporting Commercial, Business and Service uses (Class E). The outline application comprises up to 327 residential units and up to 800 sqm Class E uses with associated car parking for up to 302 vehicles. The scheme is proposed to be delivered in four phases.
We would always recommend that an applicant engages with National Highways early during the TA scoping process to ensure impacts to the SRN (and LRN) are appropriately assessed, to include an assessment of nearby SRN junctions, in this instance the M4 J4, M40 J1 and the A40/B467 junction. Regretfully this does not appear to have been the case in this instance.

A bespoke Clinical Travel Demand Model (CTDM) has been produced to provide a baseline of existing trip generation at the site and a comparison with trip generation for the proposed scheme. This model has reportedly been validated against 2018 TRICs surveys and November 2021 baseline travel surveys at the hospital, and provides overall daily numbers of trips by mode to and from the hospital, including in the AM and PM peak periods. It indicates that at present there are ~4600 daily two way trips in private cars associated with the current site uses. National Highways will review this model and provide further comment on it in due course.

The proposed trip generation associated with the hospital element of the scheme has also been derived from the CTDM in two 2028 future year scenarios. In both scenarios the model forecasts an overall reduction in patient numbers using the hospital. Scenario 1 uses the same mode share as in the baseline, resulting in ~4200 two way private vehicle trips daily, and Scenario 2 focuses on a shift to sustainable and active travel for staff at the new hospital site and a modal shift away from staff use of private vehicles, resulting in a slight reduction in private vehicle trips overall.

Trip generation for the residential element of the scheme has been derived from TRICS data, providing overall person trip rates, with local mode shares derived from 2011 Census data then applied to calculate the numbers of trips in the AM and PM peak periods by differing modes of travel. This indicates a total of 116 two way private vehicle trips in the 8-9 AM peak and 88 trips in the 4-5 PM peak. National Highways is generally in agreement with this methodology and the trip rates used appear generally robust and reliable. These trips have then been applied to the hospital trip generation to produce combined future year trip forecasting for the development. From the information provided, overall forecasts for the hospital and residential elements of the proposed development indicate ~4700 two way private vehicle trips daily under Scenario 1, and ~4550 two way private vehicle trips daily under Scenario 2.

National Highways notes that no trip forecasting exercise has been provided for the proposed commercial space within the development.

Trip distribution has been derived from ANPR data set up in nine locations on the local road network and collected during November 2021 baseline surveys. We note that the forecasted numbers from this distribution have only been provided for the local road network in close proximity to the site, and no assessment has been provided for the portion of trips which will reach the SRN.

Although a large proportion of the trips associated with the hospital use will already be on the local and strategic road networks given the sites extant use, in view of the significant numbers of trips associated with the hospital, the addition of large numbers of residential units to the site, and the absence of any assessment of trip forecasting associated with the proposed Class E land uses, we will require further information to determine the impact of the application on our network.

National Highways will require accurate information regarding the vehicle trip generation associated with the proposed Class E land use, which should be identified from TRICS data. Vehicle trip distribution and assignment covering the SRN for all existing and proposed land uses should either be extrapolated from existing ANPR surveys or from census data and using suitable journey mapping software. Existing and proposed vehicle trip impacts should be presented as turning movements at M4 J4, M40 J1 and the A40/B467 junction for the sensitive weekday morning and evening peak hours. Based on the change in levels of traffic predicted, junction capacity assessments maybe required. This will enable us to determine the severity of this developments traffic on the operation and safety of the SRN.

We draw your attention to Paragraphs 9 and 10 of the DfT Circular 02/2013 which refers to development proposals being unacceptable, by virtue of a severe impact, if they increase demand for use of a section of the network that is already operating over-capacity or cannot be safely accommodated within the existing infrastructure provision, unless suitable mitigation is agreed. National Highways considers that any development trips adding to a grade separated junction off-slip, which then results in mainline queuing, extends a mainline queue, and/or increases the frequency at which a mainline queuing occurs, to be an unacceptable safety impact. In such a circumstance, we would seek mitigation measures for any severe / significant impacts generated, also taking into consideration any improvements schemes identified as part of the emerging Local Plan.

Once this information has been received and National Highways has had chance to further consider

the proposed impact of the development on the nearby SRN junctions, we will advise on further steps that may be required. We would be grateful if these comments could be passed to the applicant and we would be happy to discuss them further.

Recommendation
National Highways recommends that London Borough of Hillingdon does not grant planning permission for the development proposals (Ref: 4058/APP/2022/1788) for a period of 56 days (until 6 September 2022).

Reason: To provide the applicant with sufficient time to address outstanding concerns regarding development traffic impact on the SRN.

Case Officer:
The above comments were provided to the applicant and their Transport Consultant has provided a response with additional details regarding the predicted traffic movements as a result of the proposed Class E Land Uses and their subsequent impact on the Strategic Road Network.

NATIONAL HIGHWAYS further comments
We have undertaken a review of the Transport Assessment and other relevant planning documents as prepared on behalf of the applicant by Mott Macdonald. National Highways interests relate to the operation and safety of the SRN, and in the case of this proposed development, specifically the potential impact upon the M4 J4, M40 J1 and the A40/B467 junction. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN during construction and operation.

We are grateful for the additional information now supplied from the applicant's transport consultants. We have reviewed the supplied technical note (Response to TfL, GLA, NH, LBH and WSP Comments at Planning Stage) and note that the consultants have now provided trip forecasting information for the commercial elements of the scheme, as requested in our initial holding response back in July. This includes the proposed movements at National Highways junctions associated with this land use. However, the remainder of our initial concerns have still not been addressed in the technical note.

As noted previously, although a large proportion of the trips associated with the hospital use will already be on the local and strategic road networks given the sites extant use, in view of the significant numbers of trips associated with the hospital, the addition of large numbers of residential units to the site, and the proposed Class E land uses, we will require further information to determine the impact of the application on our network.

The trip distribution within the Transport Assessment has been derived from ANPR data set up in nine locations on the local road network and collected during November 2021 baseline surveys. However, the forecasted numbers from this distribution have still only been provided for the local road network in close proximity to the site, and no assessment has been provided for the portion of trips which will reach the SRN.

Vehicle trip distribution and assignment covering the SRN for all existing and proposed land uses should either be extrapolated from existing ANPR surveys or from census data and using suitable journey mapping software. Existing and proposed vehicle trip impacts for all land uses should be presented as turning movements at M4 J4, M40 J1 and the A40/B467 junction for the sensitive weekday morning and evening peak hours. Based on the change in levels of traffic predicted, junction capacity assessments maybe required. This will enable us to determine the severity of this developments traffic on the operation and safety of the SRN.

We draw your attention to Paragraphs 9 and 10 of the DfT Circular 02/2013 which refers to

development proposals being unacceptable, by virtue of a severe impact, if they increase demand for use of a section of the network that is already operating over-capacity or cannot be safely accommodated within the existing infrastructure provision, unless suitable mitigation is agreed. National Highways considers that any development trips adding to a grade separated junction off-slip, which then results in mainline queuing, extends a mainline queue, and/or increases the frequency at which a mainline queuing occurs, to be an unacceptable safety impact. In such a circumstance, we would seek mitigation measures for any severe / significant impacts generated, also taking into consideration any improvements schemes identified as part of the emerging Local Plan.

Once this information has been received and National Highways has had chance to further consider the proposed impact of the development on the nearby SRN junctions, we will advise on further steps that may be required.

Recommendation
National Highways recommends that London Borough of Hillingdon does not grant planning permission for the development proposals (Ref: 4058/APP/2022/1788) for a period of 56 days until 1st February 2023 to allow the applicant to respond to our previous queries.

Reason: To provide the applicant with sufficient time to address outstanding concerns regarding development traffic impact on the SRN.

Case Officer:
The above comments were provided to the applicant and their Transport Consultant has provided a response with additional details regarding the predicted traffic movements as a result of the proposed Hospital, Residential and Class E Uses and their subsequent impact on the Strategic Road Network.

NATIONAL HIGHWAYS 3rd comments
We refer to our previous correspondence regarding this site, most recently our updated Holding recommendation on 7th December. We have now received further information from the applicant on 16th December.

We understand that the proposals are relatively bespoke in nature in terms of identifying trip generation, however in general we accept the methodology used. We are grateful that the applicant has now outlined a comparison between all existing and proposed trips on the network, as we have requested previously.

Although we are unable to fully endorse all the information provided within the TA, given the limited scale of the proposed increase in vehicle trips compared to the extant land uses on site, we are satisfied that the proposals would not materially affect the safety, reliability and/or operation of the strategic road network (SRN).

Recommendation
National Highways raises no objections

CLINICAL COMMISIONING GROUP (CCG)
NHS North West London Integrated Care Board is fully supportive in the direction of travel for the Hillingdon Hospital planning application.

LONDON BOROUGH OF HOUNSLOW
The council does not wish to comment on this application at this moment in time.

THREE RIVERS DISTRICT COUNCIL

This Council has considered the above application and raises NO OBJECTION to the application subject to your authority ensuring that the proposal complies with all relevant policies contained in the adopted Development Plan and guidance contained within the National Planning Policy Framework.

CANAL AND RIVER TRUST
No comments

NATIONAL AIR TRAFFIC SERVICES (NATS)
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.

HEATHROW AIRPORT LIMITED (HAL)
The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any Full planning permission or Outline planning permission granted is subject to the conditions detailed below:

Full Planning Application

Submission of a Bird Hazard Management Plan
Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds.

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the buildings. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: It is necessary to manage the flat roofs to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

Information
The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances, it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

We will need to object to these proposals unless the above-mentioned condition is applied to any planning permission.

We would also make the following observations:

Landscaping
The development is close to the airport and the landscaping which it includes may attract birds which in turn may create an unacceptable increase in birdstrike hazard. Any such landscaping should, therefore, be carefully designed to minimise its attractiveness to hazardous species of birds. Your attention is drawn to Advice Note 3, 'Potential Bird Hazards: Amenity Landscaping and Building Design' (available at http://www.aoa.org.uk/policy-campaigns/operations-safety/

Cranes
Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf

Outline Planning Application

Height Limitation on Buildings and Structures
No building or structure of the development shall be permitted to infringe the Obstacle Limitation Surface (OLS) known as the Conical surface. This is a sloping surface that passes over this site from the Southern boundary (77m Above Ordnance Datum (AOD)) to the Northern boundary (89m AOD) on a 1:20 gradient.

Reason: Any development that penetrates the OLS surrounding Heathrow Airport could endanger aircraft movements and the safe operation of the aerodrome.

Submission of a Bird Hazard Management Plan
Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds.

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the buildings. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: It is necessary to manage the flat roofs to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

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The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

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It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

MINISTRY OF DEFENCE
The application site is within statutory safeguarding zones drawn to preserve the operation and capability of RAF Northolt. Specifically, the application site falls within zones where the height of development, the potential for the development to introduce or exacerbate birdstrike risk, and the impact of development on the operation of technical assets and equipment are of particular concern. The application site is located approximately 4.12km to the south west of the centre of RAF Northolt

Aerodrome height and technical safeguarding zones
The proposed development site occupies the statutory height and technical safeguarding zones that ensure air traffic approaches and the line of sight of navigational aids and transmitters/receivers are not impeded. The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre.

After reviewing the documents that relate to the application for full planning permission, I can confirm that the MOD has no concerns in respect of the maximum height of the buildings, which have a maximum height of 44.25m above ground level.

At such time as a reserved matters application is submitted, the MOD should be consulted in order that assessments can be completed to ensure that the development and the works required to implement them do not intrude into any protected airspace.

The MOD recognises that implementation of parts of the development to which both the full and/or outline planning application might apply may require the use of cranes or other tall construction equipment. This equipment may, temporarily, form a physical obstacle within an area where aircraft are at a critical stage of flight. In order to mitigate this harm a condition requiring the submission, approval, and implementation of a Construction Management Strategy should be attached to any consent issued. This Construction Management Strategy should provide details of tall plant and construction equipment (including cranes) which will be used on the site, details of aviation safety

lighting that would be displayed on that tall plant or construction equipment, details of groundwork/construction/development activities that could give rise to dust and smoke which might be ingested by aircraft engines or obstruct visibility, details of any site lighting to be used, and details of measures to be taken to manage the development site to ensure that it does not form an attractant to those large and/or flocking birds hazardous to aviation safety. A suggested condition wording is provided below:

No development shall take place unless or until such time as a construction management strategy has been submitted to and approved in writing by the Local Planning Authority in consultation with Ministry of Defence. The construction management strategy shall include, but not be limited to:
· details of any cranes and/or other tall construction equipment to be used to or in support of implementing the development approved;
- a schedule, to include dates and times, for their presence and operation on site;
- details of a liaison protocol through which RAF Northolt can be notified of any amendments to that schedule; and
- details of obstacle lighting that will be used on any crane or tall construction equipment that will be used on site

The development should be carried out strictly in accordance with details approved unless agreed in writing with the Local Planning Authority in consultation with Ministry of Defence.

Reason:
To ensure that construction work and the associated equipment used at, or in association with, the development proposed does not obstruct air traffic movements or otherwise impede the effective operation of technical assets that contribute to aviation safety through air traffic management.

Birdstrike safeguarding zone
The site identified falls within a birdstrike safeguarding zone, within which the principal concern of the MOD is that the creation of new habitats may attract and support populations of those large and/or flocking bird species that can be hazardous to aviation safety. The position and proximity of the application site relative to RAF Northolt has the capacity to increase this risk.

There are a number of aspects of the development proposed, across both the detailed part of the application and indicated in the outline part that have the potential to create attractants for hazardous bird species. The landscaping details submitted identify tree species such as Oak that form dense canopies which have the potential to attract and support roosting corvids and Wood Pigeons. The use of these species should be minimised or, ideally, omitted. If these species are to be used the numbers should be kept to a minimum and, where they are proposed, should be widely spaced from other similar species to prevent canopies knitting together and creating new roost sites.

A condition is requested that requires the submission, approval, and implementation of a landscaping scheme that minimises the potential for landscaping to result in increased birdstrike risk. A suggested condition wording is provided below:
No development shall take place unless or until such time as a planting schedule detailing both species and planting locations has been submitted to and approved in writing by Local Planning Authority in consultation with the Ministry of Defence. Planting shall be carried out and maintained strictly in accordance with the details approved.

Reason.
To limit the potential of the development to result in the creation of environments attractive to those large and/or flocking bird species which are hazardous to aviation safety.

Swales and wetlands are proposed throughout the development which also details a 'wetland park' to the west of the site. Swales as long as they remain predominantly dry should not attract larger

waterfowl species. Ponds and other wetland features may, depending on whether they hold water for any prolonged period, have the potential to attract larger waterfowl (including feral geese) and waterbird species. The attractiveness of these features to those species hazardous to aviation safety, larger waterfowl and waterbirds in particular, can be minimised by ensuring that the drain to dry times for each element of the sustainable drainage system is no more than 48 hours after any rain/storm event. Where this is not possible further mitigation measures will be required to deter problematic species. Mitigation measures may include such things as the planting of dense marginal vegetation around the perimeter of each waterbody, the use of goose proof fencing until that planting is established, steep bank profiles, and ensuring that waterbodies contain no islands. For clarity, underground attenuation, permeable surfaces, and rain gardens are unlikely to create attractant environments for hazardous bird species.

Proposals within the full and outline parts of the application include several large buildings, including the new hospital, Multi storey car park and residential buildings, which will feature flat/shallow-pitched roofs as well as areas of green roof. These forms of roof space have the potential to attract hazardous bird species, in particular 'large' gulls such as Herring Gulls and Lesser Black-backed Gulls, which will utilise these areas for breeding and loafing.

To address the potential of the development through the creation of waterbodies or the use of flat/shallow pitched/green roofs to create/provide an environment attractive to those large and/or flocking birds hazardous to aviation, the MOD requests that a condition requiring the submission, approval, and implementation of a Bird Hazard Management Plan (BHMP) is attached to any planning permission issued. A suggested condition wording is provided below:

No development shall take place unless or until such time as a Bird Hazard Management Plan (BHMP) has been submitted to and approved in writing by Local Planning Authority in consultation the Ministry of Defence. The BHMP shall include but not be limited to:
· Identification of species that may cause detriment to aviation safety;
· Details of an inspection and monitoring schedule which incorporates appropriate qualifications and experience levels for those carrying out inspections and details of means of access to flat roofs;
· Details of design or management measures that will be employed to discourage birds from being attracted to the site (to address permanent and/or temporary waterbodies as well as flat/shallow pitched/green roofs);
· Identification of the number of those species that should trigger dispersal or control actions;
· Details of dispersal and bird control actions that may be applied (to include removal/dispersal of hazardous birds and their associated eggs and nests, adhering to the strict instructions stated in the Natural England CL-12 licence);
· A protocol for recording bird numbers, actions taken and their outcomes;
· A liaison protocol to provide RAF Northolt with notice that actions are to be taken; and
· Detailed design and maintenance schedules for any and all proposed attenuation basin/pond or waterbody to include drain to dry times, and details of actions intended to maintain that drainage capacity.

The Bird Hazard Management Plan shall be implemented strictly in accordance with the details approved and maintained for the life of the development. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by Local Planning Authority, in consultation with RAF Northolt and the Ministry of Defence.

Reason.
To limit the potential of the site to attract and support populations of those bird species that may cause detriment to aviation safety.

At such time as a reserved matters application is submitted for that part of the site to which the application for outline consent applies, MOD will have similar concerns to those detailed above for

the full permission part of the application and it is likely similar conditions will be requested. The potential for the development of the site to result in the creation of environments attractive to those large and/or flocking bird species hazardous to aviation safety should be considered at the design stage and mitigation incorporated into detailed proposals.

Subject to the above conditions being attached to any planning permission granted, the MOD maintains no safeguarding objection to this application.

THAMES WATER
Waste Comments
As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission.
"No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:-
1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or-

2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line. Please refer to the Wholsesale; Business customers; Groundwater discharges section.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Water Comments
With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection and may wish to discuss the implication for their development with a suitably qualified environmental consultant.

Surface Water: With agreement from the LLFA, Thames Water approves the Surface Water drainage strategy for the detailed planning application, and approves the outline proposal in principle pending the detailed application in future.

ENVIRONMENT AGENCY
As part of the consultation, we have reviewed the Hillingdon Hospital Geotechnical and Geo-environmental Assessment of Phase 1 Ground Investigations - AECOM (Doc Ref: THHR_01-ACM-XX-XX-RP-Y-9001), dated 17th March 2022.

Environment Agency position
Based on a review of the submitted information we have no objection to the proposals, subject to the inclusion of the 7 planning conditions below on any grant of decision notice. Without these conditions we feel that the development would pose an unacceptable risk to groundwater, and we would object to the proposal.

We ask to be consulted on the details submitted for approval to your authority to discharge these conditions and on any subsequent amendments/alterations.

Site context
Groundwater at this location is particularly sensitive because the site is located within a groundwater Source Protection Zone 1 (SPZ1). Areas in SPZ1 are the catchment areas for sources of potable, high quality water supplies usable for human consumption. Groundwater at this location is therefore particularly vulnerable to polluting uses on the surface. All development proposals within SPZ1are carefully monitored. The site is also underlain by a Secondary A superficial aquifer (Boyn Hill Gravel Member) and is located within a Water Framework Directive Groundwater water body with "Poor" overall classification (Lower Thames Gravels GB40603G000300).

Conditions
Condition 1 - Land Affected by Contamination
No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall be submitted to and approved, in writing, by the local planning authority:
1. A preliminary risk assessment which has identified:
· all previous uses
· potential contaminants associated with those uses
· a conceptual model of the site indicating sources, pathways and receptors
· potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action
Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason
This condition will ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.

Condition 2 - Verification Report
No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with

the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason
To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 3 - Long Term Monitoring and Maintenance Plan for Groundwater
No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason
To ensure that the site does not pose any further risk to the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 4 - Previously Unidentified Contamination
If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason
No investigation can completely characterise a site. This condition ensures that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 5 - Borehole Management
A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

Reason
To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 174 of the National Planning Policy Framework and Position Statement N Groundwater resources of 'The Environment Agency's approach to groundwater protection'.

Condition 6 - Piling / Foundation works Risk Assessment with Respect to Groundwater Resources
Piling, deep foundations and other intrusive groundworks using penetrative measures shall not be carried out other than with the written consent of the local planning authority. The development shall

be carried out in accordance with the approved details.

Reason
To ensure that any proposed piling, deep foundations and other intrusive groundworks do not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework and Position Statement N. Groundwater Resources of the 'The Environment Agency's approach to groundwater protection'.

Condition 7 - Infiltration of Surface Water onto the Ground
No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason
To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 174 of the National Planning Policy Framework.

Advice to the applicant

We recommend that developers should:
· Follow the risk management framework provided in Land Contamination: Risk Management (formerly CLR11), when dealing with land affected by contamination.
· Refer to the Environment Agency Guiding Principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
· Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. The Planning Practice Guidance defines a Competent Person (to prepare site investigation information): "A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation." (http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary)
· Refer to the contaminated land pages on GOV.UK for more information.

We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. e.g., British Standards when investigating potentially contaminated sites and groundwater, and reference with these documents:
· BS5930:2015 Code of practice for site investigations;
· BS 10175:2011 A1:2013 Code of practice for investigation of potentially contaminated sites;
· BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;
· BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns but more may be required to establish the conceptual site model and groundwater quality. See RTM 2006 and MNA guidance for further details).
· BS ISO 18512:2007 Soil Quality. Guidance on long-term and short-term storage of soil samples
· BS EN ISO 5667:3- 2018. Water quality. Sampling. Preservation and handling of water samples
· Use MCERTS accredited methods for testing contaminated soils at the site.
· Guidance on the design and installation of groundwater quality monitoring points Environment Agency 2006 Science Report SC020093 NB. The screen should be located such that at least part of the screen remains within the saturated zone during the period of monitoring, given the likely annual fluctuation in the water table. In layered aquifer systems, the rs zone should be of an appropriate

length to prevent connection between different aquifer layers within the system.

A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out.

The following should be considered:
· Use MCERTS accredited methods for testing contaminated soils at the site
· The DQRA report should be prepared by a "Competent person" (e.g., a suitably qualified hydrogeologist). The DQRA should be based on site-specific data, however in the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.
· Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m. Further guidance is available at: https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments

Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with the Land Contamination: Risk Management guidance.

Competent Persons
Any remediation strategy must be carried out by a competent person, in line with paragraph 183 of the National Planning Policy Framework. The National Planning Policy Framework defines a "Competent Person (to prepare site investigation): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation".

SUDs
Where SUDs are proposed - Infiltration SUDs should not be located in unsuitable and unstable ground conditions such as land affected by contamination or solution features. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit. Further advice is available in the updated CIRIA SUDs manual http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx

Piling
For piling (or other deep penetrative) works, where the piles (or other deep structures) extend into aquifer units within SPZ1, a foundation works risk assessment and groundwater monitoring programme will be required.
The foundation works risk assessment should consider potential risks to groundwater
resources that could arise as a result of deep piling works. A groundwater monitoring programme should be designed to collect information prior to and during the works to demonstrate that any piling (or other deep penetrative) works are not having an adverse impact on groundwater quality in the area. The piling risk assessment and groundwater monitoring plan should provide a mitigation / action plan should an adverse impact to groundwater quality be noted during the works.
Within SPZ1, we recommend that real-time monitoring for in-situ groundwater quality parameters, including conductivity and turbidity, should be incorporated into the groundwater monitoring plan as these provide valuable on-site data that can enable rapid decision making with respect to mitigations if required.
A brief introduction to the potential hazards associated with piling through contaminated soils can be found:
http://webarchive.nationalarchives.gov.uk/20140328084622/http:/cdn.environment-

agency.gov.uk/scho0202bisw-e-e.pdf
Monitoring wells installed to support a piling risk assessment should be installed to at least 5m deeper than the deepest piled foundation to capture any impacts from the proposed groundworks during and post construction.

Waste off-site
Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:
- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.
If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period the developer will need to register with us as a hazardous waste producer. Please refer to the waste management page on GOV.uk for more information.

Material Re-use on-site
The CL:AIRE Definition of Waste: Development Industry Code of Practice (Version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:
· excavated materials that are recovered via a treatment operation can be re-used on-site provided they are treated to a standard such that they fir for purpose and unlikely to cause pollution
· treated materials can be transferred between sites as part of a hub and cluster project
· some naturally occurring clean material can be transferred directly between sites
· developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:
· The position statement on the Definition of Waste: Development Industry Code of Practice
· The waste management page on GOV.uk

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Case Officer comments:
The above conditions 1, 2 and 4 requested by the Environment Agency duplicate most of the details required in the condition recommended to be attached to any grant of planning consent by the Council's Contaminated Land Officer. Following discussions with the Council's Contaminated Land Officer, who will be consulted for the discharge of these conditions, it is proposed to use their recommended wording. The wording of conditions 3 and 5 requested by the Environment Agency is proposed to be amended to include 'in consultation with the Environment Agency' given that they have the specialist knowledge required for their discharge. Conditions 6 and 7 replicate details

required by Thames Water conditions which are recommended to be attached to any grant of planning consent.

NATURAL ENGLAND
Natural England has no detailed comments to make on this proposal.

HERTS AND MIDDLESEX WILDLIFE TRUST
The biodiversity net gain assessment identifies a net loss in river and hedgerow habitat. It offers courses of action to address this. These must be formally adopted in the landscaping plans before this application can be approved. In addition, once these changes have been made, a Landscape and Ecology Management Plan must be submitted that details how the outputs of the metric will be achieved. This must be directly tied to the unit targets in the metric. It must include a 30 year minimum management plan, monitoring plan and schedule to show that the habitats are achieving their stated condition, contingency plan if the monitoring reveals that condition is not being met, bodies responsible for management and funding. The monitoring reports must be submitted regularly to the LPA for comment and approval.

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (GLAAS)
Recommend No Archaeological Requirement

Thank you for your consultation received on 2022-06-22.
The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

Although this is a large development site it does not lie in an Archaeological Priority Area and has been intensively developed in the twentieth century. The applicant's desk-based assessment notes that there are only limited archaeological records in the vicinity of the site - although its eastern side includes a listed 19th century house and was formerly part of the common-edge settlement of Colham Green. Also, its location on a Thames gravel terrace would likely have been a favoured location in prehistory. Overall I conclude that the site has low archaeological potential because remains are likely to have been destroyed, truncated or fragmented by modern development and there is no indication that remains of high archaeological significance should be expected.

No further assessment or conditions are therefore necessary.

LONDON FIRE BRIGADE
The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

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.

Other Comments:
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.

I also enclose Guidance note 29 on Fire Brigade Access similar to that in B5 of the Building Regulations, Particular attention should be made to paragraph 16, Water Mains and Hydrants, by the applicant. If there are any deviations from the guidance in ADB) vol 1 and 2: B5 Access and facilities for the fire service in relation to water provisions, then this information needs to be provided to the Water Office (water@london-fire.gov.uk) to discuss the proposed provision.

If there are any deviations to Brigade access and facilities, then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision. Once we have received this information then the LFB can provide a response on the consultation. advice in regard to hydrants upon receipt of an appropriate site plan showing premises layout, access to it, and water supply infrastructure if available.

SECURED BY DESIGN OFFICER (MET POLICE)
I have met with representative from Hillingdon hospital site. in short:

- No objections or requests to make in relation to the hospital or its carpark. I will continue to be available to representatives from this development to ensure the site is build as securely as possibly

- In relation to the housing estate, no objections, however I request the usual planning condition that Secured By Design accreditation is achieved by the site, which will ensure that a minimum level of security is installed that is appropriate for the level of crime that it will face in Hillingdon.

Internal Consultees

POLICY TEAM
Redevelopment of the Hospital

The proposal involves the phased replacement of the existing hospital with a new hospital. The current hospital floorspace amounts to 55,000 sqm and the proposal would deliver a larger hospital of approximately 79,604 sqm. An additional expansion at a later date is also included within the scheme if required. The new hospital would also allow for a more efficient arrangement, which in turn would allow additional services to be provided. The range of services being provided at the hospital will remain the same as those existing. Please note that the hospital building should be conditioned accordingly to prevent its use for other uses within Class E.

The Development Plan is supportive of new and expanded health facilities. The Strategic Infrastructure Plan (SIP) (2017), which underpins the Local Plan, highlights that there is a need to redevelop Hillingdon Hospital to ensure ongoing sustainability of acute hospital services in the borough. The redevelopment of Hillingdon Hospital is also accounted for within the West London Strategic Infrastructure Delivery Plan (SIDP) (2021).

Town Centre Uses

The application form states that the proposal includes 783 sqm (GIA) of A1 - shops. This needs to be amended to reflect the correct Use Class Order. The application description just states 'commercial floorspace'.

It is noted from discussions that the intention is to have 800 sqm of 'town centre uses'. It is recommended that this is amended to Use Class E, F1 and F2. If the case officer believes any individual uses within these classes would not be permissible, these can be removed.

Policy DMTC 1 of the Local Plan: Part 2 (2020) outlines that main town centre uses will typically be

required to follow a sequential approach. However, it is noted that the proposed town centre uses are directly linked to the new community that would be created by the larger hospital and the new residential units. They also have a role in activating a new area of public realm. It would therefore not be logical to insist on a sequential test, noting that there is an inherent requirement for these uses to be in this location.

Policy DMTC 1 also requires an impact assessment for main town centre uses that would exceed 1,000 sqm or 200 sqm of gross retail floorspace. It is noted that 783 sqm falls below the higher threshold for cumulative town centre uses and a retail impact assessment is therefore not required on this basis. However, a restriction is required to ensure all of this floorspace is not occupied by Use Class E(a), as this would trigger the need for an impact assessment. I suggest this should be capped at 200 sqm (in line with the Development Plan), unless the case officer believes there is any site-specific reason to set this higher.

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.

In terms of site-specific matters, the site is not located near to a town centre, with proposal located approximately halfway between Hillingdon Heath Local Centre and Yiewsley/West Drayton Town Centre. The site is also not located near to a tube or train station. The PTAL rating of the site varies but is rated 3 at its highest due to good bus frequency.

It is noted that the proposal will provide 50% affordable housing by habitable room, in line with the Council's required affordable housing tenure (70% low-cost rent and 30% intermediate). Therefore, by its nature, a larger than usual proportion of the scheme will need to be designed for family sized accommodation, to meet the need for larger low-cost rent units. However, it is noted that, at 6, 7 and 8 storeys, the residential buildings will be arranged as flats rather than houses.

Noting all of the above, it is considered that the housing size mix should include a minimum of 35% family sized units (3 bedroom or larger).

CONTAMINATED LAND OFFICER
I have reviewed the Geo-environmental details within a copy of the following report which was submitted in support of the application:

Title: Hillingdon Hospital, Geotechnical and Geo-environmental Assessment of Phase 1 Ground Investigations.
Derivation of Phase 1 Geotechnical and Geo-environmental Ground Models and Recommendations

Ref: 60642181 THHR_01-ACM-XX-XX-RP-Y-9001, Rev P02
Date: 17 March 2022.
Prepared by: AECOM Limited

The geo-environmental information concerning current preliminary findings, including the proposed approach for phasing of additional ground investigation/s is acceptable.

The report clearly states the submitted phase 1 GI was conducted as "only an initial assessment" which "must be reviewed and updated after a more detailed Phase 2 GI"

Observations:
The geo-environmental details within the submitted report represent findings of a phase 1 Ground Investigation with Tier 2 GQRA's (for human health and controlled waters) as implemented to determine and assess the site in terms of the extent, physical/chemical characteristics and associated impacts of any identified land contamination on suitably identified receptors.

It is understood the planned work/s at Hillingdon Hospital are to be addressed in a series of phases, as shown on the submitted drawings, (THHR_01-PRP-WS-ZZ-DR-A-200020 Rev P04 and THHR_01-IBI-WS-XX-DR-A-100007 Rev P01).

It is also understood there are to be additional phased approaches adopted for individual geo-environmental ground investigations.

I therefore recommend the following condition/s to be imposed:

Proposed conditions for land affected by contamination.

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

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

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

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

(iii) Upon completion of the approved phases of remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report/s shall include the details of the phases of remediation works and their verification to show

that the works for each phase have been carried out in full and in accordance with the approved methodology.

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

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

WASTE STRATEGY
Please can a swept path analysis be provided for the turning of the collection vehicle once it reaches the service yard and waste collection location? Will there be any height restrictions in place to cause missed collections.

Regarding the residential developments, is there a waste strategy for this? Please demonstrate using a site plan where the refuse stores will be located in the residential blocks, how many containers will be in each of the bin stores and also please ensure that sufficient space is available for food waste units to be installed in the future. Please show that there is less than 10M distance between the bin store and the location where the waste collection vehicle can safely stop for each block and also a swept path analysis of the route it will take and where it will stop for collections.

How many residential units will be in each block and how many bedrooms are in each of these flats?

There should be no barriers to collection and dropped kerbs should be accessible to complete the collection.

Case Officer comments:
The applicant has provided a plan showing the swept path analysis as requested (drawing no. THHR_01-MMD-XX-XX-DR-U-1103 Rev C01) which has been shared with the Waste Management Officer and confirmed as acceptable. The drawing shows turning movements for a 12m rigid vehicle accessing the waste collection location, this vehicle being chosen to represent, and be more onerous than, the likely largest 30 yard roll on roll off skip lorry likely to be used. In terms of the residential element of the development, this falls under Phase 2 of the application, which is in outline form only. Therefore, the Local Planning Authority would receive these details at Reserved Matters stage, when the Waste Strategy Team will be reconsulted. A Delivery, Servicing and Waste Management Plan condition to cover all phases of the development is also recommended to be attached to any grant of planning consent.

NOISE AND ODOUR SPECIALIST
A noise report has been submitted in support of the application ref. THHR_01-ACM-ZZ-XX-RP-Y-000025 dated 8 April 2022 which has been reviewed. The assessment considers the likely impact of the construction and operation of the proposed development on the existing environment and to some extent conditions inside the proposed development. The assessment refers to recognised methodologies including BS4142, DMRB and sector specific guidance. It appears that the proposed development will include plant and equipment that would be designed to operate on an emergency or standby basis, for example if mains electricity failed. It is recommended that no objection is made on noise grounds subject to suitable conditions hence:

'For the lifetime of the development hereby permitted the rating level of noise caused by the operation of plant, machinery and equipment 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 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'

'For the lifetime of the development hereby permitted the rating level of noise caused by the operation of emergency plant, machinery and equipment shall no more than 5 dB above the minimum background noise level, or 45 dB(A), whichever is higher, measured 1 metre outside of any window of any 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'

Prior to demolition and construction starting on site, and allowing sufficient time for any statutory determination period, an application should be made to the Council for prior consent under Section 61 of Control of Pollution Act 1974. This shall include descriptions of best practicable means to control noise and vibration, monitoring arrangements and community engagement that will be used.

ACCESS OFFICER
Full planning permission is sought for a new Hillingdon Hospital, multi-storey carpark and mobility hub, vehicle access, highway works, public open spaces, and ancillary services and plant equipment: Outline approval for up to 327 residential units with 302 parking spaces also forms the part of this proposal.

A development of this size and scale is subject to compliance with London Plan Policies D1, D5, D7, D12, S4 and T6.1:

A primary reason to re-develop the Hillingdon Hospital site is to make optimal use of the site to develop a hospital that can deliver the expectations of staff and patients in an environment that is modern and otherwise fit for purpose. Many of the ancillary and single storey ward buildings date back to the Second World War, most of which are tired looking and woefully outdated from an accessibility viewpoint.

The supporting Design & Access Statement has been reviewed with particular attention given to accessibility provisions outlined on page 196.

However, to ensure the new hospital and residential development is fully accessible to everyone, including older and disabled people, and people with complex/multiple disabilities, the following matters require clarification or amendment to the scheme:

1. Although the hospital has good bus stop links and is accessible by route U1, U3, U4, U5, U7, a convenient 30 minute drop-off point (free of charge) should be shown on plan for people arriving by door-to-door transport services (such as Dial a Ride and taxi vehicles which can be used when visiting a patient). The provision should be made available for the hospital and residential elements and located within 40 m of the main entrance(s). Details are requested.

2. All pedestrian routes, including the proposed boulevard, should ensure a streetscape design that is compatible with BS 8300:2018. Paving slabs must be selected and installed in accordance with section 8.4 of this British standard.

3. A landscaping strategy for the intended green roofscapes should detail the accessibility provisions, to include pathway surfacing, seating and play space.

4. The new hospital building should be designed and fitted to accord with the principal and spirit of

London Plan policy D5. The hospital, its facilities and services should cater for wheelchair users, including those with multiple complex disabilities, for whom disability is an everyday norm. The hospital should:
a. Provide ceiling track hoisting equipment within examination rooms, treatment rooms, and other areas where a patient would be expected to transfer from their wheelchair.
b. A Changing Places cubicle should be provided somewhere central with the hospital. It would be preferable to provide more than one facility across the site.

5. The residential element of the masterplan should ensure:
a. An accessible parking bay should be allocated to every M4(3) wheelchair unit
b. 10% of the development meets the standards for M4(3) Category 3 - wheelchair user dwelling. The units should be interspersed throughout the development, to include all typologies and tenures.
c. The affordable units should be suitable for 'day one occupation' by a wheelchair user. These units should be designed and fitted as per the prescribed standards for a Wheelchair Accessible M4(3) unit, as set out in ADM 2015.
d. Where lift access is necessary to achieve a step free approach to the principal private entrance, all M4(3) units should be served by at least two lifts.
e. A floor plan at no less than 1:100 should be submitted for each of the different M4(3) units. All details, to include transfer zones, wheelchair storage area, and other spatial requirements within bedrooms, bathrooms, living and dining areas, should be shown on a separate plan for every different unit type.
f. All remaining units must be designed to the standards for Category 2 M4(2) Accessible and Adaptable dwellings, as set out in Approved Document M 2015.
g. Any full planning application would need to provide details of the materials palette, with particular attention given to the paver types intended for use within the public realm. A methodology statement would be required to ensure that all materials could be installed in accordance with the tolerances set out in BS8300:2018.
h. All new developments are required to ensure reliable, convenient and dignified means of escape for all building users in accordance with London Plan policy D5 and D12. Accordingly, where lift access is provided, at least one lift per stair core should be capable of being used as an evacuation lift in compliance with BS EN 81-20 and BS EN 81-70.

11. A landscaping strategy for any intended roof gardens should detail the accessibility provisions, to include pathway surfacing, seating and play space.

12. Details should be required on the accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities. Provisions could include outdoor sound tubes, colour and lighting canopies, and other play equipment that could stimulate the olfactory senses. Inclusive play is a key requirement of any new residential development.

i. A comprehensive Design & Access Statement should support any future planning application, demonstrating how the principles of inclusive design have informed the design from the inception stage.

Conclusion: further details are requested at this stage on the hospital element of this proposal. Any Outline approval of the residential component should ensure that all accessibility matters are reserved.

OFFICER COMMENT: Further information has been submitted and subject to the imposition of conditions, there are no further objections.

DESIGN AND CONSERVATION
The proposals have been discussed at pre-application stage under applications 4058/PRC/2020/85 and 4058-PRC-2020-230 where detailed design advice has been provided at relevant stages of the

design development process.

There is a need for a new hospital in Hillingdon, given that the life of the Hillingdon Hospital estate has largely expired and is in an extremely poor condition. It is proposed that the new hospital would provide the same range of services that are currently available at the existing hospital, but in a high quality, purpose-built facility.

The development seeks to make optimal use of the land through comprehensive redevelopment to deliver a hospital that improves both the experience of patients and staff. This will also allow the rest of the site to be redeveloped for a residential led scheme that also supports commercial, business and service within the area.

The Site and Surrounds
The Hillingdon Hospital application site is 9.5 hectares in area and is located within an urban area of Hillingdon that is situated south of Pield Heath Road that is bound to the west by Royal Lane and to the east by Colham Green Road.

The existing hospital delivers healthcare services to around 5000,000 patients a year who are not only located within the London Borough of Hillingdon but also those living in the surrounding areas of Ealing, Harrow, Buckinghamshire and Hertfordshire.

The existing Hillingdon Hospital site has an eclectic mix of buildings dating from the 1940s. The main hospital building was built in the 1960s and is situated towards the centre of the site and dominates the local area at 10-storeys. A mix of other hospital buildings are scattered across the area interspersed with surface level car parking and pockets of landscaping.

The site has been developed on an adhoc and piecemeal basis since the 1940s rather than being planned based and on the needs of the hospital at different times. It is understood that the condition of most of the buildings (81%) are now classed as either poor or bad and that the continual upkeep of the buildings is a huge ongoing cost that is impacting on the quality of care that can be given to patients.

The vast majority of buildings on site are functional hospital buildings of little or no architectural or historic interest. No objection would be raised to their demolition in principle subject to a high-quality replacement scheme. The buildings in their current condition generally detract from the visual amenity of the local area and would not be regarded as non-designated heritage assets.

Notwithstanding the above there is a listed building (The Furze grade II) located on the eastern side of the site adjacent to Colham Green Road. This former country house dates from the early C19 and is of architectural and historic interest. This building is to be retained and there are currently planning and listed building consent applications for the repair of the building along with sympathetic alterations to provide an Adult Audiology Haematology, Education Centre and Clinical Admin Offices

There are also other heritage assets in the locality close to the development site that include Hillingdon Village Conservation Area to the north and Cowley Church Conservation Area further to the west which contain statutory as well as locally listed buildings. Also, to the east of the site, on the corner where Colham Green Road meets Pield Heath Road, is the grade II listed former Prince of Wales Public House.

The site's immediate context is predominantly 2-3 storey suburban houses and flats with the exception of the 4-storey late 20th century flats to the north side of Pield Heath Road that provides access into a residential Cul-de-Sac. The Hillingdon Estates Department is located north of this Cul-de-Sac and its incinerator can be seen in longer distance views due to the structures being taller than the surrounding buildings.

To the west of the site along Royal Lane and beyond can be found traditional two-storey detached, semi-detached and terraced housing with tiled pitched roofs and traditional facing materials of brick and render. Similar properties are also found directly to the south covering an extensive area.

Within these housing estates can be found large areas of green recreational space including Pield Heath to the west and Colham Green Recreational Ground to the east along with areas of Green Belt land.

The Proposed Development
The hybrid planning application proposes to redevelop the site with the demolition of existing buildings and the erection of a new hospital, multi-storey car park, mobility hub, commercial floorspace and 327 residential units. As outlined under the Background above this is a hybrid planning application which has a detailed planning application for the new hospital and an outline application for the residential led development to the central and western parts of the site.

The detailed planning application will see the demolition of existing buildings (excluding the Tudor Centre and the Old Creche) for the erection of a 7-storey (plus ground and basement) hospital that will provide 79,604 sq.m. of floorspace. It is also proposed to erect a 4-storey (plus ground) Multi-storey Car Park that would contain 23,304 sq.m. of floorspace, with a mobility hub at ground floor. This would provide 942 car parking spaces and 336 long-stay and 56 short-stay cycle parking spaces. Other associated works will include vehicle access, highways works, associated plant, generators, substation, new internal roads, landscaping and public open space, utilities, servicing area, surface car park/ expansion space.

The outline planning application will see the demolition of the remaining buildings on site excluding the Grade II Listed Furze for the erection of 3 blocks up to 6, 7 and 8 storeys to provide a maximum of 327 new residential units and 800 sq.m. of commercial floorspace (Class E). The development would also provide up to 302 car and 502 cycle parking spaces and associated refuse storage, landscaping and amenity areas and associated servicing.

The application site currently contains the Busy Bees Nursery, which is to be demolished to facilitate the new hospital. A separate planning application (LPA reference number 76613/APP/2022/37) was submitted in January 2022 for the demolition of modular buildings on the site and erection of anew 2-storey nursery. This application is still under consideration.

Layout and Positioning
It is necessary to construct a single-phase new build hospital on the existing hospital site. To enable this to happen the area available to build is defined by the need for the existing hospital to always remain operational during the construction period. The only area large enough to accommodate the new hospital is on the western part of the site adjacent to Royal Lane. This has required a detailed and complex phasing strategy to be developed. This can be viewed within the applicant's Design and Access Statement. Although this approach results in a big constraint on site it is the only realistic option to provide a new hospital whilst also maintaining the same level of essential patient care throughout the construction phase.

The hospital and car park have a simplified rectilinear footprint that runs north south and is set back behind generous landscaping along the Royal Lane frontage. A pedestrian link has been provided between the hospital building and the multi storey car park improving permeability though the development and link through to the reserved matters part of the site to the east.

On the campus side the main entrance is in the northeast corner as close as possible to Pield Heath Road and public transport. The entrance to the emergency department is located to the south in a two-storey height volume protruded towards the central green spaces.
The proposed multi-storey car park that serves the hospital is located in the north-western part of

the site separated by a wide pedestrian link above which sits a fully glazed link bridge connecting the MSCP to the ambulatory floor of the new hospital.

In addition to creating new routes for walking and cycling that would improve permeability through the site the proposed layout would also positively contribute to the street scape by providing activate frontages along Royal Lane and Pield Heath Road.

The application is supported by a Design and Access Statement (DAS), which comprehensively sets out the design for the detailed element of the application.

The outline planning application (all matters reserved, except for access) for the central and western parts of the hospital site are covered within the Design Guidelines (DG) document and a parameter plan which provide a basis for assessing future Reserved Matters applications in terms of layout, form and scale, residential quality, massing and articulation, access, inclusive design and appearance.

The master plan and the Design Guidelines Document for the reserved matters part of the site is broadly supported although it is acknowledged that aspects of this may change once detailed proposals are progressed at a later date.

The layout is mainly influenced by the phasing approach and the constrained nature of the site and the need to keep the existing hospital operational whist the new hospital is built. The layout and position of the Hospital and multi storey car park is, therefore, supported.

Height, Scale and Massing
The hospital building at 8 commercial storeys along with the multi-storey car park and mobility hub would be substantial buildings that would be seen prominently within immediate, mid-range and panoramic views. The buildings would be seen in contrast to the much smaller suburban housing that surround the hospital site which are predominantly 2-4 storeys in height.

The Townscape Visual Impact Assessment has looked at a number of views the locations of which were agreed with the local authority. The impact of the development on the townscape can be appreciated within Views 6, 9, 10 and 11 Royal Lane, View 21 Bryony Close, View 2 from Philpots Farm Green Space and View 8 Apple Tree Avenue where the strong contrast with the suburban housing can be seen.

The height of the building is determined by the requirements of the hospital and how it functions. The form is intrinsically linked to the layout. A stack of "T" shaped joined wards to the west and a linear north-to-south volume to the east form the basic mass of the new hospital.

The massing has been concentrated as far into the site as the constraints of a single phase rebuild will allow.
The hospital accommodation is provided across eight floors above ground and one below. The floor-to-floor heights take into account the requirements for the installation of extensive and specialist services. Ceiling heights are therefore around 3 metres. This allows for future changes should the hospital require modernisation at a later date.

The building profile and silhouette is staggered and setbacks are used to provide both articulation and layering of the facade along with material changes. This has helped to promote a more human scale with particular attention to Royal Lane to ensure that the building would contribute positively to the skyline as well as the streetscape.

The Design and Access Statement and the Design Guidelines document set out a series of tall blocks for Phase 2. These blocks would also positively contribute to the skyline forming a cohesive

development across the whole of the site. The distribution of the height of the tall buildings across the site (west to east) appropriately steps down in scale to respond to adjacent buildings and The Furze (listed building). This approach is considered appropriate and is supported.

Design

Main Hospital Building
It is proposed that the hospital building will be constructed from a palette of high-quality materials that will reflect the landmark status of the new building. The materials selection and detailing has been carefully chosen for their durability, sustainability, low embodied carbon and low maintenance. The simple palette of materials will comprise four principal materials that include brick, architectural concrete, glazing and metal. The design detailing and choice of material responds to the townscape. The approach to the architecture and various shades and textures help to break up the perception of bulk and ensure that the public facing edges are legible and of a human-scale.

The west wing of the building, facing Royal Lane will have a unified brick facing with a regular expressed facade grid providing visual interest, depth and articulation. The projecting three western 'wings' would be constructed in lighter contrasting brick that would complement the red brick of the principal block. The elevations would be further broken up with full height windows with wood effect panels and bronze metallic reveals.
The east wing of the new hospital has a two-storey brick facing podium on top of which rests a four-storey element covered with a light beige architectural concrete. The panels will add interest to the facade along with the chamfered window reveals that would be interspersed with the metal bronze-coloured grilles.

The setback top storey would make a positive contribution to the skyline and provide the building with a clearly defined 'top'.

The principal public entrances and areas are clearly defined and are celebrated on the elevations with the inclusion of large glazed areas with curtain walling helping to create active frontages.

Multi Storey Car Park
The facades of the multi storey car park are primarily of brick and are articulated through the alternation of opaque and perforated vertical slots that help to break up the elevation and add visual interest.
The opaque slots are made of red brick matching those used in the new hospital facades whereas the perforated slots present multicoloured terracotta extrusions and architectural metal mesh.

The north, east and west facades will primarily comprise openings with perforated metal cladding which allow the car park to be naturally ventilated.

The materials and detailed design of the facades have been discussed at length during the pre-application process. Architectural concrete was queried at an early stage given the potential for staining and concerns over its poor appearance over time. The applicant's architect has considered recent developments that have used the material, looking at the detailed design of the facades, their performance over time and in particular weathering details to ensure water will not run down the face of the building. These studies can be seen within the Design and Access Statement.

I am now satisfied that with the new architectural concrete products on the market and detailed consideration of the weathering, the material could be supported.

No objection is raised to the design of the buildings or the choice of materials which will provide an attractive appearance of a human scale that responds well to the area.

The detailed design of the building, the choice of materials and the quality of workmanship will be important factors in the success of the scheme and should be controlled by relevant conditions should the application be minded or approval.

Setting of Heritage Assets

As stated under the Site and Surrounds sub-heading the application site is situated near to two conservation areas that contain both statutory and locally listed buildings. There are also two statutory listed buildings with The Furze (Grade II) on the eastern part of the development site and the Prince of Wales Public House (grade II) further to the east on the junction where Colham Green Road meets Pield Heath Road.

The application has been accompanied by a detailed Heritage, Townscape and Visual Impact and Tall Building Assessment. The assessments are comprehensive and help to determine any potential impacts on nearby heritage assets.

Hillingdon Village Conservation Area is situated to the north of the development site and contains the original village of Hillingdon. The area contains a number of statutory listed buildings, including the Grade II Bishopshalt Grammar School, Grade II Cottage Hotel, Grade II* Church of St John. Grade II* Cedar's House and the Red Lion Public House grade II. The majority of the statutory and locally listed buildings are situated within the northern part of the Conservation Area with only Bishopshalt Grammar School in the southern part. It is considered that the conservation area and the statutory and locally listed buildings are of a sufficient distance away from the proposed development site that there would be no harm to their significance.

Cowley Church Conservation Area is located to the west of the application site. It also contains a number of statutory and locally listed buildings including the Grade II* Church of St. Laurence, Grade II Bell House and the locally listed 1 & 2 Manor Lodge. These assets are located with the northern most portion of the area with the majority of the conservation area to the south comprising undeveloped open space until it reaches the buildings of Manor Farm to the south.

In assessing the easterly views within Heritage, Townscape and Visual Impact Assessment in particular views 1and 2 the current and proposed views of the hospital would be seen. It is considered that given the current views of the existing hospital and the proposed development there would be some visual change, however, given the distance between the heritage assets and the hospital the extent of change would not result in any harm to the significance of the Cowley Church Conservation Area.

The Furze is a grade II listed building located on the eastern side of the Hillingdon Hospital site adjacent to Colham Green Road. This former country house dates from the early C19 and is currently in a poor condition and has been included on the Heritage at Risk Register 2021 as compiled by Historic England. The building has been extended unsympathetically in the past with large 20th century rear extensions. The original house, however, is still clearly discernible with a white painted render frontage and other features such as a hipped slate roof; French windows with architraves; a double hung sash central window; rusticated Roman Doric 1/2 column and pilaster on either side of central ground floor window; and an entablature at 1st floor level. The former house also retains a substantial amount of original internal architectural decorative finishes which add to the building's special interest along with a substantially intact floor plan.

There are currently planning and listed building consent applications to repair the building and undertake alterations for the building to provide an Adult Audiology Haematology, Education Centre and Clinical Admin Offices. The project is a key part of the decant project of the overall scheme to enable demolition and redevelopment of the new main hospital. This application is currently under consideration (See application 4058/APP/2021/3651).

Taking into consideration the location of the heritage asset in relation to the proposed buildings and the existing setting, which does not contribute to its significance, no harm would be caused to the significance of The Furze.

The Prince of Wales Public House which is also grade II listed. It was built in the late eighteenth century and is now currently used as a restaurant. The building is two storeys in height with architectural features such as a hipped slated roof, painted brick walls, vertical sliding sash windows with glazing bars in exposed moulded frame and three canted bays. The building is situated on a prominent corner site where Colham Green Road Meets Pield Heath Road and is one of a few remaining historic buildings within the area of the pre-urbanized village. For similar reasons as the Furze it is not considered that the development would cause harm to the heritage asset.

Having looked at the detailed assessments contained in the Townscape Appraisal and Heritage Statement and having visited the above heritage assets it is not considered that the development would cause harm and the proposals would accord with the relevant paragraphs in the NPPF and local plan policies in relation to heritage assets.

Conclusion

The proposed layout, height and mass of the hospital and multi storey car park are supported given the constraints on site and the need to keep the existing hospital operational whist the new hospital is built.

The design of the scheme is generally considered to be of a high standard and responds well to its context. The approach to the architecture and various shades and textures of the materials will help to break up the perception of bulk and ensure that the public facing edges are legible and of a human-scale.

The proposed development would provide an improvement on the existing adhoc hospital development providing a cohesive and better quality of design and layout that introduces public accessible green space.

I am satisfied that the development would not have a harmful impact on the setting or significance of any nearby heritage assets.

Should the application be minded for approval then I would be happy to suggest conditions for the submission of further details, materials, sample panels and landscaping etc.

ECONOMIC DEVELOPMENT
From an Economic development perspective the proposed redevelopment of the hospital is welcomed. The estimated project budget, at over £600m, is a significant and welcome level of investment.

The re-development of the hospital site serves to offer a range of new opportunities, the challenge for all involved is to maximise the impact of the new hospital in terms of jobs for residents and contracts for Hillingdon based businesses.

The Socio Economic report supporting the planning application provides a detail analysis of the positive impact the development will have on the local economy both during the construction phase and once the development is complete. This analysis appears to be well constructed and realistic.

Over the four and a half years of the development it is anticipated that the construction phase will create 547 jobs both onsite and in support services. This will obviously provide a boost to both local employment and offer the opportunity for residents to acquire skills and experience during the

construction phase. The challenge will be to ensure that residents have the experience and skills required and that there are clear pathways and support to ensure that the jobs and training positions created are accessible. To this end the Council's Economic development officers supported by Qualify Me the Council's Construction coordination support service will work closely with the appropriate contractors and local partners, such as Harrow College Uxbridge College (HCUC), Build training and job Centre Plus to ensure that where possible the opportunities are taken by local residents. The larger the proportion of jobs and training positions that are taken by local residents the higher the bigger the financial impact on the local economy as highlighted in the Socio Economic report will be.

As well as direct employment during the construction phase, the development offers local business opportunities in supplying goods and services during the construction and fit out stages. As with the construction training, Economic development officers will be looking to work with the main contractor to identify opportunities for local business and encouraging contractors to promote access to contracts via focused seminars and events. There is also an opportunity for the developer and contractor to showcase opportunities through Hillingdon EXPO and similar events promoted by Hillingdon chamber of commerce.

Once the development of the hospital is complete the Socio Economic report advises that the number of employment opportunities will increase by around 750. Whilst a breakdown of the areas where employment opportunities will increase is not detailed, the increase in employment opportunities is welcomed, as is the anticipated new quality working conditions. It is assumed that the newly created positions will be a mixture of health professionals and support services. Given the shift patterns worked by the NHS the jobs at the hospital are likely to in the main attract residents from Hillingdon. The challenge will be both ensuring residents have the skills and experience to take the positions and that the salaries on offer match residents expectations.

EQUALITY AND WELLBEING MANAGER
The Council's Equality and Wellbeing Manager has reviewed the submitted assessment and confirmed that it is acceptable.

SUNLIGHT DAYLIGHT AND OVERSHADOWING CONSULTANT (Summary)
We are generally in agreement with the approach, scope and methodology used. While we may have emphasised the significance of the losses in a few isolated cases more than Point 2 we are in agreement with the conclusion that the neighbouring properties will be left with good levels of daylight for a typical sub-urban landscape.

With regard to sunlight, AY recommend that the results for properties 7-12 Bryony Close are appended to the report for review. AY are in agreement with the Point 2 conclusion that the development presents a very high degree of sunlight compliance.

ENERGY OFFICER
The energy statement (THHR_01-ACM-ZZ-XX-RP-Y-000019, Aecom, April 22) identifies two parts to the development: the Hospital Redevelopment and the 'Masterplan Development'.

The two schemes are being assessed as interdependent as there is no technical link between the two in relation to energy. Each part should aim to achieve the zero carbon requirement in accordance with London Plan Policy SI2; this includes a minimum 35% saving onsite with a minimum requirement through energy efficiency measures [15% non-residential; 10% residential].

Hospital Redevelopment
The Hospital Redevelopment does not meet the policy requirements in relation to both the minimum energy efficiency requirements and the minimum total onsite carbon savings. The energy statement identifies a total saving of 31% and is therefore not policy compliant.

If the application is minded to be approved then the following needs to be considered:
The 31% onsite CO2 savings results in a shortfall from the zero carbon target (2,324tCO2) of 1,597.7tCO2/annum equating to a cumulative shortfall of 47,930tCO2 over 30years (the time span for calculating the operational carbon footprint of a development).

In accordance with Policy Si2, any shortfall from the zero carbon target should be delivered through either a) a cash in lieu contribution to the Council's Carbon Offset Fund or b) off site provided an alternative proposal is identified and delivery is certain.

Although the policy states either (a) or (b), realistically a combination of both would be considered if this results in the optimum approach to carbon savings.

The cash in lieu contribution to be secured through a S106 would be: 1,597.7 x 30 x £95 = £4,553,445

The extent of the contribution is significant. A sizeable contribution was assumed to be required through the pre-application process although no energy assessment was available to comment on until submission of the planning application. It was agreed during the process that simply handing a large sum of public money from the NHS to the Council would not be the optimum solution and that an alternative offsite option would be pursued within the NHS estate. Mount Vernon Hospital in the north of the borough was identified as a possible receptor site for improvements (i.e. the receptor site for carbon offsetting) which would result in the NHS funds being retained within their property portfolio to save the Trust operational expenditure.

Unfortunately, no strategy has been forthcoming on the offsite solution which is disappointing as it represented a positive opportunity to earmark the offsite solution that would assist the NHS.

This proposed solution by the Council still represents the ideal option although delivery is less certain without even a broad strategy approach indicating viability. In lieu of a broad strategy, the S106 must include an energy schedule that contains an opportunity to realise an off-site solution together with a time limited clause to secure an alternative cash in lieu contribution to the Council in accordance with Policy SI2.

In addition to a condition requiring the development to proceed in accordance with the approved energy strategy the principles set out in the draft S106 schedules below should be secured:

Masterplan Development
The Masterplan Development set out in the energy strategy (THHR_01-ACM-ZZ-XX-RP-Y-000019, Aecom, April 22) identifies a total 60% onsite savings with the appropriate energy efficiency savings for residential and non-residential. This part of the development is policy compliant. However, it is recognised that this is an outline part of the submission and will come in the medium term. Consequently, the broad approach set out in the energy strategy may change with different technologies, delivery ambitions, orientation and design of the development.

The following condition and S106 requirement is therefore necessary:
Condition
Prior to commencement of development, a detailed energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (April 2020 or as amended). The assessment shall clearly identify the baseline energy demand and associated carbon emissions in accordance with the prevailing building regulation requirements. The assessment shall then 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. Where the measures do not collectively contribute to a zero carbon saving (noting a

minimum requirement of 35% saving onsite) to the agreement of the Local Planning Authority, the report shall set out (a) the 'onsite saving' and (b) the 'shortfall'; both to be presented in tCO2/annum.

The 'shortfall' shall then be subject to an offsite contribution in accordance with the London Plan Policy SI2.

The Energy Assessment shall also provide details of the 'be seen' recording and reporting measures to be agreed in writing by the Local Planning Authority. The 'be seen' measures must comply with the requirements of London Plan Policy SI2 and demonstrate that the 'onsite saving' is be achieved.

The development must proceed and be operated in accordance with the approved details.

Section 106 Requirement
On commencement of development (including demolition), the shortfall (where applicable) identified in the Energy Assessment required by Condition [energy] shall form a cash in lieu contribution to the Council's carbon offset fund at £95/tCO2 annualised over 30 years (i.e. shortfall x 30 x 95 = £contribution).

LANDSCAPE ARCHITECT
The proposed landscaping is a considerable improvement on the existing situation. Officers have worked with the NHS to maximise the space available for soft landscaping away from the operational elements of the scheme and this is broadly reflected in the design.

Similarly, the landscaping at the Royal Lane frontage adjacent to the Hospital will provide a positive setback and an engaging frontage that will be an improvement over the current situation.

There are concerns that the landscaping will become threatened by an expanding hospital to accommodate further servicing areas. The existing hospital has no such areas of space for convalescence, resting or relaxation as it has been consumed by operational requirements and sprawl. The new hospital addresses the lack of landscaping through the plans; however, concerns remain around the servicing area and whether this is sufficient to manage the requirements of an operational hospital.

Although the landscaping proposals presented are generally positive, there is no excess that would allow areas to be lost to extend servicing. The development must provide landscaping in accordance with any approved plans (subject to comments below) and maintained in perpetuity and not lost to permitted development or operational sprawl.

Area to the South
The area to the south of the site (east of the FM yard, south of the surface car park) requires further development. This area will be one of the more 'natural' parts of the new development and will be a key resting/convalescence area. Only 4 benches are shown in this area and there is an open stretch to the west along the ambulance only route with the footpath immediately adjacent to the road.

This open space area could be better contained with denser planting (i.e. a hedgerow) providing a natural buffer to the road with the pathway inside the open space area. There is also an excessive array of footpaths which reduces the ability to increase the seating areas and add vegetation. The area could become better protected from the operational road network providing a more hospitable environment with an improved use of vegetation through the realignment of the footways.

Area between the MSCP and Royal Lane
As discussed with the planning agents during the application process, there are concerns regarding the limited level of soft landscaping in this location. Soft landscaping was previously proposed to

soften the visual impact of the MSCP and this needs to be reintroduced.

Hospital Boulevard
TfL have provided the following comments, which are supported. The scheme will need to provide amended landscaping/surfacing details in this location:
'It should also be ensured that the route between Pield Heath Road, and the bus stops located on it, and the main hospital entrance is of a high-quality and attractive at all times of the day. This will be a particularly important route during the earlier phases of the development. It is considered that the applicant should relook at this route, with a view of implementing design measures to improve the pedestrian experience and support creating an attractive, comfortable and all-inclusive environment.

Conditions (separate)
A - Prior to above ground works, a landscaping plan for the detailed element shall be submitted to and approved in writing by the Local Planning Authority.
The plan shall include sufficient seating and convalescence area as well as a redesigned/realigned footpaths (where feasible) that are separated from the operational road network through the use of denser planting (i.e. hedgerows). The development must proceed in accordance with the approved plan and retained in perpetuity.

B - Standard condition relating to planting mix.

C - Standard landscape condition for the 'Masterplan Development'.

D - The development must proceed in accordance with the approved landscaping plans. The landscaped areas must be retained in perpetuity. No areas subject to landscaping will be subjected to an alternative use unless otherwise agreed in writing with the Local Planning Authority.

COUNCIL HIGHWAY CONSULTANTS
WSP raised comments and clarifications through the Transport Assessment and associated documents and are satisfied that clarity and comment has been provided to the points raised.

The hospital site trip generation as reviewed in the TA is considered to be logical and reflective of a major redevelopment of a hospital, and provides a consideration of existing and proposed scenarios. Future scenarios also do take into account future measures for improved cycle accessibility, improved cycle parking, pedestrian connectivity and wayfinding, along with rationalisation of parking. The provision of a detailed Construction Logistics Plan as part of a post-planning condition is welcomed.

The applicant is advised to continue liaising with TfL with regards modelling, where necessary undertaking further review on the local network assessment across future stages of development as part of the VMAP process, to detail and review any concerns regarding residual traffic impact or operation at specific junctions. Mott MacDonald have noted this comment, and should duly liaise with TfL to satisfy any concerns of junction impact.

Subject to sufficient justification of any further comments raised by TfL with regards to trip-generation, and clarifications around any concerns raised with regard to residual traffic impact or operation at specific junctions, the Transport Assessment and transport evidence base that has been presented is deemed to demonstrate acceptability in terms of traffic impact as a result of the proposals.

Key considerations that should continue to be monitored/evaluated in cohesion with the developer and the Council include the management of the decant and construction phase to ensure there is no impact in provision, and similarly moving through the initial phase where the hospital footprint is cleared and parking is relocated to the off-site temporary car park. Mott MacDonald have noted this

point raised through review of the Transport Assessment.

It is noted that several key design elements including the internal highways layout for bus access, detailed design of junctions, will be thoroughly assessed and reviewed further in the next RIBA Stage, and it is noted that a full delivery and servicing plan could and should be developed at a future stage prior to occupation of the proposed development. Both of these points are welcomed.

INTERNAL HIGHWAYS
Introduction
These highway comments relate to the cycling and Travel Plan elements of a part full part outline hybrid planning application to redevelop Hillingdon Hospital to provide a new 79,594sqm hospital building (GIA) plus 23,034sqm of multi-storey car park, 327no. residential units and 800sqm of commercial floorspace. Hillingdon hospital is situated approximately 2km north of West Drayton and 2.5km south of Uxbridge. The application site is situated in a residential area and bordered by Pield Heath Road to the north, Royal Lane to the west, Colham Mill Road to the east. The southern boundary is formed by the back gardens of residential properties fronting onto Bryony Close, Appletree Avenue, Campion Close and Lavender Road. Parking along Pield Heath Road is controlled by double yellow lines with the other roads mentioned being part of Parking Management Scheme HH where parking is restricted to permit holders only 9am to 5pm Monday to Friday.

There are currently 154no. cycle parking on-plot spaces of which 40no. are secure and allocated for staff and 114no. unsecure spaces for visitors. There is also a 10no. space Brunel University Santander Bicycle Hire docking station.

Proposed internal cycle routes
There would be three main cycle routes within the new hospital campus. These include a 6m wide shared pedestrian/cycle footway along Pield Heath Road, an "internal hospital link" connecting Pield Heath Road with Colham Green Road via the main entrance plaza and a central "Green Corridor".

The shared pedestrian/cycle footway along Pield Heath Road would be 6m wide and link the Pield Heath Road junction with Royal Lane to the Pield Heath Road junction with Coldham Green Road.

The "internal hospital link" would run in a north south alignment through the hospital campus linking Pield Heath Road with Colham Green Road via the main entrance plaza, a bus service would use this route. A 3m wide shared pedestrian/cycle footway would be provided on one side throughout. This is supported.

The central "Green Corridor" would pass through the centre of the site linking Colham Green Road with the main entrance plaza. Along this central "Green Corridor" would be a triangular area of public open space. This would be a route for both pedestrians and cyclists but given that the central "Green Corridor" and the triangular area of public open spaces are being provided as a place for people to relax and enjoy fresh air, measures are proposed to calm the speed of cyclists. Allowing cyclist to use this central "Green Corridor" but with measures to prevent high speed cycling is supported.

A bicycle allows the rider to end their journey very close to their intended destination, if cycle parking is not provided, they will fly park their bicycle by locking it to street furniture or just laying it on the ground. A bicycle that is fly parked can make an area look cluttered present a tripping hazard. To guard against fly parking the Highway Authority require that short stay parking - Sheffield stands are provided along the central "Green Corridor" adjacent to the triangular area of public open space.

Number of cycle parking spaces proposed
Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London

Plan 2021 Policy T5 Cycling provides the minimum cycle parking standards, for a hospital these are 1no. long stay space per 5no. full time employees (FTE) and 1no. short stay space per 30no. FTEs. On the basis that the hospital would have 1,676no. FTE staff on-site in any given 24-hour period, the applicant would be required to provide as a minimum 336no. long stay cycle parking spaces and 56no. short stay spaces.

The development would be in accordance with these standards, the long-stay cycle parking would be provided in the form of two-tier cycle storage racks. These will be located on the ground floor of the MSCP, accessible from the northern side of the building. These spaces are considered secure as access to these spaces would be controlled by way of a key code or swipe card. Within the long-stay cycle parking area there would be a small cycle workshop area with tools and equipment for cycle maintenance, lockers would also be provided for cyclists giving the rider somewhere to store their change of clothes, shower facilities would also be provided. The provision of these facilities is supported, however there should be scope for alternative types of cycle parking provided within the long-stay cycle parking.

The short stay cycle parking will be provided in the form of 28no. Sheffield stands with the capacity to accommodate 56no. bicycles. It is proposed that 20no. of the Sheffield stands will be located at the western end of the main entrance plaza. The remaining 8no. Sheffield stands would be located east of the multi-storey car park (MSCP). Three of these Sheffield stands will provide electric bike and e-scooter charging points. Whilst it is legal to buy and sell e-scooters, there are limitations on where they can be used. At present, e-scooters fall within the legal definition of a motor vehicle, this means they would need to comply with the requirements motor vehicles must meet in order to be allowed to drive on roads. E-scooters do not meet these requirements. The only exception to this is when e-scooters are rented as part of an official trial. The Highway Authority does not support the provision of active electric bike and e-scooter charge points at the proposal site until the law is changed and their use legally permitted. The active provision should therefore be amended to passive provision. This requirement should be secured by way of a suitably worded condition.

Brunel University Santander cycle hire scheme
The current Brunel University Santander cycle hire scheme would be retained; the docking station would be located east of the MSCP near the main entrance plaza junction with Pield Heath Road. The Brunel cycle hire scheme is operating successfully and the network of docking stations is steadily growing, docking stations have recently been installed in West Drayton town centre, there are plans to provide a docking station at the new West Drayton Elizabeth Line railway station. To allow Brunel cycle hire scheme network to expand in the vicinity of the hospital, the Highway Authority require that land is reserved for the future installation of docking stations in response to demand. The sites for future Brunel cycle hire scheme dockings stations should be at the new shared pedestrian/cycle accesses required off Royal Lane, at the intersection of the central "Green Corridor" access off Colham Green Road and within the triangular area of public open space. The locations to be secured for the future provision of Brunel cycle hire docking stations should be secured by way of a suitably worded planning condition.

Enhanced external cycle routes
As part of the planning application the applicant has identified 3no. cycle routes to the hospital that could benefit from investment that would improve the safety and convenience of cycling along these roads. These routes would be:
1. From Falling Lane north along Royal Lane to the hospital
2. From the junction of Cleveland Road with Station Road west along Church Road and Pield Heath Road to the hospital
3. From Park View Road north along Colham Green Road to the hospital entrance leading off Colham Green Road.

To allow the applicant to deliver these external cycle routes themselves, the Highway Authority

require that the applicant enters a 1990 Town and Country Planning Act s.106 agreement with the Council obliging them to enter a 1980 Highways Act s.278 agreement to allow them to undertake works on the Council's highway.

Residential Cycle Parking
As mentioned above this is a hybrid planning application with an outline planning application to provide up to 327no. residential units and up to 800sqm of town centre uses, there would be 515no. cycle parking spaces to serve these uses. The published London Plan 2021 Policy T5 Cycling provides the minimum cycle parking standards, for a development of this type the standard for the residential element would be dependent on the mix of dwellings sizes proposed, these range from one space for studio and one-person dwellings, 1.5no. spaces for two-person dwellings and 2no. spaces for all other dwellings.

Though the type of town centre use and mix of dwellings proposed is not known, it is anticipated that c.515 cycle parking spaces would be appropriate. These details would be reviewed at the reserved matters application stage.

Hospital Travel Plan Framework
A Hospital Travel Plan Framework has been provided as part of the planning application, this has also been reviewed and also found to be satisfactory overall. However, the Highway Authority requires the Travel Plan to make a commitment to installing real time public transport information boards at the reception/foyer. Hospital staff and visitors are more likely to travel by bus if they are familiar with the service and route network and have access to live information regarding bus arrival times. This facility will be of particular use to people without access to the mobility app. As surety that the Travel Plan will be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered and the targets achieved the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a s.106 agreement. It the Travel Plan is successful the bond will be returned.

Residential Travel Plan Framework
Similarly, a Residential Travel Plan Framework has been provided as part of the planning application, this has also been reviewed and found to be satisfactory overall. The applicant will be required to undertake baseline travel surveys and target setting for years 3 and year 5 within 6no. months of the dwellings being fully occupied is required. As surety that the Travel Plan will be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered and the targets achieved the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a s.106 agreement. It the Travel Plan is successful the bond will be returned.

Conclusion
There are no highway objections to this proposal subject to the following planning conditions and s106 contributions.

Conditions/HoTs
1. A condition requiring the applicant to submit for approval preliminary designs of the three enhanced external cycle routes.

2. A requirement that the applicant to enter a s.106 agreement with the Council obliging them to enter a s.278 agreement to allow them to undertake works on the Council's highway.

3. A requirement that the applicant to enter a s.106 agreement with the Council obliging them to fund in full the cost of making any Traffic Orders needed to provide these external cycle routes.

4. A condition requiring the applicant to submit drawings showing a new shared pedestrian/cyclist access into the hospital from Royal Lane.

5. A condition requiring the applicant to submit drawings showing the location of sites to be reserved as future Brunel Cycle Hire docking stations.

6. No e-scooter active charge points should be provided on-site until it is legally permissible to use e-scooters on the public highway.

7. The applicant is required to undertaking residential baseline travel surveys and target setting for years 3 and year 5 within six months of the dwellings being fully occupied.

S106 Obligations/Contributions are required to mitigate the impact of the proposals, these are:

- A requirement that the applicant to enter a s.106 agreement with the Council obliging them to pay the Council a £20,000 bond as surety that the Hospital Travel Plan will be delivered, and the targets achieved.

- A requirement that the applicant to enter a s.106 agreement with the Council obliging them to pay the Council a £20,000 bond as surety that the Residential Travel Plan will be delivered and the targets achieved.

- A Wayfinding Contribution of £47,500 (£29,000 Phase 1 and £18,500 for Phase 2)

- A financial contribution of £18,000 towards additional cycle hire docking station facilities

- A financial contribution of £561,625 towards improvements to the Public Realm/Active Travel Zones.

Case Officer comments:
The financial contributions have been agreed by the applicant and are proposed to be secured in the s106 legal agreement.

AIR QUALITY OFFICER
The proposed development is located within the LBH Air Quality Management area (AQMA), and within Hillingdon Hospital Focus Area, originating air pollutant emissions which will add to current poor air quality in the area. Proposals are required to improve air quality within Focus Areas.

As per the London Plan and LBH Local Action Plan 2019-2024, developments need to be air quality neutral as minimum and air quality positive in Focus Areas, contributing to the reduction of air pollutant emissions in these sensitive locations. 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 of this size to be air quality neutral as minimum and air quality positive, actively contributing to reduce pollutant emissions to the atmosphere.

Outline Element Only

The Proposed Development includes 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. Details: Comprising a maximum height of 8 storeys, 79,594sqm of Hospital

Building (GIA) plus 23,034sqm of Multi-Storey Car Park, 327 residential units and 800sqm of commercial floorspace.

The proposed development is NOT air quality neutral for the outline application, with the traffic information available at this stage. Please note that these calculations are indicative only and that appropriate calculations are to be undertaken at the detailed stage when suitable traffic information becomes available. In the calculations undertaken 2027 was assumed as the opening year. Should the opening year be sooner, the damage cost will be significantly higher. It was also assumed that between 2030 and 2040 50% of the cars would be electric. Should this not be the case the damage cost will increase to £763,058. After 2050 all cars were assumed to be electric.

The outline application is for all matters reserved, except for access, and therefore air quality will be evaluated at the detailed stage, for each land use being considered (residential (Class C3) and supporting Commercial, Business and Service uses (Class E)). With the provided information it is not possible to reasonably ascertain the impact of the proposed development on air quality. In addition, given that the Transport Assessment report submitted to support the planning application has not provided trip generation information for Classes C3 and E separately, it is not possible to ascertain which mitigation measures are required to make the proposal air quality neutral for each class at this stage. Table 1 summarises the information available at this time used to calculate the damage cost for Air Quality Positive purposes.

Damage Costs and Mitigation Measures

Mitigation measures to reduce emissions are required due to location of the proposed development and 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 to be proposed by the applicant under the Air Quality Positive summary to be provided at the detailed stage will be evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall damage cost value due. When no quantification is possible, a flat rate discount is applied. Table 2 and 3 summarise the aspects of air quality and planning requirements for the proposed development, for the outline application.

The level of mitigation required to the outline phase of the proposed development for traffic emissions is £618,447 to £763,058, based on the assumptions stated above. It is noted that any air quality contribution for the outline element of the proposals is to be agreed at the detailed stage only so that that the applicant has the opportunity to offer suitable and appropriate mitigation which is not possible to be envisaged/designed at the outline stage of the application (this is in alignment with the Mayor of London Air Quality guidance and NPPF Practice guidance). The Section 106 agreement attached to any grant of planning permission will therefore need to capture the need for any contribution, whilst also enabling sufficient flexibility for the final level to be calculated once details are known. Once all mitigation has been agreed under the Air Quality Positive Statement at the detailed stage, the remainder will be accounted for under a S106 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.

The air quality neutral and positive status for the outline application will have to be also calculated at the detailed stage, as per the London Air Quality guidance (draft Air Quality Neutral and Air Quality Positive).

In addition, the following conditions will apply:

Low Emission Strategy
No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall be focused on making the Travel Plan ambitious and make full use of the PTAL of the application site, and secure building emissions are air quality positive and in alignment with the cleanest technologies in the market for backup generation production. It shall specify as a minimum the following:

1) A clear and effective strategy to encourage residents/staff to:
a) use public transport
b) cycle / walk to work where practicable
c) enter car share schemes
d) purchase and drive to work zero emission vehicles.

2) Provision of a clean supply of energy to the site.

The measures in the agreed scheme shall be maintained throughout the life of the development.

Reason
As the application site is within an Air Quality Management Area, a Focus Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 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 T4, and paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2021).

Reducing Emissions from Demolition and Construction

A - No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).
Reason: Compliance with London Plan Policy SI 1 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

B - All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases 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" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/."

Reason
Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

Detailed Application

The Proposed Development includes four diesel fired standby generators located to the south of the hospital building. With the exception of testing the generators are solely for emergency use and will not be used for commercial power generation. Excluding an emergency, the generators are anticipated to operate for up to 14 hours per year for testing consisting of, 1 hour per month for 11 months and 3 hours for one month. The London Air Quality Neutral draft guidance states that, "Backup plant installed for emergency and life safety power supply, such as diesel generators, may

be excluded from the calculation of predicted building emissions. Normally, it would be expected that the use of these generators for anything other than an emergency and operational testing (less than 50 hours per year) would be prevented by planning condition. "

Therefore, in this instance, the backup plant to be installed for life safety emergency power supply (diesel generators), have been excluded from the calculation of predicted building emissions.

The proposed development is air quality neutral for the detailed application. As the outline application is for all matters reserved, except for access, air quality will be evaluated at the detailed stage, for each land use being considered (residential (Class C3) and supporting Commercial, Business and Service uses (Class E)). Table 1 summarises the location constrains of the application site and proposed development for the detailed application and requirements that must be met once granted planning permission.

Damage Cost and Mitigation Measures

Mitigation measures to reduce emissions are required due to location of the proposed development and 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 to be proposed by the applicant under the Air Quality Positive summary will be evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall damage cost value due. When no quantification is possible, a flat rate discount is applied. Table 2 and 3 summarise the aspects of air quality and planning requirements for the proposed development, for the detailed phase.

Given the opening year of 2027, and due to the nature of the proposed development (hospital), the fleet composition can be easily managed through contractual procedures and was assumed that after 2030 the proposed hospital would be in full alignment with the Mayor's vision to have a fully electric London fleet after 2030.

The level of mitigation required to the detailed phase of the proposed development for traffic emissions and backup generator emissions is £1,998,515. Once all standard deductions were applied (at the discretion of the LBH planning officer), the remaining value of mitigation due is £19,985. Flat rate deductions applied are as follow: Travel Plan (20%), Green Sustainable Measures (5%), contribution to long term LBH strategic long-term strategies (e.g. multimodal shift) and or provision of Public services (74%), totalling a reduction of -£1,978,530.

To achieve an Air Quality positive status, negotiations are required between the applicant and LBH to devise and agree mitigation measures that will be acceptable to both parties. Table 3 offers four scenarios (Scenario 1, Scenario 2, Scenario 3 and Scenario 4) to be considered under the discussions to be held and the final agreed measures will be combined and reported under an Air Quality Summary Matrix to be uploaded in the system to support the planning application.

In the instance the air quality positive status is not achieved after negotiations mentioned above, a section 106 agreement with the LAP of £19,985 (or any fraction of it as quantified through the Air Quality positive calculations to be completed as part of the negotiations) 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.

The air quality neutral and positive status for the outline application will be calculated at the detailed stage when more detailed traffic information becomes available for the commercial use of the

residential led application.

Low Emission Strategy
No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall be focused on making the Travel Plan ambitious and make full use of the PTAL of the application site, and secure building emissions are air quality positive and in alignment with the cleanest technologies in the market for backup generation production. It shall specify as a minimum the following:

1) A clear and effective strategy to encourage staff to:
a) use public transport;
b) cycle / walk to work where practicable;
c) enter car share schemes;
d) purchase and drive to work zero emission vehicles.

2) Provision of a clean supply of energy to the site;
3) Retrofit the diesel backup generators with SCR
4) Presentation of declaration that the use of life saving emergency backup generators will be solely for emergency situations of power failure and operational testing (less than 50 hours per year)

The measures in the agreed scheme shall be maintained throughout the life of the development.

Reason
As the application site is within an Air Quality Management Area, a Focus Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 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 T4, and paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2021).

Emission Reduction and Management Plan
Prior to operation of the development, an Emission Reduction and Management Plan (ERMP) for the development, shall be submitted to and approved in writing by the Local Planning Authority. This shall outline and commit to a programme for carrying out a viability study to review emissions performance and alternative options for the diesel backup units, with clear time scales, to be submitted no later than year of operation 21. The viability study shall be based on the BAT (best available technology) principle giving weigh to sustainability principles and aligned with the objectives of the Borough on improving air quality. This shall include but is not limited to the following:
(i) A review of options for reducing NOx and PM2.5 emissions impacts for the National Grid power failures;
(ii) A review of options for reducing NOx and PM2.5 emissions for the testing regimes;
(iii) A review of options for reducing NOx and PM2.5 emissions by improved SCR systems /alternative retrofitting systems
(iv) A review of options for reducing NOx and PM2.5 emissions by alternative fuels
(v) A feasibility study including benefit analysis for potential upgrades of the backup generators or other changes to infrastructure (e.g. SCR), type of fuel, generator type and operational regimes on site that could reduce emissions over time; alternative emergency backup solutions are to be also evaluated, e.g. fuel cells, etc.
(vi) Use of the above information to propose appropriate changes in the generators type, selection of generators or other potential options for decreasing emissions over time no later than year 21; and
(vii) Proposal of an appropriate timescale for improvements.

Thereafter the development shall be implemented and operated in accordance with these details.

Reason

As the application site is within an Air Quality Management Area, within a LBH Air Quality Focus Area and in close proximity to sensitive receptors, and to reduce the impact on air quality in accordance 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(e), 186 and 188 of the National Planning Policy Framework (2021).

Reducing Emissions from Demolition and Construction
A - No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).
Reason: Compliance with London Plan Policy SI 1 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

B - All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases 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" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/."

Reason
Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

FLOOD AND DRAINAGE CONSULTANTS (LLFA summary)

The proposals for the Hillingdon Hospital are separated into different phases. The drainage comments below respond to Phase 1, Hospital redevelopment; and Phase 2, Residential Development. I provide the following comments on behalf of the Lead Local Flood Authority:

Phase 1 - Hillingdon Hospital - Surface Water Drainage

I have identified a number of requirements for further information with two items that have been identified as 'fails' in their assessment. These relate to [a] exceedance rates and [b] maintenance of drainage features.

A - Exceedance rates
Whilst it is recognised that information would ideally be submitted showing exceedance flows in the 1/100 year (plus climate change) there is no policy requirement to provide solutions to ensure drainage arrangements manage this run-off. The policy requires the proposals to demonstrate greenfield run-off rates can be achieved in the 1/100 year (plus climate change) event or as close to this target as possible.

information to demonstrate the exceedance levels would not alter the drainage strategy but would inform warning and evacuation measures. This information can be secured through condition.

B - Maintenance Measures
It has also identified that the assessment does not provide sufficient information on 'the tasks and frequencies' for various drainage features.

Again, whilst this information would be useful it is not essential to assessing the efficacy of the proposed drainage solution at this stage of the development process.

Drainage Strategy
The drainage strategy presented has been developed in consultation with the Lead Local Flood Authority and has undergone various iterations and has responded to comments and queries raised. There are still outstanding matters to be resolved and these can be secured through the following condition:

'Prior to commencement of development (excluding demolition) a detailed surface water drainage scheme shall be submitted to and approved in writing by Local Planning Authority. The drainage strategy shall detail:
1. Results of porosity tests across the site (at agreed locations) to determine the permeability of the ground in order to establish the impact the ground conditions have on storage of water in the 1 in 100 year storm event (plus 40% allowance for climate change).
2. Full surface water drainage plans and necessary reports/commetary that show:
a. The use, type and location of sustainable urban drainage systems (in accordance with the London Plan drainage hierarchy) that demonstrate the attenuation of 4,355m3 (unless otherwise agreed in writing with the Local Planning Authority) of surface water run-off in the 1 in 100 year storm event (plus 40% allowance for climate change).
b. The outfalls and connections to surface water sewers and demonstration that the greenfield run-off rate in the 1 in 100 year storm event (plus 40% allowance for climate change) will be achieved.
c. Details of hydrobrakes, overflow routes and exceedance routes
d. Details of how subsurface drainage features are protected from the unintended ingress of water (ground or surface)
3. The scheme shall also provide details of the monitoring and maintenance regime to ensure the drainage scheme will remain at optimum efficiency and effectiveness over the lifetime of the development.

The development must proceed and be operated in accordance with the approved scheme and arrangements.

Reason
To ensure the development does not increase the risk of flooding to people and property.

Phase 2 - Residential Development - Surface Water Drainage
The residential development in Phase 2 is submitted in outline only and the detailed drainage strategy is less advanced than for Phase 1. The attenuation needed to achieve greenfield runoff rates in the 1 in 100 year storm event (plus 40% allowance for climate change).

The following condition is therefore required:
Prior to commencement of development of Phase 2, a surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate the use of sustainable drainage systems in accordance with the London Plan drainage hierarchy that shows the development will (a) provide at least 3,650m3 of attenuation capacity and (b) achieve greenfield runoff rates in 1 in the 100 year storm event (plus 40% allowance for climate change).

The scheme shall be accompanied by details of the monitoring and maintenance regime to ensure the long term efficacy of the surface water drainage scheme.

The development must proceed in accordance with the approved scheme

Reason
To ensure the development does not increase the risk of flooding.

Phase 1 - Hospital Development - Foul Water Drainage
Thames Water has provided a response to the planning application raising concerns over the capacity in the foul drainage network. The response is not sufficiently detailed to fully understand the extent of concerns and they have not responded to attempts to resolve the problems.

Thames Water, as the statutory foul drainage provider, is legally obliged to ensure capacity in the network for new developments and this is secured through required infrastructure charges.

Furthermore, the applicant has confirmed that the level of foul water discharge will be comparable between the current hospital and the redevelopment. This is because the new hospital although larger, will have more modern servicing that provides a more efficient base case. Consequently, there is no detailed evidence presented that indicates the new hospital could not achieve a suitable foul drainage solution. The following condition is therefore necessary:

Prior to commencement of development (excluding demolition) a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of the discharge rates and requirements, the capacity of the receiving network and the details plans and drawings showing connections to the wider network.

The development shall proceed in accordance with the approved plans.

Reason
To ensure the development achieves and effective foul drainage solution.

Phase 2 - Residential Development - Foul Water Drainage
No information is yet available in relation to the Phase 2 development and therefore the following condition is required:

Prior to commencement of development (excluding demolition) a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of the discharge rates and requirements, the capacity of the receiving network and the details plans and drawings showing connections to the wider network.

The development shall proceed in accordance with the approved plans.

Reason
To ensure the development achieves and effective foul drainage solution.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

REDEVELOPMENT OF THE HOSPITAL

Good Growth Objective GG1 of the London Plan sets out the concept of good growth of which diversity, equality and inclusiveness are key pillars. Objective GG1 further emphasises the need for access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities in order to engender active participation and social integration, and tackle social isolation.

Policy S1 of the London Plan (2021) 'Developing London's social infrastructure' states:
A When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local

community.
B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans.
C Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
D Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
E New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.
F Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:
1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or;
2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.
G Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan.

Policy S2 of the London Plan (2021) 'Health and social care facilities' states:
A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:
1) identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes
3) undertake a needs assessment to inform Development Plans, including an audit of existing health and social care facilities. Needs should be assessed locally and sub-regionally, addressing borough and CCG cross-boundary issues
4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries
5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.
B Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.
C New facilities should be easily accessible by public transport, cycling and walking.

The London Borough of Hillingdon Strategic Infrastructure Plan (2017), which underpins the Local Plan, highlights that there is a need to redevelop Hillingdon Hospital to ensure ongoing sustainability of acute hospital services in the borough. The redevelopment of Hillingdon Hospital is also accounted for within the West London Strategic Infrastructure Delivery Plan (2021). The Development Plan is supportive of new and expanded health

facilities, with Paragraph 7.23 of the Local Plan: Part 2 (2020) stating:
'New medical and health service uses are best located in town centres and areas well served by public transport and supported by adequate parking provision.'

As part of the pre-application discussions, it was demonstrated that the applicant, working in partnership with the Hillingdon Health and Care Partnership, has developed a robust and inclusive process which aligns with clinical requirements. Moreover, the proposal has undergone extensive scrutiny via NHS England & Improvement, ensuring that integrated care and the NHS 10-year Plan are reflected; and there has been engagement to address changing demographics.

The proposal involves the phased replacement of the existing hospital with a new hospital. The current hospital floorspace amounts to 57,539 sqm and the proposal would deliver a larger hospital of approximately 79,604 sqm. An area of land for additional expansion at a later date is also included within the scheme should it be required. It is recommended that this 'expansion area' is secured through an appropriately wording obligation within a legal agreement should the application be approved.

The Hillingdon Hospital is largely life expired, with some elements being built in the 1940s as emergency wartime accommodation, which are still in use today. The six facets survey report conducted in 2021 identified that 80% of the hospital building will require major repair or replacement soon.

The new hospital would allow for a more efficient arrangement, which in turn would allow additional services to be provided. The range of services being provided at the hospital will remain the same as those existing. It is recommended that should the application be approved the hospital building should be conditioned to prevent it being utilised for other uses within Class E. As such a condition is proposed to be attached to any grant of planning consent limiting the Use of the new hospital building to Use Class E (e), which is defined in The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 as:
'Class E (e) for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner.'

The NHS North West London Integrated Care Board has commented that they are fully supportive of the planning application. The GLA have confirmed that the principle of redeveloping the site to provide a modern Hospital is strongly supported in strategic planning terms.

There is strong support for new hospitals and healthcare provision within the NPPF, The London Plan (2021) and Local Policy. The new Hospital will replace an existing array of Hospital buildings on the site that are in a poor state of repair and the new proposals will enable the provision of enhanced services through upgraded facilities. A condition is recommended to limit the future use of the building to ensure it provides medical and health services, rather than other uses within Class E. As such there is support for the principle of a new Hospital facility on the site.

HOSPITAL EXPANSION AREA
The current hospital site has been developed in an ad hoc manner and therefore the size of the proposed hospital has been subject to lengthy discussions between the NHS Trust, their partners, the GLA and the Council to ensure that it would provide the required level

and breadth of care services needed, which would enable the release of part of the site to be redeveloped for residential use. The application is supported by a Needs Case Summary which summarises the research that led to the sizing of the proposed new hospital. The hospital needs case was developed in consultation with all strategic partners and has been set out in a series of reports and presentations to Hillingdon Council and the GLA as part of the design development stages of the proposals between November 2020 and submission of the planning application in May 2022.

The current buildings on the site and their present state and layout mean that the Trust is unable to exploit efficiencies available from new models of care, the North West London (NWL) health and social care system is unable to fully exploit the benefits of integrated care, and patients miss out on better outcomes available through more effective care being provided closer to home.

The proposed scheme supports delivery of the overarching plan for the NHS set out in The NHS Long Term plan (2019) and has been developed in the context of local plans set out by the NWL Health and Care Partnership and the Hillingdon Health and Care Partners.

Hillingdon Hospital was selected for redevelopment as part of the Hospital Infrastructure Plan (HIP) - now the 40 Hospitals Programme - in September 2019 as the condition of the hospital is amongst the worst in England. This was also reflected in the Trust's most recent Care Quality Commission (CQC) review, rating Hillingdon Hospital as 'Inadequate' with regards to safety, largely due to the estate.

The Trust therefore developed a Strategic Outline Case (SOC) for the redevelopment of the hospital site to meet modern care standards and the future capacity requirements.

In preparation for the redevelopment of the hospital the Trust developed a Clinical Services Strategy, in partnership with a range of organisations from within the Redevelopment Partnership Board (above). Across eleven speciality areas the development of this Clinical Services Strategy identified the future needs of Trust's catchment population.

The eleven clinically led working groups identified the trends in the needs of patients, how these needs could be best met in future, in order to improve patient care, experience and the efficiency of the hospital. The outputs of these eleven groups were brought together by the Clinical Services Strategy Steering group into a consistent strategy.
Detailed demand and capacity modelling using these proposed models of care and future demographic projections allowed the sizing of a new hospital to fulfil the Clinical Services Strategy. The Redevelopment Programme is a direct consequence of this work, as it fulfils the strategy the Trust published earlier in 2020.

This demand and capacity modelling has been developed with 5, 10 and 20 year time horizons in accordance with best practice.

The needs case for the New Hillingdon Hospital has been developed in full consultation with all strategic health partners. The methodology and assumptions were then shared with Council and GLA and a series of meetings held to discuss this prior to submission of the planning application.

On this basis, the hospital is correctly sized to meet current and projected needs for up to 20 years. From the outset of pre-application discussions, the LPA have remained concerned that forward planning and projections should look beyond the 20years modelled.

Therefore in addition - and as a future proofing measure - a plot within the masterplan site (the surface car park) is allocated to allow expansion space should this ever be required. This could include development of new building(s) above a retained car park or in combination with a reduction in car parking space based on assessed demand.

RESIDENTIAL USE

The National Planning Policy Framework (2021) has a requirement to encourage the effective use of land and encourages the use of previously developed, vacant and underutilised sites to maximise development potential, in particular for new housing. Chapter 5 of the National Planning Policy Framework (NPPF), supports the delivery of homes, confirming that local authorities should, through their Local Plans, demonstrate how housing targets and objectives will be met. Particular emphasis is given to housing delivery over the next five years, but authorities are also required to consider growth beyond this.

Good Growth Objective GG2 of the London Plan promotes the optimisation of land, particularly through the redevelopment of brownfield sites in opportunity areas and town centres and surplus public sector land, as a key part of the strategy for delivering additional homes in London. Policy GG4 (Delivering the homes Londoners need) of the London Plan (2021) states that to create a housing market that works better for all Londoners.

With respect to sites occupied by hospitals, Policy S2 encourages boroughs to co-locate health facilities with other uses, including housing, as a way of using land more efficiently. London Plan Policy H1 in seeking to increase the supply of housing in London, sets borough housing targets, and in Table 4.1 puts the minimum ten-year target of 10,830 homes for the London Borough of Hillingdon.

Policy H1 of the Local Plan: Part 1 - Strategic Policies 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 London Plan (2021) Good Growth Objective GG2 makes it clear that those involved in planning must enable the development of brownfield land, particularly on surplus public sector land (as is proposed in this application). Policy H1 supports the redevelopment for surplus publicly owned sites.

The GLA have confirmed that the principle of redeveloping the site to provide a modern Hospital, and MSCP co-located with new housing through consolidation and the optimisation of land use is strongly supported in strategic planning terms.

The proposal would comprise the redevelopment of surplus publicly owned land to deliver up to 327 new homes of which 54% would be affordable (by habitable room). The application would make a valuable contribution towards meeting the borough's housing targets. The principle of residential use in this location is therefore considered appropriate and in line with local, regional and national policy.

TOWN CENTRE USES

Policy DMTC 1 'Town Centre Developments' of the Local Plan: Part 2 (2020) states:
A) The Council will support 'main town centre uses' where the development proposal is consistent with the scale and function of the centre. Town centre development will need to

demonstrate that:
i) adequate width and depth of floorspace has been provided for the town centre uses; and
ii) appropriate servicing arrangements have been provided.
B) Residential use of ground floor premises in primary and secondary shopping areas and in designated parades will not be supported.
C) Proposals for 'main town centre uses' in out of centre locations will only be permitted where there is no harm to residential amenity.
D) The Council will:
i) expect proposals for 'main town centre uses' to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach; and
ii) consider the effect of the proposal, either individually or cumulatively on the vitality and viability of existing town centres. Development proposals in out of centre and edge of centre locations, which exceed 200 sqm of gross retail floorspace, or 1,000 sqm of combined main town centres uses, will require an impact assessment.

The application proposes 736 sqm of 'town centre uses' defined in the submission as Use Class E. Policy DMTC 1 of the Local Plan: Part 2 (2020) outlines that main town centre uses will typically be required to follow a sequential approach. However, it is noted that the proposed town centre uses are directly linked to the new community that would be created by the larger hospital and the new residential units. The 736 sqm. of floorspace set aside for town centres uses is less than 1% of the total quantum of floorspace proposed, and 2.5% of Phase 2. They also have a role in activating a new area of public realm. It would therefore not be logical to insist on a sequential test, noting that there is an inherent requirement for these uses to be in this location.

However, Policy DMTC 1 also requires an impact assessment for main town centre uses that would exceed 1,000 sqm or 200 sqm of gross retail floorspace. It is noted that 736 sqm total falls below the higher threshold for cumulative town centre uses and a retail impact assessment is therefore not required on this basis. A restriction is required however to ensure all of this floorspace is not occupied by Use Class E(a), as this would trigger the need for an impact assessment. It is recommended therefore that a condition is attached to any grant of planning consent that ensure this Use Class floorspace is capped at a maximum of 200 sqm to ensure that the development is in accordance with the requirements of the Development Plan.

In addition, given that Use Class E encompasses a range of different uses and some of these may have a detrimental impact on residential amenity, highway safety and parking stress, a further condition is recommended that limits these units so that they operate within Use Classes E(a) retail, E(b) for the sale of food and drink where consumption of that food and drink is mostly undertaken on the premises, and E(c iii) services which it is appropriate to provide in a commercial, business or service locality only.

Subject to the attachment of these conditions the proposed Town Centre (Class E) uses are considered to be acceptable.

7.02 Density of the proposed development

Policy D2 'Infrastructure requirements for sustainable densities' of the London Plan (2021) states:
A The density of development proposals should:
1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels
2) be proportionate to the site's connectivity and accessibility by walking, cycling, and

public transport to jobs and services (including both PTAL and access to local services)
B Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.
C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

Policy D3 'Optimising site capacity through the design-led approach' of the London Plan (2021) states:
The design-led approach
A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. 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, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.
B 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 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites.

D Development proposals should:
Form and layout
1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
3) be street-based with clearly defined public and private environments
4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience
5) achieve safe, secure and inclusive environments
6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
7) deliver appropriate outlook, privacy and amenity
8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
9) help prevent or mitigate the impacts of noise and poor air quality
10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character
11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy
14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

E Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that all new residential development should take account of the Residential Density Matrix contained in the supporting Table 5.3. and that all developments will be expected to meet habitable rooms standards.

As this is a Hybrid planning application it is important to acknowledge it is formed of two parts, the Phase 1 detailed element for the new Hospital Building and the Phase 2 outline area for 327 new dwellings.

The Phase 2 area is 3.5 hectares, Policy DMHB 17 seeks for new developments to achieve the appropriate density which is compatible with the local context. Supporting Table 5.3 recommends that for a PTAL of 3 that a density of 80-100 dwellings/ha is appropriate. The illustrative masterplan proposes 327 dwellings which comprise 93 dwellings per hectare and 192 habitable rooms per hectare in line with the requirements of Policy DMHB 17.

For these reasons the proposed density is considered appropriate and compliant with Policy DMHB 17 and Policy D3 of the London Plan.

UNIT MIX

NPPF 62 explains that in the context of determining the minimum number of homes and delivery a sufficient supply of the homes, "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies".

Policy H10 of the London Plan (2021) requires that schemes consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
2) the requirement to deliver mixed and inclusive neighbourhoods
3) the need to deliver a range of unit types at different price points across London
4) the mix of uses in the scheme
5) the range of tenures in the scheme
6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
7) the aim to optimise housing potential on sites
8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 (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, developments should demonstrate how the provision of family housing (>3 bedroom units) has been optimised, to address local needs.

Hillingdon's Strategic Housing Market Assessment ("SHMA") (2018) identifies a need for larger affordable units, particularly two bedroom (45%) and three bedroom (38%) properties. In terms of private marked housing needs, the SHMA similarly identifies a need for larger units, particularly three bedroom (61%), four bedroom (18%) and two bedroom (17%) properties.

The Council seeks a balanced mix of 1, 2, and 3 or more bedrooms with an emphasis on providing family sized units (3 bedroom and larger). The most recent and up to date housing needs assessment indicates that the greatest needs within the borough are for family sized accommodation.

The proposed unit mix within the Illustrative Masterplan submission for the Phase 2 outline area is indicative on the basis of a maximum residential floorspace. Given the significant need for family homes, a condition will be imposed to secure a minimum of 20% of the residential accommodation as 3+ bedroom family units. The applicants submission includes an indicative unit mix which combines a maximum unit mix for the Outline Area based on a maximum residential floorspace.

The Market Unit Mix is illustratively provided as:
1 Bed units 30-40%
2 Bed units 35-45%
3 Bed Flats 10-20%
3 Bed Houses 5-15%

The Affordable Housing Unit Mix is illustratively provided as:
1 Bed units 20-30%
2 Bed units 25-35%
3 Bed Flats 20-30%
3 Bed Houses 15-25%

The Council's Policy Team have reviewed the proposed housing mix and confirmed that it is considered to be acceptable subject to the imposition of a condition to secure a minimum of 20% family homes across the site.

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

CONSERVATION AREAS & LISTED BUILDINGS
Paragraph 196 of the NPPF (2021) says 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.

Policy HC1 'Heritage conservation and growth' of the London Plan (2021) 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 HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape (including locally and statutorily Listed Buildings, Conservation Areas, Areas of Special Local Character and Archaeological Priority Zones and Areas), and encourage the reuse, modification and regeneration of historic assets.

Policy DMHB 4 requires that new development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states 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 substantial harm or total loss of significance without providing substantial public benefit that outweighs the harm or loss;
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 proposals 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.

Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

Setting of Heritage Assets

The application site not within a Conservation Area. The site is situated close to two conservation areas that contain both statutory and locally listed buildings. There are also two statutory listed buildings with The Furze (Grade II) on the eastern part of the development site and the Prince of Wales Public House (Grade II) further to the east on the junction where Colham Green Road meets Pield Heath Road.

The application has been accompanied by a detailed Heritage, Townscape and Visual Impact and Tall Building Assessment. The assessments are comprehensive and help to determine any potential impacts on nearby heritage assets. The Council's Conservation and Design Officer has reviewed the proposals and provided detailed comments.

Hillingdon Village Conservation Area is situated to the north of the development site and contains the original village of Hillingdon. The area contains a number of statutory listed buildings, including the Grade II Bishopshalt Grammar School, Grade II Cottage Hotel,

Grade II* Church of St John. Grade II* Cedar's House and the Red Lion Public House Grade II. The majority of the statutory and locally listed buildings are situated within the northern part of the Conservation Area with only Bishopshalt Grammar School in the southern part. It is considered that the conservation area and the statutory and locally listed buildings are of a sufficient distance away from the proposed development site that there would be no harm to their significance.

Cowley Church Conservation Area is located to the west of the application site. It also contains a number of statutory and locally listed buildings including the Grade II* Church of St. Laurence, Grade II Bell House and the locally listed 1 & 2 Manor Lodge. These assets are located with the northern most portion of the area with the majority of the conservation area to the south comprising undeveloped open space until it reaches the buildings of Manor Farm to the south.

In assessing the easterly views within Heritage, Townscape and Visual Impact Assessment in particular views 1and 2 the current and proposed views of the hospital would be seen. It is considered that given the current views of the existing hospital and the proposed development there would be some visual change, however, given the distance between the heritage assets and the hospital the extent of change would not result in any harm to the significance of the Cowley Church Conservation Area.

The Furze is a grade II listed building located on the eastern side of the Hillingdon Hospital site adjacent to Colham Green Road. This former country house dates from the early C19 and is currently in a poor condition and has been included on the Heritage at Risk Register 2021 as compiled by Historic England. The building has been extended unsympathetically in the past with large 20th century rear extensions. The original house, however, is still clearly discernible. The former house also retains a substantial amount of original internal architectural decorative finishes which add to the building's special interest along with a substantially intact floor plan.

Planning and listed building consent applications to repair the building and undertake alterations for the building to provide an Adult Audiology Haematology, Education Centre and Clinical Admin Offices were recently approved as set out in Section 3.3 of this report. The refurbishment of the Furze is a key part of the decant project of the overall scheme to enable demolition and redevelopment of the new main hospital. Taking into consideration the location of the heritage asset in relation to the proposed buildings and the existing setting, which does not contribute to its significance, no harm would be caused to the significance of The Furze.

The Prince of Wales Public House is also grade II listed. It was built in the late eighteenth century and is now currently used as a restaurant. The building is two storeys in height with architectural features such as a hipped slated roof, painted brick walls, vertical sliding sash windows with glazing bars in exposed moulded frame and three canted bays. The building is situated on a prominent corner site where Colham Green Road Meets Pield Heath Road and is one of a few remaining historic buildings within the area of the pre-urbanized village. For similar reasons as the Furze it is not considered that the development would cause harm to the heritage asset.

It is considered that the development would not cause harm to the surrounding heritage assets and the proposals would accord with the relevant paragraph 196 of the NPPF and local plan policies HC1, DMHB1, DMHB4 in relation to heritage assets.

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 Greater London Archaeological Advisory Service were consulted on the proposals and stated that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The Greater London Archaeological Advisory Service conclude that no further assessment or conditions are therefore necessary.

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.

The proposed development site occupies the statutory height and technical safeguarding zones that ensure air traffic approaches and the line of sight of navigational aids and transmitters/receivers are not impeded. The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre.

The Ministry of Defence (RAF Northolt) and Heathrow Airport have reviewed the application and confirmed that they have no concerns in respect of the maximum height of the buildings, which have a maximum height of 44.25m above ground level.

The Ministry of Defence and Heathrow Airport have however requested a number of conditions be attached to any grant of planning consent. These conditions relate to maximum building heights, the requirement for a Bird Hazard Management Plan and a Crane Management Strategy due to concerns regarding the use of cranes.

National Air Traffic Services (NATS) were consulted on the proposals and have confirmed that they have no objections to the application.

These conditions requested by the Ministry of Defence and Heathrow Airport are recommended to be attached to any grant of consent. As such the proposals are deemed to have an acceptable impact on airport safeguarding in accordance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan part 2 - Development Management Policies (January 2020).

7.05 Impact on the green belt

Paragraph 137 of the NPPF (2021) states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their

openness and their permanence.

Paragraph 148 of the NPPF (2021) states that when considering any planning application, local planning authorities should 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 'London's Green Belt' of the London Plan (2021) states that the Green Belt should be protected from inappropriate development and that development proposals that would harm the Green Belt should be refused except where very special circumstances exist.

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

The site is not located within the Green Belt or on Metropolitan Open Land. There are areas of Green Belt to the east of the site beyond Colham Green Road and to the West beyond Royal Lane. The site is a significant distance of over 175m from the Green Belt to the west and there are numerous buildings in between. The Green Belt to the east is nearer, being 60m away at its closest point. However, again there are buildings and other structures that separate the proposals from the Green Belt.

As such the proposed development is considered to have an acceptable impact on the Green Belt and to acccord with Paragraph 137 and 148 of the NPPF (2021), Policy G2 'London's Green Belt' of the London Plan (2021) and Policy DMEI 6 of the Hillingdon Local Plan: Part 2 (2020).

7.06 Environmental Impact

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 DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that:
A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.
B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.
C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.
D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

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 Council's Contamination Officer has reviewed the submitted details and confirmed that the geo-environmental information concerning current preliminary findings, including the proposed approach for phasing of additional ground investigations is acceptable. The Council's Contamination Officer considers that the proposal is acceptable subject to a planning condition requiring details of a remediation strategy. It is recommended that the planning condition be separated into the separate phases of the development given the nature of the works and the timeframes involved.

The Environment Agency have also reviewed the proposed details and raised no objections subject to the attachment of conditions relating to contamination, groundwater protection, borehole management and piling. These conditions are recommended to be attached to

any grant of planning consent.

Subject to such conditions, the proposal is considered in accordance with Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

CIRCULAR ECONOMY

Policy D3 'Optimising site capacity through the design-led approach' of the London Plan (2021) states:
The design-led approach
A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. 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, and existing and planned supporting infrastructure capacity.

Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan (2021) states:
B Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:
1) how all materials arising from demolition and remediation works will be re-used and/or recycled
2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
3) opportunities for managing as much waste as possible on site
4) adequate and easily accessible storage space and collection systems to support recycling and re-use
5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
6) how performance will be monitored and reported.
C Development Plans that apply circular economy principles and set local lower thresholds for the application of Circular Economy Statements for development proposals are supported.

London Plan (2021) paragraph 9.7.1 states:
Waste is defined as anything that is discarded. A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London should move to a more circular economy as this will save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions. The successful implementation of circular economy principles will help to reduce the volume of waste that London produces and has to manage. A key way of achieving this will be through incorporating circular economy principles into the design of developments as well as through Circular Economy Statements for referable applications.

London Plan Policy D3 expects development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are preferable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

Separate circular economy statements have been submitted for the outlined and detailed elements of the application, and both statements have been reviewed by the GLA who have stated that the applicant has not provided a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility). As the applicant has not provided a written confirmation that the destination landfills have the capacity to receive waste the GLA have requested that these details be captured by condition. A suitably worded condition is therefore recommended to be attached to any grant of planning consent to secure these details.

The GLA have also requested that the Circular Economy Statements be updated to include a pre-development audit justifying why demolition of the existing buildings is required rather than their re-use.

It should be noted that the requirement for such an audit was not published until late March 2022, and the circular economy strategy for the application was developed during the months prior to April 2022, based on the previous GLA guidance. As such a pre-redevelopment audit was not included in the original submission. However, once the new guidance was known, the applicant made every effort to adopt the new GLA guidance within the limited time available prior to the planning submission. As such, the planning submission included a comprehensive report section in the Circular Economy Statement (Section 3 on pages 14 to 17) which details the rationale for the redevelopment approach (rather than a refurbishment approach). Section 3 includes a summary of the estate condition survey summarising 81% of the current structures as in a poor or bad condition and references details from Mott MacDonald's engineering audit. In addition a pre-demolition audit of the buildings has been carried out and appended to the Circular Economy Statement.

It should also be noted that a prior approval consent has been granted in April 2022 for the demolition of the hospital buildings under application ref. 4058/APP/2022/671. As such, the LPA consider that the submission contains sufficient details to justify why demolition is required rather than re-use. It should however be noted that whilst the LPA do not consider anything further is needed, the GLA may require further information or the imposition of suitable conditions, which will be dealt with at Stage 2, when the application is referred back to the Mayor.

Therefore, subject to the condition noted above to capture waste capacity details and the Stage 2 process to resolve the need for a demolition audit, the proposals are considered to be acceptable and in line with Policies D3 and SI 7 of the London Plan (2021).

WHOLE LIFE CARBON

London Plan Policy SI2 requires development proposals that are referable to the Mayor to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint. The applicant has submitted a WLC report that has been reviewed by the GLA and they have confirmed that the results are within the reasonable range and the application is therefore deemed to be in accordance with London Plan (2021) Policy SI2.

7.07 Impact on the character & appearance of the area

Paragraph 130 of the NPPF (2021) states that planning decisions should ensure that developments:
a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

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

Paragraph 132 of the NPPF (2021) states that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

Policy D4 of the London Plan (2021) states:
A - Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.
B - Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny
C - Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.
D - The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:
1) include a residential component that exceeds 350 units per hectare; or
2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.
E - The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management,

ensuring that:
1) design reviews are carried out transparently by independent experts in relevant disciplines
2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
4) design review recommendations are appropriately recorded and communicated to officers and decision makers
5) schemes show how they have considered and addressed the design review recommendations
6) planning decisions demonstrate how design review has been addressed.

Maintaining design quality
F - The design quality of development should be retained through to completion by:
1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

Policy D9 of the London Plan relates to Tall Buildings, and states:
Definition
A - Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
Locations
B -
1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.
2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

Impacts
C Development proposals should address the following impacts:
1) visual impacts
2) functional impact
3) environmental impact
4) cumulative impacts
a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and

designed into the building as integral features from the outset to avoid retro-fitting.

Public access
D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

Policy BE 1 of the Hillingdon Local Plan: Part 1 (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

Policy DMHB 10 of the Hillingdon Local Plan: Part 2 (2020) states that:
Any proposal for a high building or structure will be required to respond to the local context and satisfy the criteria listed below. It should:
i) be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings;
ii) be located in an area of high public transport accessibility and be fully accessible for all users;
iii) be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views;
iv) achieve high architectural quality and include design innovation. Consideration should be given to its silhouette, so that it provides a positive contribution to the skyline, its design at street level, facing materials and finishes, lighting and night time impact;
v) where residential uses are proposed, include high quality and useable private and communal amenity space and ensure an innovative approach to the provision of open space;
vi) not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces;
vii) be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities;
viii) comply with aviation and navigation requirements and not adversely impact upon telecommunication, television and radio transmission networks; and
ix) demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes.

Supporting paragraph 5.32 states that for the purposes of this policy, high buildings and structures are those that are substantially taller than their surroundings, causing a significant change to the skyline.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (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.
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 development seeks to make optimal use of the land through comprehensive redevelopment to deliver a hospital that improves both the experience of patients and staff. This will also allow the rest of the site to be redeveloped for a residential led scheme that also supports commercial, business and services within the area.

The scheme has undergone extensive pre-application discussions with LBH Officers and the GLA where detailed design advice has been provided at relevant stages of the design development process. The application is supported by a Design and Access Statement (DAS), which comprehensively sets out the design for the detailed element of the application. Given that part of the application is in outline form, while Design Guidelines and parameter plans have been submitted, accordance with Policy D4 of the London Plan, Phase 2 will be required to lodge a Design Code for approval, which will be reviewed by internal and external consultees to ensure a high standard of design quality.

The Hillingdon Hospital application site is 9.5 hectares in area and is located within an urban area of Hillingdon that is situated south of Pield Heath Road that is bound to the west by Royal Lane and to the east by Colham Green Road.

The existing Hillingdon Hospital site has an eclectic mix of buildings dating from the 1940s. The main hospital building was built in the 1960s and is situated towards the centre of the site and dominates the local area at 10-storeys. A mix of other hospital buildings are scattered across the area interspersed with surface level car parking and pockets of landscaping.

The site has been developed on an adhoc and piecemeal basis since the 1940s rather than being planned based and on the needs of the hospital at different times. The condition of most of the buildings (81%) are now classed as either poor or bad and that the continual upkeep of the buildings is a huge ongoing cost that is impacting on the quality of care that can be given to patients.

The vast majority of buildings on site are functional hospital buildings of little or no architectural or historic interest. No objection is therefore raised to their demolition in principle subject to a high-quality replacement scheme. The buildings in their current condition generally detract from the visual amenity of the local area.

The site's immediate context is predominantly 2-3 storey suburban houses and flats with the exception of the 4-storey late 20th century flats to the north side of Pield Heath Road that provides access into a residential cul-de-sac. The Hillingdon Estates Department is located north of this cul-de-sac and its incinerator can be seen in longer distance views

due to the structures being taller than the surrounding buildings.

To the west of the site along Royal Lane and beyond can be found traditional two-storey detached, semi-detached and terraced housing with tiled pitched roofs and traditional facing materials of brick and render. Similar properties are also found directly to the south covering an extensive area.

Within these housing estates can be found large areas of green recreational space including Pield Heath to the west and Colham Green Recreational Ground to the east along with areas of Green Belt land.

The hybrid planning application proposes to redevelop the site with the demolition of existing buildings and the erection of a new hospital, multi-storey car park, mobility hub, commercial floorspace and 327 residential units. As outlined above this is a hybrid planning application which has a detailed planning application for the new hospital and an outline application for the residential led development to the central and western parts of the site.

The detailed planning application will see the demolition of existing buildings (excluding the Tudor Centre and the Old Creche) for the erection of a 7-storey (plus ground and basement) hospital that will provide 79,604 sq.m. of floorspace. It is also proposed to erect a 4-storey (plus ground) Multi-storey Car Park that would contain 23,304 sq.m. of floorspace, with a mobility hub at ground floor. Other associated works will include vehicle access, highways works, associated plant, generators, substation, new internal roads, landscaping and public open space, utilities, servicing area, surface car park/ expansion space.

The outline planning application will see the demolition of the remaining buildings on site excluding the Grade II Listed Furze for the erection of 3 blocks up to 6, 7 and 8 storeys to provide a maximum of 327 new residential units.

It is necessary to construct a single-phase new build hospital on the existing hospital site. To enable this to happen the area available to build is defined by the need for the existing hospital to always remain operational during the construction period. The only area large enough to accommodate the new hospital is on the western part of the site adjacent to Royal Lane. This has required a detailed and complex phasing strategy to be developed. Although this approach results in a big constraint on site it is the only realistic option to provide a new hospital whilst also maintaining the same level of essential patient care throughout the construction phase.

The hospital and car park have a simplified rectilinear footprint that runs north south and is set back behind generous landscaping along the Royal Lane frontage. A pedestrian link has been provided between the hospital building and the multi storey car park improving permeability though the development and link through to the reserved matters part of the site to the east.

The main entrance is in the northeast corner as close as possible to Pield Heath Road and public transport. The entrance to the emergency department is located to the south in a two-storey height volume protruded towards the central green spaces.

The proposed multi-storey car park that serves the hospital is located in the north-western part of the site separated by a wide pedestrian link above which sits a fully glazed link bridge connecting the MSCP to the ambulatory floor of the new hospital.

In addition to creating new routes for walking and cycling that would improve permeability through the site the proposed layout would also positively contribute to the street scape by providing activate frontages along Royal Lane and Pield Heath Road.

The application is supported by a Design and Access Statement (DAS), which comprehensively sets out the design for the detailed element of the application.

The outline planning application (all matters reserved, except for access) for the central and western parts of the hospital site are covered within the Design Guidelines (DG) document and a parameter plan which provide a basis for assessing future Reserved Matters applications in terms of layout, form and scale, residential quality, massing and articulation, access, inclusive design and appearance.

The master plan and the Design Guidelines Document for the reserved matters part of the site are broadly supported by the Council's Design Officer, though noting that aspects may change once detailed proposals are progressed at a later date.

The layout is mainly influenced by the phasing approach and the constrained nature of the site and the need to keep the existing hospital operational whist the new hospital is built. The layout and position of the Hospital and multi storey car park is, therefore, supported by the Council's Design Officer.

Height, Scale and Massing
The hospital building at 8 storeys along with the multi-storey car park and mobility hub would be substantial buildings that would be seen prominently within immediate, mid-range and panoramic views. The buildings would be seen in contrast to the much smaller suburban housing that surround the hospital site which are predominantly 2-4 storeys in height.

The Townscape Visual Impact Assessment has looked at a number of views the locations of which were agreed with the local authority. The impact of the development on the townscape can be appreciated within Views 6, 9, 10 and 11 Royal Lane, View 21 Bryony Close, View 2 from Philpots Farm Green Space and View 8 Apple Tree Avenue where the strong contrast with the suburban housing can be seen.

The height of the building is determined by the requirements of the hospital and how it functions. The form is intrinsically linked to the layout. A stack of "T" shaped joined wards to the west and a linear north-to-south volume to the east form the basic mass of the new hospital.

The massing has been concentrated as far into the site as the constraints of a single phase rebuild will allow. The floor-to-floor heights take into account the requirements for the installation of extensive and specialist services. Ceiling heights are therefore around 3 metres. This allows for future changes should the hospital require modernisation at a later date.

The building profile and silhouette is staggered and setbacks are used to provide both articulation and layering of the facade along with material changes. This has helped to promote a more human scale with particular attention to Royal Lane to ensure that the building would contribute positively to the skyline as well as the streetscape.

The submitted Parameter Plan (Maximum Building Heights) illustrates the maximum

building heights proposed across Phase 2. The proposals for the Outline Area comprise three blocks (P01, P02 and P03) which vary in height between 3-8 storeys. The tallest 8 storey element is positioned in the centre of the site, where massing would be at the furthest point away from the existing residential properties.

These blocks would also positively contribute to the skyline forming a cohesive development across the whole of the site. The distribution of the height of the tall buildings across the site (west to east) appropriately steps down in scale to respond to adjacent buildings and The Furze (listed building). The Council's Design Officer has confirmed that this approach is considered appropriate and is supported.

Design

Main Hospital Building
It is proposed that the hospital building will be constructed from a palette of high-quality materials that will reflect the landmark status of the new building. The materials selection and detailing has been carefully chosen for their durability, sustainability, low embodied carbon and low maintenance.

The simple palette of materials will comprise four principal materials that include brick, architectural concrete, glazing and metal. The design detailing and choice of material responds to the townscape. The approach to the architecture and various shades and textures help to break up the perception of bulk and ensure that the public facing edges are legible and of a human-scale.

The west wing of the building, facing Royal Lane will have a unified brick facing with a regular expressed facade grid providing visual interest, depth and articulation. The projecting three western 'wings' would be constructed in lighter contrasting brick that would complement the red brick of the principal block. The elevations would be further broken up with full height windows with wood effect panels and bronze metallic reveals.

The east wing of the new hospital has a two-storey brick facing podium on top of which rests a four-storey element covered with a light beige architectural concrete. The panels will add interest to the facade along with the chamfered window reveals that would be interspersed with the metal bronze-coloured grilles.

The setback top storey would make a positive contribution to the skyline and provide the building with a clearly defined 'top'.

The principal public entrances and areas are clearly defined and are celebrated on the elevations with the inclusion of large glazed areas with curtain walling helping to create active frontages.

Multi Storey Car Park
The facades of the multi storey car park are primarily of brick and are articulated through the alternation of opaque and perforated vertical slots that help to break up the elevation and add visual interest. The opaque slots are made of red brick matching those used in the new hospital facades whereas the perforated slots present multicoloured terracotta extrusions and architectural metal mesh.

The north, east and west facades will primarily comprise openings with perforated metal cladding which allow the car park to be naturally ventilated.

The materials and detailed design of the facades have been discussed at length during the pre-application process. Architectural concrete was queried at an early stage given the potential for staining and concerns over its poor appearance over time. The applicant's architect has considered recent developments that have used the material, looking at the detailed design of the facades, their performance over time and in particular weathering details to ensure water will not run down the face of the building. These studies can be seen within the Design and Access Statement.

The Council's Conservation and Design Officer has confirmed that they are satisfied that with the new architectural concrete products on the market and detailed consideration of the weathering, the material could be supported.

The Council's Conservation and Design Office has raised no objection to the design of the buildings or the choice of materials which will provide an attractive appearance of a human scale that responds well to the area.

The detailed design of the building, the choice of materials and the quality of workmanship will be important factors in the success of the scheme and they are therefore recommended to be controlled by relevant conditions should the application be minded for approval.

In summary the proposed layout, height and mass of the hospital and multi storey car park are supported given the constraints on site and the need to keep the existing hospital operational whist the new hospital is built.

The design of the scheme is generally considered to be of a high standard and responds well to its context. The approach to the architecture and various shades and textures of the materials will help to break up the perception of bulk and ensure that the public facing edges are legible and of a human-scale.

The proposed development would provide an improvement on the existing adhoc hospital development providing a cohesive and better quality of design and layout that introduces public accessible green space.

The development would not have a harmful impact on the setting or the locality. As such the proposals are deemed to be acceptable in design terms.

TALL BUILDING

Policy D9 of the London Plan (2021) state that based on local context, Development Plans should define what is considered a tall building for specific localities and paragraph 5.32 of the of the Hillingdon Local Plan: Part 2 (2020), the supporting text to Policy DMHB 10 states that for the purposes of that policy, high buildings and structures are those that are substantially taller than their surroundings, causing a significant change to the skyline.

Council Officers have reviewed the proposals and undertaken a Tall Building Assessment to determine if the proposal meets the definition of tall buildings in line with Policy D9 of the London Plan (2021) and Policy DMHB 10 of the Local Plan: Part 2 (2020). The Hospital buildings proposed would be taller than 6 storeys or 18 metres and the predominant surrounding building height comprises 2 storeys, with the exception of a few 3 and 4 storey high residential buildings to the north of the site. Taking into account the considerable storey height difference between proposed and existing buildings, the scheme is considered significantly taller than its surroundings. Long and mid range views have also

been reviewed and the proposals are considered likely to cause 'a significant change to the skyline'. As such it is concluded that the proposed Hospital building does constitute a Tall Building as defined by the relevant policies.

The scale of the proposed building has been led by the need to deliver a new hospital while maintaining the majority of the existing hospital buildings. This is required so as to provide uninterrupted medical and health services. As such the new hospital building footprint is constrained by the area of the site available for the structure and the adjacent MSCP. The floor area, and thus the mass of the building, is predetermined to a degree by the areas required in order to provide the services and facilities of the Hospital. Although this approach results in a big constraint on site it is the only realistic option to provide a new hospital whilst also maintaining the same level of essential patient care throughout the construction phase. As such, a constrained site area has resulted in the need for the new hospital to be constructed as a single taller building. As set out previously, the design of the building across several floors also has operational advantages for staff and patients through stacking of the hospital services and facilities.

There have been lengthy design discussions regarding the proposals to minimise the visual impact and break up the massing of the new hospital and MSCP as much as possible. This includes the introduction of changes in the height of the Hospital building to create variety and architectural features and material changes to break up the facades. The choice of materials has been challenged throughout the process to maximise their quality. In considering the impact of the buildings it is also worth noting that there is an existing 11 storey building on the site that will be demolished as part of the development. The existing 11 storey building is of a greater height than anything proposed and offers little architectural quality.

Given the development comprises of tall buildings but it is not located within a preferred tall building location, the principle of a tall building conflicts with the location part of the policies. However, both policy DMHB 10 and policy D9 of the London Plan (2021) set out series of criteria against which to assess the impact of the proposed tall buildings. Design and visual impact are considered within this section of the report and a number of the criteria outlined are considered elsewhere within the report:
- Impact on the local highway network is considered in Section 07.10 of the report
- Impact on neighbour amenity is considered in Section 07.08 of the report
- The consideration of airport safeguarding is addressed in Section 07.04 of the report
- Section 07.11 of the report addresses security and;
- Section 07.22 of the report addresses fire safety.

In terms of wind and microclimate the application is accompanied by a specific report which considers both a quantitative and qualitative wind analysis using Computational Fluid Dynamics analysis. The key findings were that there would be no negative impact on off-site conditions.

Based on the evidence presented and assessed through this report, the proposed tall hospital building is considered to be appropriate in terms impacts, as required by policies D9 and DMHB10. These leave a partial conflict with the location element of the tall buildings policies which are considered to be of moderate significance, and which will need to be weighed against other considerations in the overall planning balance.

Given that the proposed tall building is a new hospital, for which there is very strong policy support at local, regional and national level, on balance the partial conflict with the location

element of the condition is deemed acceptable.

7.08 Impact on neighbours

Policy DMHB 10 (High Buildings and Structures) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) states that proposals for high buildings should (amongst other things) not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces and should be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities. This is supported by Policy D9 of the London Plan (2021).

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

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

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

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

OVERLOOKING AND PRIVACY

The proposed hospital building and multi storey car park hav been designed in such a way as to ensure that, within the constraints of developing a new hospital whilst retaining an existing functioning hospital on the site, as great a separation distance between existing residential properties and the new buildings can be provided as possible. The nearest residential properties to the proposed new hospital building and multi storey car park are located on the western side of Royal Lane. These properties would be between 31m, at the closest point, and 73m from the proposed built form. There are additional residential properties on Bryony Close and Apple Tree Avenue to the South and beyond Colham Green Road to the north. Again all these properties are comfortably in excess of 21m from any proposed built form.

Given the separation distances noted above it is considered that no loss of adjacent residential privacy would occur as a result of the proposals, in compliance with the relevant sections of Policy DMHB 11 and Appendix A of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

OUTLOOK

When designing the new hospital building a significant constraint imposed was the need to retaining an existing functioning hospital on the site and to provide sufficient parking, due to the loss of surface level parking. An additional requirement was the need to achieve efficiencies in the design of the hospital so that treatment areas were appropriately located in terms of their adjacency and therefore patients could be moved quickly and easily as required. The result of these two critical requirements, in addition to a significant number of other considerations, is that a single large footprint building of significant height is proposed. As set out above, the built form has been separated as far as possible from existing residential properties following lengthy pre-applications discussions. In addition, the architectural design of the building and the use of materials has been explored so as to try to break up the building in terms of its visual massing. However, it is recognised that despite these efforts the proposed scheme is likely to still appear as a large dominant structure within the immediate locality and may therefore have a detrimental impact on the amenity of adjacent residential occupiers as a result.

This detrimental impact has been mitigated as far as possible by the separation distances noted above (the closest residential property on Bryony Close being 48m away), the design of the building and use of soft landscaping, in particular along Royal Land and with mature landscaping to the south between the Bryony Close and the proposed service yard and the southern elevation of the building. It can also be noted that the existing hospital site, whilst incorporating low rise structures to the western side of the site, offers little in terms of outlook and architectural quality as the site contains surface parking and buildings in a poor state of repair.

Given there is deemed to be a degree of detrimental impact on adjacent residents, it is is recognised that the scheme represents a minor conflict with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). However, overall whilst the detrimental impact on properties along the western and southern boundaries of the site is regrettable and has been mitigated as far as possible within the constraints of the development, the detrimental impact is considered to be acceptable when the broader benefits of the development in terms of healthcare provision are taken into account.

SUNLIGHT, DAYLIGHT AND OVERSHADOWING

The application is supported by a Daylight and Sunlight Assessment Report that has been reviewed by an independent third party. The Report notes that the assessments have been carried out in accordance with the 2011 BRE Guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'. It should be
noted that these have now been withdrawn and superseded by the 2022 BRE Guidelines which were published on the 8th June 2022.

The updates to the 2022 BRE Guidelines primarily relate to the assessment of internal daylight and sunlight within proposed developments and state that they are intended to be used in conjunction with the interior daylight recommendations in the British Standard Daylight in buildings, BS EN 17037.

The Report is dated March 2022 and as such was drafted prior to the updated guidance being published. As this report deals with the impacts on neighbours and internal overshadowing rather than internal daylight and sunlight amenity there is no need to update the assessments.

The Vertical Sky Component (VSC) and No Sky Line (NSL - also referred to as daylight distribution) assessments have been considered for neighbouring daylight and the Annual Probable Sunlight Hours (APSH) test has been used for neighbouring sunlight.

The neighbouring VSC, NSL and APSH methodologies used remain the recommended assessments as per the 2022 BRE Guidelines and are considered to be in line with good practice.

The report sets out the impact of the proposed development on those properties that could be impacted upon in turn, the majority of which are on Royal Lane. The Council's independent third party specialist has confirmed that they are generally in agreement with the approach, scope and methodology used and they are in agreement with the conclusion that the neighbouring properties will be left with good levels of daylight for a typical sub-urban landscape.

With regard to sunlight, the Council's independent third party specialist recommended that the results for properties 7-12 Bryony Close should also be appended to the report for review. However the applicant has confirmed through their design team that as regards 7-12 Bryony Close, none of the site facing windows are orientated to within 90 degrees of due south therefore in accordance with the BRE Guidelines they are not material for sunlight assessment.

As a result, the Council's independent third party specialist has agreed that there is no requirement to assess these properties and they are in agreement with the applicant's assessment and conclusion that the development presents a very high degree of sunlight compliance.

As such the impact of the proposals on neighbouring residential properties with regard to Phase 1 is considered to be acceptable and any impact from Phase 2 will be considered at the appropriate reserved matters stage.

COMMERCIAL USES

There are no concerns raised regarding the impact of the proposed commercial units within Phase 2, the outline element of the proposals, on adjacent occupiers subject to conditions regarding types and hours of use, noise and extraction flues. These conditions are recommended to be attached to any grant of planning consent and the reserved matters, when submitted, will be reviewed to ensure they propose an acceptable form of development.

As such it is considered that the proposed commercial uses would not result in an un-neighbourly form of development and complies with the requirements of Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (2020).

7.09 Living conditions for future occupiers

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) states 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:
i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

Table 3.1 of London Plan (2021) Policy D6 requires the following:

- One storey 1-bed 1 person unit should provide a minimum of 39 square metres Gross Internal Area (GIA) with a bathroom (or 37 square metres with shower room);
- One storey 1-bed 2 person unit should provide a minimum of 50 square metres GIA;
- One storey 2-bed 3 person unit should provide a minimum of 61 square metres GIA;
- One storey 2-bed 4 person unit should provide a minimum of 70 square metres GIA;
- One storey 3-bed 4 person unit should provide a minimum of 74 square metres GIA; and
- One storey 3-bed 5 person unit should provide a minimum of 86 square metres GIA.

The above is also supported by Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020)

The applicant has confirmed that all of the units proposed within Phase 2 will meet the minimum internal space standards. These details will be secured at Reserved Matters Stage.

PRIVATE AMENITY SPACE

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020) states:

A) 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 standards set out in Table 5.2.
B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.
C) 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. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.
D) 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.

Table 5.2 states that studio and 1-bedroom flats should provide a minimum of 20 square metres of amenity space, 2-bedroom flats should provide a minimum of 25 square metres of amenity space and 3+ bedroom flats should provided a minimum of 30 square metres of amenity space.

The Phase 2 development proposed is therefore indicatively required to deliver the following external amenity space:
1 Beds x 94 x 20m2 = 1880m2
2 Beds x 118 x 25m2 = 2950m2
3 Beds x 115 x 30m2 = 3450m2

Total = 8280m2

The applicant has confirmed that all of the units proposed within Phase 2 will be provided with private amenity space. The indicatives areas currently proposed are 1,310m2 of Private Balconies/Terraces and Gardens, 7000m2 of Communal (Private) Amenity Space and 2,438m2 of Children's Play Space. The housing mix and external amenity provision details will be secured at Reserved Matters Stage, however as indicated they are considered to be in accordance with relevant policies at outline stage.

PLAY SPACE PROVISION

Policy S4 of the London Plan (2021) states that residential development proposals should incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child that:
a) provides a stimulating environment
b) can be accessed safely from the street by children and young people independently
c) forms an integral part of the surrounding neighbourhood
d) incorporates trees and/or other forms of greenery
e) is overlooked to enable passive surveillance
f) is not segregated by tenure
This is supported by the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10m2 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.

Policy DMHB 19 of the Hillingdon Local Plan: Part 2 (2020) states:
A) 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.
B) 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.
C) The Council will resist the loss of existing play spaces unless:
i) a replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Where this is not possible, development will only be permitted in exceptional circumstances where there are over-riding planning merits to the proposal; and
ii) it can be demonstrated robustly that they are no longer required and that their loss would not lead to a shortfall in overall play provision in the local area.

Policy DMCI 5 of the Hillingdon Local Plan: Part 2 (2020) states:
A) For all major development9 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.
B) 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.
C) The Council will resist the loss of existing play spaces unless: i) a replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Where this is not possible, development will only be permitted in exceptional circumstances where there are over-riding planning merits to the proposal; and ii) it can be demonstrated robustly that they are no longer required and that their loss would not lead to a shortfall in overall play provision in the local area.

In accordance with Policy S4 of the London Plan (2021), development proposals that include housing should provide play space for children based on the short and long-term needs of the expected child population generated by the scheme. Based on the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', play space requirements is divided into 3 categories;
-age 0-4; door step play/within 100m;
-age 5-11 years; play within 400m of site;
-age 12+ years; play within 800m of site.

The applicant has confirmed that 2,438m2 of Children's Play Space will be provided however the structure, form and final size of each of these areas of play space will be determined through the detailed design development of the Outline Area as part of future RMAs.

Using the GLA's population child yield calculator, it has been identified that the masterplan will need to provide enough play space for 244 children which equates to 2,390sqm of children's play space. The outline masterplan provides adequate space to accommodate a total of 2,438 sqm of formal children's play space, thus meeting the requirements of the policy. The GLA have confirmed that the proposed level of play space is acceptable in their Stage 1 response.

The quantum, quality and design of the play space shall be secured at Reserved Matters Stage. As such the proposed level is deemed to accord with Policy S4 of the London Plan (2021), the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation' and Policies DMHB 19 and Policy DMCI 5 of the Hillingdon Local Plan: Part 2 (2020).

PUBLIC OPEN SPACE

NPPF paragraph 98 highlights how access to a network of high quality open spaces and opportunities for sport and physical activity positively contributes to the health and well-being of communities, and can deliver wider benefits for nature as well as towards addressing climate change. NPPF 130 b) identifies the role of effective landscaping in ensuring that developments are visually attractive.

Policy G4 of the London Plan (2021) states that development proposals should create areas of publicly accessible open space, particularly in areas of deficiency, where possible

Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) states 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.

Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020) states:
A) Proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified

deficiencies in the quantity, quality and accessibility of open space. Regard will be had to Hillingdon's local recommended standards of provision for all relevant typologies of open space.
B) The provision of major new pieces of open space should contribute positively to Hillingdon's existing networks of green spaces. In major town centre developments, new civic space may be required as an alternative to green open space.
C) Proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality or location, will be resisted.

The proposed development will provide a network of landscaped spaces for use by patients, visitors, future residents and the wider local community. The proposals state that they seek to implement a high quality landscaping scheme including a large central open space in the centre of the site, and improved woodland area to the south of the site. These large central public open spaces are intended to become focal points.

Hospital
For the Hospital element of the development Phase 1C is proposed to deliver the majority of the open space, including a large area of central public open space that has been designed to incorporate pedestrian routes to allow easy access for visitors through the site and facilitates an east-west connection. This area comprises 2,062sqm of open space. In addition, a woodland area to the south of the hospital would comprise 6,042sqm of public open space that could also be utilised by patients, visitors and local residents. Further smaller areas of open space are also proposed, such as the linear park along Royal Lane. A total of 8,104 sqm of mixed use open space will be provided across the two main areas (central open space and woodland area).

Residential
Within Phase 2 of the proposals there are 5 areas of public open space proposed:
OS1 (225sqm) would be located below Block P01 and is intended to be designed as a multifunctional space that accommodates the main civic square of the development. This area would be primarily hard landscape but should contain greenery in the form of hedges and trees, plus potential water features.
OS2 (1423sqm) would be between Block P02 and P03 and is also intended to be designed as a multifunctional space that accommodates an open area for the community, including a children play space and spill out of town centre uses. This space would include permeable paving
and grassland.
OS3 (1,410 sqm) to the north of the Furze is the main pedestrian access route for the development from the East, connecting to the Furze, the hospital and the residential plots. The design should ensure that a permeable pedestrian flow through OS3 is enabled prioritising the east-west connection. The main entrance to the Furze is intended to be celebrated and clearly identified with easy access.
OS4 (980 sqm) to the east of Block P02 would include and enable views to the Furze from Pield Heath Road and from the main pedestrian routes. This area would include tree planting and therefore the location of trees and appropriate canopy heights are an important consideration to enable the views to be protected.
OS5 (550sqm) between Block P03 and the Furze would include a variety of trees and plants, as well as informal children play space and seating areas. The existing trees and vegetation in OS5 would be preserved and integrated into the landscape design.

In excess of 8104sqm of public open space is proposed within Phase 1 and 4588sqm is

proposed within Phase 2. This is considered to be an acceptable level given it will be supported by other incidental pockets of open space across the site and given the close proximity of Colham Green Recreation Ground. The Stockley Country Park is also located less than 20 minutes' walk away. It is recommended that a condition be attached to any grant of planning consent to ensure that the proposed public open space in Phase 2 is secured.

Subject to this condition, the proposals are deemed to accord with Policy G4 of the London Plan (2021), Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020).

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 T1 of the London Plan 2021, states that developments within London should support the Mayor's modal shift targets set out in the London Transport Strategy, with the Mayor setting an overall target of 80% of journeys to be made by walking, cycling and public transport. To support this, outer London is expected to have a sustainable mode share of 75%.

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 T6.5 of the London Plan (2021) notes 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.

Policy D8 of the London Plan (2021) requires development proposals to ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Paragraph D in particular, expects development proposals demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.

Policy D8, paragraph E of the London Plan (2021) seeks to ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible.

Policy DMT 1 of the Local Plan: Part Two (2020) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:
i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;

ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
iii) provide equal access for all people, including inclusive access for disabled people;
iv) adequately address delivery, servicing and drop-off requirements; and
v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments11 that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that Development proposals must ensure that:
i) safe and efficient vehicular access to the highway network is provided to the Council's standards;
ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;
iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;
iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and
v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.

Policy DMT 5 of the Local Plan: Part Two (2020) states:
A) Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:
i) the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;
ii) the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
iii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and
iv) the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.

Policy DMT 6 of the Local Plan: Part Two (2020) states that development proposals must comply with the relevant parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when:
i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or
ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.
B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

The site is served by 6 bus routes operating along Pield Heath Road, with the nearest stops near the main entrance in Pield Heath Road. There are no rail stations within walkable distance of the site, however the bus routes servicing the site provides connections to West Drayton, Uxbridge and Hayes & Harlington and Hillingdon stations. The PTAL is 3 along Pield Heath Road and Colham but this reduces to 2 towards the interior of the site. The predominant PTAL is taken as 3 by TfL, on a scale from 0 to 6b, with 6b being the highest.

Within Phase 1 the proposed new hospital is to be located next to a multi storey car park (MSCP) that includes a 'mobility hub' on the ground floor. The MSCP would provide 781 car parking spaces with access from Royal Land and the main new route through the hospital site.

The 'mobility hub' would offer a range of connected transport modes supplemented with enhanced facilities and information features to both attract and benefit hospital visitors and patients including:
- enhanced public transport access
- live timetables and departure boards
- off-bus ticketing
- cycle hire, cycle parking and repair workshop
- car club spaces
- priority car share spaces

Phase 1C would also provide a surface car park which could accommodate 161 car parking spaces, and up to 14,000sqm of expansion space if required by the hospital.

Within Phase 2 a total of 302 car parking spaces are proposed. The provision of car parking within the Outline Component will be provided on the basis of a ratio of 0.89 spaces per residential unit. In accordance with the overarching car parking management plan for the site, the exact number and location of these parking spaces would be determined through the detailed design development of the future Reserved Matters Application(s).

TRANSPORT ASSESSMENT

The hospital will continue to generate trips associated with visitors and staff, plus ancillary trips associated with deliveries and servicing of the hospital. The provision of 942 car parking spaces (781 in MSCP and 161 in a surface car park) represents a reduction to the current 977 car parking spaces associated with the hospital, in line with relevant policies.

The submitted Hillingdon Hospital Transport Assessment describes how multi-modal travel demand has been recorded at the current hospital and how future travel demand for the new hospital is forecast. It is stated that as a new hospital will be provided in place of the existing hospital through the redevelopment, data on hospital-based travel demand has been thoroughly investigated as part of the development of a baseline Clinical Travel Demand Model (CTDM). Two overarching "scenarios" have been examined within the Transport Assessment, with Scenario 1 representing no significant changes to accessibility and Scenario 2 representing the implementation of targeted sustainable transport strategy and mobility enhancements which aim to increase the sustainable mode share.

The Council's Transport Consultant has fully interrogated the details provided during the lengthy pre-application discussions and those submitted as part of the application. A

number of questions have been raised in regard to the submitted Hillingdon Hospital Transport Assessment and associated documents. The applicants' transport consultant has provided a response to these questions, and the Council's Transport Consultant is satisfied that the responses provide a robust analysis, and that they are in accordance with relevant policies.

The hospital site trip generation as reviewed in the Transport Assessment is considered to be reflective of a major trip generating hospital use, and provides a consideration of baseline and proposed forecast scenarios, taking into account future measures for improved cycle accessibility, improved cycle parking, pedestrian connectivity and wayfinding, along with rationalisation of parking. A full detailed Travel Plan and including monitoring and measures to reduce parking demand is recommended to be secured by a s106 legal agreement. If secured a sustained steady shift towards more sustainable travel is predicted, continuing to push towards the goal of 80% of trips within London being made by sustainable modes (on foot, by cycle, or using public transport) by 2041.

The impact of the proposals on the local and wider network has been considered. National Highways have requested additional information and modelling be provided to determine the impact of the scheme on the Strategic Road Network (SRN), specifically the potential impact upon Junction 4 of the M4, Junction 1 of the M40 and the A40/B467 junction.

In response, further details have been submitted by the applicant's design team regarding the proposals and the potential impact on the SRN. As stated above two scenarios have been investigated in the submitted Transport Assessment and the results indicate that in all peak periods bar the Scenario 1 AM peak there would be an overall reduction in traffic generated by the entire proposed development. Therefore, given the overall distribution is not forecast to change, if overall trips decrease as a result of the proposed development then the number of trips distributed to the SRN would also be expected to decrease.

The above information has been provided to National Highways, who have confirmed that given the limited scale of the proposed increase in vehicle trips compared to the extant land uses on site, they are satisfied that the proposals would not materially affect the safety, reliability and/or operation of the strategic road network (SRN). As such National Highways raises no objections to the proposals.

With regard to the impact of the proposals on the immediate local network, micro-simulation traffic modelling is being undertaken by the TfL based on input details provided by the applicant. Some further assessment of the local network for future stages of development as part of TfL's VMAP process is still required to detail and review concerns regarding residual traffic impact or operation at specific junctions. The applicant's transport consultant has confirmed that they will continue to liaise with TfL to satisfy any concerns of junction impact.

Noting the timeframes and current status of modelling, TfL have sought to identify highway mitigation ahead of the modelling being completed, and requested that Split Cycle Offset Optimisation Technique (SCOOT) be utilised for the coordination and control of traffic signals and bus priority measures for the junction with Pield Heath Road and the new access road through the site be included within the scope of the s278 works for this junction.

The Transport Assessment and transport evidence base that has been presented is deemed to be acceptable in terms of traffic impact as a result of the proposals.

It is recommended that a Parking Design and Management Plan (PDMP) be secured by condition. This should include detail on how parking spaces at the site will be managed, including how parking charges for hospital parking will be reviewed, and car parking spaces reduced and repurposed to support achieving a strategic modal shift. It is also proposed that a full Hospital and Residential Travel Plans (plus bonds) be secured by s106 legal agreement.

PHASE 1 CONSTRUCTION CAR PARKING

During construction works the western area of the site will be cleared to enable Phase 1a and Phase 1b construction to begin, which is broadly the footprint of the existing surface car park. This would leave 322 spaces on-site that can be maintained through construction.

To offset the spaces lost during construction, the Trust has developed a strategy to enable the decant of some operations from Hillingdon Hospital to Mount Vernon Hospital. A planning application for the use of existing car parking at Mount Vernon was approved on the 20th of May 2022 (application ref: 3807/APP/2021/3328).

The planning application at Mount Vernon Hospital grants permission for the use of the Car Park A Overflow car park and the Chapel Car Park, along with the Trust's use of car parking spaces at Mount Vernon that were previously utilised by third party tenants. In total this will see an additional 127 parking spaces being able to be utilised by the Trust.

Further work is being undertaken to enable the decant of hospital car parking for staff which will remain in proximity of Hillingdon Hospital. The decant car parking solution is still being reviewed however. Given that the temporary car parking solution is required for the development to proceed, but has not yet been resolved, it is recommended that should the application be approved a bespoke Heads of Term be included within the s106 Legal Agreement. This should ensure that the required parking is provided prior to the relevant phase of construction. It is recommended that the obligation seeks a number of measures such as exploring opportunities to reduce the parking demand through sustainable travel options, opportunities for additional parking on-site, adjacent existing parking availability and only once those options are exhausted is a new temporary car park solution considered.

MOBILITY HUB/SUSTAINABLE TRAVEL

The application includes a number of measures aimed at increasing the use of sustainable forms of travel rather than the private car. As set out above the proposed 'mobility hub' would offer a range of connected transport modes supplemented with enhanced facilities and information features, including live timetables and departure boards, off-bus ticketing, cycle hire and repair workshop, car club spaces and priority car share spaces. In addition, as part of Phase 1b, a corridor widening scheme will be delivered around the existing bus stops on Pield Heath Road to enable two-way traffic flow between stopped buses. It is also proposed to include a bus diversion into the site as part of Phase 1c works that will be operational during Phase 2. The provision of this bus route through the site would bring patients and visitors closer to the hospital entrance and will increase the PTAL rating.

TfL's Bus Infrastructure team will need to carry out a final technical review of the design and the bus tracking to confirm that they meet bus standards. It is recommended that these details be secured through conditions and the s106 agreement, this will include any necessary lease agreements between the Trust and TfL.

It is also commented that the bus stop infrastructure, which must be of a high-quality, be secured through the s106. This would include s278 agreement for works on the public highway and a contribution of up to £250,000 for infrastructure within the application site on private land.

It is also recommended that should the application be approved, a condition be attached that requires full details of the operation of the mobility hub, via a Mobility Hub Management Plan (MHMP), to ensure that the details proposed to assist sustainable travel are secured. The MHMP would be required to include details on opening hours, public transport information systems & ticketing, car club arrangements, electrical vehicle charging provisions and potential enhancements, cycle parking arrangements, security & repair, e-bike charging, priority car share spaces and other measures to support sustainable and active travel.

HEALTHY STREETS

An Active Travel Zone (ATZ) assessment has been undertaken, with several recommendations made to improve the active travel environment. As part of the planning application the applicant has identified 3no. cycle routes to the hospital that could benefit from investment that would improve the safety and convenience of cycling along these roads. These routes would be:
1. From Falling Lane north along Royal Lane to the hospital
2. From the junction of Cleveland Road with Station Road west along Church Road and Pield Heath Road to the hospital
3. From Park View Road north along Colham Green Road to the hospital entrance leading off Colham Green Road.

Noting the shift nature of the hospital workers, it has been requested that in addition to the normal assessment the applicant also undertake a night-time assessment of the routes. This request was accepted and the updated assessment has been undertaken and reviewed, though one route - the cycling route to West Drayton - was not assessed as part of the night-time ATZ due to the unsafe nature of part of it. Further details have therefore been requested with further information to be provided at Stage 2, should the application be determined for approval, regarding what alternative route is there for those who are cycling to use during darker hours.

It is recommended that to support achieving a strategic modal shift, a contribution towards delivering the improvements identified within the current and night-time ATZ assessment should be secured. A contribution is therefore sought to be secured by the s106 legal agreement as set out within this report.

The applicant has undertaken a Healthy Streets Check for four different segments along the site boundary. These scores have been queried by TfL and they have been updated by the applicant's Highways Consultant. TfL have raised concerns with regards to the walking and cycling connection to Apple Tree Avenue that has been provided. Whilst they welcome the connection, they state that insufficient detail has been provided on the character or dimensions of this link, and insufficient consideration has been given to the pedestrian environment linking to this within the site. They are also of the view that the route to the main hospital entrance appears to be indirect.

These details can be secured through the discharge of the proposed landscaping condition. However in terms of the link to the hospital entrance from the Apple Tree Avenue

route, the applicant has confirmed it is intended to be a 3m wide pedestrian cycle path linking through the woodland within the site and connecting to the wider network of routes through the site. The link is routed through the woodland to avoid both the service yard at the south west corner of the site and the ambulance yard and storage facilities on the south east face of the new hospital building. Wherever the route crosses internal service roads formal pedestrian crossing points giving priority to non-motorised users have been provided.

TfL have also requested that further detail be provided for the connection west to Royal Lane, with particular regard to cycle access. The applicant has confirmed that the intended network will provide linked routes of minimum 2.0m wide footways / footpaths for pedestrians along with some minimum 3.0m shared-use pedestrian/cycleways. These details can be secured through the discharge of the Landscaping condition.

WAYFINDING

TfL have requested that contribution be secured towards wayfinding for the site. They have requested that the wayfinding signs are appropriately located to encourage sustainable and active travel between the site and key trip attractors. The applicant has agreed to a Wayfinding contribution of £47,500 and this will be secured through the s106 legal agreement.

ELECTRIC VEHICLE CHARGING POINTS & ACCESSIBLE PARKING

Electric Vehicle Charging for the Hospital is proposed in line with Policy requirements. 22% of hospital staff car parking and 12% of patient parking will have EV charging provision and 10% of all EV charging spaces provided will be passive provision. In addition, 100% of the patient EV charging spaces will have 22kW fast charging capacity.

The majority of the EV charging spaces will be located within the MSCP. The Ambulance Yard and Service Yard will have fast 22kW fast charging capacity in all spaces. Therefore, all EV charging spaces will be in place upon completion of Phase 1c. The application also proposes that all electric vehicle charging docks will be wall mounted and bays will be at a reduced height, to allow accessibility for disabled users.

It is proposed that the four car club spaces that are to be provided in the mobility hub would have active electric vehicle charging provision, in line with Policy T6 of the London Plan (2021). This will be secured in the either the proposed Mobility Hub Management Plan condition discharge.

At least 20 per cent of the car parking provided for the residential element are proposed to have active EVCP provision, with passive provision for all remaining spaces. These details are in line with policy requirements and will be secured at Reserved Matters Stage.

Of the 942 parking spaces proposed for the hospital, 56 will be disabled person parking spaces. This is equivalent to 6 per cent which is in line with Policy T6.1 of the London Plan (2021). In addition 4% of parking spaces will be enlarged bays as per Policy T6.1 of the London Plan (2021). Details of the disabled parking for the residential Phase 2 will be secured at Reserved Matters Stage and will be in accordance with relevant policies.

PEDESTRIAN ENVIRONMENT

A list of pedestrian improvements proposed as part of Phase 1b is:
- New signalised crossing on Pield Heath Road west of Royal Lane
- New zebra crossing on Royal Lane south of Pield Heath Road
- Addition of tactile paving on eastern arm of Pield Heath Road/Royal Lane mini roundabou
- Widened footway on northern side of Pield Heath Road
- Area of public realm south of Pield Heath Road
- Upgraded single phase crossings at Main Entrance junction (all arms)
- Priority crossings at all crossings along the boulevard within the hospital areas of the site
- Southern/eastern footway on Pield Heath Road and Colham Green Road (south-east of mini roundabout) extended along Colham Green Road southern arm to new controlled crossing
- New controlled crossing on southern arm of Colham Green Road/Pield Heath Road mini roundabout
- Tactile paving at all crossing points in the site
- New continuous 2.0m footway to relocated Children's Nursery

A list of pedestrian improvements proposed in Phase 2 is:
- New 6m pedestrian and cycle corridor along eastern and northern site frontage
- New pedestrianised east/west corridor through site (service traffic only)
- New 3.0m shared-use footway/cycleway along northern side of internal route from Colham Green Road

TfL have reviewed the application and whilst welcoming a number of the proposed improvements, they have raised issues with some of the elements proposed. For example, the new crossings to the west and south of the Pield Heath Road / Royal Lane mini-roundabout are welcome, however TfL are concerned that this leaves the junction without controlled pedestrian crossing facilities on the eastern and northern arms. The addition of tactile paving to the informal crossing on the eastern arm also adds a safety risk as this is not deemed a safe crossing-point and indicates to visually impaired pedestrians that it is puts them at unacceptable risk.

These comments were passed to the applicant who has confirmed through their Highways Consultant that the new crossings have been positioned to reflect the main pedestrian desire lines and to encourage use of routes that avoid existing conflict areas such as the private driveway access on the north west corner of the mini-roundabout and limited inter-visibility areas associated with walls, fences and vegetation on the north of Pield Heath Road. They also point out that the provision on the eastern and northern arms remains as per the existing arrangements and the proposals have been subject to an independent Stage 1 Road Safety Audit, which did not raise any concerns at this location.

The provision of an eastern footway and a controlled crossing at the northern end of Colham Green Road is also welcomed by TfL. However, they are of the view that this leaves the eastern and western arms of the Pield Heath Road / Colham Green Road junction without safe crossing facilities.

The applicants Highways Consultant has responded to confirm that the new crossing has been provided to reflect the main pedestrian desire lines and to replicate and improve on existing provision, which currently provides no crossing points on the eastern and western arms and no footway to the east of Colham Green Road, thus forcing pedestrians to cross within the junction itself. The provision is therefore deemed to be a significant improvement on the existing arrangements. The proposals have again been subject to an independent Stage 1 Road Safety Audit, which did not raise any concerns regarding the crossing

provision at this location.

Notwithstanding this it should be noted that the arrangements shown within the submission will be subject to further discussion with the relevant highway authorities during detailed final design. The provision of safe crossing facilities on the eastern and western arm of the Pield Heath Road/Colham Green Road junction have been requested to be introduced at the detailed design stage and if appropriate secured through the appropriate mechanism.

In addition TfL have raised concerns with the design of various junctions around the site boundary as they are considered to represent a poor and potentially unsafe environment for pedestrians, with wide junction mouths and pedestrians diverted away from their desire lines. The proposed Phase 1b Colham Green Road access is one such example, as is the Phase 2 Pield Heath Road residential access junction.

The applicants Highways Consultant have responded to confirm that the widths and radii used are required to allow safe vehicle movements, including TfL buses, that do not encroach into opposing carriageways for the majority of vehicle types and allow for non-conflicting two-way movements. It is recommended that this issue be discussed further at GLA Stage 2 should the application be determined for approval.

CYCLE PARKING

Hospital
London Plan 2021 Policy T5 provides the minimum cycle parking standards, for a hospital, these are 1no. long stay space per 5no. full time employees (FTE) and 1no. short stay space per 30no. FTEs. On the basis that the hospital would have 1,676no. FTE staff on-site in any given 24-hour period, the applicant would be required to provide as a minimum 336no. long stay cycle parking spaces and 56no. short stay spaces.

The development proposed would be in accordance with these standards. 56 short-stay cycle parking would be provided in the form of 28 Sheffield Stands. It is proposed that 20 of the Sheffield Stands will be located at the western end of the Main Entrance Plaza. The remaining eight Sheffield Stands will be located east of the MSCP. The Brunel University/Santander cycle scheme is also proposed to be retained. The cycle docking station would be located east of the MSCP in proximity of the Main Entrance junction with Pield Heath Road.

Hospital cycle parking would accord with the standards identified in Policy T5 of the London Plan (2021). These spaces are considered secure as access to these spaces would be controlled by way of a key code or swipe card.

Within the long-stay cycle parking area there would be a small cycle workshop area with tools and equipment for cycle maintenance, lockers and shower facilities would also be provided. The provision of these facilities is supported, however there should be scope for alternative types of cycle parking provided within the long-stay cycle parking. The applicant has identified that all the long-stay cycle parking will take the form of two-tier racks. As identified within London Cycle Design Standards (LCDS), at least 5% of cycle parking spaces should be suitable to accommodate larger and adapted cycles. The LCDS clarifies that two-tier stands are not suitable for everyone and should be used in conjunction with more accessible (i.e. Sheffield) stands.

The applicant has also proposed that they will be providing e-bike charging pillars which will

cover 10% of all bike parking. The provision is welcomed subject to the charging being for bikes only and not advertised as for e-scooters, which are not currently legal for use on the highway.

The full details of security, access, lighting, repair facilities and type of cycle stands (including at least 5% of cycle parking spaces being suitable to accommodate larger and adapted cycles) are proposed to be secured through the proposed Mobility Hub Management Plan (MHMP) condition. It is also recommended that the MHMP contains a review mechanism which ensures that additional cycle charging pillars are provided should demand arise.

Phase 2
Cycle parking is proposed in accordance with London Plan (March 2021) standards. The number of cycle parking spaces will be subject to the final unit mix on a phase by phase / block by block basis in accordance with the indicative unit range mix (%).

Internal Cycling routes
The application proposes three main cycle routes within the new hospital campus. These include a 6m wide shared pedestrian/cycle footway along Pield Heath Road, an "internal hospital link" connecting Pield Heath Road with Colham Green Road via the main entrance plaza and a central "Green Corridor".

The shared pedestrian/cycle footway along Pield Heath Road would be 6m wide and link the Pield Heath Road junction with Royal Lane to the Pield Heath Road junction with Coldham Green Road.

The "internal hospital link" would run in a north south alignment through the hospital campus linking Pield Heath Road with Colham Green Road via the main entrance plaza, a bus service would use this route. A 3m wide shared pedestrian/cycle footway would be provided on one side throughout. This is supported by the Council's Highways Officer.

The central "Green Corridor" would pass through the centre of the site linking Colham Green Road with the main entrance plaza. Along this central "Green Corridor" would be a triangular area of public open space. This would be a route for both pedestrians and cyclists but given that the central "Green Corridor" and the triangular area of public open spaces are being provided as a place for people to relax and enjoy fresh air, measures are proposed to calm the speed of cyclists. Allowing cyclist to use this central "Green Corridor" but with measures to prevent high speed cycling is also supported by the Council's Highways Officer.

A bicycle allows the rider to end their journey very close to their intended destination. To guard against inappropriate cycle parking the Council's Highway Officer has requested that short stay parking, such as Sheffield stands, are provided along the central "Green Corridor" adjacent to the triangular area of public open space. It is recommended that these details be secured by condition.

Cycle Hire
The current Brunel University Santander cycle hire scheme would be retained with the docking station to be located east of the MSCP near the main entrance plaza junction with Pield Heath Road. The Brunel cycle hire scheme is operating successfully and the network of docking stations is steadily growing. To allow Brunel cycle hire scheme network to expand in the vicinity of the hospital, the applicant has agreed to a phased contribution of

£18,000 that will be secured through the s106 legal agreement.

CONSTRUCTION LOGISTICS PLAN

To support the application the applicant has submitted a Demolition and Construction Management Plan (DCMP). In line with Policy T7 of the London Plan (2021) a Construction Logistics Plan (CLP) is recommended to be secured through condition. The CLP should be phased to take into account the phased nature of the development. Detail would also be required on how the construction of each phase will not impact on the continued operation of the hospital.

SERVICING AND DELIVERY

The majority of the future servicing and delivery trips would be linked to the proposed hospital. Part of the route to the delivery and servicing yard for this hospital is also used by ambulances. In order to ensure that the movement of all users can be safely and comfortably accommodated, a full Delivery, Servicing & Waste Management Plan is proposed to be secured by planning condition.

Delivery and servicing for the residential element will be from the internal access road, passing through 'The Plaza' to exit the site. Whilst it is noted that 'The Plaza' will only be accessible for deliveries, servicing and emergency vehicles, in order to ensure that appropriate design and management measures are put in place to avoid conflict between different modes of transport a full Delivery, Servicing & Waste Management Plan is also recommended to be secured for Phase 2.

7.11 Urban design, access and security

URBAN DESIGN
The design of the proposed building is considered in Section 07.07 of the report.

ACCESS
This is considered in Section 07.12 of the report.

SECURITY
Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:
i) providing entrances in visible, safe and accessible locations;
ii) maximising natural surveillance;
iii) ensuring adequate defensible space is provided;
iv) providing clear delineations between public and private spaces; and
v) providing appropriate lighting and CCTV.

This is supported by Policy D11 of the London Plan (2021).

The Metropolitan Police were consulted during the course of this application and the Secure By Design Officer visited the site and met with the applicants to discuss the proposals. In discussions with the case officer the Secure By Design Officer stated that they consider the proposed new hospital to be acceptable and that no amendments are required. The MET Secure By Design Officer's formal response requests that a Secure By

Design condition be applied to Phase 2, but that no such condition is considered to be required for the Hospital or MSCP elements (Phase 1).

Therefore, subject to the attachment of the above condition to any grant of planning consent, the proposed scheme is deemed to be in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

7.12 Disabled access

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'.

It is recognised that the existing hospital site has been developed in an ad hoc piecemeal manner that does not achieve current accessibility requirements. The new hospital would therefore result in a significant improvement in terms of accessibility.

The Council's Access Officer has reviewed the proposals and requested that while the hospital has good bus stop links and is accessible by route U1, U3, U4, U5, U7, a convenient 30 minute drop-off point (free of charge) should be shown on plan for people arriving by door-to-door transport services which can be used when visiting a patient). The provision should be made available for the hospital and residential elements and located within 40 metres of the main entrance.

This request has been presented to the applicant and they have agreed to a condition being added to any grant of planning consent to secure the details of an appropriate drop off space in consultation with the Council's Access Officer.

The Council's Access Officer has requested that all pedestrian routes, including the proposed boulevard, should ensure a streetscape design that is compatible with BS 8300:2018. Paving slabs must be selected and installed in accordance with Section 8.4 of this British standard. The applicant has confirmed that this will be the case and that

generally visual contrast / tactile paving will use recognised products and complex or disorientating patterns are avoided. Tactile paving will be used where appropriate near entrances and dropped kerb edges to provide appropriate warning to visually impaired, but equally enable unrestricted level access for wheel chairs. Where any deterrent paving has to be used (for security/ to prevent access to specific places), this is done sparingly and where adjacent to access routes will be visually obvious and considered to avoid risk harm to people.

In terms of the new hospital building, the Council Access Officer has stated that the building, its facilities and services should cater for wheelchair users, including those with multiple complex disabilities, for whom disability is an everyday norm. The hospital should provide ceiling track hoisting equipment within examination rooms, treatment rooms, and other areas where a patient would be expected to transfer from their wheelchair.

The applicant has confirmed that fixed ceiling mounted hoist equipment is located in specific areas of the hospital - within the dedicated changing places room at the main entrance and within each of the ward areas within the larger bariatric bedrooms. For outpatient areas mobile hoists are preferred as this enables more flexible use of the out patient treatment rooms. Mobile hoist provision and storage for these devices is provided within all departments across the hospital and ceiling mounted hoists kept to a practical minimum to accord with both staff training regimes (useability) and maintenance for fixed items.

One final request for the hospital is that a Changing Places cubicle should be provided somewhere centrally, with a preference to provide more than one facility across the site. The submission includes a dedicated changing places space located near to the main entrance. The Hospital Trust have offered to review the provision of a second changing places space, but this would have to be balanced in available area of clinical space. The applicant has advised that all departments do have accessible bathrooms/ toilet facilities and can easily get supported access to mobile hoist facilities within each of these to support the dedicated changing places space.

In terms of the outline Phase 2 Residential element Policy D7 of the London Plan requires at least 10% of new build dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The application confirms that these requirements will be met, however a condition is recommended to be imposed to secure this requirement.

At the Reserved Matters stage, plans that show where the wheelchair accessible homes would be located shall be submitted. The units should be distributed across tenure types and sizes to give disabled and older people equal choices.

With respect to the hospital building, barrier free entrances and horizontal and vertical movement have been embedded in the design and the requests of the Council Access Officer have been accepted where possible as set out above. The Council's Access Officer has reviewed the responses provided and subject to securing details of the drop off raises no objection to the application.

7.13 Provision of affordable & special needs housing

AFFORDABLE HOUSING PROVISION

Policy H4 of the London Plan (2021) states:
A The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:
1) requiring major developments which trigger affordable housing requirements50 to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)
2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided
3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners51
4) public sector land52 delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.
B Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

Policy H5 of the London Plan (2021) and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach', whereby schemes meeting or exceeding a specific percentage of affordable housing by habitable room, without public subsidy, and other criteria such as tenure mix are eligible for the Fast Track Route (FTR). Such applications are not required to submit viability information to the GLA and are also exempted from a late-stage review mechanism. On public sector owned land at least 50% affordable housing is required to be eligible.

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.

Policy H4 of the London Plan seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H5 sets out a 'threshold approach', whereby schemes are eligible for the Fast Track Route (FTR). Such applications are not required to submit viability information to the GLA and are also exempted from a late-stage review mechanism. On public sector owned land such as the application site, at least 50% affordable housing is required to be eligible.

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. The scheme is proposing 54% affordable housing by habitable room, comprised of 70% social/affordable rent and 30% intermediate. Subject to the applicant demonstrating engagement with a registered provider and the consideration of public grant and meeting other policy requirements and obligations, the application would qualify for the FTR. An early-stage review is required to be secured in the S106 agreement.

Subject to the applicant entering into a legal agreement to secure the affordable housing proposed, the application is considered to be acceptable in terms of affordable housing provision and is deemed in accordance with Policies H4, H5 and H8 of the London Plan (2021), Policy H2 and Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020), The Mayor's Affordable Housing and Viability SPG and the NPPF (2021).

7.14 Trees, landscaping and Ecology

LANDSCAPING

Policy G1 of the London Plan (2021) states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

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

i) All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and

ii) Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

Policy 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 application includes detailed landscaping plans for Phase 1, including details of the landscaping proposed within the roof terraces of the proposed hospital building. The Council's Landscape Officer has reviewed the submitted details and provided comments on the proposals. The proposed landscaping is deemed to be an improvement on the existing situation and officers have worked with the NHS to maximise the space available for soft landscaping away from the operational elements of the scheme.

The existing hospital has no areas of space for convalescence, resting or relaxation. The new hospital addresses the lack of landscaping through the significant areas of open space proposed. In order to protect those areas from encroachment by, for example, servicing areas, it is recommended that an obligation is included within the s106 Legal Agreement to secure the level of public open space proposed within Phase 1 in perpetuity.

The woodland area to the south of the site will be a key resting/convalescence area. However, it is considered that this area could be improved through the provision of more seating (only 4 benches are shown) and denser planting to provide a more hospitable environment.

There is also a limited level of soft landscaping in the area between the MSCP and Royal Lane. Soft landscaping was previously proposed to soften the visual impact of the MSCP and it is recommended that this needs to be reintroduced.

It is also recommended that the route between Pield Heath Road (and the bus stops located on it) and the main hospital entrance is of a high-quality and attractive at all times of the day. This will be a particularly important route during the earlier phases of the development and design measures to improve the pedestrian experience and support creating an attractive, comfortable and all-inclusive environment are required.

Therefore, while the proposed landscaping is deemed an improvement on the current situation, given the recommendations above it is proposed that landscape conditions be attached to both Phases of the scheme, should the application be approved, to ensure that the required improvements can be secured.

ECOLOGY/BIODIVERSITY NET GAIN
Policy G6 'Biodiversity and access to nature' of the London Plan (2021) states:
A Sites of Importance for Nature Conservation (SINCs) should be protected.
B Boroughs, in developing Development Plans, should:
1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
1) avoid damaging the significant ecological features of the site
2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3) deliver off-site compensation of better biodiversity value.
D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
E Proposals which reduce deficiencies in access to nature should be considered positively.

London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The application was supported by a Biodiversity Net Gain (BNG) report which stated a 74% increase in habitat units; however, it also mentioned a 9% loss in hedgerow units and 9% loss in river units. The BNG report outlined recommendations for the proposed development to achieve a 10% net gain in hedgerow and river units. The applicant was advised that the 10% net gain should be incorporated into the design or robust justification as to why this is not feasible. The applicant has responded to this request with proposed improvements to the landscaping to show how an 11% net gain could be achieved. As the submitted Biodiversity Net Gain Report has not been updated to achieve the net gain required, it is proposed that a condition be added to any grant of planning consent to ensure an acceptable Biodiversity Net Gain report is provided and the relevant Biodiversity Net Gain secured.

Subject to this condition it is considered that the application would accord with Policy G6 of the London Plan (2021).

URBAN GREENING
The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan. This includes the incorporation of green roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan. The applicant has calculated the Urban Greening Factor (UGF) of the proposed development as 0.32, which exceeds the target set by Policy G5 of the London Plan for developments that are predominantly non-residential. This is considered to be a positive aspect of the proposals that will be secured through the attachment of appropriate landscaping conditions.

7.15 Sustainable waste management

Policy EM11 of the Local Plan: Part 1 (2012) requires all new development 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, ensuring that all waste is managed towards the upper end of the waste hierarchy.

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 2030163
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 use164
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.

Refuse vehicles would enter via the eastern access and leave using the western access. Bin stores would be distributed across the site though the applicant proposes that arrangements would be put in place for these bins to be moved to a central area on collection days so that appropriate drag distances are met.

The Council's Waste Strategy Officer reviewed the submitted details and requested further information regarding the swept path analysis for waste collection from the Hospital service yard and details of the future residential element. The applicant has provided a plan showing the swept path analysis as requested (drawing no. THHR_01-MMD-XX-XX-DR-U-1103 Rev C01) which has been shared with the Waste Management Officer and confirmed as acceptable. The drawing shows turning movements for a 12m rigid vehicle accessing the waste collection location, this vehicle being chosen to represent, and be more onerous than, the likely largest 30 yard roll on roll off skip lorry likely to be used. In terms of the residential element of the development, this falls under Phase 2 of the application, which is in outline form only. Therefore, the Local Planning Authority would receive these details at Reserved Matters stage, when the Waste Strategy Team will be reconsulted. A Delivery, Servicing and Waste Management Plan condition to cover all phases of the development is also recommended to be attached to any grant of planning consent.

The Council's Waste Strategy Officer has confirmed that the proposed details are acceptable for waste and recycling requirements. As such the proposal is considered to be in accordance with London Plan Policy SI7 and Policy DMHB 11 of the Hillingdon Local

Plan: Part 2 Development Management Policies (January 2020).

7.16 Renewable energy / Sustainability

Policy SI 2 'Minimising greenhouse gas emissions' of the London Plan (2021) states:
A Major development should be net zero-carbon.151 This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
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.
B 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.
C A minimum on-site reduction of at least 35 per cent beyond Building Regulations152 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, in agreement with the borough, either:
1) through a cash in lieu contribution to the borough's carbon offset fund, or
2) off-site provided that an alternative proposal is identified and delivery is certain.
D Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.

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 Council's Sustainability Officer and the GLA have reviewed the submitted details and provided comments on the application.

The Energy Statement (THHR_01-ACM-ZZ-XX-RP-Y-000019, Aecom, April 22) submitted in support of the application identifies the two phases of the development: the Hospital Redevelopment and MSCP (Phase 1) and the outline residential element with supporting commercial uses (Phases 2).

Each Phase should aim to achieve the zero carbon requirement in accordance with London Plan Policy SI2; this includes a minimum 35% saving onsite with a minimum requirement through energy efficiency measures.

Phase 1) Hospital Redevelopment
The Hospital Redevelopment does not meet the policy requirements in relation to both the minimum energy efficiency requirements and the minimum total onsite carbon savings. The energy statement identifies a total saving of 31% and is therefore not in accordance

with policy requirements. This position is confirmed by the Council's Sustainability Officer and the GLA.

The 31% onsite CO2 savings results in a shortfall from the zero carbon target (2,324tCO2) of 1,597.7tCO2/annum equating to a cumulative shortfall of 47,930tCO2 over 30years (the time span for calculating the operational carbon footprint of a development).

In accordance with Policy Si2, any shortfall from the zero carbon target should be delivered through either a) a cash in lieu contribution to the Council's Carbon Offset Fund or b) off site provided an alternative proposal is identified and delivery is certain.

The contribution to be secured through a s106 legal agreement for Phase 1 has been calculated by the Council's Sustainability Officer to be: 1,597.7 x 30 x £95 = £4,553,445

The extent of this contribution is significant. A sizeable contribution was assumed to be required through the pre-application process and it was proposed that an alternative offsite option would be pursued within the NHS estate. Mount Vernon Hospital in the north of the borough was identified as a possible receptor site for improvements (i.e. the receptor site for carbon offsetting) which would result in the NHS funds being retained within their property portfolio to save the NHS operational expenditure.

The application submission does not include details of how off site carbon saving within the NHS estate could be achieved. In lieu of this, it is recommended that an energy schedule that contains an opportunity to realise an off site solution together with a time limited clause to secure an alternative cash in lieu contribution to the Council be secured through a s106 legal agreement, should the application be approved. A condition requiring the development to proceed in accordance with an approved energy strategy is also recommended to be secured.

Phase 2
The details for Phase 2 set out in the Energy Strategy identifies a total 60% onsite savings with the appropriate energy efficiency savings for residential and non-residential. This part of the development is policy compliant. However, as this Phase of the proposals is in outline only, the broad approach set out in the energy strategy may change with different technologies, delivery ambitions, orientation and design of the development.

It is therefore recommended that a suitably worded condition and s106 legal agreement obligation is be attached to any grant of planning consent to ensure a detailed energy assessment is submitted. The assessment shall accord with the requirements of the London Plan (2021) Policy SI2 and clearly identify the baseline energy demand and associated carbon emissions in accordance with the prevailing building regulation requirements.

Where the measures do not collectively contribute to a zero carbon saving (noting a minimum requirement of 35% saving onsite) to the agreement of the Local Planning Authority, the report shall set out (a) the 'onsite saving' and (b) the 'shortfall'; both to be presented in tCO2/annum. The 'shortfall' shall then be subject to an offsite contribution in accordance with the London Plan Policy SI2.

Subject to the details of the Energy Strategy, any shortfall identified shall form a cash in lieu contribution to the Council's carbon offset fund at £95/tCO2 annualised over 30 years (i.e. shortfall x 30 x 95 = £contribution).

Therefore, subject to the proposed s106 legal agreement obligations and conditions for the two phases being secured, the proposed development is deemed to be in accordance with Policy SI 2 'Minimising greenhouse gas emissions' 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.

Policy SI 13 of the London Plan (2021) states:
A) Lead Local Flood Authorities should identify - through their Local Flood Risk Management Strategies and Surface Water Management Plans - areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.
B) Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:
1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
2) rainwater infiltration to ground at or close to source
3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
4) rainwater discharge direct to a watercourse (unless not appropriate)
5) controlled rainwater discharge to a surface water sewer or drain
6) controlled rainwater discharge to a combined sewer.
C) Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.
D) Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF). The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.

Policies DMEI 9 of the Hillingdon Local Plan: Part 2 (2020) states that:
A) Development proposals in Flood Zones 2 and 3a will be required to demonstrate that there are no suitable sites available in areas of lower flood risk. Where no appropriate sites are available, development should be located on the areas of lowest flood risk within the site. Flood defences should provide protection for the lifetime of the development. Finished floor levels should reflect the Environment Agency's latest guidance on climate change.
B) Development proposals in these areas will be required to submit an appropriate level Flood Risk Assessment (FRA) to demonstrate that the development is resilient to all

sources of flooding.
C) Development in Flood Zone 3b will be refused in principle unless identified as an appropriate development in Flood Risk Planning Policy Guidance. Development for appropriate uses in Flood Zone 3b will only be approved if accompanied by an appropriate FRA that demonstrates the development will be resistant and resilient to flooding and suitable warning and evacuation methods are in place.
D) Developments may be required to make contributions (through legal agreements) to previously identified flood improvement works that will benefit the development site.
E) Proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

DMEI 10 of the Hillingdon Local Plan: Part 2 (2020).
A) Applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan.
B) All major new build developments, as well as minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.
C) Rain Gardens and non householder development should be designed to reduce surface water run-off rates to Greenfield run-off rates.
D) Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.
E) Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.
F) Developments should be drained by a SuDs system and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the SuDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon. Major development should adopt a 'treatment train' approach where water flows through different SuDS to ensure resilience in the system.
G) All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.
H) All new residential development should demonstrate water usage rates of no more than 105 litres/person/day.
I) It is expected that major development proposals will provide an integrated approach to surface water run-off attenuation, water collection, recycling and reuse. Water and Wastewater Infrastructure
J) All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development. Where there is a capacity constraint the local planning authority will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.

Supporting paragraph 6.46 states that sustainable drainage systems (SuDS) are vital in addressing Hillingdon's surface water flood risk, which is predicted to rise as climate change increases the frequency of heavy rainfall and as further new development and

intensification within the Borough increases the volume of waste and surface water going into the existing drainage infrastructure. SuDS manage runoff from developments, reducing the quantity of water entering drains, especially at peak periods, improving the quantity of runoff and promoting amenity and biodiversity benefits from using water in the environmen

The site is located within Flood Zone 1. The site is relatively flat, with higher ground to the north. The topography gradually falls by approximately 4m at the southwestern corner of the site. The closest main watercourse is the River Pinn which is situated approximately 0.45 km west of the site. There is an unnamed watercourse which runs through the site, which is urban in nature and flows in a south westerly direction along the southern boundary of the site. This watercourse is culverted in sections, specifically downstream of Colham Green Park and immediately downstream of the site boundary before discharging into the River Pinn southwest of the site.

A review of the Utility Survey shows that there are several water mains located within the site boundary and along the roads that surround the development, including Pield Heath Road, Colham Green Road and Royal Lane. Records from Thames Water indicate a 600mm surface water sewer located in Royal Lane to the west of the proposed site.

The proposals for the Hillingdon Hospital are separated into different phases. Phase 1 for the new hospital and public space on the western/southern portion of site is proposed to include the following SuDS features:
- Swales and wetlands (western side of the hospital building and MSCP).
- Two attenuation tanks (within service yard and ambulance access road of the hospital).
- Green roofs (on the two proposed buildings).
- Rainwater harvesting (for external areas for irrigation and vehicle washing, or general area clean down in the FM yard area).
- Raingardens (across the hospital site).
- Permeable paving (along the ambulance access south of the site which will discharge to the watercourse onsite).

The applicant has considered infiltration, discharge to watercourse and discharge into sewers. It is proposed that the development will discharge the southeastern portion of the site into the existing watercourse running across the southern end of the site. The existing watercourse can only provide shallow discharge points, which limits its use for the wider site. Therefore, it is proposed that the remainder of the site will discharge into a public surface water sewer which runs along Royal Lane. Consent is required from Thames Water for the proposed discharge into the surface water sewer.

The Phase 2 residential phase in the central/eastern section of site is proposed to include the following SuDS features:
- Two attenuation tanks.
- Other potential SuDS (suggested ponds, swales, green/blue roofs).
- Potential for rainwater harvesting.

The applicant proposes that these SuDS features will discharge into the existing watercourse on site via a cut off drain along the northeast boundary.

The Lead Local Flood Authority have raised no objection to the proposals subject to the imposition of appropriate conditions linked to the relevant phases to ensure that a surface water drainage scheme be submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate the use of sustainable drainage systems in

accordance with the London Plan drainage hierarchy that shows the development will (a) provide at least 3,650m3 of attenuation capacity and (b) achieve greenfield runoff rates in 1 in the 100 year storm event (plus 40% allowance for climate change). The scheme shall be accompanied by details of the monitoring and maintenance regime to ensure the long term efficacy of the surface water drainage scheme.

Phase 1 - Hospital Development - Foul Water Drainage
Thames Water has provided a response to the planning application raising concerns over the capacity in the foul drainage network. The response is not sufficiently detailed to fully understand the extent of concerns and they have not responded to attempts to resolve the problems.

Thames Water, as the statutory foul drainage provider, is legally obliged to ensure capacity in the network for new developments and this is secured through required infrastructure charges.

Furthermore, the applicant has confirmed that the level of foul water discharge will be comparable between the current hospital and the redevelopment. This is because the new hospital although larger, will have more modern servicing that provides a more efficient base case. Consequently, there is no detailed evidence presented that indicates the new hospital could not achieve a suitable foul drainage solution.

A condition is therefore necessary to secure a foul water drainage scheme be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of the discharge rates and requirements, the capacity of the receiving network and detailed plans and drawings showing connections to the wider network.

Phase 2 - Residential Development - Foul Water Drainage
No information is yet available in relation to the Phase 2 development and therefore a similar condition to the one above is recommended for Phase 2 to ensure that the development achieves an effective foul drainage solution.

Subject to the above conditions being attached to any grant of planning consent, the proposed scheme is deemed to be in accordance with Policies SI12 and SI13 of the London Plan (2021), 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).

7.18 Noise or Air Quality Issues

NOISE

Policy D13 of the London Plan (2021) places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

Policy D14 of the London Plan (2021) states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
1) avoiding significant adverse noise impacts on health and quality of life
2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable

restrictions on existing noise-generating uses
4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquility)
5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

The application site has numerous noise sources including traffic from surrounding roads. Whilst a noise assessment has been submitted, officers have identified a number of areas where further details are required and conditions are therefore necessary to secure a well-designed and acoustically sound development proposals within the detailed and outline phases of the development.

Subject to meeting these requirements which will be secured by condition the proposal would accord with Policies D13 and D14 of the London Plan and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

AIR QUALITY
Policy SI 1 'Improving air quality' of the London Plan (2021) states:
A Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.
B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:
1) Development proposals should not:
a) lead to further deterioration of existing poor air quality
b) 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
c) create unacceptable risk of high levels of exposure to poor air quality.
2) In order to meet the requirements in Part 1, as a minimum:
a) development proposals must be at least Air Quality Neutral
b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures
c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
d) development 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.
C Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:
1) how proposals have considered ways to maximise benefits to local air quality, and
2) what measures or design features will be put in place to reduce exposure to pollution,

and how they will achieve this.
D In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.147
E Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

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 proposed development is located within the London Borough of Hillingdon Air Quality Management Area (AQMA), and within Hillingdon Hospital Focus Area, originating air pollutant emissions which will add to current poor air quality in the area. Proposals are required to improve air quality within Focus Areas.

As per the London Plan and LBH Local Action Plan 2019-2024, developments need to be air quality neutral as minimum and air quality positive in Focus Areas, contributing to the reduction of air pollutant emissions in these sensitive locations. The London Borough of Hillingdon 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.

The Council's Air Quality Officer has reviewed the proposals and provided detailed comments on both phases of the development.

For the proposals for Phase 1 (the detailed element of the planning application) mitigation measures to reduce emissions are required due to location of the proposed development. These can be applied on-site or off-site. The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

Given the opening year of 2027, and due to the nature of the proposed development

(hospital), the fleet composition can be easily managed through contractual procedures and was assumed that after 2030 the proposed hospital would be in full alignment with the Mayor's vision to have a fully electric London fleet after 2030.

The level of mitigation required for Phase 1 of the proposed development once all standard deductions are applied is £19,985. the applicant has agreed to pay this sum.

The proposals for Phase 1 include four diesel fired standby generators located to the south of the hospital building. With the exception of testing, the generators are intended solely for emergency use and will not be used for commercial power generation. Excluding an emergency, the generators are anticipated to operate for up to 14 hours per year for testing consisting of, 1 hour per month for 11 months and 3 hours for one month. The London Air Quality Neutral draft guidance states that, "Backup plant installed for emergency and life safety power supply, such as diesel generators, may be excluded from the calculation of predicted building emissions. Normally, it would be expected that the use of these generators for anything other than an emergency and operational testing (less than 50 hours per year) would be prevented by planning condition."

Therefore, in this instance, the backup plant to be installed for life saving emergency power supply (diesel generators), have been excluded from the calculation of predicted building emissions, subject to a condition controlling annual hours of use.

The GLA have also reviewed the submitted details from an Air Quality perspective and requested further information in terms of trip rates. These details have been provided and the GLA have confirmed agreement that the scheme is acceptable.

Therefore, for Phase 1 a section 106 agreement with the contribution of £19,985 is required 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 terms of Phase 2, the outline element of the proposals for residential (Class C3) and supporting uses (Class E), the proposed development is not air quality neutral, with the traffic information available at this stage. With the provided information it is not possible to reasonably ascertain the impact of the proposed development on air quality. The level of mitigation required for the outline phase of the proposed development for traffic emissions is calculated on the data currently available to be £618,447 to £763,058, based on a number of assumptions. In the calculations undertaken, 2027 was assumed as the opening year. Should the opening year be sooner, the damage cost will be significantly higher. It was also assumed that between 2030 and 2040 50% of the cars would be electric. Should this not be the case the damage cost will increase to £763,058. After 2050 all cars were assumed to be electric.

As all of the required variables to calculate the required mitigation are not known at this stage, any air quality contribution for the outline element of the proposals is to be agreed at the detailed stage so that that the applicant has the opportunity to offer suitable and appropriate mitigation which is not possible to be envisaged/designed at the outline stage of the application. This approach is in accordance with the Mayor of London Air Quality guidance. The Section 106 agreement attached to any grant of planning permission will therefore need to capture the need for any contribution, whilst also enabling sufficient flexibility for the final level to be calculated once details are known. Once all mitigation has been agreed under the Air Quality Positive Statement at the detailed stage, the remainder

would be secured by a s106 legal agreement.

In addition to securing the above contributions within a s106 legal agreement, conditions are recommended to be attached to any grant of planning consent. It is recommended that both phases of the development provide a Low Emission Strategy and details for Reducing Emissions from Demolition and Construction. It is also recommended that Phase 1 is required to provide an Emission Reduction and Management Plan for approval in writing by the LPA. The GLA have also requested a condition securing appropriate London Non-Road Mobile Machinery (NRMM), this condition is also proposed to be attached with details required for both phases.

Subject to the above, the application is considered to be in accordance with Policy SI 1 'Improving air quality' of the London Plan (2021), Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020).

7.19 Comments on Public Consultations

Where comments raised relate to material planning considerations they have been discussed 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

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

On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is only considered reasonable to request contributions towards the following:

Phase 1

1. Hospital Expansion Area Protection for future hospital expansion only;

2. Temporary visitor and Staff Parking Scheme;

3. Hospital Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such as matters as: 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;

4. Financial contribution of £6,000 towards Santander (or equivalent) Cycle Hire Scheme;

5. Wayfinding Contribution of £29,000;

6. Provision on site of 4 car club spaces;

7. Bus Stop Infrastructure, including Section 278 works to the public highway and a contribution of up to £250,000 for works within private land;

8. Financial contribution of £4,553,445 towards a Carbon Offset Fund at £90/tonne and/or a revised energy strategy delivering more on-site carbon saving OR an equivalent scheme for another NHS site in the borough/directly adjoining borough;

9. Financial contribution of £19,985 towards mitigating the impact of the development on air quality;

10. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances;

11. Public Open Space to remain unrestricted in perpetuity;

12. Maintain an operational hospital at all times within the application site boundary;

Phase 2

13. On-site Affordable Housing of 54% (by hab room) with a Tenure split of 70% intermediate and 30% affordable rent. This shall include an Early Stage Viability Review mechanism as defined by Policy H5 of the London Plan (2021);

14. Residential Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such as matters as: 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;

15. Financial contribution of £12,000 towards Santander (or equivalent) Cycle Hire Scheme;

16. Wayfinding Contribution £18,500;

17. Carbon Offset contribution. In the event that the reserved matter applications are not net zero a carbon offset payments shall be paid to the Council's carbon offset fund;

18. Air Quality Contribution: Subject to the submission of an updated AQA alongside the reserved matters application, damage costs shall be paid at reserved matters stages, as identified by the updated AQA;

19. Parking Permits: The residents of this development will not to be eligible for future parking permits within any future Parking Management Areas and Council car parks in the vicinity of the site, apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions;

20. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances;

21. Public Open Space of 4590 sqm to remain unrestricted in perpetuity;

22. London Healthy Urban Development Unit (HUDU) contribution of £578,038;

23. On site car club of 2 spaces, free membership for 3 years plus £50 credit for one person in each unit;

Phase 1 and Phase 2

24. Road Ownership/Bus Lease Arrangements - To allow access through the site for buses/grant TfL a license or lease to run bus services through the site, including:
- The agreement of the detailed specification for the roads in which buses will operate along to be agreed with the Council, in consultation with TfL
- Appropriate agreement to cover the provision and cost of works required to facilitate the provision of road infrastructure that allows for safe and efficient two-way bus movement through the site. The appropriate agreement will also include a Safety Audit for the road infrastructure in which buses will run along, with a commitment to address all concerns raised within this Audit
- Clause to restrict occupation of the Phase 2 until highway works to facilitate new bus route into the site have been implemented
- To construct the roads in which buses will operate along to adoptable standards
- Submission and agreement of an Operating and Maintenance Plan for the roads in which buses will operate along by the Council, in consultation with TfL;

25. Financial contribution of £561,625 towards improvements to the Public Realm/Active Travel Zones (sum to be divided between Phase 1 and 2);

26. Secure all necessary highway works including written agreement from the Local Planning Authority (Section 278/S38);

27. Financial contribution towards Water Infrastructure;

28. Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

The scheme would also be liable to pay Mayoral CIL at a rate of £60 per square metre (plus indexation) and Hillingdon's Community Infrastructure Levy of £95 per square metre (plus indexation) for residential development.

7.21 Expediency of enforcement action

Not applicable to application.

7.22 Other Issues

INFRASTRUCTURE ASSESSMENT
Policy D2 of the London Plan (2021) states that an unallocated site that may cause planned infrastructure capacity to be exceeded might need to provide additional infrastructure proportionate to the development. In respect of the impact upon infrastructure, the proposal will generate Hillingdon and Mayoral CIL contributions from those elements of the scheme to which CIL is applicable to fund the provision of infrastructure. A comprehensive set of planning obligations are also to be secured by a Section 106 legal agreement if recommended for approval. Accordingly, the proposal is considered to comply with policy D2 of the London Plan (2021).

EQUALITIES IMPACT ASSESSMENT
London Plan (2021) Objective GG1 highlights the diverse nature of London's population and underscores the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies in the exercise of their functions to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Given that the development involves the delivery of a replacement hospital, with a new approach to providing acute hospital services, an Equalities Impact Assessment (EqIA) has been prepared in support of the application. The assessment considers the potential impact of the proposal on equalities target groups including age, disability, pregnancy and maternity, gender, race, religion or belief, and sexual orientation. Officers are mindful of the obligations under the Equalities Act 2010.

The Equalities Impact Assessment (EQiA) outlines the quality and equality analysis for the hospital redevelopment outline business case. It details the analysis by groups and makes recommendations for the continual assessment of impact as the programme develops in order to appropriately explore any potential impacts and identify mitigations to support

equity and quality to patient, carers and staff groups.

The quality and equality considerations outlined show there are a wide range of equality issues relating to the proposed hospital redevelopment. The developing plans described are to ensure continued positive impact on all groups and address any possible negative impact that may arise as a result of the planned redevelopment.

Officers consider that the submitted EQiA is a comprehensive and robust assessment and that there are significant benefits to the existing and future residents and wider community. The Council's Equalities and Wellbeing Manager has reviewed the submitted EQiA and confirmed that it is acceptable.

FIRE SAFETY
Policy D12 Fire safety of the London Plan (2021) 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.

Where development comprises a "relevant building", as defined by the guidance, a Fire Statement must be submitted as part of any relevant planning application setting out the fire safety considerations specific to the development proposals and the Health and Safety Executive have been consulted directly.

In accordance with the London Plan (2021) Policy D12, a Fire Statement has been submitted for Phase 1 and an Outline Fire Statement submitted for Phase 2.

The Fire Statement submitted for both phases set out the scope of the fire safety considerations and the design objectives, which in this instance are driven by a statutory obligation to protect people in and around the building in so far as these can reasonably be established at the project planning stage.

The Fire Statements for the phases both concludes that the currently established design proposals are a suitable basis from which to develop the fire strategy to ultimately demonstrate that the functional requirements of Part B (Fire Safety) of the Building Regulations can be met.

The London Fire Brigade were consulted on the proposals and they have provided a response confirming they have no objections to the application.

Therefore, subject to a condition requiring the submission of a Fire Strategy for approval for each phase, the application is considered to be in accordance with Policy D12 Fire safety of the London Plan (2021).

OVERHEATING
Policy SI 4 of the London Plan (2021) states:
A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
2) minimise internal heat generation through energy efficient design;
3) manage the heat within the building through exposed internal thermal mass and high ceilings;
4) provide passive ventilation;
5) provide mechanical ventilation; and
6) provide active cooling systems.

If recommended for approval, it is recommended that an Overheating Strategy that is in accordance with the requirements of Policy SI 4 of the London Plan (2021) for Phase 2 of the development should be secured by condition.

Subject to such a condition, the application is considered to accord with Policy SI 4 of the London Plan (2021).

HEALTH (PHASE 2)

Paragraph 92 of the NPPF (2021) states that planning decisions should aim to achieve healthy, inclusive and safe places which:
c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

Paragraph 93 of the NPPF (2021) states that planning decisions should:
b) take into account and support the delivery of local strategies to improve health, social

and cultural well-being for all sections of the community.

Policy GG3 of the London Plan (2021) states that in order to improve Londoners' health and reduce health inequalities, those involved in planning and development must:
a) ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities
b) assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities
c) plan for appropriate health and care infrastructure to address the needs of London's changing and growing population

Policy CI1 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations.

Paragraph 7.2 of the Hillingdon Local Plan: Part 2 (2020) also states that there is a particularly pressing need in the Borough for additional health care facilities to address higher than expected birth rates and an increase in the older population.

The floorspace occupied by the proposed affordable housing in Phase 2 is not liable to Community Infrastructure Levy. Accordingly, the The London Healthy Urban Development Unit (HUDU) Planning Contributions Model has been used to assess the health service requirements and cost impacts of the development. In this instance a financial contribution of £578,038 is required as part of the Section 106 legal agreement.

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 is a hybrid planning application for the redevelopment of the Hillingdon Hospital site. Full planning consent is sought for Phase 1, which is the demolition of existing buildings in the western part of the site (excluding the Tudor Centre and the Old Creche) and redevelopment 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, public open space, utilities, servicing area, surface car park/expansion space and other works incidental to the proposed development. The new Hospital building would have a maximum height of 8 storeys and a gross internal floor area of 79,594sqm. The proposed Multi-Storey Car Park would have an internal area of 23,034sqm and would provide 942 car parking spaces and 336 long-stay and 56 short-stay cycle parking spaces.

Outline planning consent, with all matters reserved except for access, is also applied for Phase 2, which is the demolition of buildings and structures on the remaining area of the site (excluding the Grade II Listed Furze) for a mixed-use development comprising 327 residential units (Use Class C3) and 800sqm of supporting Commercial, Business and Service uses (Class E), new pedestrian and vehicular access; public realm, amenity space plus car and cycling parking.

The two-phase approach proposed within the application is considered to be acceptable. There is a requirement to provide continuous care on the site and therefore to build a new Hospital whilst maintaining the current buildings and services. The application therefore proposes that a new Hospital building and supporting multi storey car park (MSCP) be constructed to the west of the wider hospital site, with the majority of this area currently being surface level car parking. If granted planning consent, then once the new Hospital building and MSCP have been constructed, the existing hospital buildings would be demolished, and public open space and residential buildings brought forward.

The existing hospital site has been developed on an adhoc and piecemeal basis since the 1940s rather than being planned based on the needs of the hospital at different times. The submission includes details of the existing buildings on the site, with most of the buildings (81%) now classed as either in a 'poor' or 'bad' state and that the continual upkeep of the buildings is a huge ongoing cost that is impacting on the quality of care that can be given to patients.

The Trust have outlined that at the heart of the proposals, is a shared vision of providing improved access to better healthcare services in a new fit for purpose hospital on the Hillingdon Hospital site. The Trust, working with partners across the community, seek to improve care and help avoid unnecessary hospital stays.

The Trust plan to provide the same range of services that are currently available at the hospital, but in a high quality, purpose-built facility. In designing the new facility, the Trust seek to work with its partners across the health and social care system to improve the integration of care across the borough and beyond. There is undoubtedly a need for a new hospital in Hillingdon, given that the life of the Hillingdon Hospital estate has largely expired. The optimisation of the existing hospital site through the construction of a new hospital on the western extent of the site would allow the rest of the site to be cleared for other land uses such as residential in line with local, regional and national planning policies.

The application sets out the key benefits of the new Hillingdon Hospital to be:
- A more attractive environment for staff and patients, improving their experience
- Full compliance with the latest safety standards
- Better connectivity between departments making it easier for patients to move through the hospital
- Greater adoption of digital technologies to enhance patient care and safety
- Improved privacy with significantly more side rooms
- A more energy efficient building
- Inclusion of areas to benefit the wider community, including public open spaces
- Flexibility to adapt facilities in response to potential future pandemics
- Support the integration of care and wellbeing across North West London and support the wider local economy through the creation of local jobs.

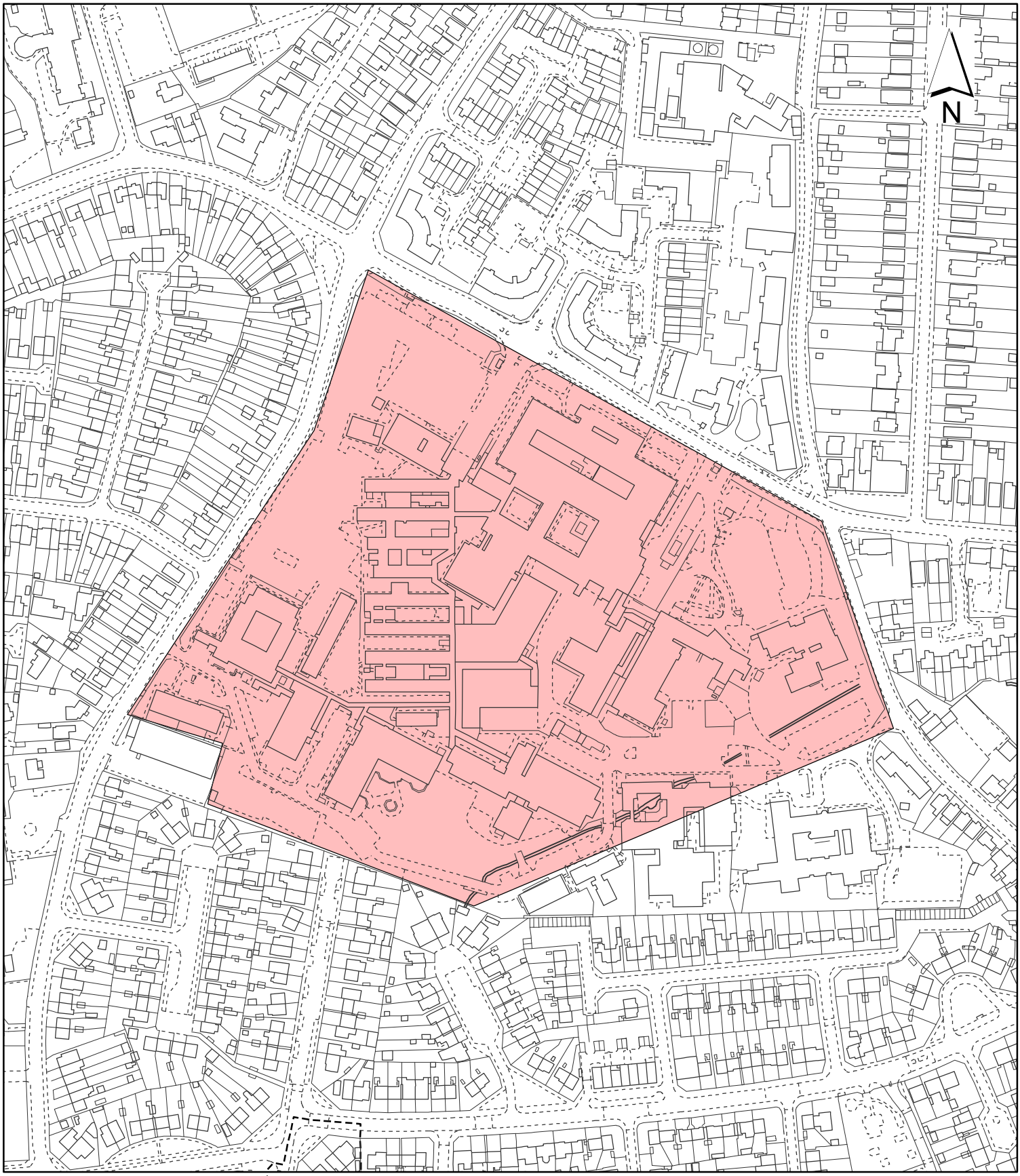
The principle of a new hospital building and additional residential units is widely supported and, subject to a s106 legal agreement to secure the obligations to mitigate the impact of the proposals and the planning conditions required as set out within this report, it is recommended that the application be approved.

11. Reference Documents

National Planning Policy Framework (July 2021)
The London Plan (March 2021)
Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

Hillingdon Local Plan: Part 2 - Site Allocations (January 2020)
Accessible Hillingdon Supplementary Planning Document (September 2017)
Planning Obligations Supplementary Planning Document (July 2014)
GLA Play and Informal Recreation (SPG) 2012
GLA Housing (SPG) 2016
GLA Affordable Housing Viability (SPG) 2017
GLA Mayor's Transport Strategy 2018
GLA Draft Good Quality Homes for All Londoners SPG (October 2020)

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Notes:

Site boundary

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Hillingdon Hospital

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Planning Application Ref:
4058/APP/2022/1788

Scale:
1:3,000

Planning Committee:
Major

Date:
January 2023

HILLINGDON
LONDON