



HILLINGDON  
LONDON



# Major Applications Planning Committee

**Date:** WEDNESDAY 19  
FEBRUARY 2020

**Time:** 6.00 PM

**Venue:** COMMITTEE ROOM 5 -  
CIVIC CENTRE, HIGH  
STREET, UXBRIDGE

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

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camera and scan the code below:



## To Councillors on the Committee

Councillor Edward Lavery (Chairman)  
Councillor Steve Tuckwell (Vice-  
Chairman)  
Councillor Janet Duncan  
Councillor Martin Goddard  
Councillor John Morgan  
Councillor John Morse  
Councillor John Oswell  
Councillor Henry Higgins  
Councillor Carol Melvin BSc (Hons)

**Published:** Tuesday 11 February 2020

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Putting our residents first

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

# Useful information for residents and visitors

## *Watching & recording this meeting*

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

Watch a **LIVE** broadcast of this meeting on the Council's YouTube Channel: *Hillingdon London*

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



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

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

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

## *Accessibility*

For accessibility options regarding this agenda please contact Democratic Services. For those hard of hearing an Induction Loop System is available for use.

## *Emergency procedures*

If there is a FIRE, you will hear a continuous alarm. Please follow the signs to the nearest FIRE EXIT and assemble or the Civic Centre forecourt.

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# A useful guide for those attending Planning Committees

## Petitions, Speaking and Councillors

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

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

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

## How the meeting works

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

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

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

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

The procedure will be as follows:-

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

## How the Committee makes decisions

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

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

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

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

# Agenda

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## CHAIRMAN'S ANNOUNCEMENTS

- 1 Apologies for Absence
- 2 Declarations of Interest in matters coming before this meeting
- 3 To sign and receive the minutes of the previous meetings 1 - 6
- 4 Matters that have been notified in advance or urgent
- 5 To confirm that the items marked in Part 1 will be considered in public and those items marked in Part 2 will be heard in private

## PART I - Members, Public and Press

Items are normally marked in the order that they will be considered, though the Chairman may vary this. The name of the local ward area is also given in addition to the address of the premises or land concerned.

### Major Applications with a Petition

	Address	Ward	Description & Recommendation	Page
6	Little Britain Lake, Packet Boat Lane, Cowley  52368/APP/2017/1844	Uxbridge South	Proposed footbridge over the River Colne at the north end of Little Britain Lake.  <b>Recommendation: Approval</b>	7 – 40  346 – 352



## Major Applications without a Petition

	Address	Ward	Description & Recommendation	Page
7	Former Master Brewer Site, Freezeland Way, Hillingdon  4266/APP/2019/3088	Hillingdon East	Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, green spaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.  <b>Recommendation: Refusal</b>	41 – 164  353 – 370
8	Bourne Court Site, Ruislip  11891/APP/2019/3855	South Ruislip	Deed of Variation to Section 106 Schedule 1 (Affordable Housing) associated with planning permission ref: 11891/APP/2018/3414, dated 17/06/19 (Redevelopment to provide 87 residential units in two blocks, together with associated access, car and cycle parking; communal and private amenity space; and landscaping) to remove the requirement for a commuted sum and replace it with an affordable housing obligation for an on-site provision with 54 shared ownership units in Block A and 33 affordable rented units in Block B.  <b>Recommendation: Approval + Sec 106</b>	165 – 176  371 – 374

9	Cranford Park, Hayes 14009/APP/2019/4088	Heathrow Villages	<p>The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works.</p> <p><b>Recommendation: Approval</b></p>	<p>177 – 214</p> <p>375 – 395</p>
10	Cranford Park, Hayes 14009/APP/2019/4090	Heathrow Villages	<p>The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works (application for listed building consent).</p> <p><b>Recommendation: Approval</b></p>	<p>215 – 230</p> <p>396 – 397</p>

11	<p>Bridge House, Uxbridge</p> <p>40050/APP/2019/1865</p>	Uxbridge South	<p>Section 73 application to vary the approved plans list condition of application reference 40050/APP/2017/2438 dated 01/09/2017 for (Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to residential units (Class C3) together with ancillary car parking, cycle storage and waste and recycling storage (as amended by application reference 40050/APP/2019/3869 dated 21/01/20).</p> <p>The amendments to the approved plans propose: No longer including the 6th floor of Bridge House (7 x 1 bedroom units) and allow the change in the mix of units at Bridge House from 9 x Studios and 114 x 1 bedroom units to 16 x studios, 43 x 1 bedroom units and 56 x 2 bedroom units.</p> <p><b>Recommendation: Approval + Sec 106</b></p>	<p>231 – 248</p> <p>398 – 402</p>
12	<p>19-22 Chippendale Way, Uxbridge</p> <p>67544/APP/2019/1978</p>	Uxbridge North	<p>Erection of a block of 12 No. flats comprising of 7x1 bed, 4x2 bed and 1x3 bed apartments with associated parking, landscaping, access and amenity.</p> <p><b>Recommendation: Approval</b></p>	<p>249 – 284</p> <p>403 – 408</p>
13	<p>Battle of Britain Museum and Visitor Centre, Wren Avenue, Uxbridge</p> <p>585/APP/2019/3868</p>	Uxbridge North	<p>Proposed landscaping improvement works including surface water flood mitigation using new rain gardens, reshaping of existing bund, new tree planting and new car park spaces with associated works.</p> <p><b>Recommendation: Approval</b></p>	<p>285 – 308</p> <p>409 – 414</p>

14	The Arena, Stockley Park  37800/APP/2019/3278	Botwell	Alterations to car parking and erection of 2 substations storage/plant room  <b>Recommendation: Approval</b>	309 – 324  415 – 419
15	Uxbridge Mortuary, Kingston Lane, Hillingdon  13102/APP/2019/3950	Brunel	Proposed two single storey side and rear extension to existing Mortuary Building, relocation of existing rooftop plant, new rooftop plant, shielding housing for rooftop plant, installation of roof canopy, installation of 1100mm high safety railing to the rooftop, relocation of the fence and associated works.  <b>Recommendation: Approval</b>	325 – 344  420 – 429
16	PART 1 - Plans for Major Applications Planning Committee			345 – 430

## Minutes



### MAJOR APPLICATIONS PLANNING COMMITTEE

16 January 2020

Meeting held at Council Chamber - Civic Centre, High Street, Uxbridge

	<b>Committee Members Present:</b> Councillors Eddie Lavery (Chairman), Steve Tuckwell, Janet Duncan, Martin Goddard, John Morse, John Morgan, Henry Higgins and Carol Melvin
95.	<b>ELECTION OF VICE-CHAIRMAN</b> ( <i>Agenda Item 1</i> )  <b>RESOLVED: That Councillor Tuckwell be elected as Vice-Chairman of the Major Applications Planning Committee.</b>
	The meeting, which commenced at 9.00 pm, closed at 9.05 pm.

These are the minutes of the above meeting. For more information on any of the resolutions please contact Neil Fraser on 01895 250692. Circulation of these minutes is to Councillors, Officers, the Press and Members of the Public.

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## Minutes



### MAJOR Applications Planning Committee

22 January 2020

Meeting held at Committee Room 5 - Civic Centre, High Street, Uxbridge

	<p><b>Committee Members Present:</b> Councillors Eddie Lavery (Chairman), Steve Tuckwell (Vice-Chairman), Mohinder Birah, Janet Duncan, Martin Goddard, Henry Higgins, Carol Melvin, John Morgan and John Morse</p> <p><b>LBH Officers Present:</b> Meghji Hirani (Planning Contracts &amp; Planning Information), Mandip Malhotra (Strategic and Major Applications Manager), Richard Michalski, Kerrie Munro, Liz Penny (Democratic Services Officer) and James Rodger (Head of Planning, Transportation and Regeneration)</p>
96.	<p><b>APOLOGIES FOR ABSENCE</b> (<i>Agenda Item 1</i>)</p> <p>Apologies were received from Councillor John Oswell with Councillor Mohinder Birah substituting.</p>
97.	<p><b>DECLARATIONS OF INTEREST IN MATTERS COMING BEFORE THIS MEETING</b> (<i>Agenda Item 2</i>)</p> <p>There were no declarations of interest.</p>
98.	<p><b>TO SIGN AND RECEIVE THE MINUTES OF THE PREVIOUS MEETING</b> (<i>Agenda Item 3</i>)</p> <p>Councillor Janet Duncan enquired why her apologies had not been recorded in the minutes of the meeting dated 18 December 2019. Democratic Services confirmed that apologies had not been received prior to said meeting therefore Councillor Duncan had been marked absent.</p> <p><b>RESOLVED That: the minutes of the meeting dated 18 December 2019 be approved as an accurate record.</b></p>
99.	<p><b>MATTERS THAT HAVE BEEN NOTIFIED IN ADVANCE OR URGENT</b> (<i>Agenda Item 4</i>)</p> <p>None.</p>
100.	<p><b>TO CONFIRM THAT THE ITEMS MARKED IN PART 1 WILL BE CONSIDERED IN PUBLIC AND THOSE ITEMS MARKED IN PART 2 WILL BE HEARD IN PRIVATE</b> (<i>Agenda Item 5</i>)</p> <p>It was confirmed that all items were marked Part 1 and would be considered in public.</p>



101. **RURAL ACTIVITY GARDEN CENTRE, YIEWSLEY - 68554/APP/2019/3071** (*Agenda Item 6*)

**Erection of two single storey buildings to provide café, sales area, agricultural barn, access, car parking and associated works.**

Officers introduced the application, highlighted the information in the addendum and made a recommendation for approval subject to conditions.

It was noted that the proposal was considered to be inappropriate development within the Green Belt as it did not comply with national and local policies. However, the application was deemed to be acceptable due to very special circumstances with regard to design, impact on the street scene, amenity, highways, refuse, landscaping, ecology, flooding, energy, noise, air quality, contamination and security matters.

It was confirmed that a Sequential Site Assessment had been carried out as indicated on page 35 of the agenda pack. Members were advised that there were eight Adult Learning Centres in the Borough including the Rural Activity Garden Centre; however, investigations had concluded that there were no alternative suitable sites within the Council's adult learning portfolio where the proposed facilities and courses could be accommodated. The Committee was informed that amended plans had been submitted during the application process in order to minimise the harm posed to the Green Belt. In the revised plans, the proposed buildings had been moved to the southernmost part of the site, there had been a reduction in height, increased screening and the number of car parking spaces had been reduced significantly. An amendment to Condition 12 as indicated in the addendum was also highlighted.

Committee Members praised the excellent work carried out at the Centre and agreed that the very special circumstances requirement had been met in this case. In response to Councillors' questions, it was confirmed that, if approved, this development would not set a precedent as no future application would be recommended for approval if the special circumstances criteria were not met. Additional concerns were raised regarding the potential impact on the environment in this highly polluted area. It was confirmed that the trees to be removed as part of the scheme would be replaced, together with additional planting to mitigate the environmental impact. Members were advised that Condition 7 (landscaping) could be strengthened to ensure this. Members enquired whether the disabled parking spaces indicated on the plan could be located on the same side as the building rather than opposite it. It was acknowledged that this would not be possible since the area in question would be used for an outdoor display. However, there appeared to be a footpath on the plans with a shared surface – Councillors requested that the use of this area be explored further.

The officer's recommendation was moved, seconded and, when put to a vote, unanimously agreed, subject to the changes in the addendum and the conditions highlighted in the report.

**RESOLVED That:**

- 1) the application be approved subject to the conditions highlighted within the report and addendum;**
- 2) delegated authority given to the Head of Planning to investigate and secure via amended plan relocation of disabled parking;**
- 3) Condition 7 (landscaping) be strengthened to include pollution absorbent planting.**

102.	<b>GETHCELN HOUSE, HAYES - 71737/APP/2019/1979</b> ( <i>Agenda Item 7</i> )
	<p><b>Proposed demolition of existing office and warehouse/workshops and erection of one flexible use class B1(c)/B2/B8 building comprising 3 units with associated access and parking.</b></p> <p>Officers introduced the application, highlighted the information in the addendum and made a recommendation for approval. It was noted that a previous application received in 2018 had been refused for six reasons; said reasons for refusal had been addressed in the new application. It was confirmed that Heavy Goods Vehicles (HGVs) would be within the site and would not be allowed to pile up on Dawley Road. The site would not be used as a data centre.</p> <p>Councillors enquired whether it would be feasible to condition the site to use a low or zero emission fleet within a given timescale. It was noted that Condition 12 referenced the Low Emission Strategy. In relation to the HGVs themselves, it was confirmed that the technology did not yet exist to facilitate the charging of electrical heavy goods vehicles. Members were informed that Condition 8 highlighted a requirement for landscaping plans to include pollution absorbing and native planting species. For clarity, it was agreed that 'NB' be removed from said Condition. The Committee requested that the possibility of restricting the idling of HGVs be considered and, if appropriate, Condition 12 be amended accordingly.</p> <p>The officer's recommendation was moved, seconded and, when put to a vote, unanimously agreed subject to the changes in the addendum and the conditions highlighted in the report.</p> <p><b>RESOLVED That:</b></p> <ol style="list-style-type: none"> <li><b>1) the application be approved subject to the changes in the addendum and the conditions highlighted in the report;</b></li> <li><b>2) delegated authority be granted to the Head of Planning to further explore the possibility of restricting the idling of HGVs and, if appropriate, amend Condition 12 accordingly; and</b></li> <li><b>3) delegated authority be granted to the Head of Planning to remove the 'NB' from Condition 8 in relation to landscaping plans.</b></li> </ol>
103.	<p><b>GEORGES YARD, HAREFIELD - 2078/APP/2019/150</b> (<i>Agenda Item 8</i>)</p> <p><b>Retention of two agricultural barns and change of use of one to equestrian use and formation of a riding arena with associated internal and external alteration and hardstanding works.</b></p> <p>Officers introduced the application, highlighted the information in the addendum and recommended approval.</p> <p>It was noted that the application site lay within the Green Belt; however, the development was considered appropriate, hence a sequential test had been unnecessary in this case. In response to questioning from Members, it was confirmed that Condition 4 would inhibit potential commercial use in the future.</p> <p>The officer's recommendation was moved, seconded and, when put to a vote, unanimously agreed subject to the changes in the addendum and the conditions highlighted in the report.</p>

	<b>RESOLVED That: the application be approved subject to the changes in the addendum and the conditions highlighted in the report.</b>
104.	<p><b>20 WATFORD ROAD AND 1 BROOKDENE DRIVE, NORTHWOOD - 71665/APP/2019/2293</b> (<i>Agenda Item 9</i>)</p> <p><b>Demolition of two detached dwellings and erection of 1 new building to provide 12 residential apartments with alterations to existing vehicular accesses, on site parking, bin and cycle storage and amenity space.</b></p> <p>Officers introduced the report and highlighted the information in the addendum. It was noted that, externally, the proposed development was identical to that approved in March 2018 with no alterations in terms of bulk, scale, mass and form. However, Members were informed that the application sought to create 3 additional units by altering the unit mix to include 6 x 1 bed units, 5 x 2 bed units and a 1 x 3 bed unit. This was considered to be acceptable.</p> <p>Councillors requested further clarification regarding the internal mix of units and enquired whether it was feasible to incorporate 12 units rather than the original 9 planned for. The Committee was advised that the original 9 units would have been reasonably large; however, the proposed 12 units still met the Council's minimum size requirements. It was confirmed that the new proposal incorporated one affordable housing unit.</p> <p>Members expressed concern that the proposed amenity space appeared cramped and the communal space would be sited at a road junction with high levels of pollution. However, it was noted that the planning inspector's report had found the proposed development to be satisfactory. Members were obliged to accept this decision.</p> <p>The officer's recommendation was moved, seconded and, when put to a vote, agreed subject to the changes in the addendum and the conditions highlighted in the report, with 7 Members voting in favour and 1 abstention.</p> <p><b>RESOLVED: That the application be approved subject to the changes in the addendum and the conditions highlighted in the report.</b></p>
	The meeting, which commenced at 6.00 pm, closed at 6.50 pm.

These are the minutes of the above meeting. For more information on any of the resolutions please contact Liz Penny on 01895 250185. Circulation of these minutes is to Councillors, Officers, the Press and Members of the Public.

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

## Report of the Head of Planning, Transportation and Regeneration

**Address** LITTLE BRITAIN LAKE PACKET BOAT LANE COWLEY

**Development:** Proposed footbridge over the River Colne at the north end of Little Britain Lake.

**LBH Ref Nos:** 52368/APP/2017/1844

**Drawing Nos:** Ecological Mitigation and Management Enhancement Plan, November 2019  
Preliminary Ecological Appraisal, November 2017  
Flood Risk Assessment For Proposed Footbridge On River Colne Adjacent To Little Britain Lake At Cowley  
Phase 2 Ecological Surveys & Assessment, February 2019:  
2017D217P002  
Design & Access Statement (Including Heritage and Flood Risk Statements)  
2017D217P003  
2017D217P004  
2017D217P005  
2017D217P001

**Date Plans Received:** 19/05/2017

**Date(s) of Amendment(s):**

**Date Application Valid:** 24/05/2017

### 1. SUMMARY

Members may recall that this application for a footbridge over the River Colne by Little Britain Lake to an island referred to as 'Little Britain Island' (also referred to locally as 'Huntsweir Island') was originally presented to the Major Applications Planning Committee at its meeting on 2nd August 2017, when Members resolved that the application should be deferred in order to allow for a further ecology impact report that considered all the local wildlife on the island, together with further clarification to confirm that the bridge height would not lead to further flooding.

An initial Preliminary Ecological Appraisal, November 2017 was undertaken, followed by a Phase 2 Ecological Surveys & Assessment, February 2019 and then an Ecological Mitigation and Management Enhancement Plan, November 2019 (EMMP).

The surveys demonstrate that when combined with the ecological mitigation and enhancement works put forward in the EMMP, that there will be no adverse impact on any protected species and that overall, together with a condition to restrict access over the footbridge onto the island to only those involved with ecology and water management / maintenance, the islands biodiversity would be safeguarded.

As was mentioned in the previous officer's committee report, the main need for a new footbridge is in order to allow Environmental Agency (EA) officers and other relevant waterway management operatives direct access to Huntsmoor Tilting Weir sited some 50m to the north of the proposed footbridge without having to cross privately owned land.

For the reasons advanced in this report, the proposed footbridge continues to be considered appropriate development within the Green Belt and it has been sympathetically

designed and modestly sized and would not overlook or impede upon the nearest neighbouring residential property at Huntsmoor Weir.

The bridge is also considered acceptable in terms of the flood risk.

It is therefore considered that the proposed footbridge constitutes acceptable green belt development and would not have any detrimental visual or amenity impact.

## **2. RECOMMENDATION**

**APPROVAL subject to the following:**

### **1 SP01 Council Application Standard Paragraph**

This authority is given by the issuing of this notice under Regulation 3 of the Town and Country Planning General Regulations 1992 and shall enure only for the benefit of the land.

### **2 COM3 Time Limit**

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

#### **REASON**

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

### **3 COM4 Accordance with Approved Plans**

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

2017D217P001;  
2017D217P002;  
2017D217P003;  
2017D217P004;  
2017D217P005;

and shall thereafter be retained/maintained for as long as the development remains in existence.

#### **REASON**

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and the London Plan (March 2016).

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

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

- Design and Access Statement (Including Heritage, Flood Risk and Accessibility Statements);
- Flood Risk Assessment For Proposed Footbridge On River Colne Adjacent To Little Britain Lake At Cowley;
- Preliminary Ecological Appraisal, November 2017;
- Phase 2 Ecological Surveys & Assessment, February 2019; and
- Ecological Mitigation and Management Enhancement Plan, November 2019

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

#### REASON

To minimise the impact of flooding on users of the bridge and to minimise the impact of the proposed development on the surrounding area. To comply with Policy 5.13 of the London Plan (March 2016) and to ensure the development does not increase the risk of flooding in compliance with Policy EM6 in the Hillingdon Local Plan: Part 1 Strategic Policies (November 2012), Policy 5.12 of the London Plan (March 2016) and the National Planning Policy Framework (NPPF) and to ensure that the scheme maintains and enhances the biodiversity of the area, in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part Two - Development Control Policies (January 2020).

#### **5 NONSC Detailed Design and Flood Mitigation**

Prior to the commencement of works on site:-

- i) Final details of the design of the bridge and ramp provision, showing appropriate levels of flood mitigation if necessary shall be submitted to and approved by the Local Planning Authority,
- ii) The soffit level must be set at 27.72 metres AOD or above.

#### REASON:

To minimise the impact of flooding on the surrounding area to comply with Policy 5.13 of the London Plan (March 2016) and to ensure the development does not increase the risk of flooding in compliance with Policy EM6 of the Hillingdon Local Plan: Part One: - Strategic Policies (November 2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part Two: - Development Management Policies (January 2020) and Policy 5.12 of the London Plan (March 2016) and National Planning Policy Guidance (February 2019) and the Planning Practice Guide (March 2014).

#### **6 COM7 Materials (Submission)**

No development shall take place until details of the colours of the external finish to the bridge have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

#### REASON

To ensure that the development presents a satisfactory appearance in accordance with Policies DMHB 4, DMHB 11 and DMEI 4 of the Hillingdon Local Plan: Part Two - Development management Policies (January 2020).

#### **7 RES25 No floodlighting**

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. 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 and of the rural nature of the surrounding green belt in accordance with Policies DMHB 4, DMHB 11 and DMEI 4 of the Hillingdon Local Plan: Part Two - Development management Policies (January 2020).

## **8 COM10 Tree to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the 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 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 Two - Development Management Policies (January 2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

## **9 COM8 Tree Protection**

No site clearance or construction work shall take place until the details 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.



#### 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 Two - Development Management Policies (January 2020).

#### **10 NONSC Access**

Notwithstanding the plans hereby approved, the access point onto the footbridge hereby approved shall be secured by a locked gate at all times, together with other appropriate security measures/ arrangements that would prevent the locked gate from being by-passed. The details of the proposed gate and lock/fob access and other security details shall be submitted to and approved in writing by the Council and thereafter implemented prior to first use of the footbridge. The gate and other security details shall be retained in perpetuity.

Unless otherwise agreed in writing by the Local Planning Authority, the Council's Green Spaces Team shall control access onto the footbridge onto Little Britain Island for the purposes of ecology and water management/maintenance (including access by persons employed by the Environment Agency or their sub contractors) and for no other purpose.

#### REASON:

In order to safeguard a wide diversity of wildlife on the existing semi-natural habitat of the site in accordance with policy DMEI 7 and DMEI 8 of the Hillingdon Local Plan: Part Two (Jan 2020) and the London Plan (2016) Policy 7.19.

#### **11 NONSC Access/Management/Maintenance Plan**

Prior to the first use of the footbridge hereby approved, a Management Plan shall be submitted to and approved in writing with the Local Planning Authority. The details of this plan shall include, but not be limited to the following:

- Installation of Signage to prevent unauthorised access onto the Island
- Installation of signage to prevent access for dogs at any time;
- Maintenance and management programme of the site
- Access arrangements for maintenance and management of Little Britain Island
- Authorised persons to undertake the necessary management, maintenance and survey work
- A programme for ecological surveys with works undertaken and results reported to the Local Planning Authority within a period of time to be agreed as part of the management plan
- Method statements for the protection of flora and fauna once the site is accessed

Access onto the Island shall only be for the purposes of ecology surveys, management and maintenance of the Island and connected weir by authorised persons and for no other purposes.

#### REASON:

In order to safeguard a wide diversity of wildlife on the existing semi-natural habitat of the site in accordance with Policies DMEI 7 and DMEI 8 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and Policy 7.19 of the London Plan (March 2016).

#### **12 NONSC CEMP**

Before the development hereby approved commences, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local

Planning Authority. The CEMP shall comprise such combination of measures for controlling the effects of construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including, but not limited to the phasing of the works, hours of work, working practices, plant and equipment use (including robust justification if any lighting is proposed), waste management, site remediation, construction materials deliveries, tree protection and ecological mitigation (including measures to minimise disturbance of the river sediment). It will ensure appropriate communication with, the distribution of information to, the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. All demolition, construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA.

#### REASON:

To safeguard the amenity of surrounding areas in accordance with Policies DMHB 11 and DMEI 4 of the Hillingdon Local Plan: Part Two - Development management Policies (January 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 Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) 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.

NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
LPP 2.18	(2016) Green Infrastructure: the multi functional network of open and green spaces
LPP 5.12	(2016) Flood risk management
LPP 6.10	(2016) Walking
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.8	(2016) Heritage assets and archaeology
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.

LPP 7.16	(2016) Green Belt
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.21	(2016) Trees and woodlands
LPP 7.24	(2016) Blue Ribbon Network
LPP 7.27	(2016) Blue Ribbon Network: supporting infrastructure and recreational use
LPP 7.28	(2016) Restoration of the Blue Ribbon Network
LPP 7.30	(2016) London's canals and other rivers and waterspaces
DMHB 1	Heritage Assets
DMHB 2	Listed Buildings
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMT 6	Vehicle Parking

### 3

The Environment Agency advise that the Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environmentagency.gov.uk](mailto:enquiries@environmentagency.gov.uk).

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

### 4

The Environment Agency advise that their approval is required for the use of herbicides in or near water. This is to ensure that the herbicides will not have a detrimental effect on the riverine habitat. A copy of the application form can be found at <https://www.gov.uk/government/publications/application-to-use-herbicides-in-or-nearwater>.

**5                    115                    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](http://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.

**6                    132                    Trees in a Conservation Area**

As the application site is within a conservation area, not less than 6 weeks notice must be given to the Local Planning Authority of any intention to cut down, top, lop or uproot or otherwise damage or destroy any trees on the application site. Please contact the Trees & Landscape Officer, Residents Services, 3N/02, Civic Centre, Uxbridge, UB8 1UW for further advice.

**7                    143                    Keeping Highways and Pavements free from mud etc**

You are advised that care should be taken during the building works hereby approved to avoid spillage of mud, soil or related building materials onto the pavement or public highway. You are further advised that failure to take appropriate steps to avoid spillage or adequately clear it away could result in action being taken under the Highways Act 1980.

**8                    145                    Discharge of Conditions**

Your attention is drawn to conditions 5, 6, 9 and 11 which must be discharged prior to the commencement of works. You will be in breach of planning control should you commence these works prior to the discharge of this/these condition(s). The Council may consider taking enforcement action to rectify the breach of this condition(s). For further information and advice contact - Residents Services, Civic Centre, Uxbridge, UB8 1UW (Tel: 01895 250230).

**9                    147                    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).

## **10**

The applicant is advised that the submitted ecology report(s) describe the proposal as including the provision of fishing platforms but these have not been shown on any submitted plan and therefore do not form part of the proposal.

### **3. CONSIDERATIONS**

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

The application site spans a back channel in a braided section of the River Colne between the north western corner of the Little Britain Lake area of public open space and a densely wooded crescent shaped island within the river. Approximately 50m to the north, on the eastern side of the island, the river runs over a weir known as Huntsmoor Tilting Weir which includes an access footbridge, which is sited beside a former mill house that now forms part of the curtilage of a Grade II Listed residential building known as Huntsmoor Weir located on the eastern bank of the river.

The naturally formed island covers some 1.8ha and it does not appear to have a name, but is referred to as 'Little Britain Island' and locally as 'Huntsmoor Island' to which there is no direct access by the public. It is within the ownership of the Council as is Little Britain Lake, which was formed by gravel extraction, and its banks are followed by a public footpath with adjacent green space including wooded margins and picnic areas.

The surrounding area is rural in nature and characterised by rivers and lakes which are generally bordered by trees and woodland. Packet Boat Lane and Old Mill Road are the only nearby roads and both are narrow and tree lined and, as such, do not compromise the rural nature of the surroundings. There is the occasional building which are sporadically positioned and are well screened by trees so as not to appear unduly disruptive within this rural setting. The Grade II Listed Huntsmoor Weir house is located close by to the north.

The site forms part of the designated Green Belt, the Cowley Lock Conservation Area and the Little Britain Nature Conservation Site of Metropolitan or Borough Grade I Importance. The boundaries of the Nature Conservation Site and Conservation Area roughly correspond to the area extending to the north, east and south, between the River Colne and the Grand Union Canal to the east. On the western side of the island, the R. Colne channel forms the Borough boundary with land to the west falling under the jurisdiction of South Bucks District Council.

#### **3.2 Proposed Scheme**

Permission is sought for the erection of a timber arched footbridge to provide pedestrian access from the north western corner of the Little Britain Lake to Little Britain Island / Huntsmoor Island which will allow the Environment Agency and any other relevant waterway management operatives direct access to the weir to the north without having to cross privately owned land (the Design and Access Statement does also mention access

for the general public, but for the reasons cited in this report, public access is not considered appropriate).

The bridge would be accessed from the existing footpath that extends around Little Britain Lake which is itself, accessed from Old Mill Road.

The span of the bridge would be 21 metres with the walkway width being 1.5 metres. The walkway would be bordered by painted steel railings which would be 1.4 metres in height and every eighth vertical rail would feature oak cladding. Oak handrails will be mounted on top of the railings on both sides. The walkway would not feature any steps and would be finished with an anti-slip surface along its length. The drawing indicates that the intention is to stand the bridge on foundation pads sited between the trees.

The D & A Statement advises that 'The construction of the footbridge is a co-venture between the Council and The Environment Agency and the key reason in installing the bridge is primarily to service the Weir and Mill House. The Mill House owned by the Environment Agency is located within the privately owned land known as Hunstmoor Weir. Prior permission is required from the owners of the land as there is no way leave for access to the Mill House and Weir.'

The application is supported by the following documents:-

Design and Access Statement:

This describes the site and its surroundings, together with the proposed development. It advises the proposal to build a footbridge will help to open the use of the isolated island to the general public and offer alternative unrestricted access to the historic Mill House and regular maintenance of the weir. It goes on to list the submitted plans and specialist statements included in the statement and provides commentary on the location and design of the bridge, noting that the position of the bridge was chosen to avoid the need to fell any trees. The statement then goes on to provide brief heritage, flood risk and accessibility statements.

Flood Risk Assessment for Proposed Footbridge on River Colne adjacent to Little Britain Lake at Cowley:

This provides the background to the proposal, advising that the Environment Agency operate a flood defence structure known as Hunstmoor Tilting Weir upstream of the proposed bridge on the back channel that once provided water power for the now defunct Hunstmoor Mill. The weir comprises of a fishpass, a fixed crest weir and the hydraulically powered tilting weir and its function is to regulate the upstream water level by constantly monitoring it and adjusting the crest height automatically with its control kiosk on the island bank which is reached via the weir's footbridge through the private garden of Hunstmoor Weir which is no longer viable. It goes on to advise of the design measures incorporated into the bridge to mitigate water impedance, including that the soffit level would be raised above the bank crests to 27.72mAOD and the bridge is arched above this level so that the 1:1000 level of 26.89mAOD would be exceeded and the bridge would be elevated high enough so as not to impede high flows. The bridge's 2m set back from the bank and its open design would allow flows under and through the bridge.

Preliminary Ecological Appraisal, November 2017:

This describes the aims of the study, the site and the appraisal methodology, comprising a desk study and an extended Phase 1 Habitat Survey. Relevant local planning policy is briefly discussed and surrounding statutory and non-statutory designated sites of nature conservation importance are identified. The report defines the site / study area as being

'the island, river habitat running either side of the island and approximately 10m of habitat running along the east bank of the River Colne, alongside the island, in the zone where the bridge is proposed'. The results of the Extended Phase 1 Survey are presented, with 5 types of habitat found, comprising broad-leaved semi-matural woodland; tall ruderal; river; amenity grassland and hard-standing. The report goes on to discuss the flora and fauna found on or potentially supported by the site. The report provides a preliminary prediction of the impacts of the development and recommends mitigation and enhancement measures. It concludes by advising that although the proposals offer only minor changes to the site, due to its undisturbed nature, any change in recreational pressure may constitute a significant effect. It therefore recommends that multiple phase 2 ecological surveys and assessments are carried out to establish the current ecological baseline for the site and to guide any necessary mitigation / compensation. As the site is designated a SINC and contains habitats of high ecological value, it recommends that an Ecological Mitigation and Management Plan (EMMP) is also produced, which would detail the ongoing management and monitoring of the site should the proposals be undertaken, to ensure there are no significant adverse effects and that sensitive working practices during construction and during the operation of the site are adopted.

#### Phase 2 Ecological Surveys & Assessment, February 2019:

This provides an introduction to the report, describes the study's methodology and constraints and the Stage 2 Surveys and Assessments undertaken, as advised by the Preliminary Ecological Appraisal, namely a botanical walkover survey (which also noted that there was evidence of flytipping and human activity scattered throughout the island), and badger, bat roosting, breeding and wintering bird, fish and white-clawed crayfish, invertebrate, water vole and otter surveys. The report notes that bat activity surveys were not considered necessary as the proposed works are minimal and there are no lighting constraints. The report goes on to present the results of the various surveys undertaken and concludes by advising that mitigation and enhancement works to safeguard the SINC, priority habitats and protected and notable species are set out within an EMMP.

#### Ecological Mitigation and Management Enhancement Plan, November 2019 (EMMP):

This provides an introduction and outlines the aims of the document and provides a summary of existing ecological features. It goes on to describe the proposed works, including the installation of fishing platforms and footpaths that would be installed in areas of low ecological value within the woodland and be confined to the southern section of the site with footpaths being constructed of bark / woodchip and following existing natural pathways. The plan then goes on to describe the potential impacts and the mitigation and enhancement works that are required for the wider SINC, woodland and river habitats and then the potential impacts and mitigation and enhancement works required for the individual protected and notable species found or potentially supported on site, both at the construction and operational phases.

#### Officer's Note

Although the EMMP describes the proposal as including fishing platforms, these have not been shown on any submitted plan and therefore do not form part of the proposal. An informative has been added to this effect.

### **3.3 Relevant Planning History**

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

There is no relevant planning history on the site.

### **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 - Consolidated With Alterations (2016)

The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

#### Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

#### Draft London Plan (Intend to Publish Version December 2019)

The Greater London Authority (GLA) consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

The Mayor has considered the Inspectors' recommendations and, on the 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor does not wish to accept. On the 23rd December 2019, the Secretary of State outlined that a response will be due on or before 17th February 2020.

Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the Intend to Publish version of the Plan. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

##### Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM3	(2012) Blue Ribbon Network
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.HE1	(2012) Heritage
PT1.T1	(2012) Accessible Local Destinations

#### Part 2 Policies:

NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
LPP 2.18	(2016) Green Infrastructure: the multi functional network of open and green spaces
LPP 5.12	(2016) Flood risk management
LPP 6.10	(2016) Walking
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.8	(2016) Heritage assets and archaeology
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.16	(2016) Green Belt
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.21	(2016) Trees and woodlands
LPP 7.24	(2016) Blue Ribbon Network
LPP 7.27	(2016) Blue Ribbon Network: supporting infrastructure and recreational use
LPP 7.28	(2016) Restoration of the Blue Ribbon Network
LPP 7.30	(2016) London's canals and other rivers and waterspaces
DMHB 1	Heritage Assets
DMHB 2	Listed Buildings
DMHB 4	Conservation Areas

DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMT 6	Vehicle Parking

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

- 5.1** Advertisement Expiry Date:- **12th July 2017**
- 5.2** Site Notice Expiry Date:- Not applicable

3rd July 2017

## 6. Consultations

### External Consultees

1 adjoining neighbour was originally consulted on the proposal and a site notice was posted adjacent to the car park on Old Mill Road which serves visitors to Little Britain Lake and a notice was also published in the local press.

1 letter of objection was received - summary provided below:-

- (i) There is a deed in place allowing the Environment Agency access to the weir from Old Mill Road,
- (ii) The island is called Huntsmoor Island not Little Britain Island,
- (iii) No notice was sent to any other property,
- (iv) There was no consultation with neighbours,
- (v) The Mill House is a privately owned and occupied building and the Design and Access Statement says the footbridge will allow access to it,
- (vi) There are no pathways or street lighting in the surrounding area and there is already an adequate picnic area, toilet facilities and limited car parking available,
- (vii) Visitor numbers are low except on fun days when there is congestion on the roads and damage to the verge,
- (viii) There is a growing concern of anti-social behaviour,
- (ix) The island is isolated with no public access and is a sanctuary for wildlife, plants and trees,
- (x) There are two known badger setts and a number of kestrel nests on the island,
- (xi) The proposal will encroach an area reserved for wildlife and there is no public requirement for expansion of the picnic area,
- (xii) The site is located in Flood Zone 3 and not 2 as stated in the application and there is significant risk of flooding,
- (xiii) There would be desecration and destruction to the island in order to provide footpaths.
- (xiv) There is insufficient car parking,
- (xv) Will not be in keeping with surroundings and will harm neighbour amenities,
- (xvi) Will impact upon the character and setting of a Listed Building,
- (xvii) Issue of the public purse and cost benefit details have not been provided.

A further 64 page letter from the objector was circulated to some Members of the Committee as reported on the Addendum sheet of the 2/8/17 committee. The previous Addendum states that this replicates information already sent to the Planning Team and all the issues raised in the correspondence were taken into account during the officer's assessment of the scheme.

### ENVIRONMENT AGENCY:

I confirm based on the FRA we have no objection to the proposed development. The site is located within Flood Zone 3, the bridge is classified as water compatible development with a design life of up to 100 years, and as such should not inhibit a design flow of 1:100 plus a 25% climate change allowance. The plans indicate that the bridge soffit will be 27.72mAOD, being above the 1:1000 flood level of 26.89mAOD and 300mm above the higher upstream bank top of 27.4mAOD. As the abutments shall be set back two metres from each bank edge there will be no reduction in channel capacity through the cross section.

Under the terms of the Environmental Permitting Regulations a Flood Risk Activity Permit is required from the Environment Agency for any proposed permanent or enabling works or structures, in, under, over or within eight metres of the top of bank of the River Colne, designated a 'main river'. Details of lower risk activities that may be Excluded or Exempt from the Permitting Regulations can

be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Please contact us at [PSO-Thames@environment-agency.gov.uk](mailto:PSO-Thames@environment-agency.gov.uk) for further information. The applicant will need to demonstrate:

- That access to the watercourse is not restricted for future maintenance or improvement works.
- That works will not obstruct flood flows thereby increasing the risk of flooding to nearby properties around Hartham Common and its locality.
- That works will not adversely affect the construction and stability of the river bank.
- That all the conditions/requirements of the Flood Risk Activity Permit are met.

Water voles (protected species under the Wildlife and Countryside Act) are known to be in the catchment, both upstream and downstream of the site. Part of the ecological information required for the Flood Risk Activity Permit will be for a water vole survey on the riparian areas affected by the works. This survey should be done in the same season as the works are proposed, in order to be valid. If burrows and presence are identified, this must be used to inform the method statement and demonstrate how no contravention of legislation will occur.

EA letter dated 16/8/17:

This advises that for some time, the EA have been negotiating with the objectee/ land owner the extent of the right of way set out in his objection as the objectee has claimed that the right has been extinguished because it has been eroded by the action of the river and has refused us permission to use this right to access the weir for our flood management work. They have consequently served notices to access the weir through another route across his land under section 172 of the Water Resources Act 1991. Continuing to gain access through what can be expensive, time consuming formal legal means is unfortunate and may prove to be unsustainable. We believe the additional alternative access (the proposed bridge) will have minimal, if any, adverse environmental impact and is very important to help facilitate our regular flood risk management activities in the area.

IVER PARISH COUNCIL:

No objection - will improve public appreciation and access to site.

Following the previous committee meeting on 2/8/17, 5 additional neighbouring responses were received, objecting to the proposal on the following grounds (summary):-

(xviii) Before approving a public bridge to this isolated island, which has no physical access except by boat or across the weir, a wildlife impact assessment should be undertaken to understand the threat to biodiversity, which is likely to be unique, certainly for London,

(xix) Island site enriches the surrounding lake and it should be allowed to remain as a nature reserve without public access as there is no path or right of way on the island and also no need for vehicles or machinery to be brought onto the island as this would require additional pathway to be cut through the trees to get to the weir,

(xx) Would result in litter in this unspoilt place,

(xxi) If lose this undisturbed habitat, it will be gone forever and likely to become a youth congregation area attracting out of hours anti-social behaviour.

HERTFORDSHIRE AND MIDDLESEX WILDLIFE TRUST:-

This application proposes to introduce unknown, but likely to be substantial, levels of disturbance to a historically undisturbed environment. This will inevitably lead to an erosion of its biodiversity value due a combination of human disturbance, dog and cat access, trampling effects, tree felling and reduction due to safety concerns, and potentially anti social behaviour such as fire lighting.

NPPF states that development must conserve and enhance biodiversity as one of its three central tenets. It also states in paragraph 118 that:

'When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;'

Introducing potentially high levels of disturbance to a pristine, undisturbed environment will inevitably lead to a significant decline in the biodiversity value of the island. It is entirely avoidable in the terms of NPPF by not building this unnecessary bridge to facilitate detrimental public access. Places of environmental value where human disturbance is absent are so rare that it would be a tragedy if this refuge was also lost.

HMWT therefore object to this application because we believe it is unnecessary and patently not compliant with the aims of NPPF to conserve and enhance biodiversity.

It would be a terrible shame to lose this unique, special wildlife refuge and we urge you to refuse this unjustified application.

Following the receipt of the Ecological Reports, a further round of consultation was undertaken with the neighbouring property and those that had previously commented on the application, together with the statutory consultees.

A total of 2 petitions, one with 108 signatories, the other with 150 signatories, have been received from different petition organisers, both object to the proposals in their entirety (one also mentions that public funds would be better spent on maintaining the current location and facilities) for the following reason:-

'Objection to planning application 52368/APP/2017/1844 in relation to the proposed footbridge over the River Colne to an uninhabited island occupied only by nature and wildlife and to preserve biodiversity and ecology. The Council needs to mitigate the current loss of habitat at the HS2 site 3.5 miles to the north and the Heathrow Expansion project 2.8 miles to the south of this island by simply leaving this island alone and allowing the environment and nature to take its course, notwithstanding the fact that the said island lies within a Green Belt and Cowley Lock Conservation Area.'

In addition to the original objection letter which has been re-submitted, a further 273 responses from individuals have been received, 271 in opposition and 2 in support, making the following comments:-

Objection comments (summary)

Ecology

(xxii) Building a bridge to an island which is relatively well protected from disturbance from people and dogs (unless swimming) will cause unforeseen damage to an already fragile habitat with human disturbance and predator introduction that will destroy wildlife / drive animals away. The ecosystem(s) at Little Britain Lake, including the river and its uninhabited islands are precious for wildlife and this island should be left alone. People, unintentionally (letting dogs off leads etc) or otherwise, will ruin it so we have a duty to preserve the island's inaccessibility as a safe haven for wildlife,

(xxiii) Nation's wildlife and that of the world needs protecting now more than ever with species extinction and climate change. Seemingly, small decisions have added up to create the current biodiversity crisis in this country and around the world, so we should be protecting and expanding all our green space, especially wild space, not disrupting and damaging it,

(xxiv) Given the Council are due to debate declaring a climate and ecological emergency,

applications such as this can only call the integrity of the Council into serious doubt. If we are declaring a climate emergency then we should be protecting areas of biodiversity, as their loss is not good for climate change,

(xxv) Areas where species are allowed to thrive without human interference are becoming increasingly valuable,

(xxvi) Heathrow expansion and HS2 are having such a major impact(s) on the surrounding areas and every area of untouched nature should be treasured,

(xxvii) No building should take place without careful consideration as the repercussions are irreversible and once lost, these small sanctuaries are difficult if not impossible to retrieve,

(xxviii) With everyone destroying their front gardens for paving and cars, trees being taken down, where will our wildlife live?

(xxix) Hillingdon Council and the Environment Agency have previously accepted that the best management of this site was to save money by allowing natural processes and wildlife to take their course. It will be of greater benefit to future generations if this is continued,

(xxx) There is a huge shortage of places where birds can nest and breed safely away from foxes, dogs, cats and humans. The exclusion signs might keep the humans out but the birds breeding would be seriously impaired. The ecologists involved should have vetoed the idea of a bridge. A point about mitigation is that it is usually far inferior to what it is supposed to replace, eg natural undisturbed ecology (which is an invaluable resource this close to London). However, removing Himalayan Balsam and clearing Pennywort is a good idea if done sensitively,

(xxxi) The ecological services company who LBH have employed for this work have been at the centre of two recent instances regarding work for HS2. On two occasions HS2 have had to issue public apologies for eco service work being carried out implicitly without due regard for licence conditions and/or wildlife and ecological legal protections. All work involving this company should be reviewed,

(xxxii) An environmental assessment impact has not been undertaken,

(xxxiii) The council's ecological survey for the project states, "The habitats on site offer high ecological value, supported by the general lack of human disturbance and the matrix of habitats present... These habitats are considered to potentially be of value up to the County / District level." The ecologists spotted holts for otters, traces of amphibians, bats, birds and small mammals, and they warn the council about the likelihood of vandalism of rare plants - "Although the development proposals are minor, the disturbance effects are likely to be high." This should not be pursued and is not 'Putting our residents first',

(xxxiv) There is no need to go onto the island as wildlife can be viewed from afar and the lake provides plenty of walks and views and there are plenty of public green parks nearby,

(xxxv) Many species on island can not be relocated,

(xxxvi) Not only are we clearly advised by the United Nations through the IPCC Report that this project is pure folly, but we are in a Borough beset by the enormous challenges of HS2 and Heathrow expansion, and dreadful destruction and degradation of an environment that nourishes not just us, but the whole of London. The stupidity, the recklessness, the utter disregard for our children and their future will be met with anger, derision and very stern opposition,

(xxxvii) Hillingdon has little better to commend it than the wonderful mosaic of habitats that make for far and away the most biodiverse area of London. This is one quiet solace, one retreat for that nature that we have no need or reason to destroy,

(xxxviii) Cannot see how the bridge will advance the area as compared to the damage it will do to the environment,

(xxxix) The application was originally made back in 2017 without any foresight and consideration of how much damage it would cause to the environment and wildlife that live on the island and how much it will cost,

(xl) The river itself holds specimen barbel and this will impact their habitat,

Character/ Amenity

(xli) Proposal will urbanise the area which is both Green Belt and a conservation site,

(xlii) This is one of the last public lakes in the Colne valley that is considered a park environment,



- (xliii) The rural feeling of this area is gradually being eroded by new buildings. It should not become a park purely for the pleasure of human beings, it must stay a wildlife sanctuary,
- (xliv) Bridge will be a major eyesore in this beautiful wild environment,
- (xlv) LBH Healthy Walkers group regularly walk around Little Britain, a haven of tranquility and peace in our community which will be upset by the bridge,
- (xlvii) The peace and beauty of the area should not be interfered with as it is good for well being and mental health at a time when properties are being built everywhere and our towns are getting busier and louder,
- (xlviii) Our environment is changing rapidly in Hillingdon for the worse. This borough is building so much that we are going to be living in an overpopulated environment in which nature is being squeezed out. At least leave this small area alone for the wildlife to live in peace even if you won't let us residents do the same, it is one of the few good things we have in Cowley,
- (xlviii) Our disabled child is taken for almost daily walks around the lake which are very important to us due to the wonderful nature in the built up area and the opportunity this provides for learning about the natural world,
- (xlix) Anti-social behaviour such as flytipping, rubbish, lighting fires, drug abuse, speeding cars on surrounding roads which can be threatening will only be made worse by the bridge by extending the publically accessible area. As it is, rubbish etc. is only removed due to actions of locals / Facebook 'Friends of Little Britain Lake' group,
- (l) Problems of anti-social behaviour is reported to LBH but not attended to,
- (li) The lake is not policed enough and needs baliff / covert camera(s) installing,
- (lii) Building bridge will generate traffic,

#### Other

- (liii) Bridge has not been needed to date and is not necessary now. A dead end bridge will not benefit the community and there are ample fishing platforms around the lake, so that adding extra ones is not sufficient public interest to justify the biodiversity damage that would be caused,
- (liv) Waste of resources and tax payers money and it is us, the residents, that will ultimately foot the bill for the bridge via our council tax contributions. There can be no real financial, social or political gain from such a pointless loss of wildlife habitat,
- (lv) Money would be better spent upgrading services or other facilities elsewhere such as making roads and streets safer that are useful to the community, helping families who are suffering financially or go towards projects that improve the environment, for instance, to clear invasive pennywort or providing kingfisher boxes etc and support for the wildlife currently being displaced by the so called 'necessary' HS2 destructive works further up the river or to take more effective action against fly tippers in this area,
- (lvi) Island should not be treated as some local tourist attraction or asset,
- (lvii) In my area (my house backs on to the river Frays) a similar application for a bridge was made - neighbours objected - all to no avail as planning permission was granted. The bridge has been abandoned because the subsequent application to further develop the island was blocked,
- (lviii) I am a 14 year old who is scared about the climate emergency and what my future and my childrens' future holds. I shouldn't be scared that my children will grow up in a world of toxins, ash and extinction and the need to fix climate change is urgent,
- (lix) Nature has no voice, it is entirely at our mercy

#### Comments in general support:-

- (lx) The potential impact of opening this island to the public must be considered in depth. It could be a valuable resource for the community as long as it's use is monitored and the relevant authorities use the development as an opportunity to encourage biodiversity,
- (lxi) Proposal is a good idea - need to get on and do these things as we elected you to make these decisions.

#### ENVIRONMENT AGENCY:

We are supportive of the submitted Preliminary Ecological Appraisal and would recommend the inclusion of the below informatives.

#### Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environmentagency.gov.uk](mailto:enquiries@environmentagency.gov.uk).

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

#### Herbicides

Our approval is required for the use of herbicides in or near water. This is to ensure that the herbicides will not have a detrimental effect on the riverine habitat. A copy of the application form can be found at

<https://www.gov.uk/government/publications/application-to-use-herbicides-in-or-nearwater>.

#### NATURAL ENGLAND:

##### Further comments:

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 16 June 2017.

The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

##### Original comments:

Statutory nature conservation sites - no objection

Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

##### Protected species

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in

respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Priority Habitat as identified on Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006

The consultation documents indicate that this development includes an area of priority habitat, as listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. The National Planning Policy Framework states that 'when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.'

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](http://data.gov.uk) website.

Officer Note:

Natural England's standing advice on protected species provides general guidance on the assessment of a site's likely ability to support protected species in the absence of detailed ecological surveys.

CANAL AND RIVER TRUST:

This application falls outside the notified area for its application scale and there is no requirement for you to consult us in our capacity as a Statutory Consultee.

COLNE VALLEY PARK:

The Colne Valley Park CIC exists to maintain and enhance the Colne Valley as the first taste of countryside to the west of London for the benefit of more than three million people who live within 10 miles of the Park. The six objectives of the Park are:

1. To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.
2. To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning

the value of the countryside.

6. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

On the face of it this proposal to create a bridge across to the island looks positive for the Colne Valley in line with our recreation objective. However, the island is small so one has to query the cost/benefit analysis. This bridge will only maximise its potential for the Colne Valley Regional Park if a subsequent bridge is put across the western branch of the Colne to create an attractive circular walk from Iver Lane, past Little Britain, across the river by the ford then back up footpath IV28.

There may be impact on biodiversity - although minor and this is addressed through the proposed mitigation. A planning obligation should be imposed that the bridge, paths and mitigation measures described in the 'ecological mitigation & management enhancement plan' are to be maintained in the long term (ie at least 20 years) If the Council is minded to approve this application we would wish the points above to be considered.

#### THREE RIVERS DISTRICT COUNCIL:

The development would not have an impact on the district of Three Rivers District Council.

#### HERTFORDSHIRE AND MIDDLESEX WILDLIFE TRUST:

This application proposes to introduce unknown, but likely to be substantial, levels of disturbance to a historically undisturbed environment. This will inevitably lead to an erosion of its biodiversity value. The ecological information supplied attempts to mitigate this by measures such as a no dogs policy, signage alerting public to ecological value, access restrictions at night and no access to half of the island. This looks reasonable on paper but the likely reality will be that it will not be enforced and people will ignore the signage. It is too great a risk to take for such limited benefits to people.

NPPF states that development must conserve and enhance biodiversity as one of its three central tenets. It also states in paragraph 118 that:

'When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;'

Introducing potentially high levels of disturbance to a pristine, undisturbed environment will inevitably lead to a significant decline in the biodiversity value of the island. It is entirely avoidable in the terms of NPPF by not building this unnecessary bridge to facilitate detrimental public access. Places of environmental value where human disturbance is absent are so rare that it would be a tragedy if this refuge was also lost.

HMWT therefore object to this application because we believe it is unnecessary and patently not compliant with the aims of NPPF to conserve and enhance biodiversity.

It would be a terrible shame to lose this unique, special wildlife refuge and we urge you to refuse this unjustified application.

#### HILLINGDON GROUP OF LONDON WILDLIFE TRUST:

The mitigation and management proposals seem appropriate, but we want to underline the importance of ensuring that the proposed 'undisturbed' area is kept as such for the benefit of wildlife, especially birds. It could easily be abused if not monitored and corrective action taken when necessary.

## **Internal Consultees**

### **COMMENTS ON THE ORIGINAL SUBMISSION:-**

#### **FLOOD AND WATER MANAGEMENT OFFICER:**

There are no objections in principle to the proposed bridge subject to the construction of the bridge in accordance with the flood risk information set out in the Design and Access Statement.

#### **TREES / LANDSCAPE OFFICER:**

This site is occupied by public open space at the north end of Little Britain Lake and just south of Huntsmoor Weir on part of the River Frays.

The area is close to a small car park on Old Mill Lane and a circular footpath around the lake. The area lies within designated Green Belt and the Cowley Lock Conservation Area - a designation which protects trees.

#### **Comment**

The proposal to provide a pedestrian footbridge across the Frays to Little Britain Island will land close amid the tree-lined embankment on the island. While there is no topographic or arboricultural impact assessment to confirm that it is feasible to land the bridge on the island without affecting trees, the drawing indicates that the intention is to land between the nearest trees. It is also understood that trees on the island are due to be thinned / managed in the interest of good arboricultural practice.

#### **Recommendation**

No objection subject to conditions COM8, COM9 (part 1, 2 and 5) and COM10.

#### **CONSERVATION / URBAN DESIGN OFFICER:**

The site lies within the Cowley Lock CA and also within the proposed Colne Valley APZ. It is not considered that the proposal would detract from the character or appearance of this part of the conservation area. As such, no objections are raised to the proposals, the structure of the bridge should be painted in appropriate colours, to be covered by condition.

### **FURTHER COMMENTS FOLLOWING RECEIPT OF ECOLOGICAL REPORTS:-**

#### **TREES / LANDSCAPE OFFICER:**

This site is occupied by public open space at the north end of Little Britain Lake and to the south of Huntsmoor Weir on the River Frays.

The area on the east bank is close to a small car park on Old Mill Lane and a circular footpath around the lake. The site to the west of the Frays comprises a wooded island.

The site lies within designated Green Belt and the Cowley Lock Conservation Area - a designation which protects trees. The site sits within the Little Britain SINC of Metropolitan Importance.

#### **Comment**

The proposal to provide a pedestrian footbridge across the Frays to Little Britain Island will land close amid the tree-lined embankment on the island.

An ecological report by SES, dated November 2019, confirms that habitats will be retained and the work will comprise small-scale low impact work, with vegetation clearance limited to saplings and small areas of brush. The report identifies potential impacts associated with the construction and operational phases of development and proposes items of mitigation and enhancement for the site.

There is no topographic or arboricultural impact assessment to confirm that it is feasible to land the bridge on the island without affecting trees, the drawing indicates that the intention is to land the bridge on foundation pads between the nearest trees.

Subject to good construction management and methodology it should be possible to construct the pads without damaging the trees. The pre-fabricated bridge will then be craned into position, an operation which will also require careful control to prevent damage to the bridge or nearby trees.

Recommendation

No objection subject to conditions COM8, COM9 (part 1, 2 and 5) and COM10.

FLOOD AND WATER MANAGEMENT OFFICER::

The Environment Agency lead on the response on applications on a main river and within the floodplain.

There are no objections in principle to the proposed bridge for access purposes subject to the detail of the design and flood risk mitigation proposed such as raising the soffit of any bridge above the 1 in 1000 year flood levels to limit impact on the river corridor.

ACCESS OFFICER:

I have considered the detail of this planning application and deem there to be no accessibility issues raised by the proposal.

HIGHWAY ENGINEER:

No comment.

## **7. MAIN PLANNING ISSUES**

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

The site is located within the Green Belt and is therefore subject to strict controls in relation to new development.

Paragraph 143 of the National Planning Policy Framework (NPPF) (February 2019) advises that 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances' and at paragraph 144, '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.' Paragraph 145 goes on to advise that the construction of new buildings should be regarded as inappropriate in the Green Belt and then goes on to list the various exceptions to this general directive. Paragraph 146 advises that 'certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it', and then lists the other forms of appropriate development, which at c) includes 'local transport infrastructure which can demonstrate a requirement for a Green Belt location'.

Policy 7.16 of the London Plan (March 2016) and Policies EM2 of the Hillingdon Local Plan: Strategic Policies (November 2012) and DME1 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) re-emphasise and support national policy objectives in terms of the protection of the Green Belt.

The site is also located within the Colne Valley and forms part of the wider Blue Ribbon Network. One of the key strands of Policy EM3 of the Local Plan: Part 1- Strategic Policies (November 2012) is to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through such

management plans as the Biodiversity Action Plan and to achieve this, the Council will work with the Environment Agency and other interested bodies to continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals.

The proposed footbridge is intended to provide the Environment Agency and any other relevant waterway management operatives direct access to the nearby weir adjacent to the island without having to cross privately owned land for maintenance and servicing requirements. Therefore, the bridge's Green Belt siting can not be avoided. The requirement for the bridge to preserve the openness of the Green Belt and for it not to conflict with the purposes of including land within it are discussed in the sections below.

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

Not relevant to this application.

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

The previous officer's report to committee advised:-

'The proposed bridge has a low profile and would be well screened by surrounding trees. The design is simple and unobtrusive and the use of timber handrails and cladding creates a traditional appearance that is compatible with historic features within the surrounding area as well as its overall rural nature.

Given its modest size and the amount of screening surrounding it, it is not considered that the bridge will adversely impact upon the setting of the neighbouring Grade II Listed Building at Huntsmoor Weir.'

The site does form part of the Colne Valley Archaeological Priority Zone but given the limited nature of the proposed bridge works, means of construction and siting within a meandering river, it is highly unlikely that the bridge's construction would impact upon any archaeological remains.

The Council's Conservation / Urban Design Officer has assessed the proposal and raises no objections to the bridge in terms of the impact upon the Grade II Listed Huntsmoor Weir and the Cowley Lock Conservation Area, subject to the structure of the bridge being painted in appropriate colours, which would be secured through an appropriate condition.

It is therefore considered that the proposed development is in accordance with Hillingdon Strategic Policy HE1, Policies DMHB 4 and DMHB 7 of the Hillingdon Local Plan: Development Management Policies (January 2020) and Policy 7.8 of the London Plan (March 2016).

#### **7.04 Airport safeguarding**

Not relevant to this application.

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

The proposed bridge is a modestly sized feature that would be largely finished in timber. The railings would allow views to permeate through the bridge and the structure would therefore not appear as a visually solid and / or intrusive feature. The bridge would not be located close to any other significant built forms and would therefore not result in unacceptable clutter or coalescence. Whilst it would stand alone, it would not appear as an alien feature within the countryside given the context, with a bridge not being an unexpected feature in a riverside environment.

No significant area of green space would be lost to accommodate the bridge and it has

been sited so as to require minimal works to existing woodland on the island. The bridge would not cause shading that could compromise the growth of vegetation and would not interrupt or alter the current flow of the River Colne.

The development does not include any external lighting that may compromise the rural nature of the surrounding area and the oak and green painted railing finish would result in a visually recessive appearance that would be compatible with the surrounding environment.

It is therefore considered that the proposed bridge would not result in any harmful impact upon the character and integrity of the green belt and is therefore in compliance with Policy EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policy DMEI 4 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and Policy 7.16 of the London Plan (March 2016).

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

The previous committee report advised:-

'The bridge is sympathetically designed and located and is of a modest size. It would be largely screened from view by surrounding vegetation and would only be visible from a small area immediately surrounding the site. In any case, the bridge is considered to be an appropriate feature within the surrounding riverside environment, which forms part of the Blue Ribbon Network and, as set out in sections 7.03 and 7.05 it would not compromise the setting or integrity of the surrounding historic environment or the green belt.'

There has been no change in site circumstances or any fundamental change in policy that would suggest the proposed bridge is no longer appropriate in terms of its impact on the character and appearance of the area.

It is therefore considered that the proposed development accords with Policies 7.4, 7.28 and 7.30 of the London Plan (March 2016) and Policies PT1.BE1 and PT1.EM3 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policy DMEI 8 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

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

The proposed footbridge would be positioned approximately 10 metres to the south of the southern boundary of Huntsmoor Weir. This boundary is marked by approximately 2 metre high timber fencing. The most elevated part of the bridge walkway would be at the centrepoint and would be raised approximately 0.35 metres above the height of the land adjacent to the boundary fence. As such, it is not considered that pedestrians using the bridge would be able to obtain intrusive views into Huntsmoor Weir as any views will be interrupted by the existing site boundary treatment.

The screening offered by the site boundary treatment combined with the low profile of the proposed footbridge would ensure that the footbridge does not appear overbearing towards Huntsmoor Weir nor will it cause any demonstrable overshadowing of the property.

The footbridge will allow access to Council owned green space which would be ancillary to the overall green space area around Little Britain Lake and it is not considered that it would lead to any unacceptable intensification in recreational use that would be to the detriment to the amenities enjoyed by the occupants of neighbouring dwellings.

It is therefore considered that the proposal is in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and Policy 7.6 of the London Plan (March 2016).



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

Not relevant to this application.

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

The previous report advised:-

'The footbridge would not be located on or adjacent to the highway. It would be accessible via the existing pathway that encircles Little Britain Lake. The slope angle of the footway is gentle and its width will allow adequate room for pedestrian movement. The footbridge would not be used by motorised vehicles.'

The proposal would not generate any additional traffic to the site than that which already occurs, so that there would be no requirement for additional car parking, in accordance with Policy DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

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

Urban design and access issues have been considered within the relevant sections of this report. As regards security, a condition is recommended that requires details of a locked gate and security details to be provided that will prevent the general public accessing the island over the footbridge.

It is therefore considered that the proposed development complies with Policy 7.3 of the London Plan (March 2016).

#### **7.12 Disabled access**

The proposed footbridge has step free access and the arch is not steeply inclined. The walkway would be 1.5 metres in width and this is adequate to allow for wheelchair access.

The Council's Access Officer has confirmed that the bridge is acceptable from an accessibility perspective.

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

Not relevant to this application.

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

The previous report to committee on the 2/8/17 advised:-

'The site is located within a Metropolitan and Borough Grade 1 Site of Importance for Nature Conservation (SINC). Policy EM7 of Hillingdon Local Plan: Part One - Strategic Policies (November 2012) provides objectives for the management of such sites and this includes the aim to work with partners, private landowners and other utility providers to achieve multi-functional use of land use that promotes and enhances biodiversity, adds to the green grid or achieves other open space outcomes, including improved accessibility.'

A Flood Risk Activity Permit will be required for the works and part of the application process involves the submission of a water vole survey on the riparian areas affected by the works along with protection and mitigation measures to be adopted should water voles be found to be present.

The western side of the footbridge would be landed on the bank of the island which is currently under dense tree cover. The precise positioning of the footbridge would be carefully considered so as to prevent the need to cut back trees and to ensure no harmful disturbance to root protection areas. The footbridge would not require any significant foundations to be dug and, as such, would not result in any harmful disturbance or

destabilisation to the banks of the river.

The proposed footbridge would not obstruct or alter the flow of the river nor adversely impact upon any significant habitat space on the banks of the river.'

Members deferred the application to allow for a further ecology impact report that considered all the wildlife on the island to be submitted.

An initial Preliminary Ecological Appraisal dated November 2017 has been submitted, followed by a Phase 2 Ecological Surveys & Assessment dated February 2019 and an Ecological Mitigation and Management Enhancement Plan, dated November 2019.

The Preliminary Ecological Appraisal comprised a desk study and an extended Phase 1 Habitat Survey. 5 types of habitat were found, namely broad-leaved semi-matural woodland; tall ruderal; river; amenity grassland and hard-standing. The appraisal reports on the flora and fauna found on or potentially supported by the site and provides a preliminary prediction of the impacts of the development and recommends mitigation and enhancement measures. It concludes by advising that although the proposals offer only minor changes to the site, due to its undisturbed nature, any change in recreational pressure may constitute a significant effect. It therefore recommends that multiple phase 2 ecological surveys and assessments are carried out to establish the current ecological baseline for the site and to guide any necessary mitigation / compensation. As the site is designated a SINCP and contains habitats of high ecological value, it further recommends that an Ecological Mitigation and Management Plan (EMMP) is produced, which would detail the ongoing management and monitoring of the site should the proposals be undertaken.

The Phase 2 Ecological Surveys & Assessment, based on the initial findings of the Preliminary Ecological Appraisal, undertook numerous surveys, namely a botanical walkover survey and surveys to establish the presence or not of the following species:-

- badger,
- bat roost scoping survey,
- breeding and wintering bird,
- fish and white-clawed crayfish,
- invertebrates,
- water vole and otter surveys.

The report notes that bat activity surveys, as recommended by the preliminary appraisal, were not considered necessary as the proposed works are minimal and there are no lighting constraints.

The botanical walkover survey found no rare or protected species, only flora typical of deciduous woodland. Three invasive species were recorded, Himalayan balsam, floating pennywort and snowberry. As regards badgers, despite suitable habitats being present, there was no evidence of badger setts or signs of commuting or foraging activity and therefore, the report concludes that this species is considered to be absent from the site. In terms of bats, a total of 25 trees were selected and inspected close to the site of the proposed bridge as these had the greatest potential to be impacted upon and 12 of these had a moderate to high potential of providing a bat roost(s). As regards the breeding bird survey, 31 species were recorded throughout the breeding season and a total of 24 species were likely to be breeding on the site, including 2 red-listed species (Song and

Mistle Thrush) and 5 amber-listed species (Dunnock, Mallard, Stock Dove, Swift and Kingfisher) with 2 Schedule 1 species (Kingfisher and Red Kite). The wintering bird survey recorded 50 bird species of which 15 are considered notable species, 7 on the BoCC red-list (Fieldfare, Grey Wagtail, Mistle Thrush, Redwing, Skylark, Song Thrush and Starling) and 8 on the BoCC amber-list (Black-Headed Gull, Common Gull, Dunnock, Gadwell, Kingfisher, Mallard, Mute Swan and Stock Dove). However, the report notes that none of the species recorded are considered uncommon or rare at any geographical scale; their red-listed and NERC species status are due to widespread declines across the UK range and that they are still widespread in the region. As regards the fish and white-clawed crayfish survey, this noted that the weir has a side baffle fish pass although identified the left-hand bank along the eastern arm of the River Colne as having poor habitat variety although the channel below the weir did provide potential habitat for coarse fish, whereas the western arm had a mix of flow types and potential habitats for a variety of fish species, including bullhead, a species listed under Annex 11 of the EC Habitats Directive. Non-native Signal crayfish were observed so that the presence of white-clawed crayfish is unlikely. In terms of the invertebrate survey, no invertebrate species of conservation concern were recorded and in terms of water voles and otters, there was no active evidence of them utilising the site.

The report also notes that there is evidence of flytipping and human activity scattered throughout the island.

The Ecological Mitigation and Management Enhancement Plan, dated November 2019 describes the potential impacts and the mitigation and enhancement works that are required to safeguard biodiversity on the site. The plan acknowledges that the proposed works are of low impact and of a small scale with habitat loss having been designed out to a minimum, but there is still a need to follow industry pollution prevention standards during construction, protect root protection areas of adjoining trees, prevent lighting within or immediately adjacent to the site unless required for health and safety reasons when specific conservation mitigation guidance for bats is to be followed, removal of invasive species, natural banks to be retained and protected, removal of dead wood kept to minimum, any footpaths only allowed on southern part of site and these to be constructed of bark/woodchip and to follow existing natural pathways. The plan recommends that a Construction and Environmental Management Plan (CEMP) is submitted to detail the mitigation measures during the construction phase. The CEMP could be secured by condition, which has been included as part of the officer recommendation.

The main threat to the biodiversity on the island is during the operational phase as a result of the potential disturbance to wildlife. The plan advises of the need to create a 'no-access' area on the island to the north of the weir with the planting of a hedgerow with native thorny species / scrub across the entire width of the island to act as a physical boundary. Only the southern part of the island would be accessible and the report recommends that signage should be installed advising users of ecological importance of the site, any recreational use is restricted to walkers and anglers, no dogs to be permitted on the island, regular litter picks, access restricted to daytime only, with no lighting to maintain dark corridors; site to be monitored for recreational impacts with subsequent plans for mitigation / compensation as necessary, including possible re-closure of the island if necessary. The plan then goes on to advise of the mitigation / enhancement works required for the habitats and individual species, including planting of fruit and seed bearing trees to encourage badgers; installing bird and bat boxes, including kingfisher tunnels, planting schedule of redds, grasses, rushes, sedges etc to encourage water voles.

Both Natural England and the Hillingdon Group of the London Wildlife Trust do not raise any objections to the proposal, although the LWT do wish to stress the importance of ensuring that the proposed 'undisturbed' area is kept as such for the benefit of wildlife, especially birds as it could easily be abused if not monitored and corrective action taken when necessary. The Hertfordshire and Middlesex Wildlife Trust do raise an identical point, commenting that the mitigation works etc. look reasonable on paper but the likely reality will be that it will not be enforced and people will ignore the signage and as this is too great a risk to take for such limited public benefit, raise an objection to the proposal on this ground. The Colne Valley Park also have the responsibility of preserving the biodiversity of the park within their remit and advise on this application that the impact on biodiversity, although minor, is addressed through the proposed mitigation and therefore the EMMP should be enforced through a legal obligation.

The EA in their letter dated 16/8/17 have explained the need for the footbridge in order to improve access to the weir for maintenance purposes to order to help manage flood risk (Section 6.0). Although the difficulties of the current access arrangements involving crossing private land are disputed by the landowner, it would be expedient to avoid any potential conflict and provide access to the weir without the need to cross private land.

There is a concern that the bridge would provide unfettered access to the island and the plans submitted do not provide details of any paths. Comments received on this application from the public do suggest that Little Britain Lake does experience instances of anti-social behaviour and perpetrators of such activity would be less inclined to respect the 'no-access' restriction on the island and wildlife interests generally. The potential threat posed by letting the general public have access to the island, even if it is on the smaller, less ecologically sensitive southern part, is significant and it is therefore considered that access across the footbridge should be controlled by the Council's Green Spaces Team and only to those involved with the purposes of ecology and water management/maintenance (including access by persons employed by the Environment Agency or their sub contractors). A condition restricting access to the general public therefore forms part of the officer's recommendation. A condition has also been added requiring a Management Plan to be submitted which will detail the access, management and maintenance arrangements on the island.

The Council's Tree Officer advises that the EMMP, dated November 2019, confirms that habitats will be retained and the work will comprise small-scale low impact work, with vegetation clearance limited to saplings and small areas of brush. Specifically regarding trees, the officer advises that no topographic or arboricultural impact assessment has been carried out to confirm that it is feasible to land the bridge on the island without affecting trees, although submitted drawings indicate that the intention is to land the bridge on foundation pads between the nearest trees. The officer concludes that subject to good construction management and methodology it should be possible to construct the pads without damaging the trees. The pre-fabricated bridge will then be craned into position, an operation which will also require careful control to prevent damage to the bridge or nearby trees and recommends a number of tree protection conditions. These conditions are included as part of the officer's recommendation.

On this basis, it is therefore considered that the proposed footbridge is in accordance with Policies 7.19 and 7.21 of the London Plan (March 2016), Policy EM7 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies DMHB 14 and DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

#### **7.15 Sustainable waste management**

Not relevant to this application.

#### **7.16 Renewable energy / Sustainability**

Not relevant to this application.

#### **7.17 Flooding or Drainage Issues**

The previous report to committee on the 2/8/17 advised:-

'The footbridge would span the banks of the cut of the Colne River, within Flood Zone 3 and the functional flood plain (Flood Zone 3b). The footbridge has been positioned at a suitable level so as to prevent obstruction to the flow of the river or jamming with debris so as to safeguard against the potential for presenting a flood risk.

Table 2 of the Flood Risk and Coastal Change guidance which supplements the NPPF classifies amenity open space as a water compatible use whilst Table 3 of the same guidance recognises water compatible use as appropriate for Flood Zone 3b provided that any structure is designed and constructed to:-

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage; and
- not impede water flows and not increase flood risk elsewhere.

The Environment Agency have assessed the proposals and have raised no objections. The key issue relates to the height of the bridge soffit which must be sufficient to be resilient to flooding.

The proposed bridge soffit height has been deemed acceptable by the Environment Agency and the height of 27.72 metres AOD and a condition will be used to ensure the footbridge is built in accordance with these details.

The bridge would be raised above the river and therefore not impede water flow whilst the fact that the bulk of it is over the river will prevent any net loss in floodplain storage.'

The Environment Agency has been re-consulted on the application and advise that they are supportive of the submitted Preliminary Ecological Appraisal and recommend informatives regarding the need for a Environmental permit and use of herbicides. These are included within the officer's recommendation.

The Council's Water and Flood Management Officer has been re-consulted on the application following the receipt of the ecological information and advises that it is the Environment Agency who lead on the response on applications on a main river and within the floodplain and then goes on to advise that they raise no objections in principle to the proposed bridge for access purposes subject to the detail of the design and flood risk mitigation proposed such as raising the soffit of any bridge above the 1 in 1000 year flood levels to limit impact on the river corridor.

A condition has been added to this effect.

It is therefore considered that the proposed footbridge, provided it is built in accordance with approved details, will accord with Policy 5.12 of the London Plan (March 2016), Policy EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policy DME1 8 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

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

The bridge would not result in any material increase in the generation of noise. As mentioned earlier in the report, it would not be used by motorised vehicles.

It is therefore considered that the proposed footbridge satisfies Policy 7.15 of the London Plan (March 2016) and Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012).

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

As regards the petitioner's objection, this has been addressed in the officer's report.

In terms of the individual responses, as regards point (i) concerning the existing right of access to the weir, in their letter dated 16/8/17, the EA highlights the difficulties they have been experiencing exercising this right of access and hence the need for an alternative access via the proposed bridge, as regards (ii), it appears that the island has no official name according to Ordnance Survey maps. As regards points (iii) and (iv) regarding consultation, there are no other adjacent properties and a site notice was displayed adjacent to the site and a notice advertised in the paper. Points (v), (vi), (vii), (lv) and (lix) are noted. Points (viii) and (ix) - (xvi), (xviii) - (xxx), (xxxii) - (liv) and (lvi) concerning anti-social behaviour, ecology, flood risk, character of the area and car parking are dealt with in the officer's report. Point (xvii) regarding cost / benefit analysis does not raise a relevant planning matter. In terms of Point (xxxi), this is noted, but no evidence has been provided to suggest that the ecological surveys are misleading. As regards point (lvii) concerning a similar bridge to an uninhabited island within the Fray's River, permission for the bridge was granted at appeal.

The 2 comments in support (lx) and (lxi) are noted.

#### **7.20 Planning obligations**

No Section 106 agreement or CIL payment is required for this application.

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

#### **General**

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

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

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

#### **Planning Conditions**

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

### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

### Equalities and Human Rights

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

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

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

## **10. CONCLUSION**

This application has attracted a significant amount of public opposition, with the main concern expressed being a perceived threat to the ecology of the island. However, with proposed works being kept to a minimum, the mitigation and enhancement works of the EMMP and access to the island being restricted to those involved with its ecology and water management/maintenance of the weir, this scheme will not harm the biodiversity of the site and if managed correctly, there is a very strong likelihood that it will be enhanced.

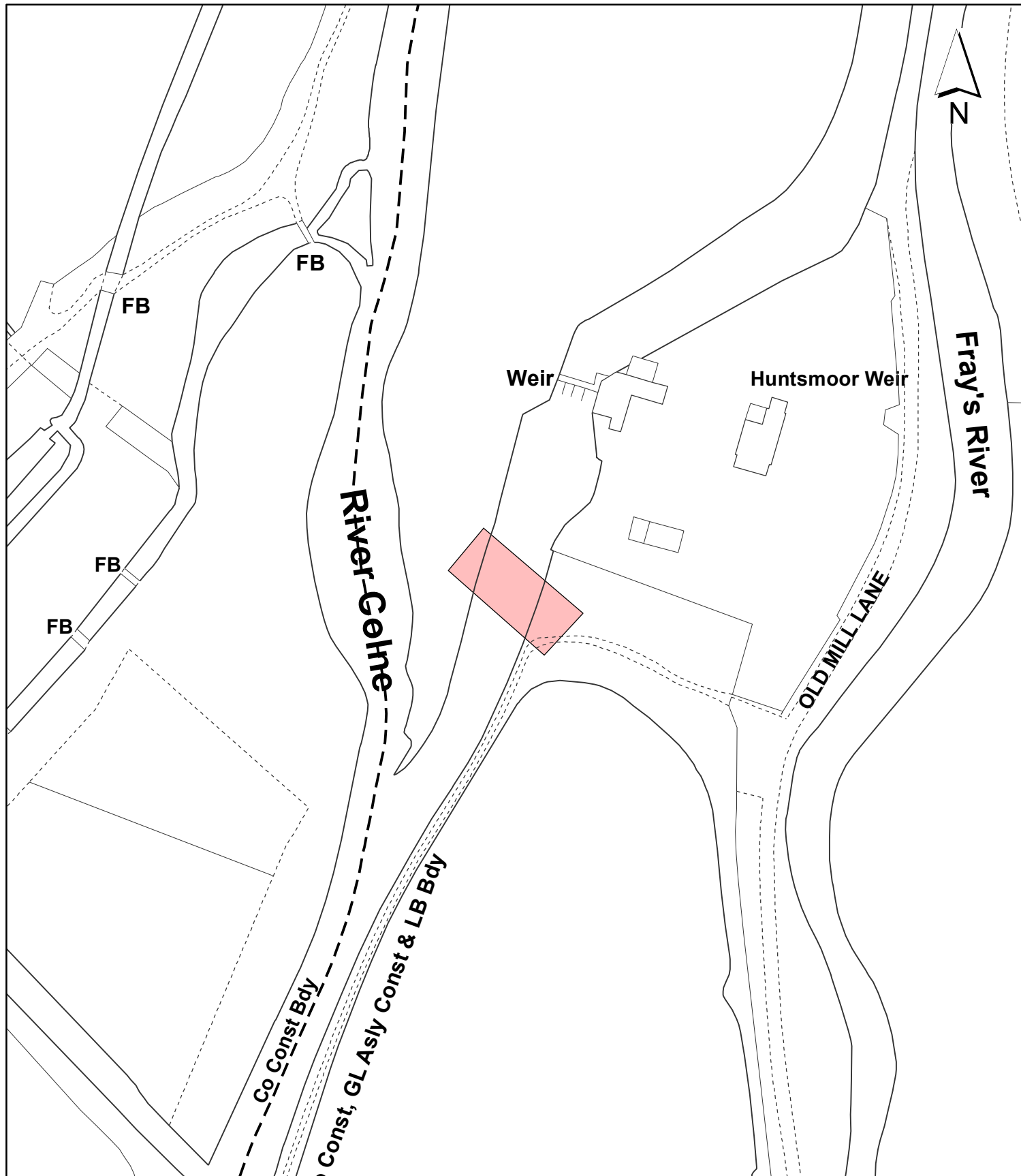
For the reasons discussed in this report, the application is recommended for approval, subject to relevant conditions.

## **11. Reference Documents**

National Planning Policy Framework (February 2019)  
London Plan (March 2016)  
Emerging London Plan  
Hillingdon Local Plan: Part One: Strategic Policies (November 2012)  
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)

**Contact Officer:** Richard Phillips

**Telephone No:** 01895 250230



# Notes:

 Site boundary

For identification purposes only.

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Site Address:

**Little Britain Lake  
Packet Boat Lane**

Planning Application Ref:

**52368/APP/2017/1844**

Planning Committee:

**Major** Page 40

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON



## Report of the Head of Planning, Transportation and Regeneration

<b>Address</b>	FORMER MASTER BREWER SITE FREEZELAND WAY HILLINGDON
<b>Development:</b>	Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.
<b>LBH Ref Nos:</b>	4266/APP/2019/3088
<b>Drawing Nos:</b>	P0-400 P1 P1(03)-100_P3 BMD.19.020.DR.P303 B BMD.19.020.DR.P301 B BMD.19.020.DR.P101 A Air Quality Assessment MR_JEB_P19-1773_01 Rev A) P0-100_RevP3 P0-701 (P1) P0-702 (P1) P0-703 (P1) P0-700 (P1) P0-704 (P1) P0-705 (P1) P0-706 (P1) P0-707 (P1) P0-708 (P1) P0-709 (P1) P0-710 (P1) Flood Risk Assessment Transport Assessment Acoustic Assessment Rev 8 Geo environmental (ground contamination) Reptile Survey WSP proposed Highways improvements TA Addendum (Dec 19) TVIA Addendum (Dec 19) P3(02-03)-100_Rev P3 P3(04)-100_Rev P3 P3(05)-100_Rev P3 P3(01)-100_Rev P3 P3(06)-100_Rev P3 P3(07)-100_Rev P3 P3(08)-100_Rev P3 P3(09)-100_Rev P3 P3(10)-100_Rev P3 P3(11)-100_Rev P3 P3(12)-100_Rev P3 P1(04)-100_P3

Topographical Survey  
 Daylight and Sunlight Assessment  
 Design and Access Statement  
 Planning Statement  
 E0-100\_P3 - Existing Site Plan  
 E0-001\_P3 - Proposed Site Plan  
 Statement of Community Involvement (SCI)  
 Surface Water Management Report  
 Sustainability Statement (5550-01-10-19)  
 Energy Statement (01-10-19)  
 Outline Fire Strategy Rev A  
 Ecology Assessment  
 Bird Hazard Management Plan  
 Town and Visual Impact Assessment (BMD.19.020.RP.001)  
 Archaeology Report  
 Ventilation Strategy  
 BMD.19.020.DR.P302A  
 BMD.19.020.DR.P304A  
 BMD.19.020.DR.P305 A  
 BMD.19.020.DR.P306A  
 BMD.19.020.DR.P307A  
 BMD.19.020.DR.P308A  
 BMD.19.020.DR.P309A  
 BMD.19.020.DR.P401A  
 BMD.19.020.DR.P001A  
 BMD.19.020.DR.P100A  
 BMD.19.020.DR.P102A  
 BMD.19.020.DR.P103A  
 BMD.19.020.DR.P104A  
 BMD.19.020.DR.P105A  
 BMD.19.020.DR.P106A  
 BMD.19.020.DR.P107A  
 BMD.19.020.DR.P108 Rev 3  
 BMD.19.020.DR.P109A  
 Tree Constraints Plan  
 Arboricultural Assessment (BMD.19.020.RP.903 REV A)  
 Bird Hazard Management Plan  
 P1(05)-100\_RevP3  
 P1(06)-100\_RevP3  
 P1(07)-100\_RevP3  
 P1(08)-100\_RevP3  
 P1(09)-100\_RevP3  
 P1(10)-100\_RevP3  
 P1(11)-100\_RevP3  
 P1(12)-100\_RevP3  
 P4-109 (P1)  
 P4-115 (P2)  
 P4-152 (P1)  
 P0-100 (P3)  
 BB-DRC-3671-02

70057679-TP-SK-18-A  
 BMD.19.020.DR.SK003  
 Travel Plan  
 P0-401 P1  
 P0-402 P1  
 P0-403 P1  
 P0-404 P1  
 P0-405 P1  
 P0-406 P1  
 P0-407 P1  
 P0-408 P1  
 P0-409 P1  
 P0-410 P1  
 P0-001\_Rev P3  
 P0-101\_Rev P3  
 P0-102\_Rev P3  
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 P0-111\_Rev P3  
 P0-200\_Rev P3  
 P0-201\_Rev P3  
 P0-300\_Rev P3  
 P0-301\_RevP3  
 P0-302\_RevP3  
 P0-303\_Rev P3  
 P1(02)-100\_P3  
 P1(01)-100\_P3

<b>Date Plans Received:</b>	23/09/2019	<b>Date(s) of Amendment(s):</b>	27/01/2020
<b>Date Application Valid:</b>	10/10/2019		18/11/2019
			31/10/2019
			16/12/2019
			23/09/2019
			23/12/2019
			11/10/2019
			09/12/2019
			09/10/2019

## 1. SUMMARY

Detailed planning permission is sought for redevelopment of the former Master Brewer site, for a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 residential units; flexible commercial units (Use Class

B1/A1/A3/D1); 165 car parking spaces and landscaping.

1943 local residents and businesses were consulted. 268 representations have been received including two in support and 266 objections.

The Residents Association and Oak Farm Residents Association have also made representations, objecting to the proposed development.

The application is referable to the Mayor as it falls into the following categories of the Schedule to the Order 2008:

- Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats;
- Development which comprises or includes the erection of a building or buildings outside Central London with a total floorspace of more than 15,000 square metres; and
- Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London

Whilst no objection is raised to the principle of redevelopment of the site with a residential led mixed use scheme, it is considered that the size and scale of the proposed development is not in keeping with the local character and context. The resultant development would be excessive in height, massing and density which would be detrimental to the visual appearance of the wider area and would have a negative visual impact in both short and long distant views. In addition, the height and bulk of the proposed development will appear excessively prominent, to the detriment of the open character of the adjoining Green Belt whilst also having a negative impact on the surrounding streetscape.

The application also fails to demonstrate that the proposal would not result in an unacceptable rise in traffic in and around the application site, causing severe impacts to the free flow of traffic as well as to highway and pedestrian safety.

Furthermore, on-site parking provision for the residential element is considered inadequate and insufficient to address the demands of the proposed development in this locality, given the site's relatively low public transport accessibility.

Whilst the proposed development would generally provide acceptable living conditions in terms of space standards for all of the proposed units and protect the residential amenity of surrounding occupiers, objections still remain regarding daylight and sunlight levels for the proposed occupants, noise levels within the development and air quality. Furthermore, insufficient private amenity space has been provided.

Based on the information submitted to date, there are a number of issues which are also considered unsatisfactory. However it is considered that subject to appropriately worded conditions (or legal agreement) these issues could be resolved. These issues include; Accessibility within the site; Flood Risk and Surface Water Drainage; Landscaping; and Ecology.

There are a number of items which need to be secured by way of a legal agreement which are listed in detail within the Planning Obligations section of this report. Although agreement to some of the obligations has been indicated by the Applicant neither a S106 Agreement or Unilateral Undertaking has been signed. The development therefore fails to satisfactorily address some issues relating to contributions towards the improvements required as a consequence of the proposed development. This is in respect of off-site highways works, public transport, travel plans, employment and training, parking permits

and car club, landscape screening and ecological mitigation, affordable housing, surface water drainage, off-site carbon contribution and project management and monitoring.

For the reasons set out above, the application is being recommended for refusal.

## **2. RECOMMENDATION**

**1. That the application be referred back to the Greater London Authority.**

**2. That should the Mayor not issue a direction under Article 7 of the Order that he is to act as the Local Planning Authority for the purposes of determining the application, delegated powers be given to the Head of Planning, Transportation and Regeneration to refuse planning permission for the following reasons:**

### **1 NON2 Non Standard reason for refusal Design**

The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt, the wider open context and would mar the skyline, contrary to Policies BE1 and EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMHB 10, DMHB 11, DMHB 12, DMHB 14, DMHB 17, DME1 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part Two - Site Allocations and Designations (2020), Policies 7.4, 7.6, 7.7 of the London Plan (2016), Policies D1, D3, D4, D8 and D9 of the London Plan (Intend to Publish version 2019) and the NPPF (2019).

### **2 NON2 Non Standard reason for refusal Parking**

The proposed on site residential and commercial car parking provision is insufficient to address the demands of the proposed development and its future occupiers. Due to the sites low public transport accessibility, the proposed development would lead to future resident and visitor vehicles being displaced onto the surrounding local and strategic road network. This displacement of vehicles would lead to further congestion on the local and strategic highway network resulting in severe harm to the highway network and highway and pedestrian safety. The proposals are contrary to Policy T1 and E5 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policies 6.3, 6.11 and 6.12 of the London Plan (July 2016), Policies T4, T6 and T6.1 of the draft London Plan (Intend to publish version 2019) and the NPPF (2019).

### **3 NON2 Non Standard reason for refusal Traffic**

The application fails to demonstrate that the proposal would not result in an unacceptable rise in traffic around the application site causing severe impacts to the free flow of traffic as well as to highway and pedestrian safety. The proposals are contrary to Policy T1 and E5 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policies 6.3, 6.11 and 6.12 of the London Plan (July 2016), Policies T4, T6 and T6.1 of the draft London Plan (Intend to publish version 2019) and the NPPF (2019).

### **4 NON2 Non Standard reason for refusal Noise**

The submitted noise report has failed to demonstrate that the proposed residential units can be sited, designed, insulated or otherwise protected from external noise sources and

in particular the A40 and Long lane to appropriate national and local standards. The proposal is therefore contrary to Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) Chapters 12 and 15 of the NPPF (2019), Policy DMHB 11 of the Local Plan Part 2- Development Management Policies (2020), Policy 7.15 of the London Plan (2016) and Policy D14 of the London Plan (Intend to Publish version 2019).

**5 NON2 Non Standard reason for Air Quality**

The submitted Air Quality Assessments have failed to provide sufficient information regarding Air Quality, moreover the information submitted is not deemed to demonstrate the proposals are air quality neutral and given that the site is within an Air Quality Focus Area, the development could add to current exceedances in this focus area. The development is contrary to Policy DMEI 14 (Air quality) of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM8 of the Local Plan Part 1 (2012), Policy 7.14 (Improving Air Quality) of the London Plan (2016), Policy SI 1 of the draft London Plan - Intend to Publish (December 2019) and the NPPF (February 2019).

**6 NON2 Non Standard reason for Daylight and Sunlight**

The submitted Sunlight and Daylight Assessment has failed to adequately assess the expected Daylight and Sunlight levels within the development in accordance with BRE guidance. The proposed development has therefore failed to demonstrate that the proposed residential units would achieve adequate Daylight and Sunlight levels to the detriment of residential amenity of future occupiers contrary to policies DMHB 10 and DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy BE1 of the Local Plan Part 1 (2012), The GLA 'Housing' SPG (March 2016), Policy D6 of the London Plan (Intend to Publish version 2019) and the NPPF 2019.

**7 NON2 Non Standard reason for refusal Private Amenity Space**

The proposed development fails to provide on site private and communal amenity of a quantity and quality commensurate to the size and layout of the proposals. The shortfalls of private amenity space are detrimental to the residential amenity of the future occupiers the proposal would provide a substandard form of accommodation for future residents contrary to Policies DMHB 11 and DMHB 18 of the Local Plan Part 2- Development Management Policies (2020), Policy BE1 of the Local Plan Part 1 (2012), Policy 7.1 of the London Plan (2016), Policies G1 and D6 of the Draft London Plan (Intend to Publish version 2019) and Para 127 of the NPPF (2019).

**8 NON2 Non Standard reason for refusal Planning Obligations**

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 Affordable housing, construction training, landscape and ecological announcements, carbon offset contributions, surface water drainage, parking permit exclusion, car clubs and Project Management and Monitoring). The scheme therefore conflicts with Policies Policy R17 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), DMCI 7 of the Hillingdon Local Plan Part 2 Development management Policies (2020), the London Borough of Hillingdon Supplementary Planning Document on Planning Obligations, Policy SA 14 'Master Brewer and Hillingdon Circus' of the Local Plan: Part Two Site Allocations and Designations (2020), Policy DF1 of the Draft London Plan (Intend to Publish Version 2019), Policy 8.2 of the London Plan (2016) and the NPPF 2019.

**INFORMATIVES**

**1 I52 Compulsory Informative (1)**

The decision to REFUSE 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 REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Hillingdon Local Plan: Part 2 - Development Management Policies (2020); Hillingdon Local Plan: Part Two - Site Allocations and Designations (2020), The London Plan (2016) and Supplementary Planning Guidance, and all relevant material considerations, including the NPPF.

NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
DMEI 14	Air Quality
DMEI 7	Biodiversity Protection and Enhancement
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
DMAV 1	Safe Operation of Airports
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DME 1	Employment Uses in Designated Sites
DME 3	Office Development
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 9	Management of Flood Risk
DMH 7	
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 13	Shopfronts
DMHB 13A	Advertisements and Shop Signage
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
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 3.10	(2016) Definition of affordable housing
LPP 5.16	(2016) Waste net self-sufficiency
LPP 7.16	(2016) Green Belt
LPP 7.2	(2016) An inclusive environment
DMH 2	Housing Mix
DMHB 1	Heritage Assets
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMTC 3	Maintaining the Viability of Local Centres and Local Parades
LPP 7.8	(2016) Heritage assets and archaeology
SA 14	Master Brewer and Hillingdon Circus, Hillingdon
LPP 2.15	(2016) Town Centres
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.11	(2016) Affordable housing targets
LPP 3.12	(2016) Negotiating affordable housing on individual private residential and mixed-use schemes
LPP 3.13	(2016) Affordable housing thresholds
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.6	(2016) Children and young people's play and informal recreation facilities
LPP 3.7	(2016) Large residential developments
LPP 3.8	(2016) Housing Choice
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.12	(2016) Improving opportunities for all
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.7	(2016) Renewable energy
LPP 6.10	(2016) Walking
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.13	(2016) Parking
LPP 6.2	(2016) Providing public transport capacity and safeguarding land for transport
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.4	(2016) Enhancing London's Transport Connectivity
LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality



LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy

### 3

You are advised that had the Local Planning Authority not refused permission for the above reasons, and had the development been considered acceptable in other regards, it would have required that the applicant enter into a legal agreement to secure planning obligations relating to highways works, a travel plan, construction training, air quality, carbon off-set contribution, affordable housing, ecological mitigation, flood risk and surface water run off and project monitoring & management as set out within the Officers Report and Addendum to the Major Applications Planning Committee on the 19th February 2019.

### 4

The Local Planning Authority has taken into consideration the requirements of the National Planning Policy Framework and has worked pro-actively with the applicant through extensive negotiations to address material planning issues wherever possible. We have made available detailed advice in the form of our statutory policies from the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Hillingdon Local Plan: Part 2 - Development Management Policies (2020); Hillingdon Local Plan: Part Two - Site Allocations and Designations (2020), The London Plan (2016) and Supplementary Planning Guidance, and all relevant material considerations, including the NPPF and other informal written guidance, as well as offering a full pre-application advice service. Notwithstanding these discussions, the scheme was ultimately considered to fail to comply with the development plan for the reasons identified above.

### 5 174 **Community Infrastructure Levy (CIL) (Refusing Consent)**

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012.

For more information on CIL matters please visit the planning portal page at: [www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil](http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil)

## 3. **CONSIDERATIONS**

### 3.1 **Site and Locality**

The application site measures approximately 2.48 Ha and is located at the junction of Long Lane and Freezeland Way within the North Hillingdon Local Centre. The site was formerly occupied by the Master Brewer Motel, a public house/motel with 106 bedrooms, conferencing and restaurant facilities and 200 parking spaces. Following demolition of the Motel and associated buildings, the site is currently a cleared site.

The site has been recently been unlawfully used as Royal Mail depot between November 2019 and January 2020. The occupiers have been in dialogue with the Councils Enforcement team and the use as a Royal Mail depot has now ceased.

The site comprises mostly hard standing with semi-mature and mature trees and vegetation around the boundary. Vehicular access to the site is provided via an entrance/exit point onto Freezeland Way.

The site is broadly flat but inclines at its boundary adjacent to Long Lane with an approximate change in levels of 2.5m and declines towards the north at the junction with the M40 with an approximate change in levels of 3m.

Immediately to the west of the site is Long Lane/A437, beyond which is a vacant site which lies adjacent to Hillingdon Station and benefits from planning permission for a 5 storey office development measuring 11,574 sq.m and 289 car parking spaces. This permission has been partially implemented by the construction of a roundabout and associated access.

There is a strip of land between the site and Long Lane and also a parcel of land to the south which fall outside of the red line plan and which is currently owned by a third party (thought to be TfL).

To the southeast of the site is a parcel of Council owned land fronting Freezeland Way which is not included within the planning application site area. On the southern side of Freezeland Way are predominately two storey residential properties.

The site falls within the North Hillingdon Local Centre and the land to the east and north of the site falls within the Green Belt. There is a parcel of land which lies directly adjacent to the red line plan to the east which has been purchased by the Applicant. No works are proposed here as part of this application.

The site is approximately 200 metres east of Hillingdon London Underground Station. The station is adjacent to TfL bus routes and coach stops which provide services to Uxbridge, Oxford and Ickenham. The site has a Public Transport Accessibility Level (PTAL) of 2 and 3 where 6 is high.

Hillingdon Circus is characterised by two/three storey buildings with commercial uses on the ground floor and residential uses above. Further to the south along Long Lane and also to the north towards Ickenham there are mostly two storey semi-detached and detached houses. Hercies Road to the west has one four storey building and is then predominately two storey houses and bungalows. Aerial Drive to the south of Hercies Road is characterised by three storey flats, parking and garages.

To the east of the site is Freezeland covert which is a triangular piece of land bound to the north by the M40 and south by the exit Road from the M40. This is open land and is designated Green Belt. The Green Belt extends westwards on the other side of Long Lane/Hercies Road. To the north and northeast is also designated Green Belt and the Hillingdon Trail. Northolt Airport is located further to the north east.

### **3.2 Proposed Scheme**

A full planning application has been submitted for the construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514

units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.

## Commercial

Flexible commercial space is proposed at ground floor level in the south west corner of the site where a small square is proposed. The commercial accommodation would include approximately 1,200 sqm of B1/A1/A3/D1 uses.

## Residential

Residential accommodation is provided in the form of apartments and duplexes, incorporating a mix of market and affordable accommodation of varying sizes. The residential unit mix is provided below:

All of the residential units would be built to (Building Regulations) Wheelchair Adaptable standards and 10% of the units would be built to Wheelchair User standards.

### Housing Mix (514 new homes)

221 (43%) 1 Bedroom Units  
216 (42%) 2 Bedroom Units  
77 (15%) 3 Bedroom Units

The proposed buildings vary in height up to 11 storeys. The tallest building is located in the north western corner of the site adjacent to Long Lane and the A40. One solid building measuring approx. 150 m would run along the northern boundary and would accommodate car parking at ground level with residential accommodation above interspersed by podium level amenity space at the first floor. This block would have the appearance of five separate residential blocks (Buildings 5, 6, 7, 8 & 9) separated by single storey units and would incorporate five main entrances to the residential dwellings above. Seven residential units are proposed at ground floor level, four of which are single aspect.

There are a further two blocks located along the western boundary adjacent to Long Lane. One (Building 1) is located to the south western corner of the site where a small square is proposed and the other (Buildings 2, 3 & 4) would have the appearance of three blocks separated by two storey houses with pitch roofs. This block would accommodate car parking at ground floor level with amenity space is provided at first floor podium level. Four north facing single aspect residential units are also proposed at ground floor level.

A further three blocks would be located on the eastern part of the site. No podium is proposed here and residential accommodation is located at ground floor level.

The buildings proposed along the northern and western boundary, are positioned to provide a perimeter block arrangement. The Applicant explains that these perimeter buildings are proposed as continuous built volumes, to protect the site from road noise and air pollution from Long Lane and the A40.

Building 1 would be eight storeys and is located at the south western corner of the site. It would have 368 sqm of flexible commercial space on the ground floor (B1/A1/A3/D1) and

would have 61 dwellings in the upper storeys. Also on the ground floor is cycle storage and commercial bin storage. The commercial units on the ground floor front Long Lane, Freezeland Way and the new central square. The proposed materials for building 1 are brick with accented metal framing and reconstituted stone.

Buildings 2, 3 & 4 are housed in one single block on the western portion of the site and would have two commercial units (B1/A1/A3/D1) on the ground and first floor of approx. 275 sqm and 488 sqm respectively. Building 2 would be eight storeys and would accommodate 37 dwellings, building 3 would be eight storeys and would accommodate 35 dwellings and building 4 would be up to seven storeys and would accommodate 46 dwellings some of which would be duplex. The proposed materials for buildings 2, 3, & 4 is brick with accented reconstituted stone and metal framing.

Buildings 5, 6, 7, 8 & 9 are housed in one single block on the northern part of the site. Building 5 is 11 storeys and would accommodate 64 dwellings. The proposed materials for building 5 and the attached four storey duplex housing would be buff brick with reconstituted stone and metal cladding and framing. Buildings 6, 7, & 8 are each up to eight storeys with the upper two floors stepped in at the south by approx. 7m. Buildings 6 and 7 each accommodate 45 dwellings whilst Building 8 accommodates 46 dwellings. The duplex housing would be buff brick with metal framed windows. The three blocks would be brick with the upper two storeys clad in metal. Building 9 would be three storeys and would accommodate 15 dwellings.

Building 10 would be seven storeys and would accommodate 50 units. The material would comprise red brick with upper storey being clad in metal.

Buildings 11 and 12 would be five storeys and would provide 70 units.

In summary (Total 514 units):

- Building 1 - 61 units
- Building 2 - 37 units
- Building 3 - 35 units
- Building 4 - 46 units
- Building 5 - 64 units
- Building 6 - 45 units
- Building 7 - 45 units
- Building 8 - 46 units
- Building 9 - 15 units
- Building 10 - 50 units
- Building 11 - 35 units
- Building 12 - 35 units

#### Amenity Space

Private amenity space is provided throughout the development in the form of private balconies and terraces and private podium level gardens. In addition, the proposals include public open space which is accessible to everyone, not just the future residents of this development.

#### Parking

A total of 165 car parking spaces are proposed at ground floor level within the podium or at surface street level. 16 of the spaces would be Blue Badge/ Wheelchair accessible

spaces. Four car club spaces are proposed with an offer of three years free membership to be provided for each dwelling upon first occupation. 20% of the parking spaces (34 spaces) would include active electric vehicle charging points and the remaining spaces (131 spaces) would have passive electrical charging capability. Space to store approximately 918 bicycles has also been provided.

The proposal would also include an electricity sub station which would be located close to the western boundary fronting Long Lane.

The application is supported by a number of supporting documents which are listed below:

Design and Access Statement and Masterplanning Principles (JTP)  
Detailed Application Drawings (Collado Collins)  
Transport Assessment (WSP)  
Travel Plan (WSP)  
Statement of Community Engagement (Terrapin)  
Air Quality Assessment (Create Consulting)  
Acoustic Assessment (Spectrum)  
Flood Risk Assessment and Surface Water Strategy (ICIS Design Limited)  
Land Contamination Assessment (Delta Simons)  
Tree Survey and Arboricultural Implications (Bradley Murphy Design)  
Energy and Sustainability Statement (Cudd Bentley)  
Daylight/Sunlight Assessment (Robinson Consulting)  
Landscaping Masterplan and Drawings (Bradley Murphy Design)  
Ecology Phase 1 Habitat Report (Bradley Murphy Design)  
Townscape Visual Impact Assessment (Bradley Murphy Design)  
Bird Strike Mitigation (Bradley Murphy Design)  
M+E Concept Design (Cudd Bentley)  
Ventilation Statement (Cudd Bentley)  
Archaeology Statement (AOC)  
Topographical Survey  
Fire Strategy

### **3.3 Relevant Planning History**

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

Most recently application ref. 4266/APP/2017/3183 for 'construction of a residential-led, mixed use development comprising buildings between 4 and 9 storeys to provide 437 residential units (Use Class C3); employment floor space (Use Classes B1(a-c)); flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking; and hard and soft landscaping, plant and other associated ancillary development.' was refused on 21/03/19 for a total of ten reasons which are summarised as follows;

- Height, density, site coverage and lack of landscaping and screening
- Insufficient on-site car parking
- Unacceptable increase in traffic in the locality
- Inaccessible to wheelchair users, particularly the community amenity space areas
- Inadequate SuDS
- Climate change and carbon emissions
- Loss of high value trees
- Unacceptable impact of noise on the proposed residential dwellings
- Inadequate refuse and recycling facilities
- Insufficient planning contributions

Previous to this Hillingdon Council resolved to grant full and outline consents on 27 August

2014 (Full application ref.4266/APP/2014/518) for 'retail-led, mixed-use redevelopment of the site, comprising a 3,543 sq.m. (GIA)/2,182 sq.m.(net) foodstore, with 179 car and 32 cycle parking spaces (class A1); three additional retail units totalling 1,037sq.m. (Use Classes A1 to A5); a 100 sq.m. 'Safer Neighbourhoods' unit; a 70-bedroom hotel comprising six storeys plus plant level, 18 car parking and 16 cycle spaces; with associated highway alterations and landscaping' and (Outline application ref:4266/APP/2014/519) for '125 residential units, with 100 car parking spaces, 138 cycle parking spaces, associated highway alterations and landscape improvements'. However the Section 106 agreement was never completed by the applicant in connection with these applications and so planning permission was never granted.

A full application (ref: 4266/APP/2012/1544) for 'Mixed use redevelopment comprising the erection of a foodstore, measuring 3,312 sq.m (GFA) (use class A1), with 198 car parking spaces and 32 cycle spaces; an additional 3 retail units, measuring 1,034 sq.m (GFA), (use class A1 to A5); a safer neighbourhoods unit, measuring 100 sq.m (GFA) (use class D1); an 84 bed hotel (use class C1) and 22 car parking spaces and 4 cycle spaces' was refused in December 2013.

Outline planning application (ref: 4266/APP/2012/1545) for 'Erection of 5 part 4, part 5 storey blocks to provide 125 residential units (Use Class C3) with 99 car parking spaces and 150 cycle parking spaces and associated highways alterations, together with associated landscaping' was refused on 10/12/13 for the following reasons:

1. Highways
2. Development in Isolation
3. Planning Obligations
4. Traffic/Highways
5. Air Quality
6. Cumulative impact

Full application (ref: 4266/APP/2011/2034) for a 'Mixed use redevelopment comprising the erection of a foodstore, measuring 3,312 sq.m (GFA) (use class A1), with 198 car parking spaces and 32 cycle spaces; an additional 3 retail units, measuring 1,034 sq.m (GFA), (use class A1 to A5); a safer neighbourhoods unit, measuring 100 sq.m (GFA) (use class D1); an 84 bed hotel (use class C1) and 22 car parking spaces and 4 cycle spaces' was refused in December 2013.

Outline planning application (ref. 4266/APP/2011/2035) for 53 residential units (use class C3) with 56 car parking spaces and 60 cycle parking spaces and associated highways alterations together with landscape improvements was non determined.

Outline application (ref. 4266/APP/2004/2715) for the redevelopment of the site to provide a comprehensive mixed use scheme comprising class A1 food store (8,819m<sup>2</sup>), 4 retail units (805m<sup>2</sup>) and retail parking for 538 vehicles, plus 220 residential units including affordable housing and parking for 230 vehicles, highway alterations to Long Lane and Freezeland Way including new access to the site off Freezeland Way (involving demolition of the Master Brewer Motel) was refused on 23/12/04.

Application (ref. 4266/APP/2005/2978 & 4266/APP/2005/2979) were submitted for the erection of a Spenhill superstore (7,673 m<sup>2</sup>), 1,244m<sup>2</sup> of additional space for A1, A2, A3, A4 or D1 uses within the Use Classes Order, Car parking for 409 cars, 205 residential apartments, including affordable housing, together With 205 car parking spaces, highway alterations and landscaping and the demolition of the Master Brewer Hotel. Application

4266/APP/2005/2978 was refused on 14/06/06 and application 4266/APP/2005/2979 was the subject of an appeal but was subsequently withdrawn in January 2007.

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

London Borough of Hillingdon Development Plan (from 17 January 2020)

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

1.2 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)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

1.3 The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

##### **Emerging Planning Policies**

1.4 Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the

Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

#### **Part 1 Policies:**

PT1.BE1	(2012) Built Environment
PT1.EM6	(2012) Flood Risk Management
PT1.H2	(2012) Affordable Housing
PT1.HE1	(2012) Heritage
PT1.CI1	(2012) Community Infrastructure Provision
PT1.E5	(2012) Town and Local Centres
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.T1	(2012) Accessible Local Destinations

#### **Part 2 Policies:**

NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
DMEI 14	Air Quality
DMEI 7	Biodiversity Protection and Enhancement



LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
DMAV 1	Safe Operation of Airports
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DME 1	Employment Uses in Designated Sites
DME 3	Office Development
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 9	Management of Flood Risk
DMH 7	
DMHB 10	High Buildings and Structures
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DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 3.10	(2016) Definition of affordable housing
LPP 5.16	(2016) Waste net self-sufficiency
LPP 7.16	(2016) Green Belt
LPP 7.2	(2016) An inclusive environment
DMH 2	Housing Mix
DMHB 1	Heritage Assets
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMTC 3	Maintaining the Viability of Local Centres and Local Parades
LPP 7.8	(2016) Heritage assets and archaeology
SA 14	Master Brewer and Hillingdon Circus, Hillingdon

LPP 2.15	(2016) Town Centres
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.11	(2016) Affordable housing targets
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LPP 3.13	(2016) Affordable housing thresholds
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.6	(2016) Children and young people's play and informal recreation facilities
LPP 3.7	(2016) Large residential developments
LPP 3.8	(2016) Housing Choice
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.12	(2016) Improving opportunities for all
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.7	(2016) Renewable energy
LPP 6.10	(2016) Walking
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.13	(2016) Parking
LPP 6.2	(2016) Providing public transport capacity and safeguarding land for transport
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.4	(2016) Enhancing London's Transport Connectivity
LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy

## 5. Advertisement and Site Notice

**5.1** Advertisement Expiry Date:- **5th November 2019**

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

## **6. Consultations**

### **External Consultees**

The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015 as a Major Development. 1943 surrounding property owners/occupiers have been consulted. At the time of writing the report, two letters of support had been received, the contents of which are summarised below.

I would love to see new buildings in the area

Need for housing, particularly social housing and mixed developments on vacant sites

In addition, 266 single representations of objection were received as summarised below:

#### **DESIGN COMMENTS:**

Excessive in its size and scale

Excessive in height. The heights of the main blocks are four times the height of local housing, and the main tower at 11 storeys will be six storeys above the roof height of the station and the Swallow pub opposite the site on Long Lane

Excessive density

Excessive in bulk

Eleven storeys is excessive for the local context and out of character

Over development

Unsympathetic to the area

Not in keeping with the design and character of the existing area

Adverse effect on the visual amenity of the area as a whole

Too imposing

Too little consideration for green spaces and environmental quality of life for the new residents and for the many existing residents in the neighbourhood

11 storeys would cause visual deterioration to the area

Incongruous blot on the landscape

Ickenham has always been regarded as a village and this development would destroy this ethic

11 storeys high would dominate the landscape and will look awful

The highest building in the area is currently no more than 3 storeys

Would provide poor living accommodation

May lead to privacy issues as 11-storey occupants can see into private dwellings/gardens

Cumulative impact of the site opposite next to Hillingdon Station

Not appropriate in this location

Overshadowing

Will result in overcrowding

High rise not suitable for families with children

Inadequate outside space for the potential number of residents

Monstrosity of the size would destroy the area

High rise eyesore and a blot on the landscape

The site is simply not big enough to support the level of development and number of units

The scale and nature of the development is more fitting to an urban environment and does not respect the nature and character of the local area

Impact on nearby Greenbelt and conservation areas

This initial approach into Hillingdon borough is green for a reason, and marks the start of semi-countryside. It would be entirely wrong and completely change landscape and character.  
 The people living in the proposed flats would be extremely overcrowded, lacking space and putting their health at risk living on the very busy A40 road  
 Having sky scrapers would look out of character for Hillingdon  
 Would make Hillingdon circus look ugly  
 This is not an inner city residential area, this is a suburb on the fringe of the greenbelt which needs protecting and any new development should and must reflect the existing area  
 If housing should be mix of houses and flats  
 Will adversely affect existing residents quality of life  
 Would make the whole area feel built up  
 The borough needs more family homes with gardens and adequate parking  
 Out of place and an aesthetic disaster  
 The look, design and scale fail to harmonise with the local street scene  
 The eleven storey building would be an ugly intrusion and totally incongruous with the surrounding landscape  
 Over bearing  
 Oversized  
 This will ruin our suburbs  
 This will change the character of developments in the area and will set a precedent for massing in this area.

#### TRANSPORT HIGHWAYS AND PARKING:

Excessive car parking on site  
 Impact of development along with construction of HS2 (impact of closure of Breakspear Road on wider surrounding network)  
 Negative impact on the surrounding highway network with regards to traffic  
 Pedestrian safety due to the existing traffic levels at Hillingdon Circus  
 Hillingdon Circus junction would not cope with more cars  
 Site construction traffic (particularly with existing HS2 issues)  
 Significant existing issues with traffic, particularly at rush hour  
 Lack of car parking and impact on the area in terms of on street parking  
 Insufficient vehicular access  
 Hillingdon station struggles to keep up with ever increasing numbers of commuters  
 Access and egress of vehicles from the proposed site will increase congestion at the junction  
 The station car parking too expensive people already parking cars around the Oak farm estate  
 There's only one bus that takes you to Uxbridge and at peak times it's difficult to get on one  
 Would impair highway safety  
 Ickenham should maintain its village character and not be a car park  
 Public transport in that area is poor  
 Standing traffic already causes a lot of pollution, and this will only be exacerbated  
 Would exacerbate pollution levels which are dangerous to humans and wildlife  
 The right of way in and out of this site looks like an accident waiting to happen  
 Access is going to cause severe traffic problems  
 It is unrealistic to think people will do their shopping by bicycle, on foot, by bus or tube  
 Insufficient 'visitors' car parking for 514 residences  
 The Police, Fire and Ambulance services cannot get through the traffic as it is  
 Four spaces for a car club is too little  
 It already takes many minutes to navigate the adjacent pedestrian network of crossings

#### PRINCIPLE:

Additional strain on public services, school places, GPs, dentist, police and hospitals, U2 bus service, water resources and underground water pipe network

Too much building of estates and turning one house into 4/5 in the area  
 The development would be harmful to the local area and the local community  
 This development is only for profit and not on what this area needs  
 This scheme would destroy the neighbourhoods that we live and work in and actually care about  
 The Diary which is in progress of being built that is going to add to existing traffic  
 Impact on emergency services  
 The influx of people will overwhelm the whole community  
 Impact on elderly people  
 Would ruin the local area  
 High rise flats are not suitable for families with children  
 Would represent overcrowding for future residents

## POLLUTION

Would increase air pollution in the locality created by cars  
 Disruption during construction with regards to noise and dust  
 More residential accommodation and commercial units will increase air pollution and congestion  
 Noise caused by unloading and loading of delivery to commercial units would disturb local residents and homeowners  
 The negative impact on health from being so close to the A40  
 Atmospheric pollution from flights  
 This site is unfit for human habitation due to air quality  
 Poor quality of external amenity space given noise and air pollution of the site  
 Noise from RAF Northolt

## OTHER:

Unsustainable  
 Would increase risk of terrorist attack given proximity to flight path and RAF Northolt  
 The Developers identify Court Park and Hillingdon Farms open area as places for recreation and these should be signed, lit up and paved. The alleyway from Hercies Road to Sweetcroft Lane/Court Park needs improvement  
 Negative impact on the local community  
 De-value Ickenham property prices  
 Detrimental to the quality of life of the surrounding area  
 Serious crime in the area is on the increase and this 'estate' would take advantage of the proximity to county lines  
 Impact on Hillingdon Hospital and the local A & E  
 Impact on sustainability of local high street shops which again will ruin the village ethos  
 The sewer system is unable to cope with the current demand and this development will only compound the situation.  
 A housing estate of this size will bring down the area  
 Detrimental effect on the existing residential amenities  
 Lack of nurseries and children's centres in the local vicinity  
 Classroom numbers will increase and our choices will be unfairly limited  
 People will buy them as buy to let's which won't create a Community  
 This development will put further strain on the Flooding of Yeading brook during rain fall and increase risk of property damage from flooding  
 Local schools have already expanded and most of them now lacking in any meaningful outdoor facilities  
 Lack of consultation with the GPS currently operating at the Hillingdon Health Centre (opposite the site). A potential increase of 1000 new residents and patients will cause great disruption to the Practice. The surgery building will not be able to cope and there is a shortage of doctors and nurses currently.

Wildlife habitats will be destroyed  
 The roads are flooding in bad rain as green areas are being built on  
 Ecology and biodiversity  
 Global climate disruption  
 Leave it as a green area for walks and children to play  
 The commercial units will have an impact on the local shops, could be left empty and end up being vandalised  
 It will create a darkness in the neighbourhood  
 The former Master Brewer site would be better served by a community hall or hub so that young and older members of the community can use it.  
 A tree planting venture would be ideal  
 This development could end up as a slum of the future  
 This is suburban outer London, not crowded inner London  
 The high density, due to overcrowding could lead to increased levels of violence and civil unrest  
 There is already problems in the area because there is nowhere for teenagers to go and be safe  
 The properties would have no private gardens space, leading to issues with communal areas and anti social behaviour  
 There is no police presence so the "communal" green space would not be policed  
 At present Green Belt views are visible and uninterrupted in most directions  
 Impact on Ickenham Manor, a grade 1 listed building set in the Green Belt and conservation area whose land includes a scheduled ancient monument and is a designated site of special architectural importance  
 The existing long unhindered views in this location will be severely impacted  
 Living alongside a motorway is not beneficial for anyone. The people living there will be affected with noise and bad air quality and their mental health will deteriorate.  
 There are no social places accessible in walking distance  
 Lack of play space for little children  
 This is zone 6 and not zone 1 or 2  
 There is no benefit to the local community in this development  
 The overcrowding in the area (urban sprawl), leads to stress and a less enjoyable environment in which to live.  
 An alternative for this site would be as a retail/leisure facility (bowling/cinema) where noise and air quality would not be such an issue  
 Fire safety for those in high rise flats  
 This development will not take into account nature, wildlife and protected trees  
 Negative impact on nearby conservation areas  
 Negative impact on and encroaching into the Green Belt

#### GREATER LONDON AUTHORITY (GLA)

In their Stage 1 report dated 02/12/19, the GLA provided the following comments:

##### Principle of development

13. The principle of a residential-led mixed-use development on the site has been established through the site's planning history. Furthermore, Hillingdon Council's emerging draft Local Plan: Part 2 - Development Management Policies, Site Allocations and Designations and Policies identifies the site for residential-led, mixed-use development (SA Master Brewer and Hillingdon Circus, Hillingdon (Site B)). The emerging allocation comprises both the site and the vacant land located adjacent to the site on the western side of Long Lane, known as 'Hillingdon Circus'.

14 The London Plan sets a 10-year housing target of 5,590 and an annual monitoring target of 559 new homes per year in Hillingdon per year between 2015 and 2025. The redevelopment of the site to provide a mixed use residential led scheme providing 514 new residential units equates to 9.2% of 10 year target and is therefore strongly supported. Draft London Plan Policy H1 proposes to increase this 10-year target to 15,530, whilst the Panel Inspector's report recommends this be

reduced to 10,830, which remains substantially higher than the current London Plan target. The proposed housing delivery on this accessible brownfield site is therefore strongly supported.

15 London Plan Policy 4.7 and draft London Plan Policy SD6 all set out a town centre first approach to the provision of new town centre uses. The London Plan establishes that edge or out of centre retail development must be subject to an assessment of impact. Flexible floorspace is proposed which may include workspace, affordable workspace, community uses and retail uses, totalling 1,250 sq.m.. The flexible uses are proposed within the ground floors of the blocks at the edges of the blocks fronting onto the public realm. The proposed flexible uses are intended to satisfy the localised need arising from the proposed new homes and the development expected to come forward in the wider area. Given the limited scale of the proposed flexible uses at the site, which fall below the NPPF threshold for the need for a retail impact assessment, it would not prejudice the vitality or viability of the boroughs Town Centre locations.

16 London Plan Policy 7.16 and draft London Plan Policy G2 afford Green Belt Land the strongest protection in accordance with national guidance. The NPPF through paragraphs 133- 147 affords the strongest possible protection to Green Belt. There is a small strip of Green Belt in the ownership of the applicant to the eastern edge of the plot however it should be noted that this does not fall within the application's red line boundary. This land is not proposed to be developed on but discussions are ongoing between the applicant and the Council to secure enhancement works to this parcel of land as part of the S.106 package. These enhancement works should constitute appropriate development on the Green Belt, increasing its value which is supported in accordance with the policies outlined above.

#### Housing

17 The proposed housing mix is set out below:

Market total = 332 (134 x 1 bed, 154 x 2 bed, 44 x 3 bed)

Intermediate (Shared ownership) total = 61 (34 x 1 bed, 27 x 2 bed)

Intermediate (affordable rent) total = 121 (53 x 1 bed, 35 x 2 bed, 33 x 3 bed)

#### Affordable Housing

18 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the draft London Plan (Consolidated Version of Changes (July 2019)) identifies a minimum threshold of 35% (by habitable room) affordable housing, with an upper threshold of 50% for publicly owned land. Applications providing the relevant threshold level of affordable housing before public subsidy; with an appropriate tenure split; having explored potential additionality through grant funding; and, meeting all other relevant policy requirements and obligations to the satisfaction of the Mayor and Local Planning Authority can follow the 'Fast Track Route' route as set out within draft London Plan Policy H6 and the Mayor's Affordable Housing and Viability SPG. Such applications would not need to submit a viability assessment, and would not require a late stage viability review mechanism to be secured as part of any Section 106 agreement.

19 Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set out a tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority. If the proposal does not meet the requirements of the draft London Plan threshold approach, and/or if the LPA is not satisfied that the proposed tenure split appropriately responds to local need, an application must be determined under the 'Viability Tested Route' - requiring submission of a full viability assessment for rigorous independent review.

20 The applicant has proposed 35% affordable housing by habitable room before subsidy. The affordable housing tenure mix comprises; 30% shared ownership and 70% London Affordable Rent.

This is strongly supported in principle. The applicant team must agree the tenure split with Hillingdon Council in accordance with the principles of the draft London Plan. The applicant must explore the availability of grant funding to further increase the affordable housing offer and an early stage review mechanism must be secured in the S106 agreement.

21 The Mayor is committed to the delivery of genuinely affordable housing and draft London Plan Policy H7; the Mayor's Affordable Housing and Viability SPG; and, the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products. The applicant has confirmed that in accordance with the Mayor's preference the affordable rented products will be secured at London Affordable Rent benchmark levels. The intermediate shared ownership products should be secured as affordable to a range of incomes below the upper limit of £90,000 per annum, and benchmarked against the monitoring figure of £56,200 per annum in the London Plan Annual Monitoring Report. All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement.

#### Residential Mix

22 London Plan Policy 3.8 encourages new developments to offer a range of housing choices in terms of mix and size. Draft London Plan Policy H12 recognises that a higher proportion of one and two-bedroom units is generally more appropriate in more central or urban locations. The applicant is proposing the following housing mix:

- 1 bedroom 52%
- 2 bedroom 32%
- 3 bedroom 16%

23 In strategic planning terms the housing mix outlined above is an appropriate response to local need offering an adequate proportion of family sized accommodation given the site circumstances. The provision of family housing has been appropriately prioritised within the social/affordable rent component of the mix, in response to identified strategic need which is strongly supported.

#### Residential quality

24 London Plan Policy 3.5 and Policy D4 of the draft London Plan promote quality in new housing provision, with further guidance provided in the Housing SPG. The scheme has been designed to meet and exceed national, London Plan and draft London Plan minimum residential space standards.

25 The applicant has confirmed that the blocks will benefit from efficient unit to core ratios, there are no single aspect north facing units and internal spaces will, as far as is practical be well-defined, sun-lit. The applicant has also ensured that all units have access to adequate private shared amenity spaces. It is acknowledged that as far as practical the applicant has ensured that all ground floor units have include direct front door access which helps animate the streets and spaces and promote passive surveillance. The exception to this includes buildings 11 and 12, whilst building 8 has a mix of units which have direct access. This is acceptable.

#### Children's playspace

26 London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Mayor's Play and Recreation SPG and draft London Plan Policy S4 expect a minimum of 10 sq.m. per child to be provided in new developments, and makes clear that play space should not be segregated by tenure. The GLA playspace calculator has recently been refined. Furthermore, policy S4 of the draft London Plan makes it clear that play space in new residential developments should not be segregated by tenure. The scheme has been calculated to produce a child yield of 184 requiring the provision of 1,841.6 sq.m. of playspace. The applicant is providing a total of 2,078 sq.m. which includes the provision of 1,157 sq.m. of playspace for children 0-5 years. This provision exceeds the requirements set out above and should be secured by appropriate planning condition.



## Fire safety

27 In accordance with Policy D11 of the draft London Plan, the Council should secure an informative prescribing the submission of a fire statement, produced by a third party suitable qualified assessor, in consultation with the London Fire Brigade.

## Urban design

### Layout

28 The proposed masterplan would introduce two main routes east to west through this vacant brownfield site - helping to connect the plot in the east, with adjacent Green Belt land to the west. The street pattern created by the above-mentioned primary routes helps to set up a conventional arrangement of blocks either side of the three main routes. There are two routes which run north/south to connect the two primary routes which run across the site. Creating a strong sense of arrival at the prominent south western entry corner is supported. The perimeter blocks would serve to reduce noise and air quality issues to the central spaces of the plot, which have been characterised for community/commercial and amenity spaces. This approach is supported in order to buffer the wider masterplan from road noise. The layout and ground floor of the masterplan is generally supported and seeks to maximise active frontage to the ground floor. Based on the visualisations and plans provided to date, the quality of the proposed public realm strategy is supported. The block layout is broadly supported and strikes a good balance between offering a range of housing typologies, character areas within the site and a legible sequence of streets and spaces.

### Height and massing

29 London Plan Policies 7.1 and 7.4 and draft London Plan Policies D1 and D2 require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The application proposes the construction of 12 blocks ranging between 2 and 11 storeys. The intention to contain the taller elements of the scheme towards the western edge of the site including at the entry to the site at Hillingdon Circus which is supported. The blocks which run parallel to Western Avenue (A40) would be a minimum of 5-storeys which would help reduce the noise and air quality impacts arising from the proximity to the highway. The proposed height and massing strategy responds well to the site's contexts with the tallest elements along the south western edge and the lowest components adjacent to the neighbouring Green Belt. The applicant has demonstrated that the development potential of the site has been optimised through a design led iterative process of pre-application engagement with the GLA which has resulted in a successful height and massing strategy which responds well to the immediate context.

### Architecture

30 The architecture of the scheme promote visual links to the surrounding suburban context through the use of mansard roofs, arched thresholds and a material palette which respond well to the surrounds. The intention to respond to the established residential character of the surrounding area through the use of architectural features such as pitched roofs, proportions of key facades and materials is welcomed. The plot has been subdivided into a number of character areas which benefit from a distinct architectural approach but which share key details to ensure the masterplan is read as a single coherent piece. All buildings will use brick for the main body of the developments with varying typologies and brick shades establishing the character areas of the site. for example the buildings in closest proximity to the Green Belt have been finished with a green coloured brick. The material palette is supported and does not present any strategic design concern.

### Density

31 London Plan Policy 3.4 and draft London Plan Policy D1B 'Optimising site capacity through the

design-led approach' seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the design, as described in draft London Plan Policies D4 'Housing quality and standards' and D2 'Delivering good design'. Policy D2 identifies that proposals with a density of over 350 units per hectare (defined as 'higher density') or include a tall building (as defined by the Borough, or above 30 metres), should be subject to a greater level of design scrutiny, as is the case here. Draft London Plan Policy D1A states that the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels; and 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).

32 Whilst the residential density of the scheme exceeds that of surrounding neighbours, it is an appropriate response to development of a brownfield site, contributing positively to achievement of the substantially higher housing targets of the draft London Plan. The height and massing strategy enhances the character of the area and the design is considered to be of the highest quality. The site's adjacency to the Hillingdon Station and the proposed bus mitigation (set out in the transport section below) ensures there is adequate local transport connections to the site enabling the site to be developed sustainably. GLA officers are therefore supportive of the optimisation of this brownfield site.

#### Impact on Green Belt

33 London Plan Policy 7.16 and draft London Plan Policy G2 afford Green Belt Land the strongest protection in accordance with national guidance. The NPPF through paragraphs 133- 147 affords the strongest possible protection to Green Belt. The NPPF provides that construction of new buildings should be regarded as inappropriate save for certain limited exceptions set out in paragraph 145. Whilst there is no development proposed in the Green Belt, the scheme will abut the Green Belt land which adjoins the site boundary and extends east. The applicant has ensured through the design of the scheme that any visual impact on this land is minimised as far as possible. The buildings in closest proximity to the Green Belt will be finished in green toned bricks, benefit from a balcony arrangement which seeks to emulate a 'pergola' style and is lower rise than many elements of the master plan. It is understood that the applicant has acquired a strip of Green Belt land directly between the site and the wider body of Green Belt within which enhancement works are proposed to be secured through the S.106. All of these measures serve to minimise the visual impact on the Green Belt and provide a soft urban edge to the open land at this edge of the site.

#### Heritage and conservation

34 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. Any harm identified must be given considerable weight and importance.

35 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than

substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 'Heritage conservation and growth' of the draft London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non designated heritage assets.

36 The application site itself does not fall within a conservation area, nor does it contain any listed buildings. The Ickenham Village Conservation Area and other heritage assets fall within a kilometre of the site, most notably Ickenham Manor which is Grade I listed and Long Lane Farm Cottages which are Grade II listed. Given the separation distance which exists between the proposed development and the heritage assets which fall beyond the A40 GLA officers are generally satisfied that there would be no harm to the setting of the assets. The comprehensive redevelopment of the site would make the most efficient use of land and optimise residential and non-residential uses which is supported from a strategic perspective. The proposed scheme it is noted would introduces distinctive, high quality architecture, which is scaled to address the established character of the area.

#### Inclusive access

37 London Plan Policy 7.2 and draft London Plan Policy D3 require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all.

38 London Plan Policy 3.8 and draft London Plan D5 require that 10% of new housing is delivered as designed to be wheelchair accessible and that the remaining 90% are easily adaptable for residents who are wheelchair users. The applicant has confirmed that 10% of the dwellings will be provided in line with the requirements above. This must be secured by way of planning condition.

#### Sustainable development

##### Air quality

39 A core priority of the Mayor's London Environment Strategy (2018) is to improve London's air quality and protect public health by reducing exposure to poor air quality, particularly for the most disadvantaged and those in priority locations such as Air Quality Focus Areas, and outlines a range of initiatives which seek to improve the capital's air quality over time, including the Ultra Low Emission Zone (ULEZ). London Plan Policy 7.14 and Policy SI1 of the draft London Plan state that London's air quality should be significantly improved and exposure to poor air quality should be reduced, especially for vulnerable people. Policy SI1 states that development proposals should not create unacceptable risk of high levels of exposure to poor air quality and should ensure design solutions are incorporated to prevent or minimise increased exposure to existing air pollution. The site's northern boundary runs parallel to the A40 which presents noise and air quality constraints for the site. The Council must secure appropriate air quality mitigation measures as part of any future planning permission.

##### Energy

40 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); Air Source Heat Pumps is proposed in a central block-by-block pump system for each building; and, renewable technologies (comprising 929 sq.m. of photovoltaic panels). A roof plan demonstrating PV installation has been maximised should be submitted. The approach proposed would achieve a 38% carbon dioxide reduction for the residential component of the scheme and a 37% reduction for the non-residential component. Whilst the principles of the energy strategy are supported, the applicant must explore the potential for additional measures to deliver further carbon

dioxide reductions. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.

#### Drainage and floodrisk

41 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and draft London Plan policy SI.12. The surface water drainage strategy for the proposed development complies with London Plan policy 5.13 and draft policy SI.13.

42 The proposed development does not meet the requirements of London Plan policy 5.15 and draft London Plan policy SI.5 as it does not meet the water consumption targets of these policies. The applicant must provide water efficiency information for both the residential and non-residential components of the scheme.

#### Urban greening

43 London Plan Policies 5.10 and 7.21 seek to retain existing trees of value, or mitigate their loss, and require developments to incorporate urban greening measures. Draft London Plan policies G5 and G7 go beyond the London Plan policies by embedding urban greening measures and retention of existing trees of quality into the planning process. As set out in draft London plan Policy G5 the Mayor has developed a generic Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities. The factors outlined in Table 8.2 of the policy are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation.

44 The application includes a well-considered approach to green infrastructure, particularly with regard to the site's strategic position for ecological and recreational connectivity. The urban greening factor must be calculated and submitted prior to the Mayor's decision making. A plan colour coding the surface cover types set out within draft London Plan Policy G5 and an accompanying calculation table should also be provided prior to Stage 2. Although a tree constraints plan has been provided, further clarification is required regarding the total number of trees proposed for removal. The proposal should ensure that, wherever possible, existing trees of quality are retained. Where it is imperative that trees are removed, there should be adequate replacement based on the existing value of the trees determined by i-tree or CAVAT.

#### Transport

##### Site access

45 Vehicle access via a priority junction is proposed in place of the existing site access location along Freezeland Way, approximately 50 metres east of the Hillingdon Circus junction. Pedestrian access will be provided via access points on Freezeland Way and Long Lane adjacent to Hillingdon Circus. Both are acceptable subject to the details of the highway scheme at Hillingdon Circus being agreed.

##### Car parking

46 London Plan Policy 6.13 and draft London Plan Policy T6 require developments to provide the appropriate level of car parking provision. A total of 164 car parking spaces are proposed (equivalent to 0.3 spaces per units.). These spaces would be located in podium car parks around the site with some spaces on the internal roads. Of the total provision 16 blue badge spaces will be spread across the site which accords with the draft London Plan requirement. In accordance with draft London Plan policy T6.1 the applicant should demonstrate how and where general car parking spaces could be converted to provide a further 7% of residential units with a blue badge space if required. Six general car parking spaces for visitors and the commercial units are proposed, this is

welcomed. However, at least one of these spaces should be allocated for use by blue badge holders. Electric vehicle charging points will be provided in accordance with draft London Plan policy.

47 Four car club spaces are proposed within the development site. in the first instance one space would be provided upon first occupation of the development, with up to three further vehicles being introduced depending on monitoring / demand. This is welcomed.

48 A draft Car Parking Management Plan has been submitted in support of the application, the final plan must be secured by planning condition. Occupiers should also be exempt from eligibility for parking permits on surrounding streets and on-site spaces should be leased not sold.

#### Cycle parking

49 Cycle parking meets the minimum requirements of draft London Plan policy T5 is proposed for all land uses. It is welcomed that this has been designed in accordance with the London Cycle Design Standards. Long stay cycle parking alongside lockers, showers and changing facilities will be located within the proposed Cycle Hub located adjacent to Building 4. Continuous access and operation of the 'Hub' must be secured as part of any future S.106 agreement.

#### Healthy streets

50 A number of interventions at Hillingdon Circus, including upgrades to pedestrian crossing are proposed to support the development. These have been the subject of a Stage 1 Road Safety Audit. TfL requests that further discussion takes place prior to determination of the application to agree the full package of highway interventions.

#### Public transport

51 The proposed development is expected to generate 88 and 53 two-way bus trips in the AM and PM peaks respectively. In order to ensure that sufficient sustainable transport is in place to support the development, a financial contribution must be secured to increase the frequency of route 278 from four to five buses per hour. The estimated cost of delivering this is £455,000 per annum, therefore the total cost to cover three years pump priming is £1.365 million which should be secured as part of any future S.106.

52 The transport assessment includes a station capacity assessment. This assessment needs to be refined in accordance with detailed comments provided to the applicant in order to demonstrate that the additional trips generated by the proposals can be accommodated within the existing station infrastructure.

#### Travel planning, delivery and servicing and construction

53 The applicant has submitted a draft travel plan, delivery and servicing and construction logistics plan. Within the travel plan the target relating to increasing car club use should be deleted and replaced with a target better reflecting the ambitions in the Mayor's Transport Strategy to increase active travel. Notwithstanding this, the plans are generally acceptable in strategic transport terms and should be secured by appropriate planning condition.

#### Local planning authority's position

54 The local planning authority is still assessing the application and yet to identify a target planning committee date. Legal considerations

55 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the

Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

#### Financial considerations

56 There are no financial considerations at this stage.

#### Conclusion

57 London Plan policies on land use principles, housing, affordable housing, sustainable development and transport are relevant to this application. While the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the following reasons:

- Principle of development: The redevelopment of this vacant brownfield site to deliver a significant quantum of housing and affordable housing alongside commercial and community floorspace is strongly supported.
- Housing: The applicant is proposing 35% affordable housing (by habitable room) at a tenure split of 70/30 in favour of affordable rent comprising London Affordable Rent and Shared Ownership meets the Fast Track Route. The Council must robustly secure the offer in the S106 including an early stage review mechanism.
- Urban design: The design quality of the scheme is considered to be of high quality and the site appropriately optimised. The Council should secure the submission of key facing materials. The proposal would not have an adverse visual impact on the adjoining Green Belt Land or on neighbouring heritage assets.
- Sustainable development: Further information and justification is required in respect of energy, flood risk and drainage and urban greening.
- Transport: The applicant is required to address issues in respect of; site access and healthy streets. The Council must secure by condition/obligation; a car parking management plan, disabled parking provision, cycle parking, a travel plan, a construction logistics plan and delivery and servicing plans in addition to a £1.365 million contribution to increase the frequency of local bus services.

#### MINISTRY OF DEFENCE (MOD)

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 11/10/19.

The applicant seeks full planning permission for the above proposed development at the former Master Brewer site in Hillingdon. The proposed development comprises the construction of a residential-led, mixed-use development including a number of buildings between two and eleven storeys, landscaping, SUDS and other associated infrastructure.

The application relates to land close to RAF Northolt, an airfield that accommodates units from all three-Armed Services and provides a home for both 32 (The Royal) Squadron and 63 Squadron RAF Regiment (Queen's Colour Squadron), during the 2012 Olympics Northolt hosted four Typhoon fighter aircraft. The application site is located 1.96km west from the centre of the runway at RAF Northolt and approximately 1.1km west of the threshold of runway 07/25. The site occupies the statutory height, birdstrike and technical safeguarding zones surrounding RAF Northolt.

#### Aerodrome heights and Technical safeguarding zones

The proposed development site occupies the statutory aerodrome 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 also safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre.

Having made safeguarding assessments based on the grid references of the four corners for each proposed tower block (12 in total), I can confirm the MOD has no safeguarding objections regarding the proposed building heights for this development.

#### Birdstrike safeguarding zone

The application site is also within the birdstrike safeguarding zone, within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.

Several of the buildings are proposed to have brown or green roofs of varying design, including brown roofs and ornamental roof terraces. These have the potential to be attractive to roosting / nesting hazardous birds such as large gulls.

The drainage strategy for the site includes green roofs, permeable paving, rain gardens and swales. Other than the green roofs, the other aspect of this which has the potential to attract or support hazardous birds are the swales. These are to be planted with a wetland meadow mix comprising a range of flowering plants and grasses and would appear to be generally dry. As long as they are usually dry, and the planting is maintained then this should prevent these features resulting in an attractant for hazardous birds.

The developer has submitted a Bird Hazard Management Plan (BHMP) to mitigate any potential birdstrike risks / hazards. Having reviewed the plan the MOD can confirm the provisions set out within the BHMP would provide a robust and effective mitigation of the risk posed by the development, it is requested that any permission issued is subject to a condition requiring that the development is carried out strictly in accordance with the submitted BHMP and that those measures set out within the BHMP are implemented in perpetuity.

In summary as long as the swales are generally dry and the BHMP is included as a conditional requirement (and in perpetuity) as part of any planning permission granted, the MOD has no objections to this development.

#### Cranes

The MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect the performance of the Precision Approach Radar (PAR) and air traffic safety. If the redevelopment of this site does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures.

The MOD would request that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

#### Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence. The Construction Management Strategy shall cover the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting).

The approved strategy (or any variation approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence) shall be implemented for the duration of the construction period.

Reason:

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.

Subject to the inclusion of the specified conditions in any planning permission granted, the MOD maintains no safeguarding objection to this application.

I would be grateful if you could confirm receipt of this letter and confirm that conditions meeting the MOD's requirements are included in any consent granted.

It is important that the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Hillingdon Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

#### **External Consultees (Additional)**

##### **OAK FARM RESIDENTS ASSOCIATION**

The Oak Farm Residents Association (OFRA) wishes to object to the planning application above, primarily in respect of its excessive height, density and massing and the extra burden on local health and education services, but also to the detrimental impact this will have on our local environment and its semi-rural, suburban character.

In scale and style this proposal fails to harmonise with its environment and would dominate its surroundings to such an extent that it would detrimentally change the established character of the area. In our opinion, the proposal comprehensively fails to respect national, London and local planning policies which ensure that any development is in keeping with its locality. The proposed density is over twice the prescribed norms.

The key planning constraints of the site are well known:

- chronic congestion at peak and surrounding hours,
- severe noise levels that either breach WHO ambient guidelines for residential areas, or sit in the upper tolerance zones, even after mitigation measures have been applied. Noise levels regularly exceed 100db at the boundary and 90db at some parts of the site,
- existing poor air and particulate quality will be made even worse with a development of this density and scale.

All of these issues point to the need for a much smaller and more sustainable development which respects local character and the scale of its surroundings.

We are concerned that the current proposal ignores almost completely, the clear planning guidance given by Hillingdon Borough in its rejection of the similar, but smaller, MB Homes' proposal earlier this year, and significantly scales up the development in size and density, increasing the maximum height to 11 storeys. The only concessions have been minor architectural design features, with limited introduction of dormer style roofs, better architectural landscaping and biodiversity schemes at ground level.

The proposal is totally out of keeping with its locality and at the current scale, style and height is in no way responsive to local needs, or representative of the feedback from residents. The Planning Case Officer should also note that the applicant has cleared trees and vegetation in the central section of the land, including a TPO marked area, despite the advice of initial ecological and biodiversity assessments which noted the site's potential habitat value and its proximity to SSSI's and which stated specifically that no work should be undertaken until more detailed assessments have been completed.



It is fair to say that the current submission has generated dismay and disbelief in the local community, with Inland Homes choosing to increase size of the development by more than 20% over its rejected predecessor. Stakeholder and community consultation has clearly been a tick box exercise, as OFRA residents argued strongly that the 9 storeys shown in the designs presented to us in the initial meetings were already too high. GLA comments are similarly detached from the realities of the site, and are selective in their interpretation of planning guidance, simply promoting a higher housing density. It should also be noted that Hillingdon has consistently exceeded its target for new homes and reached 160% of target in 2017/18.

While as an Association we welcome the proposed 35% affordable housing and the reduction to 0.3 parking spaces per unit, because the local road network simply cannot handle any additional traffic, our objections to the proposal are substantially the same as those against the Meyer Homes' plans in 2018. At the newly proposed scale, height and density the impact of this development would be detrimental to local quality of life, increase local congestion and be completely out of keeping with local expectations. These expectations were clearly voiced at Residents' Meetings and at Inland Homes' consultation / exhibition. Residents are dismayed that a few individuals' comments were reported selectively and out-of-context in the report submitted to the planning committee by Terrapin Communications. Although these personal views were positive, the general consensus of the Residents' Association is that these plans are too high and too dense.

#### Headline issues

The proposal provides a scheme that ignores London Plan Policy D1 B 1 which states that development design should respond to the local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including existing and emerging street hierarchy, building types, forms and proportions. Comments by the GLA planning team suggest that it has again been selective in its interpretation of the London and Draft London Plan policies and commitments, in order to steer the developer in the direction of a higher density scheme which ignores local character, prevailing style and the planning constraints of the site. This is a noise sensitive, poor air quality location with appalling congestion at peak hours. A development of this density will negatively impact air quality and local infrastructure. To date the GLA has failed to appreciate the specifics of the site's surroundings or to consider the risks to public health of such a high-density development in this location.

The design remains central-urban in nature and scale, dwarfing and dominating its immediate surroundings; building style and appearance do not harmonise with locally prevailing design and height, with only minor local architectural references included. The current design would substantially alter the character of the suburban locality and be detrimental to and dominate the local amenity.

The height and density of the development has increased from the previous scheme. The previous Townscape assessment acknowledged that the scheme would have a High Adverse Effect, changing the existing roofline and scale of the streetscape at Long Lane, Freezeland Way and Hillingdon Circus. The assertion in the Bradley Murphy Design architects' assessment (2018) that this would be prominent but in equilibrium with prevailing townscape characteristics was absurd. Given the increased height and scale of the new proposal, any assertion that the overall design harmonises with local environment is now even less credible, and was contradicted by the Montagu Evans assessment in 2017/18 for the same site. Scale-up was acknowledged by planning authorities to be too high even at the 7 storeys proposed previously.

The updated Bird Hazard Assessment re-states that the height and predominately flat roof design will create a habitat attractive to species observed in the locality, and on completion risk changing the balance of current wildlife populations, weighted towards those species more hazardous to aircraft, therefore increasing the likelihood of Bird Strike. Given the site's position next to RAF

Northolt and potential changes to mixed use air corridors, this is a major concern and remains a risk that has not been adequately considered.

The Acoustic Noise Impact Assessment demonstrates that in its current form the development fails to meet maximum WHO and BS8233 standards for community noise, and the ratings applied were lower than they should be for a noise sensitive development that potentially achieves a SOAEL rating. We request that the Borough makes its own independent assessment to confirm the findings. Nearly all areas of the development continue to exceed the LAeq 8hr 30db noise limit for bedrooms at night, even after design mitigation and insulation has been applied. These constraints can only be addressed by a lower density, less intensive development.

The London Plan states that noise sensitive development should be separated from major noise sources by distance and screening. As before, this proposal does not effectively provide this, with the accommodation facing Long Lane and beside the A40 and tube-line currently too close to the roads and major sources of noise to provide suitable conditions for habitation.

The Local Plan states that London Borough of Hillingdon will seek to ensure that noise sensitive development will only be permitted if noise impacts can be adequately controlled. Currently this is not the case.

The Mayor's Ambient Noise Strategy states that proposed development should have particular regard for the impact of aviation noise on noise sensitive development, but aviation noise has not been included nor incorporated into measurements supplied to date, the current assessment is therefore not fully evidenced to the standards dictated by GLA commitments and policy.

#### Detailed objection points

Given the constraints of the site, which are highlighted throughout the Borough's planning and local implementation guidance, the new scheme is unsuitable in housing density and scale, which both far exceed established norms in the surrounding areas. Its height and appearance are of central-urban design and would have significant and negative impact on the local amenity, which is characteristically suburban in nature.

The increase in scale above the buildings in Hillingdon Circus and the surrounding area remains too great at over three times (four in places) the existing streetscape.

Harmonisation is poor, with the overall design representing a complete departure from the prevailing style and landscape of its surroundings. The overriding visual impression is of a development conceived without due regard to its surroundings;

Existing greenbelt views would be significantly compromised at points in Hillingdon East (from Granville Road, Freezeland Way, Hillingdon Circus) and the proposed scheme would be overbearing from Ickenham Manor and the Ickenham Marshes conservation area and its approaches;

The dominant outline and scale of the design is exacerbated by its core flat-roof design in an area that is predominantly pitched. The low-rise nature of local buildings is the prevailing feature of the Ward as a whole. The current design makes only minor concessions to this local feature, and in a very small number of areas;

Local buildings are almost exclusively two-to-three storeys and of suburban Metro style, interspersed with older village centres. Since its construction nearly a century ago, the design of the shopping parade at Hillingdon Circus has hardly changed. Views from Hillingdon station currently present an unbroken tree line in all directions. At an average height of eight floors the proposed development would irrevocably damage this setting and view. The report by Montagu Evans in 2018, prepared for the previous application by Meyer Homes, clearly states that without significant

reduction in height and softening of the upper storeys' appearance, the scale of the buildings would negatively impact the local environment. This new proposal exceeds the height of its predecessor;

The site sits in a TfL and Borough air quality focus zone. Planning approval at this scale and density would inevitably produce an increase in congestion and car movements, and would negatively affect air quality. The scheme is projected to add around 100 car and passenger journeys to Hillingdon Circus at peak hours, however given the overall size of 514 units we consider this to be an underestimate that doesn't adequately consider potential pick-up traffic or taxi use that will certainly be generated by a development of this size. We are also concerned that no consideration has been given to car-ownership above the 165 parking spaces.

The Borough has well-stated commitments and targets in Local Transport, Environmental and Air Quality Plans to reduce congestion and improve air quality levels at A437 Long Lane /A40 Freezeland Way. Of the total NO2 emissions for Hillingdon, over 51% is from ground-based transport. This is the highest percentage and per capita figure for all the London boroughs. Even a 0.3 parking ratio will significantly increase congestion, but the assessment fails to give due weight to the fact that traffic is often at a standstill and any traffic attempting to enter and exit the site would be entering directly into a pinch point, and have a higher knock-on effect. The Transport assessment assertion that there would be a negligible increase in car journeys fails to consider the impact that even a small increase will have at this junction.

The starting assertion in planning terms, that the Master Brewer site represents an 'island' and should therefore (for so-far unsupported reasons) allow higher housing densities to be considered, is false. Existing projections and aspirations of both LBH and potential developers for additional development at site B, culminating in a fully developed and linked residential and mixed intersection, are well documented and therefore become material in the consideration of housing density. In fact, national planning guidelines promote this as a consideration for a lower density, spatially- spread development.

Architecturally the proposal indicates large urban blocks and is completely unrepresentative of the prevailing style around it. At ground level the visual impact is reasonable, showing soft landscaping, and we welcome the reported involvement of the London Wildlife Trust, however the design fails to reflect the local, largely residential character; it has a flat roof design in an area that is predominantly pitch-roofed. As a basic large block design, it fails to meet the key design brief to provide a visual link or extension to Hillingdon Circus.

Similarly, the proposed landmark building is around three times the height of the buildings opposite and would dominate the Hillingdon Circus junction. This level of scale-up is physically and visually overbearing;

At eight, nine and eleven storeys, the height of the northern buildings, even considering the topography of the site, is too high. As stated, established development surrounding the site is mainly two storeys (three including accessible roof space) for at least a 1.5 miles in all directions, with the exception of one small building in Hercies Road, and the new Express Dairy development behind the shops in Long Lane. The current design would rise, on average, three storeys above the chimney height of the Swallow Public House opposite (current highest point in the area) increasing to 6 storeys above average for the proposed 11-storey building.

Assessment against the Mayors Healthy Street Indicators (Transport Assessment sections 4.6 and 4.7) confirms vehicle dominance on surrounding approaches to the site, with traffic frequently at a standstill, but it fails to give any evidence of how the development will address this or achieve improved uptake of sustainable travel as part of its mitigation response.

Mitigation measures against the street noise of key routes are either missing or weak.

Health services in the immediate area are already oversubscribed, particularly the GP and dental surgeries. Local services cannot support development at higher than currently established densities. These services are already difficult to access at peak hours, because of congestion levels. Local Primary schools have already been enlarged and are approaching full capacity. Pedestrian access would require under-11s to negotiate major roads and busy junctions, with a 30-minute-plus walk. Residential roads around the schools already suffer from major congestion at school times.

#### Air Quality and Noise Disturbance

Air Quality and Noise pollution are two of the three major constraints present at the Master Brewer site (the third being the congestion of the immediate road network). National Planning and GLA guidance state quite clearly that there should not be a presumption for development where these limits are routinely exceeded. As air quality and noise pollution exceed legal limits, should the building go ahead, then scale, housing density and layout should be designed to effectively mitigate these risks.

Internally, individual dwellings should be of a size that mitigates these risks, separating noise sensitive areas from major noise sources. Screening, distance and internal layout should be employed in preference to relying on sound insulation (London Plan Policy 7.15). The proposal's density and scale fail to meet these requirements and the Ambient Noise Policy guidelines.

The proposed layout with a solid outer wall of buildings, would act as a partial barrier to the A40 and tube line noise levels, but the high density and the number of units proposed would increase individual exposure. Exposure at the sixth, seventh and eighth floors at the perimeter will be higher because of continuous and greater all-round exposure.

The Noise and Acoustic assessment supplied by the applicant demonstrates that the proposal currently breaches acceptable limits for residential accommodation during both day and night; the maximum limit is 55db (day) and an ambient 45db at night. FOI figures from 2017 recorded measurements of 83db, 78db and 90db during the day and 78-74db / 88-84db ranges at night at the site boundary. Measurements quoted for previous applications by Meyer Homes' consultants recorded inner amenity areas at 55-60db which exceeds the upper WHO limit for residential developments. Perimeter measurements taken this year using a Smart Phone app recorded 90db with a consistent exceedance rate of 70db. On these grounds alone, housing density, height and upper floor design need to be revised and scaled back to cope with noise disturbance. Currently, few areas meet acceptable standards:

- Building 1 - only the rear (east) will meet the BS8233 guideline levels;
- Buildings 2, 3 and 4 - only the courtyard within the buildings will meet the BS8233 guidelines;
- Buildings 5 and 6 - the podium area between the buildings will exceed the BS8233 guidelines;
- Buildings 6 and 7 - the podium area will only partially meet BS8233 guidelines;
- Buildings 7 and 8 - the podium area behind will only partially meet BS8233 guidelines;
- Buildings 8 and 9 - the podium area between will exceed the BS8233 guidelines;
- Building 10 - only the west side will meet the BS8233 guideline levels;
- Building 11 - the south and west side of building will exceed the BS8233 guidelines;
- Building 12 will exceed BS8233 guidelines, only the south side will comply;
  
- The central area will not meet the BS8233 guidelines, with the exception of a small area;

DEFRA noise mapping ([noisemapping.defra.gov.uk](http://noisemapping.defra.gov.uk)) confirms the above, and shows that noise levels from roads and land immediately adjacent to the A40 are high, regularly in excess of 75db, and frequently exceeding 100db.

Section 4.1.3 of the Noise assessment appears to be flawed and should be reexamined. It states that policy guidance given in the Planning Practice Guidance (PPG) for assessing impact of noise on patterns of behaviour, quality of life, and the character of the area should not be applied (and

therefore hasn't been). On the basis that the site is currently empty, residents would be moving into an existing situation, and behaviour is therefore already set in terms of impact and effect. Therefore the consultant ignored any impact or behavioural change the proposed development itself may have. This is an obtuse interpretation of planning guidance. Fully applying the criteria would most probably result in the site being categorised at the Significant Observed Adverse Effect Level (SOAEL), which requires additional planning considerations be taken into account. At this level, amenity space can be considered unusable, and is the level above which significant adverse effects on health and quality of life can occur.

The Noise assessment asserts that noise level breaches are acceptable because residents have access to quieter green spaces within a "5min walk" of the site - namely Elephant Park. As we highlighted to the LBH planning department earlier this year, this is misleading because this park suffers similar noise conditions, and access requires negotiation of busy junctions.

#### Local Transport Network

- The Mayor's Climate Change Mitigation and Energy Strategy sets out the Mayor's vision of London in 2025 as 'the greenest big city in the world, with a thriving low carbon economy', and, focusing specifically on transport, 'London's transport network will be well on the road to zero emissions', also reflected within the MTS13. With this in mind, Hillingdon has completed its own Climate Change Strategy, and its Sustainable Community Strategy prioritises 'Protecting and enhancing the environment' as one of its six broader goals. This includes the objective to 'mitigate and adapt to climate change, reducing emissions across the borough'. This objective is also a feature of the West London Sub-Regional Transport Plan, and has been retained in the LIP. Of the total emissions for Hillingdon, 51% is from ground-based transport - 6.2 tonnes per capita. This is the highest percentage and per capita figure for all London boroughs. AM and PM peak delays show that Hillingdon has the 7th highest AM peak delay of all London boroughs and the 10th highest PM peak delay. Of the 30 identified hotspots, nine locations are considered high priority (as a result of LBH and TfL assessment) and are to be considered as part of the plan to reduce congestion and smooth traffic flow. Eight of the nine locations are on highway routes maintained by Hillingdon, including the A437 Long Lane/A40 Freezeland Way junction - the site location. Congestion is now so heavy in the immediate and surrounding area that a reasonable argument, on public health and quality of life grounds, is that any sizeable development should be postponed until TfL has taken action to reduce it.

- The proposal suggests that "associated highways infrastructure" would be redesigned, but no details have been given.

#### Conservation and Heritage assets

- The Ecological and Biodiversity survey states that MAGIC records a Priority Habitat within the site boundary, supporting nesting birds, and potentially bats, reptiles, invertebrates and hedgehogs. The site also lies within the Impact Risk Zone for two SSSI's (Frays Farm Meadows and Denham Lock Wood). To date, there has been no further elaboration of these implications, by either the Borough Planning Department or the applicant. The status and scheduling of the required surveys is unclear; these surveys can only be undertaken between March and September (for bat scoping May-September) before final approval is given.

- As noted in the opening summary, tree and vegetation clearance at the centre of the site which included a TPO marked area was undertaken this summer without providing the Council with advance notice (5 days notice should have been provided)

- Under the current proposal, approximately 20 grade A&B trees and one TPO'd Oak will be removed, in addition to those removed in the summer clearance. These trees, especially those with TPO, should be retained in the design.

· Consultation with English Heritage (now Historic England), has highlighted the lack of archaeological baseline data for the area, and that the archaeological resource of the area has been 'severely underestimated'. The proximity of the site to medieval activity in Ickenham and the results of the Harefield to Southall Gas Pipeline investigations, which revealed prehistoric, Roman, medieval and post-medieval features and artefacts, implies a potential for previously unrecorded archaeological deposits within the site boundary. English Heritage provided a further update in 2011 highlighting again the potential for archaeology within the area of the site, and providing further details of the gas pipeline investigations, which identified evidence of late Iron Age / Roman period settlement activity, agricultural land-use and possible ritual sites within 700m of the proposed development site. English Heritage also stressed that the site is surrounded by areas which contain archaeological evidence of land-use and activity dating from the Iron Age through to the medieval period, and therefore considered there to be a reasonable potential for archaeological activity within the site. Section 1.4.7 of the heritage asset survey confirmed that evaluation trenches would be required (because of recent archaeological discoveries in the surrounding area); although judgement will be required on the scope, position and number of trenches. Policy HE1: Heritage The Council will: conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and archaeologically significant areas, including Archaeological Priority Zones and Areas. To date there has been no confirmation of when these surveys will take place, and this should be a condition prior to any works taking place.

In conclusion, OFRA strongly objects to this proposal because of its height and density, and the overwhelming effects of over 1000 more residents on already-overstretched local health and education amenities.

Whilst we all agree that this site (and site B across Long Lane) needs to be re-developed soon, this cannot be at such a heavy cost to the quality of life of existing residents. For the scheme to harmonise with the local environment, the overall design height needs to be reduced to a maximum of 4-5 storeys, and roofs and uppermost floors should be pitched, recessed or have dormer elements introduced to soften the impact. These recommendations have already been made by independent peer reviews for previous designs, and could help to alleviate many of our residents' concerns.

#### OAK FARM ADDITIONAL COMMENTS (JAN 2020)

Having reviewed the Visual Impact Addendum (TVIA) supplied by the developer, logged 23 December 2019, and the earlier Transport Assessment Addendum, OFRA wishes to make the following additional comments:

Overall, the TVIA supports our belief that the proposed development is excessive in height, density and massing, and will have a detrimental impact on our local environment, its character and local amenities and infrastructure.

The TVIA clearly shows that the proposal remains, in scale and style, a design that fails to harmonise with its local environment and confirms its dominance over the immediate surroundings - as well as from a distance - to the point where it will detrimentally change the established prevailing character of the area. It also ignores planning regulations designed to ensure that any development remains in keeping with its locality.

#### Detail -TVIA 23 December (Wire documents)

· The TVIA demonstrates that the proposal ignores London Plan Policies stating that Development Design should respond to the local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the local building forms and proportions.

- TVIA viewpoints 3B, 4C now clearly show that the scale-up at the Circus will alter the prevailing characteristics, while viewpoints 5C, 6, 7, 9, 13, 15 show the design dwarfing and dominating both its immediate surroundings, and the wider locality. The current unbroken tree line shown in the 5C panorama (and from this position, visible in all directions) will be lost, with greenbelt and horizon views severely compromised.

The proposed design would alter the character of the semi-rural locality, dominate the local amenity, and compromise views from historic and open-land sites such as Ickenham Manor.

- The height and density of the development has increased from the previous proposals of 2017-18. The Townscape assessment made then, acknowledged that this scheme would 4266/APP/2019/3088 - "Master Brewer site" - OFRA additional objections, have a High Adverse Effect, change the existing roofline of the street and the scale of the streetscape at Long Lane, Freezeland Way and Hillingdon Circus.

- The current BMD assessment - based on the vista3d visuals - that the design would overall have a minor adverse impact on its local area, is purely technical and not credible, given that the visuals supplied, and the contradictory assessments made, were based on previous designs whose height and scale were smaller.

- We wish to re-state that local buildings are almost exclusively two-three storeys high and of suburban Metro style, interspaced with older village centres.

The southern side of Hillingdon Circus itself is largely unchanged in design since its construction nearly a century ago. As noted above, views from Hillingdon station and other vantage points present an unbroken tree line in all directions. At heights of eight, nine and eleven floors the proposed development would irrevocably damage this setting and views. Consultants have previously stated (at proposed heights of 'only' eight and nine floors) that without significant reduction in height and softening of style, the buildings will always present a scale and appearance that would negatively impact and not be in keeping with the local environment.

#### Traffic Assessment Addendum - 9 December 2019

The TA Addendum shows traffic increases over the 2017 data at three key problem sites.

- These are the sites that will be most heavily and immediately impacted by traffic entering and exiting the site. Even proportionately small traffic increases will have a heavy knock-on effect in peak hours, particularly given the current layout of the road network and the Circus itself.

- Overall increases are stated as insignificant and small but total between 700-800 vehicles per day at each of these sites over the two-year period. At this rate of increase, Mayoral Healthy Streets targets are unobtainable.

- The TA Addendum notes that problems were experienced with the ATCs in week 2 (4th-10th October 2019), therefore only week 1 data (27th September - 3rd October 2019) has been reviewed. But no explanation has been given as to the potential impact of these problems on the data or conclusions.

- Sites 4 and 5 are almost entirely dependent on traffic flows from the A40, for which no corresponding data has been supplied.

- The lower journey times shown by GPS traffic data on 5 of the 6 routes does not reflect local experience and may have been affected by the use of amended and shorter staggered measurement points to compare data.

- The data at site 7, showing a significant decrease in journeys, does not correlate with the increases in journeys at sites 1, 2, and 3 - into which it is the main feed and in close proximity.

This decrease in number of journeys does not reflect the daily journey experience of our residents.

- Figure 7: AM peak - Camera 1: 08:05 (2017 vs 2019) on page 23 presents a scene that is completely unrecognisable to a regular Long Lane road user, who would not recognise the pictured volume of traffic as being representative of their daily experience. We would ask if further footage could be obtained.

Long Lane traffic from Hillingdon Station does not regularly clear the lights as suggested.

Figure 13 (page 29) is more representative of average daily conditions (with the exception of traffic approaching Hillingdon Station which is shown as considerable lighter than usually experienced).

- Similarly, traffic approaching from Freezeland Way (page 29) very rarely clears the junction in one signal cycle at peak hours, unless approaching traffic from the A40 is impeded.

Conditions on the A40 have not been referenced.

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Finally, as noted in our main objection last year, the assessment against the Mayors Healthy Street Indicators (Transport Assessment sections 4.6 and 4.7) on similar routing, confirms vehicle dominance on surrounding approaches to the site, with traffic frequently at a standstill.

In conclusion, we consider that the additional information presented at the end of 2019 merely reinforces our original concerns and objections.

#### ICKENHAM RESIDENTS ASSOCIATION

On behalf of the residents of Ickenham, we object most strongly to this inappropriate development proposal at the former Master Brewer site.

We are making our initial objection now, despite not having received additional information and drawings requested at our meeting with London Borough of Hillingdon re this proposal. In addition, our objection on traffic grounds will need to follow as the appendices in the planning documents are incomplete.

This application represents a proposal to squeeze as many flats onto the site as possible. Without the constraints of the RAF Northolt flightpath, how many storeys would have been proposed? 20? 30? These are tiny boxes in the sky, not the homes that local people strive for. Most worryingly, the excessive density and lack of amenity space seriously risk the development creating a future slum.

#### Visual Impact

This proposal is totally out of character with the surrounding area in relation to its size, bulking, mass and design. It would be incongruous placed alongside all other buildings in the immediate area, and completely alter the skyline. This size, scale and bulking of the proposal is more akin to a central London site, not a 'Local Centre' as defined in the UDP (Saved Policies). At a maximum height of eleven storeys it is higher than most of the flats and Offices in Uxbridge, an area designated a Major Town Centre.

The Master Brewer Site sits adjacent to important views from immediately adjacent, and distant, views of Green Belt land, is adjacent to a Local Conservation Area, and nationally listed properties, within the 1 Kilometre radius. The existing buildings in the more immediate vicinity of the development site are mostly 2-3 storey shops/flats built in a clearly residential style and 2 storey houses.



The Development will be the first buildings to be seen on arriving in Hillingdon from the west on the M40/A40 roads transforming from open country side views to a brick collection of monolithic, 5 to 11 storeys, up to 30m, tall massive blocks of flats before proceeding back to open country again on the A40 past Northolt Airfield on one side and open fields on the other.

At a meeting with the developers, it was argued that, as the tallest buildings were to be built into the embankment of Long Lane / Hillingdon Station, the high-rise impact would be mitigated. However, as our experience at the West Ruislip Air Base proved, the embankment of the hill provided little or no mitigation to the height at all and demonstrated the overbearing and oppressive effect such developments have on the street scene.

Previous attempts to build on both this site and the Ruston Bucyrus site opposite have either been withdrawn (Ikea) or restricted in height. The previously approved Tesco application with a Hotel block on the corner of the Master Brewer site was restricted/reduced following objections, to a maximum of 6 storeys".

Item 1 for refusal in the Officers report stated that :-

"The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt and would mar the skyline"

The major difference between this application and the previous, in relation to the issues above is that THIS APPLICATION IS EVEN BIGGER and we feel the Officers report has not in any way been mitigated.

See attached photographs and viewpoints regarding Visual Impact.(New MB Collage Nov 2019)

Community facilities: The development of the Master Brewer site offers an excellent opportunity to establish new much needed community facilities in the area. A community centre and/or a pre-school would satisfy obvious local needs. The applicant seems to have not considered any of these matters.

Gated communities: Several recreational spaces within the proposed development seem to be 'gated communities'. While we understand the desire to ensure that the development is safe, there is no impediment to securing this outcome by sensible design. Gating parts of the development will result in segregation. We want the new development to form part of the existing community. A gated community risks creating a 'them and us' mentality.

Access to green space: Clear assurances were given to the Residents Association by the developers that access to a new green Belt park would be included in proposals. They insisted that an agreement with adjoining landowners had been secured. We view the relationship between the development site and the adjoining green space as an important design consideration and are hugely disappointed that the developers have failed to deliver their commitments on this matter. Furthermore we feel that the developers have acted disingenuously by using images of open access from the site to the green Belt area on their design and access statement. It seems that no access has been agreed. No new park is planned. These are broken promises.

Ambiguity on green technology: The waffle provided in the application on green energy is extensive. There seem to be no clear aims or targets, just 'ambitions' which we suspect will be ignored

**Pedestrian Safety:** There is much emphasis in the application to restrict car ownership, by restricting car parking space and increasing cycle spaces. This implies that a large majority of the 1200 to 1500 inhabitants will require pedestrian access and egress to and from this ISLAND SITE by way of pedestrian crossings in order to 'safely' cross the surrounding major carriageways. From previous studies we have carried out, we know how long it takes to traverse these crossings 'legally' and there will be a great temptation to 'take a chance' and cross one of the several MAJOR roads, to access shops, transport or the station. This we believe will constitute a major safety hazard. We know already the serious limitations on traffic flows and congestion at the Hillingdon Circus junction and ANY increase in the meagre timings for pedestrians will seriously impact further on such traffic.

**Recycling facilities:** The application seems to fail completely to recognise the opportunity to install a sensible system to allow residents to recycle. Recycling rates across flatted developments in Hillingdon are consistently low...the traditional system of providing communal bins at ground level has been abandoned in many areas of the borough, leaving residents without 'curb side' options. All over London new developments are implementing modern systems to address these sorts of issues, but again, this proposal has failed to recognise local issues

**"Series of tall buildings":** The only suitable areas for tall buildings are Uxbridge and Hayes - clearly unsuitable in this location.

**Design:** we were impressed by the contextual analysis of the local built environment character. We were not impressed by the way this analysis was represented in the design. We found only very limited evidence of this, with some pointy roofs on some of the blocks that back onto the A40. The focal point building on the corner of the Circus lacks visual interest and the arched design for the non-residential units seems completely out of context for the area. The nearest commercial railway arches are at Ruislip Gardens, maybe there was some confusion with the 'gardens' reference? The design seems to lack permeability and character. It is not clear how residents would access the station, and it is not clear whether improvements to the pedestrian access to the existing shops would be improved.

To deliver residential densities above those set out in the planning policy for this site, we would expect to see a genuinely outstanding design. The proposed design leads on creating a 'garden community' with green infrastructure flooding in to the development from adjoining green space. Even if this were true, the various other issues with the proposed scheme would provide sufficient grounds for refusal. But this development does not seamlessly flow into a new park. Land ownership and access issues are not addressed. No funding to create or manage a park is mentioned. 'Hillingdon Gardens' is actually 'Hillingdon Towers'.

We ask the developers to go back to the drawing board. They confirmed to us that they were aware of the community masterplan that several local groups pulled together as part of the emerging Ickenham Neighbourhood Plan. We suggest they start with that document and engage sensibly and honestly with local people and a sensible compromise can be found.

#### Density of the proposed development

The application site has an area of 2.48 hectares and a PTAL of 2-3. There are two site categories in the Local Plan relating to PTAL 2-3 sites:

1. Other Town Centres
2. Residential Areas with suburban character within 800m of a town centre

The site in question is not a town centre nor within 800m of a town centre. However it can be described as having a suburban character being opposite the row of two-storey houses in Freezeland Way and close to the suburban style shopping parade of Hillingdon Circus. Therefore this is the most appropriate category which has a density recommendation of 50 -110 units per hectare for a development of mostly flats or 124 to 273 units for the whole site. This is consistent

with the Site Allocation of 250 units for this site (but including the extra strip of land adjacent to the site next to Freezeland Way ie 3.3 hectares or 76 units per hectare) in the Local Plan Part 2. However the proposed number of units is 514 units, around twice the maximum appropriate density for the site. Even if the site were to be considered a town centre (which it is not nor would it be recognised as such in the Local Plan) the maximum would be 421 units.

It should further be noted that this is a site designated for residential-led mixed use. The proposal has a derisory 2% of the area reserved for uses other than residential. Were a more reasonable minimum of 10% allocated to other uses, then the maximum of 273 residential units would be reduced to 245, again wholly in keeping with the site allocation.

If the proposed development kept to this reasonable maximum of 250 residential units it would enable the maximum height of the buildings to be reduced to 5 storeys rather than the 11 storeys proposed. In the Local Plan the site is not considered suitable for high rise buildings. Therefore the application should be rejected on grounds of over-development.

### Traffic

To repeat our concerns - it is clear that a development of this magnitude would generate considerable traffic movements in a junction that is already frequently at capacity.

The proposal still does not show (through lack of traffic simulation evaluation) that it complies with UDP AM7, as follows:

UDP - am7 the Local Planning Authority will consider whether the traffic generated by proposed developments is acceptable in terms of the capacity and functions of existing and committed principal roads only, and will wholly discount any potential which local distributor and access roads may have for carrying through traffic.

The local planning authority will not grant permission for developments whose traffic generation is likely to:

(i) unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network; London Borough of Hillingdon UDP Saved Policies September 2007 (Published Version) 252

### Trip Generation

In the initial proposal the following was stated.

Trip generation (6.2.1) is given to suggest how many extra car (etc.) journeys will be made. This is given in Appendix H. Actually, it appears to be given in a Trip Generation document (Part-6), page 2. Three sites are given as the basis for trip generation using TRAVL. This is due to the following request by TfL as commented in 1.2.1.

"1.2.1 Following the Transport for London (TfL) pre-application meeting held 23rd February 2017, TfL requested a further review of the trip generation methodology is undertaken, specifically in relation to reviewing the availability of newer survey sites. The following comment was received from TfL in the formal TfL pre-application advice letter:

Person trip rates have been obtained by selecting three sites from the TRICS database. Although the resultant trip rate looks reasonable, TfL requests that the database is interrogated further for newer comparable surveys. Data from the 2011 census should be used to derive residential mode share, using the output area. Public transport trips must be broken down by mode and direction."

· There is no justification as to which three sites were taken. The selected set could have been selected with significant bias. This would skew the results in the applicant's favour.

In the new version the following is stated concerning the TRICS site selection (5.2.4).

"These sites, though not directly comparable with the proposed development with regards to number of dwellings or parking ratio, are recently built developments in similar outer London locations that are considered representative of the forthcoming scheme."

This basically says the TRICS data and conclusions made from these are worthless (e.g. the rest of the discussion (5.3.2) onwards). It is highly likely these were selected to give the best outcomes regardless of actual reality.

#### Vehicular Trip Distribution

Again, from the previous objection

- In 6.5.1 it is mentioned that a trip distribution and assignment methodology has been agreed with TfL which follows the methodology used in the 2012 Transport Assessment (correspondence in Appendix A (actually Part 6)). It is stated that "for consistency" the same development trip assignment turning proportions identified in that assessment (which were based on turning counts) have been used for this assessment. As such, it is envisaged that 25% of traffic will arrive / depart from the north, 25% from the east, 25% from the south and 25% from the west.
  - This is an arbitrary assignment. It is our experience that an equal 25% split is far from reality. Evidence from a real survey is needed to support these figures.
  - Further observations on additional trip justifications: 6.6.3 mentions the additional traffic from the RAF Uxbridge development. However, there is no real justification for the figures. This is the same with the RAF West Ruislip development (6.6.4) and the Swakeleys School expansion (6.6.5). There appears to be a failure to account for these properly.
  - In 6.6.8 they claim that the above accounts for additional trips and then claim in 6.6.9 that as an office development at HC will not be going forward these will be less. This makes no sense as the above is independent of the office development.
- In this version this is referred to in 6.2.1.

"6.2.1. As part of the Transport Assessment submitted for the 2017 application, extensive highway modelling was undertaken with TfL to assess the impact of the scheme on the highway network. The proposed development has therefore been compared against the 2017 scheme to assess if further traffic modelling is required."

This fails to address the above comments. Further

"As shown in Table 6-1, when compared with the 2017 scheme, the vehicular trip generation associated with the proposed scheme reduces marginally during both the AM and PM peak hours. Based on this, it is considered that the current scheme proposals would have a marginal benefit in terms of highway impact during peak hours when compared with the 2017 scheme. It is therefore considered that the extensive traffic impact assessment work that was undertaken during 2017 and 2018 in connection with the previous scheme and reviewed in detail by TfL remains valid for the new scheme, and therefore no additional traffic impact assessment work is required in connection with the proposed scheme. The Traffic Modelling Addendum which outlines the impact assessment is contained at Appendix L, whilst a Hillingdon Circus Signal Optimisation note is contained at Appendix M."

THERE ARE NO APPENDICES L AND M !!! We find it extremely concerning that these are not included. Perhaps these are so weak that they have been intentionally hidden. As you can see from the note below there was a promise to share the results of the traffic modelling - this has NOT BEEN DONE.

## LINSIG/VISSIM Assessment (section from previous proposal)

· In 8.1.1-3, it is stated that "The impact of the Proposed Development on the surrounding road network is currently being assessed using the traffic modelling software LinSig and VISSIM. The modelling assessment work is ongoing with both TfL and LBH, and a separate addendum traffic modelling and impact assessment report will be issued separately once the work has been completed."

· It is impossible and unfair to expect to comment on these models and their results. This Association has traffic simulation experts who understand these models and their assumptions. In the past attempts to model and simulate HC have been extremely poor and misleading. It is therefore not enough to say that these will be done later. Both need to be scrutinised in this process. Observation - This makes it extremely difficult to work on as the models are not complete or reported on.

It is concerning that the VISSIM model only appears to address the manual count peak (on a Thursday am and a Saturday pm). "A VISSIM microsimulation model has been built, calibrated and validated to represent the traffic conditions recorded during the traffic surveys (12th January 2017)." The VISSIM model covers two hours in the AM peak and two hours in the PM peak (8.7.1). There is no sensitivity analysis here. It again seems to assume that output roads never block. It is impossible to tell as the model report is not included as noted above.

### Noise Pollution

The area of the proposed development has already high levels of noise, again due to excessive road traffic usage, particularly the M40 corridor. The worst congestion occurs at peak times morning and evening. Loudness of noise is subjective, but it is accepted that an increase/ decrease of ten decibels corresponds to a doubling / halving in perceived loudness. External noise levels are rarely steady but rise and fall according to activities in the area. It is likely that the existing noise levels combined to that of the proposed development would be above the Council's recommended guide lines. We consider that the activities associated with the proposed development would increase noise levels and cause disturbance to local residents both existing and new. We feel, where both air quality and noise are concerned, the development proposals do not protect amenity levels of either existing local residents or future occupants in the new development.

### Local facilities

Whilst not a specific planning objection, we feel that the already oversubscribed local facilities, such as schools, doctors' surgeries, dentists and so on are simply not going to be able to cope with such a massive influx of population in this location.

Given ALL of the above very detailed and carefully researched areas of concern and objection, we ask the LPA to heavily reject this unwelcome proposal and ask the developer to come back with a proposal more fitting to the local area and with greater concern for our existing environment, and, for those who may choose to live here in the future.

### LONDON UNDERGROUND

No comment

### NATS (SAFEGUARDING)

No safeguarding objections.

### CADENT GAS LTD

There is apparatus identified in the vicinity of your enquiry which may be affected by the activities specified.

## TRANSPORT FOR LONDON TfL Engineering

London Underground Infrastructure Protection has no comment to make on this planning application

## MET POLICE Designing Out Crime Group (DOCG)

I have met the applicant and reviewed the proposal. I have provided him with guidance and advice as to what would be required to achieve Secured By Design accreditation, which is achievable. I request that if approved the following condition is applied to the development: (1) Prior to carrying out above grade works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve full Secured by Design Accreditation. The development shall only be carried out in accordance with the approved details. (2) Prior to the first occupation of each building or part of a building or use, a Secured by Design accreditation shall be obtained for such building or part of such building or use. This will ensure the building has the minimum recommended resilience to crime and anti social behaviour issues that it will face for this area. If further justification is required please contact me again. Regards Rob Palin Design Out Crime Officer Metropolitan Police

## ENVIRONMENT AGENCY

Chased 19/12/19

## NATURAL ENGLAND

Natural England has no comments to make on this application.

## HISTORIC ENGLAND The Greater London Archaeological Advisory Service (GLAAS)

The Greater London Archaeological Advisory Service (GLAAS) provided the following response:

The Greater London Archaeological Advisory Service (GLAAS) archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

The planning application lies in an area of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public

Although this application does not lie within an Archaeological Priority Area, the applicant's archaeological desk-based assessment identifies medium potential for later prehistoric or Roman remains based on recent discoveries in the surrounding area. The site lies on London Clay which has often been considered unattractive to early settlement but these recent discoveries show that, as is found elsewhere in southern/midland England, some settlement expanded onto the claylands in later prehistoric and Roman times. This site could therefore contribute to understanding that process in the hinterland of Londinium. Previous developments on the site are expected to have caused some harm but archaeological remains may survive away from the buildings. The proposed development will involve major groundworks across the site which would likely remove most or all of any surviving remains.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation.

However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

#### Informative

Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

I envisage that the archaeological fieldwork would comprise the following:

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

#### Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

The first stage of the condition would involve trial trenching with further investigation in stage 2 if significant remains are found.

This response only relates to archaeology. You should also consult Historic England's Development Management on statutory matters.

### **Internal Consultees**

#### **PLANNING POLICY**

##### **Principle of Development**

An Inspector's Report has been received on the emerging Local Plan: Part 2 (2019) which confirms that emerging Policy SA 14 is sound and can be adopted in line with the modifications proposed as part of the March to May 2019 consultation. In line with Paragraph 48 of the National Planning Policy Framework (2019), substantial weight may be attached to emerging Policy SA 14.

The principle of redeveloping the site for a new residential led-mixed use scheme is deemed to be consistent with emerging Local Plan: Part 2 (2019) Policy SA 14. The land use classes outlined as flexible commercial space (B1/A1/A3/D1) are consistent with the allocation and their quantum is deemed to be consistent with the site's location within the North Hillingdon Local Centre.

##### **Housing Mix**

The scheme is proposing 514 new homes with the following breakdown by size:

221 (43%) 1 Bedroom Units  
216 (42%) 2 Bedroom Units  
77 (15%) 3 Bedroom Units

Adopted Local Plan: Part 2 (2012) Policy H4 outlines that a mix of housing units of different sizes should be provided in schemes, including a preference for predominantly one and two bedroom developments within town centres.

However, emerging Local Plan: Part 2 (2019) Policy DMH 2 proposes to alter this approach so that new schemes are required to provide the mix of housing units to reflect the Council's latest information on housing need specifically. 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. Applicants proposing residential schemes will be required to demonstrate that this need has been taken into account and provide a mix of housing units on site, in line with emerging Policy DMH 2.

Noting that the scheme is within the North Hillingdon Local Centre, as well as on a site with a PTAL rating of 3 and less than 200m from Hillingdon Tube Station, the application for just 77 (15%) 3 bedroom units is considered to be consistent with Policy H4. However it should be noted that any subsequent applications to reduce this proportion would likely be assessed against a new adopted policy framework and a reduction in family sized accommodation (>3 Bedroom) would not be supported.

##### **Ickenham Neighbourhood Forum (INF)**

The formation of the Ickenham Neighbourhood Forum (INF) was approved by Cabinet on 15th December 2016.

The Council were informed at a meeting on 12th November 2019 that the INF were still interested in



submitting a Neighbourhood Plan and were in the process of preparing a draft for consultation. The Council had not been informed about the publication of a draft Ickenham Neighbourhood Plan at the time of writing (11th February 2020). Therefore there is not a published draft neighbourhood plan that the local planning authority could attach weight to.

The INF was consulted as part of this application. No Comments were received.

## ECOLOGY

I have no objections to the proposed development subject to two pre-commencement conditions and an offsite contribution for land to the east.

The ecological assessment provides an appropriate assessment of the site with regard to most species, although more work is required in relation to bats. The assessment has identified that the site, although a former developed site, has been colonised by a range of habitat types that renders the site of biodiversity value. In particular, the site is likely support a small slow worm population as well as being beneficial for amphibians, invertebrates and mammals. The unused nature of the site has a high quality habitat that connects with the land to the east which is designated as a site of importance for nature conservation (SINC) (Borough Grade 1). In turn this SINC connects further northwards to the highly valuable Ickenham Marshes. The A40 provides a significant barrier for various species including reptiles and amphibians but far less so for winged animals. Consequently, this network is a rich and highly valued ecological corridor in an otherwise urbanised area.

The site also has a series of scattered trees which for the most part appear to have been assessed although it is not clear whether the tree belt to the north has been surveyed which is a concern as a large number of mature trees in this area will be lost to the development. The proposed development will effectively remove the majority of the important wildlife habitat on the site, reduce the opportunities for slow worm (protected species), remove a large amount of trees and ideal invertebrate habitat; ultimately the proposal would result in a net biodiversity and is therefore contrary to policy as presented.

However, the site is allocated for development and previous proposals have secured solutions to the net ecological reduction through works and contributions to the neighbouring land to the east. The only way this development could be policy compliant is for 1) a suitable clearance of the site that manages the ecological value prior to any clearance and 2) a contribution to an offsite solution that allows for translocation of species and mitigation for the onsite impacts.

1 - Suitable approach to clearance and pre-commencement works The site is known to support a population of slow worm which is a protected species under the Wildlife and Countryside Act. No clearance work should start until full plans are in place to manage the species. The ecology assessment states:

A reptile mitigation strategy will be required and implemented prior to development works commencing at the Site. In line with English Nature (2004) guidance and current best practise (Natural England, 2015), the aims of the mitigation strategy must be to:

Protect reptiles from any harm that might arise during the development work;  
Ensure that sufficient quality, quantity and connectivity of habitat is provided to accommodate the existing reptile population;  
Ensure no net loss of local reptile conservation status.

This approach is supported and needs to be secured through the following condition

Condition

Prior to commencement of development, a scheme for the protection of reptiles shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide full details of the likely impacts to reptiles and the proposed measures to secure the protection and conservation of reptiles. The scheme shall demonstrate how reptiles will be accommodated onsite or offsite before, during and after construction as well as proposals for translocation offsite if necessary. No works, including site clearance, must commence until the scheme has been fully agreed and the measures for protection secured and implemented where necessary. The development must then proceed in accordance with the mitigation strategy.

#### Reason

To ensure the protection of reptiles in accordance with EM7 of the Local Plan.

#### Condition

Prior to the commencement of development an updated bat scoping study shall be submitted for the whole site (including the tree belt on the northern part of the site). The study shall include recommendations for any further surveys and submitted to and approved in writing by the Local Planning Authority. If the study recommends further surveys, then these will need to be carried out prior to any clearance work unless agreed otherwise in writing with the Local Planning Authority; the results of the further surveys shall be submitted to and agreed in writing with the Local Planning Authority. The development must proceed in accordance with the studies and surveys and include any recommended mitigation as deemed necessary unless otherwise agreed in writing with the Local Planning Authority.

#### Reason

To secure up to date information on the importance of the site for bats to mitigate any impacts in accordance with EM7 of the Local Plan.

## 2 - Offsite Contribution

The net loss in biodiversity must be offset through a contribution to the Council for works to the Site of Importance of Nature Conservation (Borough Grade 1) to the east. More is known of the site in terms of ecology than the previous approved offsite plans for example in relation to slow worms and the need for further tree planting (air quality, ecology and landscape reasons).

Consequently, for the development to be policy compliant the developer must include a suitable contribution to the offsite plans for landscaping and public park works that cover the ecological mitigation. The sum needs to be discussed and agreed with the applicant having considered the aspirations for the wider park area.

## ENERGY

I have no objections to the proposed development subject to one condition and an offsite contribution. The condition is necessary to secure further details regarding the energy strategy, and the offsite contribution is necessary to make the development policy compliant (i.e. zero carbon).

#### Condition

Prior to above ground works, full details of the low and zero carbon energy technologies as proposed in the energy assessment (Cudd Bentley, JR/5550/17) shall be submitted to and approved in writing by the Local Planning Authority. The details shall include full specifications of the technology and equipment to be used, their location on the site, and how they meet the energy and co2 reduction targets identified in the energy assessment. The details shall also include noise assessments for the air source heat pumps, roof and elevation plans for the PVs (as well as fixing

mechanisms and sunlight assessment), and maintenance schedules for both technologies. Finally the details shall also include proposals to monitor performance of the technology and how this will be reported to the Council on an annual basis. The development must proceed in accordance with the approved details and technology must deliver the agreed CO2 reduction targets.

#### Reason

To ensure the development contributes to a reduction in CO2 in accordance with Policy 5.2 of the London Plan.

In addition, the energy assessment identifies a significant shortfall from the zero carbon target required by the London Plan. The shortfall amounts to 325.75 tCO2. Consequently, the S106 must include a carbon offsite contribution of £586,422, payable to the London Borough of Hillingdon in accordance with policy 5.2e of the London Plan.

### FLOOD RISK TEAM

#### 1 Summary of Comments

While the applicant has submitted a Flood Risk Assessment and Surface Water Management Report to accompany the application, there are aspects that are not acceptable to the Council as Lead Local Flood Authority. These include the calculated greenfield runoff rate and subsequent proposed discharge rate from the site, the location of the proposed discharge form the site and the lack of information about the sustainable reuse of water. Further details on each aspect are provided below.

#### 2 Reason for Refusal (if objecting)

In the absence of an adequate surface water management report, the application has failed to demonstrate that this development incorporates a sustainable method of managing water that controls the risk of flooding elsewhere and promotes the sustainable reuse of water. The proposal is therefore contrary to Policies EM1 and EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), DME1 9 and 10 in emerging Local Plan Part 2 Development Management Policies (with main modifications March 2019), Policies 5.13 and 5.15 of The London Plan (2016), the

National Planning Policy Framework (February 2019) and the Planning Practice Guidance (March 2014).

#### 3 Observations

##### Flood Risk

The site is approximately 2.53 hectares in area and lies in Flood Zone 1. A Flood Risk Assessment (ICIS Design Limited report revision C dated September 2019) has been submitted to support the application.

The Flood Risk Assessment states that there nearest watercourse is the Yeading Brook 650m to the east of the site, however, there is an ordinary watercourse from the pond in Freezeland Covert approximately 320m to the east of the site. This watercourse discharges into the Yeading Brook to the east.

There are parts of the site that are identified to be at low risk of surface water flooding (1% annual exceedance probability to 0.1% annual exceedance probability)

with a small area at medium risk of surface water flooding (3.33% annual exceedance probability to 1% annual exceedance probability), however this is related to changes to ground levels associated with the previous use on the site. This is consistent with the topographic survey contained in the Surface Water Management Report. While the proposed drainage strategy is likely to minimise flooding from this source on the site, the low risk demonstrates the need to consider exceedance flow routes in the drainage strategy.

The submitted Flood Risk Assessment is proportionate to the level of risk on the site and is in line with local, regional and national planning policies.

#### Surface Water Management

A Surface Water Management Report (ICIS Design Limited report revision D Dated September 2019) has been submitted to support the application.

It is welcomed that there is an increased proportion of green infrastructure within the proposed drainage strategy, through the use of rain gardens, swales and green roofs. There are further opportunities to align the landscaping with the surface water drainage network.

The Council has concerns over some fundamental aspects of the proposed drainage strategy and cannot therefore recommend that the application be approved based on the information provided. While the detailed design of certain elements of the drainage system can be secured post-planning by way of a condition, these aspects have the potential to affect the layout of the development and therefore cannot be secured by condition.

#### Discharge Rate

The primary concern is the proposed discharge rate from the development. The Surface Water Management Report has calculated the greenfield rate of runoff to be 11.7l/s using FEH Methods. This is over 3.5 times the initial greenfield rate runoff previously calculated for the site in 2017 using FSR methods (3.17l/s in 2017 report). While previous discussions between Council officers and the applicant recommended the calculation of greenfield runoff rates using FEH methods, the rate was never agreed and was at one stage as high as 12.5l/s. The calculation appears to have used an urban extent factor in calculating QMED is quoted as QMEDurban.

QMED should be calculated without any accounting for the urban extent of the surrounding catchment and should be based on an entirely rural catchment. The information provided in Appendix E suggests that the true greenfield QMED rate is likely to be closer to 7.6l/s than 11.7l/s. The agreed rate or runoff is therefore expected to be lower, which in turn will affect the scale of attenuation required on the site. As a result, there is no guarantee that the quantum of attenuation required can be accommodated within the current site layout.

The applicant has also not included the London Borough of Hillingdon Proforma in either the Flood Risk Assessment or Surface Water Management Report to clearly demonstrate that the proposals meet local, regional and national planning policies.

#### Discharge Location

The proposed drainage strategy is to attenuate surface water flows and create a new connection to the Thames Water surface water sewer in Freezeland Way. As stated in the Surface Water Management Report, a connection to the surface water sewer is lower down the drainage hierarchy than infiltration or a connection to a watercourse.

The Drainage Strategy has considered the SuDS hierarchy and has discounted the potential to drain via infiltration or to a watercourse. While the likelihood to discharge all collected surface water to the ground via infiltration is low, the possibility for partial infiltration should be retained as a consideration to detailed design to maximise the opportunities to reduce the volume of surface water entering the sewer network.

The Surface Water Management Report excluded the potential to connect to a watercourse despite there being the potential to connect to an ordinary watercourse in Freezeland Covert to the east of the site that discharges into the Ickenham Stream/Yeading Brook further east. This could be secured by the creation of an open channel as part of any negotiated green space improvements on the Council owned land to the east of the development. It is advised that discussions are held with

Flood and Water Management Officers alongside Green Spaces colleagues to determine the suitability of this work and the scale of any contribution required.

The current strategy is to discharge collected surface water to the Thames Water surface water sewer in Freezeland Way to the south of the site. There are known surface water flooding issues in the catchment area that drains to this sewer, and previous concerns have been raised regarding a connection from the site into this sewer. As the proposed rate of runoff is greater than that which would be acceptable to Thames Water 5l/s/ha., as well as greater than a rate that would be acceptable to the Council due to discrepancies in the calculation methodology, the proposed strategy is not in line with local planning policies.

#### Water Reuse

The Surface Water Management Report has not adequately considered the potential for water reuse within the site in line with local and regional planning policies. The Sustainability Statement submitted only allows for flow control devices on appliances and does not include any information on rainwater or greywater harvesting. Policy EM1 of the Hillingdon Local Plan Part 1 requires major developments to consider the whole water cycle impact of the proposals, including water consumption. Further, Local Plan Part 2 Policy DME1 10 (G) requires all new development proposals to include the collection and reuse of rainwater. The current proposals are therefore not in line with local planning policy.

#### WASTE TEAM

The proposed bin stores are suitable for the storage and collection of household waste and recycling. Both general waste and recycling will be collected weekly from the development. The application states that collections will happen during off-peak hours but this is not a policy which Hillingdon adopts. Collections may take place any time between 6am and 5pm on weekdays with occasional weekend collections. The site should allocate a suitable area for the storage and collection of bulky waste such as furniture. The plan does not account for the storage of waste arising from the commercial units. The applicant needs to clarify this, ensuring that commercial waste (including that generated by on site staff), is stored and collected separately from household waste.

In response to the above comments further plans and clarification was submitted by the Applicant and the following further response was provided by the Waste Team:

I'm happy with their responses thank you. Please can a condition be placed on the commercial units that a waste management plan must be submitted which ensures that the waste is stored suitably and managed separately to residential waste. Please note that some of the units are further than 10 metres (max acceptable pull distance) from the road and therefore, this may require external bin stores to be built.

I've noticed that a couple of the bin store doors open inwards, this can make it difficult to access the bins and therefore doors usually open outwards. We'll still collect if they open inwards, but worth letting them know as a suggestion to prevent damage etc.

#### HOUSING SERVICES

No comment

#### URBAN DESIGN AND CONSERVATION

The site forms an "island" and is bounded on three sides by roads. Long Lane lies to the west and rises up towards the station; the A40 runs to the immediate north and lies at a lower level than the site and Freezeland Way, a busy slip road off the A40, runs west towards Hillingdon Circus. The site

is separated from the latter by a wide area of rough grass and trees , and to the east is an open green space designated as Green Belt. To the north beyond the A40 there is also an extensive area of Green Belt and this area includes the setting of some important historic sites, such as Ickenham Manor and Swakeleys House. These areas are sensitive in terms of views to and from the site and its hinterland has a strong "Metroland" suburban character, particularly in terms of its layout, and the scale and massing of the surrounding buildings.

The application seeks planning permission to construct a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.

Prior to the submission of this current application a pre-application (4266/PRC/2019/144) request had been made to the council seeking advice on the proposals. This current scheme was submitted at the same time the pre-application advice was provided and therefore the scheme has not taken into consideration or addressed any of the Urban Design concerns or properly considered the setting of heritage assets.

There have been a number of applications for the redevelopment of this site in the past the most relevant being 4266/APP/2014/518 (Mixed use redevelopment comprising the erection of a foodstore, measuring 3,543 sq.m (GIA) (Use Class A1) (inclusive of delivery and back of house areas) with 179 car parking spaces and 32 cycle spaces; 3 retail units totaling 1,037 sq.m (GIA) (Use Class A1 to A5); a 6 storey (plus plant level) 70 bed hotel (Use Class C1), with associated car parking and cycle spaces; together with highways alterations and landscape improvements) and 4266/APP/2014/519 (Erection of 125 residential units (Use Class C3) with 100 car parking spaces and 138 cycle parking spaces and associated highways alterations together with landscape improvements (Outline Application with details of appearance reserved).

The August 2014 scheme that the planning committee resolved to grant planning permission (subject to S106) for a lower rise scheme of 4 to 5 storeys, with a taller focal element of a 6 storey at Hillingdon Circus, is already considered a dense form of development for the site. The spacing between the blocks was more in proportion to the heights, and the relationship to the Green Belt is at the uppermost limits. The proposed 2 to 11 (mainly 5-11) storeys greatly exceeds the height, scale and massing of the 2014 scheme, which is of serious concern as the impact of development is overbearing and incongruent with its townscape surroundings and landscape setting.

The scheme proposes a 315m continuous 'wall' of development along the perimeter to the north and west that wraps around the site from the A40 to Long Lane. This continuous ribbon of development, comprises of the taller buildings of the proposed development, with no 'breaks' in order to maintain the seal against the A40 and Long Lane.

It is noted that the finger form blocks along the northern edge have been connected at the north end and the upper-level connecting units are 5 storeys, to allow for a varied roof line. The heights of the outer buildings vary from 5 to 8 storeys with a single 11 storey building at the north west corner of the site. A 7/8 storey 'entrance' building is located at the south west corner. The inner courtyard buildings are between 4 to 7 storeys in height.

Notwithstanding the variation of roof heights, it is considered that cumulatively, the outer walls of the development would rise up dramatically above the existing buildings on the south side of Hillingdon Circus to the extent that they would appear completely out of scale and overbearing. The presence of the 11 storey tower block, contributes to a development that would completely overwhelm its immediate surroundings and would not respect the suburban grain, height, bulk and massing of the

surrounding well established buildings.

Due to the juxtaposition in scale between the proposed 2 to 11 (predominately 5-11) storeys and existing 2 to 3 storey suburban context, the proposed development will be considered as a series of 'tall buildings'. Policy and the supporting Townscape Study evidence base has clearly identified areas of Uxbridge and Hayes as the only suitable areas for tall buildings within the Borough. This site is not Uxbridge or Hayes. Plus there are prevailing sensitive contextual constraints in the form of green Belt, historic assets and a strong 'Metroland' setting. Therefore, the disproportionate scale of proposed tall development is clearly unsuitable for the proposed location.

In longer distance views the development would break the skyline where at present there are views of Harrow. Its presence would mar the skyline and be intrusive where uninterrupted views are less common and more valued. The existing long unhindered views in this location would now be severely impacted and intruded upon.

The size of the development and its unrelieved northern and western facades, positioned relatively close to the site boundary's and relative to the footpath along Long Lane, compounds the scale of the development and the potential harsh canyon like pedestrian environment at ground level.

The August 2017 refused application 4266/APP/2017/3183 included a small number of TVIA verified views which confirmed the harmful impact of a scheme that was four to nine storeys in height. The new proposals will exacerbate the harm of this previous scheme by introducing building heights of predominantly 5 to 11 storeys in height. It is a concern that the current Townscape & Visual Impact Assessment does not include verified views to show the full impact of the proposals on the surrounding area and there is no evidence to suggest that an assessment was even undertaken prior to the submission of this formal application.

Any redevelopment of the site should be more proportionate to the scale of the local centre, rather than the scale of a metropolitan or regional centre, which the development is clearly seeking to achieve. The existing character and setting of the site is clearly not of this scale, which is further reinforced by the low PTAL 2 to 3 for the area.

The severe jump in scale from suburban to urban is too immediate and lacks any architectural transition to soften the scale change. Therefore the impact is considered to be a brutal and harmful intervention into the prevailing Metroland character area and dominant green Belt landscape setting and the setting of surrounding historic assets such as Ickenham Manor.

An addendum to the TVIA was submitted in December 2019. As a result a further site visit was carried out and the following comments were made by the Urban Design and Conservation Team:

There is a hedgerow / treeline that runs along the southern curtilage boundary of the listed building. Currently there would be glimpse views from the property through the boundary due to the lack of foliage during the winter months. The proposal will therefore have some negative impact on the setting of the grade I listed house. This could be made worse if the foliage was ever to be removed, reduced or thinned out. Ickenham Manor has always had a rural setting and the southerly views from the house and surrounding curtilage help to reinforce this important character as they overlook surrounding farmland which is enclosed with verdant hedge and tree lines. The southerly views from Ickenham Manor would therefore be harmed by the construction of the proposed development which would extend up above the tree line on the horizon. The harm to the setting of the grade I listed building would be considered less than substantial. The impact would be reduced during the spring / summer months when the trees along the southern curtilage assuming they are not removed.

I have also looked at the other views within the TVIA.

With respect to the Ickenham Conservation Area views 10 and 11 demonstrate that the new development would be seen in views looking towards the site. The proposed development would extend up above and visually infill gaps between houses. Although the views of the TVIA are static it would appear that the development would likely to be visible in a number of kinetic views as one moves through the conservation area as well as from the windows of houses and from rear gardens. One of the strong characteristics of the conservation area is the uninterrupted skyline of hipped roofs and the softening effects of street and privately owned trees. The enjoyment of this roofscape is likely to be affected and as a consequence there will be harm to the setting of the conservation area. The harm would be considered less than substantial.

Many of the other views in the TVIA illustrate the developments impact on the townscape and confirm that it would be a discordant and incongruous development within this modest suburban setting of buildings of two and three storeys in height.

The longer distance views also demonstrate harm. In particular views 13 and 15 show the development extending up prominently above the tree line whereas the existing established development of the surrounding area is kept well below the treeline which retains a largely uninterrupted skyline of tree canopies which make a positive contribution to the area.

The proposed development has a coarse grain comprising large flat blocks which are at odds with the surrounding townscape which has a much finer grain of modest 2 and 3 storey houses and shops which create a strong suburban character with open space.

Notwithstanding the objections already raised to the inappropriateness of the development's height, bulk and mass to the suburban character of the area, the layout of the buildings and separation distances between the blocks appear to be acceptable on a scheme of this size but as stated previously would be more appropriate in an urban setting with development of a similar height, bulk and mass rather than this suburban setting adjacent to the green belt.

The proposed roof forms comprise flat roofs with parapets, gable ends, mansard elements and set back storeys to provide visual interest. The parapet roofs and gable ends loosely reflect the established roofscape, albeit on a much larger scale, but the introduction of mansard roofs with sheet cladding would be incongruous. These elements would be particularly prominent given the proposed height of the buildings and would draw undue attention and detract from the area.

Notwithstanding the concerns of the height bulk and mass of the development. The detailed design of the facades (see also comments with respect to materials) is generally considered acceptable and well considered. There are some reservations with respect to the rounded arches to the ground floor of the 'Focal Building' to Hillingdon Circus which does not sit comfortably with the architectural language of the floors above.

The development proposes streets and public spaces that are well planted and incorporate a hierarchy of materials for the hard landscaping with shared surfaces which would be complementary and appropriate for the site.

The proposed construction materials for the majority of the blocks have contrasting brickwork with bands of reconstituted stone to accentuate different parts of the facade and is considered acceptable in principle. This would be dependent on appropriate brick, bonding, mortar and stone being chosen to respect the local palette of materials. There are concerns with the use of a green brick to the Park Pavilions as the visualisations suggest that this would be glazed brick. This could draw undue attention and appear incongruous within this sensitive location close to the green belt and would be in stark contrast to the more traditional palette of materials of the established suburban development in the area.



## Internal Consultees (Additional)

### HIGHWAYS TEAM

#### Site Characteristics and Planning History

This vacant Brownfield site in Ickenham was originally occupied by the Master Brewer (MB) Motel and Public house which consisted of 106 bedrooms, conferencing and restaurant facilities with parking for over 200 vehicles. The site is situated on the north-eastern segment of the major 'Hillingdon Circus' signalised junction and fronts directly onto Freezeland Way. It is bounded by A437 Long Lane (north) and Freezeland Way which is a continuation of the A40 Western Avenue exit slip road.

It is located adjacent to Hillingdon London Underground (LU) train station and is served by TfL bus services, U2, U10, 697 and 698. Additionally the independent 'Oxford Tube' and X90 bus service operating to and from Central London provides a convenient sustainable transport mode. However this level of public transport availability is not fully reflected within the public transport accessibility level (PTAL) rating for the site which equates to 3 and is therefore officially considered as moderate and increases dependency on the ownership and usage of the private motor transport.

In 2014, two planning applications for this site were presented to the Major Applications Planning Committee on 27th August 2014 for decision. One was an outline application for 125 (C3) residential units with a 100 car park spaces (4266/APP/2014/519) whilst the other was full application for a retail (A1) and Hotel (C1) provision with 179/19 car parking spaces respectively (4266/APP/2014/518). The Committee agreed the recommendations for approval for both applications subject to the completion of an extensive Section 106 agreement. However this process was never finalised resulting in both schemes not receiving planning consent.

More recently, on the 19th February 2019 the Majors Planning committee refused an application for 437 residential units with 219 on-plot parking spaces with nominal retail and commercial provision (4266/APP/2017/3183). There were 10 reasons for refusal which included reasons 2 & 3 which cited insufficient on-plot parking provision and excessive traffic generation respectively.

It is now proposed to provide 514 residential units with nominal retail/commercial provisions and a total of 164 on-plot parking spaces consisting of 154 residential, 6 visitor and 4 car club spaces distributed within each of the 8 proposed podium levels and also including on-street locations.

#### Parking Provisions - C3 Residential

The 514 residential unit component of the application consists of the following:-

221 - 1 bedroom flats

216 - 2 bedroom flats

77 - 3 bedroom flats

Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policy states that new development will only be permitted where it is in accordance with the Council's adopted parking standards.

A total of 154 on-plot residential spaces are proposed which equates to a ratio of between 0.3-0.36 spaces per dwelling. They are to be arranged at surface and podium levels central to and across the site.

It is acknowledged that the Greater London Authority (GLA) have accepted a ratio ranging from approximately 0.3-0.36 per flat unit within their pre-application response dated 22nd July 2019. However this unprecedented low parking ratio would normally be considered for areas akin to more sustainable main or 'edge of' town centre locations which are better placed to accommodate such a lower level of provision.

Utilising the Hillingdon saved UDP standard, the recommended maximum quantum would be in the region of 771 spaces and 591 spaces when applying the emerging Local Plan Part 2 standard. However in the spirit of compromise between the regional and local parking standards and LBH advice afforded at the pre-application stages for the aforementioned prior applications including the current iteration, encouraged a 1:1 parking ratio per unit which would equate to 514 spaces. This would assist in limiting undue and detrimental parking displacement onto the local highway network.

The proposal therefore significantly falls short of the adopted UDP and emerging Local Plan Policies which favour a higher parking provision given the site's Outer London borough status and the modal choice challenges this brings for Hillingdon's residents, both incumbent and new occupiers, who need to travel to destinations extraneous to Greater London (GL) by using convenient major road links such as the M4, M25 and A40/M40 corridors. Such travel choice by private motor car is mainly due to the expensive and inconsistent availability of public transport nodal links outside of London. This is reinforced by census data (2011) which indicates that Hillingdon exhibits one of the highest car ownership rates per household in London and a commensurate increase in this trend is anticipated since the collation of census data in 2011. The private motor vehicle would therefore be likely to remain as the main dominant mode of travel choice for many new residents by reason of need and convenience for the foreseeable future.

Notwithstanding the above and as highlighted earlier, the need to encourage sustainable modal travel choice is acknowledged on a local, regional and national level hence in the spirit of compromise between the regional London Plan and local Hillingdon parking standards, an on-plot parking ratio between 0.75-1 space per dwelling in lieu of the proposed average 0.3 per unit ratio would be favoured. This would then equate to approximately 385 - 514 residential spaces instead of the 154 proposed. This compromise is substantively below Hillingdon's maximum adopted standard requirement of a 1.5 per unit ratio which would demand 771 spaces and 591 when considering the emerging Local Plan Part 2 standard.

When contextualising all of the above, a level of on-plot car parking provision for this site between 385 (minimum) and 514 spaces would be considered appropriate and is therefore recommended. As a consequence the proposed total quantum of 164 spaces (including residential, disabled compliant, visitor and car club provisions) is considered unacceptable as there would be a heightened potential for detrimental parking displacement onto the highway network.

Irrespective of the level of on-plot parking, it would be recommended that the site address be made 'Resident Permit Restricted' in order to prevent future occupiers from obtaining parking permits for the local area if and when the adjacent Controlled Parking Zones (CPZ's) encompass the site in future. The applicant has indicated agreement to this mechanism which will help deter excess car ownership/usage from within the site. This would be secured by legal agreement under Section 106 of the Town and Country Planning Act 1990 (T&CPA 1990).

#### Car Club Facility

Car clubs are privately operated 'pool cars' and club members can book a car as little as an hour before use. Bookings can be made for an hour, for 2 to 3 days or longer and is therefore more economic than conventional car hire. Car clubs therefore encourage people to forego private car ownership thus promoting the sustainable transport agenda. Research has shown that car clubs have the potential to replace between 6 to 20 privately owned vehicles within catchment areas consisting of both existing and new housing stock.

To assist toward sustainable modal shift it is proposed to provide 4 car club spaces to serve the location with 3 years free membership to be provided for each dwelling upon first occupation. The provision would be monitored and reviewed on a demand led basis with bay provisions adjusted accordingly if required. This facility is welcomed and would be secured via a S106 legal agreement.

### Electric Vehicle Charging Points (EVCP's)

Based on the proposed site parking quantum, the parking requirement for EVCP's in line with London Plan 2016 (LP 2016) draft Policy T6.1 for this C3 use would equate to 33 EVCPs (20%) for 'active provision' with the remaining spaces (131) acting as 'passive' provision for future activation. These would be monitored and controlled within a parking management strategy (PMS) regime (to be discussed later). This arrangement is considered acceptable within the above context.

### Disabled Parking

It is proposed to provide 16 disabled compliant parking spaces distributed within each podium level and on-street which is in line with the draft London Plan Policy T6.1 which requires 1 space per 3% of dwelling units. Thereafter a demand led approach is applied which is capped at a level of 10% of the total number of residential units. The 'initial' provision is therefore welcomed and considered acceptable in number and layout terms.

### Cycle Parking

In line with draft London Plan standards, there would be a provision of 918 secure and accessible spaces in total for residents and visitors located throughout the site, including within a 'cycle hub,' which is acceptable in format and design layout terms and the quantum conforms to and exceeds Hillingdon's saved UDP standard which would require a figure in the region of approximately 500 spaces.

Notwithstanding the above, the indicated provision of 918 is considered excessive as it is a demonstrated fact that the vast majority of larger new developments in Hillingdon do not fully utilise cycle provisions which results in large numbers of spaces remaining empty and occupying areas which could be better used for amenity or other more useful purposes. A reversion toward the saved UDP standard would therefore be considered more prudent in this regard. The underuse can also be explained by the borough's Outer London status and the travel challenges that this brings for residents who are therefore reliant, more so, on the private motor car in lieu of cycling as confirmed by census data (2011) which indicates that Hillingdon exhibits one of the highest car ownership rates per household in London.

### Motorcycle/Scooter (M/S) Parking

The Council's UDP Saved Policy standard requires that 1 motorcycle/scooter parking space per 20 parking spaces is to be provided within new development.

Consequently there should be 8 such spaces provided in total for the site as a whole. 13 suitably located areas are proposed which therefore exceeds the standard and is therefore welcomed.

### Parking Provisions - Flexible Commercial Units (Use Class B1/A1/A3/D1)

The applicant is proposing a zero parking provision for the flexible commercial elements which would total an overall scale of 1214 sqm GIFA. In accord with the LBH saved UDP standard, a quantum of up to 24 spaces (or 48 spaces in line with the emerging Local Plan Part 2 Development Plan) would normally be required for this level of scale with a suitably apportioned GIFA. It is reasoned that to justify a 'car free' status for the use, demand will be very local to the development and public transport/pedestrian based which includes patronage by new occupiers of the address. Hence car borne demand is predicted to be relatively low to non-existent. On this premise there would be no parking provision for the 'commercial' component.

This would in theory leave 6 generic visitor spaces which are dedicated more so to visitors affiliated to residents. However if vacant could be part utilised by 'commercial' patrons as and when. Clearly this would need to be managed accordingly hence the practical 'day to day' operation of the bays would be controlled under the proposed parking management strategy (PMS - to be discussed later).

As is it unlikely that the commercial element would attract measurable extraneous custom due to its insular siting within the development which inherently discourages pass-by or pass-through traffic, the absence of parking provision for this element is considered appropriate given this context.

#### Cycle Parking

In line with draft London Plan standards, there would be a provision of 8 long stay & 32 short stay spaces for the 'flexible' B1/A1/A3/B1 uses. This totals 40 spaces which is considered acceptable albeit marginally below Hillingdon's minimum cycle parking standard. All are presented secure and accessible in design layout terms and are conveniently located throughout the site for residents and visitors to use.

#### Parking Management/Allocation Strategy (PMS)

On the premise of best controlling the mixed use profile of parking usage within the site which includes new residential and flexible commercial provisions, it is considered that the application of PMS is a key tool which helps to ensure an unhindered and functional operation for all the parking uses within the site envelope. This involves creating an internal site management regime that would enforce and oversee overall parking control on a site wide basis thus ensuring the harmonious and mutual coexistence/interplay of parking bay allocations for new residents and their visitors including any minimal demand imposed by the commercial component of the development. The PMS can be supported by enforcement structures which encourage the correct use of parking places which assists in ensuring that parking demand and allocation is properly managed. The PMS should also set out the methodology behind the allocation/control of parking places for the dominant residential and less so commercial element.

The applicant has indicated that an internal residents parking scheme would be the enforcement tool that would be applied to control and regulate the on-site parking mix. They also state that 'key fob' operation could be applied as a method of entry into both the main surface level and podium car parks within the site envelope which would then be managed accordingly. The site area would potentially be separated into several parking zones which will require the purchase of a parking permit by new residents. The scheme would involve a private parking enforcement company who would administer the scheme and monitoring would be undertaken at intervals of six months for two years after scheme implementation in order to determine the effectiveness and consequences of the enforcement regime. Such monitoring would be applied within (and external to) the site in order to decipher whether any detrimental displacement impacts have been inflicted internally or specifically on surrounding public highway.

The extent of surrounding highway road network to be monitored at the aforementioned intervals, is to be secured by suitable planning condition with a contingency sum of £20,000 to be secured via legal agreement which would be used by the Council if, as a result of the findings (or separate council officer observations), highway mitigation is required. The sum would be returnable if, after the two year monitoring regime, there is no identified requirement for mitigation. The PMS would be secured by planning condition.

#### Traffic Impact Assessment (TIA) Methodology

Two 'industry recognised' traffic assessment tools were applied to the recently refused 2017 application (19th February 2019) for 437 units and have also been utilised to analyse the local and wider impacts of this current proposal. In accord with TfL advice, fresh traffic surveys have been undertaken in September 2019 in order to determine whether there has been any measurable change in base-line traffic flows which may require a re-run of the modelling process (to be discussed later in this appraisal). The findings suggest that an overall reduction in traffic flows in the area which has negated a re-modelled exercise. Using the 2017 surveyed and modelling data, analysis has been centred on the 'Hillingdon Circus' junction and combined with extant committed developments in the relative locality. LinSig (traffic signal analysis) & VISSIM (traffic flow simulation) modelling have therefore been applied for this purpose. In order to apply these tools, certain

assumptions and parameters have been established and they are compiled below. The methodology and outcomes have been independently validated against the 2017 highway network, observed demand and network performance and are supported by Transport for London (TfL).

### Traffic Growth

Comparative and thorough local traffic surveys were undertaken in 2017 & then in 2019. The former exercise indicates a similarity with previous surveys dating back to 2010 undertaken for a prior application for the site whilst this year's surveys appear to indicate a measurable fall in traffic activity. In general terms indicative traffic growth in many areas of London has in fact plateaued over recent years with a maximum growth potential, at certain locations, not exceeding 1% with many areas exhibiting no notable growth whatsoever. In 2017 the applicant has therefore assumed zero growth to this point whilst now in 2019 suggests, for an example, an hourly reduction in traffic flows ranging from 11% in the am peak and 9% in the pm peak hour at the Hillingdon Circus signalled junction. This apparent drop in flows is questioned as the results significantly reverse the growth trend which does correspond with 'year on' increases exhibited elsewhere in Greater London.

An explanation with regard to this apparent drop in surveyed activity is possibly down to certain influencing factors in that traffic surveys can display considerable variance from 'day to day' as extraneous factors such as congestion, drivers tolerance to delays/congestion, inclement/adverse weather conditions, sustainable modal shift, origin and destination of trips i.e. linked trips etc affect representative data. Such parameters will also change dynamically from day to day which further disfavours an accurate representation of recorded traffic flows.

Notwithstanding this point, for robustness the applicant has utilised the higher 2017 'zero growth' figures as for the previous application. As was the case then, it is considered that, at the very least, a TEMPRO growth factor which is the industry recognised method of analysing 'year on year' traffic growth in order to ascertain best-guess estimates of future travel demand should have been applied to provide a more accurate TIA.

### Committed Development

The 3 main substantive development sites (with a more recent smaller 2019 consent for 36 residential units - see D below) which may, in conjunction with the proposed new development, impact cumulatively on the highway network capacity were included within the modelling exercise for previously submitted application for 437 units and are listed as follows:-

- A) RAF Uxbridge - Residential-led mixed use.
- B) Housing and Retirement village in West Ruislip.
- C) Abbotsfield & Swakeleys School - Merger & Expansion.
- D) Former dairy depot, 297 Long Lane - Residential use

Developments of a lesser scale were omitted from the analysis due to their comparatively de-minimis predicted highway impacts. Irrespective of their exclusion, there is an indication that the proposal in combination with committed development impacts will already exceed the 'acceptable' threshold of traffic increase (see latter 'Vehicular Trip Generation' sub-heading) when the above sites are taken into account.

### Traffic Modelling Outcomes

In traffic capacity terms, the current baseline scenario indicates that the Hillingdon Circus signalled junction operates at and above capacity, both in the am and pm peaks thus creating undue traffic queuing and resultant congestion at the junction and surrounding road network. The proposal combined with the aforementioned committed developments would clearly exacerbate this position creating a scenario whereby the junction could potentially be inflicted with traffic levels well above

operational capacity resulting in greater vehicle queue lengths and associated delays which understandably raises concern.

Such concern has already been expressed by local residents and the representative Ickenham Residents' Association. It is noted that the impacts are significantly lessened when the 'Development only' scenario is considered in isolation however the Council is duty bound to take a holistic approach by considering cumulative impacts linked to committed developments in the locality. The following chapters explore the aspect of actual 'real world end game' traffic impacts in more detail and the possible highway interventions that may be considered to improve the local road and pedestrian network for current and reasonable future demands.

It is noted that since the modelling exercise has been undertaken in 2017 for the refused application for 437 residential units there have been further developments with regard to up and coming HS2 Ltd related construction activities to the north of the site and specifically related to new tunnel portal construction adjacent to Ruislip Golf course in Ickenham Road. These works would result in Hillingdon Circus being utilised as part of the main A40 Haulage Route hence imposing additional traffic burden. At the time of the original modelling exercise, no firm detail was available regarding likely HGV movements generated by the construction however some evidence has been produced by the applicant which indicates that during months of construction commencing from autumn 2020, approximately 18 HGV's would traverse through Hillingdon circus on a daily basis with an imposition of 3 vehicles during the am & pm peak hours. Although it is anticipated that there will be peaks and troughs in HS2 linked construction activities, the official estimation by HS2 Ltd of, for example, HGV activity linked only to the new portal at the Ruislip Golf course located further north of the MB site in Ickenham Road is officially anticipated at 120-140 daily two-way trips within HS2's 'main works' Local Traffic Management Plan. A high proportion of these vehicles would route through Hillingdon Circus and as HS2 Ltd cannot guarantee avoidance of peak traffic periods this would infer a significant under-estimation by the applicant. General HS2 Ltd activity generated by other work sites in the borough would also add measurable burden to the junction during and outside of peak traffic periods well into the second half of the next decade. It is therefore considered that the 'real world' level of imposition would add significant traffic burden which is especially concerning in the light of the signalled junction running at/beyond working capacity during peaks at present. The applicant has not factored this aspect into their analysis on the premise of identified traffic reduction measured in 2019 which would therefore absorb HS2 Ltd activity. As explained within the 'Traffic Growth' chapter, it is not considered as an acceptable course of analysis.

#### Vehicular Trip Distribution

As per the previously refused application for 437 units, it is assumed that an even (25%) vehicle trip distribution forecast for site arrivals and departures has been applied to all of the north, east, south and westerly arms of the 'Hillingdon Circus' signalised junction within the modelling exercise. This assumption has previously raised some concern from the Ickenham Residents' Association who cite this percentage assumption to be an 'arbitrary assignment' and unrealistic.

As Members are aware, percentage trip assignment assumptions (based on the total predicted traffic generation) are required for traffic modelling purposes and as such are considered more as predictions rather than 100% accurate representations of actual generated trip movements post development. This 'built-in inaccuracy' is notably due to the difficulty in predicting traffic assignment and distribution which depends on a driver's premeditated decision to drive in the first instance and many other extraneous factors such as congestion, drivers tolerance to delays/congestion, inclement/adverse weather conditions, sustainable modal shift, origin and destination of trips i.e. linked trips etc. Such parameters will also change dynamically from day to day which further disfavours accurate trip generation predictions. On this premise and the given configuration of the highway road network, the 25% 'four-way split' percentage assumption/assignment for site arrivals is considered as realistic and therefore acceptable for modelling purposes. In terms of site

departures, a more reflective figure of 33.3% should ideally be applied based on an equal 'three-way split' imposed on the north, south and west junction arms only. This is due to the 'one-way' nature of the westbound flows on the eastern arm of the junction i.e. Freezeland Way which effectively removes the option of eastbound travel on that arm.

Notwithstanding this point, such a percentage variation between site arrivals and departures does not influence the final projections i.e. uplift in traffic flows, to any measurable degree therefore it is considered that the vehicular trip distribution is relatively sound within the context of the inherent unpredictability of dynamic trip assignment as referred to above.

#### Traffic Generation - C3 Residential/Commercial Units (Use Class B1/A1/A3/D1)

Policy AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policy requires the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

A London database of trip generation for different land uses (TRICS) has been applied by the applicant and the combination of the highest level of trips have been chosen to illustrate the maximum likely impact on the local highway network.

It has been suggested that the 514 residential units would result in a two-way traffic generation of approximately 78 vehicle movements @ the AM peak with a figure of 61 for the PM peak. The commercial together with servicing aspects (commercial & residential) are relatively insignificant generators and as a result marginally increase the above predicted figures to 82 & 67 respectively.

It is however considered that the applicant has underestimated both am and pm vehicle trip generation where, on average, peak period residential activity for this scale of development is very likely to exceed 100 two-way vehicular movements hence, where applicable, a higher percentage traffic growth figure would apply as addressed under the next 'Vehicular Trip Generation ' sub-heading below.

It is noted that the above predictions do fully 'factor in' any further potential trip reductions by way of modal shift toward sustainable means of travel resulting from a successful travel plan and PMS strategy discussed elsewhere within this appraisal.

#### Vehicular Trip Generation (based on 2017 survey data)

On the assumption of a development opening year of 2021/22, a future traffic generation forecast of 5 years post development is proposed and this falls within accepted guidance parameters. The relevant traffic flow figures (measured and predicted) related to the proposal are as follows:-

##### A) Total base traffic flows (v/hr) thru main junction:

AM(peak) - 3830

PM(peak) - 3708

##### B) Proposed Development only (v/hr)

AM (peak) - 78 - uplift on total base flows of 2%

PM (peak) - 61 - uplift on total base flows of 2%

##### C) Committed Development only (v/hr)

M (peak) - 244 - uplift on total base flows of 6% \*\*

PM (peak) - 76 - uplift on total base flows 2%

##### D) Proposed & Committed Development only

AM (Peak) Proposed = 78 Committed = 244 Total = 322 uplift on total base flows = 8% \*\*

PM(Peak) Proposed = 61 Committed = 76 Total = 137 uplift on total base flows = 4%

**\*\* exceeds IHT 5% threshold**

In traffic impact terms, the acceptability (or otherwise) of a development proposal is summarised within the 2019 National Planning Policy Guidance (NPPG) - Paragraph No. 109 which states "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". This approach has therefore been applied throughout this chapter.

As highlighted previously, it is considered that the applicant has underestimated both am and pm peak vehicle trip generation hence, where applicable, a higher percentage traffic flow growth than depicted in the above table would be expected in reality.

The Chartered Institution of Highways and Transportation (CIHT) (formally IHT) traffic assessment guidelines (circa 1994) trip generation thresholds were traditionally recognised as appropriate guidance which would allow for an informed decision to be made on whether development impacts could be absorbed within existing highway networks with or without highway interventions i.e. mitigations. Threshold triggers of 5 and 10% development traffic uplift were established for congested and other roads respectively to establish whether mitigation measures (if achievable) could enable a proposal to be acceptable on highway grounds if these percentages were exceeded. Although this once ubiquitous method of approach is no longer applied on a widespread basis, it is still considered as a worthwhile measure and guide for gauging the suitability or non-suitability of a proposal on highway traffic generation grounds.

In line with this approach, the 'Development only' predicted uplift on total traffic flows amounts to 2% however table D indicates an overall 8% predicted uplift in the AM peak traffic flows when 'committed developments' are also taken into consideration which notably excludes full imposition by HS2 Ltd construction related activity and any general 'year on year' additional traffic growth. This 'cumulative' figure of 8% greatly exceeds the IHT guideline threshold which, as stated earlier, recommends a figure of up to 5% being an absorbable increase on a congested highway network without measurable detriment and need for mitigation. It is therefore apparent that the Hillingdon Circus signal installation would be overburdened, at peak times, operating at or indeed exceeding practical operational capacity. Further signal optimisation could be sought post-implementation if the proposal receives planning consent however optimisation has taken place in the past hence it is considered that little highway benefit can be achieved by this mechanism at this or any future point with or without redevelopment of the site.

In summary, unless substantive highway mitigation and highway gain can be achieved, the proposal is considered unacceptable on traffic generation grounds. The applicant has indicated willingness in providing some highway enhancement/financial contribution in an attempt to mitigate development impacts mainly focussed on improving the pedestrian environment, public transport facilities together with highway improvements related to improving site access and egress. There are no firm remedies proposed for the specific enhancement of the junction capacity at Hillingdon circus.

Hence although some of the proposed measures are welcomed, it is considered that proposal is still highly likely to have negative impacts upon the public highway. This overall conclusion falls in line with the NPPF paragraph No.109 with specific regard to the appropriateness of refusing development based on the residual cumulative impacts on the road network which, in this case, are considered severe.

The following chapters appraise what has been offered to this authority in terms of mitigation in order to allow the Committee to make an informed decision on the overall proposal.

#### Development Footfall

It is a normal requirement for this scale of residential development to be accompanied by a



Pedestrian Environment Review System (PERS) audit in order to provide an inventory of local pedestrian facilities thereby allowing an informed determination of the suitability of the local highway network to be made in order to cater for the uplift in foot traffic generated by a proposal. The applicant has not provided this audit however a study was previously submitted for the refused 437 unit scheme which indicated 64/49 additional pedestrian movements are predicted for the am & pm peaks respectively. Clearly with the uplift in unit numbers from 437 to 514 this prediction would increase. However the original numbers were considered as a gross underestimation given that the overall proposal could potentially house somewhere in the region of 1000 new residents. Notwithstanding this point, as is the norm, pedestrian footfall would cumulatively increase and be distributed throughout the day and evening periods so clearly any projected footfall uplift, whether it be at peak or any other time of the day, would impinge on the public realm creating additional demand on the public realm i.e. footway and road crossing infrastructure.

When reviewing the locality it is clear there are some physical deficiencies within the existing footway network and pedestrian provisions @ Hillingdon Circus. It is also apparent that there is no one perfect solution which can address all the aspirations and desires the Council has for improving the pedestrian aspect of the public realm together with improving highway capacity at the junction however the scheme proposal furnishes an opportunity for a measure of public realm infrastructure gain which would be secured by legal agreement.

#### Potential Pedestrian Environment & Traffic Enhancements @ Hillingdon Circus

The following appraisal encompasses the main challenges and opportunities related to an enhanced pedestrian environment together with an attempt to improve highway capacity in the form of developer financed enhancements to be secured via legal agreement.

When viewing the 'Hillingdon Circus' signal installation which includes for pedestrian movements, it is clear there are some physical deficiencies within the existing layout. It is also apparent there are competing 'in-tandem' demands between providing pedestrian related enhancement and the need to improve highway capacity. This is predominantly due to the need to balance road capacity and traffic free flow objectives with the existing and necessary pedestrian crossing provisions. The aspect of insufficient 'green time' for pedestrians has been raised by the local community and could be considered for remedy within a future signal optimisation exercise as discussed earlier.

Ideally the carriageways on the approach to the signals would benefit from some widening at certain key junction apertures to enhance road capacity as the junction is already operating at or above capacity during peak periods. There are however some existing constraints which prohibit major change and these include the existing central reservations which incorporate pedestrian facilities i.e. sheep pens on all four arms and the non-existent availability of additional public or 3rd party land which could otherwise allow for road widening.

Notably the pedestrian facilities on all four arms of the junction should be of adequate scale to properly serve their intended function which inherently compromises road capacity by reducing road widths. In short the scale of pedestrian containment within the 'sheep pens' which split the roadway on each arm and provide safe refuge for pedestrians should be of a scale which allows unhindered two-way movement for all pedestrian users.

Conversely any physical adjustment i.e. reduction in width to these 'sheep pens' in order to increase road lane size will therefore be prejudicial to the pedestrian user. This aspect is of particular concern because if this application receives consent the generated footfall will inherently increase thereby adding further demand on the existing crossing infrastructure.

Currently there is one notable 'sheep pen' that is well below recommended width standard and is sited at the junction on the Long Lane (North) arm. It is noted that historically (with reference to previous site planning applications) the Council has encouraged road widening on this particular arm

of the junction. Given the already sub-standard scale of the central 'sheep pen' crossing, such an aspiration could only be achieved by acquisition (dedication) of a slither of land on the far western flank of the proposal site envelope (alongside Long Lane) which would thereby maintain road capacity and provide a larger 'sheep pen'.

Following negotiation with the applicant on this aspect, the planning submission has indicated the creation of a new highway boundary on this western flank of the site envelope which would result in land dedication to the Council. This would assist in achieving an enhanced width of 'sheep pen' with lane realignment and is therefore welcomed. This objective would be secured via a s106 & s38 legal agreements.

The 'sheep pens' on the remaining three arms of the junction are broadly fit for purpose however the applicant has suggested some modifications to enhance pedestrian comfort which, again, will also be secured via the same S106 legal mechanism.

In traffic and pedestrian capacity terms, the optimisation of the signalised 'Hillingdon Circus' junction has already been reviewed. When considering the proposed and committed developments and HS2 related activities it is apparent that the installation would at peak times, operate at or exceed capacity as is the case at present with exacerbation resulting from the flatted proposal. The aspect of insufficient 'green time' for pedestrians has also been raised by the local community. Some further optimisation for both vehicle and pedestrian movement may be attempted if this application receives consent however as highlighted earlier, the scope for improved vehicle capacity in combination with enhanced pedestrian facilities is not expected to be realistically achievable due to iterative optimisation attempts already undertaken which can only be progressed to a finite degree in order to achieve optimal performance.

#### Public Transport Enhancement / Financial Contribution

To fully justify a new or improved bus service, Transport for London (TfL) criteria demands a predicted minimum of 400-500 daily passenger bus trips before such a new or revised service can be implemented and trialled. There is also a yearly 'pump prime' start up funding demand over a five year period which requires external funding. If, after that time, the above criteria is met or exceeded then TfL will fully finance the running of the service.

In order to cater for this anticipated burden on local services that the additional pedestrian footfall generated by the 'Master Brewer' proposal would impose, the Council in tandem with TfL, have required securement of a financial contribution amounting to £75,000 per annum for a period of 5 years totalling £375,000 which the applicant has accepted as an obligation. This financial contribution is most likely to facilitate a new 278 bus service which is proposed to support the forthcoming Elizabeth Line services running between Heathrow and Ruislip via Hayes and Hillingdon. At the very least, the contribution will guarantee an additional single deck bus service for both the AM and PM peaks for 5 years. This will significantly enhance bus services for the local community including residents of the proposed development and would be centred on Hillingdon Underground (HU) Metropolitan/Piccadilly Line station which is located adjacent to the development.

It has been demonstrated that HU station will only exhibit a very marginal and therefore absorbable uplift in demand which negates the justification for financial contribution towards related service enhancements.

TfL have also requested a further supplemental financial contribution toward bus priority measures such as the installation of Selective Vehicle Detection (SVD) measures on the Hillingdon Circus signal installation. SVD is a method of bus priority that allows buses to be progressed through traffic signals by prioritising their passage to improve speed and reliability for passengers. To facilitate this provision a 'one-off' financial contribution of £30,000 is required. The applicant has accepted this as an obligation.

The other prominent and independent 'Oxford Tube' and X90 bus service is a well used and successful service provision which operates to and from Central London which provides a convenient sustainable transport mode. As outlined within the following synopsis there are improvements proposed to the westbound bus stop on Freezeland Way which entail creating a bus stop lay-by with a new bus shelter as this would assist in improving the usability and accessibility for the newly generated footfall of the development with consequential benefit to existing users.

#### Synopsis of Highway/ Public Transport - Interventions & Gains

As a consequence of discussions with the Council and the findings within the Transport Assessment (TA) and the previously submitted Pedestrian Environment Review Study (PERS) the applicant has undertaken, the following specifically identified mitigations would be secured and financed by legal agreement under Section 106 of the Town & Country Planning Act 1990 if the application receives consent:-

1. It is recommended that pedestrian and cycling crossing facilities be further investigated /improved at the Hillingdon Circus signal junction. As discussed in detail earlier within this chapter, this would involve pedestrian island and marginal road widening at the Long Lane (North) 'sheep pen' location with general modernisation across the remaining north, east and southern arms of the junction to enhance facilities for all users including cyclists.
2. An improved and revised westbound right turn filter carriageway lane from Freezeland Way into the service road fronting the site is proposed with the aim of reducing the need for westbound vehicles to navigate through the Hillingdon Circus signal installation in order to enter the site thereby limiting additional capacity burden on this main junction. The filter lane would be achieved by reducing the width of the existing grass verge in the vicinity of the existing right turn facility into the site. This is fully explored within the next chapter under 'Means of access to the site by vehicle'.
3. The entrance to the site at the south-western corner of the site envelope is suggested to form a 'gateway' into the site which would act as an extension and visual enhancement of the public realm situated within an extended site envelope which encroaches onto adopted public highway and Transport for London (TfL) land. This area of adopted land currently exhibits an expanse of relatively bland footway and 'triangular' area of grass verge. The main footways running directly alongside the carriageway would remain as adopted public highway however the remaining area leading towards the site would potentially require the 'stopping up' of public highway under section 247/252 of the T&CPA 1990 to allow for the provision of the 'gateway'. This is considered acceptable in principle as the area of land in question would be subject to betterment in both visual and usability terms by virtue of seamless merging of the public realm with the site itself.
4. In order to cater for this anticipated burden on local services that the additional pedestrian footfall would impose the Council, in tandem with TfL, have required securement of a financial contribution toward providing a new service bus provision amounting to a financial contribution of £75,000 per annum to TfL for a period of 5 years totalling £375,000. This financial contribution will facilitate a new 278 bus service which is proposed to support the new Elizabeth Line services running between Heathrow and Ruislip via Hayes and Hillingdon.
5. Bus priority measures in the form of Selective Vehicle Detection (SVD) at the signal junction would be introduced as described in the previous chapter and financed by a £30,000 contribution.
6. The footway at the existing westbound X90/'Oxford Tube' bus stop along Freezeland Road in proximity of the site would be widened to allow for a suitable bus shelter with necessary kerb adaptation to facilitate lay-by provision and mobility impaired access. This would assist in improving the usability and accessibility for the newly generated footfall of the development with consequential benefit to existing users.

7. The optimisation of the signalised 'Hillingdon Circus' junction would be further reviewed post permission to ensure that the most appropriate signal timings are in place in order to maximise capacity and minimise vehicle queue lengths with provision for sufficient pedestrian 'green time' on each junction arm. The review will be coordinated with Transport for London as signal performance falls under their jurisdiction.

8. Improvements to the service road approach in Freezeland Way (fronting the site) would be considered subject to the findings of a Highway safety audit (to be secured by way of planning condition). This would include the introduction of a 'No-entry' prohibition at the western end of the service road in proximity of the site entrance. This would assist in avoiding potential conflicts between vehicles leaving the site egress and vehicles approaching eastbound from the signal installation.

9. A review of the surrounding highway network in terms of monitoring parking displacement within a 2 year period post-implementation would be undertaken to determine whether any undue parking related detriment has been generated by the scheme. A sum of £20,000 would be secured for remedial purposes if so required.

10. A review of the lighting and the visibility of signs and road markings at and in the vicinity of the Hillingdon Circus junction (extent of review to be agreed with the Council's Highway Authority) with implementation of works as identified.

11. A review and provision (where appropriate) of carriageway and footway resurfacing, anti-skid surfacing and general upgrade of pedestrian islands (complementing enhancements highlighted in 2) above) and road markings (extent of works to be agreed with the Council's Highway Authority).

12. Vehicle actuated speed signs and road markings are to be provided on the westbound approach in Freezeland Way in order to enforce the 30 MPH speed limit (up to a cost of £5,000).

All the above interventions would be arranged by legal agreement via S106 of the Town & Country Planning Act 1990 and subsequently, where applicable, S278 of the Highways Act 1980 with all related implementation costs being absorbed by the developer at source negating any up front financial contribution to the Council.

When taking into account the aforementioned application of the outlined Highway and Public Transport interventions/enhancements, it is acknowledged that an element of highway and public transport gain would result if the scheme were to proceed. However the overarching key concern related to overburdening the Hillingdon Circus signalled junction would not be remedied. The cumulative traffic impacts combined with the listed committed developments would therefore render the scheme unacceptable on highway grounds.

#### Appraisal of the Surrounding Road Network and Site Access Infrastructure

##### Means of access to the site by vehicle

The site envelope is served by one existing vehicular access/egress point which feeds onto a segregated slip road running parallel to the main Freezeland Way (westbound) thoroughfare which is separated by a wide median strip consisting mainly of grass verge and street furniture. Within that strip there is a 'gap' which allows westbound vehicles on Freezeland Way to enter the slip road and then access the site by turning right. This averts the need to enter the heavily trafficked signalised junction when approaching from this direction and therefore assists in reducing additional capacity burden on the signalled junction itself. Further to this aim and to ease general traffic movement into the slip road, it is proposed to modify the existing 'gap' in order to facilitate a right turn filter lane for westbound vehicles by reducing the width of the median strip and grass verge. This work would be arranged via a s278 of the Highways Act 1980 agreement with all related implementation costs being

absorbed by the developer at source negating any up front financial contribution to the Council.

For vehicles approaching from the south on Long Lane must undertake a left turn manoeuvre at the 'Hillingdon Circus' signalled junction and then a u-turn is required at the next roundabout (located due north of Hercies Road) in order to return to the signalled junction and progress through to the slip-road fronting the site envelope with subsequent entry into the site.

Vehicles approaching the main junction from the north and west can readily enter the slip road and turn left into the site once they make passage through the signalised junction.

Irrespective of the level of traffic activity, this arrangement is considered as a workable and appropriate solution to gaining access to the site.

#### Means of departure from the site by vehicle

All traffic leaving the site must turn left and utilise the slip road to its furthest eastern extremity where it joins the main Freezeland Way (westbound) thoroughfare. From that point onwards all vehicles will dynamically assign to their desired routes and destinations via the signalised junction.

The 'left turn only' out of the site will require the creation of a point 'No Entry' prohibition in the slip road just west of the site access to prevent 'head on' conflicts with other vehicles entering the slip road directly from the signal installation. The 'No entry' prohibition will require statutory formal processes to be undertaken in the form of the creation of legally required traffic management orders (TMO's). The costs related to this process and the required signage will again be borne by the applicant via legal agreement.

#### Internal (thru-site) Roadways/Cycling/Pedestrian/Servicing Provisions

The internal roadways give broadly acceptable access to the all of the allocated surface level and podium level parking spaces for the residential and visitor uses. It has also been demonstrated that the roadways within and adjoining the site boundary with the adopted public highway can adequately cater for service, refuse collection and emergency vehicles without measurable hindrance by allowing such vehicles to enter and leave the site in a forward gear thereby conforming to established standards and best practice.

Designs therefore broadly conform to the Department for Transport's 'Manual for Streets' 2007 (MfS) established road layout design standards and the Institution of Structural Engineers (ISE) 'Design recommendations for multi-storey and underground car parks' (4th edition circa 2011) guidance with specific demonstration of suitability of podium layout provisions.

The internal roads are recommended to be speed controlled by a '20 MPH' zone which would be enforced by the internal site management regime. The latter would be supplemented by the 'in-built' speed reducing designs such as narrowing of carriageways by virtue of designated on-street parking, road curvature etc. This would clearly benefit pedestrians and cyclists within the new catchment who would also benefit from internal connectivity provisions by virtue of newly created integral pedestrian linkages incorporated within the main hub of the site which link conveniently to the external public domain.

#### Travel Plan - Residential & Performance Bond Contribution

An overarching Framework Travel Plan (FTP) has been submitted in order to capture and develop both the residential and workplace elements on an area wide basis encompassing the whole site. Specific and detailed residential and workplace travel plans will emerge and inform this overarching FTP as the monitoring regime unfolds subsequent to occupation.

This approach conforms with Transport for London's (TfL's) guidelines as it addresses all good practice mechanisms necessary to achieve a modal shift away from the private motor car thereby

leading toward a sustainable personal travel mode to and from the site. The FTP represents a long term strategy for managing travel by residents, employees, visitors and delivery related activities. It supports measures that promote and support sustainable travel choices and reduce single occupancy car journeys. These measures would for example include marketing and promotion of sustainable travel modes, encouragement of car sharing etc.

Each of the new residential occupiers would receive a 'Residential Travel Pack' to promote sustainable travel by suitable means such as public transport, walking and cycling. The applicant has indicated that sustainable travel is to be promoted with provisions such as free oyster cards (with £40 credit) provided for each household upon first occupation with 1 car club bay with a 3 year free car club membership to be provided for each residential dwelling upon first occupation. Subject to demand, this level of provision would be reviewed in future years.

Implementation, monitoring and management of the FTP would be undertaken by an appointed travel plan co-ordinator (TPC) who would work in partnership with Hillingdon and TfL together with stakeholders within the site.

The TP would therefore be reviewed on an on-going basis with travel surveys undertaken upon occupation of the development and thereafter at years 1, 3 and 5 to monitor its effectiveness as compared to the initial survey. A monitoring report would be produced by the TPC following each survey with distribution to all relevant parties including the local authority for review.

Specific SMART percentage modal shift targets have been set which is a pre-requisite requirement under TfL guidance. Under the FTP an overall modal shift target for the reduction in single occupancy car travel linked to the site would be in the order of 3 % following the 1st year of monitoring after first residential occupation. At subsequent monitoring years 3 and 5 this figure would equate to 3% and 4% respectively. The total target would therefore amount to a 10% reduction in single occupancy private car travel over 3 years.

To assist in achieving this aim, modal shift targets relating to sustainable travel modes such as walking, cycling, public transport use have broadly indicated an across the board 3% increase over a five year period.

The methodology of the FTP together with the above targets is accepted and welcomed however it is considered there is further scope to enhance the above 3% uplift target related to sustainable travel modes henceforth there would be a requirement for this to be revised and established post-permission within the full TP which would be secured under a S106 legal agreement.

Under the same legal remit, it is considered justifiable to apply a 'Performance Bond' in order to assist in ensuring the continuing success of the FTP as this would act as a clear incentive toward meeting and potentially exceeding the aforementioned agreed targets. This bond would amount to £20,000 and cover on-going monitoring costs and assist in achieving the target based performance of the FTP. If there is an unreasonable default in meeting targets then, to place matters 'back on track', the Council shall use the available monies to fund the delivery of appropriate travel plan measures.

Construction Logistics Plan (CLP) and Service Delivery Plan (SDP)

A full and detailed CLP and SDP will be a requirement to be secured under planning condition given the constraints and sensitivities of the local road network. Some detail of the construction programme and methodology has been presented within the TA however both plans will need to be secured under planning condition in order to optimise construction routing thereby avoiding/minimising potential detriment to the highly sensitive surrounding public realm.

Summary Conclusion

The highway/transport related consequences of the residentially dominant 514 residential unit flatted proposal with a commercial component has been assessed.

The Highway Authority is concerned that the proposal - i) exhibits insufficient on-plot parking provisions which are likely to create undue and injudicious displaced parking on the local road network and ii) would impose added and unreasonable traffic burden on the local road network namely the Hillingdon Circus signalled junction which currently operates at and beyond workable capacity, contrary to Policies AM14 and AM7 respectively of the Development Plan (2012) and emerging Local Plan Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and the National Planning Policy Framework (2019).

Refusal on insufficient parking grounds and excessive vehicular traffic generation is therefore recommended.

Please note:- that if Members were minded to approve this application, the following highway benefits/interventions which would be secured under section 106/278 of the Town & country Planning Act 1990 and Highways Act 1980 respectively are summarised and costed (where applicable) as follows:-

- i) Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities,
- ii) An enhancement to the western arm of the Hillingdon Circus Junction (Western Avenue approach) to include widening of the carriageway approach and 'left turn' lane road marking realignment.
- iii) Improved pedestrian and cycling facilities throughout the signalled junction.
- iv) Potential improvements to the service road approach in Freezeland Way (fronting the site).
- v) The creation of a new public realm 'Gateway' fronting the site on Freezeland Way.
- vi) A 5 year public transport contribution toward a new bus service (£375,000),
- vii) Bus priority measures (£30,000),
- viii) Enhanced bus stop provisions for the 'Oxford Tube' bus service,
- ix) Monitoring of signal optimisation @ Hillingdon Circus,
- x) Contingency monies to remedy any parking displacement onto the public highway (£20,000),
- xi) Travel Plan initiatives/incentives with a financial performance bond (£20,000),
- xii) Review of local public lighting, road signage and marking provisions,
- xiii) Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable.
- xiv) Implementation of vehicle actuated speed signs (up to a cost of £5,000).

## TREES AND LANDSCAPING

The former Master Brewer has been the subject of a number of previous applications, including 2017/3183, which was refused.

The site is covered by TPO 6, however, there are no protected trees remaining on the master Brewer site. Two oaks T7 and T9 survive on the Council-owned land in the south-east.

The site lies within Hillingdon's Landscape Character Area G3: Yeading Brook River Corridor

## BACKGROUND TO COMMENTS

These comments follow a site visit with the design team on 20 September 2019, a pre-application meeting on 21 November 2019, reference to the D&AS, dated October 2019 and submitted landscape drawings, by BMD.

## TREES & SITE CONTEXT

Since the previous application the site has largely been cleared, involving the removal of a large

number of trees, which were previously identified and assessed on the tree survey by BMD, dwg. ref. 14.052,902 Rev P1. As a result of the site clearance, any boundary screening is now heavily reliant on off-site, or 'borrowed' tree cover which lies outside the control of the developer.

Remaining tree cover includes the wooded road embankment alongside Long Lane (west boundary), tree and shrub cover at the top of the retaining wall adjacent to the A40 (north), the mixed woodland on the Council-owned land (south-east corner) and the part-wooded Green Belt land of Freezeland Covert to the east. Since the previous applications, the current developer now owns the plot of land adjacent to the east boundary which will facilitate both visual and physical connectivity between the site and the public open space to the east.

Further to the pre-application discussion additional / replacement tree planting, using native species, has been proposed by BMD, within the site, in an attempt to re-inforce the tree screen on the Long Lane (west boundary). More recently the large Weeping willow at the site entrance (on highway land) has suffered from the collapse of a major limb and will be removed by the Council. - This work is essential for reasons of safety and sound arboricultural management. Although the tree is not protected by TPO, it is a prominent feature and local landmark, and had been identified for retention and inclusion in the site masterplan. The loss of this tree presents an opportunity for the developer to provide a suitable replacement focal point on this prominent corner.

#### LANDSCAPE MASTERPLAN

The proposed masterplan includes an entrance square, a central green space, green 'fingers' linking the east of the site with the public open space to the east, the provision of landscaped pedestrian routes, the introduction of private amenity space and shared space at ground and roof top /podium levels. The masterplan proposes six distinct character areas; Hillingdon Circus, The Approach, High Gardens, Brewery Garden, The Wanders and The Meadow (p.77).

A soft landscaped buffer along the southern boundary is intended to safeguard the off-site (protected) oaks and retain space and opportunity for the future redevelopment of the Council-owned land to the south-east - as indicated in the aerial perspective (p.74).

#### LANDSCAPE & BIODIVERSITY

The D&AS notes the presence of London Wildlife Trust sites in the vicinity (p.48), which are situated along two principal wildlife corridors on a north-south axis, to either side of the site. The landscape proposals for the development seek to bridge the gap between the two green corridors.

The landscape masterplan further defines six character areas; Arrival Square, Natural Edge, Entrance Courtyards, Central Parklands, Podium Gardens and Green Streets, with the latter incorporating SUDS (p. 114, please refer to the drainage specialists for comment).

A play space strategy is described (p.112), which will provide facilities for Doorstep Play (0-5's), Local Playable Space (5-11's) and Youth Space (12+).

Specific (illustrative) landscape features include green and brown roofs, hard landscape materials, street furniture, external lighting and proposed tree and planting palettes.

The planting palettes include a mix of native species and ornamental varieties which are known to be pollen / nectar bearing - and of value to wildlife.

The 'removed and retained' tree strategy (p.122) is somewhat disingenuous, since it fails to convey a large number of good trees which have already been removed prior to the submission of the application, with only trees along the northern boundary remaining (prior to removal).

The planting of over 200 new / replacement specimen trees is proposed



## PROPOSED BUILDINGS

The current layout features the tallest building in the north-west corner with other building stepping down towards Hillingdon Circus (south) and towards Freezeland Covert in the east..

## SUMMARY / CONCLUSION

The tree loss on the proposed development is significant, with much of the tree removal already implemented. As previously noted the quantum of loss was previously accepted by the Council, as part of the Tesco scheme. No protected trees will be removed to facilitate the development.

The additional height of the proposed development will inevitably have greater visual impact on the surrounding receptors.

The open spaces and landscape proposals within the site appear to be an improvement on the previous schemes, albeit the potential adverse effects on daylight and microclimate are not known.

The acquisition of the plot of Green Belt land to the east is, potentially, a significant benefit to the scheme and presents new opportunities to improve both the visual and physical connections to the Green Belt. The 2017/3183 application included a S.106 contribution to develop and implement a comprehensive landscape masterplan (by Grontmij) for the Green Belt land between the site and Freezeland Covert.

Biodiversity Net Gain and Urban Greening Factor calculations have been prepared by the London Wildlife Trust. It is not known when this assessment was carried out in relation to the tree removal from the site, however, report notes that the benefits of the scheme will depend on a revised plan and as yet unspecified future management details will be required. It also refers to the retention and enhancement of existing broadleaf woodland - which does not form part of this masterplan.

The urban greening factor has been introduced as part of the London Plan, as a means of scoring the merit of various green infrastructure and SUDs interventions across the urban environment.

The developer should provide a measured assessment and scoring of these landscape and wider environmental benefits provided by the development, to aid the assessment of the scheme by the LPA.

## RECOMMENDATIONS

If you are minded to approve this scheme, landscape conditions should include conditions RES8, RE9 (parts 1,2,3,4,5 and 6) and RES10 (as set out below) and a S.106 agreement to secure landscape enhancement of the Green Belt land to the east of the development site.

RES8) Trees, hedges and shrubs shown to be retained on the approved plan(s) shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during (or after) construction, or is found to be seriously diseased or dying, another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the 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.  
No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

RE9) 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.

RES10) No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. 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 demonstration that 5% of all parking spaces are served by electrical 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 surfacing/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.

#### ENVIRONMENTAL PROTECTION UNIT (AIR QUALITY)

(comments provided by Air Quality Experts Global Ltd (acting on behalf of the Council))

The proposal seeks 514 residential units and comprises in total 12 buildings, located within the A4/Long Lane Focus Area. The proposed development, due to its size and location, will add to current exceedances of the nitrogen dioxide annual mean limit value within this sensitive area as a result of both traffic and energy production emissions.

It is noted that the impact on local air quality of nitrogen dioxide emissions associated with energy production was not assessed as part of the air quality assessment submitted to support the planning application. When such contribution is added to the traffic emissions, there will be at least a moderate adverse impact on local air quality, at least at receptor "R18, Douye School East", which already experiences a concentration (51.35 microg<sub>g</sub>-grams/m<sup>3</sup>) well above the limit to safeguard human health (40 micrograms/m<sup>3</sup>).

In addition, the applicant has not submitted the air quality neutral assessment as per the Mayor's requirement. However, to support the process, LBH has undertaken the calculations and the proposal is not air quality neutral in terms of traffic emissions. As per the London Plan, developments need to be neutral as minimum and contribute actively to reduce pollution in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

#### DAMAGE COST AND MITIGATION MEASURES

Therefore, a section 106 agreement with the LAP of £294,522 would have 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, assuming no local network congestion would be exacerbated by the proposal. However, LBH Highways comments on the traffic impacts of the proposal reveal that there will be an exacerbation of congestion at the road network affected by the vehicular movements associated with the operational phase of the proposed development. Congested traffic emits significantly higher loads of pollution levels due to idling and stop start emissions. As per LBH Highways reported concerns, the highway/transport related consequences of the residentially dominant 514 residential proposal with a commercial component will impose added and unreasonable traffic burden on the local road network (namely the Hillingdon Circus signalled junction which currently operates at and beyond workable capacity) with resulting hazardous impacts on local air quality and public health. In addition, as reported above, the proposal is not air quality neutral, as required by the London Plan, and no suitable mitigation measures were offered by the applicant, as required by the National Planning Policy Framework (2019).

This is contrary to Policy EM8 of the Development Plan (2012) and emerging Local Plan Part 2

Development Plan Policy DMEI 14, the London Plan, and the National Planning Policy Framework (2019).

2 Reason for Refusal (if objecting) Refusal on air quality and public health grounds and absence of suitable mitigation measures is therefore recommended.

As the application site is within an Air Quality Management 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 - Development Management Policies (2020), London Plan Policy 7.14, and paragraph 170 of the National Planning Policy Framework (2019).

### 3 Observations

Should Members be minded to approve this application, a suitable S106 contribution will have to be calculated using congestion traffic information. In addition, two Air Quality conditions are required to develop and implement a Low Emission Strategy and manage the construction fleet as per Mayor requirements.

See text below.

#### Condition Air Quality - Low Emission Strategy

1. No above ground works shall be undertaken until a clear and effective low emission strategy (LES) have been submitted to and approved in writing by the Local Planning Authority. The strategy shall include, but not be restricted to:

a) effective ways to manage contractual arrangements with the occupiers of the flexible commercial use so that the fleet composition serving the site facilities will be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards;

b) provision of a clean supply of energy to the site. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements. The boilers to be specified to meet ultra-low NOx emissions standards of < 40mg/kWh.

The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority.

c) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with the minimum requirements as per the London Plan.

d) a clear and effective strategy to encourage/support staff and residents of the site to

i) use public transport;

ii) cycle / walk to work where practicable;

iii) enter car share schemes;

iv) enter cab share schemes to and from the airport and or home / work locations;

iv) purchase and drive to work zero emission vehicles.

Measures to support and encourage modal shift, will include but be not restricted to incentives for residents and employees to use public transport to reduce their car ownership.

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 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 emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, and

paragraph 170 of the National Planning Policy Framework (2018).

#### Air Quality - Construction

2. No development shall commence until proof of the registration in GLA's database ([nrmm.london/nrmm/about/what-nrmm-register](http://nrmm.london/nrmm/about/what-nrmm-register)) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority.

3. The London's Low Emission Zone for non-road mobile machinery to comply with the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.

4. This will apply to both variable and constant speed engines for both NOx and PM. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments.

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and London Plan Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition' (2014).

#### Wider Context

Focus areas are defined as locations where pollution levels are already high and there is relevant public exposure. In such circumstances there is a requirement to put in place actions to improve air quality. In addition, there is a requirement under planning policy (London Plan and LBH Local Plan) for development to be at least air quality neutral and to not cause further deterioration of existing air quality.

The air quality assessment provided has assessed the development in terms of the air quality impacts on existing receptors from the operational traffic associated with the development. The pollution impact has been assessed in the opening year of 2021 both with and without the development, with the development causing a worsening of a future-predicted exceedance. In such circumstances any increases in pollution are judged to be significant and the development will require to provide sufficient quantified mitigation measures to ensure this risk to public exposure is addressed.

In terms of transport the benchmark figure is exceeded, therefore the development is not air quality neutral in terms of transport emissions.

Given the location, this development is not supported without the submission of an air quality neutral assessment detailing the building emissions assessment and any appropriate mitigation to ensure neutrality, plus a quantified low emissions strategy addressing the transport emissions to ensure neutrality. This approach is supported by the Mayor of London Sustainable Design and Construction SPG 4.3.26.

The Applicant was given the opportunity to respond to the above comments and on 31.01.19 Air Quality Experts Global Ltd (acting on behalf of the Council) provided the following further comments:

1) our initial views, observations, and recommendations still stand and please refer to them in your final report (attached again for your reference). In regards to the final S106 contribution due to air quality, the applicant has not provided any quantification of the emission reduction any proposed measures would achieve and what benefits would they yield in terms of air quality. The final damage cost can only be reduced if such quantification is undertaken. Therefore, as we had offered already a 10% discount assuming an effective travel plan would be implemented, we can only offer a further 5% discount, subject to agreed contributions towards either modal shift (assuming they contribute to

public transport solutions) and / or green wall implementation. These measures will have to be secured by a bond, tying the applicant to implement the measures (to be agreed with LBH). I attach the final value, assuming they will implement such agreed/accepted measures(to be agreed with Val/Alan). The new value will be £278.159.

2) in regards to the proposal related monitoring:

a) monitoring locations chosen - these are not located at hot spot locations where GLA mapping depicts exceedances to the limit value (annual mean - nitrogen dioxide) and which are likely to be affected by the proposed development

b) monitoring duration - three months of monitoring is bare minimum and really not ideal to draw conclusions on annual mean values and compliance status to safeguard human health; once three months of data are captured, values need to be annualised using data from other locations once full year calendar data are available as per Defra's TG16 guidance - to observe this, it will be too late to support the application ;

c) conclusions in the updated report based on 10 days of monitoring data are unacceptable;

d) monitoring is taking place now (end December 2019/January 2020); model verification used 2017 data - no comparisons can be made between modelled and monitored data as attempted by the applicant;

3) no neutral assessment was again submitted by the applicant as per the London Plan requirements. As per LBH calculations the proposed development is not neutral and no proof to contrary has been provided to date by the applicant;

4) argument regarding worsening of existing exceedances as insignificant is contrary to LBH, GLA , and NPPF Policy which require air pollution is not further deteriorated within sensitive locations by new development. The proposed development is within an AQMA and a Focus Area. This is also against actions and efforts within LBH Air Quality Local Action Plan which works towards proposals actively improving air quality within Focus Areas ;

5) Mitigation offered is not quantified in terms of emission reduction achieved therefore cannot be considered as balanced and in direct proportion to the emissions produced by the development; it is noted that the site is currently a brown field site;

6) Whereas the applicant claims the new proposed development (514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); with associated car park (164 spaces)) will not exacerbate congestion in the area and has insignificant impact on local air quality, no suitable evidence has been produced to substantiate that. In addition, this claim is contrary to LBH Highways observations.

7) Finally, the impact on local air quality of nitrogen dioxide emissions associated with energy production was still not assessed as part of the air quality assessment submitted to support the planning application. As noted in our original response, when such contribution is added to the traffic emissions, there will be at least a moderate adverse impact on local air quality, at least at receptor "R18, Douye School East", which already experiences a concentration (51.35 ug/m3) well above the limit to safeguard human health (40ug/m3). Furthermore, no Root Mean Square Error (RMSE) was calculated for the modeled results, so LBH does not have a measure of model performance and or uncertainty range associated to the results reported.

The Applicant responded to the above comments and Air Quality Experts Global Ltd (acting on behalf of the Council)) provided further comments as below:

1) our initial views, observations, and recommendations still stand and please refer to them in your final report (attached again for your reference). In regards to the final S106 contribution due to air quality, the applicant has not provided any quantification of the emission reduction any proposed measures would achieve and what benefits would they yield in terms of air quality. The final damage cost can only be reduced if such quantification is undertaken. Therefore, as we had offered already a 10% discount assuming an effective travel plan would be implemented, we can only offer a further 5% discount, subject to agreed contributions towards either modal shift (assuming they contribute to public transport solutions) and / or green wall implementation. These measures will have to be secured by a bond, tying the applicant to implement the measures (to be agreed with LBH). I attach the final value, assuming they will implement such agreed/accepted measures (to be agreed with Val/Alan). The new value will be £278.159.

2) in regards to the proposal related monitoring:

a) monitoring locations chosen - these are not located at hot spot locations where GLA mapping depicts exceedances to the limit value (annual mean - nitrogen dioxide) and which are likely to be affected by the proposed development

b) monitoring duration - three months of monitoring is bare minimum and really not ideal to draw conclusions on annual mean values and compliance status to safeguard human health; once three months of data are captured, values need to be annualised using data from other locations once full year calendar data are available as per Defra's TG16 guidance - to observe this, it will be too late to support the application ;

c) conclusions in the updated report based on 10 days of monitoring data are unacceptable;

d) monitoring is taking place now (end December 2019/January 2020); model verification used 2017 data - no comparisons can be made between modelled and monitored data as attempted by the applicant;

3) no neutral assessment was again submitted by the applicant as per the London Plan requirements. As per LBH calculations the proposed development is not neutral and no proof to contrary has been provided to date by the applicant;

4) argument regarding worsening of existing exceedances as insignificant is contrary to LBH, GLA , and NPPF Policy which require air pollution is not further deteriorated within sensitive locations by new development. The proposed development is within an AQMA and a Focus Area. This is also against actions and efforts within LBH Air Quality Local Action Plan which works towards proposals actively improving air quality within Focus Areas ;

5) Mitigation offered is not quantified in terms of emission reduction achieved therefore cannot be considered as balanced and in direct proportion to the emissions produced by the development; it is noted that the site is currently a brown field site;

6) Whereas the applicant claims the new proposed development (514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); with associated car park (164 spaces)) will not exacerbate congestion in the area and has insignificant impact on local air quality, no suitable evidence has been produced to substantiate that. In addition, this claim is contrary to LBH Highways observations.

#### ENVIRONMENTAL PROTECTION UNIT (CONTAMINATION)

I have reviewed the Preliminary Geo-Environmental Risk Assessment; Issued: October 2019; Project No. 17-0420.02; Prepared by: Delta-Simons Environmental Consultants Limited

The risk assessment and preliminary conceptual site model (CSM), identify various contaminants, (possibly associated with Made Ground), that may be present at the site.

Despite the Pollutant Linkage Assessment within the report (pp14-15) indicating a generally low risk, (low to moderate risk in terms of the made ground), of significant contamination across the site, there are however areas associated with underground tanks and reservoir where uncertainty exists.

Therefore, it is recommended that conditions be imposed as follows:

Proposed conditions for land affected by contamination.

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

a) A targeted site investigation, focusing on areas of potential contaminants at: i) the location of the infilled pond; ii) the location of the underground reservoir / storage tank/s. The investigation should include, where relevant, soil; soil gas; surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

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

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

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

#### REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy OE11 of the Hillingdon Unitary Development Plan Saved Policies.



## Observations:

Previous reports have identified the presence of:

- PAH
- Total Petroleum Hydrocarbons
- Metals
- Sulphates
- A former pond (now infilled)
- Underground storage tank/s (UST)
- A covered reservoir is also shown on mapping. (However, it is understood the possible connection of the UST structures and/or their continued presence at site are unknown).

## ACCESS OFFICER

In assessing this application, reference has been made to the 2016 London Plan and its contained policies 3.5, 3.8 and 7.2. Whilst the supporting Design & Access Statement suggests that the development would be compliant with London Plan policy 3.8, the plans do not adequately demonstrate how the prescribed standards have been incorporated, and importantly, exactly where within the building the M4(3) units would be situated. Likewise, no information has been provided on how principles of Inclusive Design have been considered and applied throughout the development, and further details would also be required in this regard:

1. Details of the external environment and how it would cater for all that disabled people, to include suitable walkways and wayfinding for blind and visually impaired persons have not been provided/.
2. A drop-off point for door-to-door service providers, to include large Dial-A-Ride vehicles is not shown on plan, and should be provided for a development of the scale'
3. An accessible parking space, designed in accordance with BS 8300:2018, should be allocated to every M4(3) wheelchair accessible/adaptable unit.
4. 10% of new residential units would need to meet the standards for M4(3) Category 3 - wheelchair user dwelling. The units should be interspersed throughout the development, to include all typologies and tenures, which must be fully detailed on plan
5. The M4(3) dwellings for sale on the open market should meet the minimum standards required for a Wheelchair Adaptable home, with all Affordable Housing dwellings constructed to a Wheelchair Accessible standard, making them suitable for 'day one occupation' by a wheelchair user. These units should be shown on plan to demonstrate functional and spatial provisions for wheelchair adaptable and/or wheelchair accessible housing.
6. 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.
7. 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.
8. The landscaping strategy for any intended roof gardens should detail the accessibility provisions, to include pathway surfacing, seating and play space.
9. Details are required on the accessible play equipment for disabled children, to include 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.

10. No details have been provided on the means of escape provisions for older or disabled people in the event of a fire or similar emergency situation.

Conclusion: unacceptable. The proposed development in its current format fails to include sufficient detail to demonstrate compliance with London Plan policy 3.5, 3.8 and 7.2.

Following the submission of further information the Access officer provided the following comments:

Following review of the submitted layout plans for the proposed M4(3) Wheelchair Accessible/Wheelchair Adaptable dwellings, the previous accessibility concerns have been addressed.

However, a number of concerns relating to the external environment remain outstanding which could be addressed via the proposed planning conditions:

Not less than one accessible parking space shall be allocated to each Wheelchair Home Standard dwelling house, which shall be secured by way of deed or covenant. The accessible parking bays shall accord with the design principles as set out in BS 8300:2018, with all defining features and facilities retained in perpetuity.

REASON: To ensure that sufficient housing stock is provided to meet the needs of wheelchair users in accordance with Policy 3.8(d): Housing Choice of the adopted London Plan (March 2016).

The development hereby approved shall ensure that 10% of the residential units are constructed to meet the standards for Category 3 M4(3) dwelling, with all remaining units designed to the standards for 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.

REASON: To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 (c) and (d) is achieved and maintained.

Prior to the occupation of the dwellings hereby approved, a building completion certificate, issued by Building Control or an equivalent representative body, confirming compliance with the prescribed standards for M4(2) and M4(3) dwellings as set out in Approved Document M to the Building Regulations (2010), 2015 edition, shall be submitted to the Local Planning Authority.

REASON: To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 (c) and (d), is achieved and maintained.

Prior to the occupation of the development hereby approved, details of children's play equipment to be installed, to include young people with sensory and/or complex multiple disabilities, shall be submitted to and approved in writing by the Local Planning Authority; all such provisions shall remain in place for the life of the building.

REASON: To ensure that all children and young people, including those with sensory, complex or multiple disabilities, have access to suitable play areas and equipment, in line with London Plan 3.6 and 7.2

No development shall take place until details have been submitted to and approved in writing by the Local Planning Authority of: (i) an external environment that is conducive to the mobility needs of blind and visually impaired people, to include wayfinding and suitable crossing points, materials and street furniture that provide adequate contrast against which they are seen; (ii) pavers and other surfacing materials that provides wheelchair users with a smooth, seamless surface, with appropriately positioned crossing points. Thereafter, the development shall be implemented in accordance with the approved details and the accessibility features shall thereafter be retained in

perpetuity.

REASON To ensure that older and disabled people have good access to the development in accordance with policy 7.2 of the London Plan (2016).

## EXTERNAL CONSULTANTS ACTING ON BEHALF OF LB HILLINGDON

### NOISE

Following an initial review by Anderson Acoustics (Acting on behalf of the Council), the Applicant submitted further information. In response, Anderson Acoustics provided the following recommendations (04-02-20):

In terms of the scope of this review, the suitability of the PAAA, and the scheme's compliance with policy, rests on whether sufficient consideration has been given to the layout/design with respect to acoustics, ventilation and overheating. As it stands, it is our opinion that this is not demonstrated at present with regard to the cooling hierarchy and the effect of internal noise levels if the windows are required to be open for cooling. It is recommended, therefore, that further information be sought from the developer to demonstrate, if this is indeed the case, that the risk of overheating throughout the development is at an acceptable level. This may be as simple as submitting the over heating analysis that has already been produced but is not publicly available. It is recognised that the PAAA has been updated to provide the requested further information on:

- The good acoustic design process;
- External amenity noise levels and mitigation to these areas;

The following information that was requested following the Rev.8 review has not been provided and the request is reiterated:

- Further information on the proposed ventilation system intake and extract locations and cooling potential;
- Confirmation that the LAFMAX and WHO guidelines for internal noise levels in bedrooms at night are met;
- Baseline background sound levels and discussion of plant and commercial use noise assessment to be conducted at detailed design stage.

Our recommendations are summarised as follows:

- For LBH to request from the developer justification for the MVHR in the context of the London Plan's cooling hierarchy and sustainable development;
- For LBH to request the over-heating analysis mentioned is submitted to assist in the determination of the planning application;
- For the LBH, in the event of planning permission being granted, to apply conditions for the CEMP; commercial and plant noise assessment and limits; and details of the final noise mitigation (including external amenity areas), ventilation and cooling strategy.

### DAYLIGHT SUNLIGHT (Lambert Smith Hampton)

Following an initial review by LSH (23/12/19) and the response letter dated from Robinsons dated 24/01/20, LSH comment as follows (31/01/20):

#### Window Transmittance and Surface Reflectance

The main issue with the values used relate to the glazing, the chosen system is high end glazing units. If this type of glazing is used in the development, then the results for daylight will be as per the Robinson report. If however, high end glazing units are not used in the development, then the results would be more detrimental to daylight results.

Perhaps consideration should be given to make a planning condition for high end glazing units, to ensure the daylight results are achieved.

### Daylight

Dealing firstly with average daylight factor (ADF), our original letter gave the British Standard definition of open plan living areas, notably a lounge/dining area intrinsically joined to kitchens. The kitchens are clearly linked to the dining areas and lounge areas. The Robinson report have given their reasons for removing the kitchen sections of the rooms, citing that these kitchens are rooms that are considered too small to be considered habitable and suitable for daylight and sunlight analysis.

The Robinson letter states that the London Borough of Hillingdon has accepted this approach in the past and this method was accepted in the previous application.

The BRE guidance states (2.1.14) non-daylit kitchens should be avoided where ever possible.

This point will be for Hillingdon to determine if removing the kitchens for assessment is acceptable. Moving to daylight distribution (DD), the BRE guidance and RICS guidance note both state that DD should be calculated. If an area of the working plane lies beyond the no sky line (more than 20%), daylight will be poor and supplementary lighting will be required.

The Robinson analysis shows that 310 of the rooms fall short of the target values, of these, 224 are bedrooms. The guidance does recognise that daylight is less important in bedrooms.

It will be for Hillingdon to decide if the remaining 86 rooms that fall short are acceptable. It should be noted that we do not know how many rooms in total were analysed.

### Sunlight

The BRE guidance and RICS guidance note state that windows should be tested for APSH, the Robinson report has analysed and used room results, as these are more favourable than window results.

The Robinson response states that this method was accepted by Hillingdon in the previous application. Again, it will be for Hillingdon to decide if using room results over window results are acceptable.

### Overshadowing

We have no comments to make on this as the results confirm the scheme does comply

## **7. MAIN PLANNING ISSUES**

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

This application seeks full planning permission for a residential led mixed-use development comprising 514 residential units and flexible commercial space (Use Class B1/A1/A3/D1).

The National Planning Policy Framework (2019) 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.

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.

London Plan (2016) policy 3.3 similarly seeks to ensure that London's housing needs are met. This objective is reiterated in the Mayor of London's Supplementary Planning Guidance (SPG) on Housing, although it must be noted that the SPG is clear that in achieving housing targets, full account must be given to other policy objectives and that to address London's strategic housing requirement and reconcile any local disparities between housing need and supply, boroughs should identify and proactively seek to enable extra housing capacity through the preparation of their Local Plans.

Notwithstanding this general policy support for new residential developments, it is clear that careful consideration must be given to the ability of development proposals to also meet other planning policies and also the ability of authorities to meet their housing needs.

The application site forms part of the adopted site allocation; Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part 2 - Site Allocations and Designations (2020). This site allocation designates land to the east and west of Long Lane as a strategic site allocation, for a residential led mixed use development. The site allocation itself comprises of Site A and Site B. This application site falls within Site B of that broader allocation, however the application site does not comprise the whole of Site B.

Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part 2 - Site Allocations and Designations (2020) states that the Council will support mixed use proposals on Site B that meet the following criteria:

"Development within the developed areas should:

- Secure substantial planting and landscaping in association with any development;
- Promote a mix of uses that takes advantage of the north/south east/west communications network to serve Borough-wide and community interests;
- Environmental improvements and landscaping as necessary to enhance the local shopping and residential environment; and
- Result in public transport improvements particularly North/South links.

Should proposals come forward that involve the development of Sites A and B for predominantly residential purposes, the following key principles will need to be considered.

- A range of housing types and tenure will need to be provided on the site, to reflect the conclusions of the Council's latest Housing Market Assessment.
- The key urban design principles should result in the creation of a neighbourhood with clearly defined links to the main shopping area in North Hillingdon, where the scale and massing of buildings reflects local character and the PTAL rating of the site.
- Whilst the nature of the scheme will be predominantly residential, the Council will accept a proportion of other uses that are appropriate to the site's location within the North Hillingdon Local Centre, including a hotel, restaurant and small scale retail."

More broadly, the wider SA14 allocation is also required to meet the following policy requirements, also set out within adopted Site Allocation policy SA14;

"All proposals across Sites A and B should:

- Be of a scale that is in keeping with the Local Centre; and
- Form a comprehensive development scheme across the whole site.

The cumulative impact of any proposed retail or leisure development on this site and the adjoining Master Brewer site will be taken into account by the Council when considering any future proposed scheme; in particular in terms of their likely effects on surrounding residential areas and shopping centres, public transport services and the local road network."

The principle of residential-led mixed-use development on the site is therefore established through the development plan. However, the form of the current application fails to meet with Policy SA14 in a number of ways, both for Site B itself and also for the wider site allocation of Sites A and B. All of the specific issues are discussed in detail within the body of this report, but to summarise;

- the proposals fail to secure substantial planting and landscaping in association with the development resulting in a stark and oppressive built form when viewed from the surrounding area, in both short and long views;
- the proposed commercial uses within the scheme are contained within the site and are likely to have limited linked functions/trips to the existing local centre, therefore failing to enhance the existing local centre;
- the proposals fail to deliver a scheme of an appropriate scale and massing to reflect the local character and are not in keeping with the Local Centre.

## HOUSING SUPPLY

The proposed development would provide 514 new residential units, which will contribute towards the Council's housing supply, however for clarification purposes, this site is not required for the London Borough of Hillingdon to demonstrate a supply of deliverable sites sufficient to provide a minimum of five years worth of housing against the adopted London Plan (2016) and the 10,380 homes target identified in Policy H1 of the Intend to Publish version of the London Plan (2019). Therefore whilst the delivery of new homes is welcomed on this site, the failures of the current proposals outweigh the need for housing delivery in the borough, as the Council is able to demonstrate a five year housing supply.

### Local Centre

The site falls within a designated Local Centre. Policy E5 (Town and Local Centres) of the Local Plan Part 1: Strategic Policies (2012) says that the Council will improve town and neighbourhood centres across Hillingdon and improve public transport, walking and cycling connections to town and neighbourhood centres whilst ensuring an appropriate level of parking provision is provided for accessibility to local services and amenities.

The re-use of previously developed land in Local Centre for new housing as part of a mixed use schemes is considered to be consistent with both national and local planning guidance. However Policy E5 of the Hillingdon Local Plan Part 1 Strategic Policy does however stipulate that an appropriate level of parking provision is provided for accessibility to local services and amenities. In particular regard to parking, the proposed scheme is not considered in accordance with this part of Policy E5 of the Hillingdon Local Plan Part 1 Strategic Policies (2012) which is detailed further under section 7.10 of this report.

### Commercial Uses

Paragraph 80 of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

A mixed use development incorporating some commercial uses is therefore supported by the NPPF. It is however noted that planning permission is sought for 1,200sqm of commercial floorspace, comprising a range of use classes including A1; retail, A3;

Restaurants and Cafes, B1; Business/Offices and D1; Non-residential institutions. There is no in principle objection to the uses proposed, however there is a concern that all of the 1,200sqm could be used solely for just one of those uses, rather than a mixture of these uses. Therefore had this application been approved, a condition restricting the quantum of each use would be imposed to ensure an adequate mix of uses is secured to ensure the vitality of the ground floor uses. Furthermore, some uses within the D1 use class can cause significant concern due to the associated traffic generation, such as nurseries, schools and places of worship. Therefore had planning permission been granted, a restriction of the final use of any D1 uses facilitated on the site would have precluded occupation by the aforementioned uses to prevent detrimental impacts on the local highway network.

In summary, the principle of redeveloping this vacant site for residential led mixed use is considered to be in accordance with the development plan and is therefore deemed acceptable in principle.

Therefore whilst the principle of mixed use is established by the Site Allocation; SA14, the application must also be assessed against all other planning policies as a whole as well as other material planning considerations.

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

### **DENSITY**

The application site has an area of 2.53 Ha. The local area is considered to represent a suburban context and has a Public Transport Accessibility Level (PTAL) of both 2 and 3 (where 0 is low and has low levels of accessibility and 6 is the highest PTAL level). Policy 3.4 of the London Plan says that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 and development proposals which compromise this policy should be resisted. Table 3.2 of the London Plan recommends that for sites with a PTAL rating of 2 - 3, a density of between 150-250 habitable rooms per hectare and 50-95 units per hectare (assuming 2.7-3.0 hr/u) can be achieved. For an urban context, Table 3.2 of the London Plan recommends a range of 70-170 u/ha or 200-450 hr/ha and for a central setting the London Plan suggests a density of 100-240 u/ha or 300 - 650 hr/ha.

Notwithstanding the above policy reference in the latest version of the emerging London Plan (Intend to Publish version Dec 2019) demonstrates the removal of the density matrix table 3.2 which is used as a guide for decision makers to assess optimal density for housing sites. It is therefore considered that whilst referred to above the optimal density should be assessed against the Local Planning Authorities density matrix within its adopted Local Plan.

Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2. Developments will be expected to meet habitable rooms standards. Table 5.2 stipulates a density standard of 200-510 hr/ha or 80-170 u/ha.

The residential density of the proposed scheme would be 552 hr/ha (based on 1398 habitable rooms) or 203 u/ha which exceeds the upper limit of the indicative range within Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020); Table 5.2 and Table 3.2 of the London Plan (2016).

The Planning Authority accept that the density matrix should not be applied mechanistically enabling account to be taken of other factors relevant to optimising potential such as local context, design, transport, social infrastructure open space.

Draft Policy D3 of the London Plan (Intend to Publish version Dec 2019) advocates a design led approach in order to optimise site capacity. It should be noted that the policy refers to 'optimisation' and not maximisation. The proposed development deviates from optimising the site to maximising the sites capacity by failing to meet some of the key requirements of draft policy D3 of the London Plan (Intend to Publish version Dec 2019) insofar as the scheme fails to enhance the local context by imposing a scale on the local neighbourhood centre that has no bearing on the existing and emerging street hierarchy. It is acknowledged that an extant consent on Site A has a greater form than that of the neighbourhood centre, indeed the application site itself previously had consent for a greater scale of development than its immediate environs, however these development proposals were of a scale that respected the existing environment. Their form respected the existing local centre but the current proposals fail in this respect by imposing a height, massing and scale that bear no resemblance to that of the surroundings.

The site is not considered to lend itself to high density development and is therefore contrary to London Plan Policy 3.4 (2016) and Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020); Table 5.2. Furthermore, the proposed development is considered to represent over development of the site to the detriment of the local area.

## UNIT MIX

Policy DMH 2 (Housing Mix) of the Hillingdon Local Plan Part 2: Development Management Policies (2020) says that the Council will require the provision of a mix of housing units of different sizes to reflect the Council's latest information on housing need.

Policy H10 of the Intend to Publish version of the London Plan 2019 (Part A6) also states that unit mix should take account of the nature and location of the site with a higher proportion of one and two bed units generally deemed more appropriate in town centre locations, such as this site.

Residential accommodation is provided in the form of apartments and duplexes, incorporating a mix of market and affordable accommodation of varying sizes. The residential unit mix is provided below:

1 bed x 221 (43%)  
2 bed x 216 (42%)  
3 bed 5 person x 77(15%)

The proposed mix of units is considered appropriate and acceptable for this location and is therefore consistent with Policy DMH 2 (Housing Mix) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (Intend to Publish version 2019).

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

### ARCHAEOLOGY

Policy 7.8 of the London Plan (2016) seeks to protect and conserve heritage assets and archaeological remains and this is reiterated in draft Policy HC1 of the London Plan (Intend



to Publish (Dec 2019)). Paragraph 189 of the NPPF (2019) says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

Policy DMHB 7 (Archaeological Priority Areas and Archaeological Priority Zones) of the Local Plan: Part 2 - Development Management policies (2020) says 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.

In this regard an Archaeological Desk Based Assessment has been submitted in support of the application and Historic England (GLAAS) have been consulted.

Although the site does not fall within an Archaeological Priority Area, Historic England (GLAAS) considers that the proposed development is situated in an area of archaeological interest and where archaeological remains may be anticipated.

The Applicant's archaeological desk-based assessment identifies medium potential for later prehistoric or Roman remains based on recent discoveries in the surrounding area. The site lies on London Clay which has often been considered unattractive to early settlement but these recent discoveries show that, as is found elsewhere in southern/midland England, some settlement expanded onto the claylands in later prehistoric and Roman times. This site could therefore contribute to understanding that process in the hinterland of Londinium. Previous developments on the site are expected to have caused some harm but archaeological remains may survive away from the buildings. The proposed development will involve major groundworks across the site which would likely remove most or all of any surviving remains.

In this instance GLAAS have advised that the development could cause harm to archaeological remains and field evaluation is therefore needed to determine appropriate mitigation. In order to establish if any remains are present a two stage archaeological condition has been requested.

It is considered that a condition as recommended by GLAAS (full text above in the External Consultee section) could be attached to any consent granted in association with this application to secure the implementation of a programme of archaeological work could make the proposed development acceptable in Archaeological terms in line with Policy DMHB 7 of the Local Plan Part 2: Development Management policies (2020), Policy 7.8 of the London Plan (2016), draft Policy HC1 of the London Plan (Intend to Publish (Dec 2019)) and the NPPF (2019).

## HERITAGE ASSETS

Paragraph 196 of the NPPF 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.

London Plan Policy 7.7 says that the impact of tall buildings proposed in sensitive locations

should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

Draft Policy HC1 of the London Plan (Intend to Publish (Dec 2019)) also seeks to protect heritage assets and their setting.

Policy HE1: (Heritage) of the Local Plan: Part 1 - Strategic Policies (2012) says that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.

Policies DMHB 1 (Heritage Assets), DMHB 2 (Listed Buildings), DMHB 3 (Locally Listed Buildings) and DMHB 4 (Conservation Areas) of the Local Plan: Part 2 - Development Management policies (2020) all seek to protect heritage assets and their setting.

The site does not fall within a Conservation Area or Area of Special Character. The closest Conservation Areas are Ickenham Village to the north and Hillingdon Court Park to the south. Nearby Listed Buildings include Long Lane Farm Cottages (Grade II listed), the garden walls to the east of Manor Farm House (Grade II) and Ickenham Manor (Grade I) all of which are located to the north. Also to the north is Ickenham Manor Farm which is a Scheduled Monument. Public rights of way provide public access to the wider area.

Having regard of the submitted TVIA and associated Addendum report, the Council's Design and Heritage officer made the following observations:

'There is a hedgerow / treeline that runs along the southern curtilage boundary of the listed buildings. Currently there are glimpse views from the property through the boundary towards the site due to the lack of foliage during the winter months. The proposal will therefore have some negative impact on the setting of the Grade I listed house. This could be made worse if the foliage was ever to be removed, reduced or thinned out. Ickenham Manor has always been situated in a rural setting and the southerly views from the house and surrounding curtilage help to reinforce this important character as they overlook surrounding farmland which is enclosed with verdant hedge and tree lines. The southerly views from Ickenham Manor would therefore be harmed by the construction of the proposed development as the buildings would extend up above the tree line on the horizon. The harm to the setting of the Grade I listed building would be considered less than substantial. The impact would be reduced during the spring / summer months by the trees along the southern curtilage, assuming they are not removed.

With respect to the Ickenham Conservation Area Views 10 and 11 demonstrate that the new development would be seen in views looking towards the site. The proposed development would extend up above the ridgelines and visually infill gaps between houses. Although the views of the TVIA are static it would appear that the development would likely to be visible in a number of kinetic views as one moves through the conservation area as well as from the windows of houses and from rear gardens. One of the strong characteristics of the conservation area is the uninterrupted skyline of hipped roofs and the softening effects of street and privately owned trees. The enjoyment of this roofscape is likely to be affected and as a consequence there will be harm to the setting of the conservation area. The harm would be considered less than substantial.

Many of the other views in the TVIA illustrate the developments impact on the townscape and confirm that it would be a discordant and incongruous development within this modest suburban setting of buildings of two and three storeys.

The longer distance views also demonstrate harm. In particular views 13 and 15 show the development extending up prominently above the tree line whereas the existing established development of the surrounding area is kept well below the treeline retaining a largely uninterrupted skyline of tree canopies which make a positive contribution to the area'.

In summary, the TVIA, which includes some views which have not previously been presented to the Council in other applications lodged at this site, has demonstrated that there will be views of the development from the heritage assets at Ickenham Manor and from within the Ickenham Conservation Area and it is considered that the negative impact of these views will be exacerbated by the height and bulk of the development and the continuous wall of approx 150m which runs along the northern elevation of the site. Having regard to guidance set out in the NPPF, the impact of the development on the setting of these heritage assets is considered less than substantial.

It is not considered that the development enhances or better reveals the significance of the designated heritage assets and the proposed development is considered to represent less than substantial harm to these heritage assets. The NPPF states that where a development will lead to less than substantial harm, as is the case in this development, this harm should be weighed against the public benefits of the proposals. It should be noted that the distance of the development from the heritage assets does diminish the harm caused. Of more concern is the impact on the Green Belt and surrounding streetscape of North Hillingdon Centre, which will be more significant. The development is deemed to be delivering public benefits (in particular affordable housing and public open space) which are discussed elsewhere within this report which are considered to outweigh the less than substantial harm to the specific designated heritage assets of Ickenham Manor and the Ickenham Conservation Area.

Notwithstanding these comments regarding heritage assets, matters relating to the impact upon views and skyline are assessed in greater detail in section 7.07 within this report.

#### **7.04 Airport safeguarding**

The application site relates to land approximately 1.5km west of RAF Northolt and falls within the statutory height, birdstrike and technical safeguarding zones surrounding RAF Northolt. The site also falls within the safeguarding zones of Heathrow Airport, located to the south of the application site.

Policies DMAV 1, DMAV 2 and DMAV 3 of the Local Plan Part 2; 2020, seek to support the continued safe operation of both Heathrow Airport and RAF Northolt. Statutory bodies including the Ministry of Defence, NATS and BAA have been consulted and all parties have raised no objections, subject of the imposition of suitable conditions.

The MOD has raised no safeguarding objections regarding the proposed building heights for this development.

The application site is also within the birdstrike safeguarding zone, within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.

Several of the buildings are proposed to have brown or green roofs of varying design and

the drainage strategy for the site includes green roofs, permeable paving, rain gardens and swales. The developer has submitted a Bird Hazard Management Plan (BHMP) to mitigate any potential birdstrike risks / hazards. Having reviewed the plan the MOD confirmed that the provisions set out within the BHMP would provide a robust and effective mitigation of the risk posed by the development, and requested that any permission be issued subject to a condition requiring that the development is carried out strictly in accordance with the submitted BHMP and that those measures set out within the BHMP are implemented in perpetuity.

In summary as long as the swales are generally dry and the BHMP is included as a conditional requirement (and in perpetuity) as part of any planning permission granted, the MOD has no objections to this development.

Any Cranes required during construction have the potential to affect the performance of the Precision Approach Radar (PAR) and therefore air traffic safety. To ensure that the MOD is notified of when and where cranes would be erected the submission of a construction management strategy should be secured by way of condition in the event planning permission were granted (see suggested wording above in the Statutory Consultee section above).

In summary, subject to the inclusion of the recommended conditions there is no safeguarding objection to this application in accordance with policies DMAV 1, DMAV2 and DMAV3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

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

Paragraph 133 of the NPPF says that 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.

London Plan Policy 7.16 says that the strongest protection should be given to London's Green Belt, in accordance with national guidance. London Plan Policy 7.7 says that the impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of Local Plan: Part 1 - Strategic Policies (2012) says that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.

Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

Policy DMEI 6 of the Local Plan Part 2 (2020) specifically 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.

This site is adjacent to the Green Belt (Freezeland Covert) to the east, across the Western Avenue/A40 corridor to the north and to the west. Whilst the site is not within the Green

Belt, it does lie between significant wedges of Green Belt countryside, and it is therefore important to ensure that the visual amenity of those areas is not detrimentally affected by the proposal.

The Green Belt contributes strongly to the local distinctiveness of the area and the street scene along Western Avenue/M40. It is considered important to retain that special open, rural character, as this road provides one of the main access routes to and through Hillingdon.

The Townscape & Visual Impact Assessment (TVIA) which has been submitted as part of the application clearly demonstrates the likely impact of the development on views from within the Green Belt and open countryside. In particular views from the west (View 13) and from the north (Views 1 and 15) and given the scale of the development it is considered to have a detrimental impact on those views and on the openness of the Green Belt and open countryside.

In summary, the development itself, primarily because the site is not within the Green Belt, does not conflict with paragraph 133 of the NPPF, policy DMEI 4 of the Hillingdon Local Plan Part 2- Development Management Policies (2020), policy E2 of the Local Plan Part 1 and Policy 7.16 of the London Plan Part 1 (2012) as the development is not within or encroach onto any Green Belt designated land.

However, due to the proposed building height and scale and the proximity of the buildings so close to the site boundary with only very little landscape screening, the development creates a detrimental visual impact when viewed from the wider area and specifically from the Green Belt when viewed from the north and west, which arises primarily because of the height and continuous wall of development along the northern and western boundaries. In particular the long distance views from the west (view 13) are considered to be important, as they form part of the setting of the Green Belt and open countryside which currently benefits from far reaching views of Harrow and London.

## **7.06 Environmental Impact**

### **GROUND CONTAMINATION**

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 (Development of Land Affected by Contamination) of the Local Plan: Part 2 - Development Management Policies (2020) says that the Council will support planning permission for 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 used through remediation. This is supported by Policy 5.21 of the London Plan (2016).

A geo-environmental risk assessment has been submitted in support of the application. Despite the Pollutant Linkage Assessment within the report indicating a generally low risk, (low to moderate risk in terms of the made ground), of significant contamination across the site, there are however areas associated with underground tanks and reservoir where uncertainty exists.

In light of the findings of the site investigations and advice from Environment Protection Unit, had the application been acceptable in other respects, a condition would have been recommended, requiring a site investigation and a scheme to deal with contamination including a remediation method statement. The Council's contamination officer's full comments can be found above in the Internal Consultee section.

On this basis, it is considered that the impact of the development on ground contamination can be mitigated in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan Part 2: Development Management Policies (2020) and Policy 5.21 of the London Plan (2016).

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

Paragraph 127 of the NPPF (February 2019) 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.

Policies D1 and D4 of the draft London Plan - Intend to Publish (December 2019) states that development design should respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions and 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. Developments should also aim for high sustainability standards and also respect, enhance and utilise the heritage assets and architectural features that make up the local character. Proposals should provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water. Development should achieve comfortable and inviting environments both inside and outside buildings.

Policy DMHB 10 (High buildings and structures) of the Local Plan: Part 2 - Development Management Policies (2020) says that proposals for high buildings or structures will be required to respond to the local dominant context and should (amongst other things):

- i) be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings; and
- ii) be located in an area of high public transport accessibility and be fully accessible for all

users; and

iii) be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context.

Paragraph 3.9.3 of the draft London Plan - Intend to Publish (December 2019) states that tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. The proposed development is considered to constitute a tall building as it is substantially taller than its surroundings of 2/3 storey development.

The proposed tall buildings are considered to be contrary to the above policy in that they would not be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for a high building and would be located in an area with a low PTAL (Level 2-3) and would also be of a height, form, massing and footprint which is considered to be out of proportion to its location, adjacent buildings and the wider townscape context.

For these reasons the site is not considered an appropriate location for tall buildings and allowing tall buildings in this location would be contrary to Policy DMHB 10 (High buildings and structures) of the Local Plan: Part 2 - Development Management Policies (2020), policy BE1 of the Local Plan Part 1 (2012), policies 7.6 and 7.7 of the London Plan (2016) and policies D1, D4 and D9 of the draft London Plan - Intend to Publish (December 2019) and the NPPF.

Policy DMHB 11 (Design of new development) of the Local Plan: Part 2 - Development Management Policies (2020) says (amongst other things) that development will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
  - scale of development, considering the height, mass and bulk of adjacent structures;
  - building plot sizes and widths, plot coverage and established street patterns;
  - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
  - architectural composition and quality of detailing;
  - local topography, views both from and to the site; and
  - impact on neighbouring open spaces and their environment.

Policy 7.4 of the London Plan (2016) says that buildings, streets and open spaces should provide a high quality design response that:

- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- e) is informed by the surrounding historic environment

Hillingdon Circus comprises predominantly 2/3 storey buildings with commercial uses on the ground floor fronting Long lane and residential uses above. The wider area to the north and south is characterised by two storey houses. To the west there are some three storey

flats (Aurial Drive) with one new development at Hercies road which has a fourth storey set back from the road. The area is suburban in character with open land to the north of the site on the other side of the M40 and open space to the east at Freezeland Way.

The proposed development at 11 storeys is considered to be out of keeping with the existing scale and suburban character and as it greatly exceeds the height, scale and massing of locality, the development would be incongruous within the townscape setting and also the wider landscape surroundings. This is contrary to Policy DMHB 11 (Design of new development) of the Local Plan: Part 2 - Development Management Policies (2020).

For the reasons set out above, the proposed development does not represent an appropriate scheme that integrates with the existing surrounding area contrary to policy 7.4 of the London Plan (2016).

Policy BE1 of the Local Plan: Part 1 - Strategic Policies (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

The scheme proposes a 150m continuous 'wall' of development along the perimeter to the north which then wraps around to the west along Long Lane for a further 30m. There is a change in levels along the northern portion of the site at its boundary with Long Lane and no pedestrian or vehicular links are proposed here. To the southeast of the site is a parcel of land which is not in the Applicants' control and so no links are proposed here. This results in an 'island' type development which would be segregated from the wider area.

Although it is acknowledged that the development has been designed to reduce the impact on the proposed residential units of the prevailing hostile noise and air quality environments around the A40. The resultant continuous ribbon of development, comprising Blocks 5, 6, 7, 8, & 9 which includes the taller buildings, with no breaks is considered to have significant detrimental visual impact on the locality and also wider views. Furthermore, the development has failed to demonstrate that it is acceptable in terms of noise and air quality (as discussed in more detail in the relevant sections).

The outer walls of the development would rise up dramatically above the existing buildings in the locality to the extent that they would appear completely out of scale. The presence of the 11 storey tower block, contributes to a development that would completely overwhelm its immediate surroundings. The siting of the buildings close to the boundaries is expected to compound the impact of the development and the potential harsh canyon like pedestrian environment at ground level.

In addition, the lack of landscaping around the perimeter of the site, primarily the northern and western boundaries compounds the impact of the scale of this development in wider views around the site. The development has maximised the extent of site coverage to the detriment of providing any real relief or setbacks to provide higher quality landscaping to minimise the harm caused by the proposed development on the local and wider street scene and views of the site.

Overall, it is considered that the development, by virtue of its overall scale, height, bulk and massing, density, site coverage and lack of landscaping and screening, constitutes an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of



the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the adjoining Green Belt and would mar the skyline, contrary to Policies BE1 and EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMHB 10, DMHB 11, DMHB 12, DMHB 14, DMHB 17, DME1 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part Two - Site Allocations and Designations (2020), Policies 7.4, 7.6, 7.7 of the London Plan (2016), Policies D1, D3, D4, D8 and D9 of the London Plan (Intend to Publish version 2019) and the NPPF (2019).

## **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 7.7 of the London Plan (March 2016) and Policy D8 of the draft London Plan - Intend to Publish (December 2019).

In this case there are no residential properties that directly abut the site. The nearest residential properties are in Freezeland Way on the opposite side of the road. Buildings 1, 10 and 12 are the closest buildings and would maintain a separation distance of least 38 metres from the existing properties on the south side of Freezeland Way. It is not considered that there would be a material loss of daylight or sunlight to neighbouring properties, as the proposed buildings would be sited a sufficient distance away from adjoining properties.

### **Privacy**

The supporting text for Policy DMHB 11 (Design of New Development) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) states that 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.

The nearest residential properties are in Freezeland Way on the opposite side of the road, which are at least 38m from the proposed development. It is considered that the relevant minimum overlooking distances can be achieved, as the proposed building would be sited a sufficient distance away from adjoining properties. In addition, boundary treatment is could be secured by condition.

It is not therefore considered that the proposal would result in a loss of residential amenity to the nearest existing residential occupiers, in compliance with the relevant sections of Policy DMHB 11 and Appendix A of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

It should be noted that the southernmost block (Building 12) has been set back 13m from the southern boundary of the application site (adjacent to the Council owned land to the south). Should a similar residential development on the Council land be forthcoming, with a

similar setback from the common boundary, then adequate separation distances could be achieved to ensure there is no adverse impact on residential amenity of future occupiers of both sites. As such, it is not considered that the development potential of the adjoining Council Land would be prejudiced by the current proposals.

In summary the proposed development is not expected to have an adverse impact on the existing residential amenity of surrounding properties with regards to overlooking, privacy, daylight or sunlight. An assessment of the quality of the proposed residential units is set out below in the relevant section (Living conditions for future occupiers).

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

### **EXTERNAL AMENITY SPACE**

Policy DMHB 18 (Private Outdoor Amenity Space) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all new residential development to provide good quality and usable private amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.2 which are as follows:

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

1 bedroom house - 40 sqm per house  
2 bedroom house - 60 sqm per house  
3 bedroom house - 100 sqm per house

Given the current proposed unit mix, a total of 12,130 sqm of private amenity space is required to meet the requirements of Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) through private balconies, private gardens and communal amenity space for the use of residents only.

The proposed development provides 493 sqm of private amenity in the form of ground floor amenity and roof terraces and would provide a further 3,162 sqm of private amenity space in the form of balconies/internal amenity. Podium level space (communal) equates to 2821 sqm. Therefore the total private amenity space provision would be 6,476 sqm. This is below the 12,130 sqm of private amenity space required by Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the application is recommended for refusal on this basis.

Policy DMHB 18 (Private Outdoor Amenity Space) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) also specifies that private balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres and that ground floor units should have defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room.

In this regard all of the proposed balconies comply with these space standards. 26 of the 27 ground floor units have a private terrace/garden area and 20 of these have a clear 3m of defensible space in line with the standards set out above. The remaining six units are located in areas where the defensible space could be increased to 3m. Although this has not been made clear on the submitted drawings, it is considered to be something that could be secured and resolved by way of condition.

34 units out of 514 units do not have a private balcony or terrace. Paragraphs 2.3.32 -

2.3.33 of the Mayor's Housing SPG (2016) does allow, in exceptional circumstances for some developments to provide a proportion of dwellings that cannot provide private amenity space to provide those dwellings with additional internal living space equivalent to the required amenity space. In other words, balconies have been replaced with bigger lounges. The proposed development has achieved this in all units which have not provided a private balcony or terrace area.

In summary, given the lack of private amenity space, the proposed development fails to meet the requirements of policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and is therefore recommended for refusal on this basis.

## PUBLIC OPEN SPACE

Policy G4 of the draft London Plan (December 2019) states that development proposals should:

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

Policy DMCI 4 (Open Spaces in New Development) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) encourages proposals for major new residential development to make provision for new open space, or enhancements to existing open space and says that proposals that fail to do will be resisted. In this regard the Applicant states that 9,779 sqm of public amenity space is provided. The public open space would be provided in the following main areas:

Central Parkland = 1907 sqm

Natural edge (between Buildings 11 and 12) = 1332 sqm

Main arrival square = 1573 sqm

The quality and quantity of the proposed public open space proposed within the development is considered to provide new open space which would be of benefit to the existing and future residents of the site and surrounding area. The proposed public open space accords with Policy G4 of the draft London Plan (December 2019) and Policy DMCI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## CHILDREN'S PLAY SPACE

Policy DMHB 19 (Play Space) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all developments which result in an occupancy of ten or more children to provide children and young people's play facilities on-site.

Using the 'SPG play space requirement calculator' which allocates a GLA benchmark of 10 sqm of dedicated play space per child, a total of 2,285 sqm play space is required. The proposed development provides the following dedicated play space in accordance with the SPG.

Total play area = 2,285 sqm

0 - 5 dedicated formal / informal play area = 1,156 sqm

5 - 11 dedicated formal / informal play area = 700 sqm

12+ informal play space = 429 sqm

Based on the above figures, the proposed development is considered to provide policy compliant children's play spaces in accordance with policies DMHB 19 of the Local Plan Part 2 (2020) and the GLA Children's Play Space SPG.

## INTERNAL SPACE STANDARDS

Policy 3.5 of the London Plan requires new development to be of the highest quality both internally and externally. Table 3.3 of the London Plan, together with the Mayor's Housing Standards and National Space Standards set out the internal size requirements for residential accommodation. Policy DMHB 16 (Housing Standards) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) reiterates these space standards.

The Schedule of Accommodation demonstrates that:

- All the one bedroom units meet or exceed the minimum of 51 sq. m for a one bedroom, 2 person, single storey dwelling;
- All the two bedroom units meet or exceed the minimum of 61 sq.m for a two bedroom, 3 person, single storey dwelling, and the minimum of 70 sq.m for a two bedroom, 4 person, single storey dwelling
- All three bedroom units are in excess of the minimum 86 sq. m requirement for a three bedroom, 5 person, single storey dwelling, or 93 sq m over 2 storeys.

The proposed development therefore accords with relevant policy requirements regarding internal space standards and would provide a range and mix of unit sizes, including some three bedroom units, to help meet the requirement for family housing in the borough.

It is therefore considered that the information in the submitted plans and documentation, including the planning statement and design and access statement illustrate that standards have been achieved, in accordance with London Plan Policies 3.5 and Policy DMHB 16 (Housing Standards) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

## PRIVACY AND OUTLOOK

DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) set out design guidance with regard to new and existing development. The guide says that a minimum separation distance of 21 metres is required to avoid overlooking and loss of privacy.

The separation distances of buildings within the site are 21m in all cases with the exception of Building 10 with Building 11 to the east and Building 10 with Building 12 to the east. Here the distance is 15m which is deemed acceptable as Building 10 faces the side elevation of buildings 11 and 12.

The application submission has also demonstrated that there are adequate set backs provided (a minimum of 13m from the main facade at Building 12) along the southernmost boundary of the application site, where it adjoins the remaining land parcel within site B to ensure that this site could come forward in isolation without being prejudiced by the current proposals.

It is therefore been considered that the design of the development would protect the privacy of future occupiers, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

## DAYLIGHT AND SUNLIGHT

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says that 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".

Policy DMHB 11 (Design of New Development) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) seeks to protect the amenity, daylight and sunlight of existing properties and open space. Policy DMHB 10 (High Buildings and Structures) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) says that proposals for high buildings should (amongst other things) not adversely impact on the micro climate (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.

Draft policy D6 of the London Plan (Intend to Publish (Dec 2019)) states that development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

In this regard a (Robinson) Daylight and Sunlight Assessment has been submitted as part of the application. The report has been assessed by external consultants (LSH) on behalf of the Council and the Applicant was given the opportunity to respond. The Applicant's response was subject to further review by external consultants (LSH).

The assessment and review considered that the development would not have an adverse impact on nearby properties in terms of overshadowing as a result the proposed development and the proposal is considered acceptable in this regard.

The assessment also reviewed the expected levels of Daylight and Sunlight within the proposed development. In summary the review carried out by external consultants on behalf of the Council provided the following conclusions:

### Window Transmittance and Surface Reflectance

The main issue with the values used in the Assessment relate to the chosen glazing system being high end glazing units. If this type of glazing is used within the development, then the results for daylight will be as per the Robinson report. However, if high end glazing units are not used in the development, then the results would be more detrimental to daylight results. A condition requiring the high end glazing units should therefore be applied to ensure the daylight results are achieved.

Furthermore, it is noted that kitchens have not been assessed which is expected to improve the overall result in terms of Daylight received. The BRE guidance states (2.1.14) non-daylit kitchens should be avoided where ever possible.

The Robinson analysis shows that 310 of the rooms fall short of the target values, of these, 224 are bedrooms. The BRE guidance recognises that daylight is less important in bedrooms. However there is an additional 86 rooms which fall short of acceptable levels.

Overall the results of the Daylight and Sunlight Assessment are concerning and reinforce Officer's views that the proposed development would result in an overdeveloped site to the detriment of future residents.

#### Sunlight

In terms of Sunlight, the Robinson report has analysed Sunlight using room results rather than windows (for APSH). Using windows would be in line with the BRE guidance and RICS guidance note. Using room results would be more favourable than window results.

The Robinson response states that this method was accepted by Hillingdon in the previous application. However, it is considered that each application should be assessed on a case by case basis and in this regard the assessment should be carried out in accordance with the BRE guidance and RICS guidance note. Insufficient information has therefore been provided with regards to the Sunlight assessment.

In summary, the Applicant has failed to demonstrate that the proposed development would provide adequate levels of Daylight and Sunlight to the detriment of the future residential amenity contrary to policies DMHB 10 and DMHB 11 and Paragraph 5.41 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and draft policy D6 of the London Plan (Intend to publish (Dec 2019)).

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

Section 9 of the NPPF says that plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people; and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The NPPF also says that developments should be located and designed where practical to give priority to pedestrian and cycle movements; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.

TfL is the highway authority for A40 Western Avenue, while Hillingdon Council is responsible for the rest of the road network in this area. TfL buses operate on Long Lane.

Policy DMT 1 (Managing Transport Impacts) of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. Policy DMT 2 (Highways Impacts) of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) seeks to minimise the impact on the surrounding highway with regards of traffic, air quality, noise, local amenity and safety. Policy DMT 6 (Vehicle Parking) of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) says that development proposals must comply with the parking standards outlined in Appendix C Table 1. Policy 6.3 of the London Plan requires development proposals to ensure that the impacts on transport capacity and the transport network are fully assessed. In this regard a Transport Assessment (TA) has been submitted in support of this application.

Policy 6.13 of the London Plans says that the maximum standards set out in Table 6.2 should be the basis for considering planning applications, informed by policy and guidance below on their application for housing in parts of Outer London with low public transport

- accessibility (generally PTALs 0-1). In addition, developments in all parts of London must:
- a ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
  - b provide parking for disabled people in line with Table 6.2
  - c meet the minimum cycle parking standards set out in Table 6.3
  - d provide for the needs of businesses for delivery and servicing.

The Highway Engineer has conducted an extensive review of the TA which is included in the 'Internal Consultees' section of this report.

#### RESIDENTIAL DEVELOPMENT-PARKING

The 514 residential unit component of the application consists of the following:-

- 221 - 1 bedroom flats
- 216 - 2 bedroom flats
- 77 - 3 bedroom flats

The site has a Public Transport Accessibility Level (PTAL) of both 2 and 3 where 6 is high. Table 6.2 of the London Plan sets a maximum car parking standard of 1.5 space per unit for developments within areas with a PTAL rating of between 2 and 4. The supporting text to Policy 6.13 of the London Plans says that 'In outer London a more flexible approach for applications may also be acceptable in some limited parts of areas within PTAL 2, in locations where the orientation or levels of public transport mean that a development is particularly dependent on car travel'. This part of Hillingdon is considered to require higher levels of car parking given the likely trips and destinations in the context of the limited public transport options.

The Council's Highways Team have been consulted on the proposed parking provision and have noted that a total of 154 on-plot residential spaces are proposed which equates to a ratio of between 0.3-0.36 spaces per dwelling which are arranged at surface and with the podiums across the site.

It is acknowledged that the Greater London Authority (GLA) have accepted a ratio ranging from approximately 0.3-0.36 per flatted unit. However this unprecedented low parking ratio would normally be considered for areas akin to more sustainable main or 'edge of' town centre locations which are better placed to accommodate such a lower level of provision.

Utilising the Hillingdon Local Plan standards, the recommended maximum quantum would be in the region of 591 spaces. However in the spirit of compromise between the regional and local parking standards and LBH advice afforded at the pre-application stages for the aforementioned prior applications including the current iteration, encouraged a 1:1 parking ratio per unit which would equate to 514 spaces. This would assist in limiting undue and detrimental parking displacement onto the local highway network.

The proposal therefore significantly falls short of the Local Plan Policies which favour a higher parking provision given the site's Outer London borough status and the modal choice challenges this brings for Hillingdon's residents, both incumbent and new occupiers, who need to travel to destinations extraneous to Greater London (GL) by using convenient major road links such as the M4, M25 and A40/M40 corridors. Such travel choice by private motor car is mainly due to the expensive and inconsistent availability of public transport nodal links outside of London. This is reinforced by census data (2011) which indicates that Hillingdon exhibits one of the highest car ownership rates per household in London and a commensurate increase in this trend is anticipated since the

collation of census data in 2011. The private motor vehicle would therefore be likely to remain as the main dominant mode of travel choice for many new residents by reason of need and convenience for the foreseeable future.

Notwithstanding the above and as highlighted earlier, the need to encourage sustainable modal travel choice is acknowledged on a local, regional and national level hence in the spirit of compromise between the regional London Plan and local Hillingdon parking standards, an on-plot parking ratio between 0.75-1 space per dwelling in lieu of the proposed average 0.3 per unit ratio could be favoured.

The proposed total quantum of 164 spaces (including residential, disabled compliant, visitor and car club provisions) is considered unacceptable as there would be a heightened potential for detrimental parking displacement onto the highway network.

The current application proposes to provide 4 car club spaces to serve the location with 3 years free membership to be provided for each dwelling upon first occupation. Whilst the delivery of car club spaces on site is welcomed, the success of car clubs within the LB Hillingdon has not been of great success in recent years. The Council has seen numerous applications to remove planning obligations which sought to secure car club bays in large scale developments, primarily because car club operators failed to occupy the spaces secured on site. The likely success of car club bays can therefore only be treated as a minimal benefit based on the most recent experience of the Local Authority.

Were all other matters deemed to be acceptable, the delivery of car clubs would have been secured as a planning obligation, albeit the Local Planning Authority do not agree with the applicants claims that each car club bay could replace 20 privately owned vehicles. A more realistic assumption would be that, should a car club operator take the spaces, each bay is only likely to replace the minimum 6 privately owned vehicles.

Electric Vehicle Charging Points (EVCP's) are proposed on site at a ratio of 20% active and 80% passive spaces, which accords with the emerging London Plan policy T6.1 (intend to Publish Version 2019) and is supported and could be secured by way of a planning condition.

In line with draft London Plan standards, the application proposes a provision of 918 secure and accessible spaces in total for residents and visitors located throughout the site, including within a 'cycle hub,' which is acceptable in format and design layout terms and the quantum conforms to and exceeds Hillingdon's Local Plan policy DMT 5 standard which would require a figure in the region of approximately 591 spaces.

Whilst the quantum of cycle parking far exceeds the LBH standards, the provision does accord with the draft London Plan standards and is therefore deemed to be acceptable. It is considered that a cycle parking review. This matter could be secured by condition to acquire secure and covered cycle parking on-site. The development also proposes 8 motorcycle spaces on site which also accords with the Councils standards and could again be secured by condition.

#### COMMERCIAL USES; PARKING (Use Class B1/A1/A3/D1)

The applicant is proposing a zero parking provision for the flexible commercial elements which would total an overall scale of 1214 sqm GIFA. In accord the Local Plan a total of up to 48 spaces would normally be required for this level of scale with a suitably apportioned



GIFA. The applicants claim that, demand will be very local to the development and public transport/pedestrian based which includes patronage by new occupiers of the address. Hence car borne demand is predicted to be relatively low to non-existent. On this premise the proposals includes no parking provision for the 'commercial' component. Policy E5 of the Hillingdon Local Plan Part 1 (2012) does state that an appropriate level of parking provision should be provided to ensure adequate accessibility to local services and amenity. Failure to provide adequate parking is likely to prejudice the vitality and viability of the proposed commercial units. Even if the Council were to accept the applicant's provision, given the isolated nature of the site and the need to travel to the premises by private car, the proposals are likely to further exacerbate overflow parking on the local roads to the detriment of pedestrian and highway safety.

The Local Planning Authority accept that the proposed development would in theory leave 6 generic visitor spaces which could be used by visitors to the commercial premises, however these spaces are allocated to visitors of the residential properties which may be occupied by visitors 100% of the time, given the scale of this development of over 500 units. The management of these spaces to be shared by visitors to the residential and commercial premises would be difficult to impose and highly unlikely to be enforceable by the Local Planning Authority. The lack of commercial parking therefore fails to accord with policy E5 of the Local Plan Part 1 (2012) and policy DMT 6 of the Local Plan Part 2- Development Management Policies 2020.

The proposed development includes provision of 8 long stay & 32 short stay spaces for the 'flexible' B1/A1/A3/B1 uses. Whilst this is marginally below the LBH parking standards, the proposals do meet the London Plan standards and are therefore deemed to be acceptable and could have been secured by way of a planning condition.

Notwithstanding the Councils position with regard to insufficient provision of on-site car parking for both the residential and commercial premises, the applicants have proposed to impose a privately imposed parking management strategy which is welcomed and supported, however full and clear detailed information with regards to the enforcement of this would need to set out and approved by the Planning department. However the Councils concerns of indiscriminate parking extend beyond the application site boundary and are likely to cause harm on surrounding adopted roads. Whilst the Planning department consider it to be essential to secure, as part of the legal agreement, a clause to prevent future residents and businesses securing a council parking permit to park on the local highway. However the restrictions on these local roads do not prevent car parking outside of the controlled hours and it is this indiscriminate parking that is deemed to cause pedestrian and highways safety concerns.

Whilst the Highways Officers have requested a contribution of £20,000 for contingency, which would be used to mitigate any harm identified, this contribution would not overcome the primary reasons for refusal.

#### Traffic Modelling Outcomes

In traffic capacity terms, the current baseline scenario indicates that the Hillingdon Circus signalised junction operates at and above capacity, both in the am and pm peaks thus creating undue traffic queuing and resultant congestion at the junction and surrounding road network. The proposal combined with nearby committed developments would clearly exacerbate this position creating a scenario whereby the junction could potentially be inflicted with traffic levels well above operational capacity resulting in greater vehicle queue lengths and associated delays which understandably raises concern.

Furthermore, the Applicant estimates HGV movements generated by the HS2 construction (commencing from autumn 2020) at approximately 18 HGV's per day to traverse through Hillingdon circus with an imposition of 3 vehicles during the am & pm peak hours. Although it is anticipated that there will be peaks and troughs in HS2 linked construction activities, the official estimation by HS2 Ltd of, for example, HGV activity linked only to the new portal at the Ruislip Golf course located further north of the MB site in Ickenham Road is officially anticipated at 120-140 daily two-way trips within HS2's 'main works' Local Traffic Management Plan. It is expected that a high proportion of these vehicles would route through Hillingdon Circus and as HS2 Ltd cannot guarantee avoidance of peak traffic periods this would infer a significant under-estimation by the applicant.

General HS2 Ltd activity generated by other work sites in the borough would also add measurable burden to the junction during and outside of peak traffic periods well into the second half of the next decade. It is therefore considered that the 'real world' level of imposition would add significant traffic burden which is especially concerning in the light of the signalled junction running at/beyond working capacity during peaks at present. The applicant has not factored this aspect into their analysis on the premise of identified traffic reduction measured in 2019 which would therefore absorb HS2 Ltd activity. This is not considered as an acceptable course of analysis.

#### Traffic generation

In traffic impact terms, the acceptability (or otherwise) of a development proposal is summarised within Paragraph 109 of the NPPF which states "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". This approach has therefore been applied by the Highways Engineer throughout his comments.

It is considered that the applicant has underestimated both am and pm peak vehicle trip generation in the TA and hence, where applicable, a higher percentage traffic flow growth than depicted in the TA would be expected in reality.

In summary, unless substantive highway mitigation and highway gain can be achieved, the proposal is considered unacceptable on traffic generation grounds. The applicant has indicated willingness in providing some highway enhancement/financial contribution in an attempt to mitigate development impacts mainly focused on improving the pedestrian environment, public transport facilities together with highway improvements related to improving site access and egress. However, the Local Planning Authority consider that the applicants failure to provide an accurate TA does not allow for a full assessment of the potential impacts and thus it is not possible to ascertain if mitigation is required.

The application fails to demonstrate that the proposal would not result in an unacceptable rise in traffic around the application site causing severe impacts to the free flow of traffic as well as to highway and pedestrian safety. This overall conclusion falls in line with Para. 109 of the NPPF in specific regard to the appropriateness of refusing development based on the residual cumulative impacts on the road network which, in this case, are considered severe.

#### Development Footfall

It is a normal requirement for this scale of residential development to be accompanied by a Pedestrian Environment Review System (PERS) audit in order to provide an inventory of local pedestrian facilities thereby allowing an informed determination of the suitability of the local highway network to be made in order to cater for the uplift in foot traffic generated by a

proposal. The applicant has not provided this audit however a study was previously submitted for the refused 437 unit scheme which indicated 64/49 additional pedestrian movements are predicted for the am & pm peaks respectively. Clearly with the uplift in unit numbers from 437 to 514 this prediction would increase. However the original numbers were considered as a gross underestimation given that the overall proposal could potentially house somewhere in the region of 1000 new residents. Notwithstanding this point, as is the norm, pedestrian footfall would cumulatively increase and be distributed throughout the day and evening periods so any projected footfall uplift, whether it be at peak or any other time of the day, would impinge on the public realm creating additional demand on the public realm i.e. footway and road crossing infrastructure.

The Highways Engineer has identified some physical deficiencies within the existing footway network and pedestrian provisions at Hillingdon Circus. However in the absence of information submitted for this application, it is not known what potential mitigation is required to secure pedestrian improvements to the public realm.

#### PUBLIC TRANSPORT

TfL have identified the need for a new bus service which runs north to south in the Borough. As such a contribution of £1,365,000 for this bus route has been requested, which the applicants have agreed to provide. In addition, a contribution of £30,000 towards bus priority measures has been requested and agreed by the Applicant. It should be noted however that the Local Planning Authority do not deem the above contributions to be sufficient to address or mitigate the objections raised earlier in this report.

#### CONCLUSION

In conclusion, the proposed development cannot be supported due to its impact on highway and pedestrian safety and the free flow of traffic.

It is noted that a number of mitigation measures have been identified by the Council's Highways engineer and also TfL, however it is not known, due to a lack of information, whether the mitigation proposed, either individually or cumulatively could in fact mitigate against any harm, as the applicant has failed to provide such information.

In the event that this application were approved by a future planning inspector, it is however considered imperative to secure the following works which could go some way to alleviating harm caused by the development, however this list of obligations does not preclude the position that this development is unacceptable.

A s278 and/or s38 agreement will be entered into to address any and all on site and off site highways works as a result of this proposal. These include the following:

- Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities
- Improved pedestrian and cycling facilities throughout the signalled junction.
- Potential improvements to the service road approach in Freezeland Way (fronting the site).
- The creation of a new public realm 'Gateway' fronting the site on Freezeland Way.
- Enhanced bus stop provisions for the 'Oxford Tube' bus service,
- Monitoring of signal optimisation @ Hillingdon Circus,
- Contingency monies to remedy any parking displacement onto the public highway (£20,000),
- Review of local public lighting, road signage and marking provisions,
- Carriageway (including roadway anti-skid review) and footway condition surveys with

remedial work where applicable.

- Implementation of vehicle actuated speed signs (up to a cost of £5,000).

(ii). Public Transport Infrastructure:

A 5 year public transport contribution toward a new bus service (£455,000 per annum totalling £1,365,000).

Bus priority measures (£30,000)

(iii). Travel Plan initiatives/incentives with a financial performance bond (£20,000)

(iv) Construction Logistics Plan (CLP) and Service Delivery Plan (SDP)

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

In terms of urban design, Policies 7.4, 7.5, 7.6 and 7.7 of the London Plan (March 2016), Policies D1 and D2 of the draft London Plan - Intend to Publish (December 2019), Policies DMHB 1, DMHB 10, DMHB 11, DMHB 12, DMHB 13, DMHB 13A, DMHB 14, DMHB 15, DMHB 17, DMEI 1, DMCI 2, DMCI 3, DMCI 4, DMCI 5 and Appendix A of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) and Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) and Site specific policy SA14 of the Local Plan: Part 2 -Site Allocations and Designations (2020) are considered relevant.

Issues relating to impact on the Green Belt, heritage assets and character of the area have been dealt with above in the relevant sections of this report, where it was concluded that the proposal, due to height, scale, mass and siting would be completely out of character and context with the immediate area and is therefore not appropriate in this location.

It is acknowledged that the present open and degraded site detracts from Hillingdon Circus's function as local shopping and that the site is in need of an appropriate scheme of redevelopment, bringing regeneration, vibrancy and improvements to the townscape of North Hillingdon, as recognised in the Local Plan. However, any development needs to be integrated in a way that brings environmental improvements to the whole area and not merely the site itself.

As stated elsewhere in this report, the current scheme is substantially more dense than any previous scheme proposed on the site and Officers considers that the impact of development is overbearing and incongruent within it's townscape surroundings and landscape setting.

The scheme proposes a continuous ribbon of development along the perimeter to the north and west. It is acknowledged that this is designed to reduce the impact of the prevailing hostile noise and air quality environments on the proposed residential uses within the site. However, it is considered that this aspect of the proposal, which includes the 11 storey tower block, would appear completely out of scale and overbearing and would completely overwhelm its immediate surroundings. Furthermore, the proposed development has failed to demonstrate that it could overcome issues relating to Air Quality and Noise (as discussed in more detail in the relevant section of this report).

The Councils Urban Design officer has been consulted on the application and has made the following observations:

The proposed development has a coarse grain comprising large flatted blocks which are at odds with the surrounding townscape which has a much finer grain of modest 2 and 3 storey houses and shops which create a strong suburban character with open space.

Notwithstanding the objections already raised to the inappropriateness of the development's height, bulk and mass to the suburban character of the area, the layout of the buildings and separation distances between the blocks appear to be acceptable on a scheme of this size but as stated previously would be more appropriate in an urban setting with development of a similar height, bulk and mass rather than this suburban setting adjacent to the green belt.

The proposed roof forms comprise flat roofs with parapets, gable ends, mansard elements and set back storeys to provide visual interest. The parapet roofs and gable ends loosely reflect the established roofscape, albeit on a much larger scale, but the introduction of mansard roofs with sheet cladding would be incongruous. These elements would be particularly prominent given the proposed height of the buildings and would draw undue attention and detract from the area.

Notwithstanding the concerns of the height bulk and mass of the development. The detailed design of the facades (see also comments with respect to materials) is generally considered acceptable and well considered. There are some reservations with respect to the rounded arches to the ground floor of the 'Focal Building' to Hillingdon Circus which does not sit comfortably with the architectural language of the floors above.

The development proposes streets and public spaces that are well planted and incorporate a hierarchy of materials for the hard landscaping with shared surfaces which would be complementary and appropriate for the site.

The proposed construction materials for the majority of the blocks have contrasting brickwork with bands of reconstituted stone to accentuate different parts of the facade and is considered acceptable in principle. This would be dependent on appropriate brick, bonding, mortar and stone being chosen to respect the local palette of materials. There are concerns with the use of a green brick to the Park Pavilions as the visualisations suggest that this would be glazed brick. This could draw undue attention and appear incongruous within this sensitive location close to the green belt and would be in stark contrast to the more traditional palette of materials of the established suburban development in the area.

The Local Planning Authority has tried to actively engage with the Applicant at the pre-application stage in order to achieve an acceptable outcome. The quantum of development has remained a key issue and the Applicant has chosen to proceed without making any amendments to the scheme. The proposed development is therefore considered to be contrary to Policies DMHB 1, DMHB 10, DMHB 11, DMHB 12, DMHB 13, DMHB 13A, DMHB 14, DMHB 15, DMHB 17, DMEI 1, DMCI 2, DMCI 3, DMCI 4, DMCI 5 and Appendix A of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) and Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) are considered relevant and Site specific policy SA14 of the Local Plan: Part 2 -Site Allocations and Destinations (2020). For the reasons set out above, the application is recommended for refusal on design grounds.

## SECURITY

Policy DMHB 15 (Planning for Safer Places) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) seeks to ensure all new development are safe and attractive public and private spaces and promotes Secured by Design principles. This is supported by Policy 7.3 of the London Plan (March 2016) and Policy D10 of the draft London Plan - Intend to Publish (December 2019).

The Metropolitan Police Crime Prevention Officer has been consulted on the application and considers that achieving Secured By Design accreditation is achievable on the site. The Metropolitan Police Crime Prevention Officer has requested that any permission be subject to conditions requiring further details of the how the development would achieve full Secured by Design Accreditation. The Metropolitan Police Crime Prevention Officer's full response is set out above in the External Consultations section.

#### **7.12 Disabled access**

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from direct discrimination on the basis of a protected characteristic, which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease.

The Act states that service providers should think ahead to take steps to address barriers that might impede disabled people.

Policy 3.5, 3.8 and 7.2 of the London Plan (2016), Policy D5 of the draft London Plan - Intend to Publish (December 2019), the Mayor of London's Housing Standards, Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the Accessible Hillingdon Supplementary Planning Document (September 2017) require that all residential units are built in accordance with Part M4(2) of the Building Regulations 2010 (2015 Edition) and that 10% of the units be designed and constructed in accordance with Part M4(3) of the Building Regulations 2010 (2015 Edition). In the event of an approval, appropriately worded conditions could be attached to any consent, to ensure compliance with these standards.

The Council's Access officer has been consulted on the application and initially raised a number of concerns (set out in full above in the Internal Consultees section). Following review of further information relating to the proposed M4(3) Wheelchair Accessible/Wheelchair Adaptable dwellings the Council's Access officer confirmed that the original accessibility concerns had been addressed. However, a number of concerns relating to the external environment remained outstanding. In this regard the Council's Access officer considered these remaining issues could be addressed via planning conditions should permission be granted. The suggested conditions are set out in full above in the Internal Consultees section.

For the reasons set out above, it is considered that subject to suitably worded conditions, the proposed development could be in accordance with The Equality Act 2010 and with Policy 3.5, 3.8 and 7.2 of the London Plan (2016), Policy D5 of the draft London Plan - Intend to Publish (December 2019), the Mayor of London's Housing Standards, Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the Accessible Hillingdon Supplementary Planning Document (September 2017).

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

The London Plan (2016) Policies 3.10-3.13 require Boroughs to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes, having regard to their affordable housing targets. The Local Plan: Part 1 (2012) Policy H2 requires sites with a capacity of 10 or more units to provide an affordable housing mix which reflects housing needs in the borough. The Local Plan: Part 2 (2020) Policy DMH 7 outlines that subject to viability, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split 70% Social/Affordable Rent and 30% Intermediate.

The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017) and Intend to Publish Version of the London Plan (2019) have established the threshold approach to affordable housing applications. Where proposals meet or exceed the relevant threshold level and are consistent with the relevant tenure split, a Financial Viability Appraisal (FVA) is therefore not required, subject to the applicant confirming they have sought grant funding to increase the level of affordable housing. Draft Policy H6 of the London Plan (Intend to Publish Version (Dec 2019)) outlines that a minimum of 30% of the affordable housing should be intermediate, a minimum of 30% should be social/affordable rent and the remaining 40% is to be determined by the Council. In line with the Local Plan: Part 2 (2020) Policy DMH 7, this 40% should also be social/affordable rent. It should be noted however that it may not be possible to achieve this tenure split exactly and therefore nominal variations will need to be accepted.

The proposed development would provide a total of 514 units within 1398 Habitable rooms split as below:

Intermediate (shared ownership) = 61 units (33.5% of affordable units)  
Affordable Rent (London Affordable Rent) = 121 units (66.5% of affordable units)  
Total affordable = 182 units (35.4% of all units)

Intermediate (shared ownership) = 149 habitable rooms (10% of all habitable rooms)  
Affordable Rent (London Affordable Rent) = 343 habitable rooms (25% of all habitable rooms)  
Total affordable = 492 habitable rooms (35% of all habitable rooms)

The development therefore proposes 35.4% affordable housing with a tenure split of 33.5% (Intermediate (shared ownership) / 66.5% (London Affordable Rent) which is policy compliant.

Market (Total of 332 split into 134 x 1 bed, 154 x 2 bed, 44 x 3 bed)  
Affordable (Intermediate (shared ownership) (Total of 61 units split into 34 x 1 bed, 27 x 2 bed)  
Affordable (London Affordable Rent) (Total of 121 units split into 53 x 1 bed, 35 x 2 bed, 33 x 3 bed)

The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017) and Intend to Publish Version of the London Plan (2019) outlines that the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes.

The level of affordable housing therefore complies with the adopted Development Plan. It also complies with the threshold approach to applications set out in the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017) and Intend to Publish Version of the London Plan (2019), subject to the applicant confirming they have sought grant funding to increase the level of affordable housing.

Accordingly, the proposal would make provision for a level of affordable housing which is appropriate subject to a signed legal agreement to secure this provision.

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

##### **TREES AND LANDSCAPING**

Policy EM4 (Open Space and Informal Recreation) of the Local Plan: Part 1 - Strategic

Policies (2012) says that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities. The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says (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.

Site specific Policy SA 14 of the Hillingdon Local Plan: Part 2 - Strategic Policies (2012) says that developments in this location should (amongst other things) secure substantial planting and landscaping in association with any development and provide environmental improvements and landscaping as necessary to enhance the local shopping and residential environment; and

London Plan Policy 7.4 identifies that development proposals should provide a high quality design response that contributes to a positive relationship between the urban structure and natural landscape features, including the landform and topography of the area'.

The site is covered by TPO 6, however, there are no protected trees remaining on the master Brewer site. Two oaks T7 and T9 survive on the Council-owned land in the south-east (this lies outside of the application site). The site lies within Hillingdon's Landscape Character Area G3: Yeading Brook River Corridor. Since the previous applications, the site has largely been cleared. As a result of the site clearance, any boundary screening is now heavily reliant on off-site, or 'borrowed' tree cover which lies outside the control of the developer.

Remaining tree cover includes the wooded road embankment alongside Long Lane (west boundary), tree and shrub cover at the top of the retaining wall adjacent to the A40 (north), the mixed woodland on the Council-owned land (south-east corner) and the part-wooded Green Belt land of Freezeland Covert to the east.

Since the previous applications, the current developer now owns the plot of land adjacent to the east boundary which will facilitate both visual and physical connectivity between the site and the public open space to the east.

Following concerns raised with regard to the imposing nature of the proposals along the western boundary of the site on Long Lane, additional tree planting has been proposed in this area, however, it is limited in its extent due to the proposed building line and is not



considered to provide a sufficient buffer to the proposed development.

More recently the large Weeping willow at the site entrance has suffered from the collapse of a major limb and will be removed by the Council. - This work is essential for reasons of safety and sound arboricultural management. Although the tree is not protected by TPO, it is a prominent feature and local landmark, and had been identified for retention in the proposed development.

The tree loss on the proposed development is significant, with much of the tree removal already implemented. As previously noted the quantum of loss was previously accepted by the Council, as part of the approved scheme at the site and importantly, no protected trees will be removed to facilitate the development.

The open spaces and landscape proposals within the site appear to be an improvement on the previous schemes, albeit the potential adverse effects on daylight and microclimate are not known.

The acquisition of the plot of Green Belt land to the east is, potentially, a significant benefit to the scheme and presents new opportunities to improve both the visual and physical connections to the Green Belt.

In summary, the tree and Landscape Officer considered that the application could be deemed acceptable subject to suitable conditions and a financial contribution towards the enhancement of the Freezeland Covert to the east. Full details of the suggested conditions are set out in the Internal Consultee section above. The proposed ecological works comprised of ecological enhancements off site, alongside significant additional tree planting works to screen views of the site when viewed from the East.

## ECOLOGY

Paragraph 170 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes and sites of biodiversity;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

This is supported by Policy 7.19 of the London Plan (March 2016) and Policy G6 of the draft London Plan - Intend to Publish (December 2019).

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 EM7 (Biodiversity and Geological conservation) of the Local Plan: Part 1 - Strategic Policies (2012) seeks the protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plan and will (amongst other things) seek the provision of biodiversity improvements from all development, where feasible. This is further reiterated by Policy DMEI 7 of the Local Plan Part 2; Development Management Policies (2020).

An Ecology report has been submitted in support of this application which identifies that the proposals do not accord with planning policy requirements in delivering no net loss of ecological value. The Council's Ecology Officer has been consulted on the proposals and has raised no objections to the proposed development subject to two pre-commencement conditions and an offsite contribution for land to the east to mitigate the identified impacts on the existing suite ecology.

The ecological assessment provides an appropriate assessment of the site with regard to most species, although more work is required in relation to bats. The assessment has identified that the site, although a former developed site, has been colonised by a range of habitat types that renders the site of biodiversity value. In particular, the site is likely support a small slow worm population as well as being beneficial for amphibians, invertebrates and mammals. The unused nature of the site has a high quality habitat that connects with the land to the east which is designated as a site of importance for nature conservation (SINC) (Borough Grade 1). In turn this SINC connects further northwards to the highly valuable Ickenham Marshes. The A40 provides a significant barrier for various species including reptiles and amphibians but far less so for winged animals. Consequently, this network is a rich and highly valued ecological corridor in an otherwise urbanised area.

The site also has a series of scattered trees which for the most part appear to have been assessed although it is not clear whether the tree belt to the north has been surveyed which is a concern as a large number of mature trees in this area will be lost to the development. The proposed development will effectively remove the majority of the important wildlife habitat on the site, reduce the opportunities for slow worm (protected species), remove a large amount of trees and ideal invertebrate habitat; ultimately the proposal would result in a net biodiversity and is therefore contrary to policy as presented.

However, the site is allocated for development and previous proposals have secured solutions to the net ecological reduction through works and contributions to the neighbouring land to the east. The only way this development could be policy compliant is for 1) a suitable clearance of the site that manages the ecological value prior to any clearance and 2) a contribution to an offsite solution that allows for translocation of species and mitigation for the onsite impacts.

Consequently, for the development to be policy compliant the developer must include a suitable contribution to the offsite plans for landscaping and public park works that cover

the ecological mitigation. The works are costed at £539,000 and the applicant has agreed to provide this as a financial contribution to mitigate the ecological harm.

In summary, the provision of off-site ecological enhancement has not currently been secured by way of a legal agreement, the development as it stands would not make adequate provision of ecological mitigation. However, it should be noted that this issue could be addressed, were an appropriate legal agreement to be completed and conditions attached to any approval.

## BIODIVERSITY

A summary of Biodiversity Net Gain and Urban Greening Factor calculations have been prepared by the London Wildlife Trust and submitted in support of this planning application.

Biodiversity Net Gain summary:

The Proposed Development will achieve a positive net gain in biodiversity producing a score of 1.4, from a baseline score of 3.8 habitat units and a proposed development scheme of 5.2 habitat units. This a 26% biodiversity net gain, which is above HM Government's draft recommendation of achieving 10% net gain. The Biodiversity Net-Gain score is based on the creation of 8 distinct habitat types comprising:

- o Sealed surfaces (hardstanding)
- o Broadleaved woodland
- o Mixed native scrub
- o Modified grassland (amenity lawn)
- o Street trees (in hard-surfacing)
- o Open mosaic habitat
- o Introduced shrubs (including herbaceous planting)
- o Flower rich/species-rich neutral grassland

Urban Greening Factor:

The Proposed Development has achieved an urban greening factor of 0.4. The Urban Greening Factor score is based on the creation of 12 distinct surface cover types comprising:

- o Buildings (excluding green roofs/podiums)
- o Sealed surfaces
- o Permeable paving
- o Semi-natural vegetation
- o Hedgerow
- o Ground cover
- o Flower rich grassland
- o Standard trees in connected pits
- o Standard trees in individual pits
- o Rain gardens and SUD's
- o Extensive green roof
- o Intensive green roof

Were the development acceptable in all other respects, the delivery of the 0.4 urban greening factor would have been secured by way of a planning condition.

### **7.15 Sustainable waste management**

Policy 5.16 of the London Plan (2016) sets out the Mayor's policy for waste management,

including the need to minimise waste and encourage recycling. This is supported by policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012).

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

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 Council's Waste Officer has been consulted on the application. In response to initial concerns raised by the Council's Waste Officer, the Applicant has submitted further information with regards to the Commercial bin storage area. All issues are now considered resolved and the provision of adequate refuse and recycling facilities should be secured by way of planning condition.

As such, the proposed development is considered to accord with Policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 5.16 of the London Plan (2016).

## **7.16 Renewable energy / Sustainability**

Policies DMEI 1 and DMEI 3 of the Local Plan: Part 2 - Development Management Policies (2020) relate to reducing carbon emissions (and decentralising energy). Policy EM1 of the Local Plan: Part 1 - Strategic Policies (2012) relates to climate change.

Policy 5.2. Part A of the London Plan (2016) and draft policy SI 2 of the draft London Plan (Intend to Publish) (2019) requires development proposals to make the fullest contribution to minimising carbon dioxide emissions by employing the hierarchy of using less energy; supplying energy efficiently; and using renewable technologies. Part B of the policy currently requires non domestic buildings to achieve a 35% improvement on building regulations 2013. This policy also requires major residential developments to achieve a zero carbon standard. However if this cannot be achieved then a cash in lieu contribution will be sought. Parts C & D of the policy require proposals to include a detailed energy assessment.

The Energy Strategy submitted with the application assesses the feasibility of incorporating other renewable energy technologies on the site. The energy assessment sets out an array of measures onsite to reduce CO2.

The Council's Sustainability Officer has assessed the submitted information and has raised no objections to the proposed development subject to one condition and an offsite contribution. The condition is necessary to secure further details regarding the energy strategy, and the offsite contribution is necessary to make the development policy compliant (i.e. zero carbon).

The financial contribution is required because the energy assessment identifies a significant shortfall from the zero carbon target required by the London Plan. The shortfall amounts to 325.75 tCO2. Consequently, the S106 must include a carbon offset contribution of £586,422, payable to the London Borough of Hillingdon in accordance with policy 5.2(e) of the London Plan.

Subject to the signing of a S106 and the suggested condition outlined above, it is

considered that the scheme could have satisfactorily addressed the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, in compliance with Policies DMEI 1 and DMEI 3 of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM1 of the Local Plan: Part 1 - Strategic Policies (2012) and Policy 5.2 of the London Plan, and the NPPF.

#### **7.17 Flooding or Drainage Issues**

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. Policies DMEI 9, DMEI 10 and DMEI 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding.

The application is not located within a zone at risk of flooding, however due to the size of the development it is necessary for it to demonstrate that it would incorporate sustainable drainage techniques and reduce the risk of flooding in accordance with the requirements of Local Plan Policies and Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

A Flood Risk Assessment (FRA) and Drainage Strategy has been submitted as part of the application taking into consideration the principles of the NPPF and other relevant regional and local policies.

The Council's Flood Risk team have been consulted on the application and raised a number of queries which the Applicant then responded to. While there are aspects of the submitted drainage strategy that the Flood Risk team are not in agreement with, it is considered that the detail of the drainage design could be secured post-planning by way of a suitably worded condition. In this respect the Flood Risk team provided draft text for the suggested conditions which can be found above in the Internal Consultees section.

Furthermore, the drainage hierarchy (London Plan Policy 5.13) requires a connection to a watercourse in preference to a connection to the sewer. A S106 Contribution of £35,000 is therefore required for the Council to extend the watercourse from the site to Freezeland Covert as part of improvements to the Green Belt land to the east of the development.

This contribution should be treated separately from the Landscape/Ecology works to Freezeland Covert identified elsewhere in this report.

It is therefore considered that subject to suitably worded condition and a financial contribution (of £35,000) towards the cost of extending the watercourse from the site to Freezeland Covert, the scheme could be deemed in accordance with Policy EM6 (Flood Risk Management) of the Local Plan: Part 1 - Strategic Policies (2012), Policies DMEI 9, DMEI 10 and DMEI 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

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

##### **NOISE**

The Government's National Planning Policy Framework (NPPF) gives the Government's guidance on noise issues. It states that planning decisions should (i) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, and (ii) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from new development, including through the use of conditions. According to the Government's Noise Policy Statement for England (NPSE) of March 2010, these aims should be achieved within the context of Government policy on sustainable

development.

London Plan Policy 7.15 aims to reduce and manage noise to improve health and quality of life and supports the objectives of the Mayor's Ambient Noise Strategy.

Hillingdon LPP1 Policy EM8 seeks to promote the maximum possible reductions in noise levels and minimise the number of people potentially affected in target areas as identified by the Defra Noise Action Plan.

An Acoustic Assessment has been submitted in support of the proposed development. This report has been assessed by external consultants (Anderson Acoustics) on behalf of the Council and the Applicant was given the opportunity to respond. The Applicant's response was subject to further review by external consultants (Anderson Acoustics).

The primary noise sources were identified as the A40 to the north and Long lane to the west which was agreed by Anderson Acoustics (on behalf of the Council). However, aircraft movements to and from RAF Northolt were not logged in the Noise Assessment and so it is unknown if there were aircraft movements during the survey period. In summary, the external consultant (Anderson Acoustics) made the final following recommendations:

- That justification be sought for the MVHR in the context of the London Plan's cooling hierarchy and sustainable development;
- That further information be sought regarding the over-heating analysis mentioned is submitted to assist in the determination of the planning application;
- That in the event of planning permission being granted, to apply conditions for the CEMP; commercial and plant noise assessment and limits; and details of the final noise mitigation (including external amenity areas), ventilation and cooling strategy.

In summary, it is considered that the application has failed to demonstrate that the proposed residential units can be sited, designed, insulated, or otherwise protected from external noise sources to appropriate national and local standards, contrary to Policy EM8 of the Hillingdon Local Plan Part 1, Policy 7.15 of the London Plan and the NPPF.

The proposed development is therefore recommended for refusal.

## AIR QUALITY

With regards to air quality Policy DMEI 14 (Air quality) of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM8 of the Local Plan Part 1 (2012), Policy 7.14 (Improving Air Quality) of the London Plan (2016), Policy SI 1 of the draft London Plan - Intend to Publish (December 2019) and the NPPF are considered relevant.

The Applicant has submitted an Air Quality Impact Assessment as part of the application submission and this has been reviewed by Air Quality Experts Global Ltd on behalf of the Council. Air Quality Experts Global Ltd initially raised a number of queries which the Applicant has responded to in full. However many of the initial concerns remain. Air Quality Experts Global Ltd's full response is set out above in the Internal Consultee section but in summary the Applicant has failed to address the following issues:

- The applicant has not provided any quantification of the emission reduction that the proposed measures would achieve or set out what benefits would they yield in terms of air

quality

- The monitoring locations chosen are not located at hot spot locations which are likely to be affected by the proposed development
- The monitoring duration is not considered sufficient
- No neutral assessment has been submitted by the applicant as per the London Plan requirements.
- The applicant has failed to address the issue of worsening of existing exceedances
- The mitigation offered is not quantified in terms of emission reduction achieved
- No evidence has been produced to substantiate claims that the proposed development will not exacerbate congestion in the area or significantly impact local air quality

The appointed consultants have calculated a damage cost of £294,522 based upon the limited information provided to them to date, however, this has been calculated without all of the above information. It is not therefore possible to ascertain if a financial contribution of £294,522 would achieve an Air Quality Neutral development, or indeed if the sum is too high. As such, whilst the applicant has agreed to provide the sum, without the further information requested, the Council cannot agree to accept the sum, as it is not quantified if this would mitigate against the harm and provide policy compliance.

In summary, it is considered that the proposed development has failed to provide sufficient information regarding Air Quality within the development itself or demonstrate sufficient means of mitigation against the impact of the development on the wider area. This is contrary to Policy DMEI 14 (Air quality) of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM8 of the Local Plan Part 1 (2012), Policy 7.14 (Improving Air Quality) of the London Plan (2016), Policy SI 1 of the draft London Plan - Intend to Publish (December 2019) and the NPPF (February 2019). The proposed development is therefore recommended for refusal on this basis.

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

The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015 as a Major Development. 1943 surrounding property owners/occupiers have been consulted. At the time of writing the report, two letters of support had been received and 265 representations had been received objecting to the scheme.

The main issues raised are summarised in the 'External Consultee' section of this report.

A number of objections have been raised by local residents in regard to impact on local infrastructure and services and in particular schools and GPs. The scale of the development and expected population is not expected to create a successful and sustainable neighbourhoods because it would represent a disproportionate influx of people which is inconstant with the existing context. The long-term needs of all residents including the existing residents would therefore be compromised.

Many of the concerns raised have been assessed and addressed by officers in this report in the relevant section. Officers have tried to ensure that the report sections cover objections where they relate to material planning considerations.

The Ickenham Residents Association and Oak Farm Residents Associations have submitted detailed comments to the Council. These were assessed by Officers and the issues raised have been taken into account and addressed within the body of the report.

#### **7.20 Planning obligations**

The following contributions or planning obligations are required in order to mitigate the

impacts of the development as required by Policy DMCI 7 (Planning obligations and CIL) of the Local Plan Part 2 Development Management Policies (2020). If the application were to be considered for approval, the following broad S106 Heads of Terms would be pursued by the Council at that time:

(i). Affordable Housing:

Intermediate (shared ownership) = 61 units (33.5% of affordable units)  
Affordable Rent (London Affordable Rent) = 121 units (66.5% of affordable units)  
Total affordable = 182 units (35.4% of all units)

Intermediate (shared ownership) = 149 habitable rooms (10% of all habitable rooms)  
Affordable Rent (London Affordable Rent) = 343 habitable rooms (25% of all habitable rooms)  
Total affordable = 492 habitable rooms (35% of all habitable rooms)

Affordable (Intermediate (shared ownership) (Total of 61 units split into 34 x 1 bed, 27 x 2 bed)

Affordable (London Affordable Rent) (Total of 121 units split into 53 x 1 bed, 35 x 2 bed, 33 x 3 bed)

(ii). Construction Training: either a construction training scheme delivered during the construction phase of the development or a financial contribution secured equal to the formula as contained in the SPD (£2,500 for every £1m build cost + (total gross floor area/7,200m<sup>2</sup> x £71,675) = total contribution)

(iii). Landscape Screening and Ecological Mitigation: a financial contribution in the sum of £539,000

(iv) Carbon Fund: a contribution of £586,422 for a carbon fund to make up for the shortfall for this development and in order to make it policy compliant

(v). Parking Permit exclusion clause for all future residents

(vi) Car Club Spaces and 3 years free membership

(vii) Contribution of £35,000 towards the Council extending the watercourse from the site to Freezeland Covert in order to overcome surface water drainage issues

(viii) Project Management and Monitoring Fee: a contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement.

Contributions towards education, health, libraries and community facilities are now covered by the Hillingdon Community Infrastructure Levy.

Although the application is recommended for refusal, the Applicant has agreed in principle to the above proposed Heads of Terms, which could be secured by way of the S106

It is considered that the level of planning benefits sought in the event of an approval would be reasonable, adequate and commensurate with the scale and nature of the proposed development, in compliance with Policy DMEI 7 (Planning obligations and CIL) of the Local Plan: Part 2 - Development Management Policies (2020).



## **7.21 Expediency of enforcement action**

Not applicable.

## **7.22 Other Issues**

### **COMPREHENSIVE DEVELOPMENT**

The application site forms part of the wider parcel known as Site 'B' of adopted site allocation SA14; Local Plan Part 2 (2020). The application site however does not encompass all land within Site B and therefore it is necessary to consider whether the proposals potentially blight the neighbouring land. The application submission has demonstrated that there are adequate set backs provided (a minimum of 13m from the main facade at Building 12) along the southernmost boundary of the application site, where it adjoins the remaining land parcel within site B to ensure that this site could come forward in isolation without being prejudiced by the current proposals.

### **FIRE SAFETY**

Policy D12 (Fire safety) of the draft London Plan - Intend to Publish (2019) says that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. In this regard an Outline Fire Strategy has been submitted as part of the application. It is considered that a condition should be added to any permission to secure the submission, agreement and implementation of a detailed Fire Strategy for all parts of the development in accordance with draft Policy D12 (Fire safety) of the London Plan - Intend to Publish (2019).

## **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**

No objections are raised to the principle of a mixed use development on the site. However, it is considered that the height, scale massing, siting and design of the development would fail to introduce a built form that is appropriate to the local context and character of the area and would have a negative impact on views from the neighbouring Green Belt and would be detrimental to the setting of nearby heritage assets. Furthermore, the density of the proposed development would be above London Plan guidance.

It is considered that the proposed development would, due to its size, scale, siting and mass, completely overwhelm its smaller scale suburban surroundings. The disproportionate scale of proposed tall development up to 11 storeys is clearly unsuitable for the proposed location, which is not proportionate to the scale of the local centre, but more in keeping with the scale of a metropolitan or regional centre.

Whilst it is acknowledged that the site is in need of an appropriate scheme of redevelopment, this needs to be integrated in a way that brings environmental improvements to the whole area and not merely the site itself. Officers have worked proactively with the applicant through negotiations to address issues wherever possible, both at pre-application and application stage. Notwithstanding these discussions, the scheme was ultimately considered to fail to comply with the development plan for the reasons identified in this report.

The application also fails to demonstrate that the proposal would not result in an unacceptable rise in traffic in and around the application site, causing severe impacts to the free flow of traffic as well as to highway and pedestrian safety.

Furthermore, on-site parking provision for the residential element is considered inadequate and insufficient to address the demands of the proposed development in this locality, given the site's relatively low public transport accessibility.

Whilst the proposed development would generally provide acceptable living conditions in terms of space standards for all of the proposed units and protect the residential amenity of surrounding occupiers, objections still remain regarding daylight and sunlight levels for the proposed occupants, noise levels within the development and failure to provide sufficient information to assess if the development is air quality neutral. Furthermore, insufficient private amenity space has been provided.

Based on the information submitted to date, there are a number of issues which are also considered unsatisfactory. However it is considered that subject to appropriately worded conditions (or legal agreement) these issues could be resolved. These issues are; Accessibility within the site; Flood Risk and Surface Water Drainage; Landscaping and Ecology.

There are a number of items which need to be secured by way of a legal agreement which are listed in detail within the Planning Obligations section of this report. Although agreement to some of the obligations has been indicated by the Applicant neither a S106 Agreement or Unilateral Undertaking has been signed. The development therefore fails to satisfactorily address some issues relating to contributions towards the improvements required as a consequence of the proposed development. This is in respect of off-site highways works, public transport, travel plans, employment and training, parking permits and car club, landscape screening and ecological mitigation, affordable housing, surface water drainage, air quality, off-site carbon contribution and project management and monitoring.

For the reasons set out above, the application is being recommended for refusal.

## **11. Reference Documents**

Hillingdon Local Plan: Part 1 Strategic Policies (2012)

Hillingdon Local Plan: Part 2 Site Allocations and Designations (2020)

Hillingdon Local Plan: Part 2 Development Management Policies (2020)

London Plan (2016)

Draft London Plan - Intend to publish (2019)

National Planning Policy Framework (2019)

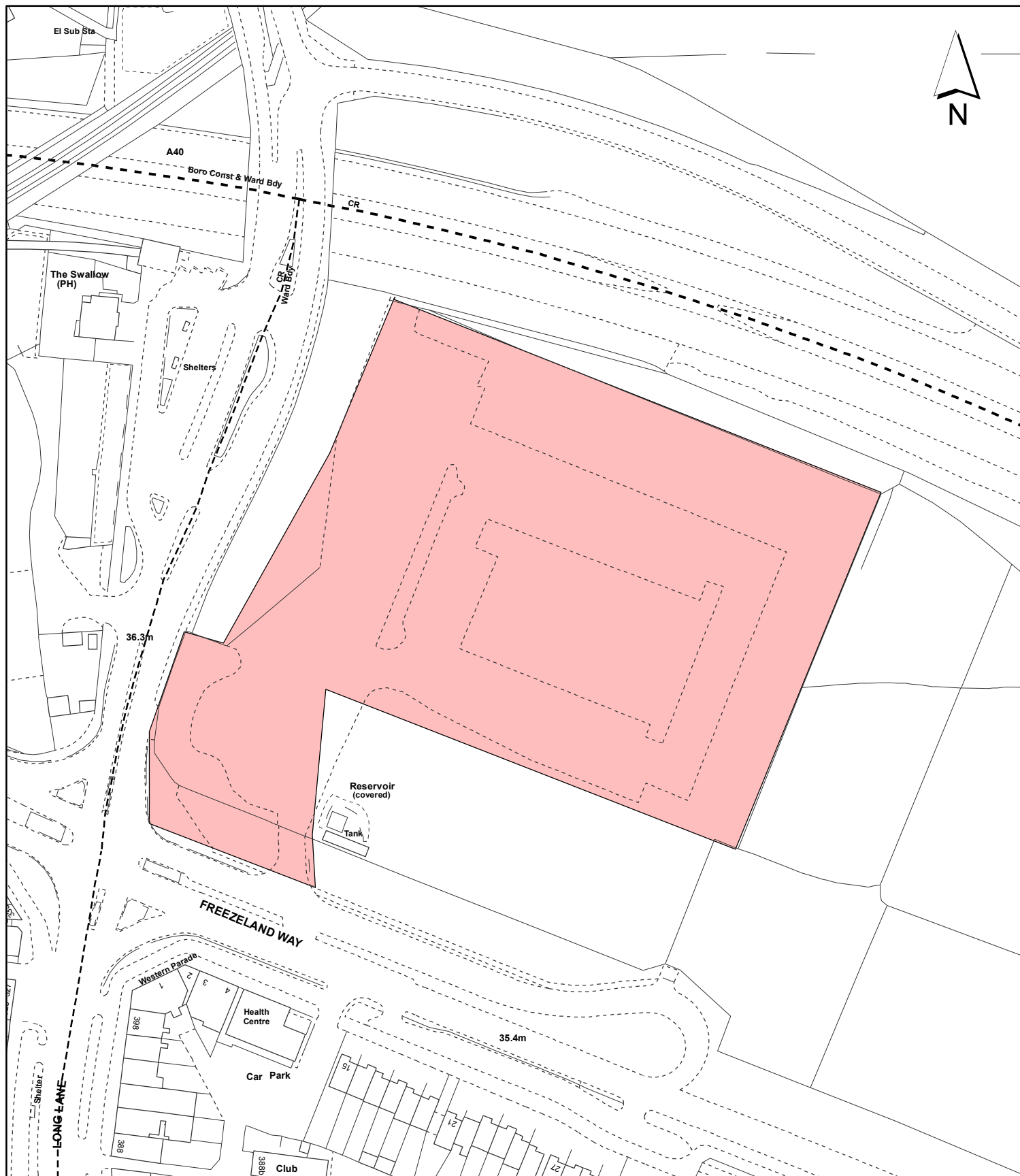
The Mayor's Housing SPG (2016)

The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)

Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas

**Contact Officer:** Faye Mesgian

**Telephone No:** 01895 250230



#### Notes:

 Site boundary

For identification purposes only.

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Site Address:

### Former Master Brewer Site Freezeland Way

Planning Application Ref:

**4266/APP/2019/3088**

Planning Committee:

**Major Page 164**

Scale:

**1:1,650**

Date:

**February 2020**

### LONDON BOROUGH OF HILLINGDON

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## Report of the Head of Planning, Transportation and Regeneration

**Address** BOURNE COURT SITE BOURNE COURT RUISLIP

**Development:** Deed of Variation to Section 106 Schedule 1 (Affordable Housing) associated with planning permission ref: 11891/APP/2018/3414, dated 17/06/19 (Redevelopment to provide 87 residential units in two blocks, together with associated access, car and cycle parking; communal and private amenity space; and landscaping) to remove the requirement for a commuted sum and replace it with an affordable housing obligation for an on-site provision with 54 shared ownership units in Block A and 33 affordable rented units in Block B.

**LBH Ref Nos:** 11891/APP/2019/3855

**Drawing Nos:** 010  
100 Rev. 02  
Section 106 Agreement (Dated 14th June 2019)

**Date Plans Received:** 28/11/2019

**Date(s) of Amendment(s):**

**Date Application Valid:** 29/11/2019

### 1. SUMMARY

This Deed of Variation application to Schedule 1 (Affordable Housing) of the Section 106 attached to planning permission ref: 11891/APP/2018/3414 seeks permission to remove the requirement for a commuted sum and replace it with an affordable housing obligation for an on-site provision with 54 shared ownership units in Block A and 33 affordable rented units in Block B. Although the proposed tenure mix is not in accordance with the Council's preferred tenure split, as the site will now come forward as 100% affordable housing, no financial viability assessment is required to justify an alternative mix. Overall, the proposed provision of affordable housing is supported and is considered acceptable in principle. As such, this application is recommended for approval.

### 2. RECOMMENDATION

**APPROVAL, subject to the following:**

**1. That the Council enter a Deed of Variation with the applicants under Section 106 of the Town and Country Planning Act 1990 (as amended) or other appropriate legislation to secure:**

**(i) Amendment of Schedule 1 to remove the requirement for a commuted sum and replace it with an affordable housing obligation for an on-site provision of 87 affordable units (100%) comprising the following mix:**

**- Block A**

**20 x one-bed Shared Ownership units**

**28 x two-bed Shared Ownership units**

**6 x three-bed Shared Ownership units**

**- Block B**

**14 x one-bed Affordable Rented units**

**17 x two-bed Affordable Rented units**

**Major Applications Planning Committee - 19th February 2020**

**PART 1 - MEMBERS, PUBLIC & PRESS**

## **2 x three-bed Affordable Rented units**

**2. That the applicant meets the council's reasonable costs in the preparation of the deed of variation and any abortive work as a result of the deed not being completed.**

**3. That Officers be authorised to negotiate and agree the amended terms for the Affordable Housing Schedule in the Deed of Variation.**

### **3. CONSIDERATIONS**

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

The application site comprises an approximately 0.7 hectare broadly square shaped plot located at the north west end of Bourne Court, a residential cul-de-sac accessed off Station Approach in South Ruislip.

There were previously 3 detached buildings within the site. The Phoenix Centre and Wren Centre which were formerly used as a day care centre for adults with physical mobility and learning difficulties and Bourne Lodge which was formerly a care home facility. Bourne Lodge Care Home closed down due to outdated facilities and accommodation which did not meet current care home standards. The Phoenix and Wren Centres have been relocated to new purpose designed facilities. All buildings on the site have now been demolished.

The site falls within a mixed use area. It is bounded to the south west by the rear gardens of two-storey predominantly terraced houses in Canfield Drive; to the north west by Odyssey Business Park, which comprises office buildings and associated parking areas; to the north east by commercial buildings located in The Runway; and to the south east by three-storey flats in Bourne Court. A Council owned public path exists to the south west corner of the plot adjacent to the substation which leads to Station Approach.

South Ruislip Local Centre is located to the north east and beyond Bourne Court to the south east. Station Approach is designated as a Local Distributor Road.

#### **3.2 Proposed Scheme**

This application relates to the planning permission (reference 11891/APP/2018/3414) granted for the erection of residential development comprising 87 residential units in two blocks of flats, 87 car parking spaces and associated access, amenity and landscaping works. Specifically, the Deed of Variation to Section 106 Schedule 1 (Affordable Housing) to remove the requirement for a commuted sum and replace it with an affordable housing obligation for an on-site provision with 54 shared ownership units in Block A and 33 affordable rented units in Block B. The blocks are proposed to comprise the following mix:

- Block A
  - 20 x one-bed Shared Ownership units
  - 28 x two-bed Shared Ownership units
  - 6 x three-bed Shared Ownership units

- Block B
  - 14 x one-bed Affordable Rented units
  - 17 x two-bed Affordable Rented units

2 x three-bed Affordable Rented units

### **3.3 Relevant Planning History**

11891/APP/2018/3414 Bourne Court Site Bourne Court Ruislip

Redevelopment to provide 87 residential units in two blocks, together with associated access, car and cycle parking; communal and private amenity space; and landscaping

**Decision:** 04-04-2019 Approved

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

Planning permission reference 11891/APP/2018/3414 granted permission for 87 residential units in two blocks, together with associated access, car and cycle parking; communal and private amenity space; and landscaping.

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

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

1.2 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)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

1.3 The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

#### **Emerging Planning Policies**

1.4 Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London

Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

PT1.H2 (2012) Affordable Housing

Part 2 Policies:

DMH 7

LPP 3.10 (2016) Definition of affordable housing

LPP 3.11 (2016) Affordable housing targets

LPP 3.12 (2016) Negotiating affordable housing on individual private residential and mixed-use schemes

LPP 3.13 (2016) Affordable housing thresholds

NPPF- 5 NPPF-5 2018 - Delivering a sufficient supply of homes

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

5.1 Advertisement Expiry Date:- **29th December 2019**

5.2 Site Notice Expiry Date:- Not applicable

## **6. Consultations**

### **External Consultees**

Four objections have been received from members of the public. These are summarised as follows:

- In favour of shared ownership developments to help get young people on the housing ladder.
- Against the housing development as it will increase congestion and crime.
- The site should be used to develop centres to help the community be productive.
- The proposal is for capital gain.
- There is already so much development in South Ruislip.
- It is unclear which units are shared ownership units and affordable rented units.
- Clarification and plans of the proposed single block (application reference 11891/APP/2020/20)

## **Major Applications Planning Committee - 19th February 2020**

### **PART 1 - MEMBERS, PUBLIC & PRESS**



should be provided before setting a precedent.

- Clearview Homes no longer plan to build planning permission reference 11891/APP/2018/3414.

**Officer Comment:**

This application only relates to the removal of a commuted sum as part of the Section 106 agreement and provision of a affordable housing obligation for on-site provision of 54 shared ownership units in Block A and 33 affordable rented units in Block B. Planning permission has already been granted for the residential development. Further, the personal motivations of an applicant is not a material planning consideration. All relevant material planning considerations are addressed in the main body of the report.

**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.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

**Metropolitan Police:**

I have met with the applicant for this site last month and explained what is required for a SBD submission. I am content at this point that the applicant is aware of what is required of them and is able to achieve it within this site. Of note I have informed the applicant that this site would benefit significantly from a security perspective if it is gated at the main entrance. They have told me they would consult yourselves at planning in relation to this and I strongly support any applications to gate off this development. I am happy to discuss further if need be.

**Transport for London:**

Thank you for your consultation on the above proposal to vary S106 Schedule 1 (affordable housing). After examining the application documents, it is confirmed that there are no strategic transport matters and as such TfL has no comments to offer.

**Ministry of Defence:**

No comment.

**Thames Water:**

No comment.

**Internal Consultees**

Planning Policy Officer:

The principle of onsite affordable housing provision is supported in accordance with policies H2 and DMH7 of the Hillingdon Local Plan. However it is note that the proposed tenure mix of 62% intermediate housing and 38% affordable rent is not in accordance with the Council's preferred tenure split and consequently an FVA would usually be required to justify the proposed alternative tenure mix. However because the site will now come forward as 100% affordable housing the relevant planning guidance supporting the delivery of the London Plan states that in such a scenario no FVA is required to justify an alternative mix. Consequently the proposed provision of affordable housing is supported and will significantly boost the affordable provision from this development.

Highways Officer:

There are no highway objections to this planning application

Trees and Landscaping Officer:

This application seeks a deed of variation associated with the S.106 schedule regarding affordable housing. RECOMMENDATION There will be no effect on the site layout or landscape design.

Access Officer:

Accessibility observations are deemed not necessary at this stage. Conclusion: acceptable

## **7. MAIN PLANNING ISSUES**

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

Matters relating to the principle of the proposed development have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid. Please see Section 7.13 for the consideration of affordable housing provision.

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

Matters relating to the density of the proposed development have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

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

The site does not fall within a archaeological priority area, conservation area or area of special local character and there are no listed buildings within the vicinity.

### **7.04 Airport safeguarding**

Matters relating to airport safeguarding have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

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

Not applicable to the consideration of this application. There is no green belt land within the vicinity of this site.

### **7.06 Environmental Impact**

Matters relating to environmental impact have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

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

Matters relating to impact on the character and appearance of the area have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

### **7.08 Impact on neighbours**

Matters relating to impact on neighbour amenity have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

**7.09 Living conditions for future occupiers**

Matters relating to the living conditions of future occupiers have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

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

Matters relating to the impact on the local highway network have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

**7.11 Urban design, access and security**

Matters relating to urban design, access and security have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

**7.12 Disabled access**

Matters relating to disabled access have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

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

Policy H2 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 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- Strategic Policies. 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 - Development Management Policies (January 2020) states:

A) In accordance with national policy:

i) developments with a capacity to provide 10 or more units will be required to maximise the delivery of on-site affordable housing;

ii) subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split (70% Social/Affordable Rent and 30% Intermediate) as set out in Policy H2: Affordable Housing of the Local Plan Part 1.

B) Affordable housing should be built to the same standards and should share the same level of amenity as private housing.

C) Proposals that do not provide sufficient affordable housing will be resisted.

D) To ensure that Policy H2: Affordable Housing of the Local Plan Part 1 is applied consistently and fairly on all proposed housing developments, the requirement for affordable housing will apply to:

i) sites that are artificially sub-divided or partially developed;

ii) phased developments. Where a housing development is part of a much larger development of 10 or more units (gross), affordable housing will be required as part of the overall scheme; and

iii) additional units created through or subsequent amended planning applications, whereby the amount of affordable housing required will be calculated based on the new total number of units on the site. Affordable housing will be required where a development under the 10

unit threshold is amended to have 10 or more housing units in total (gross).

E) 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.

This application seeks permission for a Deed of Variation to Schedule 1 (Affordable Housing) of the Section 106 attached to planning permission reference 11891/APP/2018/3414. It is proposed that the requirement for a commuted sum is removed and replaced with an affordable housing obligation for an on-site provision of 54 shared ownership units in Block A and 33 affordable rented units in Block B, equating to 100% affordable housing provision.

As stated by the Council's Planning Policy Officer, the principle of on-site affordable housing provision is supported but the proposed tenure mix of 62% intermediate and 38% affordable rent is not in accordance with the Council's preferred tenure split. Based on this, a financial viability assessment would usually be required to justify the proposed alternative tenure mix.

Paragraph 2.42 of the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (August 2017) states:

"To incentivise schemes that are largely or entirely affordable, those that propose 75 per cent affordable housing or more as defined by the NPPF may be considered under the Fast Track Route whatever their tenure mix, as long as the tenure and other relevant standards are supported by the LPA."

As the site will now come forward as 100% affordable housing, no financial viability assessment is required to justify an alternative mix. The proposed provision of affordable housing is therefore supported and is considered to significantly boost the affordable provision from this development.

Given the above, the proposal is considered to accord with Policy H2 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMH 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

Matters relating to trees, landscaping and ecology have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

#### **7.15 Sustainable waste management**

Matters relating to sustainable waste management have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

#### **7.16 Renewable energy / Sustainability**

Matters relating to energy and sustainability have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

#### **7.17 Flooding or Drainage Issues**

Matters relating to flooding or drainage issues have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

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

Matters relating to noise and air quality issues have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

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

Please see the 'External Consultees' section of the report.

#### **7.20 Planning obligations**

The alteration proposed to the Affordable Housing planning obligation secured under Schedule 1 of the Section 106 Legal Agreement for planning permission reference 11891/APP/2018/3414 has been discussed in Section 7.13 of this report.

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

Not applicable to the consideration of this application.

#### **7.22 Other Issues**

##### **CONTAMINATION**

Matters relating to land contamination have already been established by grant of original permission and there has been no material change in policy and/or site circumstances to suggest that the previous assessment is no longer valid.

### **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**

None.

### **10. CONCLUSION**

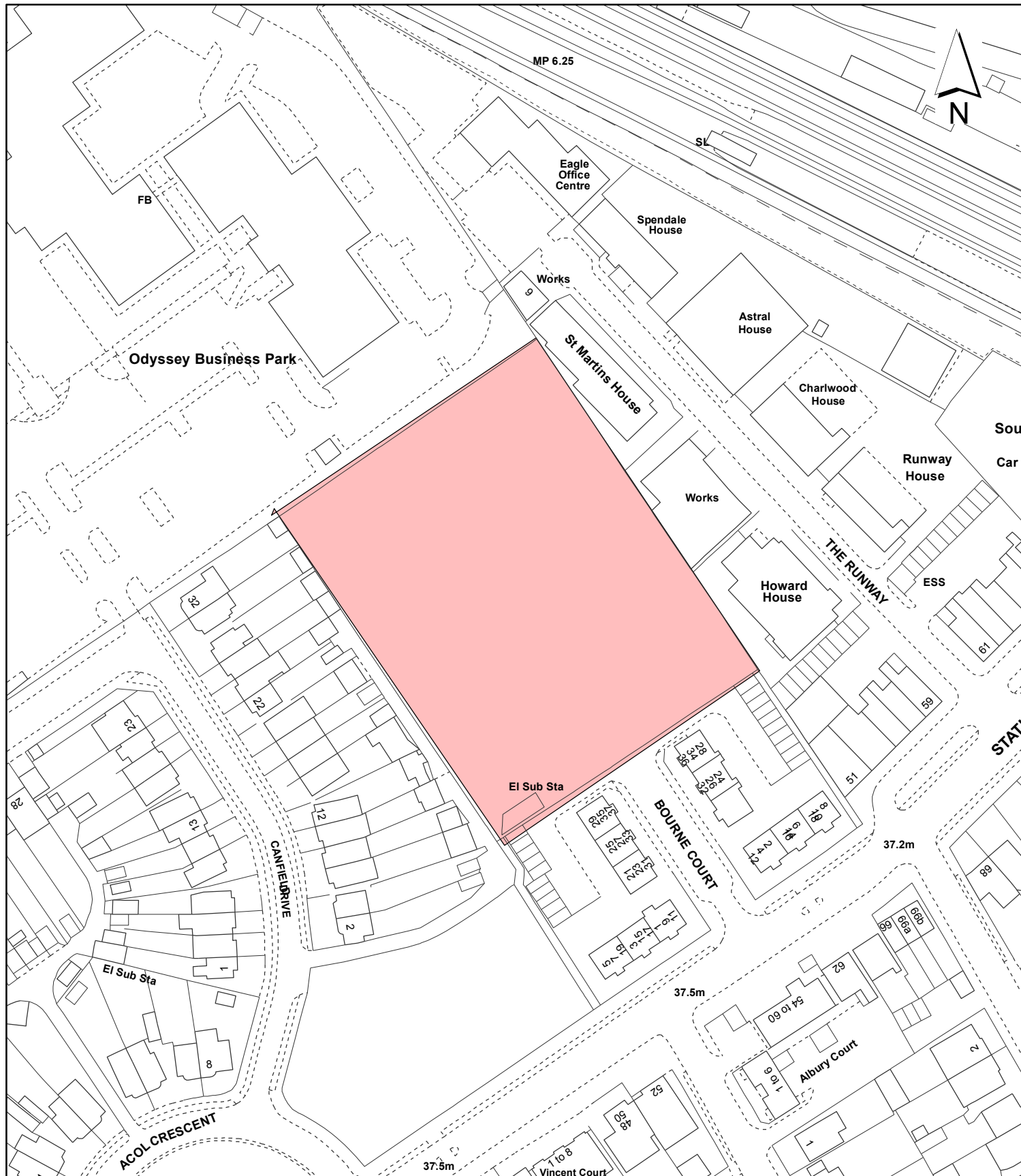
In conclusion, this Deed of Variation application to Schedule 1 (Affordable Housing) of the Section 106 attached to planning permission ref: 11891/APP/2018/3414 seeks permission to remove the requirement for a commuted sum and replace it with an affordable housing obligation for an on-site provision with 54 shared ownership units in Block A and 33 affordable rented units in Block B. Although the proposed tenure mix is not in accordance with the Council's preferred tenure split, as the site will now come forward as 100% affordable housing, no financial viability assessment is required to justify an alternative mix. Overall, the proposed provision of affordable housing is supported and is considered acceptable in principle. As such, this application is recommended for approval.

### **11. Reference Documents**

National Planning Policy Framework (February 2019)  
The London Plan (March 2016)  
Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (August 2017)  
Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)  
Accessible Hillingdon Supplementary Planning Document (September 2017)  
Planning Obligations Supplementary Planning Document (July 2014)

**Contact Officer:** Michael Briginshaw

**Telephone No:** 01895 250230



# Notes:

 Site boundary

For identification purposes only.

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Site Address:

**Bourne Court Site  
Bourne Court**

Planning Application Ref:

**11891/APP/2019/3855**

Planning Committee:

**Major** Page 175

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

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## Report of the Head of Planning, Transportation and Regeneration

<b>Address</b>	CRANFORD PARK THE PARKWAY HAYES
<b>Development:</b>	The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works.
<b>LBH Ref Nos:</b>	14009/APP/2019/4088
<b>Drawing Nos:</b>	50027501-F-DAS-2019-12-13 Dec 2019 50027501-CBA-1-GF-DR-L-0001 Rev P1 535401 PL-101 Rev P5 535401 PL-105 Rev P5 535401 PL-401 Rev P3 3050-56-SK1A 3050-56-SK2A 3050-56-SK3 3050-56-SK4 3050-56-SK5 3050-56-SK6 18910-01 A 18910-03 A 535401 EX-001 Rev P1 535401 EX-010 Rev P1 535401 EX-100 Rev P1 535401 EX-101 Rev P1 535401 EX-102 Rev P1 535401 EX-200 Rev P1 535401 EX-201 Rev P1 535401 EX-202 Rev P1 535401 EX-300 Rev P1 535401 EX-400 Rev P1 535401 EX-401 Rev P1 535401 PL-102 Rev P3 535401 PL-103 Rev P3 535401 PL-106 Rev P3 535401 PL-200 Rev P3 535401 PL-201 Rev P3 535401 PL-400 Rev P1 50027501-November 2019 535401 June 2019 Survey Report and Repair Schedule 535401 REP-001 Rev P1 535401 REP-100 Rev P1 TH 2107 6th September 2019 Cranford Park Planning Statement 50027501-MP-2019-12-06 Nov 2019 535401 Cranford Park View 1 535401 Cranford Park View 2 535401 Cranford Park View 3

535401 Cranford Park View 4  
535401 Cranford Park View 5  
535401 Cranford Park View 6  
50027501-CBA-1-GF-DR-L-0010 Rev P2  
50027501-CBA-1-GF-DR-L-0110 Rev P2  
18910-02 B  
535401 PL-105 Rev P7

**Date Plans Received:** 20/12/2019 **Date(s) of Amendment(s):** 20/12/2019

**Date Application Valid:** 23/12/2019

## 1. SUMMARY

This application proposes works within Cranford Park to assist with the regeneration of the park by providing new facilities and to restore its historic core. It is proposed to repair the existing Grade II Listed Stable Block building, including refurbishment to provide flexible accommodation with the first floors converted to commercial use (Use Class B1). Also a new cafe (Use Class A3) with associated commercial kitchen, toilets and amenity accommodation is proposed above the Grade II Listed cellars of the former (now demolished) Cranford House. Access and refurbishment of the cellars is proposed for use linked to the new cafe building and also a part change of use of the cellar for a small quantum of non-cafe related floorspace for use as a museum/exhibition (Use Class D1). The existing kiosk building is proposed to be adapted for additional public toilets and further works are proposed that include a refurbishment and extension to the existing car park, landscaping works to improve access and circulation around the park and to restore historic landscape features.

The entire application site is located within the green belt. As set out within this report a proportion of the proposed works are considered to be appropriate development within the green belt. Certain elements such as the new cafe building are deemed to be inappropriate development, however on balance it is considered that very special circumstances are present. This includes saving the listed Grade II cellars, which are on Historic England's Heritage at Risk Register, from further deterioration and potential collapse.

The proposed works are considered to provide a significant level of regeneration to the park, to restore and protect the Listed structures within the park and to improve the character of the immediate locality, including the adjacent green belt land.

As such the proposed development is considered to accord with relevant policies and the application is recommended for approval, subject to relevant conditions.

## 2. RECOMMENDATION

**APPROVAL subject to the following:**

### 1 COM3 Time Limit

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

## REASON

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

### **2 COM4 Accordance with Approved Plans**

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

50027501-CBA-1-GF-DR-L-0001 Rev P1

18910-01 A

18910-03 A

3050-56-SK1A

3050-56-SK2A

3050-56-SK3

3050-56-SK4

3050-56-SK5

3050-56-SK6

535401 PL-102 Rev P3

535401 PL-103 Rev P3

535401 PL-106 Rev P3

535401 PL-200 Rev P3

535401 PL-201 Rev P3

535401 PL-400 Rev P1

535401 PL-401 Rev P3

535401 REP-001 Rev P1

535401 REP-100 Rev P1

535401 PL-101 Rev P5

535401 PL-105 Rev P5

18910-02 B

50027501-CBA-1-GF-DR-L-0110 Rev P2

535401 PL-105 Rev P7; and shall thereafter be retained/maintained for as long as the development remains in existence.

## REASON

To ensure that the development complies with the objectives of Policies within the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

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

Design and Access Statement 50027501-F-DAS-2019-12-13 Dec 2019

Planning Statement Cranford Park

Scope of Services/Utilities 3050-1 Rev A 12th November 2019

Survey Report and Repair Schedule 535401 June 2019

Tree Survey Report for Cranford Park TH 2107 6th September 2019

Historical Statement 50027501-November 2019

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

## REASON

To ensure that the development complies with the objectives of Policies within the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **4 NONSC Further Details**

No development shall take place until the following details have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include information relating to:

- (a) Samples of materials
- (b) Details of the cafe roof parapet, solar fins and canopy
- (c) Detailed design proposals for portholes to the cellar passage
- (d) Detailed repairs specification for the vaulted cellars
- (e) Details and method statement for the retention of the north end original steps with the construction of new enclosed escape stair.
- (f) Details of plant room to vaulted cellar and service runs.
- (g) Details of extent of brickwork removal between piers of the eastern passage and the cellar vaults along with a method statement

#### REASON

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1, DMHB 2 and DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **5 NONSC Sample Panels**

Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel(s) so approved.

#### REASON

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1, DMHB 2 and DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **6 NONSC Re-pointing and Mortar Specification**

A specification of the mortar to be used in the repair of the heritage assets shall be submitted to and approved in writing by the local planning authority. Samples of repointing for the localised repair of the cellar vaults, stable block and curtilage walls and ha-ha shall also be provided on site, and approved in writing by the local planning authority before the relevant part of the works are commenced. The works shall be undertaken in accordance with the approved mortar specification and samples on site.

#### REASON

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **7 NONSC Windows and Doors**

Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors of the cafe and visitors centre shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

#### REASON

To safeguard the special architectural and/or historic interest of the building in accordance

with Policies DMHB 1, DMHB 2 and DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## **8 NONSC Retention of Fabric**

All existing fabric shall be retained unless noted otherwise on the drawings approved under this consent.

### **REASON**

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## **9 COM9 Landscaping (car parking & refuse/cycle storage)**

No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. 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 Hard Surfacing Materials
- 2.b External Lighting
- 2.c Other structures (such as play equipment and furniture)

### **3. Details of Landscape Maintenance**

- 3.a Landscape Maintenance Schedule for a minimum period of 5 years.
- 3.b Proposals for the replacement of any tree, shrub, or area of surfacing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

### **4. Schedule for Implementation**

### **5. Other**

- 5.a Existing and proposed functional services above and below ground
- 5.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 and DMHB 14 the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## **10 NONSC Demolition and Construction Management Plan**

Prior to development commencing, the applicant shall submit a demolition and construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works

- (ii) The hours during which development works will occur.
- (iii) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (iv) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (v) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the construction process.
- (vi) The storage of construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

#### REASON

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

### **11 NONSC Delivery and Servicing Plan**

Prior to occupation of the development, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, delivery, servicing and collection shall be carried out as agreed within this approved plan unless otherwise agreed in writing by the Local Planning Authority.

#### 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).

### **12 NONSC Control of D1 Use**

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 change of use of part of the cellars to D1 Use hereby approved, shall not be used as a religious or any other associated cultural facility or banqueting hall, health centre, day nursery or education use at any time.

#### REASON

To prevent local highway impact in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

### **13 NONSC Archaeology - Written Scheme of Investigation**

No demolition or development shall take place until a Written Scheme of Investigation (WSI) has been submitted to and approved in writing by the local planning authority. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance, research objectives and;

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI. The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited

archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

#### REASON

Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **14 NONSC Archaeology - Foundation Design and Construction Method**

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

#### REASON

Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure physical preservation of the site's archaeological interest, in accordance Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 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 Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) 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.

DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DME 4	Visitor Attractions
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 2	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 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.3	(2016) Sustainable design and construction
LPP 6.13	(2016) Parking
LPP 6.9	(2016) Cycling
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.14	(2016) Improving air quality
LPP 7.16	(2016) Green Belt
LPP 7.3	(2016) Designing out crime
LPP 7.6	(2016) Architecture
LPP 7.8	(2016) Heritage assets and archaeology
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy

### 3

The Written Scheme of Investigation (WSI) will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

The WSI condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

The WSI pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. Without this pre-commencement condition being imposed the application would not comply with NPPF paragraph 199. The archaeological work should include:

#### Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

The GLAAS support the idea of a professional organised community archaeology project rather the purely professional investigations usually seen on commercial development sites.

#### Historic Building Recording

Archaeological building recording is an investigation to establish the character, history, dating, form and development of a an historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes



place. The outcome will be an archive and a report which may be published. This would be analytical recording of the cellar structure to complement the above ground archaeological investigation.

#### Watching Brief

A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive. The watching brief would cover the minor groundworks away from the house and cellars.

### **3. CONSIDERATIONS**

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

Cranford Park is a countryside park of 58 hectares. It is bounded to the north-east by the A312 (The Parkway) and the south-east by Avenue Park. Residential and other urban development lie to the north and south of the Park. To the west there is agricultural land and areas used for gravel extraction. Heathrow Airport lies less than a kilometre to the south west.

The park is bisected by the M4 Motorway into a smaller area to the north and a larger area to the south connected by two subways. The main vehicular access into the park is from the A312. There are several pedestrian access points along the northern and southern boundaries. The River Crane flows along the east edge of the park and the Frog Ditch flows along its western boundary. The area north of the M4 features dense woodland and open meadow areas. The area to the south of the M4 features the historic core of the Park as well as extensive open grassland areas.

The application site is located within the core of the park where there are several historic buildings and structures such as the access bridge, the former stables, the retained cellars and St. Dunstan's Church and graveyard. At present the former stables and the retained cellars are on Historic England's Heritage at Risk Register. Within the site there are also further remnants of the former mansion, the access drive, pleasure grounds, ha-ha wall, orchard, kitchen garden and Cranford Wood. In addition there is a car park, a children's playground and a small, modern building that houses an information centre.

The application site is located within an area of Green Belt, a SINC (Metropolitan Site of Borough Grade II Importance) and lies within the Cranford Park Conservation Area.

#### **3.2 Proposed Scheme**

The key objective of the works to the park are for the regeneration of the park overall with new facilities, to restore the high quality historical core of the park and enhance community use. The proposed works include the following elements:

##### New cafe pavilion and cellars

It is proposed to create a new cafe (Use Class A3) with associated commercial kitchen, toilets and amenity accommodation on the site of the now demolished Cranford House above the retained cellars. The concept for the new cafe building is based on the foundations of the old demolished mansion and the layout of ground floor rooms from the original mansion. Using this as a basis, the voids left by the mansions footprint would be

extruded up, creating blocks in the landscape to illustrate the original footprint of the house and the layout of the rooms. Some of these extrusions will form the new cafe building itself and some will be picked out within the hard and soft landscaping. The new building will also provide access to the cellars, opening up the space to the public and restoring the listed structure. The proposal also includes a part change of use of the cellar for a small quantum of non-cafe related floorspace for museum/exhibition use (Use Class D1).

#### Stable block

Repair of the existing fabric of the building using traditional materials including repointing using lime mortar, replacement spalled bricks using salvaged bricks to match; new roofing slates and lead flashings. New internal works to include refurbishment of all areas providing flexible accommodation and enhancement of existing interaction room which demonstrates the previous stable use of the building plus historical information and artefact. First floors are proposed to be converted to office use (Use Class B1) possibly to be used by the Friends of Cranford Park group or potential commercial use. The stable block walls are proposed to be repaired using traditional materials including repointing in lime mortar.

#### Existing kiosk

It is proposed that the existing kiosk building would be reconfigured internally to provide three public accessible toilets (including one disabled accessible facility) and to provide a new refuse and recycling store attached to the norther facade.

#### Car Park

The existing car park has 39 spaces, including two blue badge spaces. It is proposed to extend and reconfigure the car park to create 10 additional car parking spaces with 4 blue badge spaces. The reconfiguration will create a layout that improves the space for vehicles to manoeuvre safely. Two new motorcycle spaces would also be created. It is proposed to create of 4 active electric vehicle charging points and 11 passive charging points where none currently exist. In addition 10 cycle stands would be provided, with 6 adjacent to St. Dunstan's Church and 4 next to the proposed cafe building.

#### Landscaping

Improved access and circulation around the park with restoration of historic landscape features is proposed. It is intended that this would create an improved sense of arrival and more closely match the historic landscaping scheme as originally laid out, including providing a visual link to the site of the former house and new cafe. As noted above reference to the original ground floor layout of Cranford House would be interpreted and new surface treatments more appropriate for the conservation area are proposed such as a bitumen-bonded gravel surface on the existing road and new flag paving.

The proposals are expected to result in the creation of 10 full time employment opportunities.

### 3.3 Relevant Planning History

14009/APP/2013/2032     Cranford Park Stables East & West Wing   Cranford Lane Harlington  
Listed Building Consent for repairs and renovations to roof, flashing, cladding and interior.

**Decision:** 29-01-2015     Approved

14009/APP/2019/4090     Cranford Park The Parkway Hayes  
The erection of a detached cafe building, outdoor seating area with access, and minor alteration

to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1 extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works (application for listed building consent).

**Decision:**

**Comment on Relevant Planning History**

This application is supported by a parallel Listed Building Consent application for the works to the listed structures:

14009/APP/2019/4090 - The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works (application for listed building consent) - Undetermined

**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 - Consolidated With Alterations (2016)

The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

**Emerging Planning Policies**

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version December 2019)

The Greater London Authority (GLA) consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and

recommendations to the Mayor on 8th October.

The Mayor has considered the Inspectors' recommendations and, on the 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor does not wish to accept. On the 23rd December 2019, the Secretary of State outlined that a response will be due on or before 17th February 2020.

Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the Intend to Publish version of the Plan. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

#### **Part 1 Policies:**

PT1.BE1	(2012) Built Environment
PT1.HE1	(2012) Heritage
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM6	(2012) Flood Risk Management
PT1.EM8	(2012) Land, Water, Air and Noise

#### **Part 2 Policies:**

DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DME 4	Visitor Attractions
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 2	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 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.3	(2016) Sustainable design and construction
LPP 6.13	(2016) Parking
LPP 6.9	(2016) Cycling
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.14	(2016) Improving air quality
LPP 7.16	(2016) Green Belt
LPP 7.3	(2016) Designing out crime
LPP 7.6	(2016) Architecture
LPP 7.8	(2016) Heritage assets and archaeology
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy

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

**5.1** Advertisement Expiry Date:- **5th February 2020**

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

## 6. Consultations

### External Consultees

Consultation letters were sent to 35 local neighbouring owner/occupiers on the 27/12/19 and the application was advertised by way of site notices. The following consultation responses have been received:

#### HESTON RESIDENTS ASSOCIATION

As Chairman of Heston Residents' Association this Planning Application has my full support.

#### CRANFORD PARK FRIENDS GROUP

I am Secretary of Cranford Park Friends and write on behalf of the Committee, which fully welcomes the proposals for the new building and the restoration and up-grading of the others, providing much-needed park facilities. Our group had a presentation on these plans at our AGM, and those present also expressed support. We believe the proposals will make the park more welcoming and will attract a wider cross-section of the local community, which is greatly in need of such resources. They will also enhance, and enable better interpretation of, the park's precious natural environment. One committee member (who was not on the Steering Group) feels the exterior of the cafe building should carry one or two features that help it relate more directly to the house on whose footprint it will stand. There are ways this could be done without significant changes to the basic structure.

#### CRANFORD PARK FRIENDS GROUP Further response

I am on the committee of the Cranford Park Friends group, and I am in favour of the plans to construct a new cafe and to make improvements to the stable block and cellars at the park. I would like to see the park used by as many people as possible. I believe the alterations would make the park more welcoming and interesting to a wider variety of people including young families, whilst not being detrimental to the surrounding natural environment of the park.

#### RECTOR OF CRANFORD

As the Rector of Cranford and having the ancient Parish Church of St Dunstan's adjacent to the proposed development, I am VERY excited about these proposals as are the members of the Parish. People travel some distance to visit the church when it is open on Saturdays during the year and even make arrangements to visit outside these hours. These facilities would add to their enjoyment of their visit to the Park and might very well encourage them to prolong their visit and indeed to come again. I am thrilled at the idea that people visiting the new development might also want to visit one of the most important historical buildings in the London Borough of Hillingdon.

#### CRANE VALLEY PARTNERSHIP

The Crane Valley Partnership (CVP) is an unincorporated association of public, private and third sector organisations that aims to:

- raise awareness and support action for conservation, restoration and new approaches to design and management of the river valley
- help communities take a sustainable approach to managing and improving the River Crane and its tributaries
- improve and protect the biodiversity of the area
- maximise the use of the river corridor as a resource for healthier living and educational activities for local people
- promote connectivity along the river corridor.

For more information on CVP please see: [www.cranevalley.org.uk](http://www.cranevalley.org.uk) I should highlight that my response does not present the collective view of the partner organisations within CVP (which include

the applicant - LB Hillingdon).

Members of CVP will have their own perspectives on the proposal and (I assume) will submit their own responses accordingly if they wish to engage in the planning consultation process. Overall, I am very supportive of the proposals set out in Application 14009/APP/2019/4088 as I believe they will deliver several key benefits compatible with CVP's aims outlined above. The provision of public toilets and a cafe will greatly enhance the park's potential to serve as a gateway and hub site for people wishing to visit and explore the Crane river valley. These new facilities will make the park a more attractive destination for families and will also benefit walkers and cyclists using the London Loop and Hillingdon Trail routes. In my view it would be beneficial to include information on the River Crane and Frogs Ditch in the new package of on-site interpretation so that the historic and environmental significance of the local river system is fully understood and appreciated by visitors.

The fairly limited expansion of the car park (with more disabled bays, 4 electric charging points and ducting for further charging points in future) is welcomed in the context of hosting more visitors, but the applicant (London Borough of Hillingdon) should - from a sustainable transport perspective - also be mindful of the imperative to enhance public transport links to and from the park and the need to liaise with TfL, London Borough of Hounslow and other relevant stakeholders on this key issue.

The success of the redevelopment of the historic core area subject to the current application depends in no small measure on how the proposed new facilities ultimately compliment and support the vision for the wider landscape at Cranford Countryside Park and enhanced active transport links locally. Although not part of the current application area, there are references within the supporting documentation to planned associated works that will affect local watercourses, specifically:

- i) flood alleviation and water quality works (Frogs Ditch)
- ii) improvements to water flow (Frogs Ditch), and
- iii) riverside clearance, restoration to bankside grass and removal of overhanging trees (Crane).

All of these watercourse-focused interventions are welcomed in principle as they have the potential to enhance climate change resilience, biodiversity and/or amenity - but more detailed information is needed in order for me to make useful comments. Likewise, more detail on planned enhancements to active transport routes (particularly on the walking/cycling link going north) would be welcomed.

#### HILLINGDON ARTS ASSOCIATION

The Cranford Park is one of Hillingdon's 'hidden gems' in an area which is heavily urbanised and the Park, when enhanced will be of even greater value to the community than it is now. It has been a neglected green space for many years until more recently, but still lacks the amenities which are enjoyed in similar areas in the North of the borough. Because of its relative isolation it is essential that services such as toilets and parking are adequate for the visiting public and the provision of a cafe will have the potential to bring income to the project and therefore support further community developments on the site where there is great opportunity for drama, art, culture and historical heritage projects. As an Association we are pleased to support this application.

#### HISTORIC ENGLAND

No comments to make on the application.

#### HISTORIC ENGLAND (GLAAS)

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 (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological

interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: Heathrow Area.

As described in the Design and Access Statement, the application lies on the site of Cranford House and Park. The D&A usefully summarises the site's history and archaeological interest with further details provided in two reports on survey and trial excavation by AOC Archaeology in connection with the Cranford Park National Lottery Heritage Fund Project.

Cranford is the site of a medieval village recorded in the Domesday Book. Two medieval moated manors are recorded along with the church which still stands within the park adjacent to the application site. Aerial survey records traces of medieval ridge and furrow cultivation in the parkland. A country house was first built in the 17th century and replaced in the 18th century before being demolished in 1944 leaving only its cellars intact (now listed). Associated stables and historic garden features (e.g. a ha-ha and moated ice house) survive. Although damaged by construction of the M4 motorway and A412, the park retains a sense of local history connecting the modern recreational landscape back to a thousand years of rural Middlesex. Archaeology provides a way of engaging local people with this story and we are supportive of the Council's work with the Friends group on the current NLHF project.

We support the proposed works to conserve and provide access to the listed cellars and reveal the outline of the demolished house. Construction of the new cafe will inevitably involve some disturbance to the surviving footings and floors of the demolished house. This would necessitate sensitive design of the cafe's foundations together with archaeological excavation and recording prior to construction which could be done as a professionally organised community archaeology excavation. Inspection of the cellars themselves identified some apparent phasing of construction and other features worthy of recording as part of the overall archaeological project to understand the house's history.

Other minor groundworks to the car park, access roads and services could reveal features of archaeological interest.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains. However the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. I therefore recommend the following condition on any consent:

No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and;

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological



practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199. The archaeological work should include:

#### Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

As noted above we support the idea of a professional organised community archaeology project rather than the purely professional investigations usually seen on commercial development sites.

#### Historic Building Recording

Archaeological building recording is an investigation to establish the character, history, dating, form and development of a historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published.

This would be analytical recording of the cellar structure to complement the above ground archaeological investigation.

#### Watching Brief

A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

The watching brief would cover the minor groundworks away from the house and cellars.

#### Condition foundation design

I also recommend that the following condition is applied:

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: The planning authority wishes to secure physical preservation of the site's archaeological interest in accordance with the NPPF.

#### Internal Consultees

POLICY TEAM

Green Belt

The whole of the red line boundary falls within the Green Belt. The Local Plan: Part 1 (2012) Policy

EM2 states that any proposals for development in the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test. Paragraph 143 of the NPPF (2019) outlines that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 145 of the NPPF (2019) outlines that there are some forms of development within the Green Belt that are not inappropriate. The minor alterations to the listed buildings are considered to fall under part c) of Paragraph 145, in so far as they are alterations to a building which would not result in disproportionate additions over and above the size of the original building. In addition to internal modifications to convert the information centre into public toilets, there is also a minor extension to accommodate a new bin store. This is also considered to fall under part c) of Paragraph 145. The planning statement also refers to the extension of the existing car park, which is required to facilitate a forecasted increase in the number of visitors. It should be noted however that the proposed 'extension area' would appear to be in long-term use as car parking already and the proposal is simply seeking to formalise this with hard surfacing and markings. This area is already bound by trees and the existing ditch. The formalisation of this area through hard surfacing is therefore considered to constitute limited infilling which would not have a greater impact on the openness of the Green Belt than the existing development and would fall under part g) of Paragraph 145. Very special circumstances are therefore not required for these parts of the proposal.

The applicant has stated that the proposed new cafe building at Cranford Park is proposed solely to support the wider use of the park and should fall under part b) of Paragraph 145. However, the proposal for a new 240 sqm single storey cafe (A3) is considered to constitute inappropriate development in the Green Belt, as this facility would have a greater impact on the openness of the Green Belt. The only built development above ground on the site at the moment is the existing high security fence, which is stated to have been erected in the 1980s. This would be replaced by a cafe which has a greater mass and would not have any views through in the same manner that the gapped palisade fence provides. It should be noted however that the footprint of the cafe with the outdoor seating area would be marginally smaller than the existing fence boundary.

Very special circumstances are therefore required to outweigh this harm to the green belt by reason of inappropriateness, as well as any other harm that the case officer considers to result from the proposal. In doing so, I would advise that the following considerations may outweigh such harm.

The redevelopment of the site as a cafe has been cited in this location in order to save the listed Grade II cellars from further deterioration and potential collapse. Of importance is the fact that they are on Historic England's Heritage at Risk Register. Policy HE1 of the Local Plan: Part 1 (2012) and Policy DMHB 1 of the Local Plan: Part 2 (2020) are explicit that the Council will actively encourage the regeneration and reuse of heritage assets, particularly those which have been included on the Risk Register. The construction of the cafe would have benefits to preventing further deterioration, as it would keep these cellars warm, dry and ventilated. The cafe and associated D1 floorspace would also allow the reuse of the Grade II cellars and promote increased public awareness of their existence. If the cafe was located elsewhere outside of the Green Belt, it would not be able to achieve these benefits.

The cafe and cellars are also a key component of the wider regeneration of the whole of Cranford Park, serving as the main focal point. The Council was successful in a bid to the Heritage Lottery Fund for major improvements to Cranford Park as part of a heritage-led regeneration project. The construction of the cafe however will secure a revenue stream for the park which will reduce its reliance on future grant funding to maintain heritage assets, therefore improving the overall viability of the project.

It should also be noted that the Development Infrastructure Funding Study (DIFS) (2017) for Hayes outlined that there is a need to increase the number of accessible and high quality open spaces in

and near to the Hayes Housing Zone, in order to address the existing shortage and high levels of anticipated new development. The Visitor Observation Study has cited that the lack of refreshment facilities, public toilets and shelter as existing limitations to the quality of the park which would benefit from the proposed cafe and cellars. Furthermore, the increased surveillance from the proposal would aid in discouraging the existing anti-social behaviour that has been noted to date within Cranford Park. The inclusion of these facilities would therefore enhance the network of open spaces in line with Policy EM4 of the Local Plan: Part 1 (2020).

#### B1 Floorspace

The proposal includes the refurbishment and change of use of the stables to create a small quantum of B1 floorspace, which is defined as a main town centre use within Annex 2 of the NPPF (2019). Paragraph 86 outlines that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Local Plan: Part 2 (2020) Policy DME 3 (Part F) also establishes that a proposal in this location is required to demonstrate that no other sequentially preferable locations are available.

A sequential test should therefore establish that the suitability of more central sites to accommodate the proposal have been considered. Importantly, the change of use is required in order to ensure the Grade II listed stables, which are on the at Risk Register, are restored and can be reused in viable manner moving forward, in line with Policy HE1 of the Local Plan: Part 1 (2012) and Policy DMHB 1 of the Local Plan: Part 2 (2020). Two of the rooms would also be operated as offices for the Site Manager, Community Engagement Officer and Apprentice, with one room available as an office and meeting place for the Cranford Park Friends. The National Planning Policy Guidance (NPPG) Paragraph 012 establishes that certain main town centres uses have particular locational requirements which may mean they may only be accommodated in specific locations and that this should be considered in the sequential test. It is therefore clear that there could not be another suitable sequentially preferable location that would allow the restoration of the Grade II listed stables and effectively ensure the management of Cranford Park. It is therefore concluded that a wider sequential search is not required.

#### A3 and D1 Floorspace

The proposal includes a new cafe (A3) and part change of use of the cellar for a small quantum of D1 floorspace. The redevelopment of the site as a cafe has been cited in this location in order to save the listed Grade II cellars from further deterioration and potential collapse. Notably these are on Historic England's Heritage at Risk Register. Policy HE1 of the Local Plan: Part 1 (2012) and Policy DMHB 1 of the Local Plan: Part 2 (2020) are explicit that the Council will actively encourage the regeneration and reuse of heritage assets, particularly those which have been included on the Risk Register. Furthermore, this site will be a focal point for the wider regeneration of Cranford Park and will assist in improving the quality of an important piece of open space, which is particularly important noting the forecasted growth in Hayes. Therefore there is no objection to their inclusion.

#### ACCESS OFFICER

1. The proposed number of accessible parking bays should be increased from 4 to 5 in accordance with the Council's UDP (Saved Policy) AM15.
2. Whilst making good/retaining the Heritage stone setts around the central lawn, the opportunity should be taken for uneven stones to be relaid and/or repointed to create a more desirable surface for older and ambulant disabled people. It is also strongly recommended that an alternative surface around the lawn, such as resin bonded gravel, is introduced alongside the stone setts to provide wheelchair users with a smooth surface.
3. The accessible toilet should be increased in size to provide internal dimensions of no less than 2.2 m by 1.7 m wide in accordance with BS 8300-1: 2018.

4. The proposed vertical platform lift should be carefully selected to ensure that its features and controls mimic those of a conventional passenger lift. It is especially important to ensure that the lift:

- door opens automatically;
- call buttons require only a single momentary 'press', rather than continuous pressure;
- buttons inside the lift car/enclosure require a single momentary 'press' to allow travel between floors;
- emergency call/alarm system is robust, with a suitably loud sounder/communication aid which can be heard in a busy public environment;
- can be manually operated in the event of a breakdown, and/or a suitable term contract put in place to ensure a rapid engineer response. Measures must be in place to ensure that disabled people do not become stranded should the lift suffer a breakdown.

Conclusion: further details are requested.

#### Case Officer comments

The above comments were provided to the applicant who has amended the proposals where possible and explained the reason why other suggestions are not feasible.

#### ACCESS OFFICER 2nd comments

In light of the additional information regarding the need to provide dedicated electric charging parking bays, it would be acceptable to provide 4, not 5, accessible parking bays.

In respect of the requested accessible toilet enlargement, plans PL-101 and PL-105 (revision P5) demonstrate compliance with BS 8300:2018.

Conclusion: no further comments are deemed necessary from an accessibility standpoint.

#### FLOOD AND WATER MANAGEMENT

No objections to the minor alterations and extensions to existing buildings.

Although the overall site size is large the works proposed are limited. It is noted the new cafe will have a green roof reducing run off from the site, and the car park extension will drain to a soakaway.

#### LANDSCAPE ARCHITECT

This site comprises a relatively small area within Cranford Park, including The Stables, the footprint of the original house, the car park and associated areas of hard landscape (driveway and walls) and soft landscape (trees and grass). The site is Council-owned and has no TPO's, however, trees are protected by virtue of their location within Cranford Park Conservation Area. The site lies within the Green Belt and is a SINC (Metropolitan Site of Borough Grade II Importance). This area is at the heart of the developed part of a current Heritage Lottery Fund (HLF) bid.

The proposal is supported by a Tree Report by THAC Ltd, which includes park and woodland trees beyond the subject of the planning application. Trees relating to the planning application include some of those in Area A (T7,9,11,13,14,15,16 and 17 on the schedule), Area B (T1,2,3,4,G5 and T6) and part of Area E (T7,11,12,36 and 38). Identified tree work required falls into two categories; trees to be removed to restore views / highlight specific historic trees and those to be removed for reasons of sound management regarding health and safety. The work required for management reasons will be re-assessed and prioritised according to need and budget, by LBH's tree manager. Aside from tree-related work, the HLF project will include hard and soft landscape enhancements within the red line of the application site in order to improve parking, accessibility, wayfinding and the historic setting.

No objection subject to landscape condition.

## HIGHWAYS

The application site is situated in close proximity to the M4 / A312 Junction 3. The northern boundary of the site is formed by the M4 with the A312 to the east. To the south and west the application site is surrounded by Cranford Park itself. Immediately north of the site is a subway under the M4 motorway. The sole access to the site is along a narrow track with a paved bitumen macadam surface. This track leads off the M4 J3 gyratory and is approximately 450 metres in length. It should be noted that the M4 J3 itself is within the London Borough of Hounslow.

Transport for London use as system called PTAL (Public Transport Accessibility Level) to measure access the public transport network. PTAL assesses walk times to the nearest public transport location taking into account service frequency. The location is then scored between 0 and 6b where 0 is the worst and 6b the best.

According to the Transport for London WebCAT service the application site has a PTAL ranking of 0 indicating access to public transport is very poor compared to London as a whole suggesting that there will be a strong reliance on the private car for trip making.

The development proposed forms part of a wider project to enhance Cranford Park and make it a more attractive place to visit and enjoy. In response to the expected increase in visitor numbers it is proposed to extend the existing car park from 39 car parking spaces to 49. The new car parking will include 2 spaces for motorcycles, 4 wheelchair accessible spaces for disabled people and 4 spaces provided with active electric vehicle charging points (and 11 passive electric vehicle charging points). In addition 10 cycle stands will be provided. These cycle stands should be traditional 'Sheffield' stands preferably not type indicated in the Design and Access Statement. As part of the development a new mini-bus turning circle with a set down/pick up stop will be provided. The increase in the total number of car parking spaces proposed as well as the quantum of bicycle, motorcycle, disabled, parking spaces with electric vehicle charging points are broadly in accordance with Local Plan: Part 2 Development Management Policies (2020) DMT 6: Vehicle Parking and considered acceptable.

It is noted from the Design and Access Statement that the entrance road from the A312 will be widening to improve car passing space together with a vehicle turning area and mini-bus parking. The Highway Authority welcomes these facilities.

Taking into account that access to the site is gained from the M4 J3 the Highway Authority require that a Construction Logistics Plan is provided, this should be based upon the Guidance provided by Transport for London available at

<http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf> and should be secured by way of a suitably worded condition.

The Highway Authority requires further detail regarding how deliveries to the site will be made or how refuse would be collected. It is therefore necessary that a Service and Delivery Plan is submitted, this should be drafted based on the guidance produced by TfL tailored to the development and local circumstances available:-

<http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

There are no highway objections to this planning application.

## CONSERVATION AND DESIGN OFFICER

Cranford Countryside Park is located to the north easterly location of Heathrow Airport close to Junction 3 of the M4 Motorway. The area is a highly valued green space in an urban location but is underutilised and in some areas is in a dilapidated condition. The M4 Motorway has divided the Park into two parts. The smaller northern portion has dense woodland and open meadow areas. Whereas in the larger southern portion can be found the historic core of the Park as well as

extensive open grassland areas. This larger portion forms the Cranford Park Conservation Area. The two areas are connected via subways under the M4.

The application for listed building consent seeks consent to construct a detached cafe building / seating area with the provision of new lift and stair access into the listed cellars beneath. The proposals also include minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of a bin store including all associated external works. The proposals form part of a wider refurbishment and regeneration strategy for the park overall to enhance community use.

In December 2017, Hillingdon Council was successful in its Round 1 Bid to the Heritage Lottery Fund (HLF) for major improvements to Cranford Park. These included: repair of the historic buildings and structures, re-use of the Stables and the Cellars, the building of a new cafe with toilet facilities, the restoration of the historic landscape and improvements to biodiversity. Also included were two play areas, a circular cycling/walking track, improved and new parking areas, improved signage, interpretation and safety measures and an Activity Plan which includes events for visitors and a programme of volunteer participation.

At the core of the Park there are several historic buildings and structures as well as remnants of the former mansion, the access drive, Pleasure Grounds, Ha-Ha wall, Orchard, Kitchen Garden and Cranford Wood. There is also a small, modern building that houses an information centre, a car park and a small children's playground.

The heritage assets include nine listed buildings, all Grade II, on and around Cranford House. These are: The Stables, the Cellars of Cranford House, the bridge over the River Crane, the Ha-Ha, St. Dunstan's Church (grade II\*), the five metre high Churchyard wall which adjoins the Stables, the walls to the north and south of the Stables on the western side and the long garden walls of the kitchen garden.

The park originally dates from the 1600s, however the main mansion and stable block was constructed in the 1700s. The house was demolished in 1945 but the red brick vaulted cellars (grade II) were, fortunately, left relatively intact. They are currently inaccessible to the public being accessed via a heavy metal trap door and cordoned off with intrusive security fencing for health safety concerns. Fortunately the cellars are in relatively good condition, although some areas of demolition rubble from the original house can be found within.

The stable block also remains in a relatively good condition despite a fire which resulted in some damage to the eastern portion internally. Some repairs have been undertaken in recent times to keep the building water tight until such a time that a future use for the building could be found.

The grade II listed cellars and stable block as well as the Cranford Park Conservation Area are included on Historic England's Heritage at Risk Register due to their deteriorating condition. A number of pre-application discussions have taken place prior to the submission of this application to discuss the proposed new cafe, repairs to the heritage assets and new uses for the vaulted cellars and stable block. The proposals are now considered acceptable in conservation terms subject to conditions.

The concept for the new cafe building is based on the foundations of the old demolished mansion and the layout of ground floor rooms from the original mansion. Using this as a basis, the voids left by the mansions footprint would be extruded up, creating blocks in the landscape to illustrate the original footprint of the house and the layout of the rooms. Some of these extrusions will form the new cafe building itself and some will be picked out within the hard and soft landscaping. This will help with the interpretation of the site and will create an interesting feature within the landscape.

The cafe building is to a contemporary design that will sit quietly and complement the historic setting. The use of brick as a primary construction material along with Corten elements such as solar fins, solar shading canopy and plant enclosure would complement the colour and tones of the existing historic structures and would result in a building that would not compete with stable block and remaining curtilage walls. The detailed design of the building will need to be agreed along with material samples.

The cellars will be connected to the cafe building via steps and a lift which will be located in the same place as the original servant's steps. This will allow the vaults to have a number of flexible uses such as events, cinema, private hire and exhibitions. It is intended that the cellars will remain relatively unaltered except with some localised opening up works and upgrades for M&E lighting, ventilation, power and some glazed portholes for natural light.

The long eastern barrel vaulted passage way will be lit by a series of rooflight portholes. These will be installed without compromising the integrity of the brick barrel vaulted structure with the use of a core drill. The portholes will help to naturally light a timeline within the corridor detailing Cranford Park's history. The detailed design of the bespoke portholes will need to be agreed by condition so that they are discreet additions that respect their historic setting and appearance of the barrel vaulted passageway.

The other internal works will see the creation of a plant room which will be retained within three of the vaulted bays. The detailed design of this enclosure and the M&E runs will need to be agreed by condition as there is currently insufficient information submitted with the application.

The other intervention would be the removal of some of the brickwork between the piers that divide the eastern passage with the main vaulted rooms. This will allow for easier and inclusive access so that the vaulted space and any future events can be enjoyed by all. The extent of brick work and the method for its removal will need to be agreed by condition.

The existing 'trap door' entrance into the cellar at the north end of the cellar will be converted to an escape stair. This will be enclosed in Corten cladding that should sit discretely at the southern end of the walled garden.

The existing stable block would remain as its current configuration with some alterations and refurbishments for craft workshops, interpretation and museum as well as a commercial use to the first floor. These works will generally be of a light touch that will primarily see the building sympathetically repaired to bring it back into use helping to secure its future for the long term.

The submitted Survey Report and Repair Schedule details the repair of the other listed structures found within the park. It acknowledges that the garden walls are generally in good condition although some areas are covered by vegetation including ivy. The ha-ha is in reasonable condition although some areas have collapsed or in need of rebuilding. The bridge over the River Crane is in good condition and no repairs are proposed.

The proposed new cafe with access to the vaults to create a flexible space along with the repair of the stable block, new landscaping and the creation of the visitor centre as well as the repair of the other listed structures will be a positive enhancement to Cranford Park. The proposals would be of benefit to both local people and visitors to the area and help to safeguard the heritage assets for the long term.

Another positive benefit of the proposals would be that once the works are complete the structures and conservation area would be removed from Historic England's Heritage at Risk Register.

Suggested conditions:

### 1. Submission of Details

Detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority before the relevant part of the works is begun, and the works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:

- (a) Samples of materials
- (b) Details of the cafe roof parapet, solar fins and canopy
- (c) Detailed design proposals for portholes to the cellar passage
- (d) Detailed repairs specification for the vaulted cellars
- (e) Details and method statement for the retention of the north end original steps with the construction of new enclosed escape stair.
- (f) Details of plant room to vaulted cellar and service runs.
- (g) Details of extent of brickwork removal between piers of the eastern passage and the cellar vaults along with a method statement

Reason

To safeguard the special architectural and/or historic interest of the building

### 2. Sample panels required

Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel(s) so approved.

Reason

To safeguard the special architectural and/or historic interest of the building

### 3. Sample of re-pointing and mortar specification

A specification of the mortar to be used in the repair of the heritage assets shall be submitted to and approved in writing by the local planning authority. Samples of repointing for the localised repair of the cellar vaults, stable block and curtilage walls and ha-ha shall also be provided on site, and approved in writing by the local planning authority before the relevant part of the works are commenced. The works shall be undertaken in accordance with the approved mortar specification and samples on site.

Reason

To safeguard the special architectural and/or historic interest of the building

4. Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors of the cafe and visitors centre shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

Reason

To safeguard the special architectural and/or historic interest of the building

### 5. Retention of fabric

All existing fabric shall be retained unless noted otherwise on the drawings approved under this consent.

Reason

To safeguard the special architectural and/or historic interest of the building



## **7. MAIN PLANNING ISSUES**

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

All of the proposed development site is designated as Green Belt, which is a critical constraint in terms of the acceptability of the proposals. The Council's Policy Team have considered the submitted documentation and provided detailed comments raising no objection to the application.

The Local Plan: Part 1 (2012) Policy EM2 states that any proposals for development in Green Belt will be assessed against national and London Plan policies, including the very special circumstances test. Paragraph 143 of the NPPF (2019) outlines that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. There are several aspects the proposed scheme which can be considered in turn with regards to whether they are acceptable in principle.

Paragraph 145 of the NPPF (2019) outlines that there are some forms of development within the Green Belt that are not inappropriate. The minor alterations to the listed buildings and internal modifications to convert the information centre into public toilets, plus a minor extension to accommodate a new bin store are considered to fall under part c) of Paragraph 145, in so far as they are alterations to a building which would not result in disproportionate additions over and above the size of the original building. The proposed 'extension area' to the car park and the formalisation of this area through hard surfacing is considered to constitute limited infilling which would not have a greater impact on the openness of the Green Belt than the existing development. As such it would fall under part g) of Paragraph 145. Very special circumstances are therefore not required for these parts of the proposal.

The proposal for a new 240m<sup>2</sup> single storey cafe (A3) is considered to constitute inappropriate development in the Green Belt, as this facility would have a greater impact on the openness of the Green Belt. The existing high security fence is to be replaced by the cafe which has a greater mass and would not have any views through in the same manner that the palisade fence provides. It should be noted however that the footprint of the cafe with the outdoor seating area would be marginally smaller than the existing fence boundary. Very special circumstances are therefore required to outweigh this harm to the green belt by reason of inappropriateness.

The redevelopment of the site as a cafe has been cited in this location in order to save the listed Grade II cellars from further deterioration and potential collapse. Of importance is the fact that they are on Historic England's Heritage at Risk Register. Policy HE1 of the Local Plan: Part 1 (2012) and Policy DMHB 1 of the Local Plan: Part 2 (2020) are explicit that the Council will actively encourage the regeneration and reuse of heritage assets, particularly those which have been included on the Risk Register. The construction of the cafe would have benefits to preventing further deterioration, as it would keep these cellars warm, dry and ventilated. The cafe and associated D1 floorspace would also allow the reuse of the Grade II cellars and promote increased public awareness of their existence. If the cafe was located elsewhere outside of the Green Belt, it would not be able to achieve these benefits.

The cafe and cellars are also a key component of the wider regeneration of the whole of Cranford Park, serving as the main focal point. The construction of the cafe however will secure a revenue stream for the park which will reduce its reliance on future grant funding to maintain heritage assets, therefore improving the overall viability of the project.

The Development Infrastructure Funding Study (DIFS) (2017) for Hayes outlined that there is a need to increase the number of accessible and high quality open spaces in and near to

the Hayes Housing Zone, in order to address the existing shortage and high levels of anticipated new development. The Visitor Observation Study has cited that the lack of refreshment facilities, public toilets and shelter as existing limitations to the quality of the park which would benefit from the proposed cafe and cellars. Furthermore, the increased surveillance from the proposal would aid in discouraging the existing anti-social behaviour that has been noted to date within Cranford Park. The inclusion of these facilities would therefore enhance the network of open spaces in line with Policy EM4 of the Local Plan: Part 1 (2020).

The proposal includes the refurbishment and change of use of the stables to create a small quantum of B1 floorspace, which is defined as a main town centre use in the NPPF (2019). Paragraph 86 outlines that local planning authorities should apply a sequential test to planning applications for main town centre uses which are not in an existing centre. Local Plan: Part 2 Policy DME 3 also establishes that a proposal in this location is required to demonstrate that no other sequentially preferable locations are available.

A sequential test should therefore establish that the suitability of more central sites to accommodate the proposal have been considered. Importantly, the change of use is required in order to ensure the Grade II listed stables, which are on the at Risk Register, are restored and can be reused in viable manner moving forward, in line with Policy HE1 of the Local Plan: Part 1 (2012) and Policy DMHB 1 of the Local Plan: Part 2 (2020). Two of the rooms are proposed to be operated as offices for the Site Manager, Community Engagement Officer and Apprentice, with one room available as an office and meeting place for the Cranford Park Friends. It is therefore clear that there could not be another suitable sequentially preferable location that would allow the restoration of the Grade II listed stables and effectively ensure the management of Cranford Park. It is therefore concluded that a wider sequential search is not required.

The proposal includes a new cafe (A3) and part change of use of the cellar for a small quantum of non-cafe related floorspace for exhibition or museum related space (Use Class D1). The redevelopment of the site as a cafe has been cited in this location in order to save the listed Grade II cellars from further deterioration and potential collapse. Notably these are on Historic England's Heritage at Risk Register. Policy HE1 of the Local Plan: Part 1 (2012) and Policy DMHB 1 of the Local Plan: Part 2 (2020) are explicit that the Council will actively encourage the regeneration and reuse of heritage assets, particularly those which have been included on the Risk Register. Furthermore, this site will be a focal point for the wider regeneration of Cranford Park and will assist in improving the quality of an important piece of open space, which is particularly important noting the forecasted growth in Hayes.

The proposed D1 Use is considered acceptable given the scale proposed and its links to the wider park in terms of the historical information is it intended to propose. However alternative D1 uses would not be deemed appropriate, such as a health centre or nursery and as such a condition is recommended to control the use approved.

Subject to condition the proposed development is therefore considered to be acceptable and in accordance with Policies HE1, EM2 and EM4 of the Local Plan: Part 1 (2012), Policy DMHB 1 of the Local Plan: Part 2 (2020) and the NPPF.

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

Not relevant to the determination of the application.

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

ARCHAEOLOGY

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 proposed development has been examined by the Greater London Archaeological Advisory Service (GLAAS) who have confirmed their support for the proposals and recommended archaeological requirements in terms of proposed conditions should the application be approved. These conditions are recommended to be attached to any grant of planning consent.

The proposed development is therefore deemed to accord with Policy DMHB 7 of the Local Plan: Part 2 - Development Management Policies (2020) and the London Plan (2016).

#### CONSERVATION AREA AND LISTED BUILDINGS

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 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.

Policy DMHB 2 states that applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutory Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in

terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on the significance. The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required. Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Policy DMHB 4 requires that new development, including alterations and extensions to existing buildings, within a Conservation Area, 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.

The application site is within the designated Cranford Park Conservation Area and has a number of Listed Buildings located on site. These include the access bridge, the former stables, the retained cellars and St. Dunstan's Church and graveyard. There are also further remnants of the former mansion, the access drive, pleasure grounds, ha-ha wall, orchard and kitchen garden in the immediate locality.

The proposed new cafe with access to the vaults to create a flexible space along with the repair of the stable block, new landscaping and the creation of the visitor centre as well as the repair of the other listed structures will be a positive enhancement to Cranford Park. The proposals would be of benefit to both local people and visitors to the area and help to safeguard the heritage assets for the long term.

A significant positive benefit of the proposals would be that once the works are complete the statutory Listed structures within the Conservation Area that are currently on the Historic England's Heritage at Risk Register would be removed from this list.

Historic England (GLAAS) and the Council's Conservation and Design Officer have reviewed the proposals and provided comments in support of the application. Subject to conditions they raise no objection to the proposals.

As such it is considered the proposed development accords with Policies DMHB 1, DMHB 2 and DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **7.04 Airport safeguarding**

Not relevant to the determination of the application.

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

The entire application site is located within the green belt. The impact of the proposed development on the function of the green belt is considered in detail within Section 7.01 'The Principle of Development' of this report.

As set out above a proportion of the proposed works are considered to be appropriate development within the green belt in accordance with paragraph 145 of the NPPF. Certain elements such as the new cafe building are deemed to be inappropriate development,

however on balance it is considered that very special circumstances are present which outweigh any harm to the greenbelt. The redevelopment of the site as a cafe has been cited in this location in order to save the listed Grade II cellars from further deterioration and potential collapse. Of importance is the fact that they are on Historic England's Heritage at Risk Register. Policy HE1 of the Local Plan: Part 1 (2012) and Policy DMHB 1 of the Local Plan: Part 2 (2020) are explicit that the Council will actively encourage the regeneration and reuse of heritage assets, particularly those which have been included on the Risk Register.

The proposed works are considered to provide a significant level of regeneration to the park, to restore and protect the Listed structures within the park and to improve access and the character of the immediate locality, including the green belt.

The proposed development is therefore deemed in accordance with Policy HE1 of the Local Plan: Part 1 (2012), Policy DMHB 1 of the Local Plan: Part 2 (2020) and the NPPF.

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

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

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 undesignated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

The new cafe pavilion will be a detached structure, located in part in the original location of the demolished mansion and over the existing cellars. The cafe will provide level access to the ground floor, containing the cafe seating area, ancillary kitchen accommodation and cafe toilets. There will be a vertical core allowing access to the cellars from within the pavilion, via staircase and lift. The building would be 25.6m long running north to south and the majority of the building would be 10m wide, however an entrance area to the east would add a further 3.2m in width for a 9m long section. The new cafe would be flat roofed at 3.4m high, plus a small section of plant that would be an additional 1.1m in height.

The proposed cafe would be of modest size, being of about 240 square metres and single storey. Included in this footprint is the solid kitchen, the part glazed dining area with brise soleil, external staircase, lift and toilets and an outside sitting area under a pergola. The materials would be primarily of brick, partially clad in Corten (including the plant), with glazing and a green roof. The applicant's advise that 'special attention has been paid to its design with the aim being a modern and attractive exterior, of sufficient quality to provide the end stop of long views down the driveway, but a building which would harmonise with its surroundings, its colour palette respecting the red brick walls of the courtyard and

stables'.

The proposed new cafe with access to the vaults to create a flexible space along with the repair of the stable block, new landscaping and the creation of the visitor centre as well as the repair of the other listed structures will be a positive enhancement to Cranford Park and the character and appearance of the local area. The proposals would be of benefit to both local people and visitors to the area and help to safeguard the heritage assets for the long term.

The Council's Conservation and Design Officer has reviewed the proposals and provided comments in support of the application. Subject to conditions they raise no objection to the proposals.

As such it is considered the proposed development accords with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

Policy DMHB 11 of the 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.

The proposals would be located some 160m from the closest residential neighbours, on the opposite side of the M4 Motorway. While there may be some increase in vehicle movements associated with the proposed works this would enter the existing road network at the Parkway Roundabout and as such is unlikely that this would result in any perceptible difference to residents.

As such it is considered that the proposal does 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**

Not relevant to the determination of the application.

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

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

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. 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.

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments 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 5 of the Local Plan: Part 2 - Development Management Policies (2020) states that 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 and that cycle parking and changing facilities are provided.

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

The National Planning Policy Framework (NPPF) 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 6.3 of the London Plan requires development proposals to ensure that the impacts on transport capacity and the transport network are fully assessed.

The site is situated in close proximity to the M4 / A312 Junction 3 and the sole vehicle access is along a narrow track with a paved bitumen macadam surface. This track leads off the M4 J3 gyratory and is approximately 450 metres in length. The application site has a PTAL ranking of 0 indicating access to public transport is very poor compared to London as a whole.

The development proposal forms part of a wider project to enhance Cranford Park and make it a more attractive place to visit and enjoy. In response to the expected increase in visitor numbers it is proposed to extend the existing car park from 39 car parking spaces to 49. The new car parking would include 2 spaces for motorcycles, 4 wheelchair accessible spaces for disabled people and 4 spaces provided with active electric vehicle charging points (and 11 passive electric vehicle charging points). In addition 10 cycle stands would be provided. As part of the development a new mini-bus turning circle with a set down/pick up stop will be provided. The increase in the total number of car parking spaces proposed as well as the quantum of bicycle, motorcycle, disabled, parking spaces with electric vehicle charging points are broadly in accordance with Local Plan: Part 2 Development Management Policies (2020) DMT 6: Vehicle Parking and considered acceptable.

The Council's highways Engineer has reviewed the proposals and raises no objection to the application subject to conditions that require the submission of a Construction Logistics Plan and a Service and Delivery Plan to be submitted and approved by the Council. It is noted that the entrance road from the A312 will be widened to improve car passing space together with a vehicle turning area and mini-bus parking. The Highway Authority welcomes these facilities.

The proposals are therefore deemed to be in accordance with Policies DMT 1, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), the National Planning Policy Framework (NPPF) and Policy 6.3 of the London Plan (2016).

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

Policy DMHB 15 of the Local Plan: Part 2 - Development Management Policies (2020) requires all new development to ensure safe and attractive public and private spaces.

At present the park is underused and suffers from anti-social behaviour and a lack of natural surveillance. The lack of refreshment facilities, public toilets and shelter are considered as existing limitations to the quality of the park as a visitor destination. It is considered that the increased surveillance from the proposed cafe and refurbished stable

block buildings, as well as increased visitor footfall would aid in discouraging the existing anti-social behaviour that has been noted to date within Cranford Park. The inclusion of these facilities would therefore enhance the security of the area in line with Policy DMHB 15 of the Local Plan: Part 2 - Development Management Policies (2020).

#### **7.12 Disabled access**

Policy 7.2 of the London Plan (March 2016) requires that the all new development provides the highest standards of accessible and inclusive design.

It is proposed that the existing kiosk building would be reconfigured internally to provide three public accessible toilets, including one disabled accessible facility. The number of blue badge car parking spaces would be increased from two to four and the existing hard landscaping and surface treatments will be refurbished and improved for greater accessibility.

The Council's Access Officer has reviewed the proposed development and following amendments to the proposed new public toilets they have confirmed they have no objection to the submitted details or to the proposed scheme. Therefore the proposed scheme is considered to be in accordance with Policies 3.8 (Housing Choice) and 7.2 (Inclusive Environment) within the London Plan (2016).

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

Not relevant to the determination of the application.

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

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

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:

A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The site is Council-owned and has no TPO's, however, trees are protected by virtue of their location within Cranford Park Conservation Area. The site lies within the Green Belt and is a SINC (Metropolitan Site of Borough Grade II Importance).

The identified tree work required falls into two categories; trees to be removed to restore views / highlight specific historic trees and those to be removed for reasons of sound management regarding health and safety. In total 5 trees are proposed to be removed, 4 that block the historical views and 1 that is required to be removed in order to facilitate the extension to the car park. Two new trees are proposed at the entrance to the car park to partially mitigate against this loss. Whilst there is a loss of three trees overall the Council's Landscape Architect has confirmed that they have no objection to this work being carried out. In addition it is worth noting that there are a significant number of mature trees within the immediate and wider area. Within the small section of the park that sits within the red



line boundary of the application there are over 20 trees that would be retained and hundreds more trees are within the wider park. In this context the loss of three trees as part of the park enhancement works is considered acceptable.

Aside from tree-related work, the HLF project will include hard and soft landscape enhancements in order to improve parking, accessibility, wayfinding and the historic setting. It is proposed that bat roosts will be provided within the existing stable block roof.

The Council's Landscape Architect has reviewed the submitted details and raised no objections to the proposals subject to additional information being required with regards to proposed surface materials and management and maintenance of landscaping. These details are recommended to be secured by condition and therefore subject to conditions the scheme is deemed to be in accordance with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) and the London Plan (2016).

#### **7.15 Sustainable waste management**

London Plan Policy 5.17 and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) require adequate provision to be made for refuse and recycling facilities for new development.

It is proposed that a large new refuse and recycling store would be attached to the norther facade of the existing kiosk building. In addition it is recommended that a Delivery and Servicing Plan be required via an appropriately worded condition should the application be approved.

As such the proposal is considered to be in accordance with London Plan Policy 5.17 and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

#### **7.16 Renewable energy / Sustainability**

Policy 5.3 of the London Plan requires development proposals to demonstrate sustainable design standards are integral to the proposal. It requires major development proposals to meet minimum sustainable design standards set out in the Mayor's SPG.

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).

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that all developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

The new cafe will conform to Part L of the building regulations to the highest level by incorporating fully insulated floor slab, walls and roof zones, utilising dual flush toilets and taps with hot water heated via air-source heat pumps via insulated flow and return pipes. In addition a green roof on single ply membrane is proposed.

As such the scheme is considered to accord with Policy 5.3 of the London Plan, Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **7.17 Flooding or Drainage Issues**

Policy 5.12 of the London Plan (March 2016) requires that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development.

Policy 5.13 of the London Plan (March 2016) states that development should 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 EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

The proposed development is within Flood Zone 1 which is the zone at the lowest risk of flooding. The Council's Flood and Water Management Officer reviewed the submitted details and confirmed that they have no objections to the proposals nor require any conditions be added should the application be approved. The works proposed are limited and they note that the new cafe will have a green roof reducing run off from the site and that the car park extension will drain to a soakaway.

Therefore the proposed scheme is deemed to accord with Policies 5.12 and 5.13 of the London Plan (March 2016), Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

### **AIR QUALITY**

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 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 7.14 of the London Plan (March 2016) further supports this.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 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 application site is within an air quality management area. It is proposed that the new cafe will be powered by an Air Source Heat Pump, as will the Stables, and that this will provide all energy requirements. There is no gas supply to the site, and the application confirms that this arrangement is not planned to be changed. Moreover, the new cafe will

be insulated to a high specification to protect it from the cold in winter, with brise soleil and natural ventilation to protect the glazed seating area from high temperatures in summer.

In addition, at present the car park has no electric vehicle charging points. It is proposed that 4 active charging points and 11 passive charging points will be introduced as part of the proposals as well as additional cycle parking to encourage sustainable forms of transportation.

As such there are no concerns raised in terms of air quality and the application is considered to accord with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### NOISE

The Government's National Planning Policy Framework (NPPF) gives the Government's guidance on noise issues. Policy 7.15 of the London Plan (2016) seeks to reduce noise and minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

The proposals would be located some 160m from the closest residential neighbours and therefore the development is not considered likely to have any impact on the occupiers of these properties. The site is within close proximity of the M4 Motorway, however there is significant mature landscaping which shields the site acoustically.

Therefore no concerns are raised with regards to any detrimental impact from noise and the scheme is deemed to accord with Policy 7.15 of the London Plan (2016).

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

All comments received in relation to the proposals have been in support of the application.

#### **7.20 Planning obligations**

Policy DMCI 7 of the Local Plan: Part 2 Development Management Policies (2020) is concerned with securing planning obligations to supplement the provision of recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. This policy is supported by more specific supplementary planning guidance.

Should the application be approved, no planning obligations are considered to be required to mitigate against any detrimental impacts of the proposed development. As such the scheme is deemed to accord with Policy DMCI 7 of the Local Plan: Part 2 Development Management Policies (2020).

#### Community Infrastructure Levy (CIL)

The Council has adopted its own Community Infrastructure Levy (CIL). However the application is not Hillingdon CIL liable with respect to new floorspace being created due to the use class proposed.

In addition to the London Borough of Hillingdon CIL, the Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 per square metre of gross internal floor area for schemes over 100m<sup>2</sup> to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable for the 240m<sup>2</sup> with respect to new floorspace being created.

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

None

## **7.22 Other Issues**

None

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

### **General**

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

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

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

### **Planning Conditions**

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

### **Planning Obligations**

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

### **Equalities and Human Rights**

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

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

circumstances.

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

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

Not applicable

## **10. CONCLUSION**

This application proposes works within Cranford Park to assist with the regeneration of the park by providing new facilities and to restore its historic core. It is proposed to repair the existing Grade II Listed Stable Block building, including refurbishment to provide flexible accommodation with the first floors converted to commercial use (Use Class B1). Also a new cafe (Use Class A3) with associated commercial kitchen, toilets and amenity accommodation is proposed above the Grade II Listed cellars of the former (now demolished) Cranford House. Access and refurbishment of the cellars is proposed for use linked to the new cafe building and also a part change of use of the cellar for a small quantum of non-cafe related floorspace for use as a museum/exhibition (Use Class D1). The existing kiosk building is proposed to be adapted for additional public toilets and further works are proposed that include a refurbishment and extension to the existing car park, landscaping works to improve access and circulation around the park and to restore historic landscape features.

The entire application site is located within the green belt. As set out within this report a proportion of the proposed works are considered to be appropriate development within the green belt. Certain elements such as the new cafe building are deemed to be inappropriate development, however on balance it is considered that very special circumstances are present. This includes saving the listed Grade II cellars, which are on Historic England's Heritage at Risk Register, from further deterioration and potential collapse.

The proposed works are considered to provide a significant level of regeneration to the park, to restore and protect the Listed structures within the park and to improve the character of the immediate locality, including the adjacent green belt land.

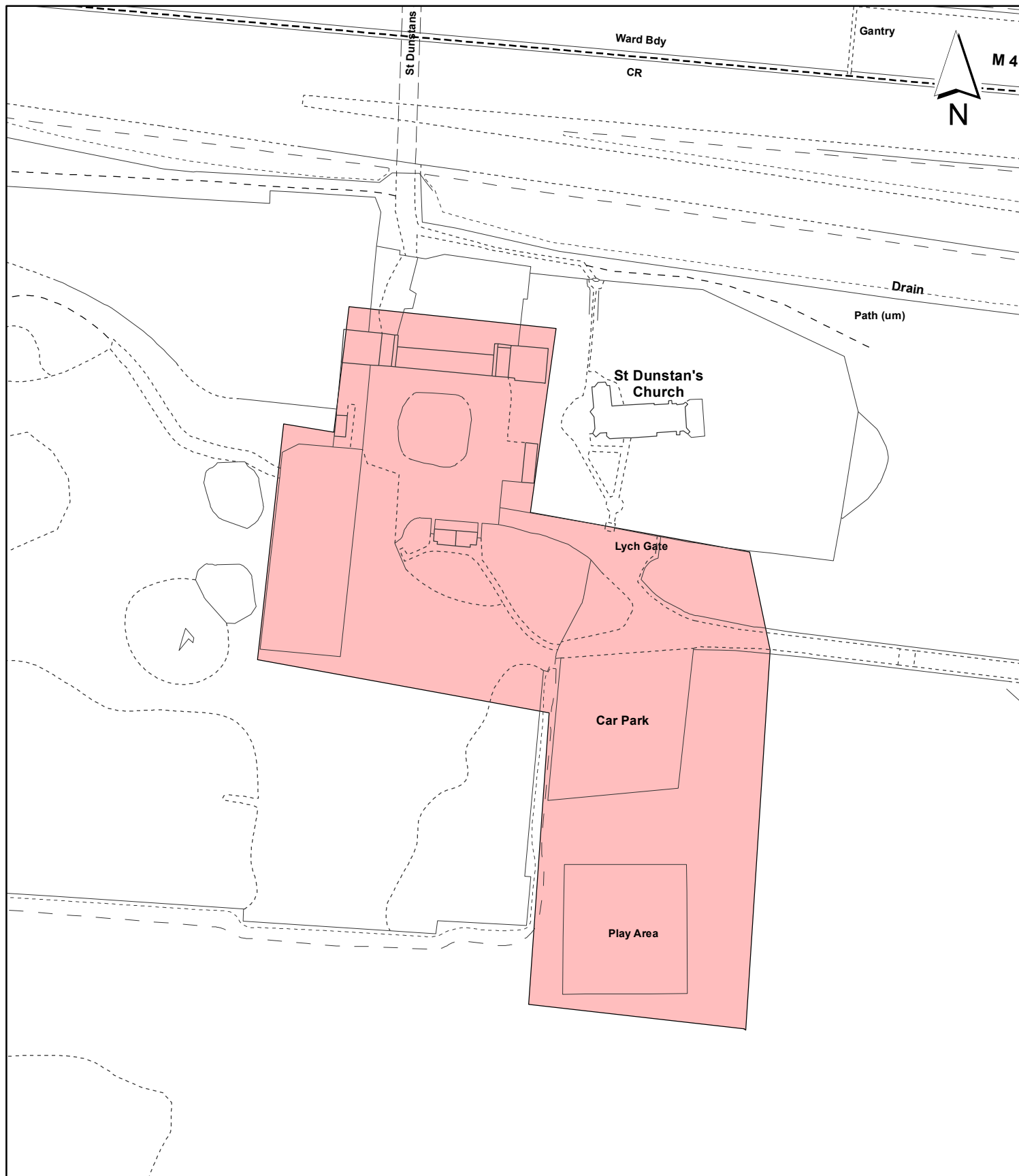
As such the proposed development is considered to accord with relevant policies and the application is recommended for approval, subject to relevant conditions.

## **11. Reference 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 - Consolidated With Alterations (2016)  
The National Planning Policy Framework (NPPF) (2019)

**Contact Officer:** Ed Laughton

**Telephone No:** 01895 250230



# Notes:

 Site boundary

For identification purposes only.

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Site Address:

**Cranford Park  
The Parkway  
Hayes**

Planning Application Ref:

**14009/APP/2019/4088**

Scale:

**1:1,250**

Planning Committee:

**Major Page 214**

Date:

**February 2020**

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

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## Report of the Head of Planning, Transportation and Regeneration

**Address** CRANFORD PARK THE PARKWAY HAYES

**Development:** The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works (application for listed building consent).

**LBH Ref Nos:** 14009/APP/2019/4090

**Drawing Nos:** 50027501-November 2019  
TH 2107 6th September 2019  
50027501-F-DAS-2019-12-13 Dec 2019  
535401 PL-401 Rev P3  
3050-56-SK1A  
3050-56-SK2A  
3050-56-SK3  
3050-56-SK4  
3050-56-SK5  
3050-56-SK6  
18910-01A  
18910-03A  
535401 EX-001 Rev P1  
535401 EX-010 Rev P1  
535401 EX-100 Rev P1  
535401 EX-101 Rev P1  
535401 EX-102 Rev P1  
535401 EX-200 Rev P1  
535401 EX-201 Rev P1  
535401 EX-202 Rev P1  
535401 EX-300 Rev P1  
535401 EX-400 Rev P1  
535401 EX-401 Rev P1  
535401 PL-102 Rev P3  
535401 PL-103 Rev P3  
535401 PL-106 Rev P3  
535401 PL-200 Rev P3  
535401 PL-201 Rev P3  
535401 PL-400 Rev P1  
535401 PL-101 Rev P5  
535401 REP-001 Rev P1  
535401 REP-100 Rev P1  
50027501-CBA-1-GF-DR-L-0110 Rev P2  
0027501-CBA-1-GF-DR-L-0001 Rev P1  
50027501-CBA-1-GF-DR-L-0010 Rev P2  
535401 PL-105 Rev P7  
18910-02 B

535401 PL-105 Rev P5  
535401 Cranford Park View 1  
535401 Cranford Park View 2  
535401 Cranford Park View 3  
535401 Cranford Park View 4  
535401 Cranford Park View 5  
535401 Cranford Park View 6  
535401 June 2019 Survey Report and Repair Schedule  
Cranford Park Planning Statement

**Date Plans Received:** 20/12/2019      **Date(s) of Amendment(s):** 20/12/2019  
**Date Application Valid:** 23/12/2019

## **1. CONSIDERATIONS**

### **1.1 Site and Locality**

Cranford Park is a countryside park of 58 hectares. It is bounded to the north-east by the A312 (The Parkway) and the south-east by Avenue Park. Residential and other urban development lie to the north and south of the Park. To the west there is agricultural land and areas used for gravel extraction. Heathrow Airport lies less than a kilometre to the south west.

The park is bisected by the M4 Motorway into a smaller area to the north and a larger area to the south connected by two subways. The main vehicular access into the park is from the A312. There are several pedestrian access points along the northern and southern boundaries. The River Crane flows along the east edge of the park and the Frog Ditch flows along its western boundary. The area north of the M4 features dense woodland and open meadow areas. The area to the south of the M4 features the historic core of the Park as well as extensive open grassland areas.

The application site is located within the core of the park where there are several historic buildings and structures such as the access bridge, the former stables, the retained cellars and St. Dunstan's Church and graveyard. At present the former stables and the retained cellars are on Historic England's Heritage at Risk Register. Within the site there are also further remnants of the former mansion, the access drive, pleasure grounds, ha-ha wall, orchard, kitchen garden and Cranford Wood. In addition there is a car park, a children's playground and a small, modern building that houses an information centre.

The application site is located within an area of Green Belt, a SINC (Metropolitan Site of Borough Grade II Importance) and lies within the Cranford Park Conservation Area.

### **1.2 Proposed Scheme**

The key objective of the works to the park are for the regeneration of the park overall with new facilities, to restore the high quality historical core of the park and enhance community use. The proposed works include the following elements:



#### New cafe pavilion and cellars

It is proposed to create a new cafe (Use Class A3) with associated commercial kitchen, toilets and amenity accommodation on the site of the now demolished Cranford House above the retained cellars. The concept for the new cafe building is based on the foundations of the old demolished mansion and the layout of ground floor rooms from the original mansion. Using this as a basis, the voids left by the mansions footprint would be extruded up, creating blocks in the landscape to illustrate the original footprint of the house and the layout of the rooms. Some of these extrusions will form the new cafe building itself and some will be picked out within the hard and soft landscaping. The new building will also provide access to the cellars, opening up the space to the public and restoring the listed structure. The proposal also includes a part change of use of the cellar for a small quantum of non-cafe related floorspace for museum/exhibition use (Use Class D1).

#### Stable block

Repair of the existing fabric of the building using traditional materials including repointing using lime mortar, replacement spalled bricks using salvaged bricks to match; new roofing slates and lead flashings. New internal works to include refurbishment of all areas providing flexible accommodation and enhancement of existing interaction room which demonstrates the previous stable use of the building plus historical information and artefact. First floors are proposed to be converted to office use (Use Class B1) possibly to be used by the Friends of Cranford Park group or potential commercial use. The stable block walls are proposed to be repaired using traditional materials including repointing in lime mortar.

#### Existing kiosk

It is proposed that the existing kiosk building would be reconfigured internally to provide three public accessible toilets (including one disabled accessible facility) and to provide a new refuse and recycling store attached to the norther facade.

#### Car Park

The existing car park has 39 spaces, including two blue badge spaces. It is proposed to extend and reconfigure the car park to create 10 additional car parking spaces with 4 blue badge spaces. The reconfiguration will create a layout that improves the space for vehicles to manoeuvre safely. Two new motorcycle spaces would also be created. It is proposed to create of 4 active electric vehicle charging points and 11 passive charging points where none currently exist. In addition 10 cycle stands would be provided, with 6 adjacent to St. Dunstan's Church and 4 next to the proposed cafe building.

#### Landscaping

Improved access and circulation around the park with restoration of historic landscape features is proposed. It is intended that this would create an improved sense of arrival and more closely match the historic landscaping scheme as originally laid out, including providing a visual link to the site of the former house and new cafe. As noted above reference to the original ground floor layout of Cranford House would be interpreted and new surface treatments more appropriate for the conservation area are proposed such as a bitumen-bonded gravel surface on the existing road and new flag paving.

The proposals are expected to result in the creation of 10 full time employment opportunities.

### 1.3 Relevant Planning History

14009/APP/2013/2032	Cranford Park Stables East & West Wing Cranford Lane Harlin
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Listed Building Consent for repairs and renovations to roof, flashing, cladding and interior.

**Decision Date:** 29-01-2015      **Approved**      **Appeal:**

14009/APP/2019/4088      Cranford Park The Parkway Hayes

The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works.

**Decision Date:**      **Appeal:**

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

This application is supported by a parallel planning application for the works proposed:  
14009/APP/2019/4088 - The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works - Undetermined

#### **2. Advertisement and Site Notice**

**2.1**      Advertisement Expiry Date:-      5th February 2020

**2.2**      Site Notice Expiry Date:-      22nd January 2020

**Contact Officer:** Ed Laughton

**Telephone No:** 01895 250230

### 3. **Comments on Public Consultations**

Consultation letters were sent to 32 local neighbouring owner/occupiers on the 27/12/19 and the application was advertised by way of site notices. One public consultation response has been received that can be summarised as:

- Excellent use of the wine cellar
- Will there be wheelchair access

Case Officer's response:

The Council's Access Officer has reviewed the proposed works under the parallel application for full planning consent (14009/APP/2019/4088) and has confirmed that the scheme is acceptable.

#### **HESTON RESIDENTS ASSOCIATION**

As Chairman of Heston Residents' Association this Planning Application has my full support.

#### **CRANFORD PARK FRIENDS GROUP Further response**

I am on the committee of the Cranford Park Friends group, and I am in favour of the plans to construct a new cafe and to make improvements to the stable block and cellars at the park. I would like to see the park used by as many people as possible. I believe the alterations would make the park more welcoming and interesting to a wider variety of people including young families, whilst not being detrimental to the surrounding natural environment of the park.

#### **HILLINGDON ARTS ASSOCIATION**

The Cranford Park is one of Hillingdon's 'hidden gems' in an area which is heavily urbanised and the Park, when enhanced will be of even greater value to the community than it is now. It has been a neglected green space for many years until more recently, but still lacks the amenities which are enjoyed in similar areas in the North of the borough. Because of its relative isolation it is essential that services such as toilets and parking are adequate for the visiting public and the provision of a cafe will have the potential to bring income to the project and therefore support further community developments on the site where there is great opportunity for drama, art, culture and historical heritage projects. As an Association we are pleased to support this application.

#### **HISTORIC ENGLAND**

No comments to make on the application.

#### **CONSERVATION AND DESIGN OFFICER**

Cranford Countryside Park is located to the north easterly location of Heathrow Airport close to Junction 3 of the M4 Motorway. The area is a highly valued green space in an urban location but is underutilised and in some areas is in a dilapidated condition. The M4 Motorway has divided the Park into two parts. The smaller northern portion has dense woodland and open meadow areas. Whereas in the larger southern portion can be found the historic core of the Park as well as extensive open grassland areas. This larger portion forms the Cranford Park Conservation Area. The two areas are connected via subways under the M4.

The application for listed building consent seeks consent to construct a detached cafe

building / seating area with the provision of new lift and stair access into the listed cellars beneath. The proposals also include minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of a bin store including all associated external works. The proposals form part of a wider refurbishment and regeneration strategy for the park overall to enhance community use.

In December 2017, Hillingdon Council was successful in its Round 1 Bid to the Heritage Lottery Fund (HLF) for major improvements to Cranford Park. These included: repair of the historic buildings and structures, re-use of the Stables and the Cellars, the building of a new cafe with toilet facilities, the restoration of the historic landscape and improvements to biodiversity. Also included were two play areas, a circular cycling/walking track, improved and new parking areas, improved signage, interpretation and safety measures and an Activity Plan which includes events for visitors and a programme of volunteer participation.

At the core of the Park there are several historic buildings and structures as well as remnants of the former mansion, the access drive, Pleasure Grounds, Ha-Ha wall, Orchard, Kitchen Garden and Cranford Wood. There is also a small, modern building that houses an information centre, a car park and a small children's playground.

The heritage assets include nine listed buildings, all Grade II, on and around Cranford House. These are: The Stables, the Cellars of Cranford House, the bridge over the River Crane, the Ha-Ha, St. Dunstan's Church (grade II\*), the five metre high Churchyard wall which adjoins the Stables, the walls to the north and south of the Stables on the western side and the long garden walls of the kitchen garden.

The park originally dates from the 1600s, however the main mansion and stable block was constructed in the 1700s. The house was demolished in 1945 but the red brick vaulted cellars (grade II) were, fortunately, left relatively intact. They are currently inaccessible to the public being accessed via a heavy metal trap door and cordoned off with intrusive security fencing for health safety concerns. Fortunately the cellars are in relatively good condition, although some areas of demolition rubble from the original house can be found within.

The stable block also remains in a relatively good condition despite a fire which resulted in some damage to the eastern portion internally. Some repairs have been undertaken in recent times to keep the building water tight until such a time that a future use for the building could be found.

The grade II listed cellars and stable block as well as the Cranford Park Conservation Area are included on Historic England's Heritage at Risk Register due to their deteriorating condition. A number of pre-application discussions have taken place prior to the submission of this application to discuss the proposed new cafe, repairs to the heritage assets and new uses for the vaulted cellars and stable block. The proposals are now considered acceptable in conservation terms subject to conditions.

The concept for the new cafe building is based on the foundations of the old demolished mansion and the layout of ground floor rooms from the original mansion. Using this as a basis, the voids left by the mansions footprint would be extruded up, creating blocks in the landscape to illustrate the original footprint of the house and the layout of the rooms. Some of these extrusions will form the new cafe building itself and some will be picked out within the hard and soft landscaping. This will help with the interpretation of the site and will create

an interesting feature within the landscape.

The cafe building is to a contemporary design that will sit quietly and complement the historic setting. The use of brick as a primary construction material along with Corten elements such as solar fins, solar shading canopy and plant enclosure would complement the colour and tones of the existing historic structures and would result in a building that would not compete with stable block and remaining curtilage walls. The detailed design of the building will need to be agreed along with material samples.

The cellars will be connected to the cafe building via steps and a lift which will be located in the same place as the original servant's steps. This will allow the vaults to have a number of flexible uses such as events, cinema, private hire and exhibitions. It is intended that the cellars will remain relatively unaltered except with some localised opening up works and upgrades for M&E lighting, ventilation, power and some glazed portholes for natural light.

The long eastern barrel vaulted passage way will be lit by a series of rooflight portholes. These will be installed without compromising the integrity of the brick barrel vaulted structure with the use of a core drill. The portholes will help to naturally light a timeline within the corridor detailing Cranford Park's history. The detailed design of the bespoke portholes will need to be agreed by condition so that they are discreet additions that respect their historic setting and appearance of the barrel vaulted passageway.

The other internal works will see the creation of a plant room which will be retained within three of the vaulted bays. The detailed design of this enclosure and the M&E runs will need to be agreed by condition as there is currently insufficient information submitted with the application.

The other intervention would be the removal of some of the brickwork between the piers that divide the eastern passage with the main vaulted rooms. This will allow for easier and inclusive access so that the vaulted space and any future events can be enjoyed by all. The extent of brick work and the method for its removal will need to be agreed by condition.

The existing 'trap door' entrance into the cellar at the north end of the cellar will be converted to an escape stair. This will be enclosed in Corten cladding that should sit discretely at the southern end of the walled garden.

The existing stable block would remain as its current configuration with some alterations and refurbishments for craft workshops, interpretation and museum as well as a commercial use to the first floor. These works will generally be of a light touch that will primarily see the building sympathetically repaired to bring it back into use helping to secure its future for the long term.

The submitted Survey Report and Repair Schedule details the repair of the other listed structures found within the park. It acknowledges that the garden walls are generally in good condition although some areas are covered by vegetation including ivy. The ha-ha is in reasonable condition although some areas have collapsed or in need of rebuilding. The bridge over the River Crane is in good condition and no repairs are proposed.

The proposed new cafe with access to the vaults to create a flexible space along with the repair of the stable block, new landscaping and the creation of the visitor centre as well as the repair of the other listed structures will be a positive enhancement to Cranford Park. The proposals would be of benefit to both local people and visitors to the area and help to

safeguard the heritage assets for the long term.

Another positive benefit of the proposals would be that once the works are complete the structures and conservation area would be removed from Historic England's Heritage at Risk Register.

Suggested conditions:

1. Submission of Details

Detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority before the relevant part of the works is begun, and the works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:

- (a) Samples of materials
- (b) Details of the cafe roof parapet, solar fins and canopy
- (c) Detailed design proposals for portholes to the cellar passage
- (d) Detailed repairs specification for the vaulted cellars
- (e) Details and method statement for the retention of the north end original steps with the construction of new enclosed escape stair.
- (f) Details of plant room to vaulted cellar and service runs.
- (g) Details of extent of brickwork removal between piers of the eastern passage and the cellar vaults along with a method statement

Reason

To safeguard the special architectural and/or historic interest of the building

2. Sample panels required

Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel(s) so approved.

Reason

To safeguard the special architectural and/or historic interest of the building

3. Sample of re-pointing and mortar specification

A specification of the mortar to be used in the repair of the heritage assets shall be submitted to and approved in writing by the local planning authority. Samples of repointing for the localised repair of the cellar vaults, stable block and curtilage walls and ha-ha shall also be provided on site, and approved in writing by the local planning authority before the relevant part of the works are commenced. The works shall be undertaken in accordance with the approved mortar specification and samples on site.

Reason

To safeguard the special architectural and/or historic interest of the building

4. Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors of the cafe and visitors centre shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

Reason

To safeguard the special architectural and/or historic interest of the building

5. Retention of fabric

All existing fabric shall be retained unless noted otherwise on the drawings approved under this consent.

Reason

To safeguard the special architectural and/or historic interest of the building

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

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.HE1 (2012) Heritage

Part 2 Policies:

DMHB 1 Heritage Assets

DMHB 2 Listed Buildings

DMHB 4 Conservation Areas

DMHB 11 Design of New Development

LPP 7.8 (2016) Heritage assets and archaeology

NPPF- 16 NPPF-16 2018 - Conserving & enhancing the historic environment

#### 5. **MAIN PLANNING ISSUES**

The main planning issues relate to the impact the proposed works would have on the character, appearance and setting of the Grade II Listed Buildings.

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 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.

Policy DMHB 2 states that applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutory Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on the significance. The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required. Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

The application site has a number of Listed Buildings located on the site. These include the access bridge, the former stables, the retained cellars and St. Dunstan's Church and graveyard. There are also further remnants of the former mansion, the access drive, pleasure grounds, ha-ha wall, orchard and kitchen garden in the immediate locality.

The proposed new cafe with access to the vaults to create a flexible space along with the repair of the stable block, new landscaping and the creation of the visitor centre as well as the repair of the other listed structures will be a positive enhancement to Cranford Park. The proposals would be of benefit to both local people and visitors to the area and help to safeguard the heritage assets for the long term.

A significant positive benefit of the proposals would be that once the works are complete the statutory Listed structures within the Conservation Area that are currently on the Historic England's Heritage at Risk Register would be removed from this list.

Historic England (GLAAS) and the Council's Conservation and Design Officer have reviewed the proposals and provided comments in support of the application. Subject to conditions they raise no objection to the proposals.

As such it is considered the proposed development accords with Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January



2020).

The application for Listed Building Consent is therefore recommended for approval.

## **6. RECOMMENDATION**

### **APPROVAL subject to the following:**

#### **1 LB1 Time Limit (3 years) - Listed Building Consent**

The works hereby permitted shall be begun before the expiration of three years from the date of this consent.

#### **REASON**

To comply with Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

#### **2 COM4 Accordance with Approved Plans**

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

50027501-CBA-1-GF-DR-L-0001 Rev P1

18910-01 A

18910-03 A

3050-56-SK1A

3050-56-SK2A

3050-56-SK3

3050-56-SK4

3050-56-SK5

3050-56-SK6

535401 PL-102 Rev P3

535401 PL-103 Rev P3

535401 PL-106 Rev P3

535401 PL-200 Rev P3

535401 PL-201 Rev P3

535401 PL-400 Rev P1

535401 PL-401 Rev P3

535401 REP-001 Rev P1

535401 REP-100 Rev P1

535401 PL-101 Rev P5

535401 PL-105 Rev P5

18910-02 B

50027501-CBA-1-GF-DR-L-0110 Rev P2

535401 PL-105 Rev P7; and shall thereafter be retained/maintained for as long as the development remains in existence.

#### **REASON**

To ensure that the development complies with the objectives of Policies within the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

The development hereby permitted shall not be occupied until the following has been

completed in accordance with the specified supporting plans and/or documents:  
Design and Access Statement 50027501-F-DAS-2019-12-13 Dec 2019  
Planning Statement Cranford Park  
Scope of Services/Utilities 3050-1 Rev A 12th November 2019  
Survey Report and Repair Schedule 535401 June 2019  
Tree Survey Report for Cranford Park TH 2107 6th September 2019  
Historical Statement 50027501-November 2019

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

#### REASON

To ensure that the development complies with the objectives of Policies within the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### 4 NONSC Further Details

No development shall take place until the following details have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include information relating to:

- (a) Samples of materials
- (b) Details of the cafe roof parapet, solar fins and canopy
- (c) Detailed design proposals for portholes to the cellar passage
- (d) Detailed repairs specification for the vaulted cellars
- (e) Details and method statement for the retention of the north end original steps with the construction of new enclosed escape stair.
- (f) Details of plant room to vaulted cellar and service runs.
- (g) Details of extent of brickwork removal between piers of the eastern passage and the cellar vaults along with a method statement

#### REASON

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1, DMHB 2 and DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### 5 NONSC Re-pointing and Mortar Specification

A specification of the mortar to be used in the repair of the heritage assets shall be submitted to and approved in writing by the local planning authority. Samples of repointing for the localised repair of the cellar vaults, stable block and curtilage walls and ha-ha shall also be provided on site, and approved in writing by the local planning authority before the relevant part of the works are commenced. The works shall be undertaken in accordance with the approved mortar specification and samples on site.

#### REASON

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### 6 NONSC Retention of Fabric

All existing fabric shall be retained unless noted otherwise on the drawings approved under this consent.

## REASON

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### 7 NONSC Archaeology - Written Scheme of Investigation

No demolition or development shall take place until a Written Scheme of Investigation (WSI) has been submitted to and approved in writing by the local planning authority. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance, research objectives and;

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI. The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

## REASON

Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### 8 NONSC Archaeology - Foundation Design and Construction Method

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

## REASON

Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure physical preservation of the site's archaeological interest, in accordance Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## INFORMATIVES

- 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 The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) 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.

DMHB 1 Heritage Assets

DMHB 2 Listed Buildings

DMHB 4 Conservation Areas

DMHB 1 Design of New Development

LPP 7.8 (2016) Heritage assets and archaeology

NPPF- 1 NPPF-16 2018 - Conserving & enhancing the historic environment

- 3** The Written Scheme of Investigation (WSI) will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

The WSI condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

The WSI pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. Without this pre-commencement condition being imposed the application would not comply with NPPF paragraph 199. The archaeological work should include:

#### Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

The GLAAS support the idea of a professional organised community archaeology project rather the purely professional investigations usually seen on commercial development sites.

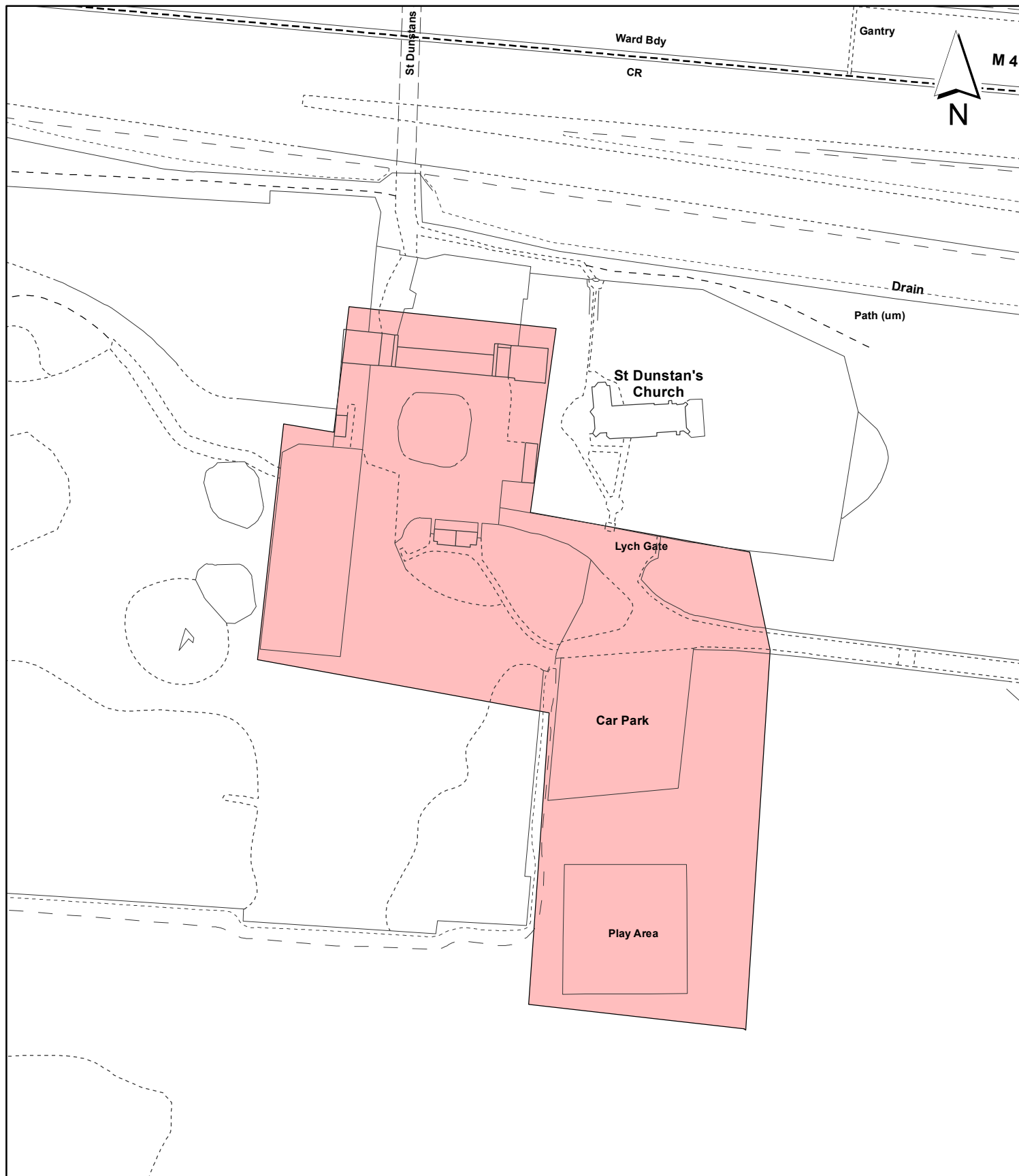
#### Historic Building Recording

Archaeological building recording is an investigation to establish the character, history, dating, form and development of a an historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published. This would be analytical recording of the cellar structure to complement the above ground archaeological investigation.

#### Watching Brief

A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will

be a report and archive. The watching brief would cover the minor groundworks away from the house and cellars.



# Notes:

 Site boundary

For identification purposes only.

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Site Address:

**Cranford Park  
The Parkway  
Hayes**

Planning Application Ref:

**14009/APP/2019/4090**

Planning Committee:

**Major Page 230**

Scale:

**1:1,250**

Date:

**February 2020**

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

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## Report of the Head of Planning, Transportation and Regeneration

**Address:** Bridge House, Riverview House and Waterside House, Oxford Road

**Development:** Section 73 application to vary the approved plans list condition of application reference 40050/APP/2017/2438 dated 01/09/2017 for (Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to residential units (Class C3) together with ancillary car parking, cycle storage and waste and recycling storage (as amended by application reference 40050/APP/2019/3869 dated 21/01/20).

The amendments to the approved plans propose: No longer including the 6th floor of Bridge House (6 x 1 bedroom units and 1 x Studio) and allow the change in the mix of units at Bridge House from 9 x Studios and 114 x 1 bedroom units to 16 x studios, 43 x 1 bedroom units and 56 x 2 bedroom units.

**LBH Ref Nos:** 40050/APP/2019/1865

**Drawing Nos:** A\_SK\_190816\_01 Rev 01  
568-PTA-ZZ-ZZ-DR-A-1001 Rev. P04  
68-PTA-ZZ-XX-DR-A-0001 Rev P03  
Covering Letter

**Date Plans Received:** 04/06/2019

**Date Application Valid:** 23/01/2020

### 1. SUMMARY

This application was previously presented to Major Applications Planning Committee on 17 July 2019. The Committee resolved to approve the application, subject to a S106 Agreement.

In the period of time between the Major Applications Planning Committee determining to approve the application and the completion of the associated legal agreement there has been a Court of Appeal ruling which has a bearing on the application. The '*Finney vs Welsh Ministers*' Court of Appeal ruling determined that making a change to a description of development would be outside of the powers of Section 73 of the Town and Country Planning Act (1990), without first making the change to the description via an alternative planning application known as a s96A non-material amendment. Whilst these are procedural matters, they have resulted in the need to reassess the proposals to ensure that any decision notice issued is valid and that the Council's decision was sound.

Subsequently a Section 96A application (40050/APP/2019/3869) was submitted to restructure the original consent to remove reference to the unit numbers and proposed housing mix from the description of development and instead control them through an amended condition wording. The Section 96A application was approved on 21 January 2020. Therefore the current application no longer requires a change to be made to the description of development and can be determined within the powers of Section 73 of the Town and Country Planning Act (1990).

The application is in all other ways as previously proposed and resolved for approval by planning committee. The application seeks alterations to the internal layout of the consented Prior Approval scheme under planning ref: 40050/APP/2017/2438 approved 01 September 2017.

The proposal seeks to alter the plans condition, which following the s96A application now includes the unit mix, so that it reflects the new proposed unit mix. It is proposed to remove the sixth floor (1 x studio and 6 x one bed units) from Bridge House and to change the approved scheme to 22 x studios, 149 x 1 beds and 58 x 2 beds.

As previously approved, a total of 359 off street car parking spaces, including 37 disabled bays, would be provided to serve future occupants. The spaces will be located within the existing multi-storey car park and hard surfaced parking areas which serve the existing office use. 17 Motorcycle parking spaces are proposed and facilities for the secure storage of 305 cycles will be provided within the buildings for the occupiers of the residential units being considered within this application (185 cycle spaces within Bridge House and 60 in each of Waterside House and Riverview House). This represents an increase of 66 cycle spaces compared to the original Prior Approval scheme ref. 40050/APP/2017/2438.

The proposal is considered under Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended which allows for such development subject to a determination by the Local Planning Authority as to whether Prior Approval will be required. The application is not seeking a variation to a full planning permission and Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (England) Order 2016 only permits the Local Planning Authority to take the following factors into consideration in the determination of such an application:

- (a) transport and highways impacts of the development;
- (b) contamination risks on site;
- (c) flooding risks on site; and
- (d) impacts of noise from commercial premises on the intended occupiers of the development.

In considering an application for prior approval under Class O, Paragraph 10b of Section W states that the local planning authority shall "have regard to the National Planning Policy Framework... so far as relevant to the subject matter of the prior approval, as if the application were a planning application". As such, the alterations under this application can only be assessed against transport and highways impact, contamination, noise and flood risk. The local planning authority is not directed, as a matter of law, to determine applications for prior approval under Class O with reference to the Development Plan.

The local planning authority may also grant prior approval unconditionally or subject to conditions reasonably related to the subject matter of the prior approval.

The application has been assessed against the above criteria and subject to relevant conditions and the securing of obligations through a Deed of Variation to the Section 106 Legal Agreement, prior approval is not required.

## **2. RECOMMENDATION**



**1. That delegated powers be given to the Head of Planning, Regeneration and Transportation, to approve this application subject to:**

**A) Entering into a variation to the original Section 106 Agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or S278 of the Highways Act 1980 (as amended) and/or other appropriate legislation to secure:**

**1. Contribution towards improvements to the local highway network with an upper limit of £538,543.90, plus a transport appraisal to include modelling of the local network prior to commencement of the development.**

**2. Public Realm Contribution of £376,980.72**

**3. Parking Permit free development for all future residents of this site**

**B) That the applicant meets the Council's reasonable costs in preparation of the variation to the Section 106 and/or 278 Agreements and any abortive work as a result of the agreement not being completed.**

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

**D) If the Legal Agreements have not been finalised by 19 August 2020 (or such other timeframe as may be agreed by the Head of Planning, Regeneration and Transportation), delegated authority be given to the Head of Planning, Regeneration and Transportation to refuse the application for the following reason:**

**'The applicant has failed to provide measures to mitigate the impacts of the development through enhancements to the environment necessary as a consequence of demands created by the proposed development (relating to highway works (including Transport Assessment) and public realm improvement contribution). The proposal therefore conflicts with the Town and Country Planning (General Permitted Development) (England) Order 2015, policies DMCI 7, DMT 2 and DMT 5 of the Hillingdon Local Plan: Part Two Development Management Policies (January 2020), the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), the London Plan (March 2016) and the NPPF.'**

**E) That subject to the above, the application be deferred for determination by the Head of Planning, Regeneration and Transportation under delegated powers, subject to the variation to the original Section 106 Agreement under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the applicant.**

**F) That if the application is approved, the following conditions be imposed subject to changes negotiated by the Head of Planning, Regeneration and Transportation prior to issuing the decision.**

**1. Accordance with Approved Plans**

The application hereby approved shall be for the creation of 230 residential units comprising 22 x studios, 149 x 1 beds and 58 x 2 beds with 359 off street car parking spaces, including 37 disabled parking spaces, as set out in the plans hereby approved:

568-PTA-ZZ-00-DR-A-1000 Rev P02

568-PTA-ZZ-XX-DR-A-0001 Rev P03

568-PTA-ZZ-ZZ-DR-A-1001 Rev. P04

6444/UX P04 E

6444/UX P05 C

6444/UX P06 B

6444/UX P07 D

6444/UX P08 B

6444/UX P09 B; and shall thereafter be retained/maintained for as long as the development remains in existence.

#### REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two Development Management Policies (January 2020) and the London Plan (2016).

## 2. Contaminated Land

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

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

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

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

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

#### Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan:

### **3. Sound Installation**

Development shall not begin until a sound insulation and ventilation scheme for protecting the proposed development from noise generated by commercial premises has been submitted to and approved in writing by the Local Planning Authority. The scheme shall meet an acceptable internal noise design criteria against external noise as agreed with the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

#### **REASON**

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by noise generated by commercial premises in accordance with policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

### **4. Construction Management Plan**

Prior to development commencing, the applicant shall submit a demolition and construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

#### **REASON**

To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part Two - Development Management Policies (January 2020).

### **5. Parking Allocation**

The residential units hereby approved shall not be occupied until a parking allocation scheme has been submitted to, and approved in writing by, the Local Planning Authority. The parking allocation scheme shall, as a minimum, include a requirement that all on-site car parking shall be allocated and dedicated for the use of each of the residential units hereby approved and shall remain allocated and dedicated in such a manner for the life-time of the development.

#### **REASON**

To ensure that an appropriate level of car parking provision is provided on site in accordance with Policy DMT 6 of the Hillingdon Local Plan Part Two - Development Management Policies (January 2020).

## **INFORMATIVES**

### **1. 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).

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

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

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

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) 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.

### **4. 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 the Local Plan Parts 1 and 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.

## **3. CONSIDERATIONS**

### **3.1 Site and Locality**

The site fronts onto Oxford Road (A4020) and is an island site between the River Colne and the Grand Union Canal. The River Colne is the border between Hillingdon and South

Buckinghamshire, which also denotes the administrative boundary of the Greater London Area.

The island site is currently occupied by 3 buildings: Bridge House, Waterside and Riverview all of which have direct access from Oxford Road. The existing Bridge House building to the north of the site is in a prominent position on Oxford Road, considered to be a 'gateway' site into Uxbridge. The building is 6 storeys in height plus an additional storey of plant and provides office use plus a small existing ancillary cafe on the ground floor. To the south of Bridge House is a multi storey car park providing 246 car parking spaces, plus 30 surface car parking spaces (including 5 disabled spaces), which also sits within the boundary of the current application. Bridge House was constructed in 1967 and was re-clad in 1998. Waterside House and Riverview House are both 3 storey office buildings and are located to the south of the site adjacent to the River Colne.

The surrounding area is mixed use and contains a number of existing multi storey office buildings. The closest residential properties are located within Denham Lodge, to the north west of the site on the opposite side of Oxford Road. To the north of the site is the Swan and Bottle Public House, which is locally listed.

The site is within, but on the north western boundary of, Uxbridge Town centre and is within an Archaeological Priority Area. The majority of the site has a PTAL rating of 2, however the north eastern corner has a PTAL rating of 3. The site is within a developed area, as designated by the Hillingdon Local Plan (November 2012).

The land on the western bank of the River Colne is within South Buckinghamshire and is designated as Green Belt and a Biodiversity Opportunity Area. There is also Uxbridge Lock Conservation Area to the north of the site.

### **3.2 Proposed Scheme**

Under Prior Approval application reference 40050/APP/2017/2438 consent was granted for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to 237 residential units from 15 x studios, 220 x 1 beds and 2 x 2 bed units, together with ancillary car parking, cycle storage and waste and recycling storage.

Under a Section 96A application ref: 40050/APP/2019/1575 a non material amendment to the application was approved to include the approved list of plans within a condition.

Under a further Section 96A application ref. 40050/APP/2019/3869 a restructure to the consent to remove reference to the unit numbers and proposed housing mix from the description of development and instead control them through an amended wording of the plans condition was approved. Therefore the current application no longer requires a change to be made to the description of development and can be determined within the powers of Section 73 of the Town and Country Planning Act (1990).

The application seeks alterations to the internal layout of the consented Prior Approval under planning ref: 40050/APP/2017/2438 to remove the sixth floor (1 x studio and 6 x one bed units) from Bridge House and to reconfigure the approved internal layout of Bridge House to provide 36 additional habitable rooms. This would be achieved through the introduction of a greater number of 2 bedroom units. No changes are proposed to Riverview House or Waterside House.

To achieve the proposed amendment the application seeks to alter the approved plans condition, which following the above noted s96A application now also includes the unit mix, so that it reflects the new proposed unit mix. It is proposed to change the approved scheme to 22 x studios, 149 x 1 beds and 58 x 2 beds. Across the three buildings this would be:

	Bridge House	Riverview House	Waterside House	Total
Studios	16	3	3	22
1 bedroom units	43	53	53	149
2 bedroom units	56	1	1	58
				229

As previously approved, a total of 359 off street car parking spaces, including 37 disabled bays, would be provided to serve future occupants. The spaces will be located within the existing multi-storey car park and hard surfaced parking areas which served the office use. 17 Motorcycle parking spaces are proposed and facilities for the secure storage of 305 cycles will be provided within the buildings (185 cycle spaces within Bridge House and 60 in each of Waterside House and Riverview House).

### 3.3 Relevant Planning History

40050/APP/2016/852 Bridge House, Denbridge Ind. Estate Oxford Road Uxbridge

Demolition of existing office building (Use Class B1(a) and multi-storey car park and redevelopment of the site to provide a new office (Use Class B1(a) building, associated multistorey car park and ancillary cafe unit (Use Class A1/A3).

**Decision:** 05-01-2017 Approved

40050/APP/2017/2438 Bridge House, Riverview House & Waterside House Oxford Road

Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to 237 residential units (15 x Studio and 224 x 1-Bed) together with ancillary car parking, cycle storage and waste and recycling storage.

**Decision:** 23-08-2017 Approved

40050/APP/2017/3356 Waterside Oxford Road Uxbridge

Prior Approval application for the change of use of Waterside from office accommodation (Class B1) to 35 residential units (Class C3) together with ancillary car parking, cycle storage and recycling storage.

**Decision:** 27-10-2017 Approved

40050/APP/2017/3357 Riverview Oxford Road Uxbridge

Prior Approval application for the change of use of Riverview from office accommodation (Class B1) to 37 residential units (Class C3) together with ancillary car parking, cycle storage and recycling storage.

**Decision:** 25-10-2017 Approved

40050/APP/2017/3358 Bridge House Oxford Road Uxbridge

Prior Approval application for the change of use of Bridge House from office accommodation (Class B1) to 76 residential units (Class C3) together with ancillary car parking, cycle storage and recycling storage.

**Decision:** 27-10-2017 Approved

40050/APP/2018/1736 Bridge House Oxford Road Uxbridge

Installation of new windows, doors and alterations to balconies

**Decision:** 20-07-2018 Approved

40050/APP/2019/1575 Bridge House Oxford Road Uxbridge

Non-material amendment to planning application reference 40050/APP/2017/2438 (Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to 237 residential units (15 x Studio and 224 x 1-Bed) together with ancillary car parking, cycle storage and waste and recycling storage) to add a condition listing approved plan numbers.

**Decision:** 25-09-2019 Approved

40050/APP/2018/1737 Bridge House Oxford Road Uxbridge

Demolition of existing rooftop plant room and replacement with two storey extension to provide 25 new residential units (Use Class C3), ancillary gymnasium (Use Class D2) plus associated landscaping and parking (AMENDED APRIL 2019).

**Decision:** Determination to Approve subject to s106 Agreement

40050/APP/2019/3869 Bridge House Oxford Road Uxbridge

Non-material amendment to planning application reference 40050/APP/2017/2438 (Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to 237 residential units (15 x Studio and 224 x 1-Bed) together with ancillary car parking, cycle storage and waste and recycling storage) to change the description of development and add an additional condition.

**Decision:** 21-01-2020 Approved

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

This application was previously presented to Major Applications Planning Committee on 17 July 2019 and with revised Heads of Terms on 21 August 2019. The Committee resolved to approve the application, subject to an amended S106 Agreement.

In the period of time between the Major Applications Planning Committee determining to approve the application and the completion of the S106 Agreement there was a Court of Appeal ruling which has a bearing on the application. The *'Finney vs Welsh Ministers'* Court of Appeal ruling determined that making a change to a description of development would be outside of the powers of Section 73 of the Town and Country Planning Act (1990).

Subsequently a Section 96A application (40050/APP/2019/3869) was submitted to restructure the original consent to remove reference to the unit numbers and proposed housing mix from the description of development and instead control them through an amended condition wording. This application was approved on 21 January 2020.

The amended description of the development of the original consent is 'Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to residential units (Class C3) together with ancillary car parking, cycle storage and waste and recycling storage' as amended by application reference 40050/APP/2019/3869 dated 21/01/20.

Therefore the current application no longer requires a change to be made to the description of development and can be determined within the powers of Section 73 of the Town and Country Planning Act (1990).

#### **4. PLANNING POLICIES AND STANDARDS**

Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

#### **LDF Designation and London Plan**

The following Policies are considered relevant to the application:-

Part 2 Local Plan Policies

DMCI 7: Planning Obligations and Community Infrastructure Levy

DMHB 11: Design of New Development

DMT 2: Highways Impacts

DMT 5: Pedestrians and Cyclists

DMT 6: Vehicle Parking

DMEI 9: Management of Flood Risk

DMEI 11: Protection of Ground Water Resources and

DMEI 12: Development of Land Affected by Contamination

NPPF National Planning Policy Framework

#### **5. ADVERTISEMENT AND SITE NOTICE**

Site Notice Expiry Date: 18-02-2020

#### **6. CONSULTATIONS**

##### **6.1 EXTERNAL CONSULTEES**

The consultation period will expire on the 14<sup>th</sup> February 2020. No responses have been received to date. Should any responses be received they will be confirmed within the Committee Addendum.

##### **6.2 INTERNAL CONSULTEES**

#### **ENVIRONMENTAL PROTECTION UNIT: NOISE**

The amended layout has been reviewed and I have no objections subject to the following condition:

Development shall not begin until a sound insulation and ventilation scheme for protecting the future occupants of the development from noise generated by commercial premises has been submitted to and approved in writing by the Local Planning Authority. The scheme shall meet an acceptable internal noise design criteria against external noise as agreed with the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

#### **REASON**

To ensure that the amenity of the occupiers of the proposed development is not adversely



affected by noise generated by commercial premises in accordance with policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

Officer comment: The recommended condition has been included within the decision.

## **HIGHWAYS**

This 'island' site is situated within a business catchment area and is directly accessed off Oxford Road in Uxbridge which is designated as 'Classified' in the borough's hierarchy of roads. It is in the far western end of the borough in proximity to the borough boundary with South Buckinghamshire District Authority.

The site is uniquely situated as it flanked by the Grand Union Canal and the River Colne resulting in a waterfront vista onto the former. The site exhibits a PTAL average rating of 2/3 which is considered as average which heightens dependency on the use of private motor transport. Vehicular access is taken from Oxford Road and is to remain unaltered.

There had been an application and subsequent approval for a Prior Approval (PA) - 40050/APP/2017/2438 for the island site which consisted of Bridge House, Waterside House and Riverview House and was related to a change of use from class B1 to 237 residential units in total with 359 car parking spaces. This represents a car parking to residential unit ratio of 1.5 123 units would be located within Bridge House which would have 185 car parking spaces; again this represents a ratio of car parking spaces to residential units of 1.5. This is being progressed and this current application consists of converting a number of one-bed flats to studio, one bedroom and two bedroom flats, creating 36 additional habitable rooms. The overall number of flats would be reduced to 229.

### **Parking/Cycle Provision**

Policy DMT 6 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) states that new development will only be permitted where it is in accordance with the Council's adopted parking standards.

For the proposed minor amendment to create a revised total of 36 habitable rooms there would not be a requirement to provide additional car parking spaces. This should remain at 185 spaces for Bridge House. Similarly there is no requirement to provide additional secure and accessible cycle parking spaces as the number proposed in the PA accords with the Council's parking standards. This has been indicated.

### **Vehicular Trip Generation/ Access Arrangements**

Policy DMT 2 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) requires the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Arising from this Minor Amendment would be an increase in person trips. Such uplift is considered relatively absorbable in generation terms and therefore can be accommodated within the local transport network without notable detriment to traffic congestion and road safety. As a consequence the existing vehicular access on Oxford Road is considered 'fit for purpose' and does not require alteration.

### **Public Realm Impacts/Highway Interventions**

It is noted that significant public realm betterment has already been achieved at the PA consent stage which incorporated the findings within the submitted Pedestrian and Cycling environment audits (PERS and CERS). Given that this planning application creates an additional 36 habitable rooms a revised contribution of £376,980.72 is sought for investment

in public realm enhancements works and a further £538,543.90 for investment in highway works.

#### Operational Servicing /Refuse Requirements

Servicing and refuse collection would be undertaken as per the consented 2017 PA for the whole site operation. There are no further observations.

#### Construction Logistics Plan (CLP)

A full and detailed CLP will be a requirement given the constraints and sensitivities of the local road network in order to avoid/minimise potential detriment to the public realm. It will need to be secured under planning condition.

#### Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any highway safety concerns, in accordance with policies DMT 2 and DMT 6 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) and policies 6.3, 6.9, and 6.13 of the London Plan (2016). There are no highway, traffic or transportation objections to this planning application

#### Case Officer's comment:

The contributions would be secured through a Deed of Variation to the original consent.

#### **ENVIRONMENTAL PROTECTION UNIT: LAND CONTAMINATION**

The submitted documents indicate the site has an extensive history of contaminative uses, and there is evidence that the land may be affected by contamination.

A phase 2 investigation should therefore be undertaken to determine the actual conditions of land at the site.

Therefore, it is recommended that the following condition is applied:

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

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

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

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

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

#### Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020); Policies - DME1 11: Protection of Ground Water Resources and DME1 12: Development of Land Affected by Contamination.

#### Case Officer's comment:

The proposed condition is recommended to be attached to any approval of the application.

### **FLOOD AND WATER MANAGEMENT**

No comment.

## **7. MAIN PLANNING ISSUES**

### **7.01 THE PRINCIPLE OF THE DEVELOPMENT**

Prior Approval was given under planning ref: 40050/APP/2017/2438 to create 237 residential units. It is possible to vary prior approval permissions through a Section 73 application. The Council nonetheless would still be obliged to consider such an application in the context of prior approval criteria.

The number and mix of units is proposed to be amended as the proposal seeks alterations to the internal layout of the building. Given that Prior Approval has already been given for the buildings and the alterations would not result in an increase to the number of units, there are no objections to the principle of the proposals so long as the relevant criteria impacts are acceptable.

### **7.02 DENSITY OF THE PROPOSED DEVELOPMENT**

Not applicable as this is not an application for planning permission.

### **7.03 IMPACT ON ARCHAEOLOGY/CA/LISTED BUILDINGS**

Not applicable as this is not an application for planning permission.

### **7.04 AIRPORT SAFEGUARDING**

Not applicable as this is not an application for planning permission.

#### **7.05 IMPACT ON THE GREEN BELT**

Not applicable as this is not an application for planning permission.

#### **7.06 ENVIRONMENTAL IMPACT**

Not applicable as this is not an application for planning permission.

#### **7.07 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA**

Not applicable as this is not an application for planning permission.

#### **7.08 IMPACT ON NEIGHBOURS**

Not applicable as this is not an application for planning permission.

#### **7.09 LIVING CONDITIONS FOR FUTURE OCCUPIERS**

Not applicable as this is not an application for planning permission.

#### **7.10 TRAFFIC IMPACT, CAR/CYCLE PARKING, PEDESTRIAN SAFETY**

The Council's Highways Engineer has carefully reviewed the proposals and provided detailed comments on the measures required to mitigate against the impact of the development. A Transport Assessment is required and a highways contribution of up to £538,543.90, plus a Public Realm contribution of £376,980.72. The Applicant has agreed to these obligations which would be secured through a deed of variation to the S106 Legal Agreement.

It is worth noting that the existing legal agreement requires that a Parking Strategy be submitted for ceasing usage of all additional car parking on site over and above the 359 proposed off street car parking spaces for the development.

Subject to the completion of the Deed of Variation to the Legal Agreement the Highway's impact of the development is acceptable.

#### **7.11 URBAN DESIGN, ACCESS AND SECURITY**

Not applicable as this is not an application for planning permission.

#### **7.12 ACCESS FOR PEOPLE WITH A DISABILITY**

Not applicable as this is not an application for planning permission.

#### **7.13 PROVISION OF AFFORDABLE & SPECIAL NEEDS HOUSING**

Not applicable as this is not an application for planning permission.

#### **7.14 TREES, LANDSCAPING AND ECOLOGY**

Not applicable as this is not an application for planning permission.

#### **7.15 SUSTAINABLE WASTE MANAGEMENT**

Not applicable as this is not an application for planning permission.

#### **7.16 RENEWABLE ENERGY/SUSTAINABILITY**

Not applicable as this is not an application for planning permission.

#### **7.17 FLOODING ISSUES**

The Flood and Water Management Officer has raised no objections to the proposal nor requested any conditions be imposed should the application be approved.

#### **7.18 NOISE AND AIR QUALITY**

Noise from Commercial Premises

The Council's Environmental Protection Unit has reviewed the proposal in terms of the potential detrimental impact from noise generated externally from the site. As set out in Section 6 of this report, subject to a condition requiring details of how future occupiers will be protected from noise generated by adjacent commercial premises no objections have been raised. The proposal is therefore acceptable in terms of noise.

#### Air Quality

Not applicable as this is not an application for planning permission.

### **7.19 COMMENTS ON PUBLIC CONSULTATION**

None received.

### **7.20 PLANNING OBLIGATIONS**

In order to mitigate against the impact of the proposals, the following obligations will be sought:

1. Contribution towards improvements to the local highway network with an upper limit of £538,543.90, plus a transport appraisal to include modelling of the local network prior to commencement of the development.
2. Public Realm Contribution of £376,980.72
3. Parking Permit free development for all future residents

### **7.21 EXPEDIENCY OF ENFORCEMENT ACTION**

Not applicable

### **7.22 OTHER ISSUES**

#### Contaminated Land

The Council's Contaminated Land Officer has reviewed the submitted documents in terms of the risk of contamination and has raised no objections to the proposal subject to the attachment of an appropriate condition. The proposal is therefore acceptable in terms of contamination.

## **8. OBSERVATIONS OF BOROUGH SOLICITOR**

#### General

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

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

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

#### Planning Conditions

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

### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

### Equalities and Human Rights

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

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

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

## **9. OBSERVATIONS OF THE DIRECTOR OF FINANCE**

Not applicable

## **10. CONCLUSION**

This application seeks alterations to the internal layout of a consented Prior Approval under planning ref: 40050/APP/2017/2438 to remove the sixth floor from Bridge House and to alter the unit mix across the site from 15 x studios, 220 x 1 beds and 2 x 2 bed units to the proposed 22 x studios, 149 x 1 beds and 58 x 2 beds.

As previously approved, a total of 359 off street car parking spaces, including 37 disabled bays, would be provided to serve future occupants. The spaces will be located within the existing multi-storey car park and hard surfaced parking areas which serve the existing office use. 17 Motorcycle parking spaces are proposed and facilities for the secure storage of 305 cycles will be provided within the buildings for the occupiers of the residential units being considered within this application (185 cycle spaces within Bridge House and 60 in each of Waterside House and Riverview House). This represents an increase of 66 cycle spaces compared to the original Prior Approval ref 40050/APP/2017/2438.

The proposal falls to be considered within Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (England) Order 2016 which allows for such development subject to a determination by the Local Planning Authority as to whether Prior Approval will be required.

The application has been assessed against the relevant criteria and subject to conditions and the securing of highway and public realm obligations through a Deed of Variation to the original Section 106 Legal Agreement, the application is recommended for approval.

## **11. REFERENCE DOCUMENTS:**

Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

The Local Plan: Part 1 - Strategic Policies (2012)

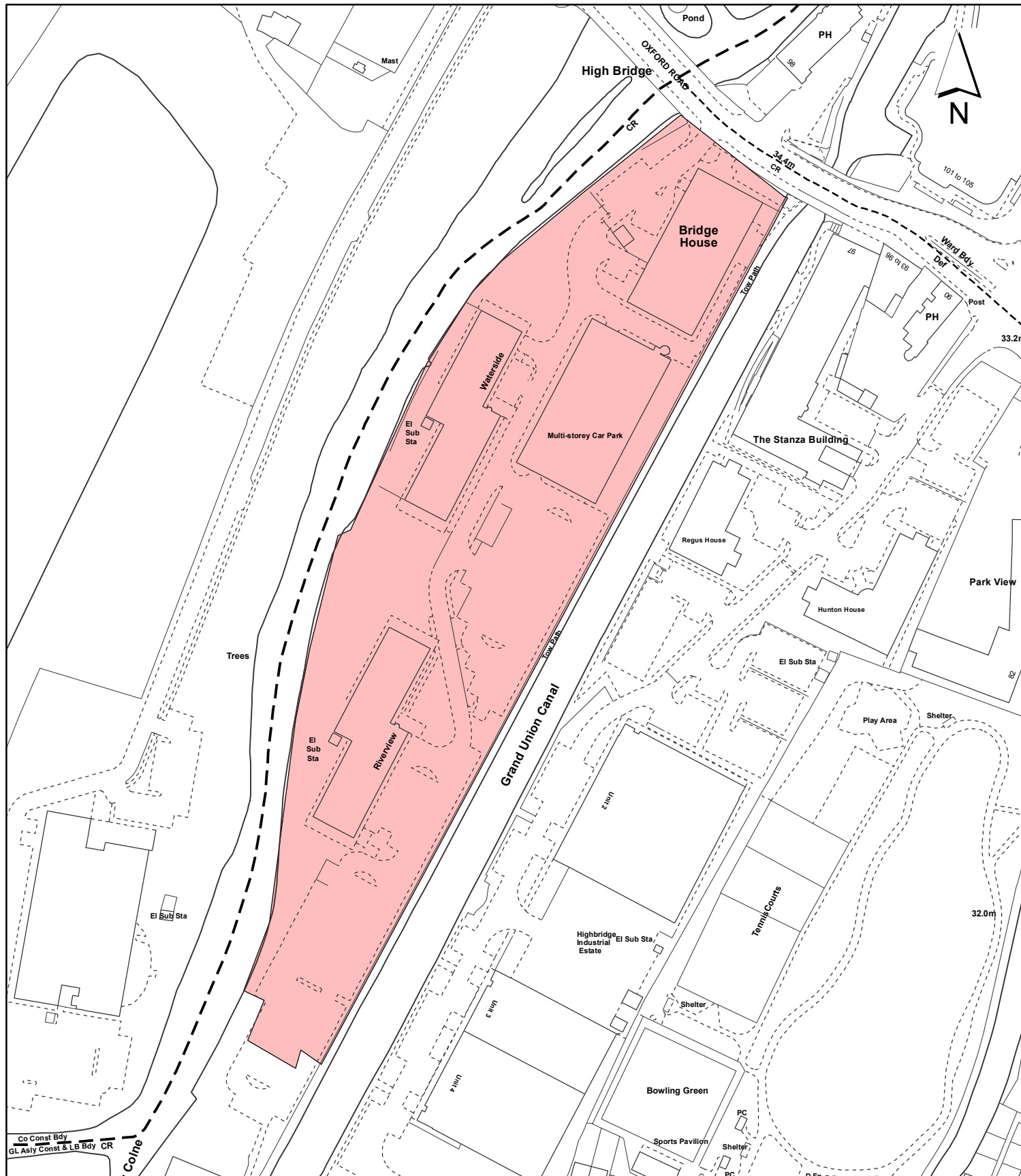
The Local Plan: Part 2 - Development Management Policies (2020)

The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019)

**Contact Officer:**

Ed Laughton



# Notes:

 Site boundary

For identification purposes only.

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Site Address:

**Bridge House, Riverview House & Waterside House  
Oxford Road**

Planning Application Ref:

**40050/APP/2019/1865**

Planning Committee:

**Major Page 248**

Scale:

**1:1,850**

Date:

**February 2020**

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

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON



## Report of the Head of Planning, Transportation and Regeneration

**Address** 19-22 CHIPPENDALE WAYE UXBRIDGE MIDDX

**Development:** Erection of a block of 12 No. flats comprising of 7x1 bed, 4x2 bed and 1x3 bed apartments with associated parking, landscaping, access and amenity.

**LBH Ref Nos:** 67544/APP/2019/1978

**Drawing Nos:** AAL-19-152-P03 REV C  
Croft - Transport Assessment  
C2217-REV-A-R1  
15045-NEA-01  
Design and Access Statement - June 2019  
AAL-19-152-P04 REV A  
AAL-19-152-P05 REV A  
AAL-19-152-P01 REV E

**Date Plans Received:** 11/06/2019 **Date(s) of Amendment(s):** 11/06/2019

**Date Application Valid:** 02/08/2019

### 1. SUMMARY

The application seeks consent for the redevelopment of the existing residential plots to provide 12 new residential units comprising of 7x1 bed, 4x2 bed and 1x3 bed units with associated access, car parking and landscaping.

Following the demolition of both the dwellings at No19 and No 22 Chippendale Waye, planning consent was granted for the erection of 4 x 3 bedroom houses with associated parking and external works (planning reference 67544/APP/2018/4323). It should be noted that in 2011 an earlier approval was granted for 12 flats.

The principle of development is established through the existing residential use of the site and further compounded by the above planning consent therefore it is the intensification of the use of the site which is being assessed. Whilst the application proposes a taller building than the properties which bound the site, the wider street scene comprises of a variety of taller buildings and the proposed height of the building would be acceptable within the context of the local streetscene.

As such the application is recommended for approval.

### 2. RECOMMENDATION

**1. That delegated powers be given to the Head of Planning, Transportation and Regeneration to grant planning permission subject to:**

**A) Entering into an agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or S278 of the Highways Act 1980 (as amended) and/or other appropriate legislation to secure:**

**The obligations sought are as follows:**

- 1. Off-site Affordable Housing - Contribution of £150,000**
- 2. Applicant agrees to restrict the occupiers from applying for parking permits for**

all on street parking control zones.

3. **Employment Strategy and Construction Training Contribution** - 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.

4. **Carbon off-set contribution** as required by an approved Energy Assessment

5. **Project Management & Monitoring Fee: Project Management & Monitoring Contribution** equal to 5% of the total cash contributions. Details shall be in accordance with the Council Planning Obligations Supplementary Planning Document 2014

6. **S278 agreement** to carry out works to facilitate a new vehicle crossover to the front, eastern end of the site to allow for the bins to be carried or wheeled out to the collection vehicle.

**B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 and/or 278 Agreements and any abortive work as a result of the agreement not being completed.**

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

**D) If the Legal Agreement has not been finalised by 19 April 2020 (or such other timeframe as may be agreed by the Head of Planning, Transportation and Regeneration), delegated authority be given to the Head of Planning, Transportation and Regeneration 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 affordable housing, construction training, carbon offset and parking restrictions). The proposal therefore conflicts with Policy H2 of the Hillingdon Local Plan Part 1 (2012), DMCI 7 of the Hillingdon Local Plan : Part 2 - Development Management Policies (Jan 2020) and Policies 3.12 and 5.2 of the London Plan (2016).'**

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

**1 HO1 Time Limit**

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

**REASON**

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

**2 HO2 Accordance with approved**

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

AAL-19-152-P03 REV C  
AAL-19-152-P04 REV A  
AAL-19-152-P01 REV D  
AAL-19-152-P05 REV A

#### REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **3 RES5 General compliance with supporting documentation**

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

Amasia -Design and Access Statement  
15045-NEA-01 - Noise Assessment  
C2217-REV-A-R1 - FRA  
Croft - Transport Assessment

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

#### REASON

To ensure that the development complies with the objectives of Policies DMT1, DMT2, DMT 6, DMHB 11 and DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020)

### **4 NONSC SUDS**

Prior to commencement,(excluding demolition and site clearance) a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority.

The scheme shall clearly demonstrate how it, manages water and demonstrate ways of controlling the surface water on site by providing information on:

#### a) Suds features:

i. incorporating sustainable urban drainage (SuDs) in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided,

ii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus Climate change. This rate should be presented per hectare as well as the total for the whole site.

iii. where it is intended to have above ground storage, overland flooding should be mapped, both designed and exceedance routes above the 100, plus climate change, including flow paths depths and velocities identified as well as any hazards, ( safe access

and egress must be demonstrated).

iv. Where infiltration techniques (soakaway) a site investigation must be provided to establish the level of groundwater on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).

b) Minimise water use.

i. incorporate water saving measures and equipment.

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

c) Long Term Management and Maintenance of the drainage system.

i. Provide a management and maintenance plan

ii Include details of Inspection regimes, performance specification, (remediation and timescales for the resolving of issues where a PMC).

lii Where overland flooding is proposed, the plan should include the appropriate actions to define those areas and actions required to ensure the safety of the users of the site should that be required.

iii. Clear plans showing all of the drainage network above and below ground. The responsibility of different parties such as the landowner.

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

## REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.13, 5.15 Flood Risk Management of the London Plan and National Planning Policy Framework (2019), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014)

### **5 OM19 Construction Management Plan**

Prior to development commencing, the applicant shall submit a demolition and construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking

provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).

(vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.

(vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

#### REASON

To safeguard the amenity of surrounding areas in accordance with Policy DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

### **6 RES7 Materials (Submission)**

No development shall take place until details of all materials and external surfaces, including details of balconies have been submitted to and approved in writing by the Local Planning Authority. 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 DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

### **7 RES9 Landscaping (car parking & refuse/cycle storage)**

No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. 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 including pollution absorbing planting around the front boundary and cultivation works to be undertaken,

1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate, which shall include pollution absorbing tree species along the Chippendale Way road frontage.

#### 2. Details of Hard Landscaping

2.a Refuse Storage

2.b Cycle Storage demonstrating 12 secure covered cycle spaces

2.c Means of enclosure/boundary treatments

2.d Car Parking Layouts demonstrating 4 car parking spaces (including demonstration that 1 active and 3 passive of all parking spaces are served by electrical charging points)

2.e Hard Surfacing Materials

2.f External Lighting

#### 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 14 of the Hillingdon Local Plan : Part 2 - Development Management Policies (Jan 2020) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (2015).

### **8 SUS1 Energy Efficiency Major Applications (full)**

Prior to commencement of development an Energy Assessment for the 12 units hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall set out the annual baseline regulated energy demand (kwhr) as per 2013 Building Regulations (or subsequent amendments) and associated carbon emissions (kgCO<sub>2</sub> and tCO<sub>2</sub>). The assessment shall then set out the measures and technology required to achieve a 100% reduction (zero carbon) in the CO<sub>2</sub> associated with the baseline regulated energy demand; these measures must be sufficiently evidenced with corresponding details and specifications including the location of low and zero carbon technology (i.e. roof plans showing the inclusion of PV panels). The updated Energy Assessment must clearly set out any shortfall (tCO<sub>2</sub>) of the zero carbon standard. The development must proceed in accordance with the approved updated Energy Assessment.

#### REASON

To ensure the proposals contribute to a reduction in CO<sub>2</sub> in accordance with London Plan Policy 5.2 (2016).

### **9 NONSC Imported Soils**

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. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to and approved in writing by the Local Planning Authority.

#### REASON

To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with Policy DMEI 12 and DMEI 13 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **10 RES26 Contaminated Land**

Before any part of this development is commenced a site survey to assess contamination at the site shall be conducted to the satisfaction of the Council and a remediation scheme,

for addressing any unacceptable concentrations of contaminants present at the site, shall be submitted to and approved by the Local Planning Authority. The remediation scheme shall include an assessment of the extent of any identified contaminants and provide in detail the remedial measures to be taken to avoid risk to the occupiers and the buildings when the site is developed. All works which form part of this remediation scheme shall be completed before any part of the development is occupied (unless otherwise agreed in writing by the Local Planning Authority). The condition will not be discharged until verification information has been submitted for the remedial works.

**REASON**

To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with Policy DMEI 12 and DMEI 13 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

**11 NONSC Non Standard Condition**

No contaminated soils or other materials shall be imported to the site. All soils used for gardens and/or soft landscaping purposes shall be clean and free of contamination. Site derived soils and imported soils shall be tested for chemical contamination and the results of this testing shall be submitted for approval to the Local Planning Authority.

**REASON**

To ensure that the occupants of the development are not subject to any risks from soil contamination, in accordance with policy OE11 of the Hillingdon Local Plan Part 1 and DMEI 14 of the Hillingdon Local Plan - Part 2 - Development Management Policies (January 2020).

**12 NONSC Noise**

The noise level in rooms at the development hereby approved shall meet the internal noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

**REASON :** To ensure that the amenity of the occupiers of the proposed development is not adversely affected by noise in accordance with policy DMHB 11 of the Hillingdon Local Plan - Part 2 - Development Management Policies (January 2020).

**13 NONSC Noise**

An enhanced sound insulation value  $D_{nT,w}$  and  $L'_{nT,w}$  of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings, namely [eg. living room and kitchen above bedroom of separate dwelling]. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

**REASON**

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by noise in accordance with policy DMHB 11 of the Hillingdon Local Plan - Part 2 - Development Management Policies (January 2020).

**14 NONSC Accessibility**

Prior to works commencing, details of step free access via the principal private entrance shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building.

**REASON**

To ensure that an appropriate standard of housing stock, in accordance with London Plan policy 3.8 c (2016), is achieved and maintained.

**15 NONSC Accessibility**

The dwellings hereby approved shall 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.

**REASON:**

To ensure that an appropriate standard of housing stock, in accordance with London Plan policy 3.8 c (2016), is achieved and maintained.

**16 NONSC Non Standard Condition**

The development hereby approved shall ensure that 10% (1) of the residential units are constructed to meet the standards for Category 3 M4(3) dwelling with a floor plan at no less than 1:100 submitted for each of the different M4(3) units and agreed in writing by the Local Planning Authority. 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. All remaining units designed to the standards for 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.

**REASON**

To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 d (2016), is achieved and maintained.

**17 RES22 Parking Allocation**

The residential units hereby approved shall not be occupied until a parking allocation scheme has been submitted to, and approved in writing by, the Local Planning Authority. The parking allocation scheme shall, as a minimum, include a requirement that all on-site car parking shall be allocated and dedicated for the use of the family and disabled units hereby approved and shall remain allocated and dedicated in such a manner for the life-time of the development.

**REASON**

To ensure that an appropriate level of car parking provision. is provided on site in accordance with Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020)

**18 RES24 Secured by Design**

The dwelling(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 dwelling 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 exercising 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 reflect the guidance contained in the Council's SPG on Community Safety By Design and to ensure the development provides a safe and secure



environment in accordance with London Plan (2016) Policies 7.1 and 7.3.

## **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 Plans (2012 and 2020) 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.

DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 2	Reducing Carbon Emissions
DMEI 9	Management of Flood Risk
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 4	Residential Conversions and Redevelopment
DMH 6	Garden and Backland Development
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.8	(2016) Housing Choice
LPP 6.13	(2016) Parking
LPP 6.9	(2016) Cycling
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.6	(2016) Architecture
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places

### **3 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).

**4            170            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 the Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

**5            173            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@hillingsdon.gov.uk](mailto:planning@hillingsdon.gov.uk). The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

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

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

**6**

The removal and making good of the existing carriageway crossing and provision of new will need to be subject of a Section 184 application via the Highways Act 1980

**3.        CONSIDERATIONS**

**3.1      Site and Locality**

The application site measures approximately 0.07 hectares in size and is located on the

north side of Chippendale Way within close proximity of Uxbridge Town Centre. The site was previously occupied by 4 semi-detached houses but were demolished due to poor condition, leaving the plot vacant.

The plot is situated between rows of semi-detached houses and Uxbridge Early Year's Centre, with vehicular access via a service road to the rear of the houses. To the rear of the site are parking facilities, an access road and a disused playground.

To the northeast is a listed building at no. 59 Park Road and properties with access from Grove Way, to the south east is the Uxbridge Early Years Centre just beyond Chippendale Alley; the southwest is Chippendale Way itself and the rear gardens associated with 23-28 Chippendale Way and to the northwest by an existing service road serving the site and the rear of properties 4-16 Montague Road.

### **3.2 Proposed Scheme**

The proposal seeks full planning consent for the construction of a new three storey building comprising of 7 x 1 bed, 4 x 2 bed and 1 x 3 bedroom apartments with associated landscaping and parking.

### **3.3 Relevant Planning History**

67544/APP/2011/736      19-22 Chippendale Way & Car Park Area To Rear Of 23-28 Chippen  
Erection of a two storey building comprising 12, one-bedroom supported housing units, along with ancillary office space and associated landscaping for new building, alterations to car parking and access arrangements (both vehicular and pedestrian) (involving demolition of dwellings known as 19, 20, 21 and 22 Chippendale Way) (Outline Application).

**Decision:** 11-10-2011    Approved

67544/APP/2012/2024      19-22 Chippendale Way & Car Park Area To Rear Of 23-28 Chippen  
Reserved Matters (Scale and Appearance) in compliance with conditions 2 and 3 of planning permission ref: 67544/APP/2011/736 for the erection of a two storey building comprising 12, one-bedroom supported housing units, along with ancillary office space and associated landscaping for new building, alterations to car parking and access arrangements (both vehicular and pedestrian) (involving demolition of dwellings known as 19, 20, 21 and 22 Chippendale Way).

**Decision:** 06-11-2012    Approved

67544/APP/2018/4323      19-22 Chippendale Way Uxbridge Middx  
Erection of 4 x 3 bedroom houses with associated parking and external works

**Decision:** 05-02-2019    Approved

67544/PRC/2019/64      19-22 Chippendale Way Uxbridge Middx  
Erection of apartment building consisting of 12 apartments

**Decision:** 13-05-2019    PRC

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

67544/APP/2018/4323 - Approved - Erection of 4 x 3 bedroom houses with associated parking and external works

67544/APP/2012/2024 - Approved - Reserved Matters (Scale and Appearance) in compliance with conditions 2 and 3 of planning permission ref: 67544/APP/2011/736 for the erection of a two storey building comprising 12, one-bedroom supported housing units, along with ancillary office space and associated landscaping for new building, alterations to car parking and access arrangements (both vehicular and pedestrian) (involving demolition of dwellings known as 19, 20, 21 and 22 Chippendale Way).

67544/APP/2011/736 - Approved - Erection of a two storey building comprising 12, one-bedroom supported housing units, along with ancillary office space and associated landscaping for new building, alterations to car parking and access arrangements (both vehicular and pedestrian) (involving demolition of dwellings known as 19, 20, 21 and 22 Chippendale Way) (Outline Application).

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

London Borough of Hillingdon Development Plan (from 17 January 2020)

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

1.2 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)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

1.3 The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

1.4 Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this

Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.H1 (2012) Housing Growth

Part 2 Policies:

DMCI 7 Planning Obligations and Community Infrastructure Levy

DMEI 2 Reducing Carbon Emissions

DMEI 9 Management of Flood Risk

DMT 1 Managing Transport Impacts

DMT 2 Highways Impacts

DMT 6 Vehicle Parking

DMH 1 Safeguarding Existing Housing

DMH 2 Housing Mix

DMH 4 Residential Conversions and Redevelopment

DMH 6 Garden and Backland Development

DMHB 11 Design of New Development

DMHB 12 Streets and Public Realm

DMHB 14 Trees and Landscaping

DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.8	(2016) Housing Choice
LPP 6.13	(2016) Parking
LPP 6.9	(2016) Cycling
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.6	(2016) Architecture
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places

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

**5.1** Advertisement Expiry Date:- **13th September 2019**

**5.2** Site Notice Expiry Date:- **11th September 2019**

## **6. Consultations**

### **External Consultees**

Letters were sent to adjoining neighbours and a site notice was erected. All forms of consultation expired on 11-09-19 . 2 comments were received raising concerns with the following:-

- Privacy of the surrounding properties (overlooking)
- Location of the bin storage
- Lack of car parking
- Height of the building is excessive
- Drop off point for those who interact with the Early Years Centre would be lost
- Further congestion problems

### **Internal Consultees**

#### **TREES AND LANDSCAPING:**

This site is a Council-owned vacant plot which has been cleared and boarded up on the north side of Chippendale Way. According to aerial photographs natural regeneration has occurred and the site is covered with self-set colonist vegetation. There are no TPO's or Conservation Area designations affecting the site. COMMENT the site was the subject of a previous planning application ref. 2018/4323, which was approved. No trees or other landscape features of merit will be affected by the proposal. The development will have a shallow front garden facing Chippendale Way and a rear

garden with four parking spaces to the rear, accessed via the rear service road. The current proposal is similar to the approved scheme, however, the following details are noted: 1. The proposal now promotes flats rather than houses. 2. The front elevation has been moved forward towards Chippendale Way and in front of the existing building line. 3. The D&AS is weak and does not address all of the recommended items listed in the guidance. For example, there is no analysis of the existing landscape or comment about the potential landscape quality.

**RECOMMENDATION** If you are minded to approve this proposal it should be accompanied by a robust landscape proposal secured by condition DMHB14 .

#### HIGHWAYS:

##### Site Characteristics & Background

The site is located in a residential catchment just to the north and on the 'edge' of Uxbridge town centre fronting onto Chippendale Way. As a consequence of the sustainable location, the PTAL rating for the site is rated as 4 and borders on an area equating to 5 making the site highly accessible by public transport thereby diminishing the need to own and travel by private motor car. The address is currently a vacant site which once contained a row of residential housing which was demolished due to dilapidation. There is an extant but now expired consent for a residential development containing 12 one bed units within the proposed site envelope. In addition the address benefits from a more recent extant permission for 4 three bedroom houses (67544/APP/2018/4323).

The site backs onto a rear service road which is designated as housing land (i.e. un-adopted public highway) and allows access to neighbouring residential properties and the adjacent 'Early Years' centre and associated gated car park allocated for that use. Other residential dwellings in the locality exhibit some on-plot parking provisions and the surrounding road network is extensively covered by parking controls which include a Controlled Parking Zone (CPZ) incorporating a residential parking scheme operating from 9am to 10pm for seven days per week. The rear service road is currently unrestricted but will in due course be encompassed within the above CPZ with residential parking provisions.

##### Parking Provision

Hillingdon Local Plan: Part 2 states that new development will only be permitted where it is in accordance with the Council's adopted parking standards. It is proposed to construct a substantive single block incorporating 12 flats with 4 on-plot parking facilities arranged in a communal fashion to the rear of the units accessed from the aforementioned rear service road. In order to comply with the adopted parking standard, the maximum on-plot requirement would demand up to 1.5 spaces per unit totalling 18 spaces. A quantum of 4 spaces are proposed hence the proposal falls well below this maximum level of requirement.

It is noted that the 'edge of town centre' location and surrounding residential catchment/road network exhibit certain characteristics which could arguably support a lower quantum of on-plot parking provision. As mentioned earlier - the PTAL is relatively high and the local area is covered by an extensive daytime/evening CPZ with off-street parking facilities for some of the surrounding residential properties in the area. These characteristics combined promote the use of sustainable transport modes thereby reducing the need for ownership and use private motor transport which inherently reduces general on-street parking demand and subsequent parking pressures on the highway. Also, once included within the CPZ, a 'resident permit restriction' could be imposed on the address in order to prevent future occupiers from obtaining parking permits for the local area when the adjacent CPZ comes into play. This would further help deter potential car ownership/usage from within the site. This would need to be secured by legal agreement under Section 106 of the Town and Country Planning Act 1990 (T&CPA 1990).

On balance, the provision of 4 on-plot spaces is therefore considered borderline acceptable in this

case.

#### Cycling Parking Provision

In terms of cycle parking there should be a provision of at least 1 secure and accessible space for each of the 1- 2 bedroom flatted units (totalling 11 spaces) with 2 spaces for the 3 bedroom unit in order to conform to the adopted minimum borough cycle parking standard. In total 13 spaces are sought. 12 are shown on plan hence an additional space should be provided either by way of amended submission or via planning condition.

#### Vehicular Access Arrangements

To allow access from the existing rear service road to the proposed 4 on-plot parking spaces, an existing 'bell-mouth' arrangement would be utilised as is. This arrangement is considered acceptable in principle.

#### Vehicular Trip Generation

Hillingdon Local Plan: Part 2 requires the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Clearly the proposal would raise the level of vehicular activity to and from the site given its current dormant status. It is noted that some vehicular traffic had previously been generated when the now demolished housing units were in place hence the net impacts are unlikely to exhibit a significant variance that would be prejudicial to road capacity. Nevertheless the anticipated uplift in trip generation related to the 12 new dwelling units as compared with the vacant site would clearly rise but it does not raise any immediate highway concerns with traffic generation not expected to exceed 3-4 vehicle movements during the peak morning and evening hours. Such uplift is considered marginal in generation terms and therefore can be absorbed within the local road network without notable detriment to traffic congestion and road safety.

Road safety benefits are also achieved by way of the fact that traffic movement into and out of the site would emerge onto the rear service road and then onto a formal road junction which connects directly to Chippendale Way thereby concentrating vehicles onto a single aperture in lieu of multiple access points onto this main road which could otherwise prejudice general road safety.

#### On-Plot Refuse Storage

Refuse collection would be executed via the rear service road as is the case at present for the existing neighbouring properties. Although this arrangement is not ideal in terms of the restricted manoeuvring space within the service road which causes difficulty for refuse vehicles to enter and depart in a forward gear onto Chippendale Way (which is encouraged on best practice safety grounds), the collection regime is already established hence the new units would continue to be served by-way of the established collection methodology. The bin store location is positioned in a manner which conforms to the Council's waste collection standards hence there are no further observations.

#### Construction Logistics Plan (CLP)

A full and detailed CLP will be a requirement to help protect the amenity/safety of the local residential road network thereby avoiding/minimising potential detriment to the public realm. It will need to be secured under a suitable planning condition.

#### Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not measurably exacerbate congestion or parking stress, and would not raise any highway safety concerns, in accordance with policies DMT1, DMT2 and DMT 6 of the Hillingdon Local Plan : Part 2 - Development Management Policies 2020 and policies 6.3,6.9, and 6.13 of the London Plan (2016).



#### CASE OFFICER COMMENT:

Whilst a proportion of the application site does fall within PTAL zone 4 Chippendale Way itself falls within PTAL 5 and the site remains sits directly on the boundary of the town centre which mostly benefits from the highest PTAL rating. The refuse storage and collection arrangements have since been changed by relocating the bin store to close to the bike storage towards the eastern flank wall and a path. This allows the bins to be access by the waste crew within a compliant distance and prevents collection from the rear access road which would have involved the waste crew having to reverse at an awkward angle into the collection area.

#### FURTHER HIGHWAY COMMENTS RELATING TO THE ABOVE

As discussed - the presented detail is sound from the perspective of highway location.

#### ACCESS:

"Any grant of planning permission should include the following conditions: Prior to works commencing, details of step free access via all communal and principal private entrances shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building. REASON To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 (c) and (d) is achieved and maintained. The development hereby approved shall ensure that 10% of the residential units are constructed to meet the standards for Category 3 M4(3) dwelling, with all remaining units designed to the standards for 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. REASON: To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 (c) and (d) is achieved and maintained.

#### FLOOD WATER MANAGEMENT

No objection subject to condition. The applicant has submitted a flood risk assessment and drainage strategy (Nimbus Engineering report dated July 2019) to accompany the application. The drainage strategy confirms the approach to managing surface water on the site, including the use of permeable paving and an expanse of green roof, discharging to the surface water sewer at a rate of 0.3l/s. The drainage strategy identifies elements that are to be clarified during detailed design and therefore the details of the drainage network should be secured with an appropriately worded condition. The detailed design should be in line with the approaches proposed in the submitted drainage strategy.

#### CONTAMINATED LAND

Please apply the following conditions: - 1. Before any part of this development is commenced a site survey to assess contamination at the site shall be conducted to the satisfaction of the Council and a remediation scheme, for addressing any unacceptable concentrations of contaminants present at the site, shall be submitted to and approved by the Local Planning Authority. The remediation scheme shall include an assessment of the extent of any identified contaminants and provide in detail the remedial measures to be taken to avoid risk to the occupiers and the buildings when the site is developed. All works which form part of this remediation scheme shall be completed before any part of the development is occupied (unless otherwise agreed in writing by the Local Planning Authority). The condition will not be discharged until verification information has been submitted for the remedial works. 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. 2. 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. All imported soils shall be laboratory tested for chemical contamination, and the results of analyses shall be submitted to the Local Planning Authority for approval.

REASON: To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with policy DMEI 12 of the Hillingdon Local Plan : Part 2 - Development Management Policies (Jan 2020)

#### AIR QUALITY

There was no specific air quality assessment with the application. However, this development is within the Uxbridge Air Quality Focus Area and the close proximity of the residential units to the road therefore consideration should be given to protect the future residents from emissions from the road. A condition to encourage the use of green infrastructure, incorporating pollution absorbing planting, to protect future residents from emissions from the road should be considered.

I believe there is a specific landscaping condition which has been worded to capture this.

#### POLICY

There are no general comments on the principle development. The key policy issue is the requirement for the provision of affordable housing. Policy H2 of the Local Plan Part 1 and policy DMH7 of the emerging Local Plan Part 2 require developments of 10 or more units to maximise the delivery of affordable with a minimum target of 35%. Policy DMH 7 also applies the requirement for affordable housing for additional units created through subsequently amended planning applications. This includes where a development under the 10 unit threshold threshold is amended to have 10 or more housing units. It does appear that any affordable housing is currently proposed on site. I can see on Ocella that an FVA has been provided which should be assessed in accordance with the guidance in the Mayor's Affordable Housing and Viability SPD. In accordance with policy, the option of offsite provision or payment in lieu should also be considered where on site provision is not demonstrated to be unviable.

#### S106 AND AFFORDABLE HOUSING

67544/APP/2019/1978 - 19-22 CHIPPENDALE WAYE

As requested, please see my comments below:

- (1) the proposed scheme is for erection of a block of 12 No. flats comprising of 7x1 bed, 4x2 bed and 1x3 bed apartments with associated parking, landscaping, access and amenity.
- (2) It should be noted that the site was sold at an auction. The applicant's agent submitted an FVA report that did not include any reasoning and support justifying the auction price for the approved 4 unit housing scheme. The onus is on the applicant to provide this justification.
- (3) The National Planning Policy Framework (NPPF) viability guidance is very clear that purchase price is no longer an acceptable approach for establishing a site's benchmark land value.
- (4) The Council appointed FVA Assessor has made an appraisal of the residual land value of the previous approved scheme.
- (5) There are 28 habitable rooms within the current proposed scheme which is an uplift from the approved 4 house scheme. Therefore, based on the calculations made this would result in an

overage.

(6) The Council FVA Assessor analysis based on adopting optimistic assumptions results in a land value for the approved 4 unit housing scheme. The FVA Assessor has previously advised (again using their assumptions) that the proposed scheme assuming 100% market housing would result in an optimal residual land value.

(7) Planning guidance does not distinguish between the sale of public and private sector land and ultimately the purchase price of any site should take full account of policy requirements.

(8) For the proposed planning scheme in view of the circumstances, it is considered reasonable for the applicant to contribute £150,000 as a financial sum towards affordable housing off-site provision.

(9) The above recommendation is subject to a S106 agreement including the following Head of Term:

- contribution of £150,000 as a financial sum towards affordable housing off-site provision

#### NOISE

Erection of a block of 12 No. flats comprising of 7x1 bed, 4x2 bed and 1x3 bed apartments with associated parking, landscaping, access and amenity.

As seen in the revised drawings.

The acoustic report refers to the external noise environment surrounding the proposed development. The applicant has demonstrated what the ambient noise levels surrounding the site and the level of mitigation required to achieve the standards cited in BS 8223:2014. Sound reduction requirements for the external building fabric and glazed elements of the residential units have been provided and is deemed satisfactory however the application states 12 residential units and the drawings show different uses /rooms in the adjoining residential unit on specific floors. Namely between the first floor ,second floor and third floor(Seen in drawings of flats 5 ,9 and 12)

Therefore in light of the above kindly consider the following noise conditions

1.Condition ; The noise level in rooms at the development hereby approved shall meet the internal noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

Reason: To ensure that the amenity of the occupiers of the proposed development is not adversely affected by road traffic and other noise in accordance with EM8 Part 1 Local Policy.

2. Separation of noise sensitive rooms in neighbouring flats

Condition: Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value DnT,w [and L'nT,w] of at least 5dB above the Building Regulations value, for the floor/ceiling /wall structures separating different types of rooms/ uses in adjoining dwellings, namely [eg. living room and kitchen above bedroom of separate dwelling]. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with EM8 Part 1 Local Policy.

INFORMATIVES for Demolition and Construction:

## 1 Permitted hours for building work

Construction and demolition works and associated activities at the development, audible beyond the boundary of the site should not be carried out other than between the hours of 0800 - 1800hrs Mondays to Fridays and 0800 - 1300hrs on Saturdays and at no other times, including Sundays and Public/Bank Holidays, unless otherwise agreed with the Environmental Health Officer.

## 2.Dust

Best Practicable Means (BPM) should be used in controlling dust emissions, in accordance with the Best Practice Guidance by the GLA 2014 for The Control of Dust and Emissions from Construction and Demolition

## WASTE MANAGEMENT

No objections to amended layout and new crossover for waste collection from Chippendale Way.

## 7. MAIN PLANNING ISSUES

### 7.01 The principle of the development

The National Planning Policy Framework (2019) 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.

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.

London Plan (2016) policy 3.3 similarly seeks to ensure that London's housing needs are met. This objective is reiterated in the Mayor of London's Supplementary Planning Guidance (SPG) on Housing, although it must be noted that the SPG is clear that in achieving housing targets, full account must be given to other policy objectives and that to address London's strategic housing requirement and reconcile any local disparities between housing need and supply, boroughs should identify and proactively seek to enable extra housing capacity through the preparation of their Local Plans.

Notwithstanding this general policy support for new residential developments, it is clear that careful consideration must be given to the ability of development proposals to also meet other planning policies and also the ability of authorities to meet their housing needs.

The application site is located on the boundary line of the Uxbridge Metropolitan Town Centre as defined within the Local Plan : Part 2 - Development Management Policies (Jan 2020) although it does not form part of it.

The principle of development is established through the existing residential use of the site and recent planning consent granted for 4 new 3 bed residential dwellings. The proposal seeks to intensify this existing and consented residential use of the site and therefore the principle of development is considered to be acceptable.

### 7.02 Density of the proposed development

London Plan Policy 3.4: Optimising housing potential, aims to optimise the housing potential of sites whilst recognising that there are a wide range of factors that need to be taken into account in determining planning decisions relating to the residential density of any proposal.

The London Plan includes a density matrix at Table 3.2, and in paragraph 3.28 it recognises that the ranges within the density matrix are broad. It goes on to state that these broad ranges 'provide the framework within which boroughs can refine local approaches to implementation of this strategic policy through their LDFs.'

Policy 3.4 of the London Plan (2016) seeks to optimise housing potential and includes a sustainable residential quality (SRQ) matrix for calculating the optimal density of residential development of a particular site. Optimal density levels vary based on the Public Transport Access Level (PTAL) score for the area in which the site is located, the character of the area (central, urban or suburban) and the type of accommodation being provided (based on the amount of habitable rooms per unit).

Notwithstanding the above policy reference in the latest version of the emerging London Plan (Dec 19) demonstrates the removal of the density matrix table 3.2 which is used as a guide for decision makers to assess optimal density for housing sites. It is therefore considered that whilst referred to above the optimal density should be assessed against the Local Planning Authorities density matrix within its adopted Local Plan.

Policy DMH 2: Housing Mix 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 proposal seeks full planning consent for 12 new residential units comprising of 7x1 bed, 4x2 bed and 1x3 bed units. Whilst the latest version of the Hillingdon Strategic Housing Assessment (November 2016) states that there is a general need for more family sized units (3 bed and above) it is considered that smaller sized units should be located within town centres. Given the site's location on the boundary of the town centre, the need for housing and the inclusion of a 3 bed unit, the proposed unit mix is considered acceptable in policy terms.

Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.3. Developments will be expected to meet habitable rooms standards.

Policy H10 of the Intend to Publish version of the London Plan (Part A6) also states that unit mix should take account of the nature and location of the site with a higher proportion of one and two bed units generally deemed more appropriate in town centre locations, such as this site.

Whilst a proportion of the site does fall within PTAL rating 4 as stated in the Officer comment above, a search of the TFL WebCAT using 19-22 Chippendale Way as the address results in a PTAL rating of 5 therefore the density calculation should be undertaken using PTAL 5 and not 4.

Table 5.3 provides a list of residential settings alongside the PTAL ratings and the optimal density range. The location is considered to be central given its 4/5 PTAL rating therefore the optimal density range should be within 495-1,100 habitable rooms per hectare and 165-405 units per hectare with an average of 3 habitable rooms per unit. The proposed

scheme would result in a density of 167 units per hectare and 391 habitable rooms per hectare. As such the application proposes an overall density which would fall within the optimal density range and is therefore considered to be acceptable.

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

The application site is not located within an area important for archaeological remains, it is not sited close to any statutory listed building nor is it located within or on the fringes of a Conservation Area. Notwithstanding this the application site is located in approximately 17 metres south west, from the Old Stable, 59 Park Road which is locally listed.

The application site is located within what is considered the setting of a Locally Listed building therefore Policy DMHB 3 is relevant to the assessment of the proposal. The policy provides three key points for which a proposal should adhere to however section A) is the only relevant point given that the proposal is not for alterations to the Listed Building itself. Point 'A)' states that there is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications.

With regards to the potential impact to the setting of the Locally Listed Building and in particular the views of the Old Stable from Park Road, the building is set against the backdrop of the much larger industrial, functionally design Intu Car Park which towers above the Locally Listed Building. The proposed rear elevation of the new building would effectively replace the back drop which is formed by the Intu car park and given its lightweight brick colour its various set-ins it is considered that the proposed development would improve the views taken from the front of the Old Stable from Park Road.

The scheme is considered to accord with Policy DMHB 3 of the Local Plan Part 2 (2020) and would not have a detrimental impact on the setting to the Locally listed Old Stable building.

#### **7.04 Airport safeguarding**

Not applicable

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

Not applicable

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

There is a hierarchy of design policies which relate to housing development and which filter from national policy down to local level policy, each of which needs to be considered when determining an application for new housing.

At national level, Chapter 4 of the National Planning Policy Framework sets out strong principles for determining planning applications. Section 48 provides 3 key principles for which weight should be given. Point c) of this section states "the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)".

At regional level Policy D4 of the London Plan (2016) states that in order to optimise the development of housing on sites across London, a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of this policy, including minimum space standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures.

New homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. Particular account should be taken of the needs of children, disabled and older people. Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments. Housing developments are required to meet the minimum standards below.

Policy DMHB 11 of the Hillingdon Local Plan Part 2 - Development Management Policies (Jan 2020) states that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design which includes ;

- 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 undesignated, and their settings; and
  - v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C) Development will be required to ensure that the design safeguards the satisfactory redevelopment of any adjoining sites which have development potential. In the case of proposals for major development 5 sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

Chippendale Way and its surrounding area is characterised by a variety of mixed use buildings which understandably vary in scale and design given there town centre location. Whilst, in strict design terms, there is no objection to the redevelopment of the existing site, the design of any new development should harmonise with the established character of the area and enhance the visual amenities of the overall street scene.

The site is located on the north-eastern side of Chippendale Way, where residential development comprises two storey and two and a half storey semi-detached dwellings, some with private driveways, others without and plot sizes of varied depth. To the south-west of the site lies "The Intu" five storey car park and Uxbridge Heath Centre. Towards the south east of the site and adjacent to the intu car park is 1-23 penrith close which is a flatted block, 3 stories in height and is similar in terms of its bulk and massing to what is currently being proposed as part of this application. Immediately east of the site is a single storey childrens nursery which is separated by a public footpath which runs between Chippendale Way and Park Road. External materials along Chippendale Waye are a mixture of traditional and modern, including facing brickwork, tile hanging, render, cladding, metal detailing and plain roof tiles.

Whilst the immediate residential context comprises of two storey properties the composition of the buildings within the slightly wider context of the street scene should also be given consideration when assessing whether a 4 storey building would be out of character in this location. The proposed building would measure 11.7 metres in height, extend approximately 30 metres in width and would feature a rear projecting wing towards the western end of the building which results in a maximum depth of 16 metres. With regards to the proposed height, it should be noted that there is a previously approved application at this site (planing ref: 67544/APP/2011/736), whilst adopting a more traditional design the overall height of that consented building was approximately 11 metres and was evidently taller than the neighbouring two storey properties. Furthermore the front facade measured 32 metres which is in excess of the 30 metres proposed as part of the current application.

Whilst it is clear that the height of the proposed block would be greater than the two storey dwellings and the nursery which abut the site, the building has been set in from all of the boundaries and a staggered set in designed into the second and third stories. The slight front projecting bays and the set in stated above contribute to the breaking up of the front facade which reduces the bulk when viewed from the front and when travelling in both directions along Chippendale Way. Furthermore the use of a lighter brick and glazing to the third storey level further reduces the bulk and appearance of a taller building than those which abut the site as it appears subordinate to the lower levels.

In terms of the boundary treatments, the character is relatively mixed and this is understandable given the mixed use nature of the street scene. The residential properties benefit from small front gardens with approximately 1m high brick boundary walls which sit in front of vegetation (mainly hedgerows) of varying heights. The proposed block would be set back from the main highway by 3 metres and whilst this is approximately 1m forward of the front building line of the adjacent residential property No.23 it is consistent with the building line of No 27 & 28. Whilst the proposed front boundary treatment is yet to be finalised (will be secured by way of condition) the site plan indicated that boundary treatment will include vegetation along the frontage and should be a pollution absorbing species given its location on a modestly busy road. The proposed boundary treatment would therefore be considered acceptable within the street scene.

The proposed material palette consisting of a light grey brick rather than render is welcomed and has been designed to sit comfortably within this site and the varied streetscene. It is considered that the proposed development of a 4 storey flatted development in this location accords with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020).

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

As stated above policy DMHB 11 of the Hillingdon Local Plan Part 2 - Development Management Policies (Jan 2020) sets out principles of good design which will ensure the amenities of surrounding properties are protected. Paragraph 5.38 of the Hillingdon Local Plan Part 2 - Development Management Policies (Jan 2020) which supports DMHB 11 states that 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.

Policy 3.5 of the London Plan (2016) requires the design of new housing developments to consider elements that enable the home to become a comfortable place of retreat. Traffic



noise and adjacent uses can hamper the quiet enjoyment of homes.

The proposed block would be constructed approximately 4 metres from the eastern side elevation of No 23 Chippendale Way and would extend approximately 2 metres beyond its rear elevation. However potential impact of the additional depth would be offset by the staggered building line as the block tunnels towards the rear. The rear projecting wing would be set in from the side elevation of No 23 by approximately 8 metres thus reducing potential overshadowing. Furthermore a staggered set in has been applied from the first floor to the 3rd floor which reduces the potential impact to the visual amenities of No23 in terms of overshadowing and overdominance even further. In addition to the above there are no windows in the eastern elevation of No23 which serve a habitable room thus the proposed block is not considered to give rise to any significant impacts to the visual amenities of the No.23.

The proposed site plan includes a sweepth path for 21 metre overlooking distances which are relevant to the nearest residential properties. To the north of the site is the Locally Listed, Old Stable, 59 Park Road which is a detached former stable block located on the western side of Park Road. The building has undergone alterations and extensions which include a new rear L-shape wing which extends south from the main building, alongside a public footpath and tunnels around the boundary shared with the Early Years Centre car park. The elevation which runs alongside the car park is most relevant as it faces the proposed new block. A search of the planning history and site visit confirmed that this elevation benefits from 2 rooflights which provide sunlight into the kitchen area of this ground floor extension and therefore are not considered to serve a habitable room. Notwithstanding this, the proposed site plan and 21 metre sweepth path demonstrates compliance with the 21 metres separation distance stated within the above LPP2 policy.

Immediately east of the application site is a children's early years centre (nursery) which is separated by the public footpath leading from Chippendale Way through to Park Road further north. The eastern flank wall of the proposed development would be constructed 7 metres from what is a small play area within the boundaries of the nursery and which fronts Chippendale Way. The aforementioned flank wall would not feature any windows and therefore the play area would not be overlooked. Notwithstanding this the proposed plans illustrate 1 side facing window and balcony which would offer views west towards the nursery however this would be in excess of 26 metres from the boundary of the nursery and therefore is considered to be far enough away not to give rise to any overlooking or privacy issues.

Taking the above into consideration the proposed development is considered to comply with DMHB 3 & DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020)

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

##### **UNIT SIZES**

The London Plan (2016) and the 'Technical housing standards - nationally described space standard' sets out minimum sizes for various sized residential units.

Policy DMHB 16 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 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. The proposed dwelling sizes are as follows:

Unit 1	1b/2p	52.6 sqm
Unit 2	1b/1p	46.0 sqm
Unit 3	2b/3p	66.4 sqm
Unit 4	1b/2p	50.2 sqm
Unit 5	1b/2p	54.4 sqm
Unit 6	1b/1p	39.0 sqm
Unit 7	2b/3p	66.4 sqm
Unit 8	1b/2p	50.2 sqm
Unit 9	2b/2p	76.4 sqm (internal measurements meet 2b/3p)
Unit 10	2b/3p	66.4 sqm
Unit 11	1b/2p	50.2 sqm
Unit 12	3b/6p	106.8 sqm

The submitted floor plans demonstrate that the proposed units would exceed the relevant quantum of floor space required to satisfy the minimum floor space standards set out in table 5.1 which states that 1 bed 1 person unit should provide 39 sqm, 1 bed 2 person 50sqm, 2 bed 3 person 61 sqm, and a 3 bed 6 person should provide 95 sqm of internal floor space. It is clear from the measurements above that the proposed units sizes would comply with Policy DMHB 16 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020).

#### PRIVATE AMENITY SPACE

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020) sets out specific design standards to ensure that each residential unit benefits from adequate levels of amenity space. Paragraph 5.71 states dwellings on upper floors should all have access to a private balcony or terrace, where this is consistent with the overall design of the building. Houses and ground floor flats should have private gardens. The Council is keen to improve the quality of housing in the Borough and therefore communal provision of private outdoor space is generally not supported unless there are strong planning reasons and the proposed scheme is of high quality with clear planning merits.

Table 5.2 which supports Policy DMHB 18 states that the studios or 1 bed flats should provide 20 sqm, 2 bedroom flats should provide 25 sqm and 3+ bedroom flats should provide 30 sqm of amenity space. The proposed development should therefore provide 270 sqm of amenity space.

With regard to the above the proposed site plan illustrates the ground level amenity space arrangement which includes segregated amenity space for the units fronting the Chippendale way and shared communal space mainly to the rear of the building but also a smaller proportion towards the eastern boundary. Given the busy traffic flow of Chippendale Way the segregated amenity space to the front of the building has not been included within the amenity space calculations although a condition is to be added to ensure pollution absorbing planting is used for the boundary treatments. Notwithstanding this, the proposed development would provide 188 sqm of communal amenity space at

ground level and a further 56 sqm via private balconies therefore in total the scheme would provide 244 sqm of amenity space. Whilst the proposal falls 26 sqm short of the amenity space required to serve the development, this deficiency is considered marginal and is outweighed by the quality of the space provided. Furthermore there is also a small children's playground slightly further north of the site which is available for use by local residents. Consequently, on balance the proposed level of provision is considered acceptable in this instance

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

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that new development is only permitted where it is in accordance with the Council's adopted car parking standards.

The application site is located on the boundary of the Uxbridge Town Centre and benefits from a PTAL rating of 4/5 which is relatively high and means that the site benefits from high accessibility to public transport. Whilst the proposal would provide 4 parking spaces and this falls below the maximum level which the council could seek to secure, the Highways Officer who has assessed the application states that consideration should be given to the site's location on the Town Centre boundary as well as the extensive CPZ which prevents on street parking overspill from potential developments. It is not unusual in cases such as these that the Council would accept less than the maximum car parking provision on the basis that the developer enters into a legal agreement which prevents the occupants from applying for a residents permit allowing them to park on street within the CPZ areas. As such this has been added to the heads of terms within this report. Given that only 4 spaces are proposed to be provided on site, a Parking Allocation Plan condition is proposed to be imposed to ensure that the 4 spaces provided are firstly allocated to the family sized units and the disabled unit required to be provided on site.

With regards to the vehicular access arrangements this will be from the existing rear access road from Chippendale Way and will utilise an existing 'bell-mouth' arrangement which is considered acceptable.

In terms of cycle parking there should be a provision of at least 1 secure and accessible space for each of the 1- 2 bedroom flat units (totalling 11 spaces) with 2 spaces for the 3 bedroom unit in order to conform to the adopted minimum borough cycle parking standard. In total 13 spaces are sought. 12 are shown on plan hence an additional space should be provided either by way of amended submission or via planning condition.

Taking the above into consideration the proposed development is considered acceptable in terms of Highway Impacts and Parking provision.

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

Urban Design matters are discussed in detail under paragraph 7.07 of this report.

Security Issues have been incorporated into the design of the development and will be secured by a recommended condition to achieve Secure By Design accreditation.

#### **7.12 Disabled access**

London Plan policy 3.8 (d) states that ten per cent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair

accessible, or easily adaptable for residents who are wheelchair users

Paragraph 5.63 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020) states that all new homes should be designed to meet accessibility criteria as detailed in the Council's 'Accessible Hillingdon' SPD or subsequent guidance document(s). All housing of ten or more dwellings will be required to provide 10% of units which are accessible to wheelchair users and must comply with the design criteria of "Wheelchair Standard Homes" as defined in the Council's "Accessible Hillingdon" SPD.

The above paragraph supports LPP2 policy DMHB 16 policy which states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.

With regard to the above policy and supporting text, the application proposes 12 units therefore 1 fully accessible unit should be secured. Whilst the proposed site plan and floor plans indicate that Unit 1 would be accessible for wheelchair users and a dedicated path has been and entrance separate to the main front entrance has been included within the design. Notwithstanding this the proposed plan or supporting documents do not directly state this unit has the provision to meet the above policy therefore a condition has been included to secure further details.

Taking the above into consideration and the inclusion of a condition to secure full details of the 1 fully accessible unit, the proposal is considered to comply with both London Plan and LLP2 policies.

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

The London Plan (March 2016) sets the policy framework for affordable housing delivery in London. Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable housing targets. Policy 3.13 sets the threshold for seeking affordable housing on schemes with 10 or more units.

The development would introduce a total of 12 dwellings, thereby triggering the Mayor's affordable housing requirement threshold. Policy H2 of the Hillingdon Local Plan: Part 1 - Strategic Policies relates to Affordable Housing with the Council seeking 35% of all new units in the borough to be delivered as affordable housing.

The Council's Planning Obligations Supplementary Planning Document (supplementary planning guidance) adopted in July 2014 states that the Council aims to achieve a tenure mix of 70% social rent and 30% intermediate housing across the Borough, however it notes at paragraph 4.16 that subject to the provision of robust evidence, it will adopt a degree of flexibility in its application of Policy H2 to take account of tenure needs in different parts of the borough as well as the viability of schemes.

The applicant has submitted a Financial Viability Appraisal (FVA) as the scheme is unable to deliver 35% affordable housing on site, as required by policy. The FVA has been assessed by an independent assessor appointed by the Local Planning Authority.

Following the assessment of the FVA and in view of the circumstances stated within the document, it is considered reasonable for the applicant to contribute £150,000 as a financial sum towards affordable housing off-site provision. This is to be secured by way of a S106 legal agreement.

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

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

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: A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The proposed development would feature shallow gardens to the frontage allocated specifically to the ground floor units which front the road and further soft communal landscaping to the rear and eastern side of the building. In commenting on the scheme the Landscapes Officer has stated that further information is required in order to determine the suitability the landscaping however this can be secured by an appropriate landscaping condition. Further to the Air Quality Officers comments these details should include pollution absorbing planting particularly to the front of the building as the principle highway for which the building fronts is a busy road.

## **7.15 Sustainable waste management**

Policy 5.17 of the London Plan (March 2016) sets out the Mayor's spatial policy for waste management, including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling.

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

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 initial submission suggested that refuse collection would be executed via the rear service road however it is clear from the comments raised by the waste strategy manager that this arrangement would be unacceptable as the waste vehicle would be required to reverse out of the rear access road and around the bend onto Chippendale Way in order to egress from the bin store as there is inadequate turning space. A revised site plan has been submitted demonstrating the relocation of the bin store to the eastern end of the site, in front of the bike stands. The bins would then be pulled 10 metres to the front of the site onto the vehicle to be emptied on Chippendale Way. A new crossover would be required to facilitate the collection and this is to be secured via a s278 agreement. The bin store which measures 5.3 sqm would be adequate to house 2 x 80L euro bins which is considered adequate to serve the development. No specific details have been provided in relation to the materials to be used to construct the bin store and these will be secured within the proposed landscaping condition.

The revised waste details are considered to be acceptable and compliant with LPP2 policy DMHB 11.

## **7.16 Renewable energy / Sustainability**

Policy 5.2 of the London Plan (March 2016) requires that development proposals make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: Be lean: use less energy; Be clean: supply energy efficiently; and Be green: use renewable energy.

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).

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The assessment submitted alongside this planning application is not adequate and provides no details of measures to minimise carbon dioxide emissions. The proposal is for the creation of 12 units within a new build. This is therefore a major development which triggers the requirement to deliver zero carbon housing. The energy assessment is not sufficient in its current form.

In order to ensure compliance with regional and local planning policies, it will be necessary to impose a condition requiring the submission and approval of a revised Energy Assessment. In addition, as it is not currently possible to assess if the development is policy compliant, the S106 agreement will require a contribution linked to the submission of further assessments and using the standard formula to allow the Council to capture any shortfalls. If the updated Energy Assessment indicates no shortfall, then no payment is necessary.

Subject to the imposition of the above condition and Heads of Term legal agreement, the development accords with policy 5.2 of the London Plan (2016), policy EM1 of the Local Plan Part 1 (2012) and policy DMEI 2 of the Local Plan Part 2 (2020).

## **7.17 Flooding or Drainage Issues**

Policy 5.12 of the London Plan (March 2016) requires that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development.

Policy 5.13 of the London Plan (March 2016) states that development should 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 EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated.

Policies DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

The applicant has submitted a flood risk assessment and drainage strategy (Nimbus Engineering report dated July 2019) to accompany the application. The drainage strategy confirms the approach to managing surface water on the site, including the use of permeable paving and an expanse of green roof, discharging to the surface water sewer at a rate of 0.3l/s. The drainage strategy identifies elements that are to be clarified during detailed design and therefore the details of the drainage network will be secured by condition.

Subject to the imposition of the above condition, the development is considered to accord with regional and local planning policies.

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

### **AIR QUALITY**

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 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 continued improvement of air quality, especially within the Air Quality Management Area.

The application site is located within an Air Quality focus area and is considered to be of a small scale major application therefore the Air Quality Management Officer has been consulted as part of the assessment of the scheme. Taking the comments from the Air Quality Management Officer which suggest that the proposed building should be set back from the principle highway and that pollution absorbing planting should be used along the front boundary which shall be secured by condition, the proposal is considered to be acceptable.

### **NOISE**

Policy EM 8 of the Hillingdon Local Plan Part 1 - Strategic Policies states that the Council will seek to ensure that noise levels within developments are controlled and mitigated. With regard to the above and the general design policies (DMHB 11 of the LPP2) an acoustic report has been submitted and refers to the external noise environment surrounding the proposed development. The applicant has demonstrated what the ambient noise levels surrounding the site and the level of mitigation required to achieve the standards cited in BS 8223:2014. Sound reduction requirements for the external building fabric and glazed elements of the residential units have been provided and is deemed satisfactory however the application states 12 residential units and the drawings show different uses /rooms in the adjoining residential unit on specific floors. Namely between the first floor, second floor and third floor. As such the Council's Noise Officer has recommended 2 conditions to ensure that the proposal meets the necessary noise level standards and the appropriate noise insulation between rooms is secured.

Taking the above into consideration and the inclusion of the 2 recommended conditions the application is considered to be acceptable.

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

All comments raised have been addressed within the body of this report.

#### **7.20 Planning obligations**

Policy DMCI 7 of the Local Plan : Part 2 - Development Management Policies (January 2020) sets parameters for the use of Planning Obligations and Community Infrastructure charges.

Paragraph 7.33 of the of the Local Plan : Part 2 - Development Management Policies (January 2020) states while new development can make provision for new homes, employment and leisure facilities and can improve the environment through use of renewable energy and improved landscaping, it can also place additional pressure on social and physical infrastructure and general amenity, and may require measures to be taken to remedy or mitigate such impacts.

Paragraph 7.34 states that the purpose of CIL is to provide infrastructure to support the development of an area; however, the Government has specified that there may still be site specific impact mitigation requirements without which a development should not be granted planning permission. These requirements should be dealt with by planning obligations.

Finally paragraph 7.35 states that the Council will require planning obligations where the CIL levy does not sufficiently mitigate the infrastructure impacts of new development. This may include situations in which site-specific requirements have been identified that will not be funded by CIL, or where there is floorspace that results in an intensification of use but is not CIL chargeable. In such circumstances on-site obligations or financial contributions may be sought to address site-specific impacts. CIL payments will also be collected towards the cost of Crossrail on behalf of the Mayor. The Mayor's CIL Charging Schedule specifies a rate within Hillingdon of £35 per square metre of net increase in floorspace.

Further detail is contained in the Council's Planning Obligations SPD and its CIL Charging Schedule however policy DMCI 7 of the Local Plan : Part 2 - Development Management Policies (January 2020) sets the local parameters of Planning Obligations and Community Infrastructure charges.

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 obligations sought are as follows:

1. Off-site Affordable Housing - Contribution of £150,000
2. Applicant agrees to restrict the occupiers from applying for parking permits for all on street parking control zones.



3. Employment Strategy and Construction Training Contribution - 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.
4. Carbon off-set contribution as required by an approved Energy Assessment
5. Project Management & Monitoring Fee: Project Management & Monitoring Contribution equal to 5% of the total cash contributions. Details shall be in accordance with the Council Planning Obligations Supplementary Planning Document 2014
6. S278 agreement to carry out works to facilitate a new vehicle crossover to the front, eastern end of the site to allow for the bins to be carried or wheeled out to the collection vehicle.

#### Community Infrastructure Levy (CIL)

In addition to S106 contributions the Council has adopted its own Community Infrastructure Levy (CIL) with a charge of £95 per square metre of gross internal residential floor area. This application is CIL liable with respect to new floorspace being created, and the sum calculated for this application based on the floor area proposed is £ 97,064.35

In addition to the London Borough of Hillingdon CIL, the Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 per square metre of gross internal floor area to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable with respect to new floorspace being created and the sum calculated based on the floor area proposed is £45,688.68

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

Not applicable

#### **7.22 Other Issues**

#### CONTAMINATED LAND

Policy DMEI 12: relates to the development of Land Affected by Contamination and states:

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.

With regard to the above an assessment of the Council's mapping system has been undertaken and revealed that parts of the site may be at risk of possible contamination as it

was historically used for nursery/orchyd purposes. Whilst the site has been previously developed to residential since its original land use, the contaminated land officer has stated that given the scale of development a condition pertaining to a further land contamination study to identify the potential for remaining contamination, should be undertaken.

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

### **General**

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

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

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

### **Planning Conditions**

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

### **Planning Obligations**

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

### **Equalities and Human Rights**

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

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

circumstances.

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

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

Not applicable

**10. CONCLUSION**

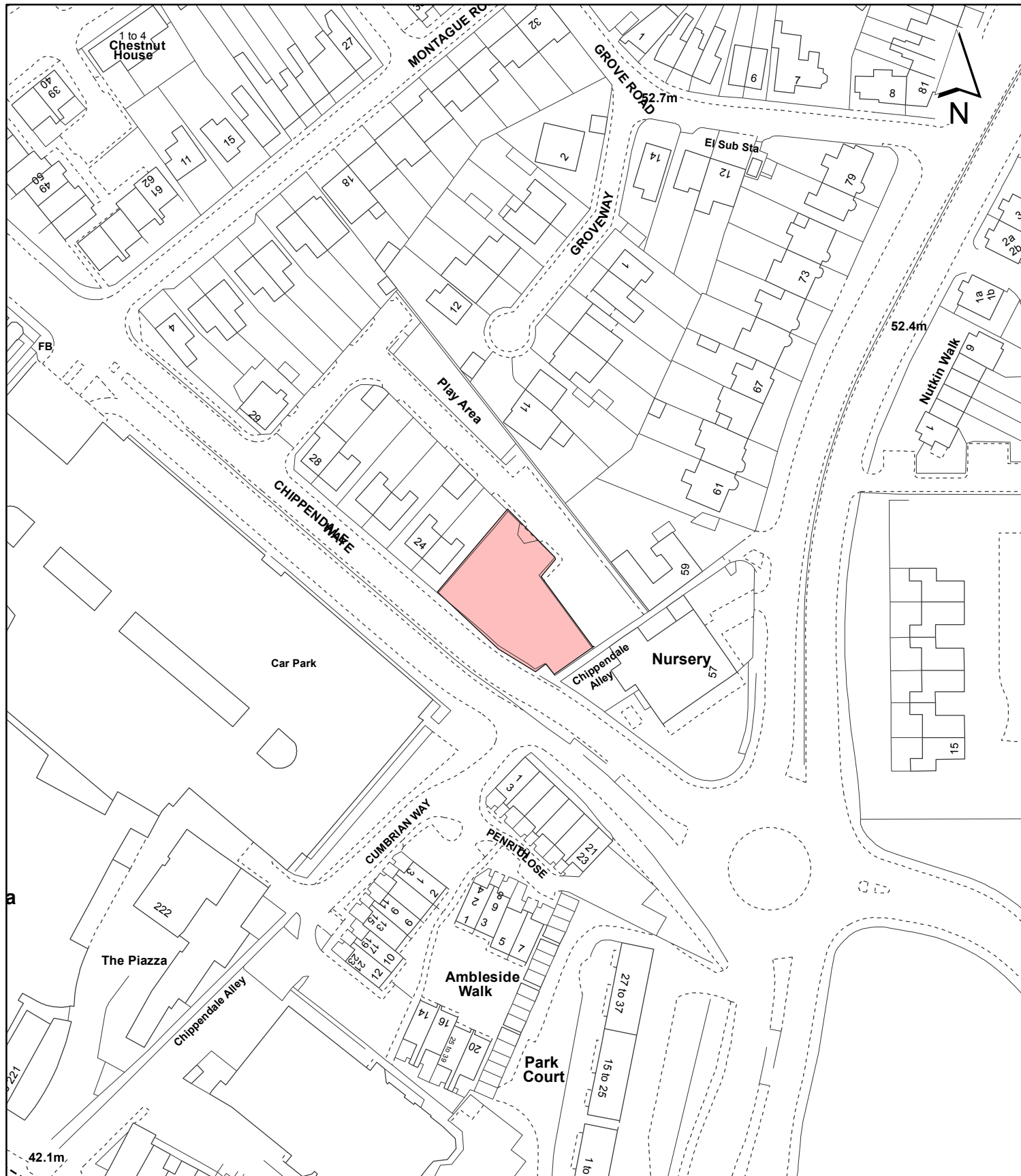
The principle of development is established through the recent consent for the construction of 4 new dwellings. The proposal to construct a larger flatted development comprising of 12 units is considered to be acceptable given the sites location on the town centre boundary and the design of the building is not considered to give rise to any significant impact to the character and appearance of the street scene or the visual amenities of surrounding properties. As such the application is recommended for approval subject to a s106 agreement pertaining the restriction of occupants applying for on street parking permits and an off-site affordable housing contribution.

**11. Reference Documents**

National Planning Policy Framework (February 2019)  
The London Plan (March 2016)  
Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)  
Accessible Hillingdon Supplementary Planning Document (September 2017)  
Planning Obligations Supplementary Planning Document (July 2014)

**Contact Officer:** Christopher Brady

**Telephone No:** 01895 250230



### Notes:

 Site boundary

For identification purposes only.

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Site Address:

**19 - 22 Chippendale Way**

Planning Application Ref:

**67544/APP/2019/1978**

Planning Committee:

**Major Page 284**

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## Report of the Head of Planning, Transportation and Regeneration

**Address** BATTLE OF BRITAIN MUSEUM AND VISITOR CENTRE WREN AVENUE  
UXBRIDGE

**Development:** Proposed landscaping improvement works including surface water flood mitigation using new rain gardens, reshaping of existing bund, new tree planting and new car park spaces with associated works

**LBH Ref Nos:** 585/APP/2019/3868

**Drawing Nos:** 2019/D295 Design & Access Statement (November 2019)  
2019/D/295/P/02 Existing Site Plan  
2019/D/295/P/03 Proposed Site Plan 1 of 2 Additional Landscaping Works  
2019/D/295/P/04 Proposed Site Plan 2 of 2 Additional Landscaping Works  
2019/D/295/P/01 Site Location Plan  
2019/2957/P Version 1 Planning Statement (November 2019)

**Date Plans Received:** 29/11/2019

**Date(s) of Amendment(s):**

**Date Application Valid:** 29/11/2019

### 1. SUMMARY

This application seeks permission for landscaping improvement works, re-shaping of the existing bund, new tree planting and new car park spaces. This is considered acceptable in principle and with regard to its impact on the Green Belt, character of the area, neighbour amenity, access, trees and landscaping, ecology, flooding, drainage, the local highway network, waste and air quality. Subject to conditions, this application is recommended for approval.

### 2. RECOMMENDATION

**APPROVAL subject to the following:**

#### 1 COM3 Time Limit

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

#### REASON

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

#### 2 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers 2019/D/295/P/02, 2019/D/295/P/03, 2019/D/295/P/04 and shall thereafter be retained/maintained for as long as the development remains in existence.

#### REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the London Plan (March 2016)

#### 3 NONSC Sustainable Water Management

Prior to commencement (excluding demolition and site clearance), a scheme for the

provision of sustainable water management showing the detail of the proposed rain gardens and drainage shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

#### REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to: Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.12 of the London Plan (March 2016) and to be handled as close to its source as possible in compliance with Policy 5.13 of the London Plan (March 2016), National Planning Policy Framework (February 2019), and the Planning Practice Guidance (March 2014).

#### **4 COM8 Tree Protection**

No site clearance or construction work shall take place until the details 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 Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **5 COM9 Landscaping (car parking & refuse/cycle storage)**

Prior to commencement of relevant works, a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. 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

NB: Landscaping plans shall include pollution absorbing and native planting species.

2. Details of Hard Landscaping
  - 2.a Refuse Storage
  - 2.b Means of enclosure/boundary treatments
  - 2.c Car Parking Layouts (to total 44 car parking spaces, 3 long bays and 3 motorcycle spaces, including demonstration that 8 car parking spaces are served by active electrical charging points, 5 Blue Badge parking spaces and 5 Brown Badge parking spaces)
  - 2.d Hard Surfacing Materials
  - 2.e External Lighting
  - 2.f Other structures (if relevant)

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 surfacing/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

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 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policies 5.10 and 5.17 of the London Plan (March 2016)

### **6 COM9 Functional Services and Levels**

No development shall take place until details of functional services and levels has been submitted to and approved in writing by the Local Planning Authority. The details shall include:-

- a) Existing and proposed functional services above and below ground
- 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 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

### **INFORMATIVES**

## **1            152            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            153            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 2 - Development Management Policies (January 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.

DMCI 2	New Community Infrastructure
DMEI 10	Water Management, Efficiency and Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 2	Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 5.10	(2016) Urban Greening
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 6.13	(2016) Parking
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 7.16	(2016) Green Belt
LPP 7.2	(2016) An inclusive environment
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development

## **3            170            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 the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), 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.



### 3. CONSIDERATIONS

#### 3.1 Site and Locality

The site comprises the Battle of Britain Museum and Visitor Centre, situated to the west of Wren Avenue. The site contains the Grade I Listed Group Operations Room and Locally Listed Group Memorial Stone. Alongside the Uniter Bunker building, these elements of the site experience surface water issues. To the west of the site is the River Pinn, subjecting part of the site to Flood Zones 2 and 3. Based on Transport for London's WebCAT planning tool, the site has the worst Public Transport Accessibility Level (PTAL) rating of 0. The site is designated as part of Green Belt land and is allocated as part of the SA 28 St Andrew's Park (former RAF UXbridge) site under the Hillingdon Local Plan: Part 2 - Site Allocations and Designations (January 2020). This is identified for high quality residential-led mixed use development, accommodating up to 1,340 homes and around 14,000 sqm of office space and a 90 bed hotel.

#### 3.2 Proposed Scheme

This application seeks permission for proposed landscaping improvement works including surface water flood mitigation using new rain gardens, reshaping of the existing bund, new tree planting to improve setting and new car park spaces. The proposal would provide an additional 14 car parking spaces, including 1 accessible parking space and 2 family parking spaces, to total 44 car parking spaces, 3 long bays and 3 motorcycle spaces.

#### 3.3 Relevant Planning History

585/ADV/2017/139      Battle Of Britain Museum And Visitor Centre Wren Avenue Uxbridge  
Erection of 18 x 6m high flag poles to hang flags such as the Hillingdon coat of arms, military or naval flags, royal cypher flags, flags produced specifically for special national events/occasional use (e.g. flags to mark royal weddings or historical military events), or any non-commercial flags which existed at the time of the Battle of Britain.

**Decision:** 20-02-2018    Approved

585/APP/2010/2902      Underground Operations Room, R A F Uxbridge Hillingdon Road Uxt  
Erection of a 2.4m high metal railing fence around historic bunker.

**Decision:** 28-01-2011    Approved

585/APP/2011/2201      The Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Repair works, alterations and enactments to fire protection to below ground bunker (Application for Listed Building Consent).

**Decision:** 04-11-2011    Approved

585/APP/2011/830      The Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Installation of one new access door into store room.

**Decision:** 20-09-2011    Approved

585/APP/2012/2303      The Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Proposed new external lighting to the WWII Bunker enclave

**Decision:** 06-11-2012    Approved

585/APP/2013/74      The Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Application for Listed Building Consent for up to 55 new signage boards within the Battle of Britain Bunker.

**Decision:** 28-02-2013    Withdrawn

585/APP/2014/3723      The Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Application for prior notification of proposed demolition for the former AUS Building (No 76) located on the RAF Uxbridge site (made under the Town and Country Planning (General Permitted Development) Order 1995 Schedule 2 Part 31)

**Decision:** 17-11-2014    PRN

585/APP/2014/3739      The Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Erection of a temporary modular building with associated works and installation of a temporary road

**Decision:** 10-12-2014    Approved

585/APP/2014/3910      The Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Erection of Battle of Britain Education and Visitor centre with exhibition space, auditorium, meeting rooms, library, cafe and shop and associated parking area and landscaping.

**Decision:** 08-01-2015    Approved

585/APP/2016/877      Battle Of Britain Bunker Hillingdon Road Uxbridge  
Non material amendment to application 585/APP/2014/3739 (Erection of a temporary modular building with associated works and installation of a temporary road) to allow for an enlargement and alterations to the temporary building proposed.

**Decision:** 11-03-2016    Approved

585/APP/2017/2413      Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge  
Non-material Amendment to planning permission ref. 585/APP/2014/3910 dated 29-01-2015 (Erection of Battle of Britain Education and Visitor centre with exhibition space, auditorium, meeting rooms, library, cafe and shop and associated parking area and landscaping) to introduce an external egress stair on the south elevation with cladding

**Decision:** 31-07-2017    Approved

585/APP/2017/4005      Battle Of Britain Museum & Visitor Centre Wren Avenue Uxbridge

Retention of existing temporary visitors centre and external redecoration.

**Decision:** 20-02-2018    Approved

585/APP/2019/297            Battle Of Britain Museum And Visitor Centre Wren Avenue Uxbridge  
Extension of existing car park.

**Decision:**

585/APP/2019/2988            Battle Of Britain Bunker, Raf Uxbridge Hillingdon Road Uxbridge

Repairs to leaking concrete intake shaft, Y1 to the lower plant room. Overhaul and clean the air shafts, their cowls and grills and adjust kerb heights to allow storm water run off and to prevent water ingress. Improve existing drainage system to direct water away from the bunker. Repair asphalt to roofs over entrance and exit and local repairs to shafts. Improve and overhaul iron door and frame to exit. Remove undergrowth and trees directly over bunker to prevent future tree root damage

**Decision:** 25-11-2019    Approved

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

None.

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

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

1.2        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)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

1.3        The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

1.4        Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

##### **Part 1 Policies:**

- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM8 (2012) Land, Water, Air and Noise

##### **Part 2 Policies:**

- DMCI 2 New Community Infrastructure
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 4 Development on the Green Belt or Metropolitan Open Land
- DMEI 9 Management of Flood Risk
- DMHB 11 Design of New Development
- DMHB 14 Trees and Landscaping

DMHB 2	Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 5.10	(2016) Urban Greening
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 6.13	(2016) Parking
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 7.16	(2016) Green Belt
LPP 7.2	(2016) An inclusive environment
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development

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

**5.1** Advertisement Expiry Date:- **1st January 2020**

**5.2** Site Notice Expiry Date:- **29th January 2020**

## **6. Consultations**

### **External Consultees**

Letters were sent to neighbouring properties, a site notice was erected and an advert was posted in the local paper. All consultations expired on the 11/01/2020. No comments have been received from residents.

### **HISTORIC ENGLAND:**

Thank you for your letter of 28 January 2020 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

### **Internal Consultees**

#### **FLOOD AND WATER MANAGEMENT OFFICER:**

These proposals will help alleviate localised surface water flood risk issues which affect the listed Bunker Structure and this application is supported subject to the final details of the rain gardens being agreed. Therefore the following condition is requested:

Prior to commencement, (excluding demolition and site clearance) a scheme for the provision of sustainable water management showing the details of the proposed rain gardens and drainage shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence. REASON To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to: Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.12 Flood Risk Management of the London Plan (March 2016) and To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), National Planning Policy Framework (February 2019), and the Planning Practice Guidance (March 2014).

#### **HIGHWAYS OFFICER:**

The proposed development would increase the number of car parking spaces on site from 30 to 44. However, these new car parking spaces are being provided to cater for occasional peaks in the existing demand for parking such as Armistice Day. Given that the new car parking spaces are being provided to cater for existing demand then there will be no impact on the free flow of traffic, road safety or residential amenity as these vehicles will already be on the local highway network. There are no highway objections to this planning application.

#### **PLANNING POLICY OFFICER:**

Designations

Green Belt

Principle of Development

The proposed development is for the extension of the public car park for the Battle of Britain Bunker Museum and Visitor Centre which opened in 2017. The Museum is currently served by 30 car parking spaces and the proposed extension would increase this to 44 spaces. The Planning Statement identifies three reasons for seeking an extension to the existing car park which include reducing overspill parking into surrounding roads at peak times, the need to address issues of surface water flooding and issues with the existing servicing arrangements. The proposed extension would be accommodated by the remodelling of an existing landscape bund.

The whole site is located within the Green Belt where development is by definition harmful unless it falls within any of the exceptions identified in para 145 of the NPPF. Part g) of para. 145 allows for limited infilling or the partial or complete development of previously developed land where this would not have a greater impact on the openness of the Green Belt. Local Plan Part 2 policy DME1 4: Development in the Green Belt on Metropolitan Open Land accords with this approach requiring that extensions or redevelopments on sites in the Green Belt should not have a greater impact on openness and provides criteria to consider including: height and bulk, proportion of the site already developed, the footprint and distribution of existing building, the relationship of the proposal with the

development on site that will be retained and the visual amenity and character of the Green Belt.

It is considered that the whole of the bunker site should be regarded as previously developed land as the current landscaping, including the bund, were provided to screen the bunker and support buildings. The proposed car park extension is considered to be infill development due to its location within the existing built footprint of the site and its relatively limited scale. In terms of the impact on openness, the additional spaces have been designed to minimise their visual impact through the use of grasscrete paving but more importantly the existing bund will be reshaped and will continue to act as visual screen to the site from surrounding areas. The overall footprint of the Museum and Visitor centre will also remain unchanged. On this basis it is considered that the proposed car park extension would not be inappropriate development in the Green Belt and very special circumstances do not need to be demonstrated.

#### TREES AND LANDSCAPING OFFICER:

This site is occupied by the existing car park and land adjacent to the Battle of Britain Visitor Centre and the Uniter Bunker, to the east of Dowding Park.

There is recently established soft landscape associated with the Visitor Centre car park and access road.

The site lies within the area covered by TPO 736.

#### COMMENT

No trees will be directly affected by the proposal, although the recently planted areas should be protected from the plant and construction-related activities.

The proposals include the removal of existing bunding and changes of level will be required to accommodate the new car spaces, circulation route and SUD's proposals.

New boundary planting with trees is welcome, subject to detail.

#### RECOMMENDATION

No objection subject to pre-commencement condition COM8 and COM9 (part 6). Other conditions should include COM9 (parts 1,2,4 and 5).

#### CONSERVATION OFFICER:

The application seeks permission to undertake landscaping improvement works including surface water flood mitigation using new rain gardens, reshaping of existing bund, new tree planting to improve setting and new car parking spaces.

The site is an irregular site within the Battle of Britain Museum and Visitor Centre complex. Development will be located in two locations; around the existing lower car park, and around the bunker entrance and is intended to support the flood mitigation works consented in the Planning Application ref: 585/APP/2019/2988 around the bunker entrance.

The proposals for the landscaping and additional car parking spaces around the Uniter Bunker will not harm the setting of the listed building as they will be set well away from the Battle of Britain Bunker with the visitor centre in between.

The improved landscaping around the Bunker entrance will help to prevent future water ingress via the main entrance steps and will reinforce the works being undertaken under application 585/APP/2019/2988.

The proposals will not harm the heritage assets and no objection is raised to the proposals.

## AIR QUALITY OFFICER:

The development is not classified as a major planning application therefore has no accompanying air quality assessment. However the highway comments have concluded that there will be no congestion arising on the surrounding road network from the 14 additional car parking spaces. In terms of air quality, the extended parking facility has enhanced the provision of active electric charging points.

## **7. MAIN PLANNING ISSUES**

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

The Battle of Britain Museum and Visitor Centre provides an exhibition hall, 95 seat auditorium, meeting rooms, a cafe and gift shop and reception area. The Use Class for the site is considered to be Use Class D1 with ancillary Use Class A1 and A3 space.

Policy CI1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 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 by:

2) Supporting the retention and enhancement of existing community facilities.

Policy DMCI 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) seeks to retain community facilities but states that proposal involving the loss of an existing community facility will be permitted if:

i) the specific use is no longer required on-site. In such circumstances, the applicant must provide evidence demonstrating that:

a) the proposal would not lead to a shortfall in provision for the specific use within the local catchment area;

b) there is either no demand for another suitable social infrastructure use on-site, or that the site/premises is no longer appropriate for social infrastructure uses; and

c) any replacement/relocated facilities for the specific use provides a level of accessibility and standard of provision at least equal to that of the existing facility.

ii) the activities carried out are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents; and

iii) the redevelopment of the site would secure an over-riding public benefit.

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

A) Proposals for the refurbishment and re-use of existing premises for community facilities will be supported.

B) Proposals for the provision of new community facilities will be supported where they:

i) are located within the community or catchment that they are intended to serve;

ii) provide buildings that are inclusive, accessible, flexible and which provide design and space standards that meet the needs of intended occupants;

iii) are sited to maximise shared use of the facility, particularly for recreational and community uses; and

iv) make provision for community access to the facilities provided.

The proposed development seeks permission for landscaping improvement works including surface water flood mitigation using new rain gardens, reshaping of the existing bund, new tree planting and new car parking spaces. The proposed tree planting will enhance the setting of the site and the proposed rain water gardens will alleviate localised surface water flood risk issues which currently affect the listed Bunker Structure. The proposal would also provide an additional 14 car parking spaces, including 1 accessible parking space and 2 family parking spaces, to total 44 car parking spaces. This is



proposed in order to address the under provision of car parking for special event days, including Armistice Day, which causes congestion along Wren Avenue. Evidently, the proposed changes support the retention and enhancement of the existing community facility, in accordance with Policy CI1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies DMCI 1 and DMCI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

The principle of the development within the Green Belt is addressed in the 'Impact on the Green Belt' section of the report.

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

Not relevant to the consideration of this application.

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

The site comprises the Grade I Listed Group Operations Room and Locally Listed Group Memorial Stone, associated with the Battle of Britain Museum and Visitor Centre.

Paragraph 192 of the National Planning Policy Framework (NPPF) (February 2019) states that in determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Policy 7.8 of the London Plan (March 2016) states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

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

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

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

B) 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 may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.

C) 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.

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

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

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

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

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

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

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

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

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

The proposed development would include landscaping to adjoin the Grade I Listed Group Operations Room and Locally Listed Group Memorial Stone. This would support flood mitigation works consented as part of planning permission reference 585/APP/2019/2988 and contribute to the alleviation of localised surface water flood risk issues which affect the listed Bunker Structure. The proposed car parking will facilitate visits to the Battle of Britain Museum and Visitor Centre which contributes to the regeneration of the statutory listed and locally listed heritage assets. As confirmed by the Council's Conservation Officer, the proposed works complement the setting of the listed structures. As such, the proposed works are considered to accord with the requirements of Policies DMHB 1, DMHB 2 and DMHB 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy 7.8 of the London Plan and the NPPF (February 2019).

#### **7.04 Airport safeguarding**

Not relevant to the consideration of this application.

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

The application site is located within Green Belt land and is subject to the following policy considerations:

Paragraph 143 of the NPPF (February 2019) sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. Paragraph 144 continues this, stating:

"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."

Paragraph 145 of the NPPF (February 2019) states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt but that exceptions to this include:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
  - not have a greater impact on the openness of the Green Belt than the existing development; or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Policy 7.16 of the London Plan (March 2016) supports this, stating:

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

In terms of local policy, the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) gives strong protection to Green Belt land. Policy EM2 states that the Council will seek to maintain the current extent of the Green Belt and any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan (March 2016) policies, including the very special circumstances test.

Policy DME1 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site; iv) the relationship of the proposal with any development on the site that is to be retained; and v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

The proposed development would extend the existing car park area, increasing the number of car parking spaces from 30 to 44. The Planning Statement identifies three reasons for seeking an extension to the existing car park which include reducing overspill parking into surrounding roads at peak times, the need to address issues of surface water flooding and issues with the existing servicing arrangements.

The whole site is located within the Green Belt where development is by definition harmful unless it falls within any of the exceptions identified in para 145 of the NPPF. As stated by the Council Planning Policy Officer, the whole of the bunker site is considered to be previously developed land as the current landscaping, including the bund, were provided to screen the bunker and associated buildings. The proposed car park extension is considered to be infill development due to its location within the existing built footprint of the site and its relatively limited scale.

In terms of the impact on the openness of the Green Belt, the true impact of the proposed development is considered to be the cars which are to occupy the additional spaces. In order to minimise any visual impact, the additional spaces are proposed to utilise grasscrete paving as a softer alternative to hardstanding and the existing bund is proposed to be regraded in order to act as visual screen to the site from surrounding areas. The proposed development is also arranged to adjoin the existing car park area and the Uniter Bunker building, thereby preventing sprawl and containing the development within a designated area. Alongside the proposed tree planting and rainwater gardens, the proposal is considered to sufficiently limit its impact on the Green Belt. On this basis, the proposed car park extension would be acceptable development within the Green Belt which would not have a greater impact on the openness of the Green Belt than the existing development. As such, very special circumstances do not need to be demonstrated and the proposal would accord with Policy DME1 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy 7.16 of the London Plan (March 2016) and the NPPF (February 2019).

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

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 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 proposed additional car parking and layout would provide sufficient space for access by visitors and service vehicles. The proposed spaces and access road are to utilise grasscrete, the existing bund is to be regraded to screen the proposed spaces and additional tree planting and rain water gardens are proposed to complement the Green Belt aesthetic as well as improve the drainage and ecological value of the site. The bin storage arrangements are proposed to remain as existing.

The existing site is notably screened by tree coverage and there are limited vantage points where the proposed parking could be viewed from. Generally, it is considered that views of the proposal are only possible within close proximity to the site on Wren Avenue and only visitors of the site would see the proposed development. As such, the impact of the proposal on the character of the area and street scene is not considered to be detrimental.

The specific detail of the materials to be used and planting proposed are to be secured by condition. Subject to condition, the proposed development would accord with the requirements of Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

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

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

The nearest neighbouring residents to the proposed development would be located over 80 metres to the east of the application site along Patch Close and Vincent Drive. Given this, the proposed development is not considered to result in any detrimental impacts on the neighbouring resident amenity, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

Not relevant to the consideration of this application.

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

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

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. 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.
- B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments 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 Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states 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 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that new development is only permitted where it is in accordance with the Council's adopted car parking standards. Appendix C of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that car parking standards are determined on an individual basis for community centres.

The proposed development would provide an additional 14 car parking spaces, including 1 accessible parking space and 2 family parking spaces, to total 44 car parking spaces, 3 long bays and 3 motorcycle spaces. These car parking spaces are proposed in order to cater for occasional peaks in the existing demand for parking which arise from events held at the Battle of Britain Museum and Visitor Centre, including Armistice Day. As stated by the Council's Highways Officer, the proposed spaces are considered to reduce the impact of these events on the local highways network.

The proposed car park layout would introduce a new looped access road allowing for appropriate access by visitors and service vehicles. As such, this layout is considered acceptable.

A total of 6 existing car parking spaces are also proposed to be fitted with active electrical charging points, in addition to the 2 which already exist on site. This is considered to encourage more sustainable transport to and from the site and is supported.

Given the above, the proposed development is considered to accord with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

Please see the 'Impact on the character & appearance of the area' section of the report.

#### **SECURITY**

Not relevant to the consideration of this application.

#### **7.12 Disabled access**

Policy 7.2 of the London Plan (March 2016) requires that the all new development provides the highest standards of accessible and inclusive design.

The proposed development includes provision for 1 additional accessible space, equating to 10% of the proposed car parking spaces. This is in addition to 4 existing accessible parking spaces and is considered to accord with Policy 7.2 of the London Plan (March 2016).

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

Not relevant to the consideration of this application.

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

#### **TREES AND LANDSCAPING**

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

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: A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The proposed development would create an area of grasscrete measuring approximately 423 square metres in footprint, the existing bank would be regraded and reinforced with new tree planting and new rain gardens would be provided to mitigate surface water issues. No trees will be directly affected by the proposal, although the recently planted areas should be protected from the plant and construction-related activities. Subject to a condition securing the detail of proposed materials, planting and tree protection measures, the proposed development is considered to accord with Policy 5.10 of the London Plan (March 2016) and Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **ECOLOGY**

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy 7.19 of the London Plan (March 2016) states that development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

The proposal includes new tree planting to reinforce the existing bund and would create rain water gardens to mitigate surface water issues. These elements also serve to enhance the ecological value of the site. The detail of the planting to be undertaken is to be secured by condition. As such, subject to condition, the proposal would accord with the requirements of the NPPF (February 2019), Policy 7.19 of the London Plan (March 2016) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **7.15 Sustainable waste management**

Policy 5.17 of the London Plan (March 2016) sets out the Mayor's spatial policy for waste management, including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling.

The proposal involves no alterations to the refuse storage facilities but would create a new looped access road suitable for refuse and service vehicle collections. As such, the proposal is not considered contrary to Policy 5.17 of the London Plan (March 2016).

#### **7.16 Renewable energy / Sustainability**

Not relevant to the consideration of this application.

#### **7.17 Flooding or Drainage Issues**

Policy 5.12 of the London Plan (March 2016) requires that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development.

Policy 5.13 of the London Plan (March 2016) states that development should 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 EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

As stated by the Council's Flood and Water Management Officer, the proposed landscaping works, rain gardens, reshaping of the existing bund and tree planting will mitigate localised surface water flood risk issues which impact on the existing heritage assets. Subject to a condition securing details of a sustainable water management scheme, the proposed development is considered to accord with Policy 5.12 and 5.13 of the London Plan (March 2016), Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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



## NOISE

Not relevant to the consideration of this application.

## AIR QUALITY

Policy 7.14 of the London Plan (March 2016) states that development proposals should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

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

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 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 application site is within a declared Air Quality Management Area which requires planning applications to consider their impact on air pollution and provide any necessary mitigation. It is not, however, within an Air Quality Focus Area where the pollution levels are predicted to be above the air quality limits.

The proposed development would provide an additional 14 car parking spaces and would install active electric car charging points to 6 existing car parking spaces, to total 8 active electric vehicle charging points on site. The site is set back from the main road which would be the major pollution source in terms of negative impacts on users of the site. The development is proposed to reduce congestion on surrounding roads and the proposed tree planting would benefit the local environment.

Given the above, it is considered that the proposal would not be contrary to Policy 7.14 of the London Plan (March 2016), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

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

No comments from residents have been received.

### **7.20 Planning obligations**

Not relevant to the consideration of this application.

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

Not relevant to the consideration of this application.

### **7.22 Other Issues**

None.

## **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**

In conclusion, the proposed landscaping improvement works, re-shaping of the existing bund, new tree planting and new car park spaces are considered acceptable in principle and with regard to its impact on the Green Belt, character of the area, neighbour amenity, access, trees and landscaping, ecology, flooding, drainage, the local highway network, waste and air quality. Subject to conditions, this application is recommended for approval.

**11. Reference Documents**

National Planning Policy Framework (February 2019)

The London Plan (March 2016)

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

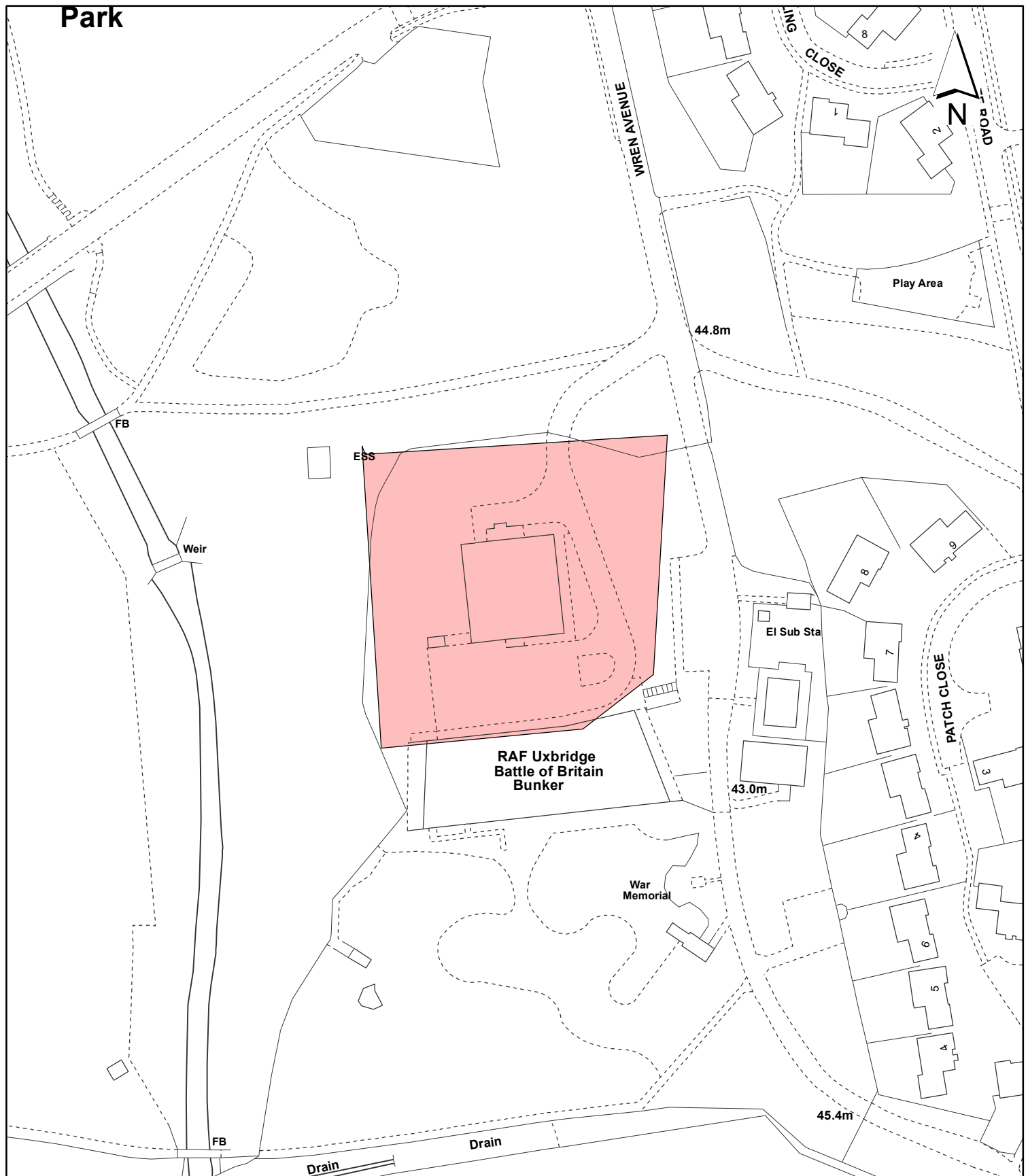
Hillingdon Local Plan: Part 2 - Site Allocations and Designations (January 2020)

Accessible Hillingdon Supplementary Planning Document (September 2017)

Planning Obligations Supplementary Planning Document (July 2014)

**Contact Officer:** Michael Briginshaw

**Telephone No:** 01895 250230



#### Notes:

 Site boundary

For identification purposes only.

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Site Address:

**Battle of Britain Museum  
and Visitor Centre  
Wren Avenue**

Planning Application Ref:

**585/APP/2019/3868**

Planning Committee:

**Major Page 308**

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## Report of the Head of Planning, Transportation and Regeneration

**Address** THE ARENA BENNETSFIELD ROAD STOCKLEY PARK  
**Development:** Alterations to car parking and erection of 2 substations storage/plant room  
**LBH Ref Nos:** 37800/APP/2019/3278  
**Drawing Nos:** URB SS [08] 09 01 D00 date received 07-02-20  
TR18 SSE  
URB-SS 08 00 01-D00  
021019 Cover Letter.

**Date Plans Received:** 04/10/2019 **Date(s) of Amendment(s):** 04/10/2019

**Date Application Valid:** 22/10/2019

### 1. SUMMARY

The application proposes alterations to the car park to facilitate the relocation of the existing electricity substation from the eastern end of the car park to the north western end. In order to facilitate the development 4 car parking spaces would need to be relocated to ensure there would be no overall loss of car parking.

The application site benefits from planning consent for the erection of 81 room hotel (Use Class C1) with ancillary bar/cafe with associated ancillary works including extension and reconfiguration of car park and landscaping. The Arena itself is located within the Stockley Park Estate and provides a leisure hub for the surrounding commercial units, comprising public house, retail, coffee shop/ sandwich bar and gymnasium uses.

The site is located within the Green Belt, additionally it is locally listed as being of historical/architectural merit and therefore has been subject to assessment against the necessary Green Belt and local heritage policies both of which the scheme is considered to comply with given its minor scale and the limited works involved.

The proposal is not considered to conflict with the Highways or Design policies set out within the Hillingdon Local Plan: Part 2 - Development Management Policies and as such the application is recommended for approval.

### 2. RECOMMENDATION

**APPROVAL** subject to the following:

#### 1 COM3 Time Limit

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

#### REASON

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

#### 2 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on Drawing Numbers 03 Rev B and URB SS [08] 09 01 D00 date received 07-02-20 and TR18 SSE

#### REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and the London Plan (2016).

### **3 NONSC Contaminated Land**

Prior to the construction of the 3 car parking spaces along the perimeter of the car park a detailed cross section which includes the dig depth in relation to the bund and the various surfacing levels used to construct the spaces shall be submitted and approved by the Local Planning Authority.

#### REASON:

To ensure the integrity of the existing protective barrier structure is maintained and compliance with DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020)

### **4 NONSC Contaminated Land**

No contaminated soils or other materials shall be imported to the site. All imported soils for engineering and/or landscaping purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to the Local Planning Authority for approval. Note: The Environmental Protection Unit (EPU) must be consulted for their advice when using this condition.

REASON: To ensure that the Business Park is not subject to any risks from contamination 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, of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020)

### **5 COM10 Tree to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the 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 BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and to comply with Section 197 of the Town and Country Planning Act 1990.

## **6 COM9 Landscaping (car parking & refuse/cycle storage)**

Within 3 months of the date of permission a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. 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 Means of enclosure/boundary treatments
- 2.c Car Parking Layouts (including demonstration that 20 %of all parking spaces are served by active and 20% passive electrical charging points)
- 2.d Hard Surfacing Materials
- 2.e External Lighting

### **3. Details of Landscape Maintenance**

- 3.a Landscape Maintenance Schedule for a minimum period of 5 years.
- 3.b Proposals for the replacement of any tree, shrub, or area of surfacing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

### **4. Schedule for Implementation**

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 BE13, BE38 and AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (2015)

## **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 Two - Development Management Policies

(2020), 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.

DMHB 11	Design of New Development
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
DMHB 14	Trees and Landscaping
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMHB 3	Locally Listed Buildings
DMEI 4	Development on the Green Belt or Metropolitan Open Land

### **3            I59            Councils Local Plan : Part 1 - Strategic Policies**

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant saved policies (referred to as policies from the Hillingdon Unitary Development Plan - Saved Policies September 2007), then London Plan Policies (2016). On the 8th November 2012 Hillingdon's Full Council agreed the adoption of the Councils Local Plan: Part 1 - Strategic Policies. Appendix 5 of this explains which saved policies from the old Unitary Development (which was subject to a direction from Secretary of State in September 2007 agreeing that the policies were 'saved') still apply for development control decisions.

## **3.            CONSIDERATIONS**

### **3.1           Site and Locality**

Stockley Arena is located to the east of Stockley Road and forms part of Stockley Park, a 47 hectare former landfill site which was successfully redeveloped into a business park in the late 1980s and now has international renown as one of the first business parks of its kind, and for the high quality architecture and strong integration of landscaping into the design.

Stockley Park Arena was designed and built in 1990 by Arup as the landmark core of Stockley Park and provides a leisure hub for the surrounding commercial units, comprising public house, retail, coffee shop/ sandwich bar and gymnasium uses. The building is predominantly two storey and has a lakeside setting, with ground levels rising to the north with the building itself partially sunk into the landscape. The building is centred upon a circular fortress like enclosure with radiating wings. Immediately to the north and west, are landscaped car parking areas, with the Stockley Golf Course and its clubhouse wrapping around the site to the north and east. To the south, the site is adjoined by the lake. Adjoining the lake to the south is the main access road and the commercial buildings beyond, surrounded by their parking areas within a landscaped setting.

The hotel is sited on the western side of the northern wing of the building, on part of the existing car park. This results in the reconfiguration of the existing car park which would encroach and on to part of the green space south of the golf course club house and north of the entrance to the Arena.



As the surrounding areas of the business park have evolved, Stockley Park Arena has stayed virtually unchanged. The building benefits from a low key design, typical of its time, set in a prominent, but, sensitive setting by the open water lake. The site is located within the Green Belt, additionally it is locally listed as being of historical/architectural merit. It also is located within an Air Quality Management Area and has a PTAL rating of 1b (very poor).

### **3.2 Proposed Scheme**

The application proposes the replace and relocation of the existing electricity substation and the addition of 1 further substation within the car park of the Arena Complex. The proposed substations would be construction side by side along the northern boundary of the car park. In order to facilitate the development 4 car parking spaces will also be relocated within the car park itself.

The proposed substations would each measure 3.1m in width, 2.8m in depth and approximately 2m in height.

### **3.3 Relevant Planning History**

37800/APP/2016/1430      The Arena Bennetsfield Road Stockley Park

Erection of 81 room hotel (Use Class C1) with ancillary bar/cafe with associated ancillary works including extension and reconfiguration of car park and landscaping.

**Decision:** 26-10-2016      Approved

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

The application site benefits from planning consent for the erection of 81 room hotel (Use Class C1) with ancillary bar/cafe with associated ancillary works including extension and reconfiguration of car park and landscaping. The Arena itself is located within the Stockley Park Estate and provides a leisure hub for the surrounding commercial units, comprising public house, retail, coffee shop/ sandwich bar and gymnasium uses.

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

London Borough of Hillingdon Development Plan (from 17 January 2020)

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

1.2      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)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

1.3      The National Planning Policy Framework (NPPF) (2019) is also a material

consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

#### Emerging Planning Policies

1.4 Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

#### Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

##### Part 1 Policies:

PT1.BE1 (2012) Built Environment

##### Part 2 Policies:

DMHB 11 Design of New Development

NPPF- 12 NPPF-12 2018 - Achieving well-designed places

NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
DMHB 14	Trees and Landscaping
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMHB 3	Locally Listed Buildings
DMEI 4	Development on the Green Belt or Metropolitan Open Land

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

**5.1** Advertisement Expiry Date:- **3rd December 2019**

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

## **6. Consultations**

### **External Consultees**

Letters were sent to neighbouring buildings and a site notice was displayed outside of the site for a period of 21 days. Both methods of consultation expired 29.11.20 and no responses were received.

### **INTERNAL CONSULTATION**

#### **SSE**

Further to the below, this email is to confirm that SSEN/SEPD have no objections to the planning proposal and are happy for it to proceed.

#### **HIGHWAY OFFICER**

Upon implementation of the works, four parking spaces will be lost and re provided throughout the site, three spaces will be located near the site access whilst the fourth space will be provided through the loss of two disabled spaces further south of the car park. Having assessed the originally consented scheme (ref, 37800/APP/2016/1430) which proposed an additional twenty parking spaces (above the existing provision), taking the total number of spaces to 160 of which 12 spaces were designated as disabled. The initial proposal indicated a loss of 2 disabled bays which would contribute further to the existing non-compliant level of disabled parking which was considered acceptable on-balance given what was the current level of of disabled parking (4) prior to the extant consent to construct the new hotel. A revised plan has been submitted demonstration the retention of the 12 DA spaces, therefore retaining what was found to be acceptable in the extant permission, as well as relocating the 4 spaces lost to accommodate the proposed substations.

#### **LANDSCAPING OFFICER**

The site was inspected on 4 February 2020 and the work is nearly complete. The most sensitive area is the two space incursion to the north of the car park entrance. Soil has already been removed and the space kerbed. At present there is only a temporary surface (which is already in use for parking). While the loss of additional areas of soft landscape is regrettable, it appears that there is sufficient soil and space around the existing trees to survive. Additional / replacement planting was previously agreed as part of the re-development of this site. A minor amendment may be required to

ensure that these newly disturbed areas are re-instated.

#### RECOMMENDATION

No objection subject to condition COM9 (parts 1,2,4 and 5) and COM10.

#### CONTAMINATED LAND OFFICER

##### 1 Summary of Comments:

The area of land on which Stockley Park was constructed was subjected to a major site remediation scheme in the 1980's. The remediation works involved mass excavation works, to the depth of clean natural strata, and the removal of many tonnes of waste materials that were deposited during historic landfilling operations.

The remediated area to the south of the Stockley Park Golf Club was separated from the non-remediated land by a clay bund structure, which acts as a physical barrier to seal the entire perimeter of the Business Park from waste materials which remain in place at locations beyond the clay bund.

I therefore recommend the following conditions to be imposed:

##### Bespoke condition:

Submission and implementation of a scheme of works to maintain the integrity of the existing protective barrier

No works shall commence to form the proposed two new parking spaces, in the north western area of the existing Arena car park, until a detailed scheme of works is submitted to and approved in writing by the Local Planning Authority. The scheme will have full details of:

1. How preliminary investigations are to be conducted to determine if the clay bund is present at the precise location of proposed works, and;
2. How the preparatory ground works, including reinstatement and restoration works would be undertaken.

Following approval, such scheme of works shall be implemented on site in full accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

REASON: to ensure the integrity of the existing protective barrier structure is maintained.

##### Imported Materials Condition

No contaminated soils or other materials shall be imported to the site. All imported soils for engineering and/or landscaping purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to the Local Planning Authority for approval. Note: The Environmental Protection Unit (EPU) must be consulted for their advice when using this condition.

REASON: To ensure that the Business Park is not subject to any risks from contamination 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.

2 Reason for Refusal (if objecting):

N/A

3 Observations:

According to mapping records the proposed locations of 2 new parking spaces, within the northwest section of the Arena car park, appear to coincide with the position of part of the clay bund which surrounds the entire perimeter of the business park.

Due to the importance of the bunds' role as an effective barrier, it necessarily follows that the structure should not be disturbed, because any damage would likely severely compromise the general function and performance of the clay materials which serve to isolate the business park from off-site mobile contaminants including any migrating leachate and/or landfill gas, which would otherwise easily enter the business park.

OFFICER COMMENT:

Following correspondence with the agent and after undertaking a site visit it is clear that work has been carried out in the area for which the clay bund is within a close distance. This work has been undertaken to construct what appears to be a temporary parking area however this surface is based on metal sheeting therefore not suitable for permanent parking bays. This has been discussed with the Contaminated Land Officer who stated it is unlikely that the dig depth would be low enough to disturb the bund and that a cross section of the dig depth, bund position and surfacing for the car parking spaces should be submitted.

## **7. MAIN PLANNING ISSUES**

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

The proposed application seeks full planning consent for the relocation of the existing substation and addition of 1 further substation within the car park of the Arena Complex. The site has been subject to planning consent for a new hotel and following this consent and recent updates to fire safety policy the proposed works are necessary to facilitate the construction of the hotel. 4 car parking spaces required to facilitate the construction of the substations are to be relocated to therefore there is no loss of parking.

Section 7.05 considers the proposed development against Green Belt planning policies.

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

Not applicable

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

The application site is located within what is considered the setting of a Locally Listed building therefore Policy DMHB 3 is relevant to the assessment of the proposal. The policy provides three key points for which a proposal should adhere to however section A) is the only relevant point given that the proposal is not for alterations to the Listed Building itself. Point 'A)' states that there is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications,

The proposed location of the new substations would be set further away from the locally listed building than the existing substation and is therefore considered to be an improvement to the setting of the locally listed building.

### **7.04 Airport safeguarding**

Not applicable

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

At national level the NPPF provides guidance on what is acceptable or not in the Green Belt and this is reflected below for clarity. Construction of new buildings, change of use or development on land in the Metropolitan Green Belt is inappropriate development unless it is for the following purposes:

- provision of appropriate facilities for agriculture, forestry, outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided that the new building is in the same use and not materially larger than the one it replaces; and
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

At local level policy DMEI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (Jan 2020) states that :

A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special exceptional circumstances.

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

With regard to the above the proposed development is considered to comply with more than one of the aforementioned NPPF exceptions given that the substations would be constructed within the confines and previously developed piece of Green Belt Land and is of very small scale. Similarly the proposal is considered to comply with those exceptional circumstances stated within Policy DMEI 4 and as such is considered to be acceptable.

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

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also sets out principles for good design and how the design of new development should relate to the existing street scene.

Stockley Park was laid out in 1985 to a master plan by Arup Associates, it is an early example of a business park and is characterised by large streamlined modern office buildings, many by well known architects and architectural practises, set in an open and well designed landscaped setting. The Arena was also designed by Arup Associates, it includes a sports club, restaurant, management offices and conference centre, and provides a long, low focus between the park and business area. It is faced in coursed buff

reconstituted stone and timber, and has a polygonal conservatory to the west. At its centre is an unusual circular piazza with a distinctive roof line with wings radiating from the space that relate to the surrounding ground levels and partially enclose the car park. The sports centre has a very simple blank facade and barrel roof form when viewed from the car park. The grassed slopes and mounding screen it from the golf course to the east. To the south, the building has a simple fortress like character, it is accessed via a bridge over a lake that sweeps along its southern boundary and has a moat like quality.

The Arena building is included in the Council's Local List of Buildings of architectural or historic interest.

The proposal for 2 electricity substations which are set further away from the buildings than the existing is welcomed given the historic interest in the buildings. The substations would be located within the car park and far enough away from the buildings so that they would not hinder their setting. The substations would be constructed of green steel with encapsulated timber battens within the roof structure and explosion relief brackets all of which are commonly used for these types of development. As such the proposal is not considered to have a negative impact on the character and appearance of the street scene.

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

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) sets out specific design standards which not only ensure high quality design but also aim to ensure that the amenities of neighbouring properties are protected.

The nearest residential properties to the site are located over 500m from the development. Therefore, given the scale and nature of the development, the proposal would not be considered to raise concern with regards to residential amenity.

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

Not applicable

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

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) relate to junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that new development is only permitted where it is in accordance with the Council's adopted car parking standards.

The application proposes the relocation of the existing and 1 additional substation which is required to serve the Arena Complex. Numerous locations were reviewed however the applicant has stated that the car parking is the only possible solution for which the provider could agree would be policy compliant. The scheme proposes the relocation of 4 parking spaces in order to facilitate the development, 2 of which are disability spaces.

The application is linked to the planning consent (ref; 37800/APP/2016/1430) for the erection of 81 room hotel (Use Class C1) with ancillary bar/cafe with associated ancillary works including extension and reconfiguration of car park and landscaping. In relation to parking the case officer states in this report " The Arena car park currently provides 140 dedicated surface car parking spaces. Due to the coincidence of peak parking demand periods for the health club and the proposed hotel, the car park will be extended to provide an additional 20 parking spaces."

The proposal does not seek to alter the total number of car parking spaces provided and proposes to retain the 12 disabled spaces which were secured under the extant consent to construct the new hotel. Prior to the approved hotel scheme there were only four disabled spaces on site. This was increased to 12 as part of the hotel scheme as the layout suited this level of provision and therefore the proposed level of parking is considered to be acceptable.

As such the proposal is considered to comply with Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that new development is only permitted where it is in accordance with the Council's adopted car parking standards.

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

Whilst the proposed development falls within the setting of a Locally Listed Building it is of a minor scale and therefore is not considered to give rise to any additional negative impacts to Locally Listed Building or its setting.

#### **7.12 Disabled access**

Not applicable

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

Not applicable

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

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

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: A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

With regard to the above the proposed development would require the relocation of 4 existing car parking spaces to the outer borders of the car park which would effectively eat in to part of the soft landscaping which forms the boundary treatment for the car park and its access. As stated by the Landscapes Officer, the most sensitive area is the two space incursion to the north of the car park entrance given its close proximity to the trees which also lie within this area. Whilst the loss of this and the other additional areas of soft landscape is regrettable, it appears that there is sufficient soil and space around the existing trees to survive. Additional / replacement planting was previously agreed as part of the re-development of this site.

As such the proposed scheme is considered to comply with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

#### **7.15 Sustainable waste management**

Not applicable

#### **7.16 Renewable energy / Sustainability**



- Not applicable
- 7.17 Flooding or Drainage Issues**
- Not applicable
- 7.18 Noise or Air Quality Issues**
- Not applicable
- 7.19 Comments on Public Consultations**
- See external consultation section of this report
- 7.20 Planning obligations**
- Not applicable
- 7.21 Expediency of enforcement action**
- Not applicable
- 7.22 Other Issues**

#### CONTAMINATED LAND

Policy DMEI 12: relates to the development of Land Affected by Contamination and states:

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.

The area of land on which Stockley Park was constructed was subjected to a major site remediation scheme in the 1980's. The remediation works involved mass excavation works, to the depth of clean natural strata, and the removal of many tonnes of waste materials that were deposited during historic landfilling operations. The remediated area to the south of the Stockley Park Golf Club was separated from the non-remediated land by a clay bund structure, which acts as a physical barrier to seal the entire perimeter of the Business Park from waste materials which remain in place at locations beyond the clay bund. According to mapping records the proposed locations of 3 new parking spaces, within the northwest section of the Arena car park, appear to coincide with the position of part of the clay bund which surrounds the entire perimeter of the business park although it is unlikely that the spaces would require excavation near to the bund itself. It is noted that the area appears to have been used to construct a temporary parking surface without disturbing the bund however in order to ensure that any further excavation carried out to construct the permanent spaces does not interact with the bund a condition has been included which will require further details of the dig depth required to facilitate the construction of the parking spaces.

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

### General

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

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

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

### Planning Conditions

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

### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

### Equalities and Human Rights

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

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

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

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

Not applicable

**10. CONCLUSION**

The application proposes the replace and relocation of the existing electricity substation and the addition of 1 further substation within the car park of the Arena Complex. The proposed substations would be construction side by side along the northern boundary of the car park. In order to facilitate the development 4 car parking spaces will also be relocated within the car park itself.

The proposal is considered to comply with the necessary National, Regional and Local policies and is therefore recommended for Approval.

**11. Reference Documents**

National Planning Policy Framework (February 2019)

The London Plan (March 2016)

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

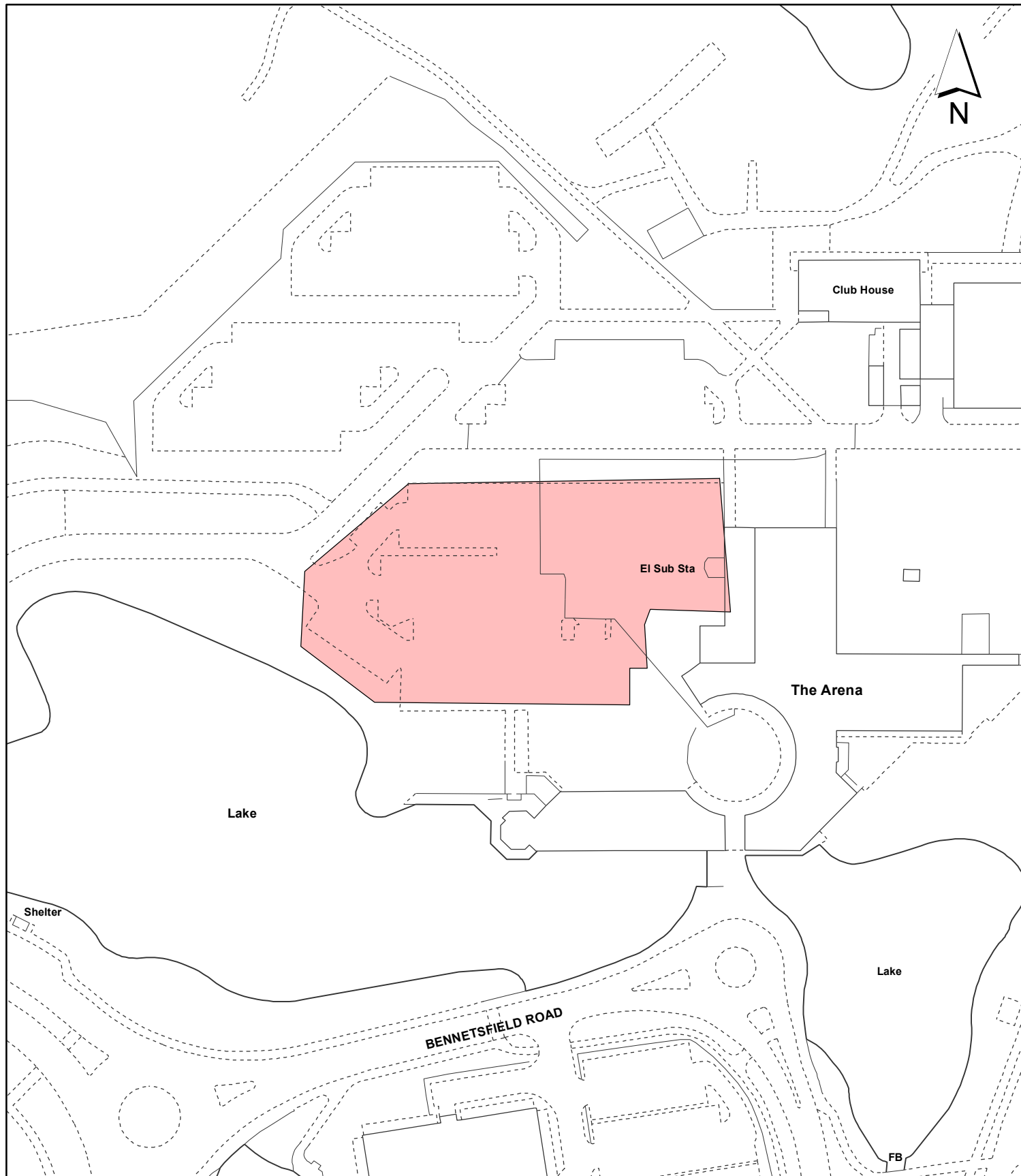
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

Accessible Hillingdon Supplementary Planning Document (September 2017)

Planning Obligations Supplementary Planning Document (July 2014)

**Contact Officer:** Christopher Brady

**Telephone No:** 01895 250230



# Notes:

 Site boundary

For identification purposes only.

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Site Address:

**The Arena  
Bennetsfield Road  
Stockley Park**

Planning Application Ref:

**37800/APP/2019/3278**

Planning Committee:

**Major Page 324**

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## Report of the Head of Planning, Transportation and Regeneration

**Address** UXBRIDGE MORTUARY KINGSTON LANE HILLINGDON

**Development:** Proposed two single storey side and rear extension to existing Mortuary Building, relocation of existing rooftop plant, new rooftop plant, shielding housing for rooftop plant, installation of roof canopy, installation of 1100mm high safety railing to the rooftop, relocation of the fence and associated works.

**LBH Ref Nos:** 13102/APP/2019/3950

**Drawing Nos:** T Taylor, via email  
M9805-HUN-DR-02-0001-SiteLocationPlan Rev. XE  
M9805-HUN-DR-02-0003-ExistingPlan Rev. XE  
TH2270 Arboricultural Impact Assessment, Method Statement & Tree Protection Plan 30th January 2020  
M9805-HUN-DR-02-0004-ExistingElevations Rev. XE  
M9805-HUN-DR-02-0005-ProposedSitePlan Rev. XE  
M9805-HUN-DR-02-0010 Rev. XE  
M9805-HUN-DR-02-0030 Rev. XE  
M9805-HUN-DR-02-0031 Rev. XE  
Drawing Register and Issue Sheet  
M9805-HUN-RP-02-0002-XE  
M9805-HUN-DR-02-0020 Rev. XE

**Date Plans Received:** 09/12/2019

**Date(s) of Amendment(s):** 31/01/2020

**Date Application Valid:** 13/12/2019

### 1. SUMMARY

This application seeks planning permission to erect two single storey side and rear extensions to the existing Mortuary Building, relocation of existing rooftop plant, new rooftop plant, shielding housing for rooftop plant, installation of roof canopy, installation of 1100mm high safety railing to the rooftop, relocation of the fence and associated works.

The application site is located within the Metropolitan Green Belt and proposed extensions to an existing building would fall under the exception of the NPPF (2019), Paragraph 145, part b. It is recognised that the Uxbridge Mortuary is considered as an ancillary facility to the adjacent cemetery which conducts post-mortem examination on behalf of Her Majesty's Coroner for West London, providing storage, examination, retention and disposal of the deceased for both Hillingdon and Ealing Boroughs. However, it has been evident that for the past 4-5 years, population growth has impacted on the overall function of the mortuary building, resulting in the need for additional space. This has subsequently resulted in delays conducting post mortem examinations and the resultant distress this causes for families.

In addition, the conditions proposed as part of this application seek to secure an uplift in tree planting to offset the removal of 7 existing trees that are proposed to be removed.

The proposal is considered to accord with the NPPF (2019) and Policy DME1 4 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

This application is recommended for approval, subject to the expiration of the public consultation, and no new issues, not considered within this report being raised.

## **2. RECOMMENDATION**

**That delegated authority be given to the Head of Planning, Transportation and Regeneration to Approve planning permission, after the expiry of the consultation period (20th Feb 2020) and no new or substantive comments having been received on the proposals.**

### **1 SP01 Council Application Standard Paragraph**

This authority is given by the issuing of this notice under Regulation 3 of the Town and Country Planning General Regulations 1992 and shall enure only for the benefit of the Council.

### **2 COM3 Time Limit**

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

### **REASON**

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

### **3 COM4 Accordance with Approved Plans**

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

TH2270 Arboricultural Impact Assessment, Method Statement & Tree Protection Plan  
30th January 2020

M9805-HUN-DR-02-0020 Rev. XG

M9805-HUN-DR-02-0010 Rev. XE

M9805-HUN-DR-02-0030 Rev. XB

M9805-HUN-DR-02-0031 Rev. XC

M9805-HUN-RP-02-0002-XC

M9805-HUN-DR-02-0004-Existing Elevations Rev. XD

M9805-HUN-DR-02-0003-Existing Plan Rev. XD

M9805-HUN-DR-02-0001-Site Location Plan Rev. XD

M9805-HUN-DR-02-0005-Proposed Site Plan Rev. XE

and shall thereafter be retained/maintained for as long as the development remains in existence.

### **REASON**

To ensure the development complies with the provisions of The Local Plan: Part 2 - Development Management Policies (2020).

### **4 COM9 Landscaping (car parking & refuse/cycle storage)**

No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. 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

1.d Schedule of works to deliver 15 replacement trees on land within the control of the applicant within the vicinity of the site.

2. Details of Hard Landscaping

2.a Means of enclosure/boundary treatments

2.b Hard Surfacing Materials

2.c External Lighting

3. Details of Landscape Maintenance

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

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

4. Schedule for Implementation

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 and DMT 6 of The Local Plan: Part 2 - Development Management Policies (2020) and The London Plan - Consolidated With Alterations (2016).

**5 COM10 Tree to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the 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 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 Two (Jan 2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

## **6 NONSC External noise from machinery, extract/ventilation ducting**

The external noise level emitted from plant, machinery/ equipment will be lower than the lowest existing background noise level by at least 10 dBA, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with the machinery operating at maximum capacity.

### **REASON**

To safeguard the amenity of the surrounding area in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (Jan 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 Hillingdon Local Plan 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.

DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMHB 11	Design of New Development
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 7.16	(2016) Green Belt
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 2	NPPF-2 2018 - Achieving sustainable development

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

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

### **4**

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.



### **3. CONSIDERATIONS**

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

The application site is a single storey building with on-site car parking to the front. The existing building comprises of a combination of brick and render exterior with flat roofs. The site is enclosed with an existing security fence around the boundary of the site. Access to the site, pedestrian or vehicular, is only permitted with authorisation.

The site is located to the east of Kingston Lane. Towards the west of the site, is the campus of Brunel University and on the immediate north and east is Hillingdon cemetery. On the south side is the Brunel University Playing Fields. Landscaping is present along the site boundary adjoining neighbouring properties. The nearest residential dwelling is approximately 65m away north-west to the site. In general, the nature of the site is quite isolated, enclosed and unique as it is located in close proximity to Hillingdon Hospital and cemetery.

The site is located within an Air Quality Management Area and the Green Belt.

#### **3.2 Proposed Scheme**

The proposed scheme of the development includes:

- Erecting two single storey side and rear extension to existing Mortuary Building
- Installation of an additional new rooftop plant
- Relocation of existing front rooftop plant to the central/rear rooftop
- Installation of two 2.4m high shielding house to screen the rooftop plant
- Installation of roof canopy to the Entrance (Bodies)
- Installation of 1.1m high safety railing to the rooftop
- Relocation of the north side of the fence line by 2.5m and change into hard standing area
- Removal of 7 trees (2 of which are already dying/dead)
- Planting of 4 new trees and pre-grown hedges along the existing green palisade fencing to the front elevation

The new extensions are proposed in grey brick, grey windows and door frames. The existing building is currently 252.7sqm in size and the proposed extension will increase the overall floor space to 403.2sqm, which equates to a 60% increase of the existing footprint.

The mortuary currently conducts post-mortem examination services for the London Boroughs of Hillingdon and Ealing. The purpose of the extension is to create a training facility and a negative pressure post-mortem room for contaminated bodies. The need for the extension is due to the increasing population of West London leading to the increase demand, storage space and post-mortem examination services required.

At the time of the officer's site visit, a shipping container was located to the north side of the building to provide additional storage because of the constraints that exist with the existing building.

The applicant has submitted a statement concerning the need for the proposed. This states that the number of cases that have come into the care of the mortuary from the London Boroughs of Ealing and Hillingdon has risen consistently over the last 4-5 years and during this time in addition to the permanent capacity the service as supplemented

storage by hiring temporary units at a significant cost to the council.

Due to the additional temporary refrigeration, the service no longer has a viewing suite for families to attend and view their loved one. The proposed extension will provide a dedicated facility to meet this need, affording families a final opportunity to say goodbye. The additional space from building the extension will increase our capacity from 40 to 75 which will include obese spaces and the option of accepting baeriatric cases which currently need to be sent offsite, at an additional cost to the council.

An increase in the size of the post mortem suite increases our capability of performing post mortems on a daily basis to ensure cases are expedited and returned to their families as soon as possible which is especially important in some religions. The increased space will also include a separate area for high risk cases which there is currently no provision for in this Borough.

The service also facilitates forensic post-mortems on behalf of the West London Coroner and Metropolitan Police Service, under the Police and Criminal Evidence Act 1984. Currently examinations are scheduled around routine post-mortems. The extension will ensure that both forensic and routine cases can be expedited simultaneously due to the addition of a separate post-mortem suite.

All Anatomical Pathology Technologists based in both public and hospital mortuaries need to complete a level 3 Diploma in Anatomical Pathology Technology, awarded by the Royal Institute of Public Health, currently this training is only on offer in the North of the country and is classroom based. The additional space at Uxbridge Mortuary will allow us to conduct training on site which can be a mixture of classroom based and practical training, which is currently not offered elsewhere. The service will also be able to offer training for our colleagues within the Police, Ambulance and fire services, which we have been inundated with requests for.

### 3.3 Relevant Planning History

13102/A/83/1024                      The Mortuary Kingston Lane Hillingdon

Erection of a concrete store shed for storing materials and cleaning equipment

**Decision:** 05-08-1983    ADH

13102/APP/2007/3025              Kingston Lane Hillingdon Adjacent To Hillingdon And Uxbridge Ceme  
CONSTRUCTION OF A NEW BUS LAY-BY FACILITY.

**Decision:** 04-01-2008    Approved

13102/APP/2013/103              The Mortuary Kingston Lane Hillingdon

Single storey side extension to the mortuary building

**Decision:** 15-05-2013    Approved

13102/B/94/1869                      The Mortuary Kingston Lane Hillingdon

Erection of front and rear extensions (involving part demolition of existing building)

**Decision:** 26-05-1995    Approved

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

A application under planning reference 13102/APP/2013/103 was granted on 28-05-13 for a single storey side extension to the mortuary building. This application has since expired and the building works were not undertaken.

A application under planning reference 13102/APP/2007/3025 was granted on 4-01-08 for the construction of a new bus lay-by facility.

A application under planning reference 13102/B/94/1869 was granted on 26-05-95 for the erection of front and rear extensions (involving part demolition of existing building).

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

London Borough of Hillingdon Development Plan (from 17 January 2020)

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

1.2 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)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

1.3 The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

1.4 Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated

Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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

The following UDP Policies are considered relevant to the application:-

#### **Part 1 Policies:**

- PT1.BE1 (2012) Built Environment
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM8 (2012) Land, Water, Air and Noise

#### **Part 2 Policies:**

- DMEI 4 Development on the Green Belt or Metropolitan Open Land
- DMHB 11 Design of New Development
- DMT 2 Highways Impacts
- DMT 6 Vehicle Parking
- LPP 7.16 (2016) Green Belt
- NPPF- 13 NPPF-13 2018 - Protecting Green Belt land
- NPPF- 2 NPPF-2 2018 - Achieving sustainable development

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

**5.1 Advertisement Expiry Date:- 10th January 2020**

**5.2 Site Notice Expiry Date:- 10th January 2020**

### **6. Consultations**

#### **External Consultees**

A public notice was displayed and expired on 10/1/20. A total of 7 neighbouring occupiers were also notified by letter. The development proposals were also advertised by way of a press notice.

Following the receipt of revised plans in February 2020, which included an alteration to the red line/site boundary, a reconsultation was undertaken. This consultation period does not expire until

the 20th February 2020 which is the day after this planning committee meeting. Therefore the recommendation on this report seeks only to authorise permission to be issued if no new issues arise from the current consultation period.

An update will be provided via the addendum of any new comments received following publication of this report.

To date, no comments of support or objection have been received on this application.

### **Internal Consultees**

#### **POLICY OFFICER**

Original Comments - Designations; Green Belt

#### **Principle of Development**

The proposed development is for the extension of the existing Uxbridge Mortuary. The mortuary is located within the Green Belt.

#### **Green Belt**

The National Planning Policy Framework (NPPF) attaches great importance to the Green Belt. 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. The NPPF states that once Green Belt boundaries have been defined and local planning authorities are required to positively enhance the beneficial use of the Green Belt.

Paragraph 145 of the NPPF (2019) notes a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it meets one of the exceptions. Part c) of paragraph 145 allows for the extension or alteration of a building provided that it does result in disproportionate additions over and above the size of the original building and Part g) allows for limited infilling of previously developed land.

Policy EM2 of the Local Plan: Part One (November 2012) notes that any proposals for development in the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

Policy DMEI 4 of the Local Plan: Part Two (2020) notes inappropriate development in the Green Belt will not be permitted unless there are very exceptional circumstances. Extensions and redevelopment of sites will also only be permitted where this would not have a greater impact on the openness of the Green Belt as well as the purposes of including land within it having regard to height and bulk, the proportion of the site that is already developed, the foot, distribution and character of the existing buildings on sites, the relationship of the proposal with any development on the site that is to be retained and the visual amenity and character of the Green Belt.

It would appear that proposed extensions have the potential to be assessed as exceptions to Green Belt policy based on the scale of the proposed extensions. Paragraph 145 c) of the NPPF creates an exception for extensions that do not result in 'disproportionate additions over and above the size of the original building'. An assessment should therefore be made of whether the proposed extension would fall in this exception using the criteria set out in Local Plan policy DMEI 4.

Where the extensions assessed as not falling within in exception c) then exception g) should also be considered as this allows for limited infilling of previously developed. Given that the site is a well bounded and distinguishable from surrounding Green Belt as a developed site this it is likely that the land for the extension should be identified as previously developed especially if there is evidence of existing hard standing.

If the proposed extensions are assessed as falling within either of these exceptions then the applicant is not required to demonstrate very special circumstances. If the proposed extensions are not considered to be exceptions then very special circumstances would then need to be demonstrated and this evidence should be requested from the applicant.

Additional Comments - Further to previous policy comments it has been identified that the existing mortuary is located within, and forms part of, Uxbridge Cemetery. Paragraph 145 b) of the NPPF identifies that the provision of appropriate facilities in connection with the use of land for cemeteries (amongst other uses) may not be inappropriate development provided that the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Although the Mortuary serves a sub-regional purpose, there is considered to be a link to the wider use of the site as cemetery which allows it to be identified as an appropriate facility under para 145 b).

#### ACCESS OFFICER:

I have considered the detail of this planning application and deem there to be no accessibility issues raised by the proposal at this Development Control stage. However, the following informative should be attached to any grant of planning permission: The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

#### HIGHWAYS OFFICER:

The application site is located on the eastern side of Kingston Lane within an area of Green Belt. It is bordered to the north-east by Uxbridge Cemetery and to the south-east by a playing field. Brunel University is located on the western side of Kingston Lane.

In planning terms, Mortuaries are considered as Sui-Generis (SG) and the proposal is for a replacement build of marginally larger scale with retention of the frontage layout in terms of access and parking quantum arrangements.

Traditionally this type of SG use exhibits a relatively dormant vehicular and pedestrian use profile reinforced by the fact that there is no documented evidence to suggest otherwise at this or other comparable sites. On this basis and the fact that the parking quantum and access arrangements on the frontage are to remain unaltered, there are no envisaged issues arising from the proposed larger scale build.

It would however be prudent to apply a 'Construction Logistics Plan' given the constraints and sensitivities of the local road network and proximity of Brunel University in order to avoid/minimise potential detriment to the public realm. It will need to be secured under a suitable planning condition.

#### Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any highway safety concerns, in accordance with Policies AM2, AM7 and AM14 of the Development Plan (2012) and emerging Local Plan Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan (2016).

#### CONSERVATION AND DESIGN OFFICER

Taking into account the location and nature of the proposal we have comments to make in this

instance.

#### TREES/LANDSCAPE OFFICER

This site is occupied by Hillindon's mortuary, located to the east of Kingston Lane between Hillindon's cemetery and Brunel University. The site is surrounded by galvanised palisade (security) fencing. The existing mortuary building is situated towards the back of the site and is serviced by a car park / circulation area and soft landscape (trees and grass) to the south and west boundaries. Off-site the setting is enhanced by the mature tree cover within the adjacent cemetery, on the east and north boundaries. There are no TPO's affecting the site (because all of the trees are on Council land) and no Conservation Area designations affecting the site. The plot lies within the Green Belt, a designation which restricts inappropriate development and urban sprawl.

A tree report by Trevor Heaps was prepared after the current proposal was designed. It therefore fails to comply with BS5837:2012, which emphasises that the tree survey should be prepared in advance and used to inform the design and site layout. The report has identified and assessed 29 individual trees and groups which may influence, or be influenced by, the development. Approximately half of these trees are situated within the site, with the other half situated within the cemetery. There are five 'A' grade trees, 12 'B' grade, 10 'C' grade with the remainder 'U' grade. 'A' grade trees are exceptional and both 'A' and 'B' grade trees are considered to be worthy of retention on development sites.

In this case, three 'A' grade trees will be removed from the site to facilitate the development (T2, T22 and T23) together with two 'B' grade trees (T4 and T11). A large number of trees both on, and off, site are likely to be affected by soil compaction, encroachment into root protection areas or underground services (see Table 1).

By way of mitigation, the report provides a detailed Method Statement and confirms that arboricultural supervision will take place during the construction phase (section 12) to ensure that tree protection measures are adhered to. Hunters' layout plan indicates the planting locations of four replacement trees, one of which is under the canopy of a retained tree and should be discounted. The tree report identifies that off-site planting would also be possible within the cemetery in order to provide succession and replacement planting.

Due to the exceptional quality of the trees to be lost to the development it is recommended that the off-site provision should be enhanced to provide at least three new trees for each tree lost.

If you are minded to approve this application, landscape conditions should include COM4, COM9 (parts 1,2,4 and 5) and COM10. The project should also provide a capital sum for off-site planting which could be managed by the Council's tree officer.

#### NOISE OFFICER:

I think it will be ok to condition the actual unit, as that is what it will need in order to have approval. The plans show it as external roof top plant. Kindly apply the following condition.

1.External noise from machinery, extract/ventilation ducting, mechanical gates,etc.

Condition: The external noise level emitted from plant, machinery/ equipment will be lower than the lowest existing background noise level by at least 5dBA, by 10 dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with the machinery operating at maximum capacity.

REASON: To safeguard the amenity of the surrounding area in accordance with Policy EM8 of The Local Plan: Part 1 - Strategic Policies (2012).

## **7. MAIN PLANNING ISSUES**

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

The property is a mortuary located adjacent to the Hillingdon cemetery and is 0.5 miles from Hillingdon Hospital. This application proposes an extension to the existing building within the Green Belt. Putting aside matters relating to the Green Belt, the proposed use of the extensions would be the same as the existing mortuary building, therefore there is no objection to the proposed use of the building as it currently exists on site.

The issues relating to the Green Belt are discussed in full in Section 7.05; 'Impact on the Green Belt'.

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

Not applicable to this application.

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

Not applicable to this application, the site is not located within a Conservation Area or an ASLC and there are no listed buildings within the vicinity of the site.

### **7.04 Airport safeguarding**

Not applicable to this application.

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

Paragraph 145 of the National Planning Policy Framework (2019) states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
  - not have a greater impact on the openness of the Green Belt than the existing development; or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Policy 7.16 of The London Plan (2016) states that inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Policy DMEI 4 of The Local Plan: Part 2 - Development Management Policies (2020) states that A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very exceptional circumstances, B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and



Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to: i) the height and bulk of the existing building on the site; ii) the proportion of the site that is already developed; iii) the footprint, distribution and character of the existing buildings on the site; iv) the relationship of the proposal with any development on the site that is to be retained; and v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

This application proposes to erect two single storey extensions to the existing building for the purpose of increasing the capacity of the mortuary, create a training facility and to establish a negative pressure post-mortem room for contaminated bodies.

In order to facilitate this development, the fence line on the northern end of the property was relocated by 2.5m. The proposed side extension to the north will increase the width of the building by 4.8m towards the front and 7m to the rear to accommodate the entrance for deliveries. The total area of the north extension is 94.7sqm. The rear side extension is located on the south side of the building and will increase the width by 2.6m, however, a large portion of this extension will not be visible from the front elevation but rather hidden towards the rear of the building behind the existing office/chapel/viewing area. The south extension's total floor space is 55.8sqm. To conceal the appearance of the proposed rooftop plants, two 2.4m high shielding house will be installed on both the central and lower rear rooftop and 1.1m high safety railing will be fixed around the perimeter of the entire rooftop. Although when viewed from the street scene, the side and rear extension will appear partially screened from the hedging proposed along the front gate, the overall size and bulk of the development will remain visible due to the existing topography of the land.

As it is recognised in the planning history, there are records that the site has previously been extended. With the additional 60% increase in floorspace as a result of the extension of the building, the development is considered to result in disproportionate additions over and above the size of the original building, which is contrary to the exception set out in the NPPF Para 145(c).

The construction of new buildings is deemed to be inappropriate in the Green Belt with the exceptions of limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development. Although the application site is enclosed and constrained, as a result of the proposed works, the existing fence line would be extended onto the adjacent cemetery land. The new footprint of the mortuary building would be located on land in which there were previously no development. As such, this development would be considered contrary to the exception set out in the NPPF Para 145(g).

However, under the exception of Para 145(b), the NPPF states that the provision of appropriate facilities (in connection with the existing use of land) for cemeteries and burial grounds and allotments: as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. For the purposes of the NPPF, the mortuary is considered an ancillary to the Uxbridge Cemetery, as it is a necessary facility that provides the provisions for storage, examination and the retention and disposal of relevant material for deaths. In regards to preserving the openness of the Green Belt, the proposed footprint of the extension will remain on developed land including the hard standing area. In respect to the second proviso of NPPF Para 145(b), the proposal does not conflict with the purposes outlined in Paragraph 134, which includes, to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns merging into one

another, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns or to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. As such, the proposed is not considered as an inappropriate development hence very special circumstances would not be required.

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

Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020) states that A) All development, including extensions, alterations and new buildings will be required to be designed to the highest quality 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 undesignated, and their settings; and v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure. B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs. D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The application site consists of an existing boundary fence. Although landscaping is proposed along the front palisade fence to provide additional screening and privacy to the property, the existing mortuary building is located on gentle upward slope. Therefore, when viewed from the street level, it is anticipated that only partial of the building will be screened however, the overall height and in particular, the new shielding house on the rooftop will still remain visible from the street scene.

However, given its unique isolated location and that the adjacent area consists mainly of two to four storey high commercial buildings within the Brunel University premise, the proposed development is considered to be in keeping with the street scene and unlikely be detrimental to the area in general. As such, is in accord with Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020).

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

The nearest residential property is located 65m north-west of the application site, which is separated by the Hillingdon Cemetery. There are existing landscaping along the application site's boundary fence therefore the proposed would unlikely be visible from the residential property and therefore would not impact on the amenity of the occupiers.

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

Not applicable to this application.

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

Policy DMT 2 of The Local Plan: Part 2 - Development Management Policies (2020) states 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 6 of The Local Plan: Part 2 - Development Management Policies (2020) states that A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. 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.

There are no changes to the existing car park layout as part of this application. The Council's Highways Officer has reviewed the proposed and is satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and therefore would not raise any highway safety concerns.

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

Refer to "Impact on the character & appearance of the area".

#### **7.12 Disabled access**

Not applicable to this application.

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

Not applicable to this application.

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

The proposed works to the mortuary building would result in the removal of 7 trees, of which 2 are dead/dying, with the remaining 5 trees proposed to be lost of Grade 'A' and Grade 'B' quality. It is regrettable that the loss of such high grade trees is required in order to facilitate this development. In order to mitigate the loss of such valued trees, it is proposed to secure 15 replacement trees to compensate for the loss (3 replacement trees for every Grade A and B tree lost), which will be secured by way of a condition. Additional boundary landscaping along the Kingston Road frontage is also proposed which is welcomed in order to secure a positive contribution to the street scene as you drive along Kingston Lane.

The Council's Trees/Landscape Officer was consulted and no objections were raised subject to the imposition of planning conditions and securing adequate replacement tree planting.

#### **7.15 Sustainable waste management**

Not applicable to this application.

#### **7.16 Renewable energy / Sustainability**

Not applicable to this application.

#### **7.17 Flooding or Drainage Issues**

Not applicable to this application.

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

Policy DMEI 14 of The Local Plan: Part 2 - Development Management Policies (2020) states that 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 continued improvement of air quality, especially within the Air Quality Management Area.

The application proposes the relocation of the existing plant on the front roof and in addition a new rooftop plant is to be installed. The rooftop plants are to be located in the centre and rear flat roof. It is proposed that a shielding housing will be erected to screen the rooftop plant from the street scene.

Given that there is an existing plant and that the location of the application site is considerably distanced from residential dwellings, it is unlikely that noise and air quality will impact the area in general. The immediate vicinity of the mortuary building comprises mainly of landscaping and open space associated with the cemetery.

The Council's EPU officer was consulted and no objections were raised subject to a planning condition.

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

Refer to "External Consultees".

#### **7.20 Planning obligations**

Not applicable to this application.

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

None.

#### **7.22 Other Issues**

None.

### **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**

Following the assessment of the proposal, it is considered that the scheme would amount to the exception set out in the NPPF (2019), Paragraph 145 part (b).

In accordance to the evidence provided by the applicant, the existing size of the mortuary is not viable to accommodate for the increasing population of the two boroughs it currently serves. As a result, there is a much need for an extension to the existing mortuary to meet the demands of the public. The additional space as a result of this development would not only provide a permanent capacity solution, it will provide a training space and post-mortem

services for high risk cases.

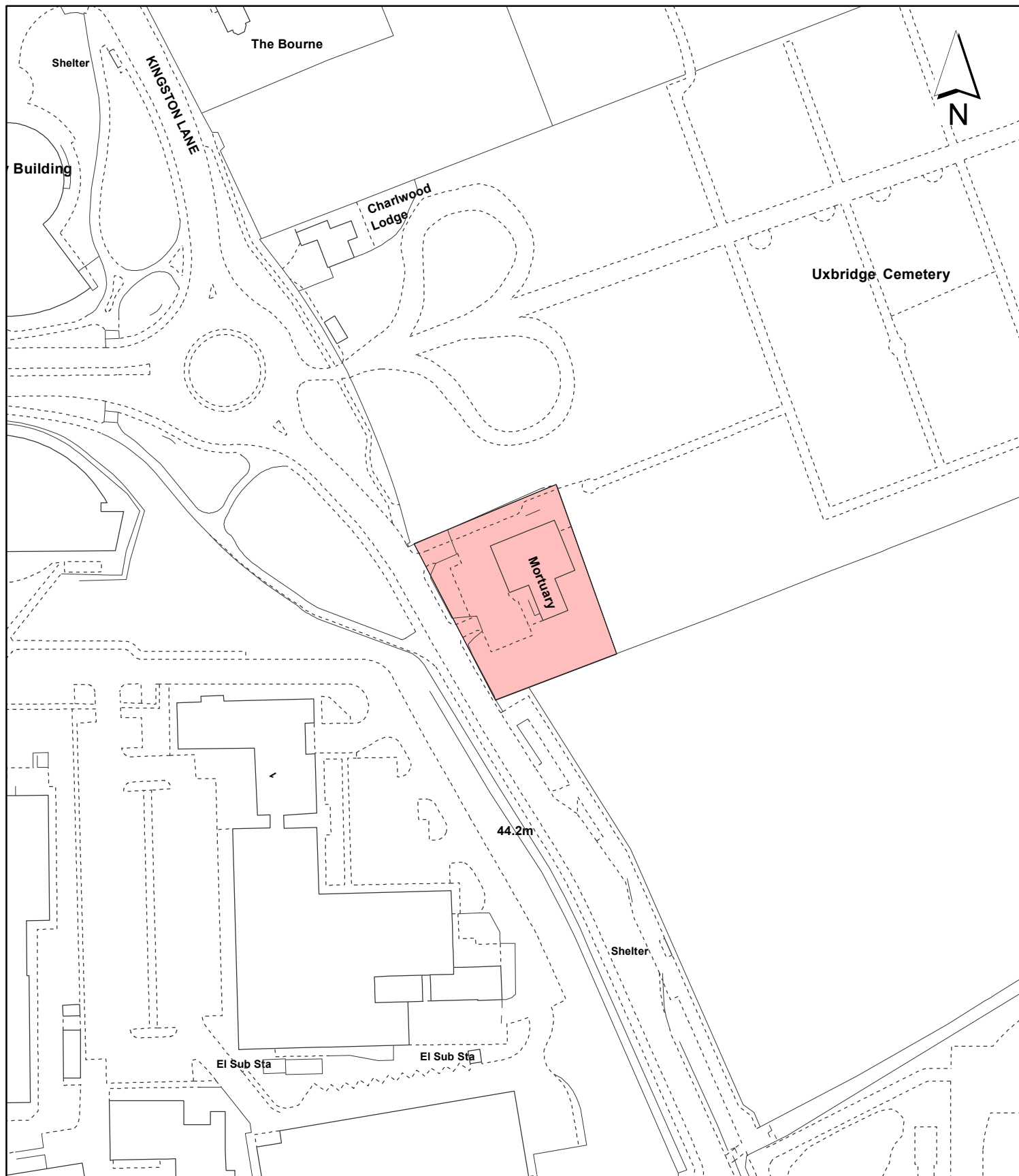
As such, this application is considered acceptable and is recommended for Approval.

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

The Local Plan: Part 1 - Strategic Policies (2012)  
The Local Plan: Part 2 - Development Management Policies (2020)  
The London Plan - Consolidated With Alterations (2016)  
Draft London Plan (Intend to Publish Version, December 2019)  
National Planning Policy Framework (2019)

**Contact Officer:** Rebecca Lo

**Telephone No:** 01895 250230



# Notes:

 Site boundary

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Site Address:

## Uxbridge Mortuary Kingston Lane

Planning Application Ref:

**13102/APP/2019/3950**

Scale:

**1:1,250**

Planning Committee:

**Major** Page 343

Date:

**February 2020**

## LONDON BOROUGH OF HILLINGDON Residents Services Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

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# Plans for Major Applications Planning Committee

## Wednesday 19th February 2020



HILLINGDON  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address** LITTLE BRITAIN LAKE PACKET BOAT LANE COWLEY

**Development:** Proposed footbridge over the River Colne at the north end of Little Britain Lake.

**LBH Ref Nos:** 52368/APP/2017/1844

**Date Plans Received:** 19/05/2017

**Date(s) of Amendment(s):**

**Date Application Valid:** 24/05/2017



NOTES: - DO NOT SCALE FROM THIS DRAWING. The Contractor must verify all dimensions at the site before setting out, commencing work, or making any shop drawings. Any discrepancies must be reported to the Contract Administrator before proceeding.

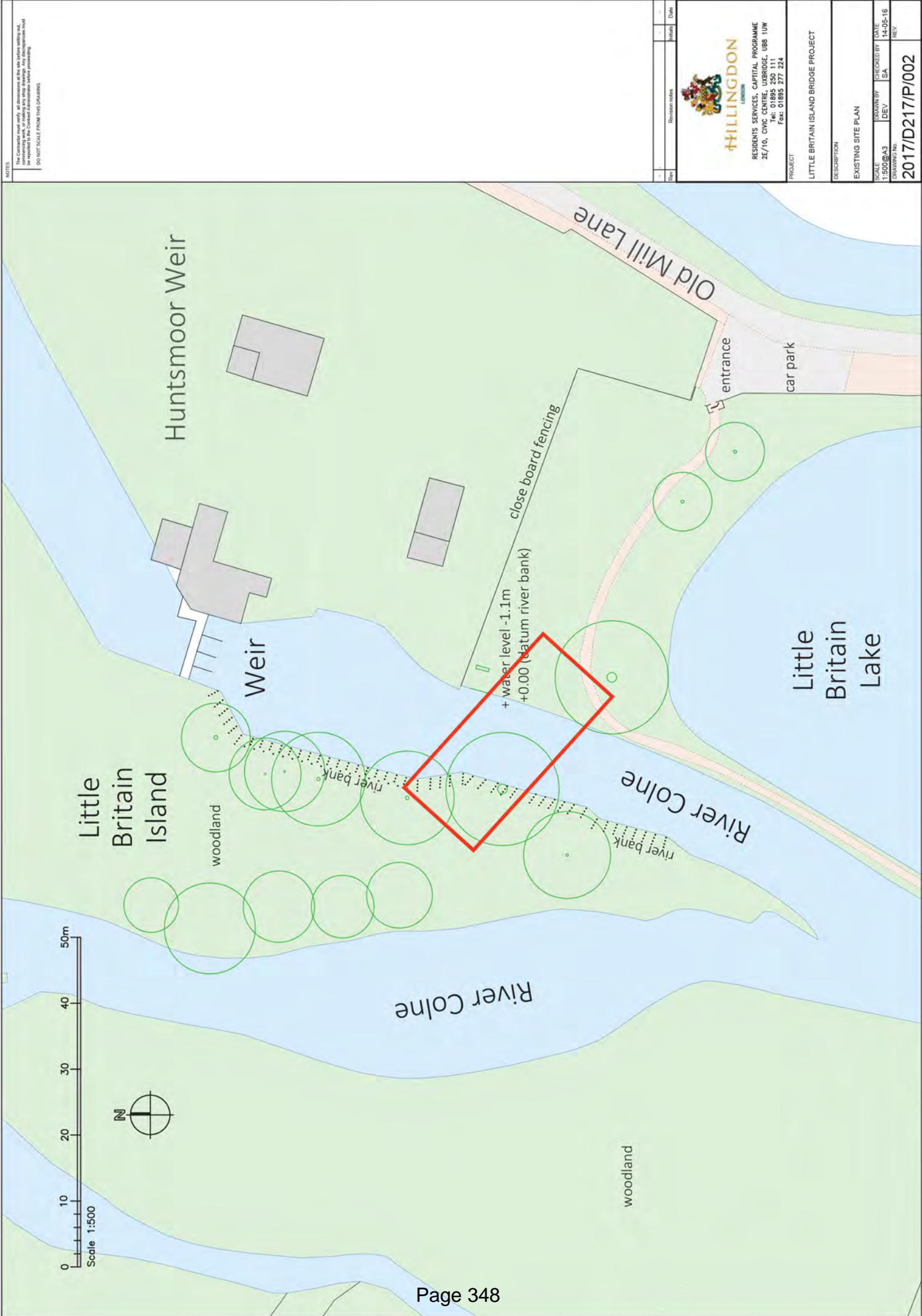
Rev	Revision notes	Initials	Date
-	-	-	-
Project <b>LITTLE BRITAIN ISLAND BRIDGE PROJECT</b>		Scale <b>1:1250@A4</b>	Drawn by <b>DEV</b>
Description <b>SITE LOCATION PLAN</b>		Date <b>15-05-17</b>	Checked by <b>SA</b>
Drawing No. <b>2017/D217/P/001</b>			Rev.



**HILLINGDON**  
LONDON

RESIDENTS SERVICES, CAPITAL PROGRAMME  
2E/10, CIVIC CENTRE, UXBRIDGE, UB8 1UW  
Tel: 01895 250 111  
Fax: 01895 277 224





NOTES

The Contractor must verify all dimensions at the site before setting out. Any discrepancy must be reported immediately to the design team. No part of this drawing should be used for any other purpose without the written consent of the design team.

Rev	Description	Issued	Date



**HILLINGDON**  
RESIDENTS SERVICES: CAPITAL PROGRAMME  
25/10, CHAC CENTRE, URBIDGE, URB 10W  
Tel: 01895 250 111  
Fax: 01895 277 224

PROJECT	
LITTLE BRITAIN ISLAND BRIDGE PROJECT	

DESCRIPTION	
EXISTING SITE PLAN	

SCALE	DRAWN BY	CHECKED BY	DATE
1:500 @ A3	DEV	SA	14-05-16

DRAWING No.	REV
2017/D217/P/002	

  
**WILLINGTON**  
LONDON

RESIDENTS SERVICES, CAPITAL PROGRAMME  
2E/10, CIVIC CENTRE, UXBIDGE, UBB 11UW  
Tel: 01895 250 111  
Fax: 01895 277 224

LITTLE BRITAIN ISLAND BRIDGE PROJECT

DESCRIPTION
-------------

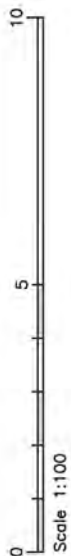
PROPOSED SITE PLAN

SALE	DRAWN BY	CHECKED BY	DATE
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DRAWING NO.	
REV.	

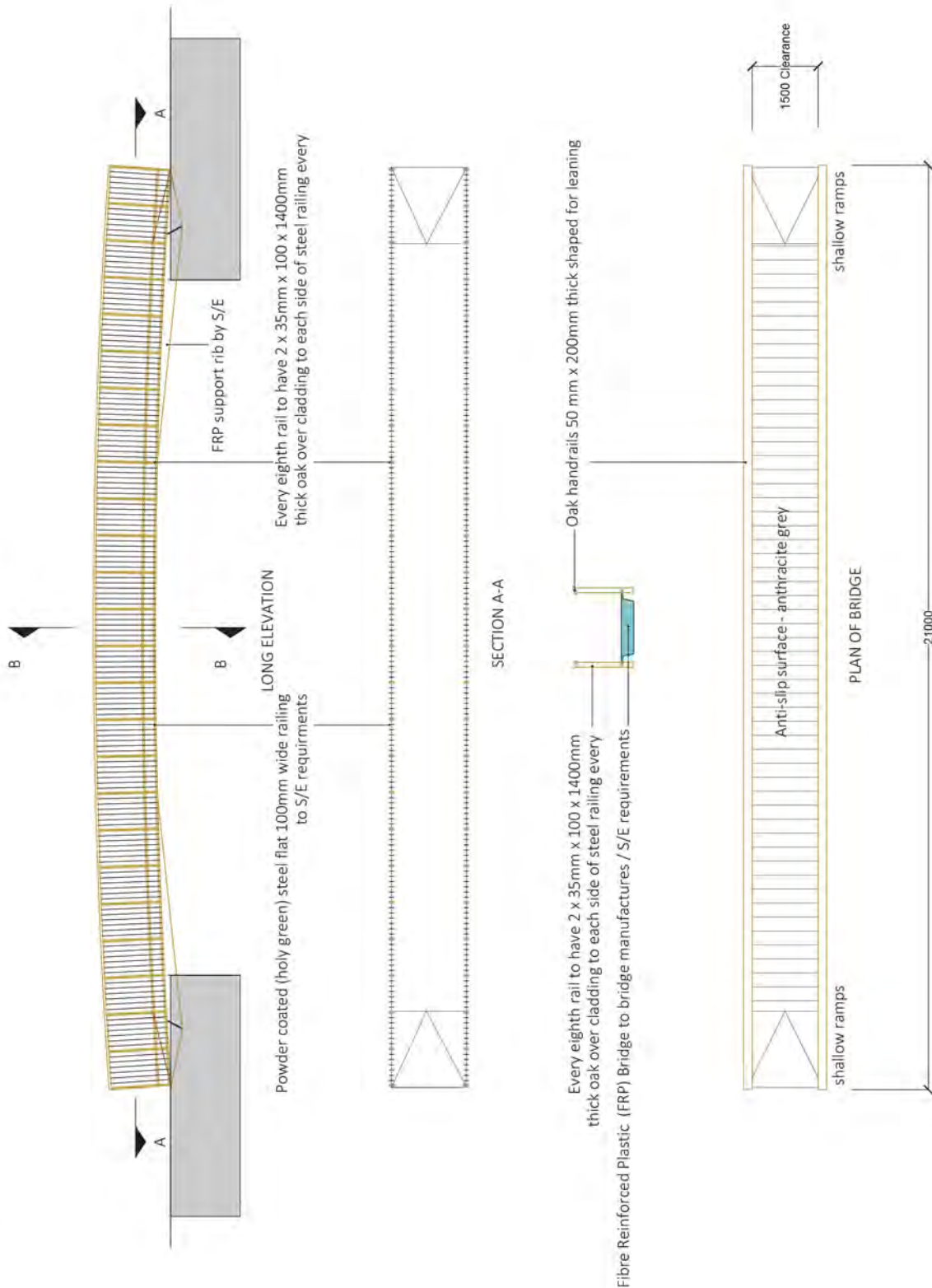






NOTES

The Contractor must verify all dimensions at the site before setting out.  
Dimensions are to be taken to the centre of the structure.  
DO NOT SCALE FROM THIS DRAWING



Rev	Description	Issued	Total

 <b>HILLINGDON</b> Council	
RESIDENTS SERVICES: CAPITAL PROGRAMME 26/10, CMC CENTRE, LIVERPOOL, URB 10W Tel: 01895 250 111 Fax: 01895 277 224	

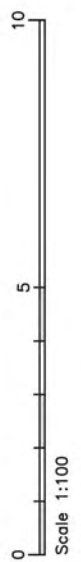
PROJECT LITTLE BRITAIN ISLAND BRIDGE PROJECT	
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DESCRIPTION PROPOSED PLAN, ELEVATION AND SECTION	
---	--

SCALE 1:100 @ A3	DRAWN BY DEV	CHECKED BY 14-05-18	DATE 14-05-18
DRAWING No.		2017/D217/P/004	

NOTES

The Contractor must verify all dimensions at the site before setting out.  
Dimensions are given in metres and are rounded to the nearest millimetre.  
DO NOT SCALE FROM THIS DRAWING



Rev	Description	Issued	Date

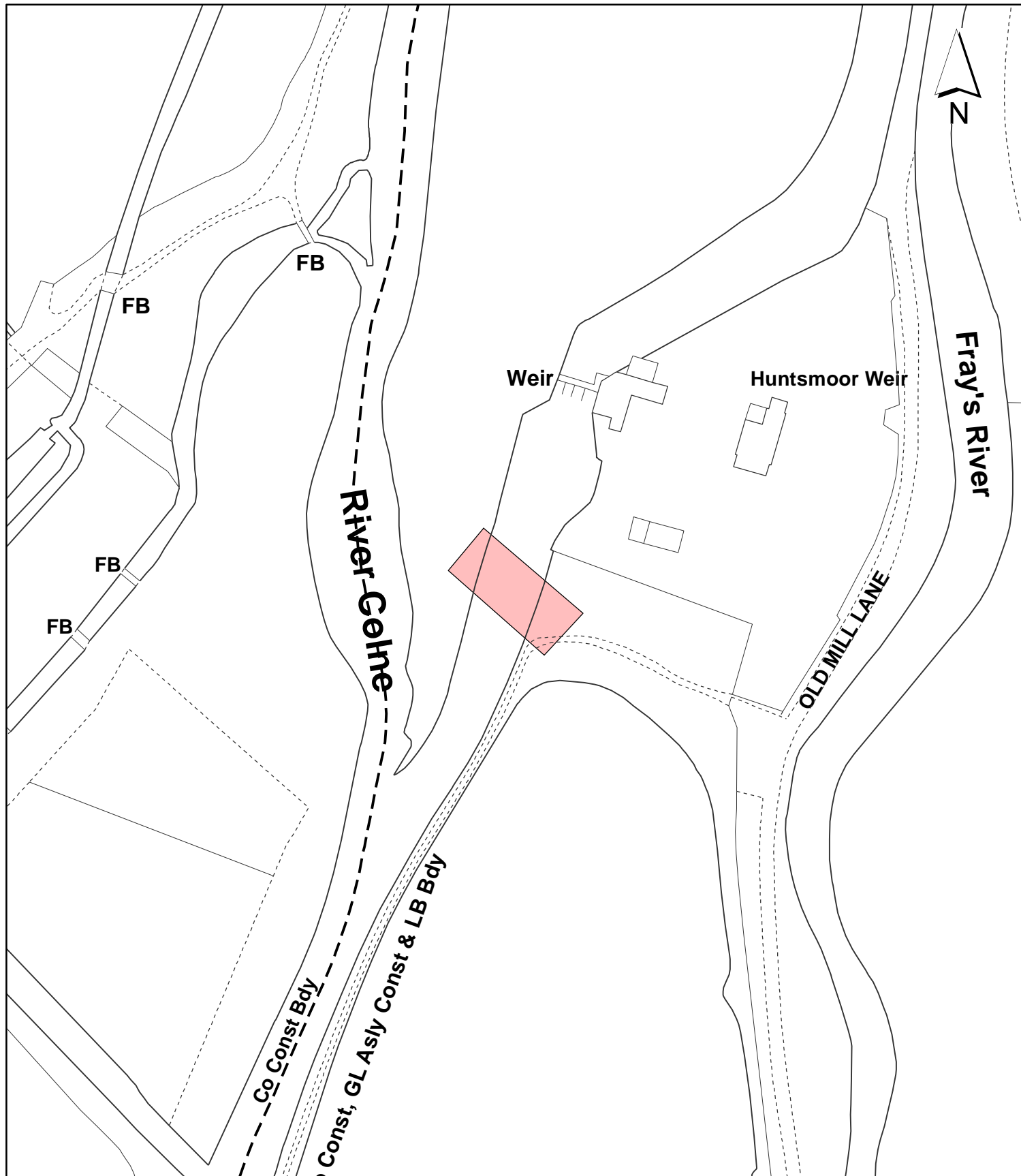


**HILLINGDON**  
COUNCIL

RESIDENTS SERVICES, CAPITAL PROGRAMME  
25/10, CHANCERY CENTRE, URBIDGE, URB 10W  
Tel: 01895 250 111  
Fax: 01895 277 224

PROJECT  
LITTLE BRITAIN ISLAND BRIDGE PROJECT

DESCRIPTION			
PROPOSED CONTEXT ELEVATION			
SCALE	DRAWN BY	CHECKED BY	DATE
1:100 @A3	DEV		14-05-16
DRAWING No.	REV		
2017/D217/P/005			



#### Notes:

 Site boundary

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Site Address:

**Little Britain Lake  
Packet Boat Lane**

Planning Application Ref:

**52368/APP/2017/1844**

Planning Committee:

**Major Page 352**

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON



## **Report of the Head of Planning, Transportation and Regeneration**

**Address** FORMER MASTER BREWER SITE FREEZELAND WAY HILLINGDON

**Development:** Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.

**LBH Ref Nos:** 4266/APP/2019/3088

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**BOUNDARIES**

ICKENHAM WARD

**SOFT LANDSCAPE**

**HARD LANDSCAPE**

**BOUNDARY TREE TYPES**

**STREET FURNITURE**

**PLANNING**

**BMD**

**INLAND HOMES**

**HILLINGDON GARDENS**

**LANDSCAPE MASTERPLAN**

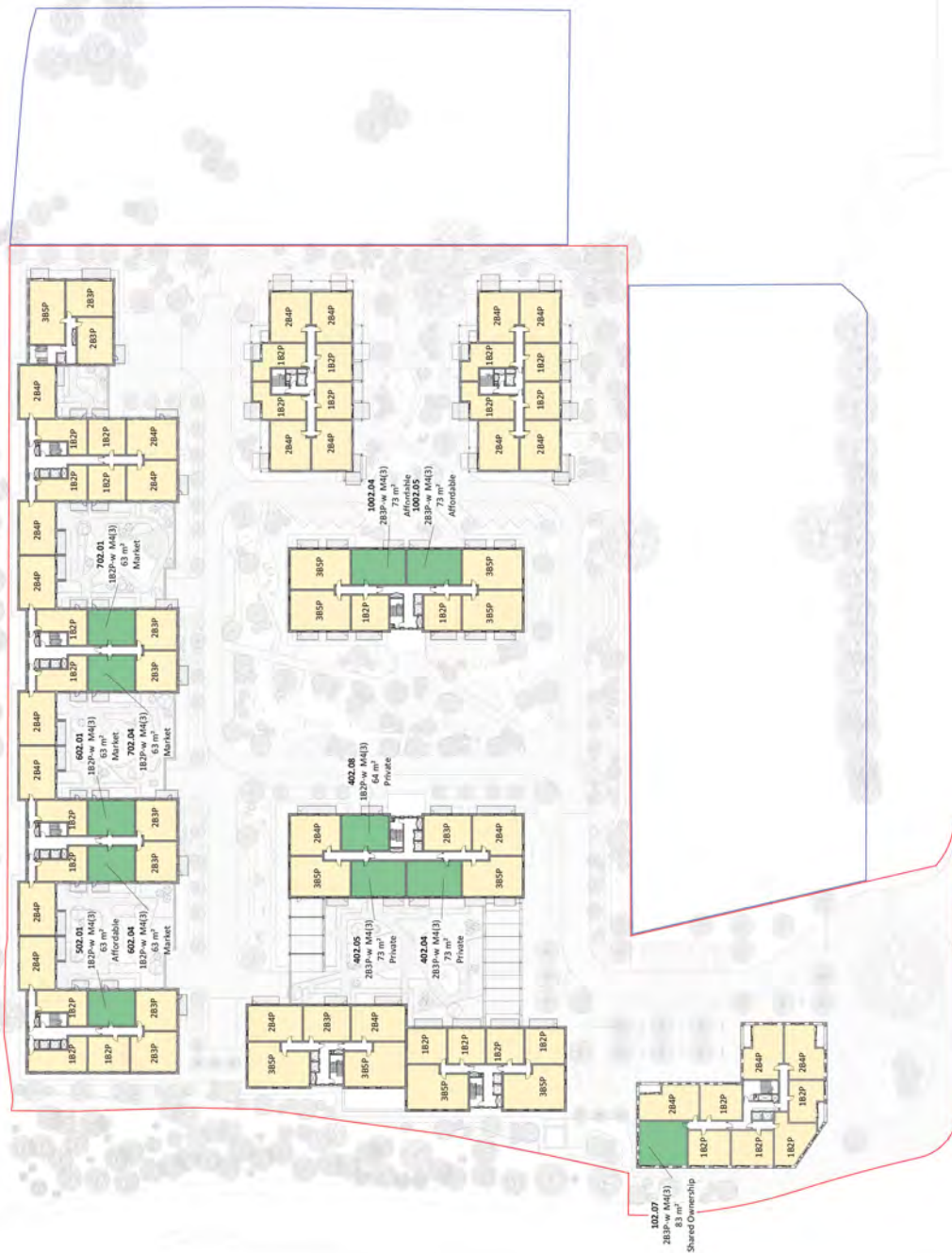
Project: Hillingdon Gardens  
Drawing Title: Landscape Masterplan  
Client: Inland Homes











1 Second Floor plan  
1 : 500











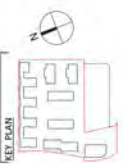
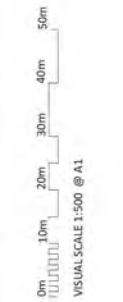












Reqs.	Notes	Date	Per	Auth.
P1	DRAP Planning Scope	30-06-19	CS	Y48
P2	Issues for Planning	15-07-20	CS	F48
P3	Planning and release	15-09-21	CS	F48

**NOTES**

- Refer to highway consultant's drawings for details
- Refer to landscape consultant's drawings for details
- Landscaping layout is indicative only

**AREAS**

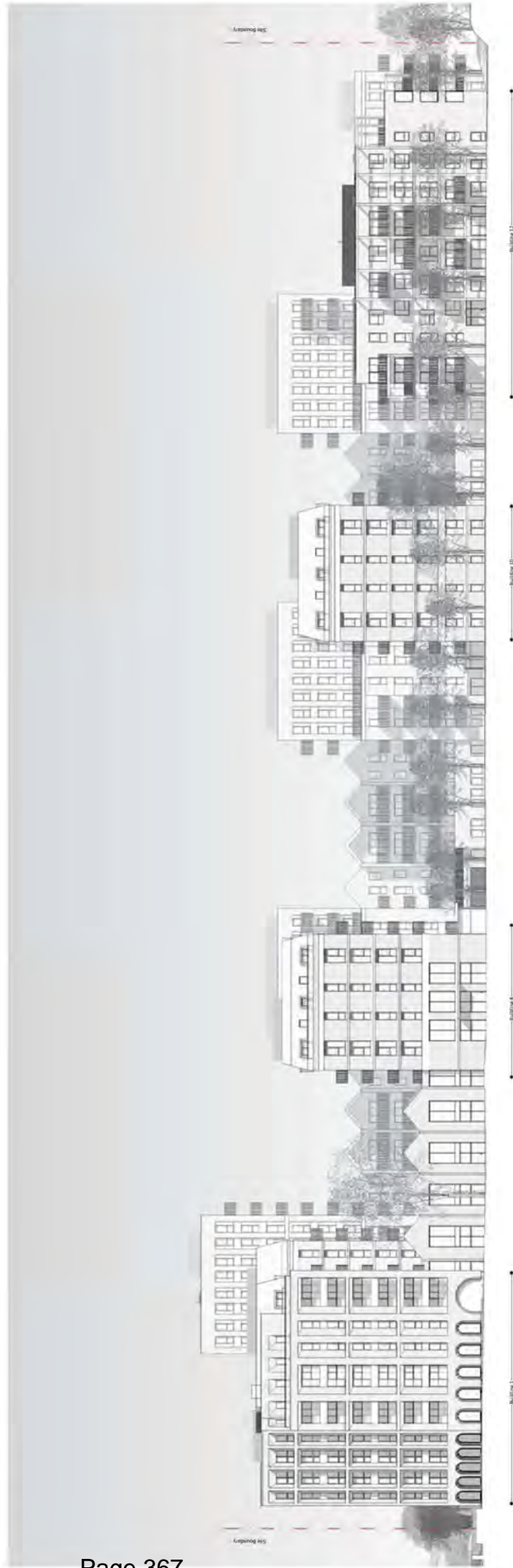
- Refer to area schedule

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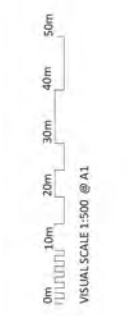
1 Site Elevation - South  
1 : 500



2 Site Elevation - South  
1 : 250

NOTES  
CONSULTANTS  
Refer to architect's drawings for details  
Landscape & Urban Planning  
ARCHITECT  
Refer to site plan

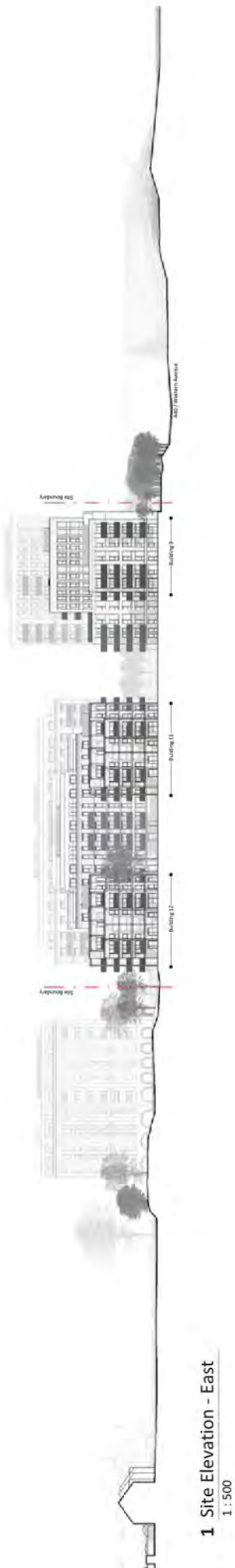
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100	Issue for Planning	18-08-24	CS	CS



ColladoCollins Architects  
Inland Homes  
Hillingdon  
Site Elevations Sheet 2  
PLANNING  
19011  
P0-301

11 Hill Street  
London W14 8JF  
T: 020 7468 2017  
F: 020 7468 2018  
www.colladocollins.com

Date: 09/02/19  
Drawn by: J.C.  
Reviewed by: J.C.  
Scale: A1, As Indicated  
Drawing No: 19011-02  
Sheet No: 02 of 02



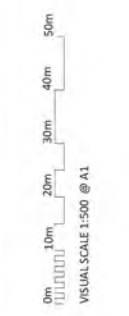
**NOTES**

CONSULTANTS  
 - Refer to landscape architect's drawings for details  
 - Landscape layout is indicative only  
 - All work to be done within the site boundary

APPROVED  
 [Signature]  
 [Name]  
 [Title]

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Rev.	Date	By	For
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**ColladoCollins Architects**

1111 1st Street  
 Suite 100  
 San Diego, CA 92101  
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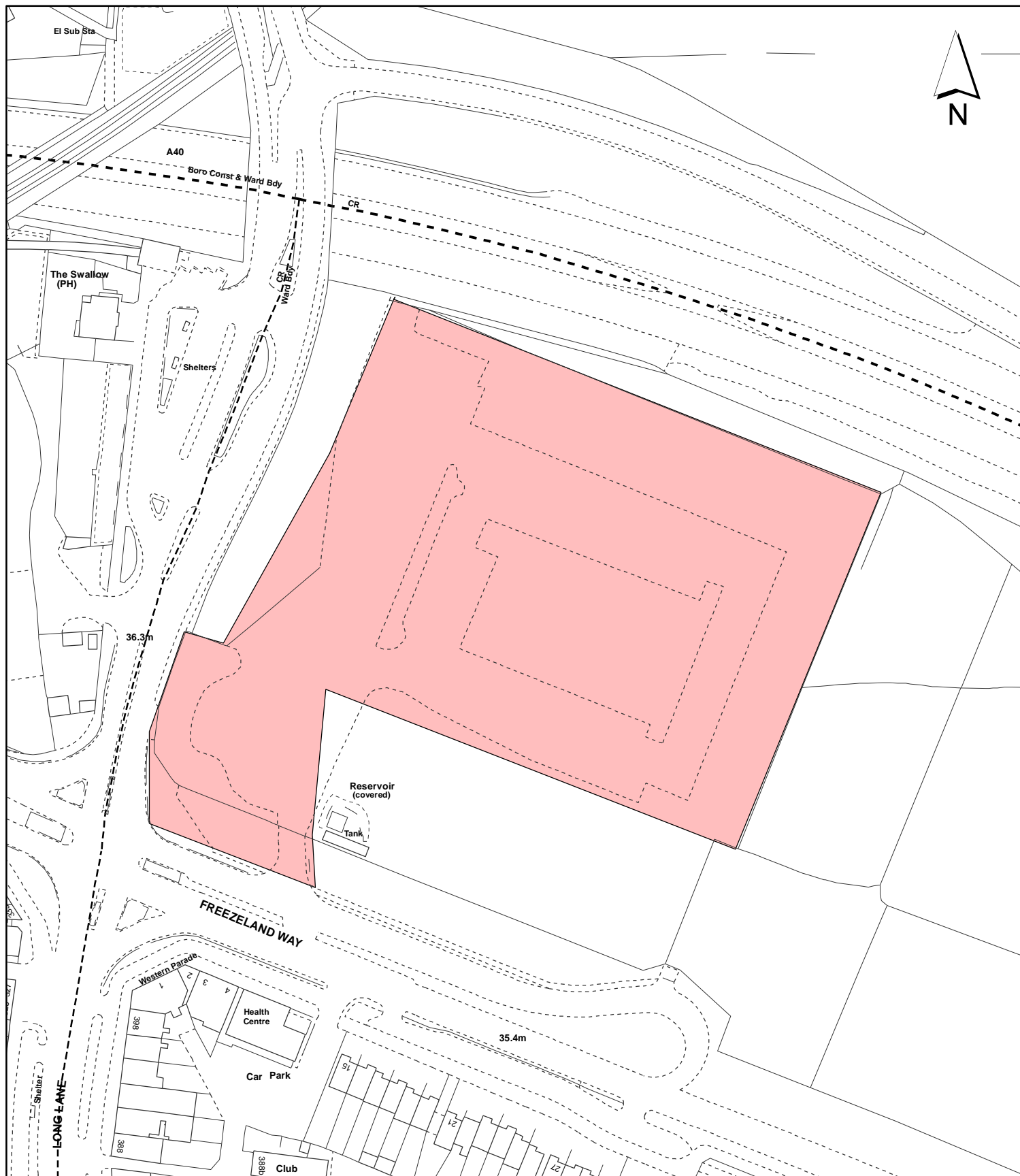
Date: 09/02/19  
 Drawn by: JBC  
 Checked by: JBC  
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 Sheet # of 3: 1 of 3

**Inland Homes**  
**Hillingdon**  
**Site Elevations Sheet 3**

**PLANNING**  
**19011**  
**P0-302**







#### Notes:

 Site boundary

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Site Address:

### Former Master Brewer Site Freezeland Way

Planning Application Ref:

**4266/APP/2019/3088**

Planning Committee:

**Major Page 370**

Scale:

**1:1,650**

Date:

**February 2020**

### LONDON BOROUGH OF HILLINGDON

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address**                   BOURNE COURT SITE BOURNE COURT RUISLIP

**Development:**       Deed of Variation to Section 106 Schedule 1 (Affordable Housing) associated with planning permission ref: 11891/APP/2018/3414, dated 17/06/19 (Redevelopment to provide 87 residential units in two blocks, together with associated access, car and cycle parking; communal and private amenity space; and landscaping) to remove the requirement for a commuted sum and replace it with an affordable housing obligation for an on-site provision with 54 shared ownership units in Block A and 33 affordable rented units in Block B.

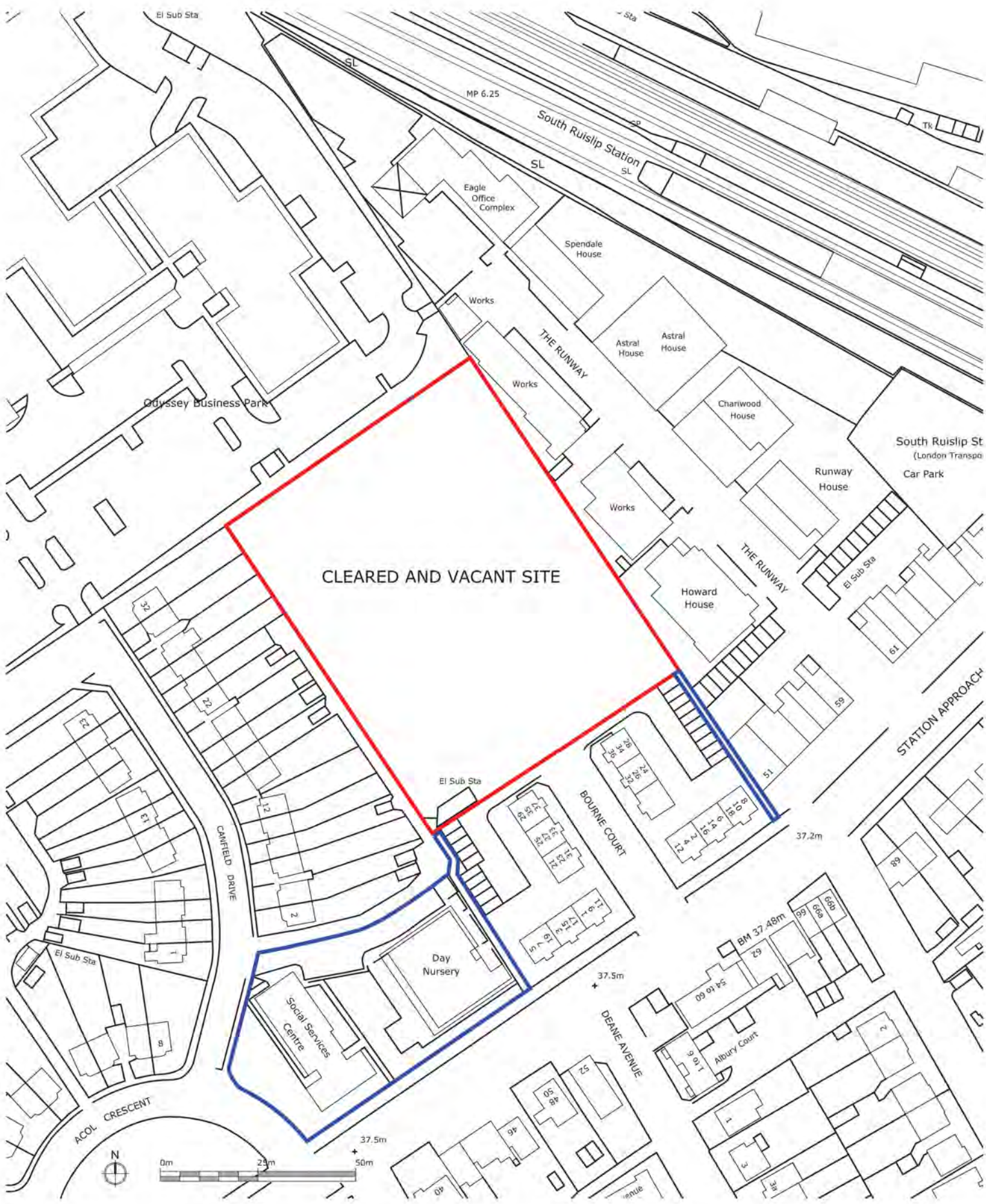
**LBH Ref Nos:**       11891/APP/2019/3855

**Date Plans Received:**   28/11/2019

**Date(s) of Amendment(s):**

**Date Application Valid:** 29/11/2019





CLEARED AND VACANT SITE

Project  
Bourne Court Ruislip

Client

Project No.  
303  
DWG Type  
PL  
Date  
06/07/18

Drawing Title  
Site Location Plan  
DWG No  
010  
Drawn  
MR

Rev  
00  
Checked  
BW

Scale  
1:1250  
Status  
For Approval

We warrant that the drawings are the work of our staff or those of our sub-contractors. We warrant that the drawings are prepared in accordance with the requirements of the Building Regulations and the Building Act 1984. We warrant that the drawings are prepared in accordance with the requirements of the Building Regulations and the Building Act 1984. We warrant that the drawings are prepared in accordance with the requirements of the Building Regulations and the Building Act 1984.

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London and Essex  
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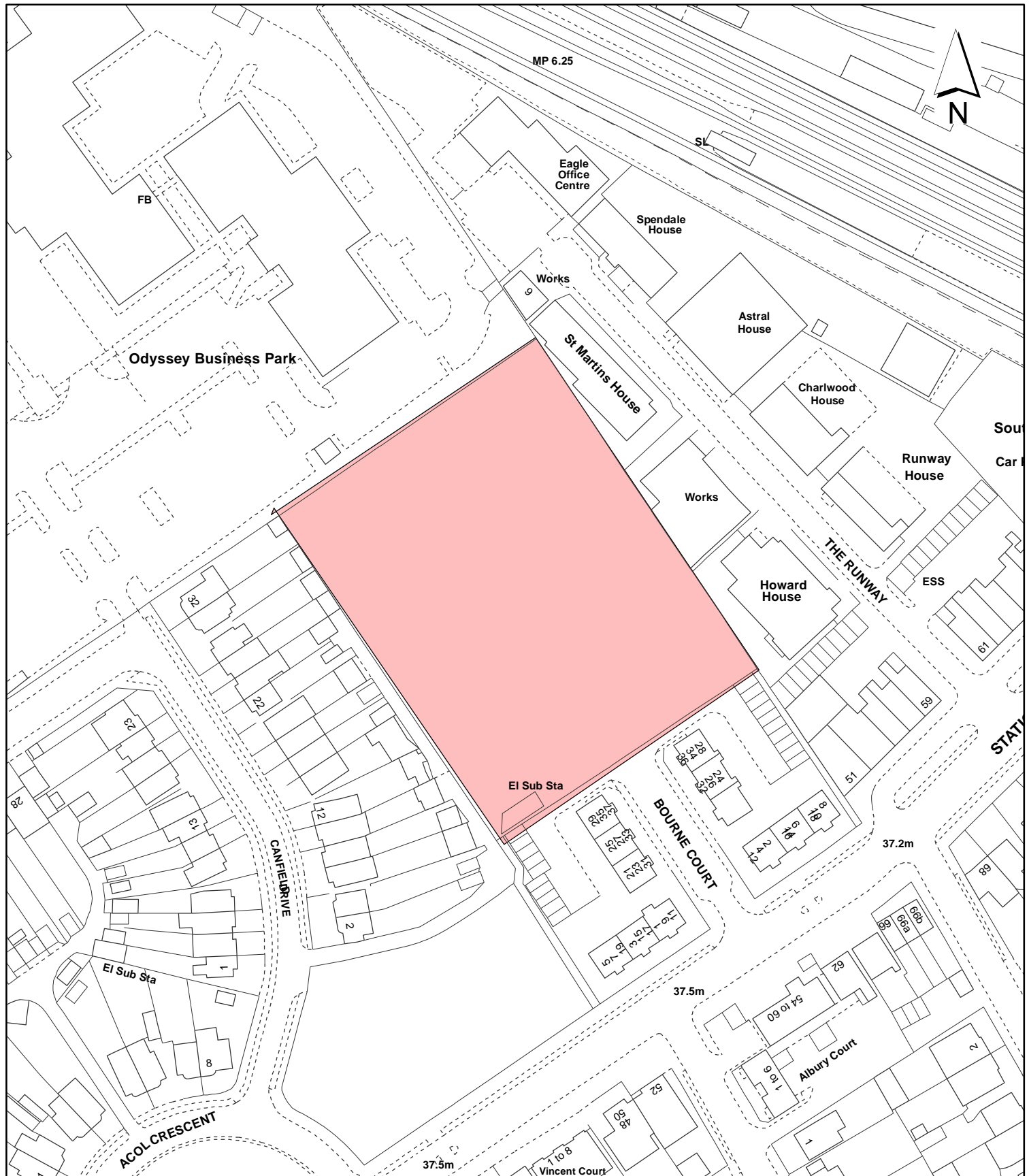
Project No	303	Drawing Title	Proposed Site Plan
DWG Type	PL	DWG No	100
Date	15/03/19	Rev	02
		Checked	BW
		Scale	1:500
		For Approval	

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Project  
**Bourne Court**  
**Ruislip**  
 Client

www.wam-architecture.co.uk





# Notes:

 Site boundary

For identification purposes only.

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Site Address:

## Bourne Court Site Bourne Court

Planning Application Ref:

**11891/APP/2019/3855**

Planning Committee:

**Major Page 374**

Scale:

**1:1,250**

Date:

**February 2020**

## LONDON BOROUGH OF HILLINGDON

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address** CRANFORD PARK THE PARKWAY HAYES

**Development:** The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works.

**LBH Ref Nos:** 14009/APP/2019/4088



DO NOT SCALE DRAWINGS. THE CONTRACTOR  
 SHALL BE RESPONSIBLE FOR VERIFYING  
 ANY DISCREPANCY IS TO BE RETURNED TO THE  
 ARCHITECT

REV.	REVISION	DATE
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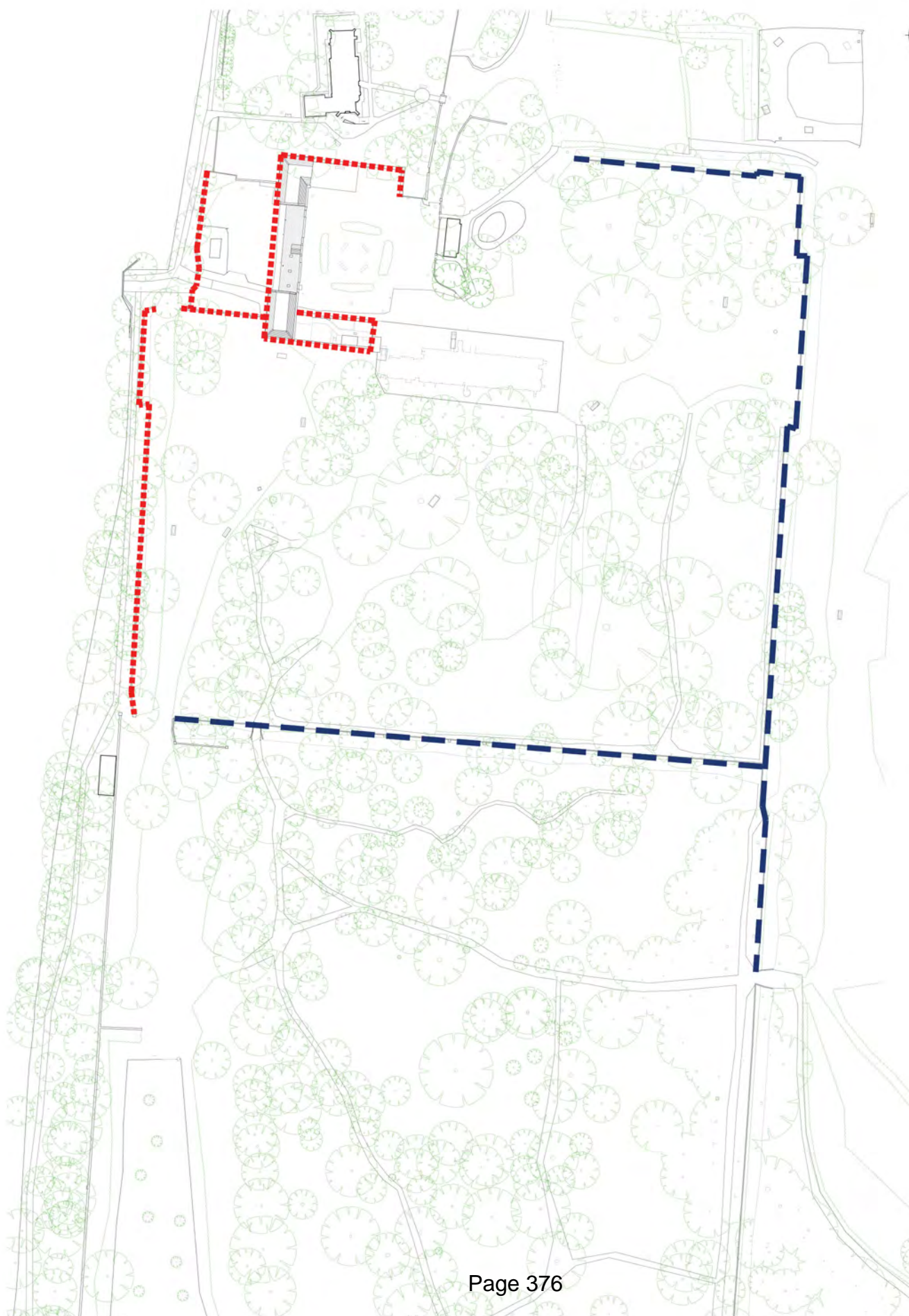
**THOMAS  
 FORD  
 & PARTNERS  
 CHARTERED  
 ARCHITECTS  
 SURVEYORS**

177 KIRKDALE  
 STONEHAM • LONDON • SE25 4QH  
 TEL 020 8697 3255 • FAX 020 8697 3116  
 E-MAIL: info@thomasford.co.uk

PROJECT  
 HILKINGTON  
 CRANFORD PARK

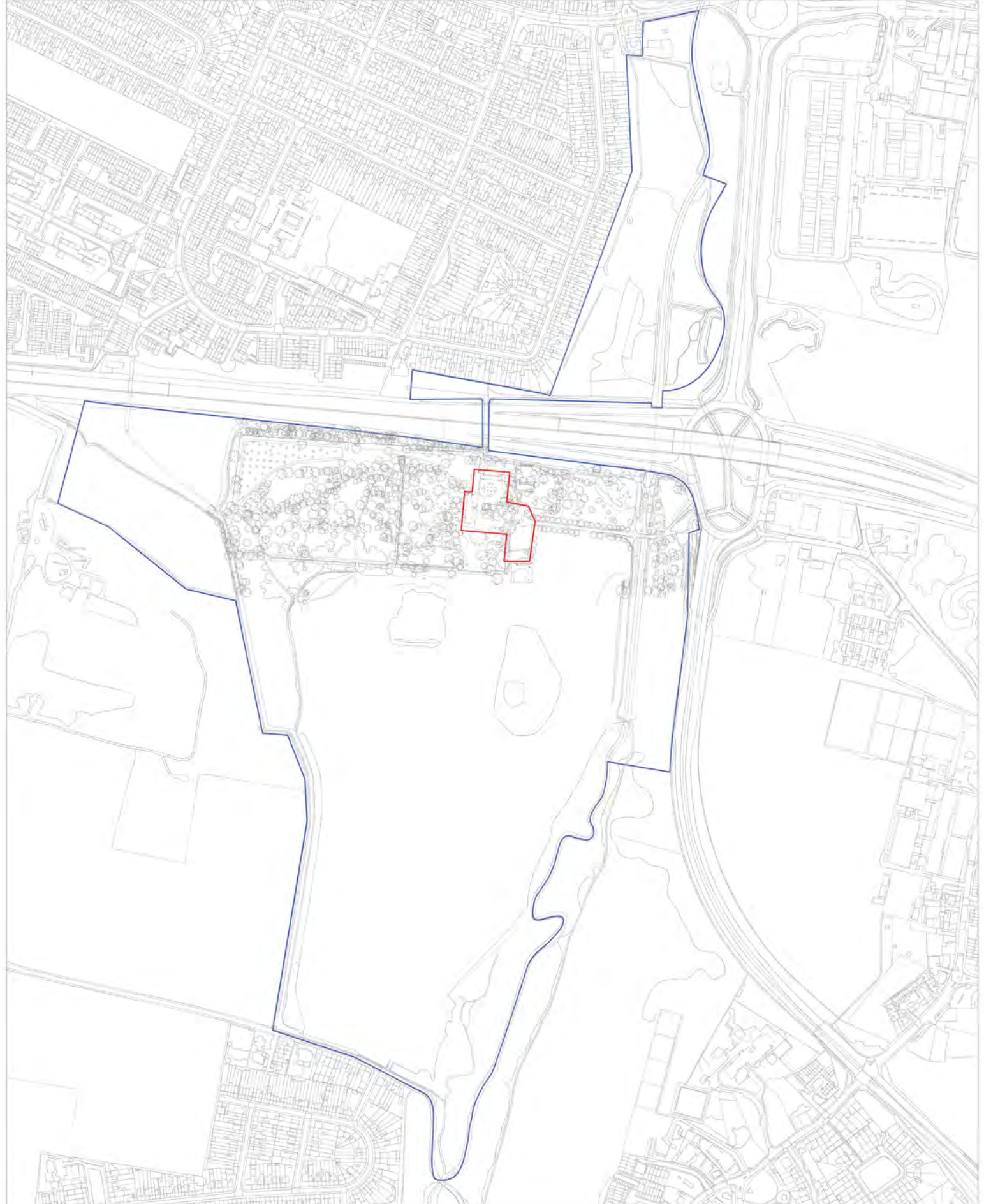
TITLE  
 SITE PLAN  
 AS EXISTING

DRAWN	DATE	SCALE	CHECKED
Seel	Jan 19	1:500 (A1)	REV
		1:1000 (A3)	PI
		535401	EX-001



A SITE PLAN  
 - AS EXISTING





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**KEY**

-  Application Boundary
-  Cranford Park Boundary

PT 13.12.19 WZ For Planning  
Rev. Date Draw Revision or reason for issue

Scale North Point

0 100m

 **CHRIS BLANDFORD ASSOCIATES**  
landscape | environment | heritage  
Woollyard, 52 Bermondsey Street, London SE1 3UD  
T 020 7089 6480 E mail@cbastudios.com W www.cbastudios.com

Client  
**LONDON BOROUGH OF HILLINGDON**

Project Title  
**CRANFORD PARK**

Drawing Series and Title  
**0100 SERIES  
Site Plan**

Scale @ A1  
1:2,500

Drawn  
WZ

Approved  
AS

Date  
**NOV 2019**

Drawing Status  
**For Planning**

Drawing number  
50027501-CBA-1-GF-DR-L-0001

Revision  
P1

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REV	AMENDMENT	DATE
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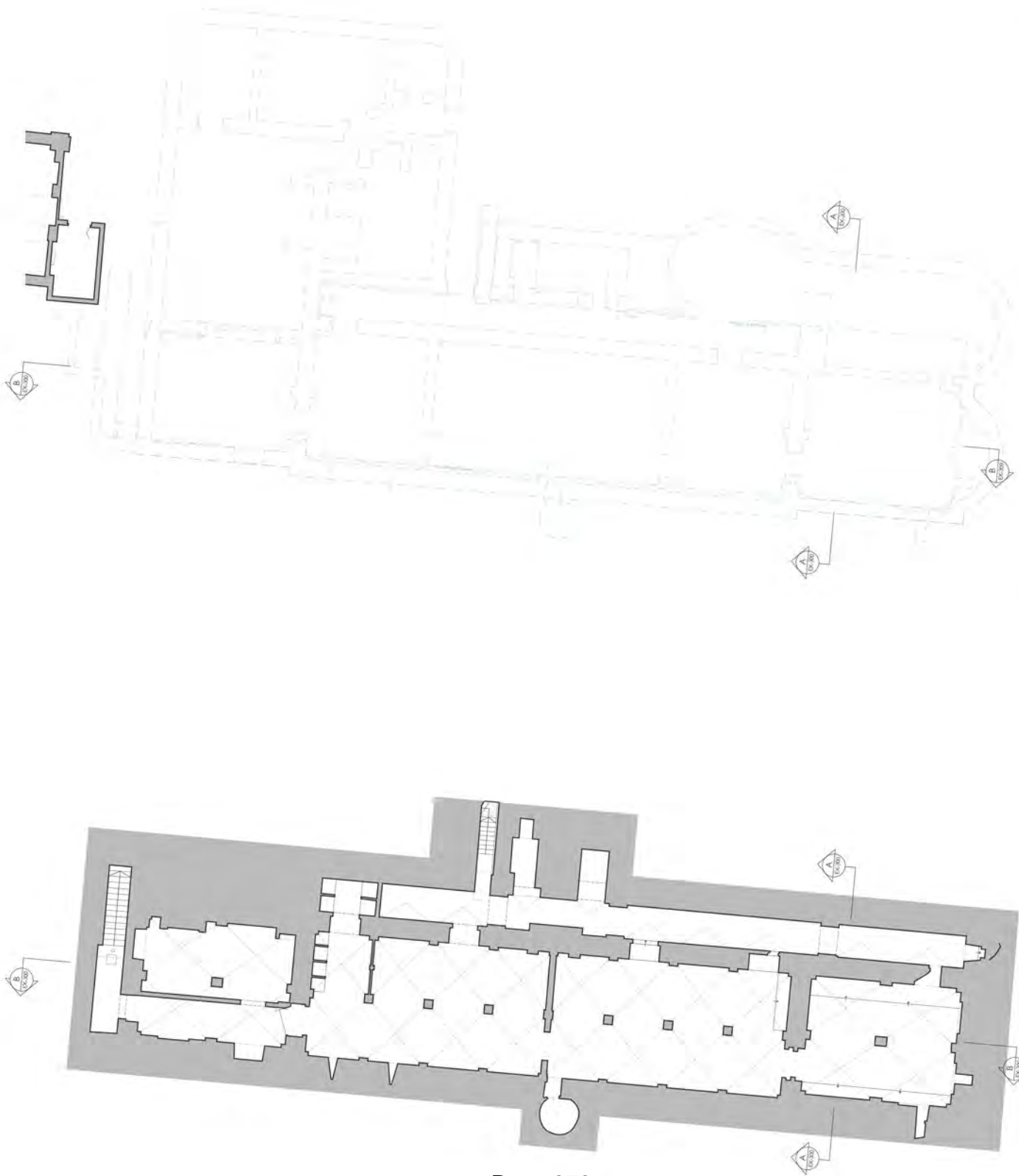
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E: info@thomasford.co.uk

PROJECT  
HILKINGTON  
CRANFORD PARK

TITLE  
BASEMENT PLAN  
AS EXISTING

DRAWN	CHECKED
Seid	Jan 19
PROJECT REF	1:1000(A1)
DATE	EX-100
PI	535401



**B** BASEMENT OUTLINE AT GROUND FLOOR LEVEL  
AS EXISTING

**A** BASEMENT PLAN  
AS EXISTING



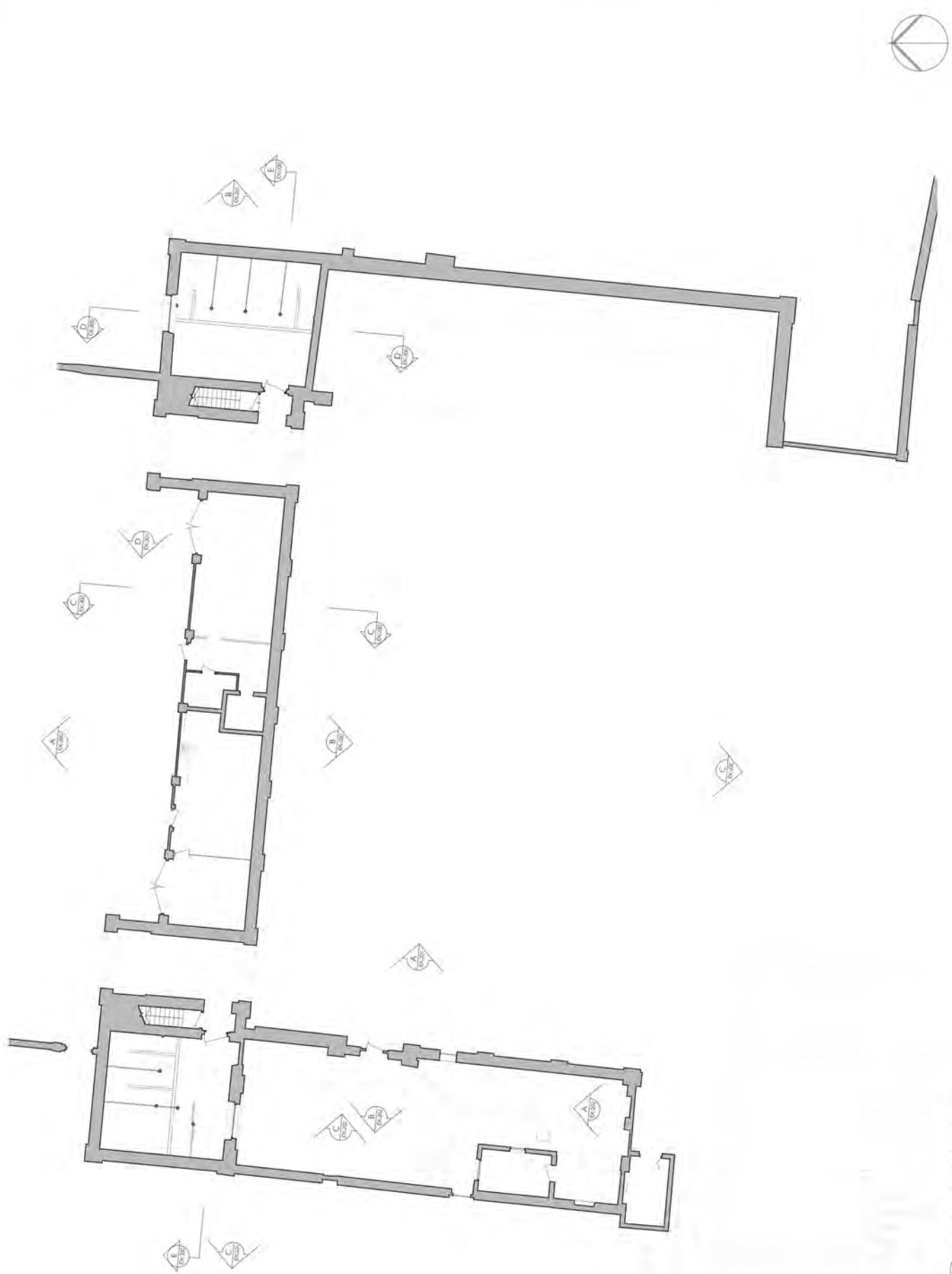
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REV	DATE	DESCRIPTION
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**SURVEYORS**  
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 TEL 020 895 3232 • FAX 020 895 3116  
 E-MAIL: info@thomasford.co.uk

PROJECT		HILKINGTON CRANFORD PARK	
TITLE		GROUND FLOOR PLAN AS EXISTING	
DATE	1 Jun 19	CHECKED	OK
DESIGNED BY	SAJ	DATE	1 Jun 19
PROJECT NO	535401	EX-101	P1



**A** GROUND FLOOR PLAN  
 AS EXISTING

DO NOT SCALE DRAWINGS. THE CONTRACTOR  
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 ARCHITECT

REV: DATE:



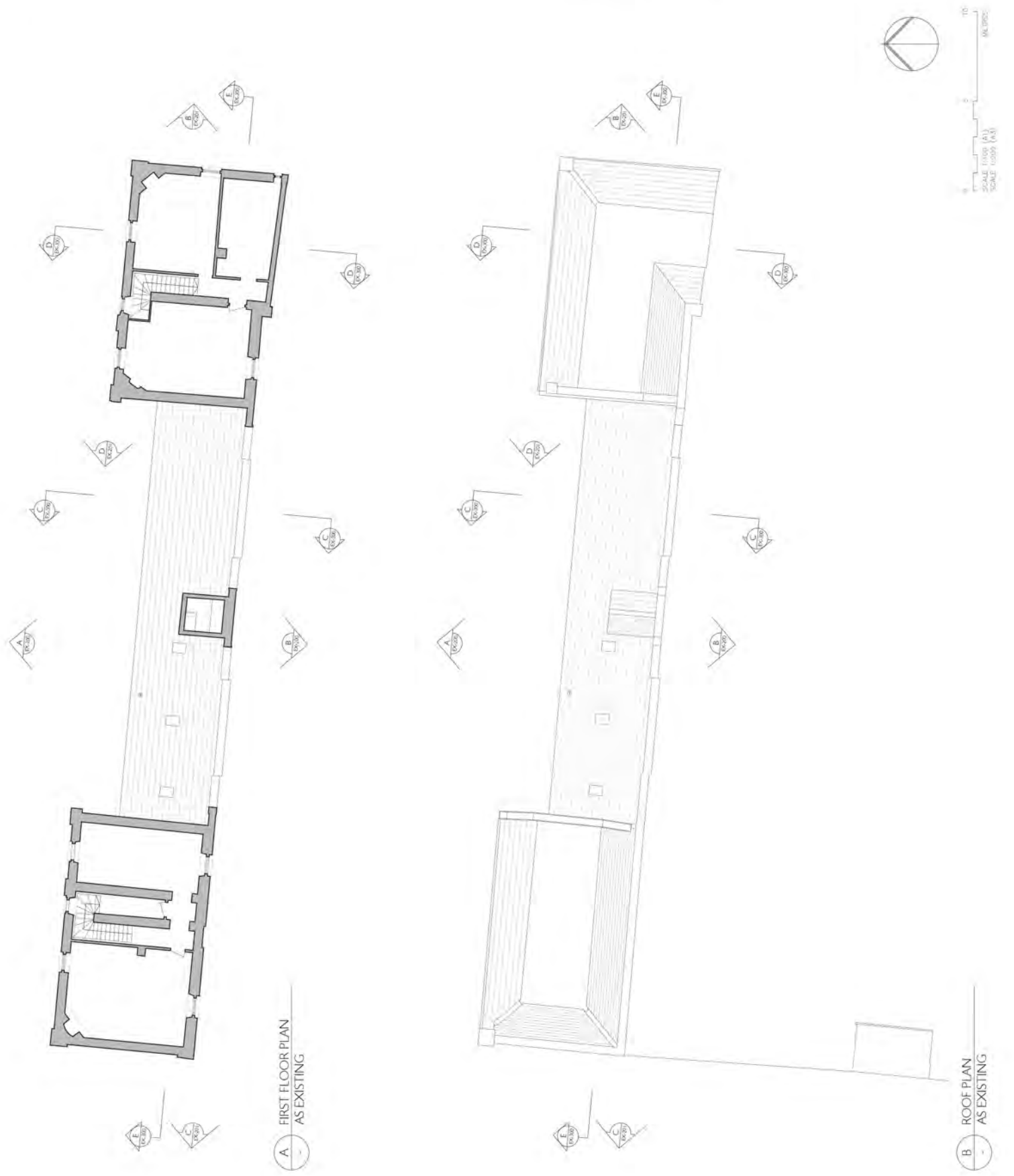
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 & PARTNERS**  
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 E-MAIL: info@thomasford.co.uk

PROJECT  
 HILINGDON  
 CRANFORD PARK

TITLE  
 FIRST FLOOR & ROOF  
 PLANS  
 AS EXISTING

REVISION	DATE	CHANGED	DRAWN	CHECKED
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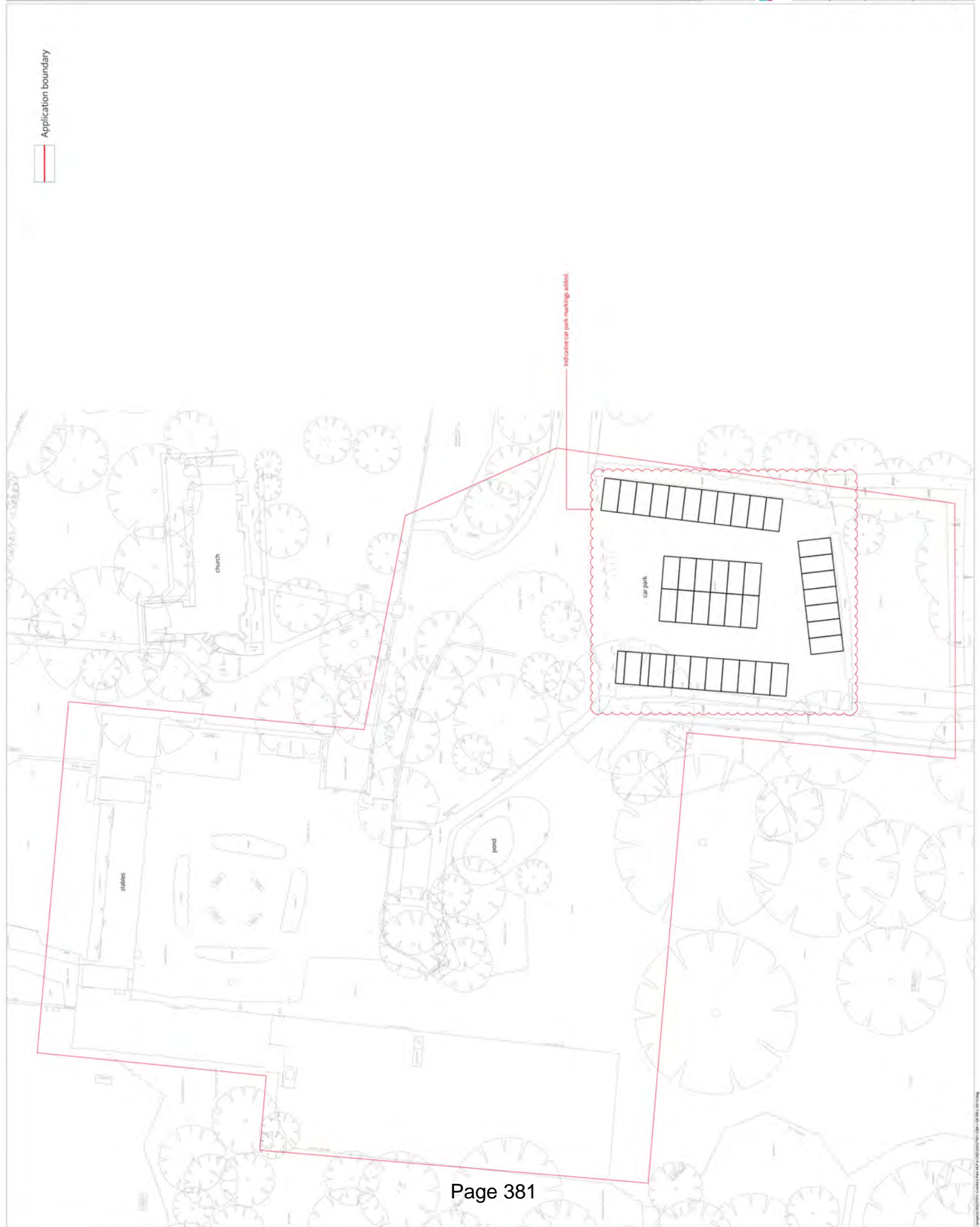
**A** FIRST FLOOR PLAN  
 AS EXISTING

**B** ROOF PLAN  
 AS EXISTING



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Application boundary



Project	21/01/2019	WZ	Existing parking spaces added
Client	London Borough of Hillingdon	WZ	Revised car park markings added
Drawn	WZ	WZ	Revised car park markings added
Scale	North Point	WZ	Revised car park markings added



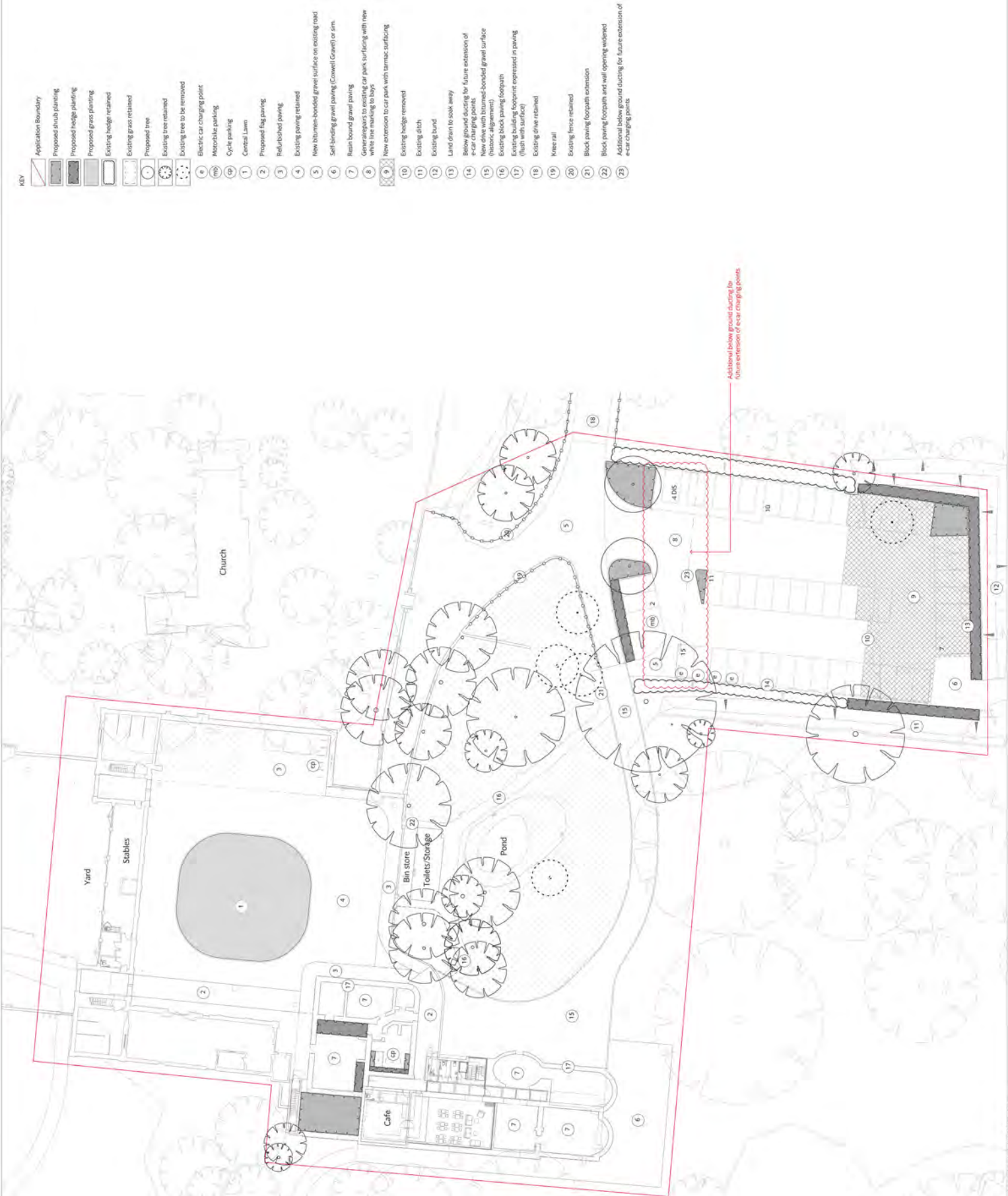
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CHRIS BLANDFORD ASSOCIATES  
landscape | environment | heritage

Client	LONDON BOROUGH OF HILLINGDON
Project Name	CRANFORD PARK
Drawing Series and Title	3000 SERIES Existing Site Plan
Scale @ A1	1:250
Drawn	WZ
Checked	WZ
Approved	AS
Date	NOV 2019
For Planning	For Planning
Drawing number	50027501-CBA-1-GF-DR-L-0010
Revision	P2

KEY

- Application Boundary
- Proposed shrub planting
- Proposed hedge planting
- Proposed grass planting
- Existing hedge retained
- Existing grass retained
- Proposed tree
- Existing tree retained
- Existing tree to be removed
- Electric car charging point
- Motorcycle parking
- Cycle parking
- Central Lawn
- Proposed flag paving
- Refurbished paving
- Existing paving retained
- New bitumen-bonded gravel surface on existing road
- Self-binding gravel paving (Coxwell Gravel) or sim.
- Resin bound gravel paving
- General paving to existing car park surfacing with new white line marking to bays
- New extension to car park with tarmac surfacing
- Existing hedge removed
- Existing ditch
- Existing bund
- Land down to soak away
- Below ground ducting for future extension of car charging points
- New bitumen-bonded gravel surface (historic alignment)
- Existing block paving footpath
- Existing building footprint expressed in paving (flush with surface)
- Existing drive retained
- Knee rail
- Existing fence retained
- Block paving footpath extension
- Block paving footpath and wall opening widened
- Additional below ground ducting for future extension of car charging points



DO NOT SCALE DRAWINGS THE DIMENSIONS  
 SHOWN ARE APPROXIMATE AND SHOULD BE  
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 ARCHITECT

31

Rev Date

Dec 19

Drawn

THOMAS  
FORD

& PARTNERS

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ARCHITECTS  
SURVEYORS

(17) VERTICAL

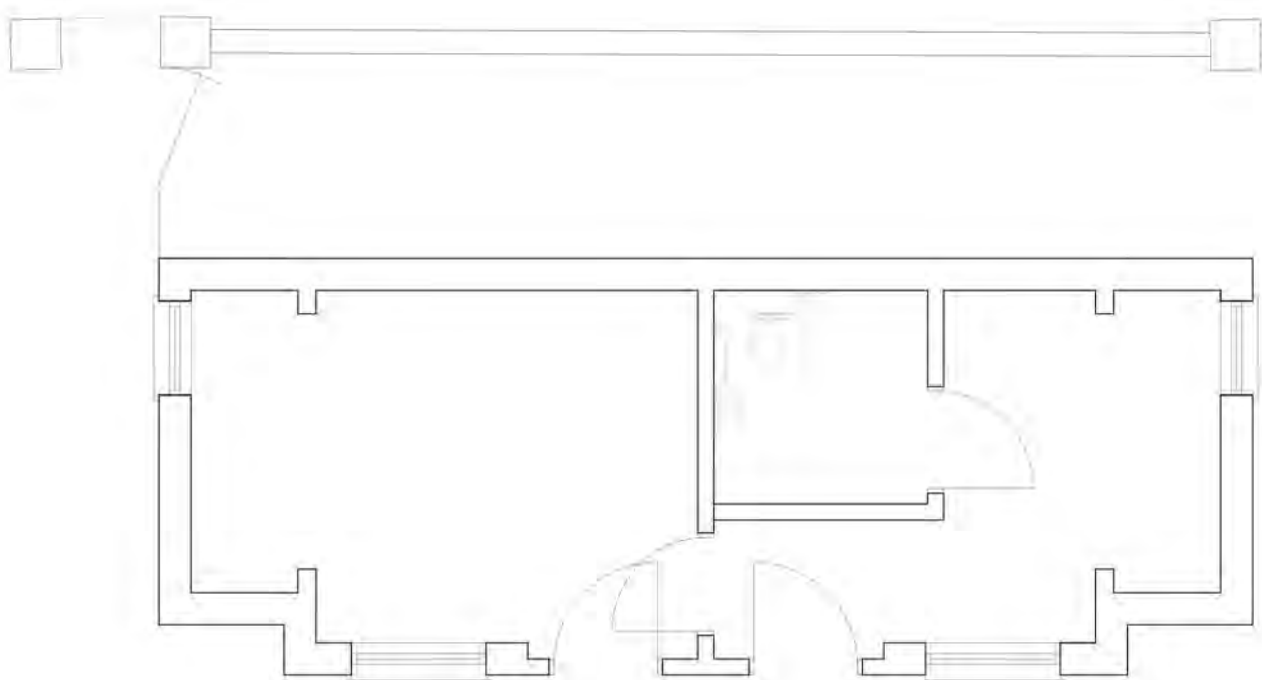
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 TEL: 020 894 3332 • FAX: 020 894 3116  
 E: info@thomasford.co.uk

HILLINGDON

CRANFORD PARK

EXISTING VISITOR CENTRE  
PLANS

DATE	BY	CHKD	CHKD
14	DEC 19	J.25	...
PROJECT NO			...
S33401			EX-400
			PI



A  
 EXISTING VISITOR CENTRE  
 AS EXISTING PLAN



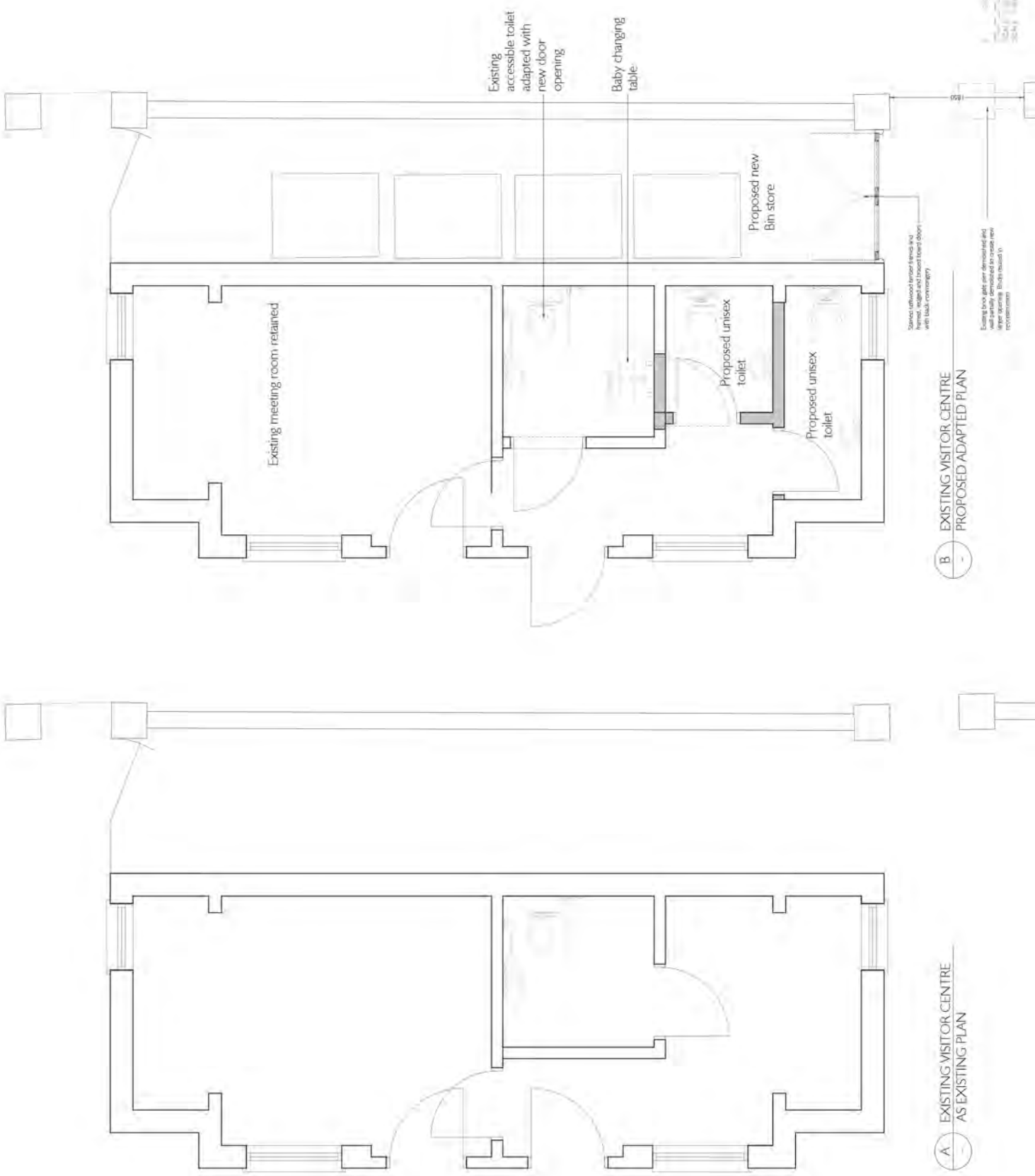
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P1 - REVISED DRAWING - DEC 2019

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PROJECT		HILLINGDON CRANFORD PARK	
TITLE		EXISTING VISITOR CENTRE PROPOSALS PLANS	
DATE	19 DEC 19	SCALE	1:25
PROJECT NO	535401	PL	PL-400
PI			



**A** EXISTING VISITOR CENTRE  
AS EXISTING PLAN

**B** EXISTING VISITOR CENTRE  
PROPOSED ADAPTED PLAN



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REV	REVISION	DATE
P5	UPDATED JAN 2020	
P4	UPDATED NOV 2019	
P3	UPDATED OCT 2019	
P2	UPDATED SEPT 2019	
P1	UPDATED SEPT 2019	
A	APPROVED JULY 2019	



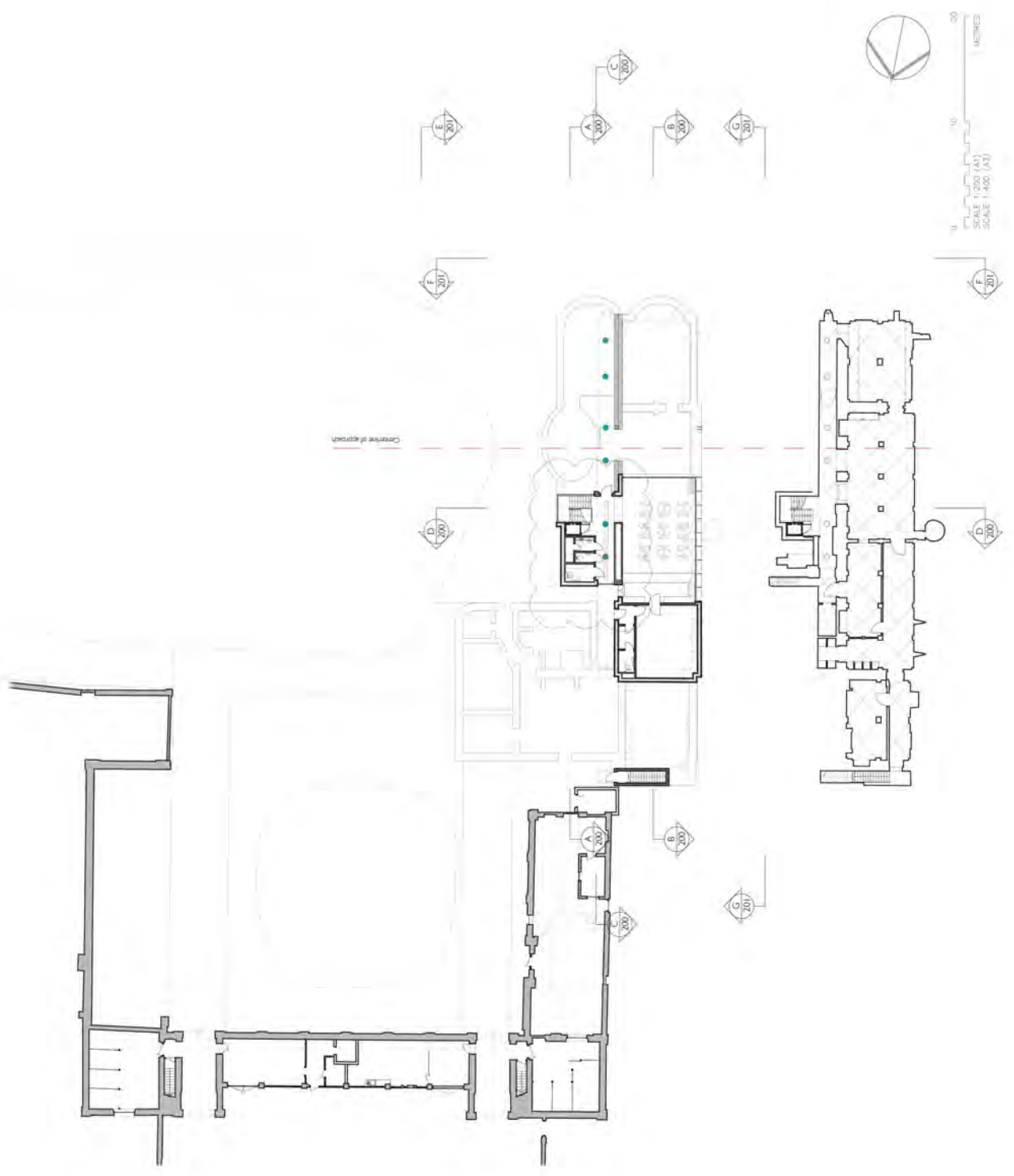
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PROJECT  
HILNGDON  
CRANFORD PARK

TITLE  
GROUND FLOOR PLAN  
WITH CELLAR  
AS PROPOSED

TOWN	DATE	SCALE	CHARGE
NGCH	May 19	1:200@A1	
		SCALE 1:400 (A3)	
		PROJECT REF	
		595401	
		PL-101	P5



**A** GROUND FLOOR PLAN  
101 AS PROPOSED

**B** CELLAR PLAN  
101 AS PROPOSED

77.	UPDATED	JAN 2020
76.	UPDATED	JAN 2020
75.	UPDATED	JAN 2020
74.	UPDATED	NOV. 2019
73.	UPDATED	OCT. 2019
72.	UPDATED	SEPT 2019
71.	UPDATED	SEPT 2019



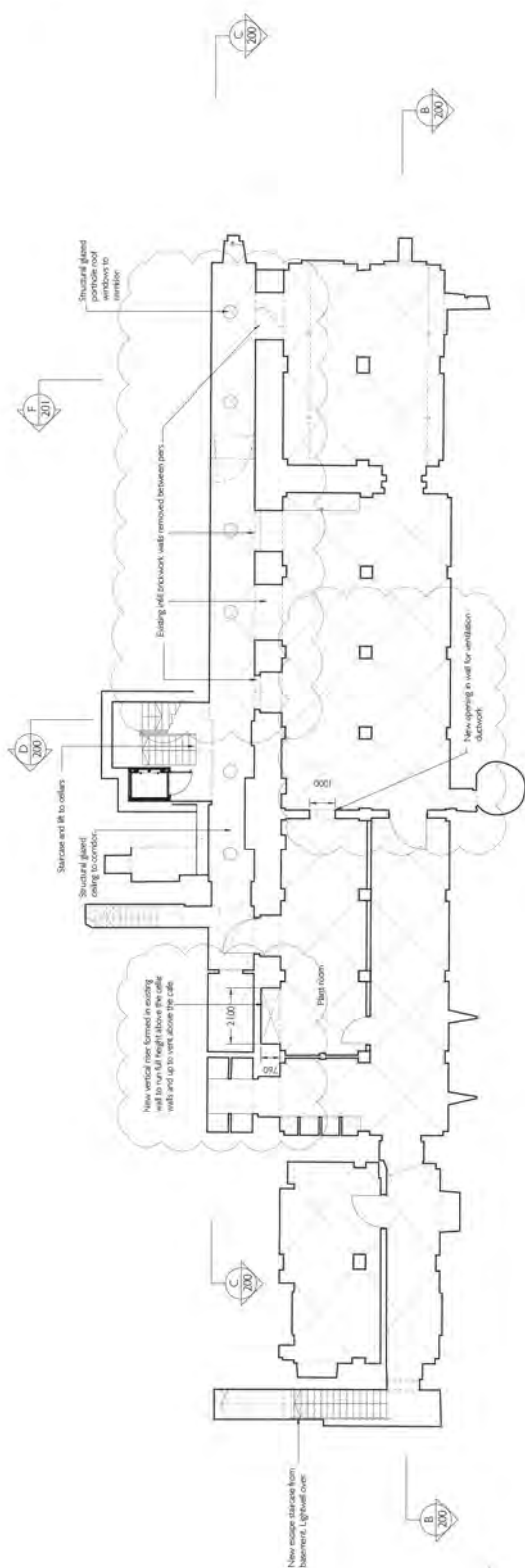
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FORD  
& PARTNERS  
CHARTERED  
ARCHITECTS  
SURVEYORS

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TEL 020 8659 3250 • FAX 020 8659 3146  
E-MAIL: [info@thomsonfont.co.uk](mailto:info@thomsonfont.co.uk)

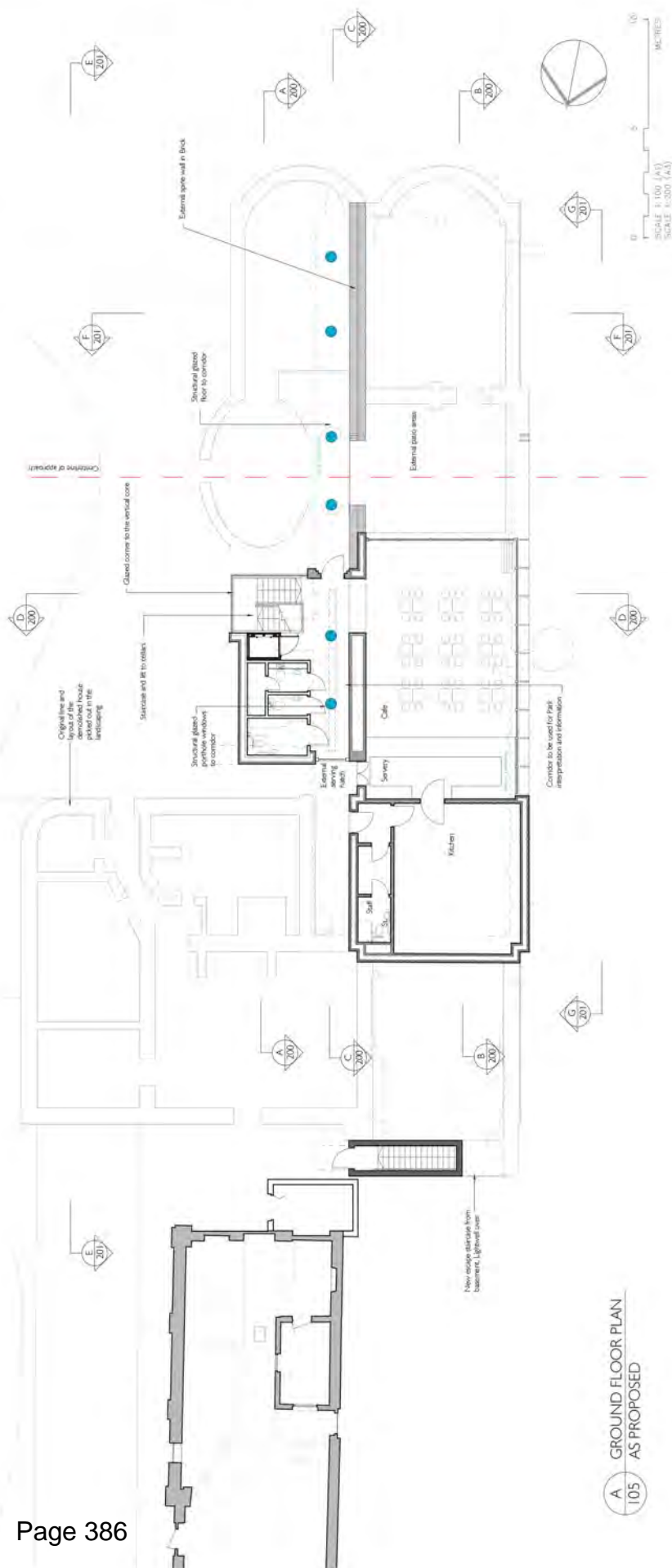
PROJECT  
HILINGDON  
CRANFORD PARK

TITLE  
GROUND FLOOR PLAN  
WITH CELLAR  
AS PROPOSED

NAME	DATE	SALES	CHGZED
NGH	May 19	1:100@AI	
PROJECT REF		CHG. No.	REV
535401		PI-105	P7



B CELLAR FLOOR PLAN  
105 AS PROPOSED



A GROUND FLOOR PLAN  
105 AS PROPOSED

DO NOT SCALE DIMENSIONS. THE CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND ANY DISCREPANCY IS TO BE REFERRED TO THE ARCHITECT

Rev. Revision  
Date 19 Dec 19

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TEL 020 8697 3235 • FAX 020 8697 3116  
E-MAIL: [office@thomasford.co.uk](mailto:office@thomasford.co.uk)

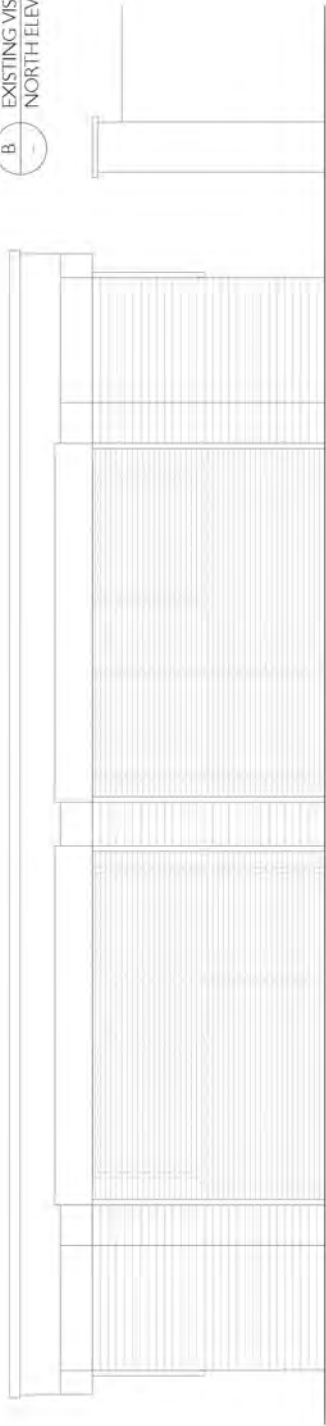
PROJECT  
HILLINGDON  
CRANFORD PARK

EXISTING VISITOR CENTRE ELEVATIONS				
Sheet	Date	Scale	Checked	By
M	DEC 19	1:25		
Project Ref	Doc No	Rev		PI
535401	EX-401			

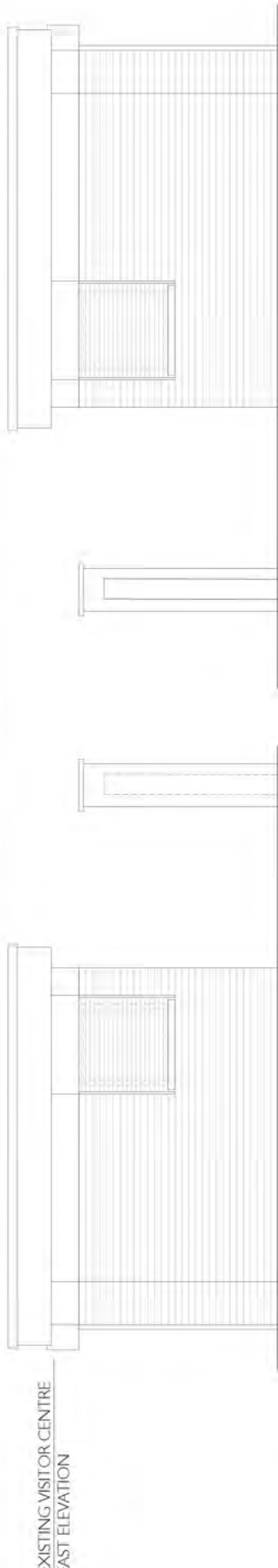
A EXISTING VISITOR CENTRE  
NORTH ELEVATION



B EXISTING VISITOR CENTRE  
NORTH ELEVATION

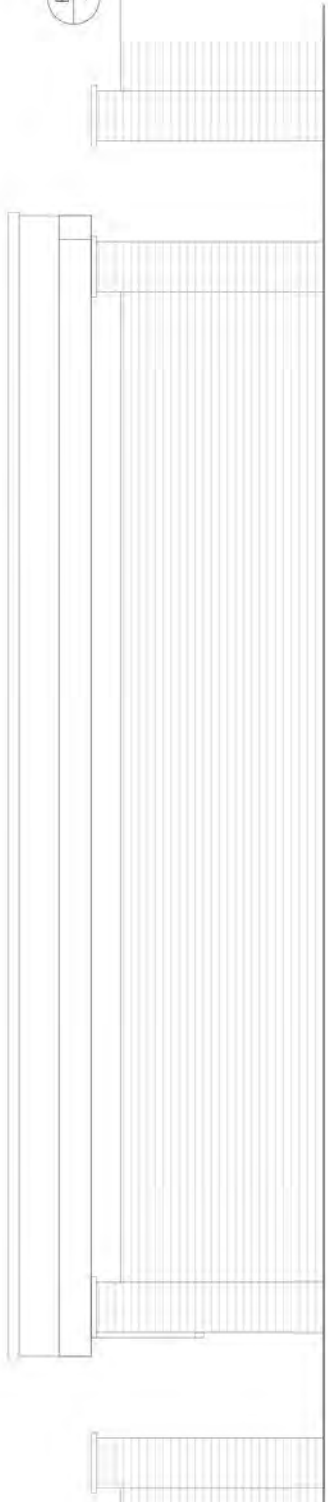


D EXISTING VISITOR CENTRE  
WEST ELEVATION



C EXISTING VISITOR CENTRE  
EAST ELEVATION

E EXISTING VISITOR CENTRE  
NORTH ELEVATION



0 0.5 1 1.5 2  
METRES  
SCALE 1:25 (A1)  
SCALE 1:50 (A3)

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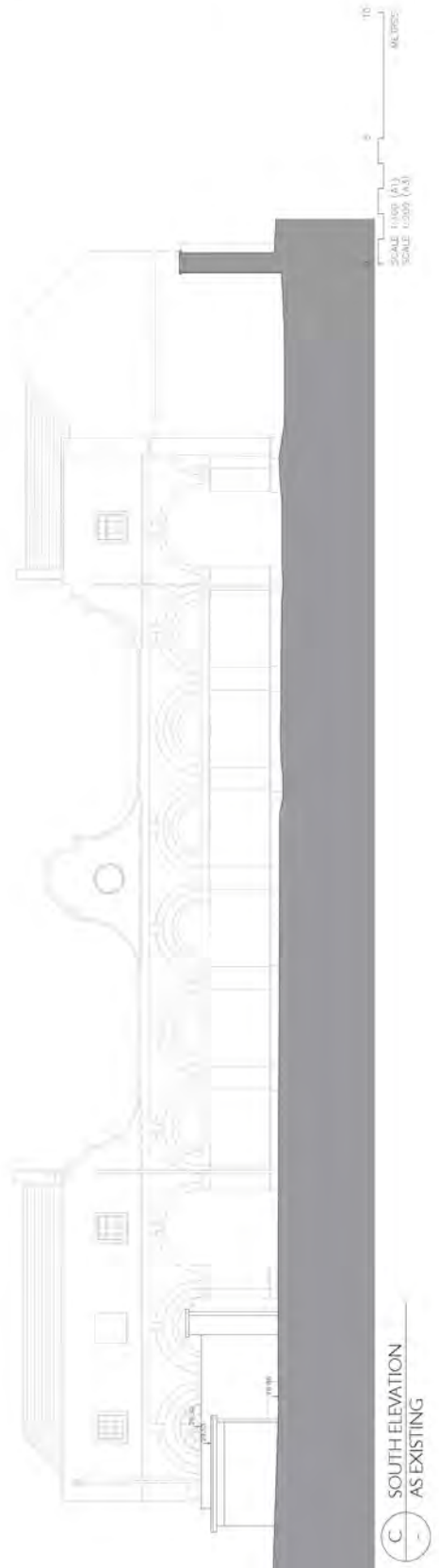
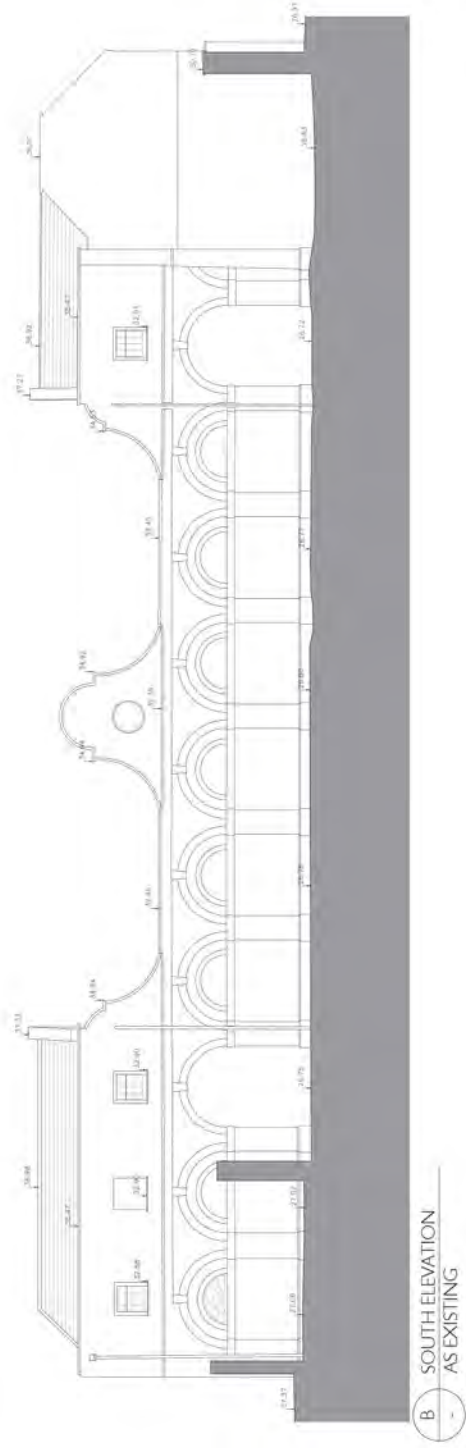
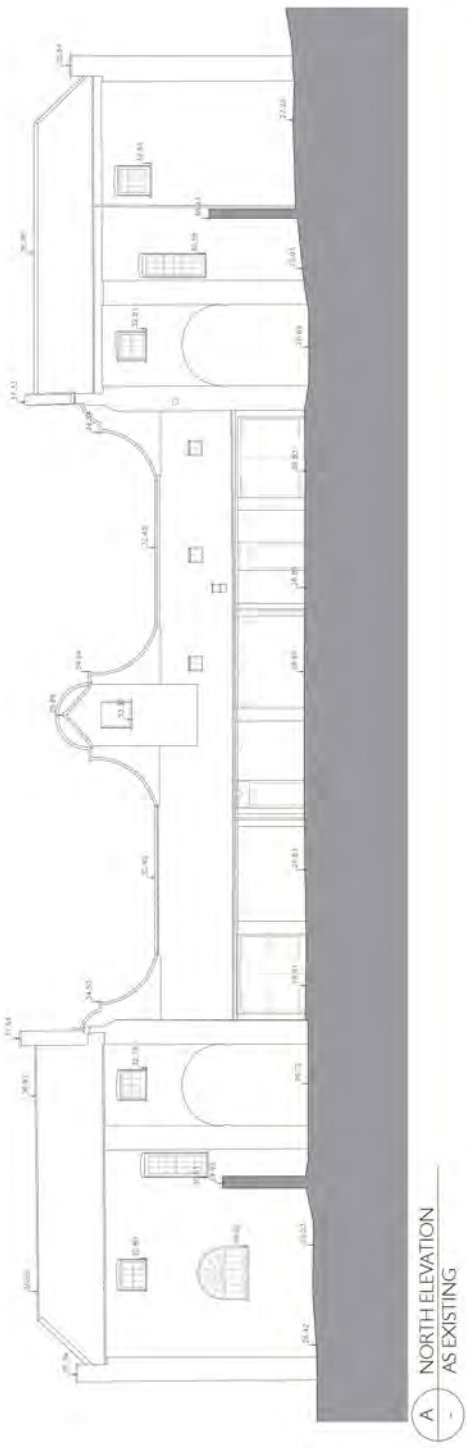
REV	DESCRIPTION	DATE
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SURVEYORS  
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STOCKLEY • LONDON • SE25 4QH  
TEL 020 869 3325 • FAX 020 869 3116  
E-MAIL: [info@thomasford.co.uk](mailto:info@thomasford.co.uk)

PROJECT  
HILINGTON  
CRANFORD PARK

REVISION	DATE	BY	CHECKED
1	19/01/19	1:1000(A)	1:1000(A)
2	19/01/19	1:1000(A)	1:1000(A)
3	19/01/19	1:1000(A)	1:1000(A)
4	19/01/19	1:1000(A)	1:1000(A)
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7	19/01/19	1:1000(A)	1:1000(A)
8	19/01/19	1:1000(A)	1:1000(A)
9	19/01/19	1:1000(A)	1:1000(A)
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SECTION AA  
200 AS PROPOSED



B	SECTION BB
200	AS PROPOSED



C SECTION CC  
200 AS PROPOSED



D SECTION DD  
200 AS PROPOSED



LOTTERY FUNDED

**THOMAS  
FORD**  
& PARTNERS  
CHARTERED  
ARCHITECTS  
SURVEYORS

177 KIMDALE  
STONHAM • LONDON • SE26 8JH  
TEL: 020 8659 3150 • FAX: 020 8659 3146  
EMAIL: [info@thorvald.co.uk](mailto:info@thorvald.co.uk)

PROJECT  
HILINGDON  
CRANFORD PARK

TITLE	PAVILION SECTIONS A - D AS PROPOSED
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COMPANY	DATE	SCALE	CHARTER
NCH	May 19	1:100,000	100
PROJECT NO.		CHART. NO.	PT
535401		PL-200	



DO NOT SCALE DRAWINGS. THE CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND DISCREPANCY IS TO BE REFERRED TO THE ARCHITECT

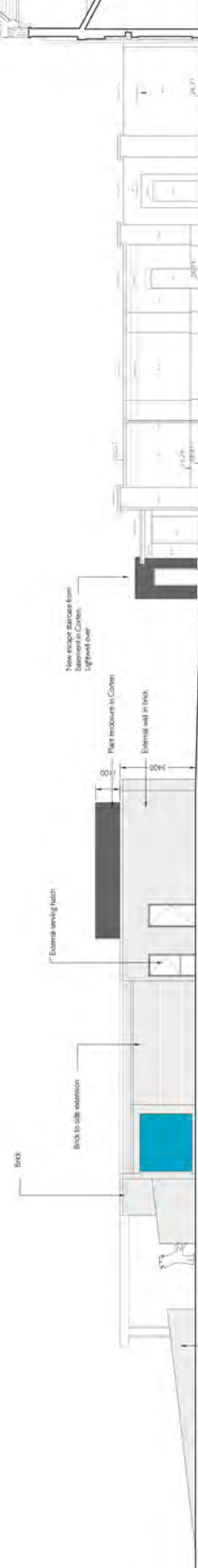


REV.	DESCRIPTION	DATE
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P5.	UPDATED OCT 2019	
P6.	UPDATED SEPT 2019	
P7.	UPDATED SEPT 2019	

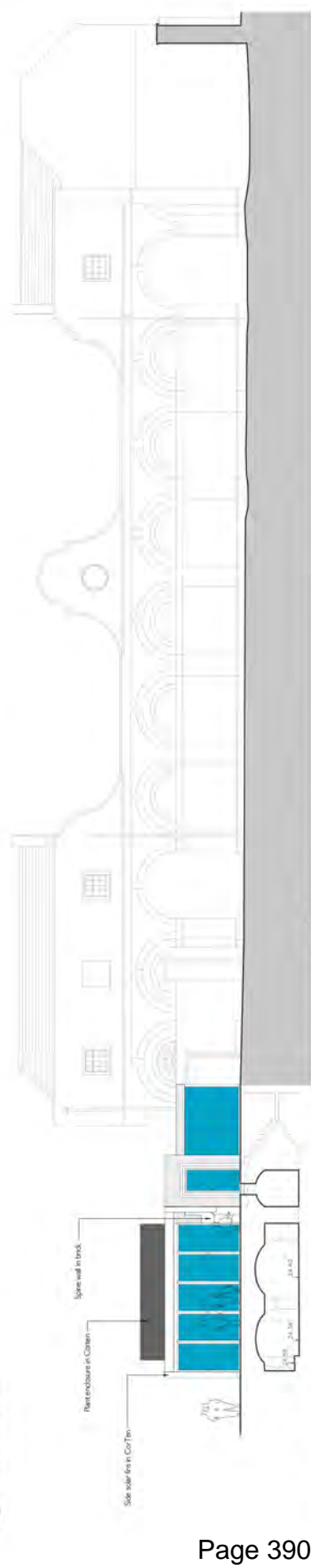


**THOMAS FORD & PARTNERS**  
**CHARTERED ARCHITECTS**  
**SURVEYORS**  
 177 KIRKDALE  
 STOBHAMPTON • LONDON • SE26 4QH  
 TEL: 0203 609 2126 • FAX: 0203 609 2146  
 E: info@thomasford.co.uk

PROJECT	HILNGOOD CRANFORD PARK
TITLE	SECTIONS EE, FF
AS PROPOSED	
TOWN	INCH
DATE	May 19
SCALE	1:100 (A1)
DISC. NO.	PL-201
CHECKED	P3
BY	535401



**E** SECTION EE  
 201 AS PROPOSED



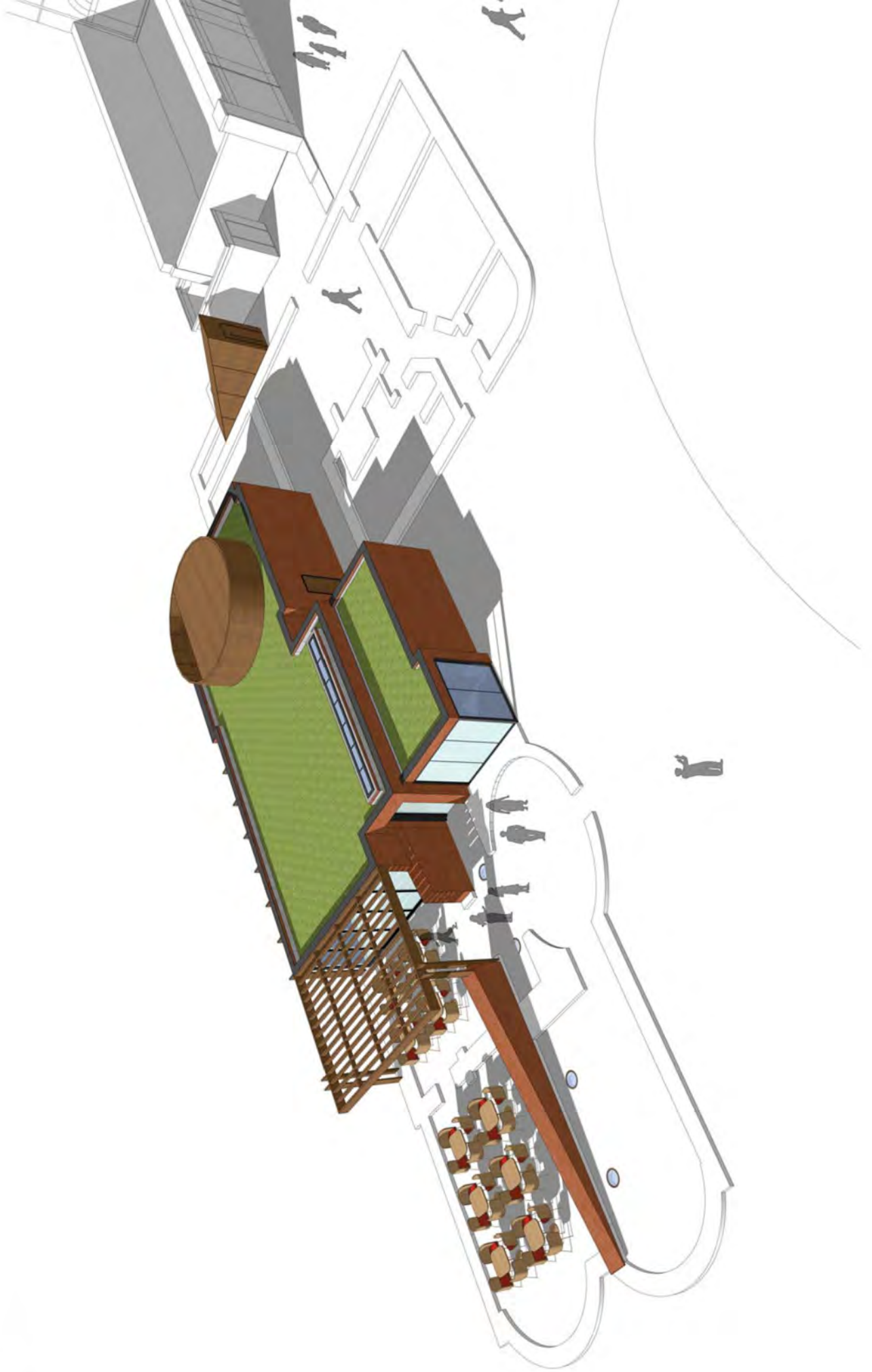
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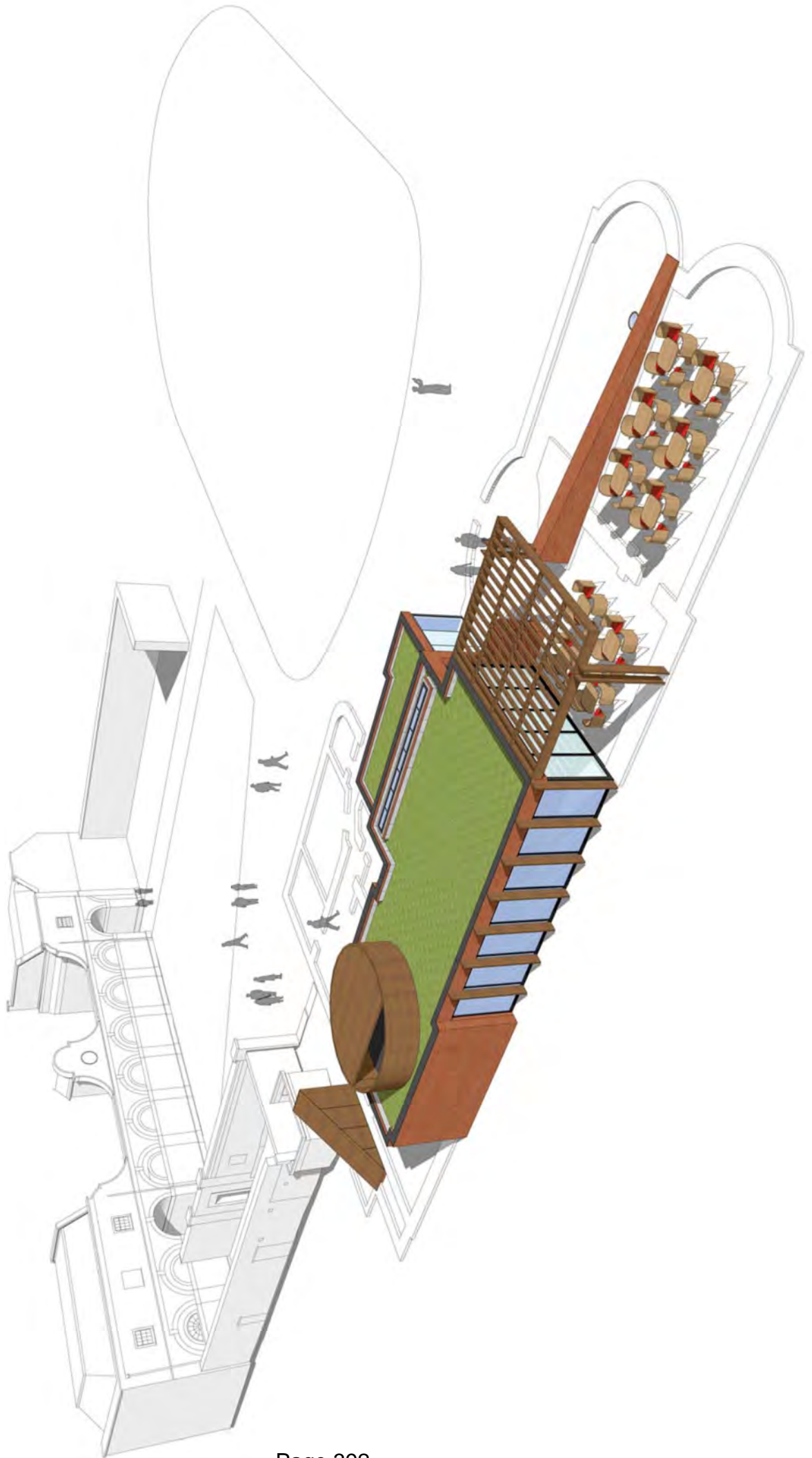


**G** SECTION GG  
 201 AS PROPOSED

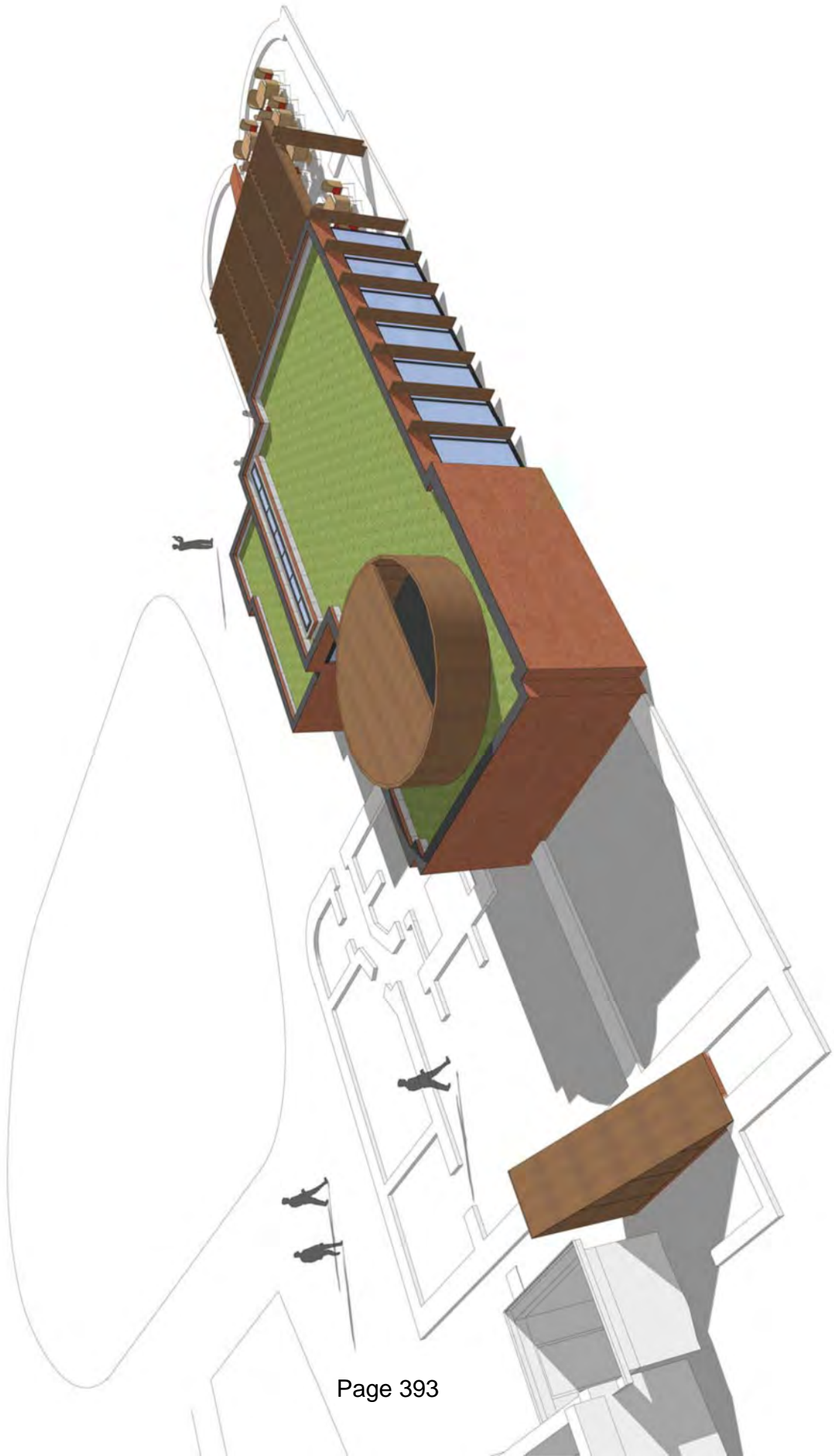


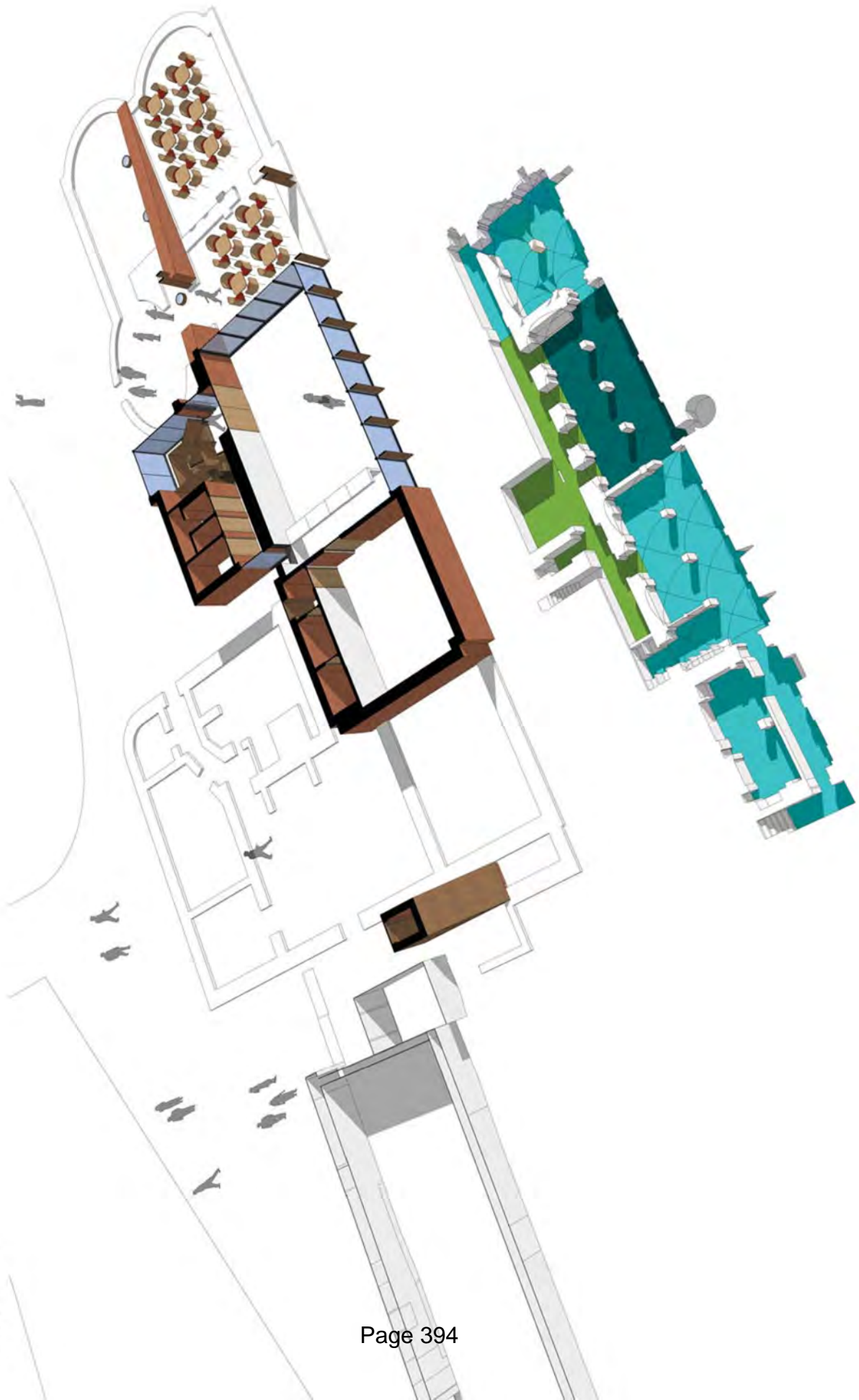
**H** SECTION HH  
 201 AS PROPOSED

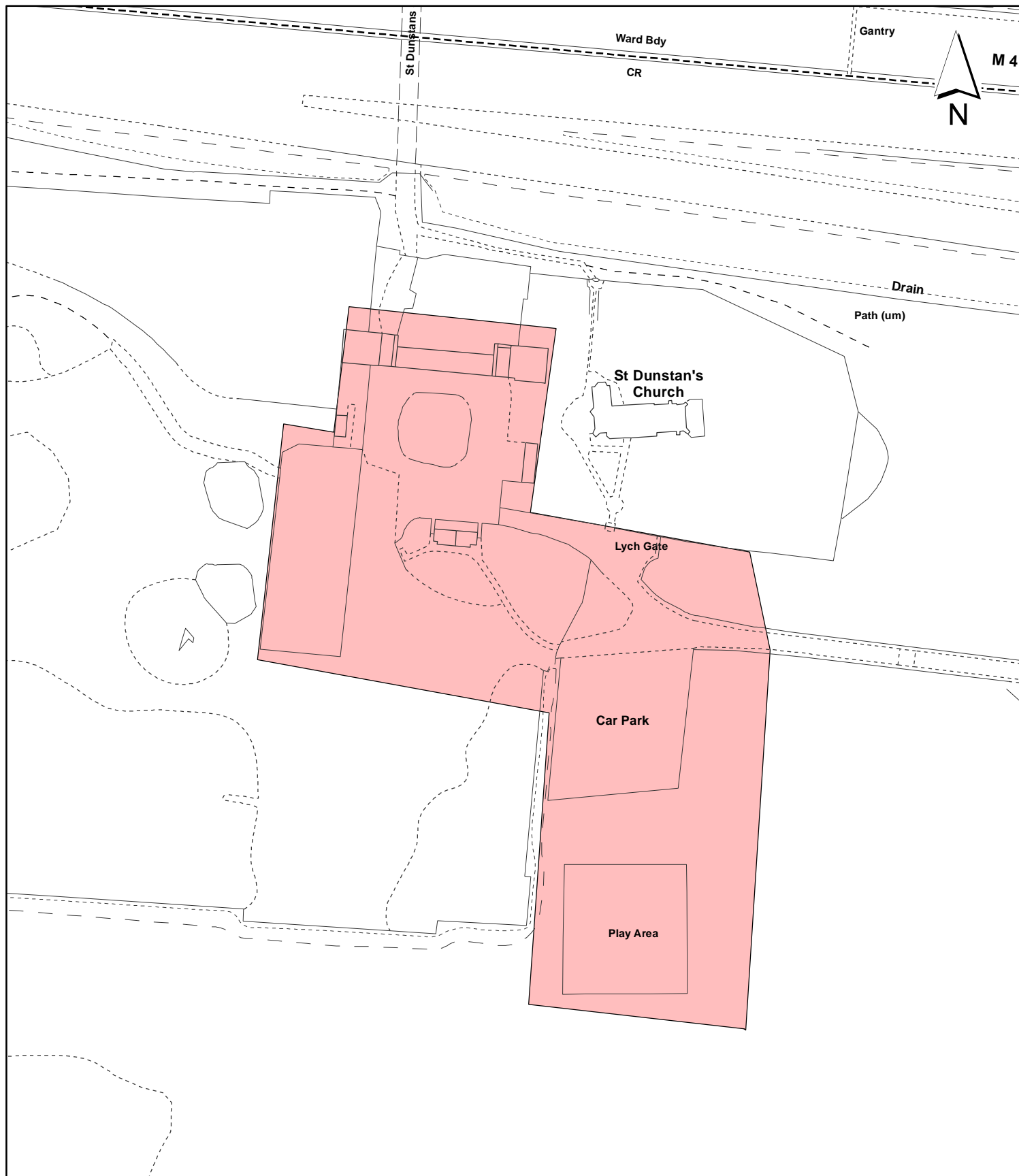












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Site Address:

**Cranford Park  
The Parkway  
Hayes**

Planning Application Ref:

**14009/APP/2019/4088**

Scale:

**1:1,250**

Planning Committee:

**Major** Page 395

Date:

**February 2020**

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

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



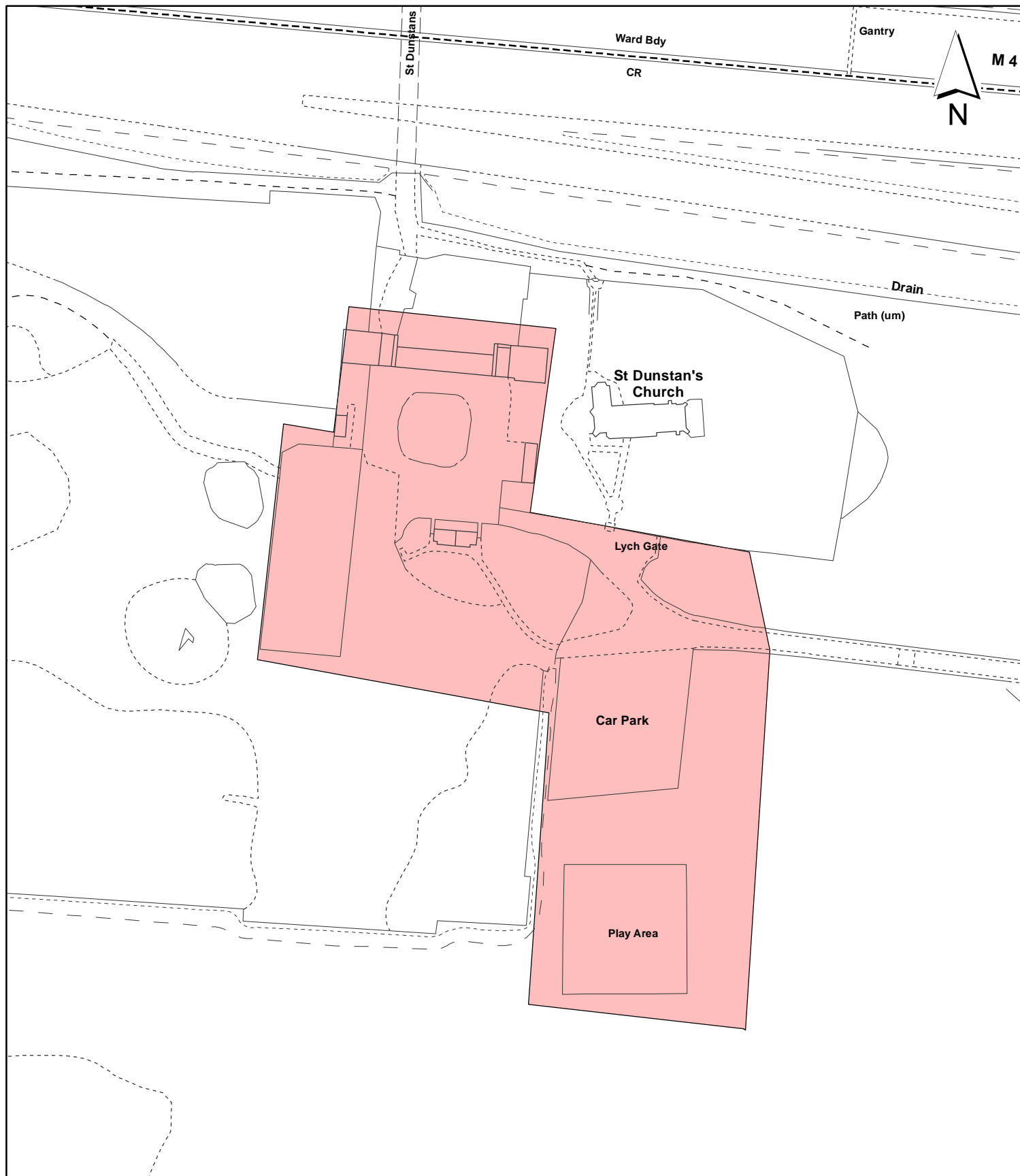
**HILLINGDON**  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address** CRANFORD PARK THE PARKWAY HAYES

**Development:** The erection of a detached cafe building, outdoor seating area with access, and minor alterations to the listed cellars beneath, minor alterations to the listed stable block with change of use to B1, extension to the existing car park, alterations to the existing information centre building and construction of bin store including all associated external works (application for listed building consent).

**LBH Ref Nos:** 14009/APP/2019/4090



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Site Address:

**Cranford Park  
The Parkway  
Hayes**

Planning Application Ref:

**14009/APP/2019/4090**

Planning Committee:

**Major** Page 397

Scale:

**1:1,250**

Date:

**February 2020**

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

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address** BRIDGE HOUSE, RIVERVIEW HOUSE AND WATERSIDE HOUSE  
OXFORD ROAD UXBRIDGE

**Development:** Section 73 application to vary the approved plans list condition of application reference 40050/APP/2017/2438 dated 01/09/2017 for (Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to residential units (Class C3) together with ancillary car parking, cycle storage and waste and recycling storage (as amended by application reference 40050/APP/2019/3869 dated 21/01/20).

The amendments to the approved plans propose: No longer including the 6th floor of Bridge House (7 x 1 bedroom units) and allow the change in the mix of units at Bridge House from 9 x Studios and 114 x 1 bedroom units to 16 x studios, 43 x 1 bedroom units and 56 x 2 bedroom units.Â

**LBH Ref Nos:** 40050/APP/2019/1865

**Date Plans Received:** 04/06/2019  
**Date Application Valid:** 23/01/2020

**Date(s) of Amendment(s):** 03/06/2019



Key Point

Scale 1:750 @ A1

Issue Record	By	Chk Date
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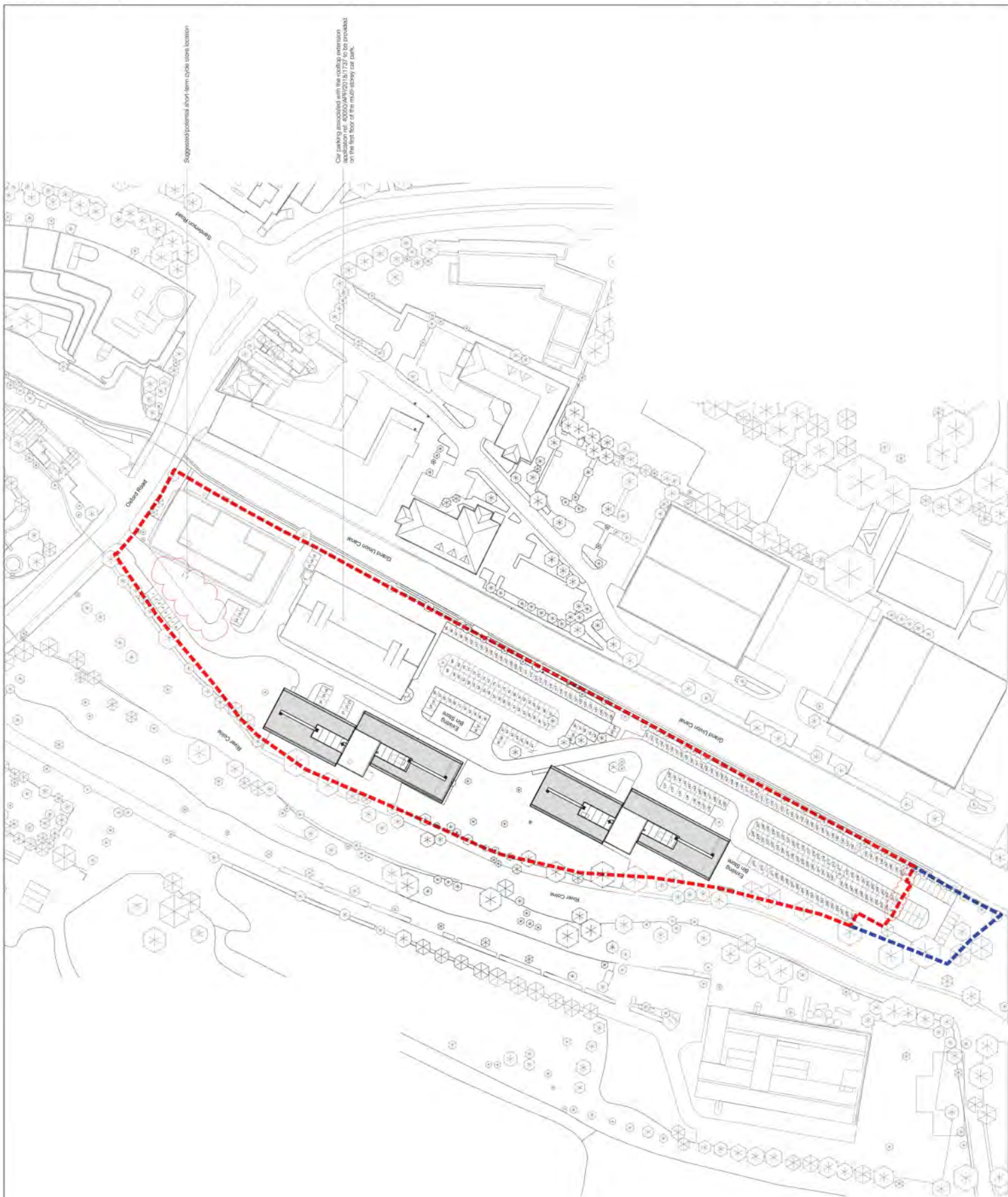
Issue Record	By	Chk Date
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Site plan

Status  
For information

Patel Taylor  
48 Rawstome Street  
London EC1V 7ND  
T +44 (0)20 7278 2323  
[www.patelTaylor.co.uk](http://www.patelTaylor.co.uk)

Patel Taylor





Colour Code	studio / 1 bed	2 beds
		
		

Issue Record	By	Chk Date
--------------	----	----------

Title
Bridge House
Typical floor plan

Status

Patel Taylor

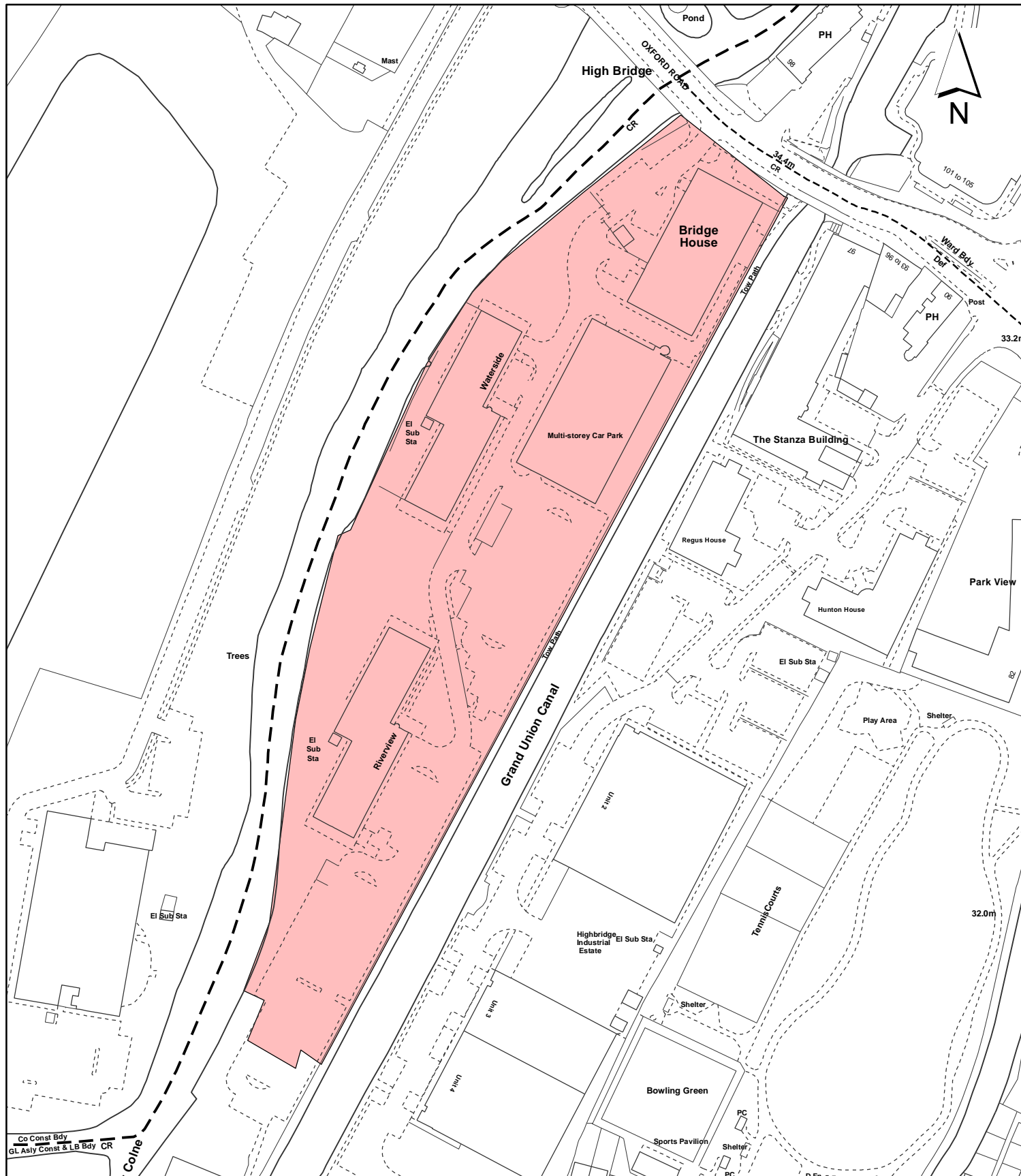
Patel Taylor  
48 Rawstone Street  
London EC1V 7ND  
T +44 (0)20 7278 2323  
[www.pateiltaylor.co.uk](http://www.pateiltaylor.co.uk)

Patel Taylor









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Site boundary

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Site Address:

**Bridge House, Riverview House & Waterside House  
Oxford Road**

Planning Application Ref:

**40050/APP/2019/1865**

Planning Committee:

**Major Page 402**

Scale:

**1:1,850**

Date:

**February 2020**

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

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address** 19-22 CHIPPENDALE WAYE UXBRIDGE MIDDX

**Development:** Erection of a block of 12 No. flats comprising of 7x1 bed, 4x2 bed and 1x3 bed apartments with associated parking, landscaping, access and amenity.

**LBH Ref Nos:** 67544/APP/2019/1978

**Date Plans Received:** 11/06/2019

**Date(s) of Amendment(s):** 11/06/2019

**Date Application Valid:** 02/08/2019



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IF IN DOUBT ASK FOR CONFIRMATION.



**PROPOSALS**

19 - 23  
CHIPPENDALE WAY  
LUXURIDGE  
UB8 1QJ

**KEY**

- Existing trees to remain
- Existing trees to be removed
- Indicative landscaping
- Indicative tree planting

**REVISIONS**

NO.	DESCRIPTION	DATE
1	ISSUED FOR PERMIT	19/05/2024

**AMASIA ARCHITECTS LTD**

19 - 23  
CHIPPENDALE WAY  
LUXURIDGE  
UB8 1QJ

**KEY**

- Existing trees to remain
- Existing trees to be removed
- Indicative landscaping
- Indicative tree planting

**KEARNS**

19 - 23  
CHIPPENDALE WAY  
LUXURIDGE  
UB8 1QJ

**KEY**

- Existing trees to remain
- Existing trees to be removed
- Indicative landscaping
- Indicative tree planting

**AMASIA ARCHITECTS LTD**

19 - 23  
CHIPPENDALE WAY  
LUXURIDGE  
UB8 1QJ

**KEY**

- Existing trees to remain
- Existing trees to be removed
- Indicative landscaping
- Indicative tree planting

**KEARNS**

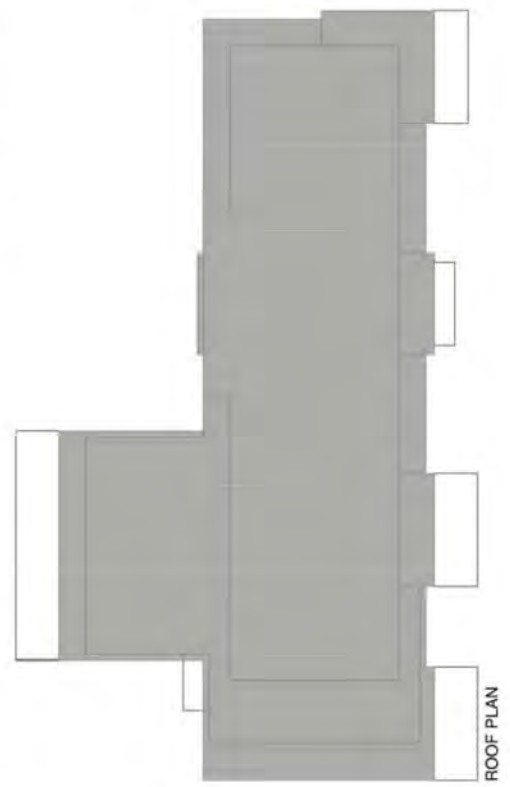
19 - 23  
CHIPPENDALE WAY  
LUXURIDGE  
UB8 1QJ

**KEY**

- Existing trees to remain
- Existing trees to be removed
- Indicative landscaping
- Indicative tree planting

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**TOTALS**  
 AREA: 725m<sup>2</sup>  
 1 BEDS: 7No.  
 2 BEDS: 4No.  
 3 BEDS: 1No.  
**UNITS OVERALL: 12No.**

**BALCONY AMENITY**  
 AREA: 56m<sup>2</sup>

<p><b>AMASIA</b> ARCHITECTS LTD</p>		<p><b>PROPOSALS</b></p>	
<p>19 - 22 CHIPPENDALE WAY UXBRIDGE UB8 1QJ</p>		<p><b>KEARNS</b></p>	
<p>1:100 A1 50 MAY 19</p>		<p>FLOOR PLANS</p>	
<p>AAAL-19-152-903</p>		<p>C</p>	





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SOUTH EAST ELEVATION

SOUTH WEST ELEVATION



NORTH WEST ELEVATION

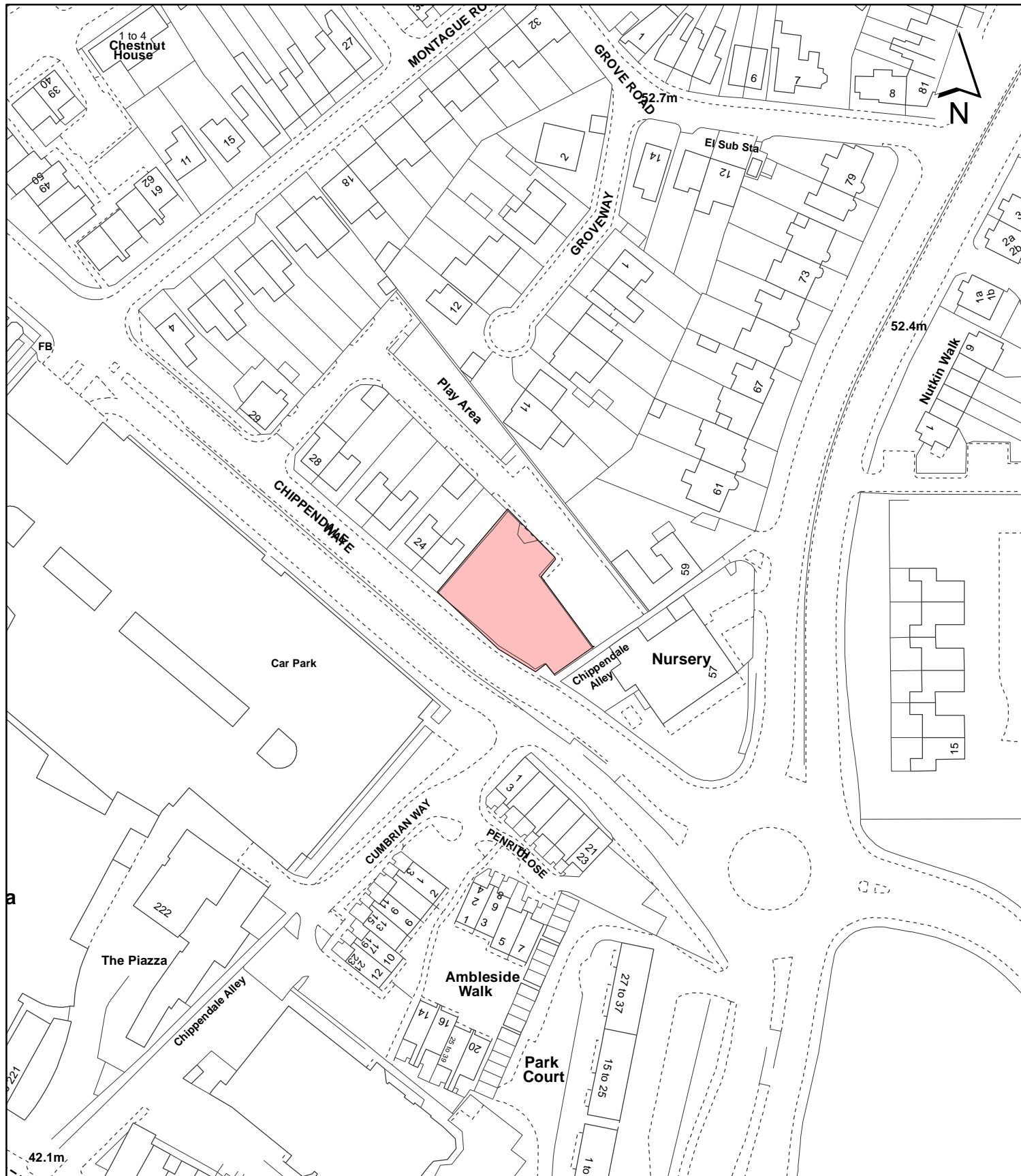
NORTH EAST ELEVATION

NO.	REVISIONS	DATE
1	PROPOSALS	
19 - 22 CHIPPENDALE WAY UXBRIDGE UB8 1QJ		
AMASIA ARCHITECTS LTD		
ALBURY ESTATE CHIPPENDALE UXBRIDGE MIDGLES GL5 2LS T 01845 200794		
KEARNS		
NO.	REVISIONS	DATE
1-100	A1 SG	MAY 19
ELEVATIONS		
AAL-19-152-P04 A		

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Site Address:

**19 - 22 Chippendale Way**

Planning Application Ref:

**67544/APP/2019/1978**

Planning Committee:

**Major Page 408**

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON



## **Report of the Head of Planning, Transportation and Regeneration**

**Address** BATTLE OF BRITAIN MUSEUM AND VISITOR CENTRE WREN AVENUE  
UXBRIDGE

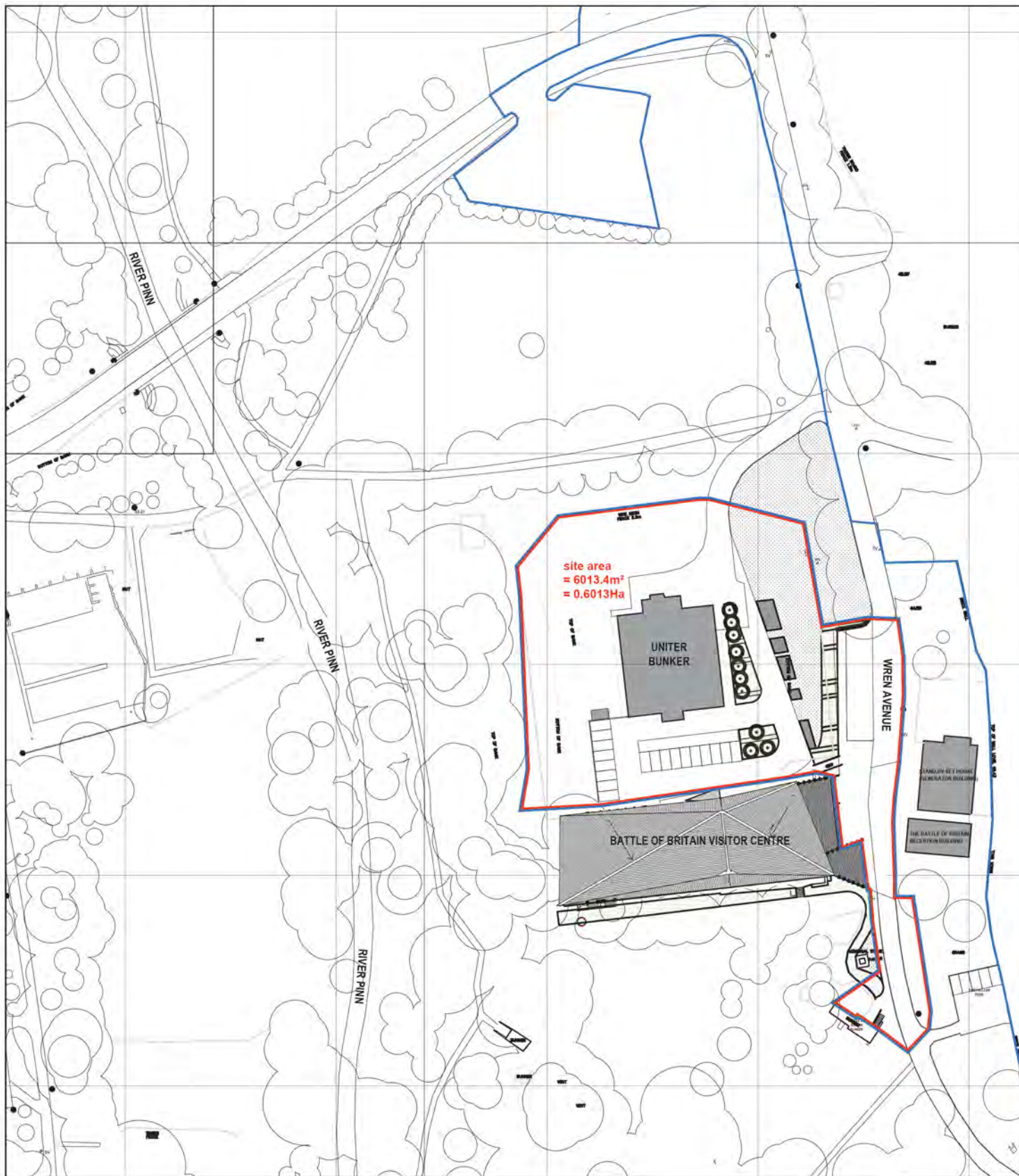
**Development:** Proposed landscaping improvement works including surface water flood mitigation using new rain gardens, reshaping of existing bund, new tree planting to improve setting and new car park spaces and all associated works.

**LBH Ref Nos:** 585/APP/2019/3868

**Date Plans Received:** 29/11/2019

**Date(s) of Amendment(s):**

**Date Application Valid:** 29/11/2019



0 25 50 75 100 125m  
Scale 1:1250



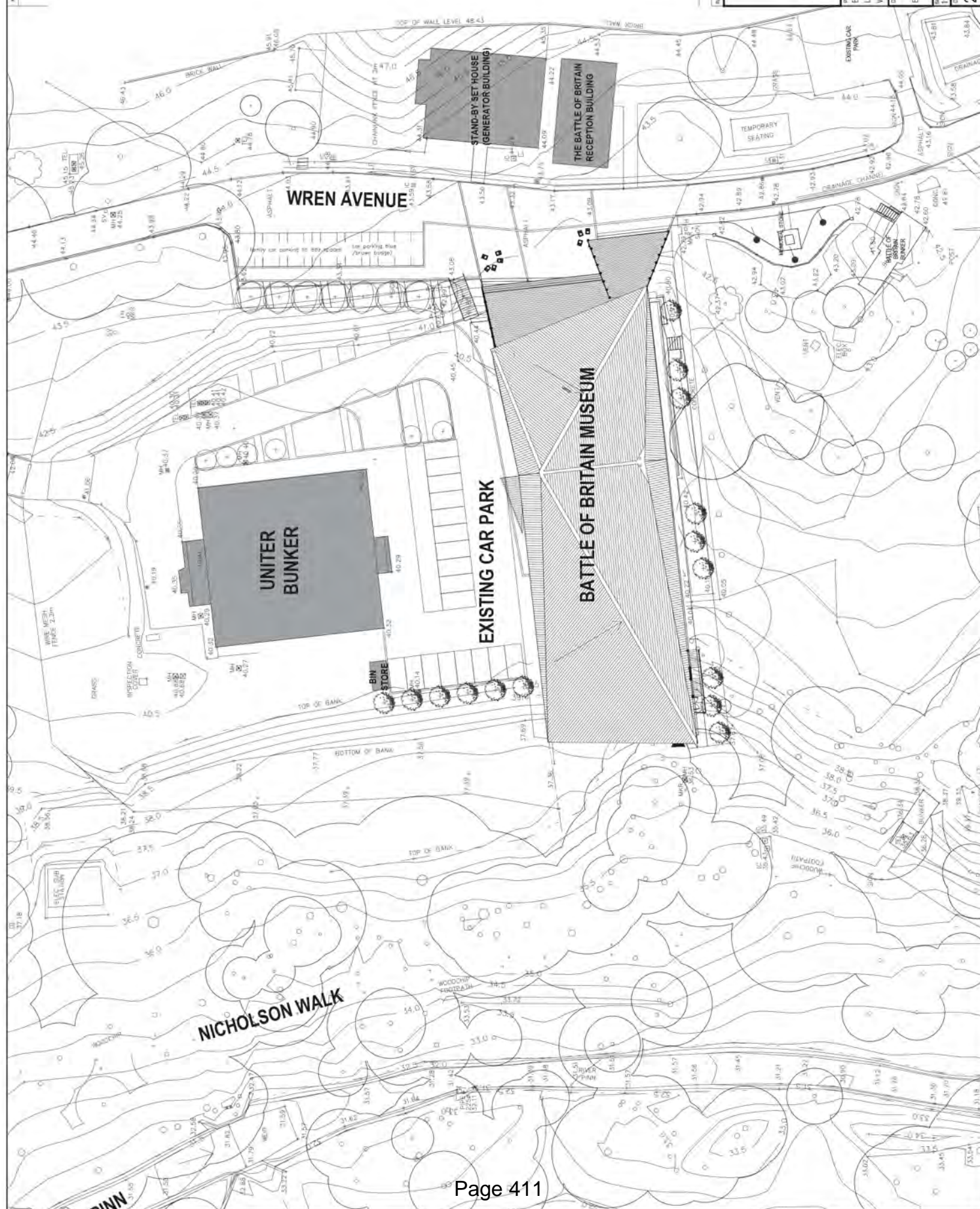
**HILLINGDON**  
LONDON

RESIDENTS SERVICES, CAPITAL PROGRAMME  
2E/10, CIVIC CENTRE, UXBRIDGE, UB8 1UW  
Tel: 01895 250 111  
Fax: 01895 277 224

NOTES: - DO NOT SCALE FROM THIS DRAWING. The Contractor must verify all dimensions at the site before setting out, commencing work, or making any shop drawings. Any discrepancies must be reported to the Contract Administrator before proceeding.

Rev	Revision notes	Initials	Date
-	-	-	-
Project	BATTLE OF BRITAIN MUSEUM & VISITOR CENTRE, LANDSCAPE IMPROVEMENT	Drawn by	DB
Description	WORKS, WREN AVENUE, UXBRIDGE. UB10 0GG	Checked by	
Scale		Date	
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Drawing No.		Rev.	
2019/D/295/P/01			



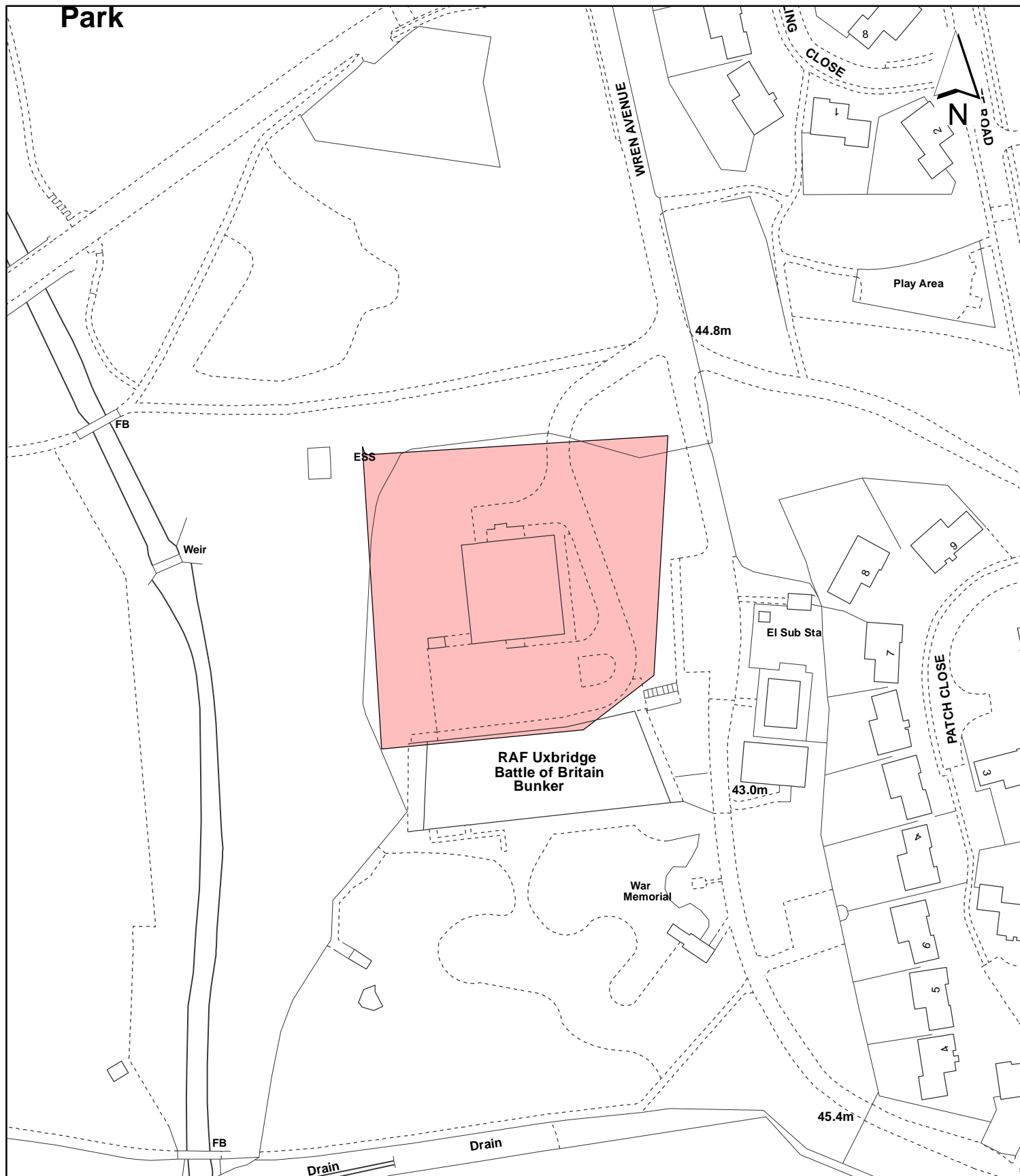












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Site Address:

**Battle of Britain Museum  
and Visitor Centre  
Wren Avenue**

Planning Application Ref:

**585/APP/2019/3868**

Planning Committee:

**Major Page 414**

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address** THE ARENA BENNETSFIELD ROAD STOCKLEY PARK  
**Development:** Alterations to car parking and erection of 2 substations storage/plant room  
**LBH Ref Nos:** 37800/APP/2019/3278

**Date Plans Received:** 04/10/2019      **Date(s) of Amendment(s):**  
**Date Application Valid:** 22/10/2019



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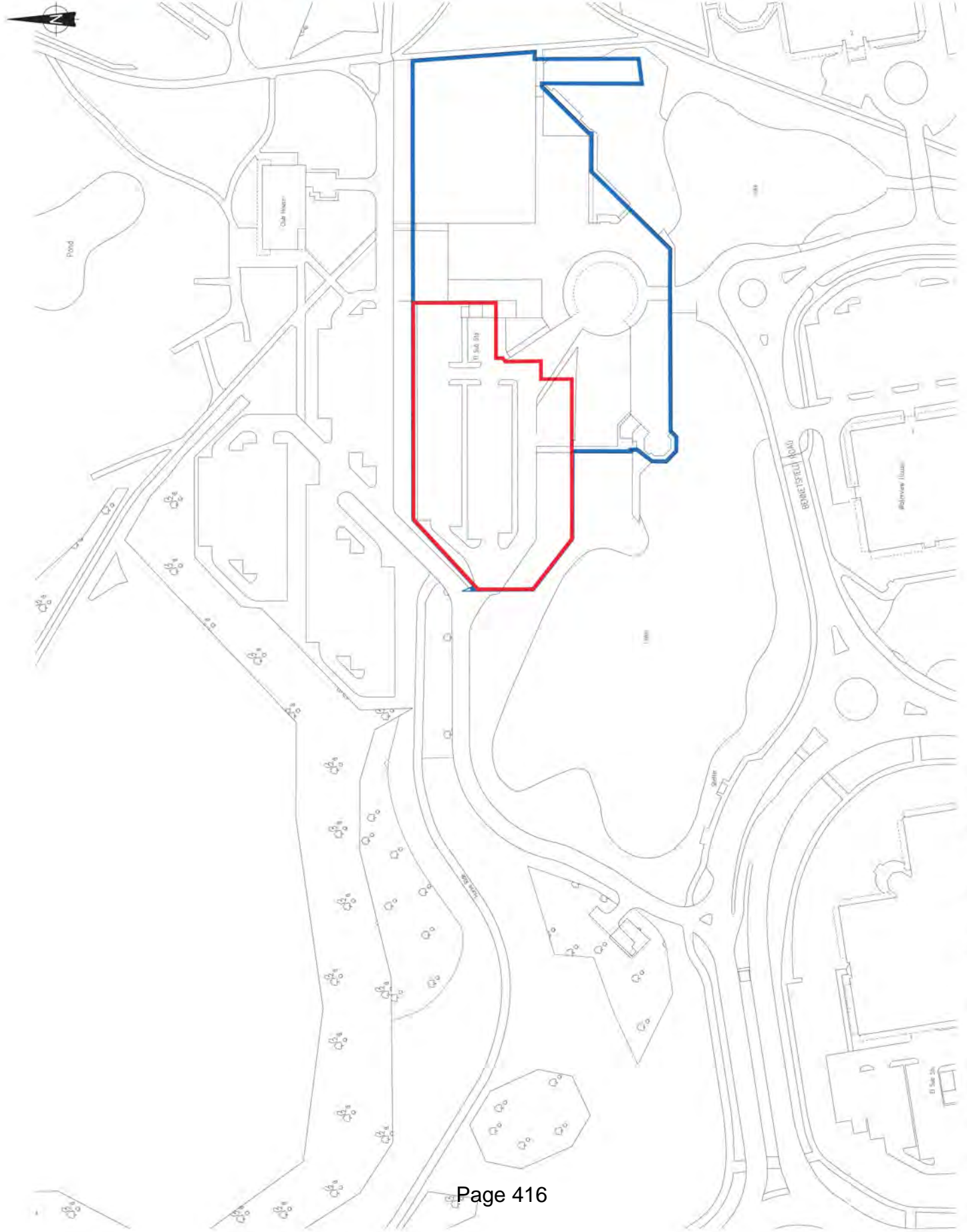
**DRAWING TO BE READ IN COLOUR**

**SITE ADDRESS:**  
CAR PARK  
THE ARENA  
STOCKLEY PARK, UXBRIDGE  
UB11 1AA

**LEGEND:**

RED LINE APPLICATION BOUNDARY  
WITHIN APPLICANTS OWNERSHIP

ADJACENT LAND WITHIN APPLICANTS OWNERSHIP



D00 ISSUED FOR PLANNING 03.10.19

Revision Description Date

**URBANEDGE**  
architecture / landscape / masterplanning

Client: BBC PENSION TRUST LIMITED

Project: TRAVELODGE STOCKLEY PARK UXBRIDGE

Drawing: RELCOATED SUBSTATION & CAR PARKING DETAILS SITE LOCATION PLAN

Scale: 1:1250  
Date: OCT 19  
Project No: 1609 URB SS[08] 00 01  
Drawing No: D00  
Revision: D00

**PLANNING**



**DRAWING TO BE READ IN COLOUR**



**TOTAL 160 SPACES**  
12 OF WHICH ARE ACCESSIBLE

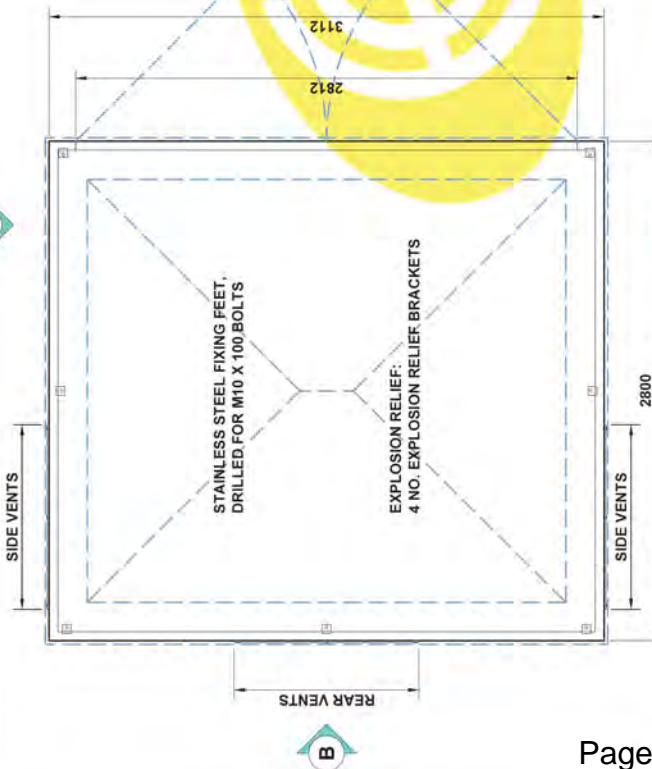
REFER TO URB-HT TL 00 03-D02  
APPROVED UNDER APPLICATION  
REFERENCE

**37800\_APP\_2016\_1430 FOR  
ORIGINAL CAR PARK DETAILS**

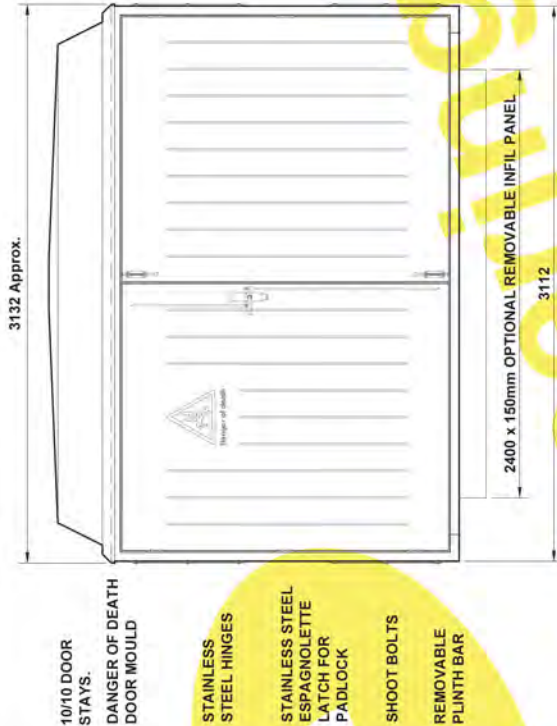


## PLANNING

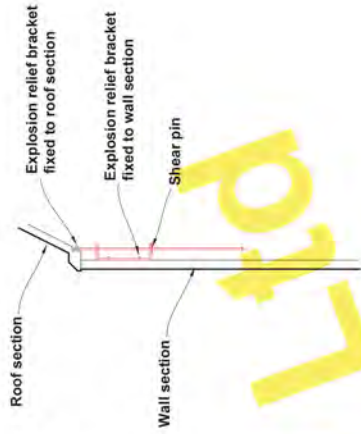
## Plan View Elevation



## Elevation (A) (front)



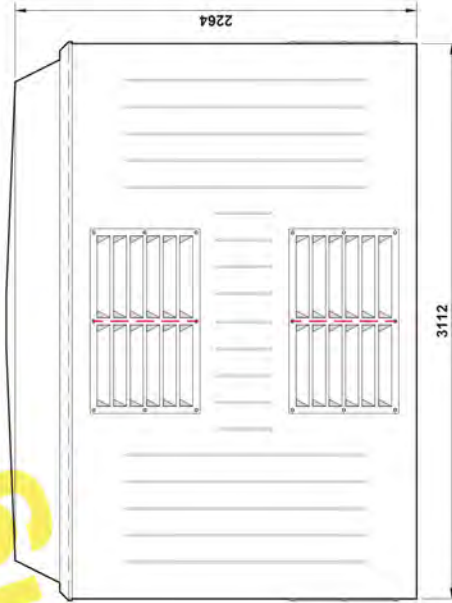
## Roof Fixing Detail



## Elevation (C) (l/h side)



## Elevation (B) (rear)



## Elevation (D) (r/h side)



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**Envico Engineering Limited**

Tel : 01792 794 619

Fax : 01792 793 532

Nantylfin Road (South), Enterprise park, Llanhamlet  
Swansea, SA7 9RG, South Wales.

INTERNAL WIDTH : 3002mm

INTERNAL DEPTH : 2690mm

INTERNAL HEIGHT : 2250mm

APPROX. WEIGHT : 500kg

Date : 30/07/2018

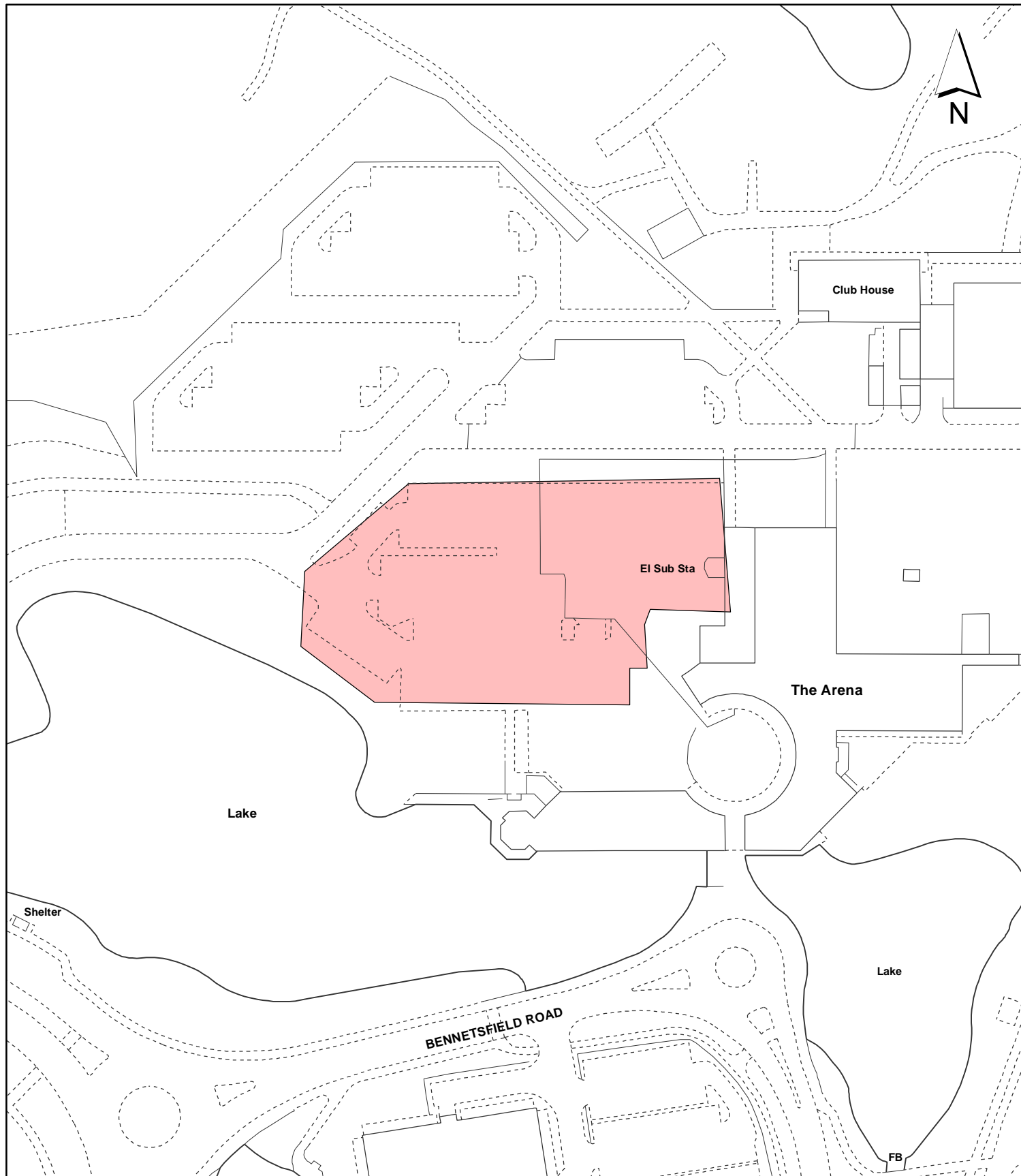
Drawn By : D O'Malley

GRP HOUSING : TRANSFORMER TYPE TR18

Drawing Scale : Not To Scale

Drawing No : TR18 SSE

Rev :



# Notes:

 Site boundary

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Site Address:

**The Arena  
Bennetsfield Road  
Stockley Park**

Planning Application Ref:

**37800/APP/2019/3278**

Planning Committee:

**Major** Page 419

Scale:

**1:1,250**

Date:

**February 2020**

**LONDON BOROUGH  
OF HILLINGDON**

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

## **Report of the Head of Planning, Transportation and Regeneration**

**Address** UXBRIDGE MORTUARY KINGSTON LANE HILLINGDON

**Development:** Proposed two single storey side and rear extension to existing Mortuary Building, relocation of existing rooftop plant, new rooftop plant, shielding housing for rooftop plant, installation of roof canopy, installation of 1100mm high safety railing to the rooftop, relocation of the fence and associated works.

**LBH Ref Nos:** 13102/APP/2019/3950

**Date Plans Received:** 09/12/2019  
**Date Application Valid:** 13/12/2019

**Date(s) of Amendment(s):** 31/01/2020





XD	20.02.20	TKA	Red line boundary amended.
XC	09.01.19	TKA	Adjacent cemetery shown as being in the Applicant's ownership.
XB	02.12.19	MBP	Boundary adjusted.
XA	02.12.19	MBP	PLANNING ISSUE.
Revision	Date	Revised by	
Revision History			

**hunters**

Space One Building  
1000 The Quadrant  
T 01908 8037 8000  
m@h.co.uk  
www.hunters.co.uk

**UXBRIDGE MORTUARY, LB HILLINGDON**  
Kingston Lane,  
Uxbridge, UB8 3PN



**SITE LOCATION PLAN**  
Issued for PLANNING

hunters project number:	scale:
M9805	1:1000@A4
client project number:	drawn by:
	MBP
	TKA

drawing title:	revised by:
M9805-HUN-DR-02-0001-SiteLocationPlan	

revision	date
XD	

0 10m 25m  
Scale 1:1000@A4





Key Plan 1:750@A1

SCHEDULE OF ACCOMMODATION			
FLOOR	OA (m <sup>2</sup> )	OA (m <sup>2</sup> )	
Existing Floor Area	252 (m <sup>2</sup> )		
North Extension	94 (m <sup>2</sup> )		
South Extension	55 (m <sup>2</sup> )		
Total Site Area	401 (m <sup>2</sup> )		
Number of Parking	8 (m <sup>2</sup> )		

1. All buildings are to be built on a level of 100.00m AOD. The ground level is shown on the site plan. The ground level is shown on the site plan. The ground level is shown on the site plan.

**hunters**

100% of the site is to be built on a level of 100.00m AOD. The ground level is shown on the site plan. The ground level is shown on the site plan. The ground level is shown on the site plan.

**LUXURIOUS MORTUARY, LB HILLINGDON**

100% of the site is to be built on a level of 100.00m AOD. The ground level is shown on the site plan. The ground level is shown on the site plan. The ground level is shown on the site plan.

**PROPOSED FLOOR PLAN**

100% of the site is to be built on a level of 100.00m AOD. The ground level is shown on the site plan. The ground level is shown on the site plan. The ground level is shown on the site plan.

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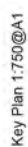
100% of the site is to be built on a level of 100.00m AOD. The ground level is shown on the site plan. The ground level is shown on the site plan. The ground level is shown on the site plan.

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Proposed Site Plan  
1:100



Kingston Lane,  
Lisbridge, Lifford 3004

## EXISTING ELEVATIONS

## Preparation for Planning

Running program number:	Chart #
145413	1

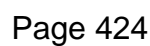
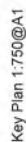
M9805-HUN-DR-02-0014-Existing Elevations

Updated to reflect annotations



All drawings are to the printed document.

[illegible]



Space One Blanton Road  
London W6 8JA  
T 020 8217 8200  
mail@spaceone.co.uk  
www.spaceone.co.uk

LUXBRIDGE MORTUARY, LB HILLINGDON  
Kingston Lane,  
Lebridge, URB 3PH

## PROPOSED ELEVATIONS

### Prepared for PLANNING

owner's project number: 145005	client project number: -	scale: 1:1000A1	drawn by: MSP	checked by: TKA
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Drawing title: M9805-HUN-DR-02-0020

XG



All drawings are to be printed in colour.

File name: M205-4 (Rev. 10-2020) - U.S. Department of Education .dwg







SCHEDULE OF ACCOMMODATION	
FLOOR	0th (B1)
Existing Floor Area	252.7sqm
Proposed Extension	44.7sqm
Overall Extension	55.7sqm
Total Site Area: 0.14 Hectares	
Number of Parking: 5 (New, 0 Existing)	

Proposed Extension: 44.7sqm  
 Existing Floor Area: 252.7sqm  
 Overall Extension: 55.7sqm  
 Total Site Area: 0.14 Hectares  
 Number of Parking: 5 (New, 0 Existing)

**hunters**

Specialist Design & Planning  
 100-102 High Street  
 London W1A 0AA  
 Tel: 020 7494 4000  
 www.hunters.co.uk

**LUXBRIDGE MORTUARY, LB HILLINGTON**  
 Luxbridge Mortuary  
 Luxbridge, LB Hillington

**PROPOSED FLOOR PLAN**

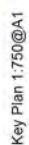
Prepared for: PLANNING

Drawn by: J. DODD  
 Checked by: J. DODD  
 Date: 15/06/17  
 Scale: 1:500 A1

Project No: MB005-HUN-DR-02-0010

North Arrow

0 10m 20m 30m  
 Scale: 1:500 A1



Key Plan 1:750@A1



Service Riser / "Chimney"

### Existing Air Handling Units and Ductwork

Information on Boston Plain Avenue  
Planning Issue



Journal Club Business School  
London W10 0AB  
T 020 8223 7620  
margaret@jbs.ac.uk  
www.jbs.ac.uk

LUXBRIDGE MORTUARY, LB HILLINGDON  
Kingston Lane,  
Luton, Bedfordshire, LU8 3PH

## EXISTING ROOF PLAN

<p> <input type="checkbox"/> <b>Required for PLANNING</b> </p>	<p> <b>Number of project number</b>  M9805 </p>	<p> <b>Client project number</b>  1100QA.1 </p>	<p> <b>Drawn by</b>  M9805 </p>	<p> <b>Checked by</b>  TVA </p>
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**Drawing title**  
M9805-HUN-DR-02-0030

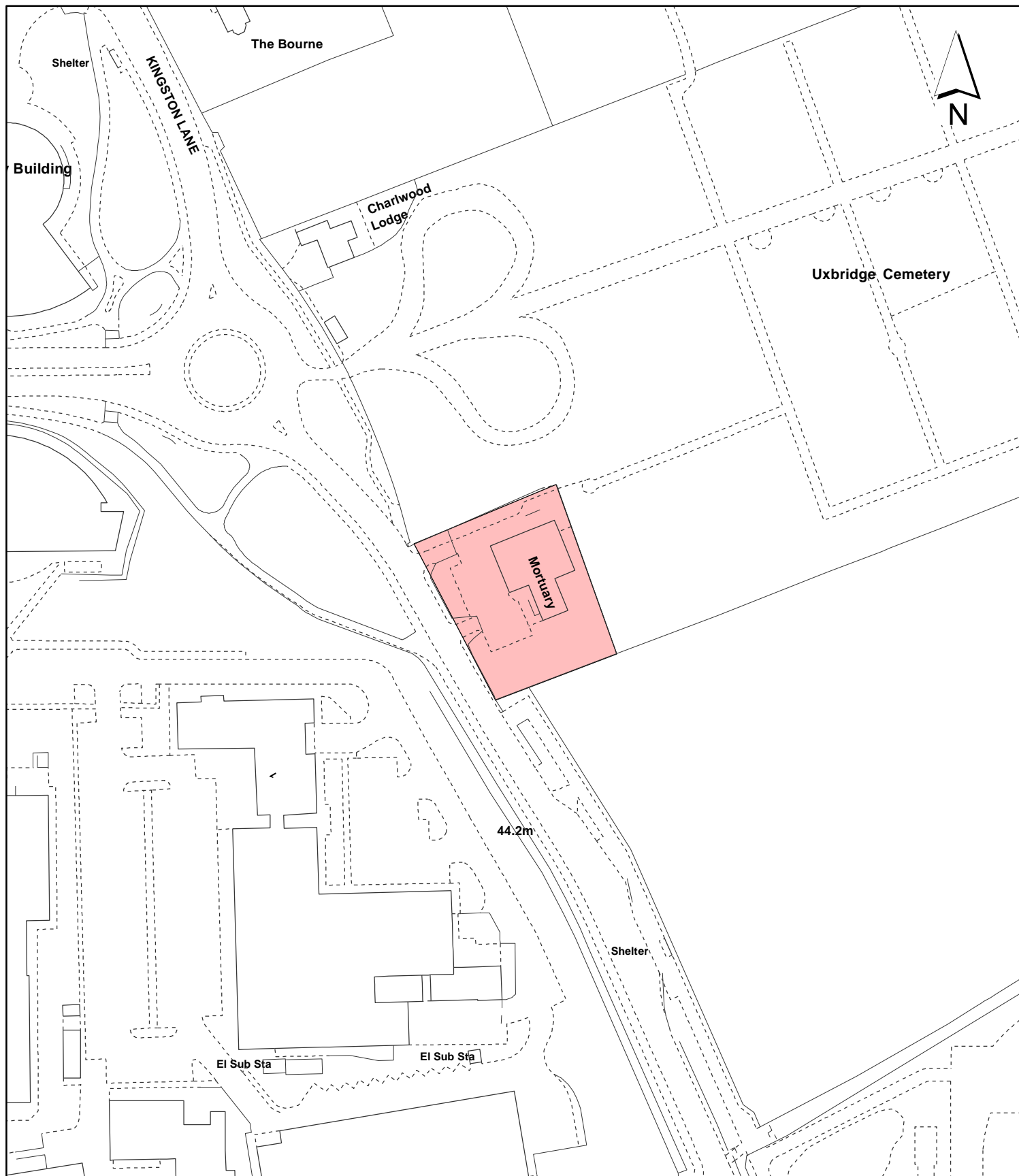
1



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Site Address:

## Uxbridge Mortuary Kingston Lane

Planning Application Ref:

**13102/APP/2019/3950**

Scale:

**1:1,250**

Planning Committee:

**Major** Page 429

Date:

**February 2020**

## LONDON BOROUGH OF HILLINGDON

**Residents Services  
Planning Section**

Civic Centre, Uxbridge, Middx. UB8 1UW  
Telephone No.: Uxbridge 01895 250111



**HILLINGDON**  
LONDON

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