

## Report of the Head of Planning, Sport and Green Spaces

**Address** THE BATTLE OF BRITAIN BUNKER, RAF UXBRIDGE HILLINGDON ROAD  
UXBRIDGE

**Development:** 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.

**LBH Ref Nos:** 585/APP/2014/3910

**Drawing Nos:** 1308 PL001 Location Plan  
1308 PL002 Existing Site Plan  
1308 PL004 Proposed Site Plan  
1308 PL022 - Plans Rev01  
1308 PL023 - Elevations Rev01  
1308 PL024 - Sections Rev01  
Battle of Britain Education Visitor Centre - DAS

**Date Plans Received:** 04/11/2014                      **Date(s) of Amendment(s):**

**Date Application Valid:** 19/11/2014

### 1. SUMMARY

The application seeks to obtain permission for the erection of a Battle of Britain Education and Visitor centre with exhibition space, auditorium, meeting rooms, library, cafe and shop and associated parking area and landscaping.

Prior approval was granted for the demolition of the existing building and planning permission was granted in December 2014 for enabling works to allow construction of the building which is the subject of this application. Enabling works include the creation of a temporary compound to facilitate demolition together with a temporary structure to house the volunteers during demolition and construction thus enabling the facility to remain open.

The application site is located within land designated as Green Belt while the adjacent underground Bunker is a Grade I listed structure. Development in the green belt is generally considered inappropriate except in special circumstances. It is considered that the new facility, which will enhance the visitor and educational offering on the site together with assisting in securing the future of the listed bunker, provides special circumstances which would justify development in the green belt.

The proposed building, while offering enhanced facilities to visitors is also considered to preserve the setting of the listed bunker. The proposal is therefore considered acceptable in heritage terms.

The proposed development in terms of other impacts including ecology, sustainability, highways and access is considered acceptable subject to conditions.

### 2. RECOMMENDATION

**That subject to the Mayor not directing the Council under Article 6 of the Town and Country Planning (Mayor of London) Order 2008 to refuse the application, or under Article 7 of the Order that he is to act as the local planning authority for the**

**purpose of determining the application, and subject to referral to the Secretary of State, under the Consultation Direction 2009, delegated powers be given to the Head of Planning, Green Spaces and Culture to grant planning permission, subject to any relevant amendments agreed by the Head of Planning, Green Spaces and Culture also those requested by the Greater London Authority and the following:**

**A) That subject to the above, the application be deferred for determination by the Head of Planning, Green Spaces and Culture under delegated powers.**

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

**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 1308 PL004 Proposed Site Plan Rev 01, 1308 PL022 Plans Rev 02 and shall thereafter be retained/maintained for as long as the development remains in existence.

**REASON**

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (July 2011).

**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:

Cycle Parking and Transport Works [Transport Statement]

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 . Specify Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

**4 COM7 Materials (Submission)**

No development, except demolition, shall take place until details of all materials and external surfaces, including details of roof drainage 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 Policy BE13 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

### **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)**

No development, except demolition, 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 parking (6 spaces)

2.c Means of enclosure/boundary treatments

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 (July 2011)

### **7 COM15 Sustainable Water Management**

No development, except demolition, shall be commenced until a scheme for the provision of sustainable water management has been submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate that sustainable drainage systems (SUDS) have been incorporated into the designs of the development in accordance with the hierarchy set out in accordance with Policy 5.15 of the London Plan and will:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:
- iv. provide details of water collection facilities to capture excess rainwater;
- v. provide details of how rain and grey water will be recycled and reused in the development.

Thereafter the development shall proceed in accordance with the approved scheme.

#### REASON

To ensure the development does not increase the risk of flooding in accordance with Policy OE8 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and London Plan (July 2011) Policy 5.12.

### **8 NONSC Non Standard Condition**

No development, except demolition, shall commence until a detailed energy assessment shall be submitted showing how the development will reduce carbon emissions by 35% from a 2013 Building Regulations compliant development. The assessment shall clearly show:

- 1) the baseline energy demand (kwhr and kgCO<sub>2</sub>) for each element of the regulated energy use (e.g. space heating, hot water and electricity) for all the relevant uses (e.g. residential, commercial etc).
- 2) the methods to improve the energy efficiency of the development and how this impacts on the baseline emissions and where they will be included within the development.

3) full details, specification and location of the renewable energy technology to be used across the site. This should include relevant roof plans and elevations for solar thermal and photovoltaics, elevations showing the inclusion of air source heat pumps, and design layout for ground source heat pumps.

4) how all the technology will be maintained, monitored and managed throughout the lifetime of the development.

The development must be completed in accordance with the approved details.

#### REASON

To ensure appropriate carbon savings are delivered in accordance with London Plan Policy 5.2.

#### **9 NONSC Non Standard Condition**

No demolition shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of building recording and reporting in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing. No development shall take place other than in accordance with the Written Scheme of Investigation unless agreed in writing with the Local Planning Authority.

#### Reason

Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF.

#### **10 OTH2 Archaeology**

A) No development, except demolition, shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological works in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.

B) No development shall take place other than in accordance with the Written Scheme of Investigation approved under Part (A).

C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

#### REASON

Heritage assets of archaeological interest are expected to survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results.

### **INFORMATIVES**

#### **1**

The written scheme of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. It must be approved by the planning authority before any

on-site development related activity occurs.

**2 I52 Compulsory Informative (1)**

The decision to GRANT/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).

**3 I53 Compulsory Informative (2)**

The decision to GRANT/REFUSE 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 (July 2011) and national guidance.

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM3	Proposals for new roads or widening of existing roads
AM7	Consideration of traffic generated by proposed developments.
LPP 5.1	(2011) Climate Change Mitigation
LPP 5.12	(2011) Flood risk management
LPP 5.13	(2011) Sustainable drainage
LPP 5.15	(2011) Water use and supplies
LPP 5.2	(2011) Minimising Carbon Dioxide Emissions
LPP 5.3	(2011) Sustainable design and construction
LPP 5.7	(2011) Renewable energy
LPP 6.13	(2011) Parking
LPP 7.16	(2011) Green Belt
LPP 7.19	(2011) Biodiversity and access to nature
LPP 7.4	(2011) Local character
LPP 7.6	(2011) Architecture
LPP 7.8	(2011) Heritage assets and archaeology
NPPF	National Planning Policy Framework
OE1	Protection of the character and amenities of surrounding properties and the local area
OL4	Green Belt - replacement or extension of buildings
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements

**4 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. 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.

**5**            I1                    **Building to Approved Drawing**

You are advised this permission is based on the dimensions provided on the approved drawings as numbered above. The development hereby approved must be constructed precisely in accordance with the approved drawings. Any deviation from these drawings requires the written consent of the Local Planning Authority.

**6**            I13                    **Asbestos Removal**

Demolition and removal of any material containing asbestos must be carried out in accordance with guidance from the Health and Safety Executive and the Council's Environmental Services. For advice and information contact: - Environmental Protection Unit, 3S/02, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 277401) or the Health and Safety Executive, Rose Court, 2 Southwark Bridge Road, London, SE1 9HS (Tel. 020 7556 2100).

**7**            I25A                    **The Party Wall etc. Act 1996**

On 1 July 1997, a new act, The Party Wall etc. Act 1996, came into force.

This Act requires a building owner to notify, and obtain formal agreement from, any adjoining owner, where the building owner proposes to:-

- 1) carry out work to an existing party wall;
- 2) build on the boundary with a neighbouring property;
- 3) in some circumstances, carry out groundworks within 6 metres of an adjoining building.

Notification and agreements under this Act are the responsibility of the building owner and are quite separate from Building Regulations or planning controls. Building Control will assume that an applicant has obtained any necessary agreements with the adjoining owner, and nothing said or implied by Building Control should be taken as removing the necessity for the building owner to comply fully with the Act.

**8**            I3                    **Building Regulations - Demolition and Building Works**

Your attention is drawn to the need to comply with the relevant provisions of the Building Regulations, the Building Acts and other related legislation. These cover such works as - the demolition of existing buildings, the erection of a new building or structure, the extension or alteration to a building, change of use of buildings, installation of services, underpinning works, and fire safety/means of escape works. Notice of intention to demolish existing buildings must be given to the Council's Building Control Service at least 6 weeks before work starts. A completed application form together with detailed plans must be submitted for approval before any building work is commenced. For further information and advice, contact - Residents Services, Building Control, 3N/01 Civic Centre, Uxbridge (Telephone 01895 250804 / 805 / 808).

**9**            I49                    **Secured by Design**

The Council has identified the specific security need(s) of the application site to be: (State specific security need(s)).

You are advised to submit details to overcome the specified security need(s) in order to comply with condition X of this planning permission.

(Please Note: This Informative must accompany Condition OM14).

## **10 Notification of Commencement of Works**

Written notification of the intended start of works shall be sent to Residents Services, London Borough of Hillingdon, Civic Centre, High Street, Uxbridge, UB8 1UW at least seven days before the works hereby approved are commenced.

## **11**

Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.

## **12**

Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.

## **13**

Flashing beacons/strobe lights linked to the fire alarm should be carefully selected to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

### **3. CONSIDERATIONS**

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

The application site forms part of St Andrews Park (the former RAF Uxbridge Site), for which outline consent was granted under application reference 585/APP/2009/2752 for a residential led, mixed-use development.

The RAF Bunker site is currently occupied by part of the former Sergeants Mess, currently used by the Friends of the Bunker volunteers who manage the use of the adjacent underground bunker, a WW1 structure used during the Battle of Britain and now a visitor centre with the recreated plotting room and numerous RAF exhibits.

The site also includes the Uniter Building (Cold War Bunker) to the north and electricity substation to the east.

#### **3.2 Proposed Scheme**

The application seeks to obtain permission for the erection of a Battle of Britain Education and Visitor centre with exhibition space, auditorium, meeting rooms, library, cafe and shop and associated parking area and landscaping.

The building will be erected on the site of the Mess Building (known as Building 76) which will be demolished. The proposed building will provide approximately 1970sqm of floorspace having a width of 23m, length of 60m and maximum height of 14.5m. The building will have two storeys with a distinctively angled roof.

Parking is proposed at both upper and lower ground floor levels with the main pedestrian access from the upper floor.

#### **3.3 Relevant Planning History**

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

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

Planning permission was approved on 10 December 2014 under application reference 585/APP/2014/3739 for the erection of a temporary modular building with associated works and installation of a temporary road. These are works to enable the continued operation of the facilities during demolition and construction.

Prior approval was granted for the demolition of the former AUS building on 17 November 2014.

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

##### **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.CI2 (2012) Leisure and Recreation
- PT1.CI3 (2012) Culture
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.T1 (2012) Accessible Local Destinations

Part 2 Policies:

- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons

AM3	Proposals for new roads or widening of existing roads
AM7	Consideration of traffic generated by proposed developments.
LPP 5.1	(2011) Climate Change Mitigation
LPP 5.12	(2011) Flood risk management
LPP 5.13	(2011) Sustainable drainage
LPP 5.15	(2011) Water use and supplies
LPP 5.2	(2011) Minimising Carbon Dioxide Emissions
LPP 5.3	(2011) Sustainable design and construction
LPP 5.7	(2011) Renewable energy
LPP 6.13	(2011) Parking
LPP 7.16	(2011) Green Belt
LPP 7.19	(2011) Biodiversity and access to nature
LPP 7.4	(2011) Local character
LPP 7.6	(2011) Architecture
LPP 7.8	(2011) Heritage assets and archaeology
NPPF	National Planning Policy Framework
OE1	Protection of the character and amenities of surrounding properties and the local area
OL4	Green Belt - replacement or extension of buildings
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements

## 5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **15th December 2014**

5.2 Site Notice Expiry Date:- Not applicable

## 6. Consultations

### External Consultees

Consultation letters were sent to 16 local owner/occupiers on 20 November 2014. The application was also advertised by way of site and press notices. No responses were received.

### ENGLISH HERITAGE:

The proposal is to demolish the remaining section of the mess building (Building 76) to the north of the bunker and to replace it with a new visitor centre on its site. The mess building is a functionally-related part of the setting of the bunker, an early part of RAF Uxbridge's development, and a non-designated heritage asset. However, we understand that the long-term viability of the bunker is likely to be reliant on a significant upgrading of its facilities, and on balance, we accept that the loss of the much-altered building is outweighed by the benefits for the grade I listed bunker and its accessibility to the public. We reiterate the conservation officer's recommendation that the mess building should be recorded as a condition of its demolition, and items of historical interest salvaged where possible.

When visiting the bunker it was still being cleaned up and repaired following flood damage earlier this

year. The remaining original elements and restored interiors of this exceptionally significant structure are at risk from future flooding. If this has not been completed recently, we would encourage a review of the flood prevention and management strategy for this site.

We recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request.

GLAAS:

Thank you for your consultation dated 20/11/2014.

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

The above planning application affects heritage assets of archaeological and historical interest and lies in an area where further associated remains could be discovered.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

As described in the Heritage Assessment, the application site was an important part of RAF Uxbridge including the grade I command bunker from which the Battle of Britain was directed. The bunker and associated structures can therefore be regarded as a complex of national and international significance. Whilst the heritage interest is primarily historical there is also a significant archaeological dimension:

#### Building archaeology

I note that building 76 which is proposed for demolition is the possibly last surviving part of a First World War Canadian military hospital and must have had a military function during the Second World War - quite probably this use was related to the adjacent bunker although this is not clearly articulated in the heritage assessment.

The assessment states (page 24) that the history of this building requires further research so its significance may not be fully understood. For example at Bletchley Park the significance of the temporary huts was not recognised for many years.

I note that my Development Management colleagues consider that the loss of this building is outweighed by the benefits for the grade I listed bunker and its accessibility to the public. I recommend that a fully analytical building record (level 3/4) should be made and should include further documentary research, and ideally oral history. Comparison with other sites may also be informative as it may be a rare survival of a WW1 temporary hospital structure - others such as the Canadian Hospital at Cliveden (South Bucks) have been demolished.

#### Below-ground archaeology

It is disappointing that the heritage statement make no attempt to consider the military archaeology interest in the site. The site has potential for buried military features and artefacts which could reveal

more about activities conducted in association with the nationally important bunker. A military archaeology assessment should therefore be carried out so that an appropriate mitigation strategy can be defined.

#### Recommended conditions

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates that if it is considered that the benefits of the development outweigh the harm then I recommend that a condition is applied to require an investigation to be undertaken to advance understanding. The archaeological interest should be conserved by attaching a condition as follows:

Reason: Heritage assets of archaeological interest are expected to survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results.

#### Condition:

A) No development shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological investigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.

B) No development or demolition shall take place other than in accordance with the Written Scheme of Investigation approved under Part (A).

C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

Informative: The written scheme of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. It must be approved by the planning authority before any on-site development related activity occurs.

To secure building recording I also recommend that the following condition is applied:

Reason: Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF.

Condition: No demolition shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of building recording and reporting in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing. No development shall take place other than in accordance with the Written Scheme of Investigation.

Informative : The written scheme of investigation will need to be prepared and implemented by a suitably qualified heritage practice in accordance with English Heritage Greater London Archaeology guidelines. It must be approved by the planning authority before any on-site development related activity occurs.

#### GREATER LONDON AUTHORITY:

The application has been referred to the Mayor of London as an application of Potentially Strategic Importance. The Stage I Response is due to be received by 6 January 2015 at the latest. The

response will be reported at the planning committee.

#### TRANSPORT FOR LONDON:

The submitted Transport Statement recognises that travel to the bunker via public transport should be encouraged through measures such as providing information on the bunker's website. This is welcomed.

It is stated that Hillingdon's Unitary Development Plan does not contain cycle parking standards for this land use. However, standards are set out in the Revised Early Minor Alterations to the London Plan (REMA), which would require the provision of the proposed six spaces. As such, this is welcomed.

It may be sensible to provide a track plot for a coach as coach plots appear to be anticipated. The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail.

The rate for Hillingdon is £35 per square metre. The required CIL should be confirmed by the applicant and council once the components of the development or phase have been finalised.

#### Internal Consultees

##### TREES AND LANDSCAPE:

Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

Saved policy OL1 and 2, and the National Planning Policy Framework seek to restrict inappropriate development and retain the openness, character and appearance of the Green Belt.

- A Tree Report and Arboricultural Method Statement, ref. LBH/UXB-BBB/AMS/01a, by Landmark Trees, has been submitted.
- The report assesses the condition and value of 9No. individual trees, or tree groups, close to the site.
- The survey concludes that none of the trees fall into the 'A' category (good - normally considered a constraint on development). 3No. trees are 'B' category (moderate), 4No. are 'C' grade (low quality) and 2No. are 'U' (unsuitable for retention). There is no objection to these conclusions.
- The report provides a detailed Method Statement designed to minimise damage to trees on the site. At 1.7 the report confirms that Landmark Trees will be retained at key points of the demolition and construction work to monitor the tree protection and associated works. A log book of site monitoring will be kept (1.7.5)
- Tree protection, in accordance with the recommendations of BS5837:2012, is specified in Fig.1 and Fig. 2. A typical 'no dig' tarmac construction is shown on page 14.
- A Tree Constraints Survey Schedule and Recommended Tree Works are provided in Appendix 1 and 2.
- T2629 and T2630, Himalayan Cedars (B grade) will be crown lifted to facilitate the construction of a footpath. T2631, an Ash (U grade) will have specific branches removed to facilitate the development of the building. T2631, Cherry (C grade), G2633, Cherry (U grade) and T2634, Sycamore (C) will be felled to facilitate the development.
- Appendix 6 provides a Tree Protection Plan.
- Gillespie's document, Landscape Planning, dated October 2014, provides a landscape and visual analysis of the site and provides attractive images of hard and soft landscape features and materials/plants which might be appropriate for this site.
- Gillespie's drawing No. OX5248-200-P, Landscape General Arrangement Plan, indicates the proposed site layout with proposed hard and soft landscape details.
- As drawn, the layout fails to convey the quality of landscape detail or visual interest indicated in the

precedent images illustrated in the Landscape Planning document. Specific points which need to be addressed:

- The drawing fails to indicate clearly which of the existing trees will be retained to which will provide instant maturity to the landscape of the site. A number of new trees are shown along the existing service road. However, there is a mature tree-lined avenue here already. New planting at this location will be superfluous and shaded out by the existing trees.
- The hedge planting strips on the grass slopes between the service road and the Uniter bunker. It is not clear how effective this planting will be when viewed from the upper or lower roads.
- There is little landscape enhancement or visual interest within the lower level car park, or against the north elevation of the building. The area is currently dominated by hard surfacing.
- Specimen tree planting within the large forecourt (upper level entrance to the building) should be considered.
- The paved forecourt at the main entrance to the building areas has to accommodate complex changes of levels and interfaces between different planes. It is not clear how these inter-relate. Level details are required. Step and ramp details are required. Details of retaining walls and free-standing wall, / railings are required.

#### RECOMMENDATIONS:

No objection to the conclusions of the Tree Report.

Amendments to the landscape proposals are required. In order to clarify the design opportunities and constraints a meeting with the design team, including the landscape consultant, would be useful. The information on plan fails to convey the richness of detail and distinct sense of place illustrated in the Landscape Planning document.

#### HIGHWAYS:

Access to the site is from Vine Lane via the former RAF site's internal road network, with Yew Tree Road being the main access road to the Bunker site.

Existing hours of operation are weekday guided tours by appointment only usually between 10.00 am and 2.00 pm and weekend open visiting between 10.00 am and 4.00 pm, usually one weekend per month. The Transport Statement provides existing monthly visitors based on information provided by the Battle of Britain Bunker Visitor Centre. They show an average of 41 visits occurred each weekday with visits being arranged on pre-booked time slots. It is also estimated by the visitor centre that around 150 visits would take place on an open weekend.

The replacement building will offer new and updated facilities and may generate a small increase in visitor numbers. However the visitors will continue to be restricted to pre-booked tours, organised into parties not exceeding 20. It is not expected that more than 60 visitors would be on site at any one time assuming a full coach party visits the site.

There are around 40 residential properties served by Yew Tree Road. The existing 2 way AM and PM peak hour trips are 25 and 22. However as the Bunker opening hours are 10.00 to 14.00 hours it is likely that the vast majority of existing trips relate to the residential properties.

From the TRICS database the nearest comparable site is the museum of London Docklands which is open from 10.00 to 16.00 hours.

The proposal provides an additional 17 car parking spaces at the lower level. Parking accumulation based on trips from TRICS indicate a demand for 20 spaces which can be met by the available parking on site.

Auto tracks provided indicate that 7.5 and 18 tonne rigid vehicles and a fire tender can access the site and leave in forward gear whilst cars are parked at the site. It is not expected that articulated

lorries would arrive for general servicing except for transporting museum pieces including planes. This would need to be arranged outside opening hours with the car park closed.

Six cycle parking spaces are being provided and the transport statement recommends that the website for visitors should include information on travel to the site by public transport.

No objections are raised on highway grounds.

#### ACCESS:

Planning permission is sought to replace the existing AUS building with a new visitor centre and museum. The Battle of Britain Bunker is not accessible to wheelchair users, however the proposed visitor centre would be fully accessible, with ramped access at the entrance, a passenger lift from the ground to lower ground and dedicated wheelchair user spaces in the auditorium. Public toilets, including accessible WCs, are to be provided on the upper and lower ground floors.

The proposal raises no concerns, however, a suitable planning condition should be attached to any permission to ensure that adequate parking is provided for disabled visitors.

#### Recommended Informatives:

1. Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.
2. Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.
3. Flashing beacons/strobe lights linked to the fire alarm should be carefully selected to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

Conclusion: acceptable, subject to a suitable condition to secure sufficient and suitable parking for disabled visitors.

#### ENVIRONMENTAL PROTECTION UNIT:

The development is on the RAF site. The history seems to indicate that the land was part of the Hillingdon House Estate prior to being purchased by the MOD in 1915. During the war the site then became the famous Battle of Britain bunker. As regards contaminated land I do not have a site investigation report for this particular area of the RAF site. The main reports I have are by Atkins consultants on the phases of the current large housing development adjacent to the site at St Andrews Park. There were some earlier reports by Enviro and Halcrow consultants for the MOD on RAF Uxbridge. However I do not have copies and I am not sure as to whether they included this area. The land may well be of a good quality but this is by no means certain given the past MOD use. The use of the land prior to the bunker is rather unknown and in some parts of the RAF site we have had contaminated soil being present due to the incineration and deposit of ash and metal from burnt materials including bullet cases. There were 2 nearby firing ranges to the west and an incinerator to the south west. A contaminated land investigation is recommended for the site to clarify the ground conditions. This will most likely be in the form of a geo-environmental study and may have been already carried out by the Council? If so can we have the report. The application mentions a Phase 1 desk study but I cannot find this in the application documents. I would advise adding our standard condition, COM30. An imported soil condition may also help as there appears to be quite a lot of landscaping. It may that there is enough soil on site for the development, or imports could be from other parts of the RAF site or from outside the site. We would need to know the imports are clean and uncontaminated. I have had a quick look at the asbestos report recently for

the building to be demolished. It appears there is a significant amount of asbestos in the building structure. I understand that this will be removed according to HSE standards, and will not affect the ground post removal.

Condition: COM30- Contaminated Land

(i) The development hereby permitted shall not commence until a scheme to deal with contamination has been submitted in accordance with the Supplementary Planning Guidance Document on Land Contamination and approved by the Local Planning Authority (LPA). The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

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

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with details of a watching brief to address undiscovered contamination.

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

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

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy OE11 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

Import Condition

Condition to minimise risk of contamination from garden and landscaped areas

Before any part of the development is occupied, site derived soils and 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. Note: The Environmental Protection Unit (EPU) must be consulted for their advice when using this condition.

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 Unitary Development Plan Saved Policies (September 2007)

SUSTAINABILITY:



## Ecology

I have no objections to the proposed development. The ecology reports consider the impacts on reptiles and bats. The reports show no evidence of species within these groups and therefore the development will have a minimal impact. However, the development will result in the loss of several trees reducing the overall value of wildlife on the site. As a consequence the following condition is necessary to ensure the development provides no net loss in ecological benefit with the aim of achieving a net gain in accordance with the NPPF.

### Condition

Prior to the commencement of development an ecological enhancement scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly detail measures to promote and enhance wildlife opportunities within the landscaping and the fabric of the building (where possible) including measures such as habitat walls, bird and bat boxes and nectar rich planting. The scheme shall aim to include an area of land dedicated to wildlife habitat planting. The development must proceed in accordance with the approved scheme.

### Reason

To ensure the development contributes to ecological enhancement in accordance with Policy EM7 (Local Plan) and Policy 7.28 of the London Plan.

## Energy

The development is a major scheme and needs to provide an energy assessment in accordance with the London Plan. The submitted report is no more than a statement and does not detail how the development will actually achieve the required 35% reduction. There are no baseline emissions, no details of energy saving measures and their impact on the baseline and no details of technology to reduce the emissions to the required target.

## FLOODWATER MANAGEMENT:

To ensure the development reduces flood risk to the surrounding area and manages surface water on site I request the following condition:

Prior to commencement, 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 incorporates sustainable urban drainage in accordance with the hierarchy set out in Policy 5.15 of the London Plan and will:

- i. provide information on all Suds features including the method employed to delay and control the surface water discharged from the site and:
  - a. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume.
  - b. any overland flooding should be shown, with flow paths depths and velocities identified as well as any hazards, ( safe access and egress must be demonstrated).
  - c. measures taken to prevent pollution of the receiving groundwater and/or surface waters;
  - d. how they or temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.
- ii. provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification, remediation and timescales for the resolving of issues.
- iii. provide details of the body legally responsible for the implementation of the management and maintenance plan.

The scheme shall also demonstrate the use of methods to minimise the use of potable water through

water collection, reuse and recycling and will:

- iii incorporate water saving measures and equipment.
- iv. provide details of water collection facilities to capture excess rainwater;
- v. provide details of how rain and grey water will be recycled and reused in the development.

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

## REASON

To ensure that surface water runoff 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 (July 2011) and National Planning Policy Framework (March 2012) and the Planning Practice Guidance (March 2014). To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (July 2011), and conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (July 2011).

## **7. MAIN PLANNING ISSUES**

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

The proposed development comprises the erection of a new purpose built visitor and education centre in connection with the existing Battle of Britain WW1 Bunker and museum.

Policy CI1 states that the council will ensure that community and social infrastructure is provided in Hillingdon while Policy CI3 seeks to ensure that cultural uses help improve the quality of life of residents and visitors including safeguarding the quality of existing viable cultural facilities and supporting proposals for new and improved facilities.

The proposed development will provide a much enhanced facility for visitors and volunteers thus considerably improving the cultural offer in the London Borough of Hillingdon. The proposal is therefore considered acceptable in principle with regards to Policies CI1 and CI3 of the Local Plan: Part 1.

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

Not applicable to this application.

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

Listed Building

The Battle of Britain Bunker is a Grade I listed structure and therefore the impact of the proposed development on the setting of the listed building must be assessed.

Policy HE1 states that the Council will conserve and enhance Hillingdon's distinct and varied environments including designated heritage assets such as Listed Buildings.

The existing building is to be demolished to enable the development of the new visitor centre. The existing building is a remnant of a much larger structure dating from WW1 believed to have been originally constructed as a Sergeants' Mess and known as Building 76. The building is not listed and prior approval was granted for its demolition in November 2014 (ref:585/APP/2014/3723). In order to preserve a record of this building, a historic survey to English Heritage level 4 will be secured through condition prior to the demolition. A copy of this should be provided for EH, the Planning Department and another made available to the Uxbridge Local History Library.

The proposed visitor centre is sited on the same building line as the existing building in order to ensure the banks and mounding around the bunker, which form part of the listed

structure, are not disturbed during construction. While the proposed building is larger than the existing, it is considered to be well designed and give that the listed structure is predominately below ground, the proposal is considered to preserve the setting of the listed building therefore acceptable with regards to Policy HE1 of the Local Plan: Part 1.

#### Archaeology

Greater London Archaeology Advisory Service (GLAAS) have been consulted on the application and have identified the possible chance of archaeological remains on site. A condition will be placed on the permission requiring the submission of a Written Scheme of Investigation prior to the construction of the new building.

#### **7.04 Airport safeguarding**

Not applicable to this application.

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

The application site is located within land designated as green belt.

Policy EM2 of the Local Plan: Part 1 states that any proposals for development in Green Belt will be assessed against national and London Plan policies.

Policy OL1 of the Local Plan: Part 2 states that within the green belt, open land uses which include agriculture, open air recreational facilities and cemeteries will be acceptable in principle

Policy OL4 of the Local Plan: Part 2 states that the replacement or extension of buildings within the green belt will only be permitted if the development would not result in any disproportionate change in the bulk and character of the original building, the development would not significantly increase the built up appearance of the site; and the development, with regards to the surrounding character, would not injure the visual amenities of the green belt by reason of siting, materials, design, traffic or activities generated.

Policy 7.16 of the London Plan indicates that the strongest protection should be given to London's Green Belt in accordance with national guidance which is now set out in Chapter 9 of the NPPF.

Paragraph 87 of the NPPF states that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 88 makes it clear that substantial weight should be given to any harm to the Green Belt and 'Very special circumstances' will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations.

Paragraph 89 sets out the exceptions to the new buildings being considered inappropriate in the Green Belt including the complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt than the existing development.

The proposed development includes the demolition of the existing building on site and replacement with a purpose built visitor centre with exhibition spaces, auditorium, meeting rooms, cafe, shop and library. The replacement building with its improved exhibition space, additional rooms and facilities is intended to provide a greater offering to visitors to the adjacent former RAF Bunker which contains a vast amount of RAF exhibits together with the plotting room as used during the Battle of Britain.

The adjacent bunker is Grade I listed and has a number of associated problems with regards to upkeep and flooding. The visitor centre will provide an opportunity for future revenues which can contribute to the ongoing maintenance of the underground bunker.

The proposed building is larger than the existing building on site which is led by a need to deliver larger exhibition space and an auditorium. The proposed development will provide a new educational facility and continued association with the former use of the wider RAF site together with a cultural and educational link to the Battle of Britain. Furthermore, it is intended to bring the building into use in September 2015 to commemorate the start of the Battle of Britain.

The siting of the building will be in place of the existing building and its location is governed by the associated link to the adjacent RAF Bunker. In order to continue the link the RAF Bunker the siting of the new building must be located within the Green Belt. In this regard, there are considered to be very special circumstances for development within the Green Belt.

While special circumstances are considered to be present for the development of the building in the Green Belt, consideration must also be given to the proposed development with regards to Paragraph 89 of the NPPF. Given the existing building, the site can be regarded as previously development as defined in the NPPF. The proposed development with surrounding trees and topography is largely screening from views and therefore not considered to have a greater impact on the openness of the Green Belt. Accordingly, the proposed development can be considered as not comprising inappropriate development in accordance with Paragraph 89 of the NPPF.

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

The immediate surrounding area comprises of the former RAF compound comprising of the RAF underground Bunker which is used as a visitor and educational attraction, the existing former Mess Building, the Uniter Bunker and electricity generator.

To the immediate east of the site lies residential properties occupied by MOD service personnel and to the north is the Grade II listed Hillingdon House and adjacent residential development associated with the redevelopment of RAF Uxbridge.

The wider area is experiencing a great deal of change with the comprehensive redevelopment of the wider RAF Uxbridge site for residential led mixed used development.

Policy BE1 of the Local Plan: Part 1 requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

The proposed development must be assessed in the context of the existing use of the site and changing nature of the wider area. The existing building is to be demolished and will be replaced by a purpose built visitor centre.

In general, RAF buildings tend to have a strong design identity and many new buildings, for example, those at RAF Cosford and RAF Duxford, include features that are modern yet quite distinctly RAF in character. As designed, this building with its distinctive roof design is considered to follow in this tradition and therefore the proposed development is considered to be acceptable with regards to Policy BE1 of the Local Plan: Part 1.

In order to ensure the detailed design is appropriate, a number of specific details shall be

secured by condition. These include the proposed materials, roof drainage, hard and soft landscaping and mechanical plant and vents.

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

The nearest residential properties are located to the east of the site. Due to significant level changes, these properties are situated at a higher level than the proposed development. Given the level change and distance between the properties, the proposal is not considered to impact on the occupants residential amenities with regards to Policies BE20, BE21 and BE24 of the Hillingdon Local Plan.

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

Not applicable to this application.

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

Access to the site is from Vine Lane via the former RAF site's internal road network, with Yew Tree Road being the main access road to the Bunker site.

Existing hours of operation are weekday guided tours by appointment only usually between 10.00 am and 2.00 pm and weekend open visiting between 10.00 am and 4.00 pm, usually one weekend per month. The Transport Statement provides existing monthly visitors based on information provided by the Battle of Britain Bunker Visitor Centre. They show an average of 41 visits occurred each weekday with visits being arranged on pre-booked time slots. It is also estimated by the visitor centre that around 150 visits would take place on an open weekend.

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There are around 40 residential properties served by Yew Tree Road. The existing 2 way AM and PM peak hour trips are 25 and 22. However as the Bunker opening hours are 10.00 to 14.00 hours it is likely that the vast majority of existing trips relate to the residential properties.

From the TRICS database the nearest comparable site is the museum of London Docklands which is open from 10.00 to 16.00 hours.

The proposal provides an additional 17 car parking spaces at the lower level. Parking accumulation based on trips from TRICS indicate a demand for 20 spaces which can be met by the available parking on site.

Auto tracks provided indicate that 7.5 and 18 tonne rigid vehicles and a fire tender can access the site and leave in forward gear whilst cars are parked at the site. It is not expected that articulated lorries would arrive for general servicing except for transporting museum pieces including planes. This would need to be arranged outside opening hours with the car park closed.

Six cycle parking spaces are being provided and the transport statement recommends that the website for visitors should include information on travel to the site by public transport. The cycle spaces will be secured by condition.

The proposed development is considered to be in accordance with adopted Car Parking Standards and Policies AM14 and AM15 of the Hillingdon Local Plan.

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

This is considered to be addressed in other sections of the report.

### **7.12 Disabled access**

The proposed development includes level access on lower ground level and upper level through ramp provision. A lift is also included in the development.

It is considered the proposed visitor centre is in accordance with Policy AM13 of the Hillingdon Local Plan, Policy 3.8 of the London Plan and Hillingdon Design and Accessibility Statement Accessible Hillingdon.

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

Not applicable to this application.

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

Trees and Landscaping

Policy BE38 of the Local Plan: Part 2 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

The application is accompanied by an Arboricultural Assessment which surveys the existing trees on site including which are to be removed and retained. There are no objections from the Landscape officer on the submitted tree report.

The proposal includes indicative landscaping details for the site, however given the importance of the proposal in regards to the setting of the listed building and green belt designation further details will be secured through condition.

Ecology

The application includes an ecology reports which considers the impacts on reptiles and bats. The reports show no evidence of species within these groups and therefore the development will have a minimal impact. However, the development will result in the loss of several trees reducing the overall value of wildlife on the site. In order to ensure the development provides no net loss in ecological benefit with the aim of achieving a net gain in accordance with the NPPF, a condition will be attached requiring details further details of ecological enhancements.

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

Policies within Chapter 5 of the London Plan and the London Sustainable Design and Construction SPG require developments to provide a reduction of 35% in carbon emissions beyond 2013 Building Regulations.

The application is accompanied by Sustainability Statement which sets out that the development will meet the overall target of 35% reduction in annual CO2 emissions beyond 2013 Building Regulations.

The Council's Energy Officer has reviewed the submitted statement and indicated that while there direction of travel to achieving the required 35% is acknowledged there are no details on how the reduction will be achieved. Planning Practice Guidance states that planning conditions can enable development proposals to proceed where it would otherwise have been necessary to refuse planning permission, by mitigating the adverse effects of the development. With regard to this, a condition will be added to the permission

to secure a detailed energy assessment setting out how the development achieves the required target. As such the application is considered acceptable in this regard.

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

The site does not fall within a flood zone. London Plan policy 5.13 states that development proposals should use sustainable urban drainage systems (SUDS) unless there are good reasons for not doing so. In addition, given the scale of the development, it is considered that additional water efficiency measures should be incorporated into the scheme, in accordance with London Plan policy. These would be required by way of a condition, should permission be granted.

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

Not applicable to this application.

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

No comments were received as part of this application.

#### **7.20 Planning obligations**

Not applicable to this application.

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

Not applicable to this application.

#### **7.22 Other Issues**

No further issues for consideration.

### **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**

The application seeks to obtain permission for the erection of a Battle of Britain Education and Visitor centre with exhibition space, auditorium, meeting rooms, library, cafe and shop and associated parking area and landscaping.

The application site is located within land designated as Green Belt while the adjacent underground Bunker is a Grade I listed structure. Development in the green belt is generally considered inappropriate except in special circumstances. It is considered that the new facility, which will enhance the visitor and educational offering on the site together with assisting in securing the future of the listed bunker, provides special circumstances which would justify development in the green belt.

The proposed building, while offering enhanced facilities to visitors is also considered to preserve the setting of the listed bunker. The proposal is therefore considered acceptable in heritage terms.

The proposed development in terms of other impacts including ecology, sustainability, highways and access is considered acceptable subject to conditions.

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

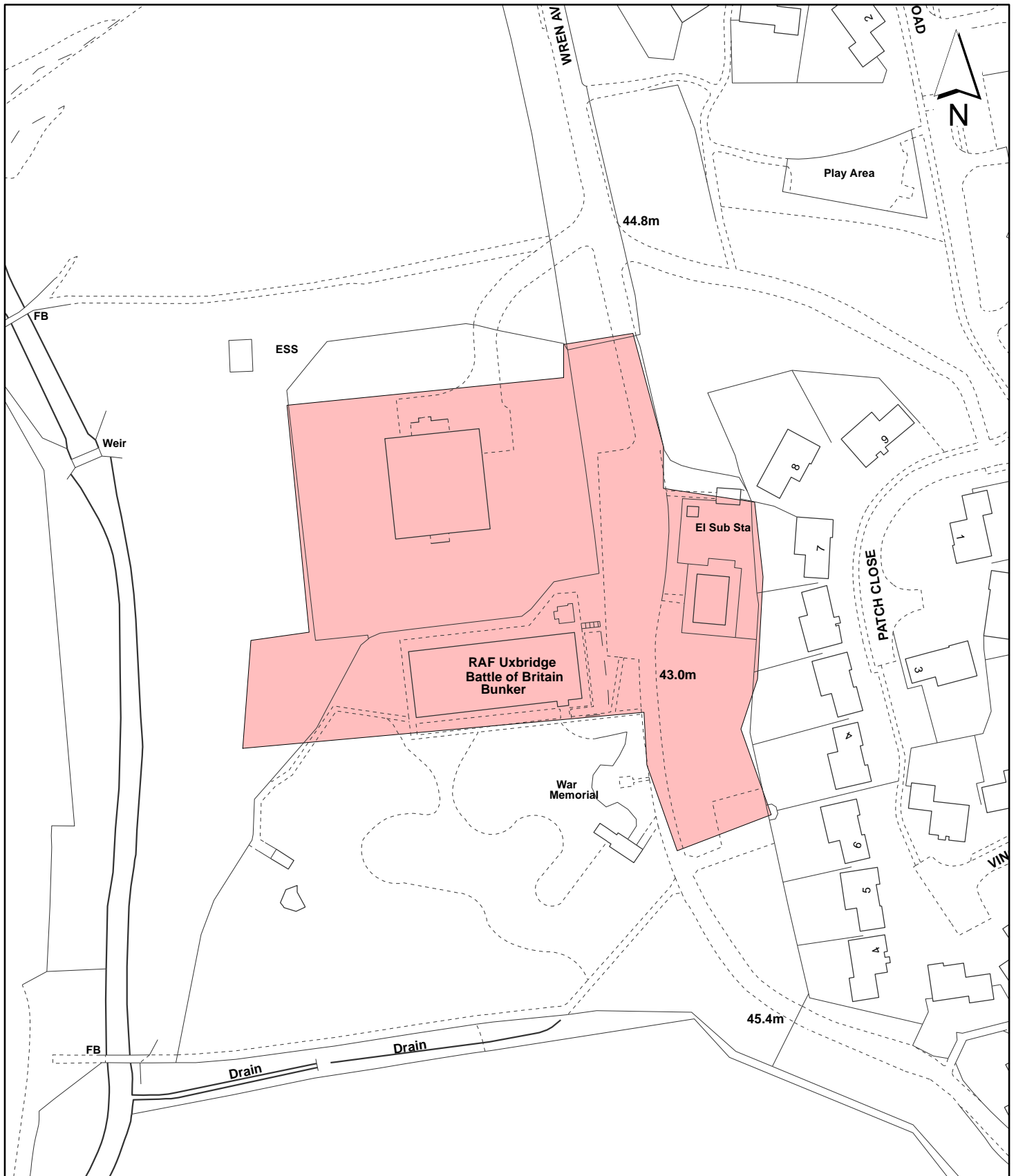
Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)  
London Plan (July 2011)  
Revised Early Minor Alterations to the London Plan (October 2013)





National Planning Policy Framework  
Hillingdon Supplementary Planning Document - Residential Layouts  
Hillingdon Supplementary Planning Document - Residential Extensions  
Hillingdon Supplementary Planning Document - Accessible Hillingdon  
Hillingdon Supplementary Planning Document - Noise  
Hillingdon Supplementary Planning Document - Planning Obligations; and Revised Chapter  
4, Education Facilities: September 2010.  
Hillingdon Supplementary Planning Guidance - Air Quality  
Hillingdon Supplementary Planning Guidance - Community Safety by Design  
Hillingdon Supplementary Planning Guidance - Land Contamination

**Contact Officer:** Peter Higginbottom

**Telephone No:** 01895 250230



<p><b>Notes</b></p> <p> Site boundary</p> <p>For identification purposes only.</p> <p>This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).</p> <p>Unless the Act provides a relevant exception to copyright.</p> <p>© Crown copyright and database rights 2014 Ordnance Survey 100019283</p>	<p>Site Address</p> <p align="center"><b>The Battle of Britain Bunker RAF Uxbridge</b></p>		<p><b>LONDON BOROUGH OF HILLINGDON</b></p> <p align="center"><b>Residents Services Planning Section</b></p> <p align="center">Civic Centre, Uxbridge, Middx. UB8 1UW Telephone No.: Uxbridge 250111</p>
	<p>Planning Application Ref:</p> <p align="center"><b>585/APP/2014/3910</b></p>	<p>Scale</p> <p align="center"><b>1:1,250</b></p>	 <p align="center"><b>HILLINGDON</b> LONDON</p>
	<p>Planning Committee</p> <p align="center"><b>Major</b></p>	<p>Date</p> <p align="center"><b>January 2015</b></p>	