

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

**Address** LAND TO NORTH OF MOORHALL ROAD HAREFIELD DENHAM  
**Development:** INSTALLATION OF GROUNDWATER MONITORING BOREHOLES  
**LBH Ref Nos:** 71180/APP/2015/3252

**Drawing Nos:** Figure 2: Proposed drilling location  
Figure 1: Site location  
Figure 3: Proposed drilling location  
Korda Lake borehole constructor  
Monitoring borehole: Outline Method Statement Mid Colne Valley SS6

**Date Plans Received:** 26/08/2015 **Date(s) of Amendment(s):**

**Date Application Valid:** 26/08/2015

### 1. SUMMARY

This application seeks consent for the installation of three groundwater monitoring boreholes to be installed beneath land to the north of Moorhall Road.

The groundwater monitoring boreholes have been requested by Affinity Water and the Environment Agency to monitor groundwater quality between the Deluxe Site (owned by Denham Media Park) to the west of the site and Affinity Water's nearby public water abstraction well. The boreholes are required in this location, to monitor how groundwater in the wider area may be affected when the abstraction well at Denham Media Park is turned off.

The application has been reviewed by the Councils specialists, who raise no objection to the submissions. The application has been carefully considered in relation to its impact on the surrounding environment and by reason of the largely subterranean nature of the boreholes, is not deemed to have a detrimental impact on the character, appearance, openness and biodiversity of the Nature Conservation Site of Metropolitan or Borough Grade I Importance, Site of Special Scientific Interest, Green Belt or Colne Valley Regional Park. Further, given the location of the boreholes and their distance to the surrounding residential properties, the scheme is not considered to have a detrimental impact on the amenities of any surrounding occupants.

The application is therefore considered to comply with the relevant policies of the National Planning Policy Framework, London Plan Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and approval is recommended.

### 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 Figure 2: Proposed drilling location; Korda Lake borehole construction; Figure 3: Proposed drilling location 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 (2015).

**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:  
Method Statement for Boreholes [Report: Monitoring borehole: Outline Method Statement Mid Colne Valley SSSI]

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 the relevant Policies of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

**4 COM7 Borehole cover design**

Prior to the installation of the covers over the boreholes, detailed plans and/or cross sections shall be submitted to and approved in writing by the Local Planning Authority, which show the design, scale and finish of this element of the scheme. Thereafter the development shall be carried out in accordance with the approved details and be retained as such.

REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy BE13, OL1, OL2 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and EM1, EM7 and BE1 of the Hillingdon Local Plan: Part One - Strategic policies.

**5 COM9 Restoration of land**

Any buildings or structures associated with drilling and installation of the boreholes approved shall be removed once the work is complete and the land restored to its former condition in accordance with a scheme and timeframe of work to be submitted to and approved in writing by the Local Planning Authority.

REASON

To ensure the long term protection of the character, appearance and openness of the Nature Conservation Site of Metropolitan or Borough Grade I Importance, Site of Special Scientific Interest, Green Belt and Colne Valley Regional Park, and to comply with policies EM1, EM7 and BE1 of the Hillingdon Local Plan: Part One - Strategic policies and EC1, OL1, OL2 and OL9 of the Hillingdon Local Plan: Part Two - Saved UDP Policies

(November 2012).

## **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 (2015) and national guidance.

AM7	Consideration of traffic generated by proposed developments.
BE13	New development must harmonise with the existing street scene.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EM6	(2012) Flood Risk Management
LPP 5.14	(2015) Water quality and wastewater infrastructure
LPP 5.15	(2015) Water use and supplies
LPP 7.16	(2015) Green Belt
LPP 7.19	(2015) Biodiversity and access to nature
LPP 7.20	(2015) Geological Conservation
NPPF1	NPPF - Delivering sustainable development
NPPF11	NPPF - Conserving & enhancing the natural environment
NPPF9	NPPF - Protecting Green Belt land
OE1	Protection of the character and amenities of surrounding properties and the local area
OE2	Assessment of environmental impact of proposed development
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements

### **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 (2015). 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.

#### 4 115 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.

### 3. CONSIDERATIONS

#### 3.1 Site and Locality

The site is located to the north of Moorhall Road and is designated as a Nature Conservation Site of Metropolitan or Borough Grade I Importance, Site of Special Scientific Interest, Green Belt and forms part of the Colne Valley Regional Park.

The area where the proposed borehole drilling is proposed is an parcel of land adjacent to Korda Lake. To the west of the site is Broadwater Park, a Business Park located within the South Bucks District. To the south is Savay Lake, to the north is Korda lake and to the east the Grand Union Canal and offices.

#### 3.2 Proposed Scheme

This application seeks consent for the installation of three groundwater monitoring boreholes at a location to the west of Korda Lake. The boreholes are required to monitor groundwater quality between the Deluxe site (owned by Denham Media Park Ltd) and Affinity Water's nearby public water abstraction well.

#### BACKGROUND

There are several deep abstraction wells sunk into the chalk at Denham Media Park, which until recently, provided water for the film processing operations at Deluxe Laboratories, which was located at this site until January 2014. Since the closure of Deluxe Laboratories, the company has been working with the Environment Agency and Affinity Water with regards to turning off the abstraction well at Denham Media Park. The Environment Agency and

Affinity Water are interested to establish how this may affect the groundwater in the wider area and ensure that the other Affinity Water abstraction wells in the area are sufficiently protected.

Affinity Water and the Environment Agency has requested that Deluxe Laboratories Ltd arranges for groundwater monitoring boreholes to be installed. The boreholes are required to monitor groundwater quality between the Deluxe site (owned by Denham Media Park Ltd) and Affinity Water's nearby public water abstraction well. As the borehole has to be suitable for sampling at different depths within the borehole, three separate boreholes are proposed at different depths within the identified area. The drilling of the boreholes will be carried out using either Cable Percussive Drilling or Sonic Drilling. The preferred method for the site is the Sonic Drilling method as this is understood to be faster and quieter, and therefore more appropriate for use within the SSSI.

The plans submitted show two sites labelled A and B of the drawings. Site A, to the west of Korda Lake, is the preferred drilling area and is a triangular clearing approximately 20m by 30m in area. Given the environmentally sensitive nature of the site, works can only occur between September and October to cause least disturbance to either breeding or wintering birds using the lakes and woodland. It is estimated that the drilling works will take between 2-4 weeks after which time, the land will be restored and the boreholes covered with a 1m diameter locked metal cover.

### 3.3 Relevant Planning History

#### Comment on Relevant Planning History

There is no relevant planning history for this site.

## 4. Planning Policies and Standards

### UDP / LDF Designation and London Plan

Part 2 Policies:

The following UDP Policies are considered relevant to the application:

Part 1 Policies:

AM7	Consideration of traffic generated by proposed developments.
BE13	New development must harmonise with the existing street scene.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
PT1.BE1	(2012) Built Environment
EC2	Nature conservation considerations and ecological assessments
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EC3	Potential effects of development on sites of nature conservation importance
PT1.EM7	(2012) Biodiversity and Geological Conservation
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EM6	(2012) Food, Water, Air and Noise
LPP 5.14	(2015) Water quality and wastewater infrastructure
LPP 5.15	(2015) Water use and supplies
LPP 7.16	(2015) Green Belt
LPP 7.19	(2015) Biodiversity and access to nature
LPP 7.20	(2015) Geological Conservation
NPPF1	NPPF - Delivering sustainable development
NPPF11	NPPF - Conserving & enhancing the natural environment
NPPF9	NPPF - Protecting Green Belt land

- OE1 Protection of the character and amenities of surrounding properties and the local area
- OE2 Assessment of environmental impact of proposed development
- 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:- Not applicable

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

## **6. Consultations**

### **External Consultees**

A site notice was erected at the site and no response was received to this consultation.

### **Internal Consultees**

#### **TREES AND LANDSCAPING**

I have no comments/objections to this application.

#### **FLOODWATER MANAGEMENT OFFICER**

I have no objections to the installation of groundwater boreholes at this location to understand the implication on groundwater levels and chemistry in the area of the development of the Deluxe site in South Buckinghamshire, when groundwater abstraction at the site is turned off.

The Council would appreciate the sharing of this monitoring information to the Flood and Water Management Officer in order to inform our groundwater understanding in the area.

## **7. MAIN PLANNING ISSUES**

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

The National Planning Policy Framework (NPPF) states that at the heart of the Framework is a "presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking". Paragraph 109 of the NPPF talks specifically about the need to minimise the impact on biodiversity and minimise the effects of development on the local and natural environment.

Further the London Plan policy 7.19 places great emphasis on development making a positive contribution to the protection and management of biodiversity. This policy seeks to avoid proposals having a detrimental impact on the integrity of important nature conservation sites and states that where they will affect the integrity of such areas, they will be resisted.

The Policy states that where development is proposed that would affect a site of importance for nature conservation or important species, the approach should be to seek to avoid adverse impact on the species or nature conservation value of the site. If that is not possible, then to minimise such impact and seek mitigation of any residual impacts. Where, exceptionally, development is to be permitted because the reasons for it are judged to outweigh significant harm to nature conservation, appropriate compensation should be sought.

Policies 5.14 and 5.15 of the London Plan seek to ensure that water quality is protected and improved, and ensure that the water supplied will not give rise to adverse effects to the environment.

Policy EC1 of the Hillingdon Local Plan: Part Two-Saved Policies states that it will not permit development which would adversely affect the integrity of SSSIs, or be unacceptably detrimental to Sites of Borough Grade I Importance for Nature Conservation.

The type of habitat on site and the connection to other surrounding diverse nature conservation sites, provides an ecology network worthy of strategic protection. The proposed scheme demonstrates that the development could be completed without significant detriment to the recognised ecological value of the area. Applying the hierarchy set out within the London Plan policy 7.19, sufficient information has been received by the Council to demonstrate that the proposal would not cause undue harm to the identified species and nature conservation value of the site, and minimises the impact of the scheme on the area. The boreholes are required to ensure that the water within the area, particularly that going to residential properties, is unaffected by the closure of the well at Denham Laboratories. The need to ensure continued and safe water supply for the residences both within Hillingdon and South Bucks, is considered an exceptional circumstance to allow such a development within the site.

Overall, it is considered that the principle of such a development is considered acceptable.

**7.02 Density of the proposed development**

Not applicable to the consideration of this application.

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

The site is not located within an Area of Archaeological Importance, Conservation Area and Area of Special Character, nor is there a Listed Building located adjacent to or on the site.

**7.04 Airport safeguarding**

Given the subterranean nature of this application, there are no airport safeguarding issues associated with the application.

**7.05 Impact on the green belt**

The National Planning Policy Framework (NPPF) states that inappropriate development is by definition, harmful to the Green Belt, and should not be approved except in very special circumstances. Development should not be approved unless the potential harm to the Green Belt is clearly outweighed by other considerations.

Paragraph 90 of the NPPF identifies a number of forms of development that are also not inappropriate in the Green Belt, provided they preserve the openness of the Green Belt and do not conflict with its purposes. These include engineering operations, of which the development proposed as part of this application could be considered.

Policy 7.16 of the London Plan, states that the strongest protection should be given to the Green Belt and inappropriate development refused, except in very special circumstances. All of the above is reiterated within the Councils adopted policies in both the Hillingdon Local Plan: Part One and Part Two Strategic and Saved Policies.

The installation of the boreholes is considered an engineering operation, and the test in terms of the proposed developments acceptability within the Green Belt, is whether it preserves the openness of the Green Belt and does not conflict with its purposes. The proposed development is largely subterranean and the only visible element of the

development would be three metal covers at ground level covering the boreholes. Given the siting of the proposed development largely below the ground, and need for such monitoring to ensure the long term safety and provision of water to the surrounding residential area, the scheme is not considered to have a detrimental impact on the openness, setting and character of the Green Belt.

#### **7.06 Environmental Impact**

Further the London Plan policy 7.19 places great emphasis on development making a positive contribution to the protection and management of biodiversity. This policy seeks to avoid proposals having a detrimental impact on the integrity of important nature conservation sites and states that where they will affect the integrity of such areas, they will be resisted.

The Policy states that where development is proposed that would affect a site of importance for nature conservation or important species, the approach should be to seek to avoid adverse impact on the species or nature conservation value of the site. If that is not possible, then to minimise such impact and seek mitigation of any residual impacts. Where, exceptionally, development is to be permitted because the reasons for it are judged to outweigh significant harm to nature conservation, appropriate compensation should be sought.

Policy EC1 of the Hillingdon Local Plan: Part Two-Saved Policies states that it will not permit development which would adversely affect the integrity of SSSIs, or be unacceptably detrimental to Sites of Borough Grade I Importance for Nature Conservation.

The site is located within a SSSI, Site of Borough Grade I Importance for Nature Conservation and the Colne Valley Regional Park. The submitted ecological survey has carefully examined the flora and fauna, within both areas proposed for the boreholes, and has identified that the main concerns with the scheme would be the noise disturbance to breeding and wintering birds using the lake and woodlands. To overcome these impacts and ensure that the development has minimal impact on the surrounding ecology, it is proposed that the works are undertaken in September or October. This would then ensure least disturbance to the birds using the lakes and woodland.

As part of the works, the applicants are required to obtain consent also from Natural England to certify that the works proposed would not destroy, damage or disturb features of special scientific interest. Natural England have reviewed the proposed works and methodologies, and are satisfied that provided the works are carried out in accordance with the information submitted, that the scheme would not have an unacceptable impact on the surrounding environment.

Given such, the proposed development is not considered to have a detrimental environmental impact and would accord with the Councils adopted policies and guidance.

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

The site is surrounded on all sides by a dense and established tree and vegetation screen. Given that the development is largely subterranean, the location of the boreholes being in existing clearings/car park, thus not requiring any further vegetation to be removed, the scheme is considered to have an acceptable impact on the character and appearance of the surrounding area.

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

The nearest residential properties to this development are to the south east and east of the site, at Weir Cottage (approx. 275 metres away) and The Horse and Barge Public House



(395 metres away). Whilst it is acknowledged that there may be some disturbance to these residents during the drilling of the boreholes, given that this work is proposed to last for only 2-4 weeks, and the distance of the drilling from these residences, the scheme on balance is considered to have an acceptable impact on the amenities of the surrounding neighbours.

**7.09 Living conditions for future occupiers**

Not applicable to the consideration of this application.

**7.10 Traffic impact, car/cycle parking, pedestrian safety**

The site has its own vehicular access from Moorhall Road and although the monitoring frequency has yet to be agreed with the Environment Agency, it is anticipated that it will involve several monitoring visits each year by 1-2 persons. Given the anticipated frequency of the visits, number of persons likely to attend the visits and designated access to the site, the scheme is not considered to have a detrimental impact on the general highway and pedestrian safety within the surrounding area.

**7.12 Disabled access**

Not applicable to the consideration of this application.

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

Not applicable to the consideration of this application.

**7.14 Trees, Landscaping and Ecology**

It is not proposed to remove any trees/vegetation within the site in order to facilitate this development. The scheme has been reviewed by the Councils Trees and Landscape Officer who raises no objection to the proposed works.

It is likely that the ground around the boreholes may be damaged during the drilling as a result of the machinery, materials and contractors vehicles required to be on site. Given the environmental status of the land, it is considered appropriate that a condition goes onto any consent to ensure its restoration following the completion of the works.

Matters relating to ecology have been addressed elsewhere within the report.

**7.15 Sustainable waste management**

Not applicable to the consideration of this application.

**7.16 Renewable energy / Sustainability**

Not applicable to the consideration of this application.

**7.17 Flooding or Drainage Issues**

There are no flooding or drainage issues associated with this application.

**7.18 Noise or Air Quality Issues**

The main noise disturbance associated with the application will be during the drilling of the boreholes which is expected to last between 2-4 weeks. Whilst it is acknowledged that this could cause noise and disturbance to the surrounding residential properties, it is considered that as the drilling is only for a temporary period, the distance of this from the surrounding residential properties and existing vegetation, the noise disturbance would not be of such a level that would warrant the refusal of the application on these grounds.

**7.19 Comments on Public Consultations**

No comments were received from the public consultation.

**7.20 Planning Obligations**

Not applicable to the consideration of this application.

**7.21 Expediency of enforcement action**

Not applicable to the consideration of this application.

**7.22 Other Issues**

There are no other 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**

Not applicable to the consideration of this application.

**10. CONCLUSION**

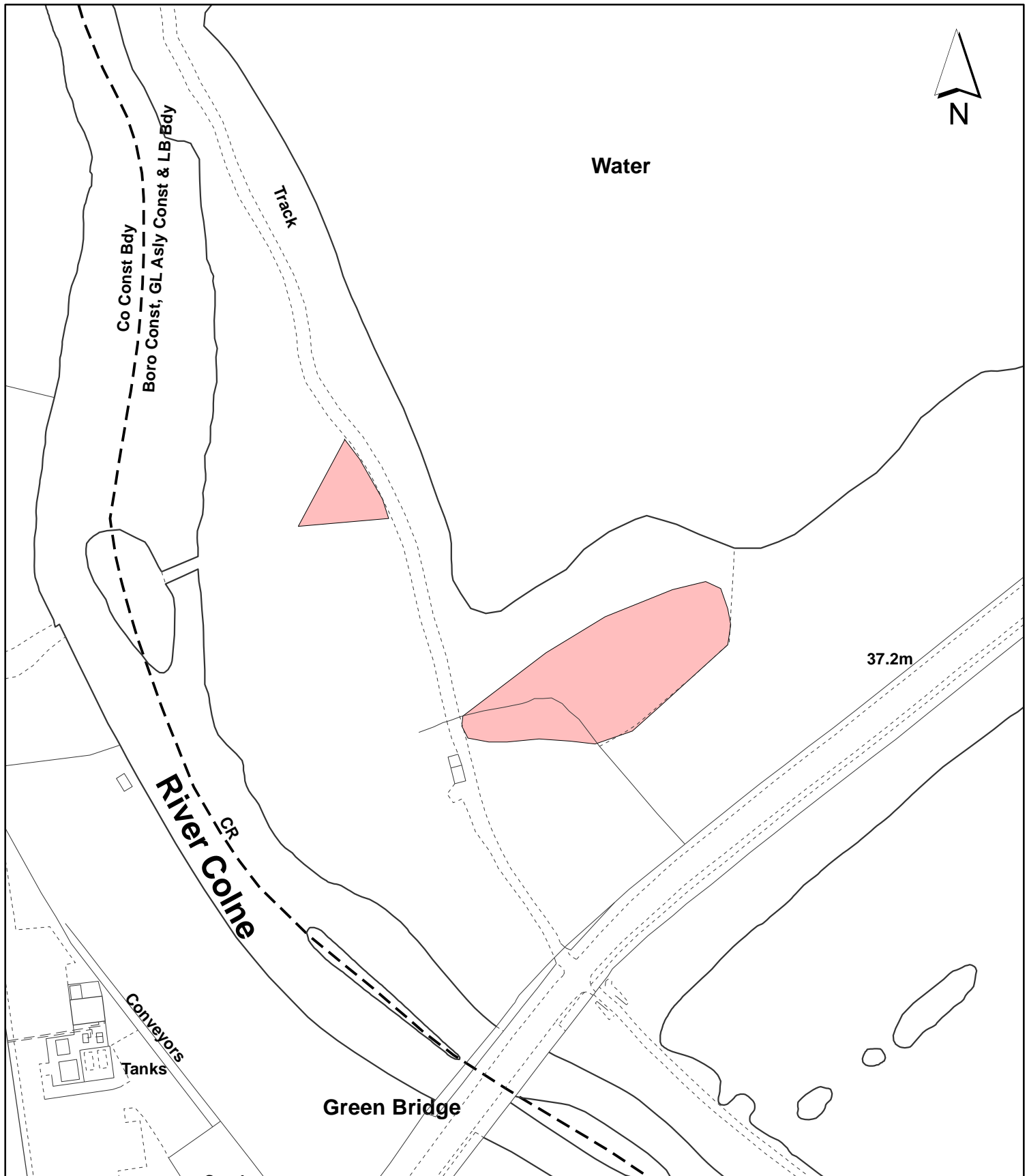
Overall, it is considered that the proposed installation of the boreholes would not have a detrimental impact on the openness, biodiversity, character and setting of the Nature Conservation Site of Metropolitan or Borough Grade I Importance, Site of Special Scientific Interest, Green Belt or Colne Valley Regional Park, or have an adverse impact on the amenities of the surrounding occupiers. The scheme is therefore considered to comply with the relevant policies of the National Planning Policy Framework, London Plan Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

**11. Reference Documents**

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)  
The London Plan (March 2015)  
National Planning Policy Framework 2012

**Contact Officer:** Charlotte Goff

**Telephone No:** 01895 250230



**Notes:**

 Site boundary

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Site Address:

**Land to north of Moorhall Road  
 Harefield  
 Denham**

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

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

Planning Application Ref:

**71180/APP/2015/3252**

Scale:

**1:1,700**

Planning Committee:

**North**

Date:

**October 2015**



**HILLINGDON**  
 LONDON