

Report of the Head of Planning, Transportation and Regeneration

Address	LAND OFF HAREFIELD ROAD UXBRIDGE
Development:	Demolition of existing buildings and erection of 3 blocks (part 4, 5, 8, 9 and 12 storeys) to provide 267 self-contained units (32 x studios, 107 x 1- bedroom, 115 x 2-bedroom and 13 x 3-bedroom) with commercial floorspace at ground floor level (Use Classes A1, A2, A3 and B1) and associated landscaping, including public realm improvements, provision of 9 accessible car parking spaces and ancillary works. (Amendments include design changes and increase of 3 units)
LBH Ref Nos:	16299/APP/2018/1849
Drawing Nos:	Townscape and Heritage Review November 2018 Townscape Visual and Heritage Assessment November 2018 Cover Letter dated 22nd November 2018 (20)_102 P03 (20)_206 P03 ExA_1749_P_120 P03 ExA_1749_P_130 P03 Air Quality Assessment 1983r3 16th November 2018 (20)_205 P04 (20)_212 P03 (20)_110 P04 (20)_200 P04 (20)_202 P03 (20)_203 P03 (20)_204 P03 Flood Risk Assessment 735-TSY-ZZ-XX-RP-S-0001 Issue 1.4 Ambient Noise Assessment J001807/3048/ECE/03 (20)_103 P03 (20)_104 P03 (20)_100 P04 (20)_101 P03 (20)_108 P04 (00)_010 P03 (20)_208 P03 Aviation Assessment 18/778/WAJ/5 November 2018 Daylight Sunlight and Overshadowing Assessment November 2018 Design and Access Statement November 2018 Drainage Strategy Report 735-TSY-ZZ-XX-RP-C-001 Rev02 Landscape Strategy 21st November 2018 (20)_207 P03 (20)_209 P04 (20)_210 P03 (20)_211 P03 Integrated Management Plan (00)_005 (20)_106 P03 (20)_201 P03 ExA_1749_P_102 P04

(20)_105 P03
(20)_107 P03
(20)_112 P02
(20)_109 P05
ExA_1749_P_101 P04

Date Plans Received:	17/05/2018	Date(s) of Amendment(s):	01/08/2018
Date Application Valid:	18/05/2018		17/05/2018
			04/12/2018
			03/12/2018

1. SUMMARY

This application relates to a proposed development on land off Harefield Road in Uxbridge. The proposed scheme involves the demolition of the existing buildings on the site and the erection of 3 blocks, with the tallest block proposed to be 12 stories in height. The development would create 267 self-contained units in the 'Build to Rent' model.

The proposed mix would be 32 x studios, 107 x 1 bedroom, 115 x 2 bedroom and 13 x 3 bedroom units, with commercial floorspace at ground floor level (Use Classes A1, A2, A3 and B1) and associated landscaping, including public realm works, provision of 9 accessible car parking spaces and ancillary works. The proposals have been amended through the application process to increase the level of residential development by 3 units and alter the design of the buildings. This is despite the development having an unacceptably low number of 3 or 4 bed family units and (as highlighted by the GLA) a very high number of small single aspect units.

The proposed scheme is considered to be an over development of the site, resulting in an unacceptable level of density, a detrimental impact on heritage assets and the character of the locality, a detrimental impact on neighbouring residents, insufficient standard of living for future occupiers, unacceptable drainage strategy, waste arrangements, car parking provision and energy strategy. In addition the Ministry of Defence have raised an objection to the application based on the scheme's potential to impact on the safe functioning of radar equipment.

As such the proposed scheme fails to accord with policies contained within the Hillingdon Local Plan: Part 1- Strategic Policies (8th November 2012), Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), the London Plan 2016 and the National Planning Policy Framework (NPPF).

Refusal is therefore recommended.

2. RECOMMENDATION

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

reasons:

1 NON2 Precision Approach Radar

The proposal by virtue of its size, height, siting and design would be likely to interfere with the radar and the safe operations at Northolt Airport. The application is therefore contrary to policy A6 of the Hillingdon Local Plan: Saved UDP Policies (November 2012), Emerging Policies DMAV 1 and DMHB 10 of the Local Plan: Part 2 - Development Management Policies (October 2015), Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Area, Chapter 9, paragraph 104(f) of the National Planning Policy (2018), The Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002 (updated 22 December 2016) and the General Aviation Strategy March 2015.

2 NON2 Regeneration

The proposed development, by reason of its gated access and privately accessible ground floor uses, fails to have ground floor activities that provide a positive relationship to the surrounding streets or make a significant contribution to local regeneration. The proposal is therefore contrary to Policy H1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Emerging Policies DMHB 10 and DMHB 12 of the Local Plan: Part 2 - Development Management Policies (2015), Policy 7.7 of the London Plan (2016) and the National Planning Policy Framework.

3 R8 Density

The proposal, by reason of the scale of development and number of residential units proposed would give rise to an over-intensive use of the site with a density of development that would be out of keeping with and detrimental to the character of the area. Furthermore the scheme has an unacceptably low number of family units (3 bed or more) with many flats being single aspect. The proposal is therefore contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE13, BE19, H4 and H5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Emerging Policies DMH 2 and DMHB 17 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 3.4 of the London Plan (2016) and the National Planning Policy Framework.

4 R4 Car Parking

The proposal does not make adequate provision for car parking in accordance with the Council's adopted standards. This is likely to result in on-street parking displacement to the detriment of highway and pedestrian safety. The proposal is therefore contrary to the Council's adopted policies in particular Policy AM14 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) and Emerging Policy DMT 6 of the Local Plan: Part 2 - Development Management Policies (October 2015).

5 NON2 Heritage

The proposed development by reason of its height, bulk, mass and design represents an overdevelopment of the site that would have an adverse impact that fails to preserve or enhance the setting of the surrounding listed buildings, the Old Uxbridge/Windsor Street conservation area, surrounding locally listed buildings and the North Uxbridge area of special local character. The development would therefore be contrary to Policies BE1, SO1 and HE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE4, BE13 and BE19 of the Local Plan: Part 2 (November 2012), Emerging Policies DMHB 1, DMHB 4 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015) and Policies 7.1, 7.4 and 7.6 of the London Plan (2016).

6 NON2 Character of the Locality

The development, by virtue of its overall scale, bulk of built development, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character or compliment the visual amenities of the street scene and local area and would mar the skyline contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE13 & BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Emerging Policies DMHB 10 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policies 3.5, 7.4 and 7.6 of the London Plan (2016) and the National Planning Policy Framework (2018).

7 NON2 Impact on Neighbours

The proposal, by reason of its scale, mass and design is considered to result in overdominance and have a detrimental impact on the residential amenities of existing residential properties, thus failing to accord with Policies BE19 and BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), the Council's Supplementary Planning Document 'Hillingdon Design and Access Statement' (HDAS), Emerging Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 3.5 of the London Plan (2016) and the National Planning Policy Framework.

8 NON2 External Amenity Space

The proposed scheme fails to provide amenity space of sufficient size, level and quality commensurate to the scale and level of development proposed, resulting in an over-development of the site detrimental to the residential amenity of future occupiers. As such the proposal would provide a substandard form of accommodation for future residents contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE20 and BE23 of the Hillingdon Local Plan: Part Two - UDP Saved Policies (November 2012), Emerging Policies DMHB 10 and DMHB 18 of the Local Plan: Part 2 - Development Management Policies (October 2015) and the adopted Supplementary Planning Document - Residential Layouts SPD (2006).

9 NON2 Internal Privacy Levels and Outlook

The proposed development by reason of its layout and design fails to provide sufficient outlook and privacy for future occupants of the proposed buildings resulting in a development that is detrimental to the amenity of future occupiers of the site. The development would therefore be contrary to Policies BE20, BE21 and BE24 of the Local Plan: Part 2 (November 2012) and Policy 7.1 of the London Plan (2016).

10 NON2 Drainage Strategy

The proposed drainage strategy fails to demonstrate that surface water run off is controlled to ensure the development does not increase the risk of flooding. This is contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Emerging Policies DMEI 9 and DMEI 10 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 5.12 Flood Risk Management, Policy 5.13 Sustainable Drainage and Policy 5.15 Water use and Supplies of the London Plan (March 2016) and the National Planning Policy Framework.

11 NON2 Waste Strategy

The proposed development, by reason of the waste arrangements, has failed to demonstrate that waste can be collected in an acceptable manner and that the residential amenity of future residents would not be detrimentally impacted upon. As such it is deemed to be contrary to Policy EM11 of the Hillingdon Local Plan: Part 1 - Strategic

Policies (November 2012), Policies BE19, BE20, BE21 and BE23 of the Local Plan: Part 2 (November 2012), Emerging Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), London Plan Policy 5.17 and HDAS - New Residential Layouts.

12 NON2 Sustainability

The development fails to satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, contrary to Policy PT1.EM1 of Hillingdon Local Plan Part 1, Emerging Policy DMEI 2 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policies 5.2, 5.13 and 5.15 of the London Plan (2016) and the National Planning Policy Framework.

13 NON2 Landscape

The proposed scheme fails to retain existing trees that are deemed worthy of protection or proposed measures to mitigate against the loss of these landscape features of merit. In addition the level of soft landscaping proposed is deemed to be minimal and insufficient to mitigate the urbanising impact of the development. The scheme therefore fails to satisfy Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), saved policy BE38 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) and Emerging Policies DMHB 11, DMHB 12 and DMHB 14 of the Local Plan: Part 2 - Development Management Policies (October 2015).

14 NON2 Loss of Retail

The proposed development has failed to justify the loss of the existing retail capacity and to demonstrate that options for optimising and enhancing the provision of retail floorspace as part of a mixed use scheme have been considered. As such the proposal has failed to protect and enhance the role of Uxbridge as a Metropolitan town centre. As such it is deemed to be contrary to Policy E4 of the Local Plan: Part 1 - Strategic Policies (2012), Policy 4.8 of the London Plan (2016) and Annex 2 of the NPPF (2018).

15 NON2 Daylight/Sunlight

The application has failed to provide sufficient evidence that the proposed units and proposed amenity areas accord with BRE daylight, sunlight and overshadowing standards as well as details of microclimate for the proposed development. Without such information it is not possible to assess whether the proposed development is suitable for future occupiers. As such the proposal is contrary to Policies BE19, BE20, BE21 and BE23 of the Local Plan: Part 2 (November 2012), Emerging Policies DMHB 10 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015) and the National Planning Policy Framework (2018).

16 NON2 S106

The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Public Realm Works, Travel Plans, Construction Training, Carbon Offset, Affordable Housing, Secure by Design and Project Management and Monitoring). The scheme therefore conflicts with Policy R17 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Emerging Policy DMCI 7 of the Local Plan: Part 2 - Development Management Policies (October 2015) the adopted Supplementary Planning Document 'Planning Obligations and Policy 8.2 the London Plan (2016).

INFORMATIVES

1 I52 Compulsory Informative (1)

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

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - (i) Dial-a-ride and mobility bus services (ii) Shopmobility schemes (iii) Convenient parking spaces (iv) Design of road, footway, parking and pedestrian and street furniture schemes
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
LE4	Loss of existing industrial floorspace or land outside designated Industrial and Business Areas
BE1	Development within archaeological priority areas
BE10	Proposals detrimental to the setting of a listed building
BE13	New development must harmonise with the existing street scene.
BE14	Development of sites in isolation
BE18	Design considerations - pedestrian security and safety
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.

BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE25	Modernisation and improvement of industrial and business areas
BE26	Town centres - design, layout and landscaping of new buildings
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE4	New development within or on the fringes of conservation areas
H4	Mix of housing units
H5	Dwellings suitable for large families
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
R1	Development proposals in or near areas deficient in recreational open space
R16	Accessibility for elderly people, people with disabilities, women and children
R17	Use of planning obligations to supplement the provision of recreation leisure and community facilities
R6	Ancillary recreational facilities
LPP 2.13	(2016) Opportunity Areas and Intensification Areas
LPP 2.15	(2016) Town Centres
LPP 2.7	(2016) Outer London: Economy
LPP 2.8	(2016) Outer London: Transport
LPP 3.11	(2016) Affordable housing targets
LPP 3.13	(2016) Affordable housing thresholds
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.6	(2016) Children and young people's play and informal recreation facilities
LPP 3.8	(2016) Housing Choice
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.12	(2016) Improving opportunities for all
LPP 4.4	(2016) Managing Industrial Land and Premises
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking

LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2016) Cycling
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 8.3	(2016) Community infrastructure levy
LPP 8.4	(2016) Monitoring and review

3 171 LBH worked applicant in a positive & proactive (Refusing)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the 'Saved' UDP 2007, Local Plan Part 1, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service.

In order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably. In addition further guidance was offered to the applicant by the case officer during the processing of the application to identify the amendments to address those elements of the scheme considered unacceptable. However, the amendments required to make the application acceptable are substantial and would materially change the development proposal. They would require further consultation to be undertaken prior to determination which could not take place within the statutory determination period specified by the Department of Communities and Local Government. You are therefore encouraged to consider the submission of a fresh application incorporating the material amendments set out below which are necessary to make the scheme acceptable.

4 174 Community Infrastructure Levy (CIL) (Refusing Consent)

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. For more information on CIL matters please visit the planning portal page at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

3. CONSIDERATIONS

3.1 Site and Locality

The site is located alongside Harefield Road, which is recognised as a local distributor road. The site level is raised approximately 1.2 metres above the level of Harefield Road. The site begins to slope gently downwards towards the rear (south-east).

The site is currently occupied by two attached purpose built retail buildings. The design of the buildings is relatively utilitarian, particularly 10 Harefield Road, which is the larger of the two and is largely metal clad. 12 Harefield Road does include a certain degree of decorative brickwork including pillars decorative courses. The overall footprint of unit 10 is approximately 2420 m² and unit 12 is approximately 730 m².

Both buildings are currently occupied by retail uses with 10 Harefield Road accommodating a DIY store and 12 Harefield Road accommodating a bike and car accessories store. Each unit is single-storey but sections of mezzanine flooring have been provided for office and / or addition retail space. The overall amount of retail space provided within each unit has not been confirmed.

The site is self contained and is served by its own car parking area which is provided to the front of the buildings. The parking is controlled by a private company and is for use by customers only.

The site is accessed directly from Harefield Road via a purpose built junction and a two-way access road. A turning bay has been marked out on Harefield Road to accommodate waiting vehicles that are turning right into the site. The access road continues along the southern side of the buildings, servicing a yard and loading area to the rear of the shops and then looping to the west to join with Warwick Place. Access from Warwick Place is currently controlled by a gate.

The site has been landscaped. This includes mature trees and hedging planted around the fringes of the car parking behind the brick retaining wall that faces on to Harefield Road and continuing around the remaining edges of the car park, other than adjacent to the retail units. There are also landscaped parcels and individual trees within the car park and a belt of mature trees providing a buffer between the retail buildings and the rear of gardens belonging to dwellings on Lancaster Road to the north-east.

Part of the Old Uxbridge / Windsor Street Conservation Area, which consists of shops on the eastern side of the High Street, lies approximately 60 metres to the south-west of the site. A number of the shop buildings within the Conservation Area are Listed. Approximately 225 metres to the west are the Uxbridge Lock and Rockingham Bridge Conservation Areas, which comprise of canal side landscaping and development. The North Uxbridge Area of Special Character extends to the north east of the site. 13 and 15 Lancaster Road, which back on to the eastern site boundary, are included within the Area of Special Character.

Watts Hall, a former chapel which is a Grade II Listed Building, is located close to the site, where the access road meets Warwick Place. Part of the magistrates court, which is to the west of the site on the opposite side of Harefield Road, is locally listed.

The site lies within an Archaeological Priority Area.

The buildings immediately adjacent to the site include Uxbridge Police Station, a 3-storey building on lower lying land to the west, Beasley Court which is a 4-storey office building adjacent to the access from Warwick place to the south. To the north-east is a group of light industrial units on what is known as the Penfield Estate and the rear boundaries of gardens belonging to the terraced and semi-detached dwellings that line Lancaster Road.

The site is located within the northern end of Uxbridge Town Centre which extends towards the west, where the majority of development consists of office buildings and to the south

where the main concentration of retail is. The site itself does not fall within a primary or secondary shopping centre. Tall buildings within Uxbridge are concentrated towards the perimeter of the town centre, generally towards the north and west. The majority of these buildings contain offices although there are also residential buildings including the 8-storey building currently under construction at the Fassnidge site, approximately 150 metres south-west of the proposal site and Denham Lodge which is a 10-storey residential tower block approximately 350 metres to the west, which falls just outside of the Borough.

The site has a PTAL score of 5 and is within walking distance of Uxbridge bus and train stations.

3.2 Proposed Scheme

The proposal involves the demolition of all existing buildings on site and replacement with a mixed use development consisting of predominantly residential units. The proposals have been amended through the course of the application process, with the submission now proposing three separate blocks that would provide 267 units within the 'Build to Rent' model. Block A is proposed to be 4 stories in height on the Harefield Road frontage and up to 8 stories behind. Block B would be up to 4 stories and located on the north eastern boundary of the site. Block C would be 9 stories on the south eastern site boundary and up to 12 stories in height off the boundary.

The unit mix proposed would be as follows:

32 Studios - 12%

107 no. 1 Beds - 40%

115 no. 2 Beds - 43%

13 no. 3 Beds - 5%

10% of the total are proposed to be accessible units.

Also proposed are 2 no. commercial units that would have a floor area of 254 sqm and 178 sqm. These units seek consent for Use Classes A1, A2, A3 and B1. The larger of the two commercial blocks would be located within Block A on the Harefield Road frontage, whilst Block C would contain the second smaller unit. Both units would be positioned on the ground floor. It is proposed that Block C would include communal facilities to serve the development at ground floor level. These facilities include a lounge and gym, which the supporting documentation submitted with the application states will be accessible to all residents within the development. These facilities would not therefore be available to the wider general public.

The development proposes a total of 9 parking spaces, all of which would be located at ground floor level in Block C and would be disabled spaces. This equates to a parking ratio of 0.03 spaces per unit. Vehicular access to the site would be off Harefield Road as existing. An internal road within the site is described as 'shared surface' and provides access to the parking and a turning head. Also proposed are 457 cycle spaces, including 8 visitor spaces. The cycle parking would be located in three smaller locations and one larger area in Block C. No motorcycle parking is proposed. It is proposed that the site be gated with access for residents only.

Two child's play space areas are proposed at either end of the access road turning head, these would be 119 sqm and 60 sqm in size with associated play equipment. Residential amenity space is proposed to be provided with Block A designed around a courtyard space. Roof terraces would be provided within Block A at level 5 and within Block C at

levels 1, 4, 7 and 8. Within Block C, the units which back on to the roof terrace would have a private external area with direct access to the roof terrace. 110 of the proposed units would also benefit from private balconies. Additional soft landscaping is proposed at ground floor level. In total 2226 sqm of external amenity space is proposed for the 267 units.

The proposal would allow the Warwick Place loop to be accessible to pedestrians, providing a pedestrian route to the site that could gain wider connectivity to the High Street by way of linking with Beasleys Yard. This would, however, need to be agreed with a third party as Beasleys Yard is privately owned, therefore this route could be closed at any time outside the control of the developer.

3.3 Relevant Planning History

Comment on Relevant Planning History

The site has extensive planning history related to its current commercial use such as advertisement consents which are not significant and relevant to the current scheme. There is no planning history relevant to the proposed residential led development.

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.EM6 (2012) Flood Risk Management
- PT1.BE1 (2012) Built Environment
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.H1 (2012) Housing Growth
- PT1.H2 (2012) Affordable Housing
- PT1.HE1 (2012) Heritage

Part 2 Policies:

- LDF-AH Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
- HDAS-LAY Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
- AM13 AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): -
 - (i) Dial-a-ride and mobility bus services
 - (ii) Shopmobility schemes
 - (iii) Convenient parking spaces
 - (iv) Design of road, footway, parking and pedestrian and street furniture schemes
- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons
- AM2 Development proposals - assessment of traffic generation, impact on congestion

	and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
LE4	Loss of existing industrial floorspace or land outside designated Industrial and Business Areas
BE1	Development within archaeological priority areas
BE10	Proposals detrimental to the setting of a listed building
BE13	New development must harmonise with the existing street scene.
BE14	Development of sites in isolation
BE18	Design considerations - pedestrian security and safety
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE25	Modernisation and improvement of industrial and business areas
BE26	Town centres - design, layout and landscaping of new buildings
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE4	New development within or on the fringes of conservation areas
H4	Mix of housing units
H5	Dwellings suitable for large families
OE1	Protection of the character and amenities of surrounding properties and the local area
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LPP 2.13	(2016) Opportunity Areas and Intensification Areas

- LPP 2.15 (2016) Town Centres
- LPP 2.7 (2016) Outer London: Economy
- LPP 2.8 (2016) Outer London: Transport
- LPP 3.11 (2016) Affordable housing targets
- LPP 3.13 (2016) Affordable housing thresholds
- LPP 3.3 (2016) Increasing housing supply
- LPP 3.4 (2015) Optimising housing potential
- LPP 3.5 (2016) Quality and design of housing developments
- LPP 3.6 (2016) Children and young people's play and informal recreation facilities
- LPP 3.8 (2016) Housing Choice
- LPP 3.9 (2016) Mixed and Balanced Communities
- LPP 4.12 (2016) Improving opportunities for all
- LPP 4.4 (2016) Managing Industrial Land and Premises
- LPP 5.10 (2016) Urban Greening
- LPP 5.11 (2016) Green roofs and development site environs
- LPP 5.12 (2016) Flood risk management
- LPP 5.14 (2016) Water quality and wastewater infrastructure
- LPP 5.15 (2016) Water use and supplies
- LPP 5.2 (2016) Minimising Carbon Dioxide Emissions
- LPP 5.21 (2016) Contaminated land
- LPP 5.3 (2016) Sustainable design and construction
- LPP 6.10 (2016) Walking
- LPP 6.13 (2016) Parking
- LPP 6.5 (2016) Funding Crossrail and other strategically important transport infrastructure
- LPP 6.9 (2016) Cycling
- LPP 7.1 (2016) Lifetime Neighbourhoods
- LPP 7.14 (2016) Improving air quality
- LPP 7.15 (2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
- LPP 7.2 (2016) An inclusive environment
- LPP 7.4 (2016) Local character
- LPP 7.5 (2016) Public realm
- LPP 7.6 (2016) Architecture
- LPP 8.3 (2016) Community infrastructure levy
- LPP 8.4 (2016) Monitoring and review

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **27th June 2018**

5.2 Site Notice Expiry Date:- Not applicable

19th June 2018

6. Consultations

External Consultees

1ST CONSULTATION PERIOD

This application has been subject to design amendments through the course of the application process which resulted in the need to re-consult on the proposals. The first consultation period was between 24-05-18 and 14-06-18 and the following were received:

5 Petitions in objection to the proposals
142 comments in objection
46 comments in support

Petitions received in objection stated the following:

Petition 1 has 55 signatures and states:

'We, the undersigned, object to planning application of three residential blocks (264 self-contained units with 9 parking spaces). Main points of concern are:

- Over-development/ over-crowding/ heavy traffic
- Abuse of resident parking
- Size and bulk too dominant
- Over-bearing for nearby residents (shading/noise)

Petition 2 has 35 signatures and states:

'We the undersigned object to planning application 16299/APP/2018/1849 for the car-free development of 264 self contained residential units on land off Harefield Road, Uxbridge on the grounds that it is too large, too high, questionable as a car-free option, adds pressure to already overloaded public services and involves the loss of two valued retail outlets'.

Petition 3 has 103 signatures and states:

'The undersigned object to the development of the Harefield Road site and believe the local character of the area will be affected adversely by the scale and bulk of the development which will dominate the surrounding residential streets. It does not relate well to the form, proportion, and composition of surrounding buildings. The proposed site density is overwhelming and seems designed with that in mind and will have an adverse impact on residential amenity, increasing noise, overlooking of existing residents, loss of privacy and overshadowing. The proposal will increase pressure on schools, doctors and other services which are already under pressure.

Surrounding residential streets have parking difficulties and a car free scheme easily circumnavigated will spread the issue into a wider area.

The removal of two retail units that provide well used useful service to local residents and businesses, otherwise not available in the town, will mean a considerable journey to find alternatives'.

Petition 4 has 26 signatures and states:

'Against proposed development of the Wickes/Halford site for 264 build to rent residential apartments'

Petition 5 has 43 signatures and states:

'We, the undersigned, object to planning application 16299/APP/2018/1849 for development at land

off Harefield Road, Uxbridge on the grounds that it is too large, too high, questionable as a car-free option, adds pressure to already overloaded public services and involves the loss of two valued retail outlets'.

142 comments in objection are summarised as follows:

- no requirement for more homes with lots of existing development in the area
- overlooking/loss of privacy
- out of context
- excessive scale/overdevelopment
- insufficient parking
- increased pressure on existing parking
- increased pressure on local services
- insufficient affordable housing
- affordable housing could be rented out
- impact on character of the area
- impact on local community
- too many additional people for the high street
- loss of outlook
- increased pedestrian congestion
- loss of security
- lack of recreational opportunities for existing residents
- impact on property values
- loss of jobs
- loss of existing stores and services
- increased traffic
- impact on pedestrian safety
- increased anti-social behaviour
- increased noise
- increased pollution
- loss of light
- ill considered design/eyesore
- unsustainable development
- interference to TV and radio signals
- no right of way through Beasley's Yard, gates locked evenings and weekends
- generated vistas are misleading and do not take the topography into account
- buildings very dark and oppressive
- There is no building in North Uxbridge residential area which is taller than 6 floors
- mix of development impractical to commute to/from using public transport
- danger to pedestrians and vehicles in Beasley's Yard
- lack of public consultation
- leaflet dropping for "local thoughts in area" nowhere near to the development
- justification is based on draft policy
- damage to properties
- human lives at risk
- increased crime/increased fear of crime
- inability to dry washing in constant shade/damp conditions
- unable to work from home risking loss of employment
- approval would not be "Putting Our Residents First"
- public transport only available to those going east
- supposedly car free, but people still have deliveries, order take aways, taxis and have visitors etc
- no benefit to local community
- detrimental impact on 17th and 18th century buildings
- would result in creeping urbanisation
- insufficient provision for servicing

- density is too high
- using existing sewage and water supplies
- more appropriate in Central London
- no provision for renewable energy
- the architecture would also appear to be rather "brutalist"
- all the properties are buy to rent
- insufficient accessible car parking spaces available
- impact on air quality
- London Borough of Hillingdon has exceeded targets for provision of new homes
- another Glenfield Tower in the making
- existing developments have not been filled yet
- excessive cycle parking provision
- units too small
- documents are misleading
- gated access doesn't make it feel part of the what is a strong community
- losing stores locally will lead to increased journeys
- inappropriate use
- loss of retail diversity
- loss of existing car park
- precedent to close other retail premises
- market town becoming a concrete jungle
- contrary to London Plan policies
- contrary to Hillingdon planning policies
- past record of developer
- inappropriate materials
- query process used in daylight/sunlight report

The 46 comments received in support can be summarised as:

- Because it give more option
- modern look to Uxbridge
- close by living area
- good location
- encourages less pollution with no car park
- better to have a accommodation for student outside the campus
- students won't face much of an issue finding a place to live
- good idea. Need to see how it goes
- I am for it
- build to rent welcomed in this area, creates more housing options
- support if affordable
- too many houses built on green belts
- need more flats for renting
- would eliminate issues such as slow maintenance
- support if benefits students
- it would be nice to have a reliable landlord

2ND CONSULTATION PERIOD

The second consultation period was between 04-12-18 and 11-01-19 and the following were received:

143 comments in objection can be summarised as follows:

- increased traffic
- impact on highways safety
- damage to vehicles
- lack of parking

- loss of retail stores
- loss of incentive for people to visit Town Centre
- blot on the landscape
- detrimental impact on character of the area
- lots of new development in locality, no need for more
- too dense
- takes no account of surroundings
- situated close to many 17th and 18th century buildings
- creeping urbanisation of an ancient market town
- will dominate the skyline to a completely unacceptable extent
- pressure on local services
- poor design
- impact on existing residents parking
- will cause major disruption
- impact on residential amenity
- will cause gridlock
- pollution levels
- already too many new flats going up in the area
- less money coming in locally
- no real thought to the local demographic
- no investment in local infrastructure
- more family homes needed instead
- developer is only interested in financial gain
- overlooking
- loss of privacy
- not in keeping
- proposal relies upon draft policies
- delivery vehicles and services such as careers/visitors to use public car parks is unrealistic
- lack of school places
- maximum in this area should be 5 stories in keeping with other residences on the street
- loss of light
- increase in crime
- impact on property prices
- lack of green space
- overbearing influence
- public transport won't cope
- sewage system won't cope
- adverse effect on local economy
- no benefit to the exciting local community
- over population of an already very congestion centre
- not inkeeping with local conservation area
- flats will be bought by investors
- will have to travel further for supplies
- excessive cycle parking provision
- noise disturbance
- insufficient and unsafe road access
- past record of developer
- inappropriate materials
- contrary to London Plan policies
- contrary to Hillingdon planning policies
- query process used in daylight/sunlight report
- will cause problems for emergency vehicles
- loss of outlook
- inability to dry washing in constant shade/damp conditions

- unable to work from home risking loss of employment
- lack of infrastructure
- is there a commitment how long they will employ the 7 members of staff plus cleaners?
- increased carbon footprint
- buy to let does not engender good, long term community spirit

EXTERNAL CONSULTEES

GREATER LONDON AUTHORITY (GLA) (summary)

On 4 June 2018 the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

London Plan policies on housing and affordable housing, urban design, heritage, inclusive design, climate change, flood risk, drainage and water and transport are relevant to this application. The following issues should be considered:

- Land use: Land use principle: The principle of a residential led mixed use development on the site is supported.
- Housing and Affordable Housing: The affordable housing offer is currently 23% calculated by habitable room. The affordable tenure is currently all DMR at 80% of market rent. The current affordable housing offer is unacceptable and must be improved. The applicant is following the viability tested route and GLA viability experts are currently scrutinising this and negotiating the level of affordable housing.
- Urban design and heritage: the approach is generally supported. There are currently too many single aspect units proposed and not a sufficient number of the units benefit from private external space and should be reconsidered.
- Inclusive design: location of units should be confirmed.
- Climate change: CHP is not appropriate, and an alternative solution should be found. Overheating analysis should be provided. The potential to provide more PV should be explored.
- Flood risk, drainage, and water: further details required on SuDs; additional work is required to meet water consumption targets.
- Transport: EVCP's for all car parking should be provided and details on how an additional 7% of dwellings could be provided with a disabled persons parking bay upon request should be included within a Parking Design and Management Plan. End of journey facilities for employees travelling to the site by active modes should be provided and at least 5% of cycle parking facilities should be able to accommodate larger and adapted cycles in accordance with the LCDS. A detailed CLP, DSP and Travel Plan should be secured by condition/s106 as appropriate.

Recommendation

That Hillingdon Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 81 of this report; but that the possible remedies set out in this report could address these deficiencies.

NORTH UXBRIDGE RESIDENTS ASSOCIATION

Our Association has been advised of several petitions against the proposed redevelopment and wish to add our committee's objection in full support of the petitions and to offer our objections:

A) Present Use

The existing retail uses provide a valuable function as an adjunct to the Town Centre retail core and do not require site redevelopment on grounds of the buildings being vacant or visually derelict.

B) Site Location

Although categorised in the local Plan as part of the Town Centre, its location is more appropriately considered as a transition between the Town Centre and the Harefield Road residential area. As such it is particularly important that this site should respect the scale and size of housing in Harefield Road, Lancaster Road & Wilmar Close.

C) Policy Framework

In making this application, major reliance has been placed on the Mayor's Draft London Plan which aims to radically increase the annual new build target in Hillingdon from some 500 in the adopted London Plan to some 1500 pa. Until formally agreed, the Draft figure should not be used as the justification for the proposal to be supported.

D) Tall Building Approach

Likewise as part of the submission, the scheme relies upon the Tall Buildings Policy 7.7 in the Adopted Plan which says inter alia "only to be considered in areas whose character would not be affected adversely by scale, mass or bulk of tall or large buildings". This is very much the case here, where the proposal would have a significant visual intrusion in the street scene and overbearing impact on houses around the site.

E) Parking Provision

The assumption that RtL (units to let) can be car free within PTAL 5&6 locations may be credible for inner city London sites but not at London's perimeter, where:

- car ownership is the norm with easy access to the motorways and in light of this,
- there is a potential, but likely, abuse of the limited kerbside parking by future occupiers if none are provided on site.

Whilst a relaxed standard of less than 1 on-site space per unit can be argued because of the site's proximity to public transport, the site is elevated above Harefield Road so there is an obvious option of excavation to provide a parking deck accessed at road level. Indeed earlier renditions of the scheme did indicate some 55 spaces.

NURA asserts that car parking should be provided for each unit, made possible by reducing the overall numbers. This will also bring the development down to a scale compatible with the site's transitional location between the Town Centre and the housing area to the north.

F) Impact upon Adjoining Properties

Nearby housing may well be adversely affected by overshadowing particularly in the late afternoon and Block B will also cause loss of privacy, notably to Lancaster Road houses and gardens.

G) Pressure on Public Service

One continuing theme in the comments we have received from residents is the pressure on public services such as overload at GP surgeries, and their obvious alarm that this scheme would only make matters worse.

Conclusion

Nothing in the scheme suggests a material benefit to the existing community, rather the converse. Irrespective of the other issues, the overall street scene impact and dominance envisaged by 8, 9 & 12 storey blocks, the scheme must be resisted as being incompatible with local residential amenity.

We consider this to be a poorly conceived and insensitive proposal, which if approved in anything like its present height, mass or bulk, would result in a precedent for similar proposals.

HISTORIC ENGLAND

Our specialist staff have considered the information received and we do not wish to offer any

comments on this occasion. This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

SPORT ENGLAND

No objection

HEATHROW AIRPORT SAFEGUARDING

We have assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

MOD - DEFENCE INFRASTRUCTURE ORGANISATION

The application site is positioned within the Uxbridge area and lies approximately 3.46km to the west of the end of the main runway at RAF Northolt. The site occupies the aerodrome height, birdstrike and technical statutory safeguarding zones surrounding the aerodrome.

Aerodrome heights

The proposed development site occupies the statutory aerodrome height safeguarding zone which protects the Obstacle Limitation Surface surrounding RAF Northolt; this is in place to ensure air traffic approaches, take offs and manoeuvres are not impeded. Following a review of the proposal, I can confirm that we have no aerodrome height safeguarding concerns with this development.

Technical

The proposed development site is also within the safeguarding area protecting the operation of the Instrument Landing System (ILS) and the Precision Approach Radar (PAR) that surveys the Western approach to the main runway at RAF Northolt. Due to the height of the proposed residential blocks, performance of the PAR will be affected by this development; the MOD therefore objects to this application in its current form.

We note that the applicant has submitted an aviation report in support of the application (Harefield Road Development, Uxbridge: Assessment of Impact on Heathrow Airport and RAF Northolt dated March 2018). The report considers the impact of the development on the PAR at RAF Northolt and states that as there are existing buildings in the area which would shield the building from the radar and will therefore cause no impact to the radar. However, none of the existing buildings identified in the report lie between the radar and the development site so therefore these buildings would not shield Harefield Road from the radar.

Birdstrike

The development site also occupies the statutory birdstrike safeguarding zone surrounding RAF Northolt. Within this zone the principal concern of the MOD is with the creation of new habitats which may attract and support populations of birds hazardous to air traffic. The development at Harefield Road will feature a biodiverse brown roof which has the potential to attract birds hazardous to air traffic.

We note that a Bird Hazard Management Plan (BHMP) has been submitted in support of the application to satisfy Heathrow Airports birdstrike safeguarding requirements. The MOD also has birdstrike safeguarding requirements so the plan should be amended to include reference to the RAF and RAF Northolt and should commit to disperse birds at the request of RAF Northolt as well as Heathrow Airport.

The plan needs to clearly identify the key species which are to be dispersed and needs to include records of actions taken and outcomes as well as details of inspections where no hazardous birds were found. Should our objection to this application be removed, we would require a condition to be included in any planning permission granted obligating the applicant to comply with the requirements of the BHMP.

Cranes

Finally, the MOD recognises that cranes may be used during the construction of tall buildings at this site, if this development does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures. If the applicant can overcome our statutory objection to this scheme we would request that a condition such as the one below is included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting). The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

Noise

Please also note that my MOD colleagues have submitted separate representation commenting on the Noise Impact Assessment for this development. This letter on Safeguarding matters should be read in conjunction with my colleague's response.

In summary, the MOD maintains a statutory objection to this proposal in its current form.

METROPOLITAN POLICE DESIGNING OUT CRIME OFFICER

There is a risk of crime within both the public and non-public areas of the proposed development, and the interaction between the two should be considered from the outset.

Consideration of preventative security measures should be made to reduce crime and the fear of crime for any new development, which will aid sustainability and allow an area to thrive. There are three general desires of any design out crime officer (DOCO) when looking at any development and they are to:-

1. Reduce Permeability. There should be no route between buildings, associated car parks and roof spaces/gardens. Or multiple ways in to a development that reduce activity making them isolated and vulnerable.
2. Increase Surveillance. Where possible utilise both natural and formal surveillance (CCTV), with uniform levels of lighting and flat unobstructed landscaping to increase levels of surveillance, where at all possible.
3. Increase Territoriality. Providing a perimeter treatment around aspects of the development to project out from the building line and define use of the land.

Crime prevention and community safety are material considerations. If the London Borough of Hillingdon are to consider granting consent, I would ask that the conditions and information detailed below be attached. This is to mitigate the impact and deliver a safer development in line with national, regional and local planning policies. I would also like to draw your attention to Section 17 Crime and Disorder Act 1988 and the NPPF, in supporting my recommendations.

(1) Prior to carrying out above grade works of each building or part of a building, details shall be

submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve full Secured by Design Accreditation. The development shall only be carried out in accordance with the approved details.

(2) Prior to the first occupation of each building or part of a building or use, a Secured by Design accreditation shall be obtained for such building or part of such building or use.

This would ensure that appropriate security accredited products are installed, and the layout remains suitably arranged to prevent such crimes as burglary. To achieve the proposed conditions and recommendations, the services of the Police Designing Out Crime Officers (DOCOs) are available free of charge. The DOCOs can be contacted via the details shown above.

Additionally, I would like to bring to your attention an area that directly neighbours this site, which will be affected if this planning application is approved. 126 High Street, Beasley's Yard is a pathway that runs next door to McDonalds on the High Street. The design of this development will result in increased footfall in this area because it will be the most direct route from the proposal site to the High Street.

At present this area suffers from anti-social behavior and drug use, this is in part due to its close proximity to a number of licensed premises and McDonalds, but largely down to its design as it suffers little natural surveillance or activity and can be accessed from two directions. At present this footpath is not heavily used, and as Uxbridge police station is within about 30 metres, it naturally gets a lot of police patrolling it, however with Uxbridge police being scheduled for closure within the next few years, there is clearly potential for the existing issues to worsen, and this development will bring lots of people to the area who will be subjected to this potential crime, and I fear that the increase in footfall will be enough to put those people at risk but not enough to provide enough natural surveillance and activity to significantly improve the area.

Therefore I would suggest that S106 money generated from this development, is used to improve this area. At present the lighting is poor, it is positioned too low, lacks uniformity and is gloomy. I recommend this lighting is improved, so that it is a minimum of 30 Lux on average, has a uniformity score of at least 40, and a colour rendering index score of at least 60. The lights should be positioned at least 3 metres above ground.

This gate is currently opened and shut in the morning and evening, however I would also strongly recommend that the gate is replaced with a LPS 1175/Issue 7 SR1 rated gate that is 2.1 metres in height, that has a default position of closed with access control only giving access to those that require it.

It would also benefit from the installation of a CCTV camera that is actively monitored by the London Borough of Hillingdon CCTV department.

METROPOLITAN POLICE DESIGNING OUT CRIME OFFICER 2ND comments

I have commented on this site recently, and the amendments do not change the comments I made previously. Please refer to my original comments in relation to this application.

LONDON UNDERGROUND

I can confirm that London Underground Infrastructure protection has no comment to make on this planning application.

NATIONAL AIR TRAFFIC SERVICES (NATS)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our technical safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company (NERL) has no safeguarding objection to the proposal.

THE GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (GLAAS)

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

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.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan.

The applicant's archaeological desk-based assessment shows that remains of a Bronze Age settlement and land boundary ditches were found during an investigation conducted in 1993-4. These are part of an extensive Bronze Age landscape covering much of the Lower Colne Valley. There appears to be a trackway aligned on the natural crossing point over the Colne at the site of the medieval bridge. The eastern and central parts of the site were investigated and ground levels subsequently reduced so there is very limited potential in these areas. However, the western part of the site was not investigated and may have greater surviving potential. Any surviving remains would be harmed by the proposed new build.

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:

Condition

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

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

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

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

WSI.

Informative

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

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

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

For part 1 of the condition trial trenches should be excavated in the western part of the site to establish if significant remains survive. If these trenches do discover significant remains then further investigation would be required under stage 2.

Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.

DEFENCE INFRASTRUCTURE ORGANISATION (NOISE)

The proposed development site lies within 5 km of the centre of the runway at RAF Northolt. With regard to non-statutory matters the MOD have the following comments;

Noise.

Whilst the application is supported by a noise assessment a very minimal measurement period has been used for such a large scale development which covers a single 13 hour, night-time monitoring period.

The MOD considers is that the submitted noise report would be unlikely to be sufficient for assessing the impact on future occupiers for general environmental noise and it is noted that the noise survey was carried out overnight at a time when aircraft activity from RAF Northolt was extremely low, with less than 20 aircraft movements in the monitored period where a typical day would see significantly more.

The MOD considers that the submitted information with regard to noise is inadequate and needs to be revised to include a more extensive noise monitoring period which covers times at which there is likely to be a more typical level of activity at RAF Northolt.

DEFENCE INFRASTRUCTURE ORGANISATION (NOISE) 2nd comments:

With regard to our previous comments regarding the need for noise from RAF Northolt to be taken into account in the assessment of the application the applicant appears to have provided no additional evidence regarding this matter and has simply contended that the noise monitoring duration was sufficient to assess the impact.

As the noise monitoring was undertaken for an extremely short period of time and principally over a weekend period when activity at the aerodrome was low it is not agreed that adequate noise monitoring was undertaken or that potential for noise from RAF Northolt has been adequately

assessed within the submitted noise report.

Case Officer's comments:

Following receipt of the above comments the applicant has provided a revised Ambient Noise Assessment (Ref. J001807/3048/ECE/03) which was forwarded to the DIO for consideration.

DEFENCE INFRASTRUCTURE ORGANISATION (NOISE) 3rd comments:

DIO has had the opportunity to review the updated noise assessment and this now addresses previous concerns regarding noise. I would therefore have no further comments relating to this application subject to a suitable condition to implement the mitigation measures set out in the submitted noise assessment.

TRANSPORT FOR LONDON (TfL)

TfL understands that the application has been referred to the Mayor of London and transport comments in the Stage 1 report to him will reflect the comments below. The contents of this letter relate solely to transport and do not prejudice any subsequent Mayoral planning decision.

Context

The site is located on and accessed from Harefield Road, which is located to the west of the site. The development site is bound by residential units to the north and industrial units to the east and south. The nearest section of the Transport for London Road Network (TLRN) is the A40 Western Avenue, which is located approximately 1.5 km from the site. The nearest section of the Strategic Road Network (SRN) is the A4020, Oxford Road, which is approximately 200m away.

The site lies approximately 550m from Uxbridge Station which is served by London Underground Piccadilly and Metropolitan Line services. The closest bus stop is located on the High Street which is approximately 180m meters away from the development site, providing access to multiple routes through the west of London, therefore the site records a Public Transport Access Level (PTAL) of 5, on a scale of 1 to 6b where 6b is the most accessible.

Access

The proposal includes retention of the current vehicular access from Harefield Road to the west of the site. In addition to this a the development would upgrade a pedestrian link to the south of the site; this is welcomed and accords with the current London Plan policy 6.10 and draft London Plan policy T2 Healthy Streets. Access for cyclists and links to local cycling routes should also be addressed in the TA.

Car Parking

The development is proposed as a car free development; this is welcomed and strongly encouraged by TfL, as the development site is situated in an area with excellent Public transport access of PTAL 5. As such, a 'permit free' restriction should be imposed by the Council to exempt future residents' eligibility for local parking permit. Eight accessible spaces provided on site are proposed, this fall short of the standards set out in the draft new London Plan policy T6.1 residential car parking, which states that:

Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

- 1) Ensure that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset.
- 2) Demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as designated disabled persons parking in the future. If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future. Therefore this should be clarified. In addition to this

20% of spaces should have electric charging facilities, with passive provision for all remaining spaces in line with the draft new London Plan, policy T6.1.

Cycle Parking

It is welcomed that the applicant has provided cycle parking above the draft London Plan standard. However it is noted that the associated facilities to accompany commercial cycle parking spaces are absent from this application. Therefore the applicant should provide all supporting facilities for long stay cyclist such as lockers, shower and changing facilities. TfL advise where double decker storage racks are provided they should have a mechanically or pneumatically assisted system for accessing the upper level, as many people find using these spaces difficult. The product must also allow for double-locking. Minimum aisle widths, as set out in the London Cycle Design Standards (LCDS) must be met in order for these stands to be usable.

Additionally, please note that the London Plan refers to the need for "easy access" and catering "for cyclists who use adapted cycles". This is an accessibility requirement. The London Cycle Design Standards (LCDS) states that 5% of stands ought to be able to accommodate larger cycles. The easiest way to meet accessibility requirements on types of cycle parking, as well as serve different user needs generally is to provide a mix of types of cycle stands, preferably including the Sheffield style of stands.

Further to this, TfL recommends that the cycle parking for residential units is more evenly distributed across the various buildings, rather than in large cycle stores as currently proposed, to make them more accessible and convenient.

Trip Generation/Network Impact

The current land use generates 42 two-way vehicle trips during the AM peak period and 128 two-way vehicle trips during the typical PM peak. The proposed development would generate 156 AM peak movements and 124 PM peak movements. Of these approximately 109 AM peak two-way movements would be vehicular of which 91 would be made by public transport.

During the PM peak there would be 86 two way vehicular movements, 72 trips will be made by public transport. During the AM peak the proposal is predicted to result in a single arrival and 4 departures, this would result in a decrease of 37 car trips from the site. During the PM peak there are predicted to be 2 car arrivals and a single departure. This would result in a two-way decrease of 124 car movements to the site.

The overall NET change in trip generation would equate to approximately 114 additional AM peak trips, of which 138 trips would be made by active or sustainable modes of transport. During the PM there will be approximately 4 less trips, over all will generate 124 trips, of which 110 trips will be made by active or sustainable modes of transport.

As a result, there will be an increase amount of trips made, however TfL is satisfied that the development will not have any significant impact on the network.

Travel Plan

In line with the London Plan policy 6.2 and the draft London Plan policy T4, it is expected that a site wide residential Travel Plan is produced. This should include measures or incentives to encourage more active modes of travel. This would reduce vehicular trips to and from the site in line with London Plan aspirations for sustainable travel and air quality improvement. The Travel Plan should be secured by appropriate planning obligation/ condition.

Delivery and Servicing Management Plan

A Delivery and Servicing Management Plan (DSP) should be secured by condition as required by policy of T7 of the draft London Plan, and in the London freight plan. In addition to this it should be

noted that these deliveries take place outside of peak times (0800-0900 and 1600-1800) to minimise any impact on the SRN; this should also be secured by condition.

Construction Logistics Plan (CLP)

As the site is close to the TLRN it is particularly important that a Construction Logistics Plan (CLP), as referred to in the London Plan Policy 6.3 and draft London Plan policy T7 is secured by condition.

Mayoral Community Infrastructure Levy

The Mayor has introduced a London wide Community Infrastructure Levy (CIL) which came into effect on 1st April 2012, and it will be paid on the commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Hillingdon is £35 per square metre (gross internal area). The required CIL should be confirmed by the applicant and council once the components of the development have been finalised. More details are available via the GLA website <http://london.gov.uk/>.

In conclusion, based on the information provided in the meeting, the proposal is considered acceptable, subject to the following revisions;

- Provide additional details regarding disabled access
- Provide additional details for commercial cycle parking at the development should also be provided. This should meet at least draft London Plan standards and designed in accordance with the LCDS.
- A detailed CLP, DSP and Travel Plan should be secured via condition or s106

TRANSPORT FOR LONDON (TfL) 2nd comments

Thank you for consulting TfL on the above application. Following the information received on 09/08/2018, TfL have prepared a response.

Please note the following comments represent the views of TfL officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the GLA.

Car Parking

The applicant provides eight (3%) accessible parking spaces for the residential element of the development from the outset and one accessible space has been proposed for the commercial element of the development. This provision is in line with draft London Plan standards. No space has been identified for the additional 7% parking which should be provided should demand arise. However, the applicant has provided a robust justification for this, citing the Accessible London SPG and the site's accessibility, including step free access to/from Uxbridge Station. Because of this justification, TfL is confident that additional demand is unlikely to arise and the level of parking proposed is therefore considered acceptable.

Cycle Parking

The applicant is happy for the design details of the cycle store to be subject to approval by means of a condition. This is acceptable to TfL. The design of the store should be in line with draft London Plan standards and the London Cycle Design Standards.

Travel Plan

The applicant submitted an Interim Residential Travel Plan, this ITP is considered acceptable in principle and the applicant has stated that a Travel Plan Coordinator will be appointed by Five Nine Living. A Full Residential Travel Plan which should include the details of the Travel Plan Coordinator, Year 5 mode share targets in line with the Mayor's Transport Strategy target for London in 2041, and a monitoring programme that includes the surveying of cycle and car parking occupancy at the site

to be submitted within six months first occupation or at 75% occupation, whichever is sooner, should be secured via condition or s106 agreement. From the applicant's response it is understood that the applicant agrees in principle to a post-occupation condition/obligation on the Travel Plan.

It is recommended that monitoring of the car parking occupancy would trigger a requirement for measures such as facilities for the storage and charging of mobility scooters if a certain occupancy is reached, to ensure the development is fully accessible to people with a disability.

Delivery and Servicing Plan and Construction Logistics Plan

Both a Delivery and Servicing Plan and Construction Logistics Plan should be secured via condition, as agreed by the applicant.

ENVIRONMENT AGENCY

Thank you for consulting us on the above application. We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

SPORT ENGLAND

The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306), therefore Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of this application.

HEATHROW SAFEGUARDING

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

THAMES WATER

Thames Water would advise that with regard to surface water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Waters Risk Management Team by telephoning 02035779483 or by emailing www.riskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.

NATURAL ENGLAND

Natural England has no comments to make on this application.

NATURAL ENGLAND 2nd comments

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

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

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

METROPOLITAN POLICE - UXBRIDGE POLICE STATION

On behalf of our client the Metropolitan Police Service (MPS), we write to submit an objection to the above planning application. The application site is directly adjacent to the Uxbridge Police Station, which is fully operational and is one of the main centres for coordination of policing within the London Borough of Hillingdon.

The existing boundary wall dividing the Police Station with the application site is insufficient to address the proposed development which would result in a change in the nature of the use from limited hours retail to a residential 24/7 environment. This would lead to an increase in the potential for intrusions and hostile reconnaissance. The existing boundary brick wall is quite low and as result, the MPS will require the applicant to deliver security enhancements to address the situation. Clearly, the responsibility for managing the sensitive interface between the application site and the Police Station and mitigating the potential overlooking impact lies with the applicant, rather than MPS. The interface with the Police Station is an inherent constraint of the application site and it is considered that this should be appropriately managed.

Case Officer comments:

Representatives of Uxbridge Police Station have discussed the above concern with the developer and an agreement has been reached that the developer would ensure a 2.9m high wall be constructed and maintained along the boundary between the development site and the Police Station. This would be secured by a s106 agreement/condition should the application be approved.

Internal Consultees

WASTE STRATEGY OFFICER

The waste capacities identified for the residential units are suitable. There should be a 50/50 split between waste and recycling containers for each block.

However, there is not a clearly identified waste storage or collection area for commercial unit B. There is no capacity available, nor would it be suitable for the commercial unit to share the refuse store with the residential units. Several of the ground floor properties would be required to walk further than the recommended thirty metres in order to deposit waste in their own block, three of which have been designed as disabled units.

Although it's clear that the intention is for management staff to bring out the residential bins for emptying, there appears to be no consideration for the properties which open onto the proposed collection area.

The access for the refuse vehicle appears very narrow. The application states that a tracking exercise has been undertaken to demonstrate that the vehicle could easily navigate through the development. Please could this be provided showing a clear turning circle and taking into account cars parked in the allocated spaces.

The collection point for the south east refuse store of block B is further than ten metres from the

proposed vehicle path. The collection point should be moved or this included in the tracking exercise.

WASTE STRATEGY OFFICER 2nd comments

There is suitable capacity for residential waste and recycling. As this is not even distributed across the site, the management company will be responsible for rotating bins between bin stores to ensure that there is enough capacity within each store.

Should the business area, gym or lounge be made available to non-residents then adequate waste and recycling facilities must be provided and kept separate from the residential waste.

The vehicle would have to reverse further than 12 metres in order for the crew to collect directly from the bin store housing two bins located within block B. The management company should pull these bins out to one of the designated points for collection.

Block C's bins should be presented for collection on the side of the road opposite to Block C to ensure clear access into Block C's properties.

An adequate provision for waste and recycling storage must be provided for Commercial Unit B, located within Block C. If this is sited externally to the unit, measures should be taken to secure the container(s) which should be stored away from the windows and doors of any dwellings.

If a storage area is located within the unit, the design should be such that the container(s) can be removed directly to the outside without passing through any part of the building except by way of passage. An internal bin storage area should have appropriate passive ventilators to allow air flow and stop the build up of unpleasant odours. The ventilation needs to be fly and vermin proofed and near to either the roof or floor, but away from the windows of any dwellings.

WASTE STRATEGY OFFICER 3rd comments

The swept path analysis hasn't eased our concerns. It further highlights how tight the access is and after speaking with several senior drivers I'm not confident that we'll be able to carry out scheduled collections.

Objection based on BS 5906:2005 clause 10, paragraph 2:

'The layout of roads should be such as to ensure reasonable convenience for the collecting vehicle and the collectors. Roads should have a minimum width of 5m'

I made a comment on the previous application regarding the properties which open onto the proposed collection area which has not been responded to. This is still a concern for Block C's collection point in particular where 24 bins would cover around 34 metres of the pathway and will likely block access to enter / exit the properties. The layout as proposed is not deemed acceptable.

If the application could resolve outstanding objections I would recommend a condition for the collection points that:

'No kerb or step should be present at the collection point. Containers should be presented off of the footpath but not causing obstruction to the collection vehicle or a suitable dropped kerb should be installed for the entire length of the collection point.'

The response regarding the commercial unit is quite vague and I retain my concerns. so I would also like to propose a condition for this.

'An adequate provision for waste and recycling storage must be provided for Commercial Unit B, located within block C. If this is sited externally to the unit, measures should be taken to secure the container(s) which should be stored away from the windows and doors of any dwellings.

If a storage area is located within the unit, the design should be such that the container(s) can be

removed directly to the outside without passing through any part of the building except by way of passage. An internal bin storage area should have appropriate passive ventilators to allow air flow and stop the build up of unpleasant odours. The ventilation needs to be fly and vermin proofed and near to either the roof or floor, but away from the windows of any dwellings.'

My last concern relates to the comment that the residents living in the disabled units of Block C will use the bin storage located internally within Block B.

From a safety aspect I would think that it's inappropriate for non-residents to have internal access to a building.

The building regulations 2015 H6, clause C under the 'Performance' heading does say 'requirements of H6 will be met if the solid waste storage is sited so as to be accessible for use by people in the building'. I would recommend that if a resident is unable to carry their waste to the storage within their own block that the management company provide personnel to assist.

FLOOD AND WATER MANAGEMENT

This is a poor and insufficient drainage design from Tier which is not integrated with other parts of the design of this scheme or the landscaping. Plans must be consistently shown across all disciplines rather than different consultants showing different and conflicting design and illustration.

Surface water

Site is under 1 hectare but is a major development requires a SuDs strategy. Further information and details of requirements can be found on the Council website including confirmation of the requirement to meet greenfield run off rates within all development, Design and Evaluation Guide. For example the drainage design designs for the worst case option of tanks, which is not acceptable. SuDs are a material consideration, ie it must be demonstrated that the scheme is implementing the most sustainable design on the site.

The green roofs and other elements proposed in the landscaping designs should be clearly integrated into the drainage design so that they will be implemented. Blue roofs should also be considered to be integrated within the podiums proposed as well as 'Living Roofs' on the other roof structures.

All hard surfacing must be made permeable across the site. Integrated rain gardens along the main green node should be considered and so further detail of this green space provided.

The Treepits should also be designed to mitigate surface water arising from the development as well as living walls considered to mask such as large building. The cycle stores shown on other plans interrupt the proposed green buffer zone proposed around the building and a larger and uninterrupted green zone should be maintained around the whole buildings, along the length of the Police station boundary not just part.

The proforma submitted implies different results to those contained within the report. However for a site under a hectare the Council would expect a discharge rate of approximately 2/l/s

The proposals appears to be connecting into a manhole on the pavement which is not indicated to be a public sewer, unless it can be provide otherwise should be public and may be highway drainage it is therefore not acceptable. A revised proposal should therefore be considered, showing the exact location of an appropriate connection to a publicly adopted network.

There also appears to be no rainwater harvesting/ water use proposals included which is critical to Hillingdon to reduce demand on water supplies in addition to ensuring the development meets 105 litres per person a day through water efficient fittings.

Green infrastructure

It is supported the use of and inclusion in part of some green infrastructure, across and around the site. However the cycle stores shown on other plans interrupt the proposed green buffer zone proposed around the building. As well as there being insufficient width for any green buffer zone along the eastern boundary on the general arrangement drawings. A zone wide enough for planting and management purposes as well as uninterrupted green zone should be maintained around the whole buildings, and along the length of the Police station boundary not just part.

It is disappointing and unacceptable that the trees softening the entrance and lead into the site and views from the Grade 2 Listed Magistrates Court, where the setting of listed buildings are important are being removed completely. There are also too few trees proposed within the parking area. It is supported the pedestrian access to the south the Avenue being lined with Trees, as well as isolated trees in other parts all of these trees must be integrated into the drainage strategy.

The landscaping must also be linked with the proposals for views shown in the Design and Access statement as 6.5 as the green infrastructure to the east of the police station boundary proposed may block these views. It appears living walls are suggested in the Design and Access statement but not included in the landscaping planning.

A key part for the development is accessibility to the town centre to be used by future residents and the access currently signpost to Beasley Court from the High street is poorly signposted and appears still to be access for cars. The development should clearly consider the enhancement as part of a S106 or 278 agreement with the Council to resurface of this entrance area on the public highway as well as working with the Beasley development to encourage a safer and secure access route.

In addition the current location of tree and green space in the way in Warrick Place of what will be in the way of the desire line of future residents towards the High Street. In addition it is not clear if this is locked at times limiting this developments access to the high street, and therefore the access to the Station etc.

Recommendation

Substantial revisions are required to this proposals as well as evidence provided of how they will manage and mitigate for proposals prior to submission for planning.

FLOOD AND WATER MANAGEMENT 2nd COMMENTS

A revised FRA has been submitted and commentary in response to issues raised by officers has been submitted by the applicant. I have reviewed the commentary made in response to officer comments, and the Flood Risk Assessment Dated August 2018.

Although the proposals do now provide a more acceptable proposal in terms of managing the quantity of run off and reduces this to as close to Greenfield run off rates as possible. It is also critical that this is achieved through the most sustainable drainage methods.

The information contained within the FRA to justify not using more sustainable methods is not considered sufficient to justify not using better options within the SuDs hierarchy. The justification of not considering living roofs as issues have been raised by the MOD is not considered justification. Living roofs have been and are being implemented across Hillingdon in various locations in close proximity to airports subject to mitigation for concerns raised.

- The limited benefit they provide to water quantity is also not considered justification as the need is to choose the most sustainable option and therefore provide other wider benefits.
- The landscaping designs for the site significantly rely on the use of the roof space for the provision of communal space within the proposals. Which also propose to utilise green space for biodiversity.
- The consideration of options also does not include all options such as rain gardens which can be

integrated within landscaping proposals of limited size.

- Even if infiltration is low, the purpose of more sustainable options than below ground tanks is that they provide wider multiple benefits such as water quality and dealing with water at source. It is important that the landscaping principles as well as drainage are aligned and integrated and therefore feasibility of plans is set out clearly at planning stage and not left to conditions.

It is critical at this stage that areas are safeguarded for landscaping and drainage at planning stage in order that the appropriate scheme can be implemented. The site should provide a continuous green buffer around the boundary. Cycle stores and other hard surfacing along with the proximity of buildings to the boundary would negate that principle and the aims of the landscaping aims and concepts for design. To improve Biodiversity in a meaningful way the layout needs to implement continuous green links. It is not just the volume of trees but the location and context of these trees and other vegetation.

Site is under 1 hectare but is a major development requires a SuDs strategy. Further information and details of requirements can be found on the Council website including confirmation of the requirement to meet greenfield run off rates within all development, Design and Evaluation Guide. There has been no revision of the drainage strategy submitted, although it has been acknowledged that the site proposes to connect to a manhole which is not a publicly adopted sewer. There is no evidence provided to suggest that there is an appropriate licence for this or that this was ever approved by the Local Authority and could be considered an illegal connection. It is not considered there is any right to connect to private sewers, although it is acknowledged to reuse appropriate legal connections where possible.

If this arrangement was to be formalised, the Highways Service would not accept new connections to the manhole without an appropriate licence and understanding that the system has the appropriate connections of functions, or the appropriate information ie condition/ CCTV survey was submitted so that it could be offered up to Thames Water for adoption. There is also no information on water reuse and recycling within the site. Minimizing consumption and encouraging rainwater harvesting.

Recommendation - Objection

Reason

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to:

- Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012),
- Policy DME1 10 Water Management, Efficiency and Quality in emerging Hillingdon Local Plan Part 2 Development Management Policies,
- Policy 5.12 Flood Risk Management of the London Plan (March 2016) and
- To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), and
- Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016).
- National Planning Policy Framework (March 2012), and the
- Planning Practice Guidance (March 2014).

FLOOD AND WATER MANAGEMENT 3rd COMMENTS

Previous comments have been provided in September 2018 based on Revision 1.3 of the Flood Risk Assessment (Tier Consulting report dated August 2018) and Revision 001 of the Drainage Strategy (Tier Consulting report dated May 2018). A subsequent version of the Flood Risk Assessment (revision 1.4 dated November 2018) and Drainage Strategy (revision 002 dated November 2018) has been provided.

We welcome that green roofs are now proposed for the development and would expect the detailed design of the green and brown roofs to maximise the attenuation capacity to reduce the requirement for below ground attenuation storage. This alleviates some of the concerns raised from the previous objection response to the surface water management proposals.

There are, however, aspects of the proposed surface water drainage strategy that are not considered to be acceptable at this stage. These were raised in previous objection comments and have not been adequately addressed in the amended Flood Risk Assessment, nor the Drainage Strategy.

1. Surface water discharge rate and location - The Flood Risk Assessment states that the proposed surface water drainage strategy is to discharge into the public sewer at a restricted runoff rate of 5l/s. While we welcome that the rate of runoff will be reduced to 5l/s for the site, which is just greater than the calculated QBAR, it has been acknowledged in correspondence that the existing drainage connection does not discharge to a public sewer and further information has not been provided to suggest that this connection is legal and can be retained for the lifetime of the development. The current information is misleading and does not address the drainage constraints of the site. Additional information is required to demonstrate the continuation of this drainage network to a public sewer, including an indication of the capacity of the network and details of any historic discharge licences/agreements.

2. Blue/green landscaping - there are considerable opportunities within the landscaping strategy for the site that have not been taken in the current drainage strategy. As previously stated, it is critical that areas are safeguarded for landscaping and drainage at the planning stage in order that the appropriate scheme can be implemented. The Flood Risk Assessment discounts the possibility of utilising swales; however, there are multiple linear landscaping features within the development that can be used for conveyance and attenuation. In line with the London Borough of Hillingdon Sustainable Drainage Design and Evaluation Guide, the applicant should consider the proposed landscaping strategy and identify the opportunities for SuDS. The decision to utilise below ground pipes for conveyance at an early stage of design without consulting the landscaping strategy is not adequate justification for omitting blue/green infrastructure.

3. Infiltration drainage - Infiltration drainage is not proposed for the development. As previously raised, even if the rate of infiltration is low, the purpose of more sustainable options than below ground tanks is that they provide wider multiple benefits such as water quality treatment and deal with surface water at source. Permeable paving should be used throughout the development to reduce the requirement for below-ground storage in addition to other partial infiltration measures.

4. Water reuse - further information has not been provided as requested to demonstrate the proposed methods of water reuse and recycling within the site. The proposals should minimise water consumption and encourage rainwater harvesting where this is suitable. This is of particular importance for the water supply to the landscaping areas in the development.

Until these aspects of the drainage design are adequately addressed through the supply of additional information at this design stage, we are unable to recommend that this site be granted permission.

Recommendation: Maintain Objection

Reason

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to:

- Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012);
- Policy DMEI 10 Water Management, Efficiency and Quality in emerging Hillingdon Local Plan Part 2 Development Management Policies;

- Policy 5.12 Flood Risk Management of the London Plan (March 2016);

To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016); Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016); National Planning Policy Framework (March 2012); and the, Planning Practice Guidance (March 2014).

ACCESS OFFICER

In assessing this application, reference has been made to the London Plan 2016, Policy 3.8 (Housing Choice), and Approved Document M to the Building Regulations 2015 (ADM 2015). Reference is also made to the Council's Supplementary Planning Document 'Accessible Hillingdon', adopted September 2017.

The submitted Design & Access Statement provide very limited information. No detail has been provided and how the principles of inclusive design have been applied throughout the design process. The DAS does, however, state that all units would achieve level access, with the wheelchair accessible units each served by two lifts.

1. Contrary to the information stated in the DAS, Block A contains wheelchair accessible units that are served by a single lift only. This arrangement would render those units inaccessible to a wheelchair user during a lift breakdown or during periods of routine maintenance. This arrangement is unacceptable.

2. A floor plan at no less than 1:100 should be submitted for each of the different M4(3) units. All details, to include transfer zones, wheelchair storage area, and other spatial requirements within bedrooms, bathrooms, living and dining areas, should be shown on a separate plan for every different unit type.

3. The internal layout and spatial requirements to achieve compliance with the prescribed standards set out in M4(2) is questionable, particularly within the bathrooms. Similar details and plans should be submitted in respect of the remaining (90%) M4(2) units.

4. It is unclear which of the units would be fitted out for 'day one occupation' by a wheelchair user. These units should be designed and fitted as per the prescribed standards for a Wheelchair Accessible M4(3) unit, as set out in ADM 2015, with the kitchens and bathrooms designed accordingly.

5. The M4(3) units should be interspersed throughout the development, as opposed to in small clusters is currently shown on plan.

6. Details should be provided in respect of the materials palette, and particularly, the paver types intended for use within the public realm. A materials palette should be provided together with a strategy to ensure that the paving would be laid in accordance with the tolerances set out in BS8300:2018.

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

8. No details appear to have been submitted on play equipment that would be accessible to disabled children, including those with a sensory impairment, or complex multiple disabilities. Provisions could include outdoor sound tubes, colour and lighting canopies, and other items that could stimulate the olfactory senses.

Conclusion: further details and revised plans should be requested as a prerequisite to any planning

approval. The planning conditions detailed below should be attached to any grant of planning permission:

Planning conditions

i. The development hereby approved shall ensure that ten percent of the residential units are constructed to meet the standards for Category 3 M4(3) wheelchair user dwelling. 7 Affordable Housing units shall be constructed to a Wheelchair Accessible standard, with 19 wheelchair user private for sale dwellings, constructed to a Wheelchair Adaptable standard, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.

Reason:

To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 d, is achieved and maintained.

ii. Ninety percent of the dwellings hereby approved shall be constructed to meet the standards for a Category 2 M4(2) Accessible and Adaptable dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.

Reason:

To ensure an appropriate standard of housing stock in accordance with London Plan policy 3.8 c, is achieved and maintained.

iii. Prior to the occupation of the dwellings hereby approved, evidence of compliance with the prescribed standards for M4(2) and M4(3) dwellings as set out in Approved Document M to the Building Regulations (2010), 2015, issued by Building Control or an equivalent representative body, shall be submitted to the Local Planning Authority.

Reason:

To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 (c) and (d), is achieved and maintained.

Case Officer comments:

The applicant responded to the Access Officer's comments on 17th August 2018. Following a review of this response the Access Officer provided further comments confirming that they have no further comments to make.

CONSERVATION OFFICER

The site currently has two retail warehouses set at the back of the plot surrounded by a parking area running down to the Harefield Road. Although not within a designated area, the site is in a sensitive position surrounded by heritage assets. To the south is the north western section of the Old Uxbridge/Windsor Street Conservation Area which is focussed on the High Street. The north side closest to the site has a run of grade II listed buildings, numbers 118-123. Opposite on the south side are the grade II listed The Cedars and Old Bank House. An alley leads off to the north to Beasleys Yard where there is the Grade II listed Watts Hall. There is a further run of listed buildings commencing on the other side of the alley, numbers 126-135 High Street and these are terminated by the grade II listed The Crown and Sceptre Public House (now Whelans). Opposite the site on Harefield Road is the locally listed Uxbridge Magistrates Court and to the north east the North Uxbridge Area of Special Local Character.

These are the most pertinent designated and undesignated heritage assets to consider in relation to this proposal to redevelop the site. The proposal is for 264 build to rent apartments with ground floor

commercial space. These will be spread across three main building blocks with a lower block parallel to Lancaster Road (Block B), a block that creates a street frontage on the Harefield Road with an eight storey tower behind (Block A) and the largest block of eight storeys and a twelve storey tower behind the High Street (Block C). The application is accompanied by a Townscape, Visual and Heritage Statement by KM Heritage.

Comments: This application needs to be assessed in terms of its impact on the setting of the listed buildings, conservation area, locally listed magistrates court and North Uxbridge ASLC.

Listed buildings and conservation area

KM Heritage has carefully selected 22 views to assess the impact of the proposal on the surrounding area which support their argument that the impact on the setting of the surrounding area is low and offset by the high quality design and public benefit.

I would take issue with View 1 & 2 which have most likely been chosen to support KM Heritage's carefully crafted argument that there is minimal harm. Standing between these two viewpoints at the bottom of the disabled access ramp outside the Atrium office block it is clear that the twelve storey tower would line up and loom over the elegant eighteenth century number 118 High Street. The impact of Block C, as the tallest block is known, is increased by the existing gap between the police station and the office block next to the grade II listed Watts Hall and the tiny number 119 High Street (Nonna Rosa Restaurant) which creates a sky gap between numbers 118 and 120 High Street. Given the lie of the land rising from south west to north east and the gaps in the built environment it seems inevitable that the scale of the proposed scheme will ensure it is visible both in shorter views at the north west end of the High Street and longer views to the south west on Harefield Road around the Atrium office block. The proposed tower would be visible rising above the listed building in views from this area and would not preserve or enhance the setting of these listed buildings and by association the conservation area.

The tower and eight storey block would infill between views of the police station and the grade II listed building as shown in View 2 and would have a negative impact. It is not simply the scale of the tower that is an issue but that of the eight storey block as well.

It does not appear to be logical to have the tallest block in the southern corner of the plot closest to the heritage assets with the greatest value, ie the designated heritage assets. The diminutive scale of the buildings along the High Street seem to have been entirely overlooked in the development of the design. KM Heritage states that the height of this block is in response to the "larger built form of the town centre" but this is to ignore the immediate character of the conservation area and listed buildings which are far closer to the site.

Further to the south east along the High Street and conservation area the buildings are particularly low next to the Crown and Sceptre Pub (now Whelans), there are two unlisted single storey buildings but still within the conservation area. KM Heritage's view 4 shows these buildings but suggests that the tower will only marginally project above them. I would suggest that this depends entirely on your location and that a single storey building in this location is more than likely to allow for views of a twelve storey building behind.

I do not accept KM Heritage's argument that this large development on higher ground with a twelve storey tower block and a substantially sized eight storey apartment block will barely be visible in association with the listed buildings and conservation area. The scale will impact negatively on the setting of these designated heritage assets and will appear intrusive and alien within the context of the historic street. Blocks A will not have the same degree of impact due to its location further to the north and Block B will be screened by the oversized Block C.

Uxbridge Magistrates Court (Locally Listed)

The block opposite will be four storeys which will still look out of scale with the single storey with an attic Magistrates court and two storey suburban houses further along Harefield Road. The scale of the proposal will overwhelm the locally listed building and dilute its historic significance as an important public building. This will only be exacerbated by the eight storey block behind and the twelve storey tower and eight storey block further behind shown graphically illustrated on plan (20)-205

North Uxbridge ASLC

The ASLC only comes close to the south east corner of the site so that the direct impact on this is lower than the other heritage assets but the development rising from four to eight and then twelve storeys will inevitably be seen in the small scale streets and will be an unwelcome addition to the sky line. Even the smaller block parallel to Lancaster Road is still four storeys high backing onto the two storey suburban houses, the south east end of Lancaster Road is included in the ASLC. The proposal would neither enhance nor preserve the ASLC.

Conclusion

There is no in principal objection to the demolition of the buildings on the site or the redevelopment of the site with regards to the surrounding heritage assets. However the proposal incorporates one twelve storey tower with an eight storey block of flats located behind the north west end of the High Street and a further eight storey tower set closer to the Harefield Road with a four storey block along the Harefield Road.

Magistrate's court and a four storey block parallel to Lancaster Road. The scale of what is proposed and the impact on the surrounding heritage assets is wholly unacceptable and should be resisted. The towers should be omitted and the overall height of the development should be significantly lower so that its impact is neutral, first and foremost, on the setting of the listed buildings and conservation area and then to a lesser but still important degree on the setting of the locally listed building and the ASLC.

Recommendation: Refuse on the grounds that the proposal would not preserve the setting of the listed buildings (Planning (Listed Buildings and Conservation Areas) Act 1990, 66 (1). Nor would the development within the setting of the conservation area, locally listed building or ASLC enhance or better reveal their significance (NPPF 2018, 200). There does not appear to be a clear and convincing justification for the harm to the setting of the designated heritage assets (NPPF 2018, 194). The proposal would indirectly affect the non-designated assets of the locally listed building and ASLC and on balance the negative impact of the proposal engendered by its overwhelming scale would not be acceptable given the significance of these heritage assets (NPPF 2018, 197). Finally, the proposal would be contrary to the Hillingdon Local Plan that seeks to preserve and enhance the borough's heritage assets and their setting (SO1 and HE1).

Case Officer's comments:

The Conservation officer's comments were provided to the applicant on and a response was provided. This response was forwarded to the Conservation Officer for consideration.

CONSERVATION OFFICER 2nd comments

I have read submitted letter with interest regarding my conservation comments with respect to the proposed development of land adjacent to the Harefield Road.

Having read his comments, my view remains unaltered, that the overwhelming scale of the proposal would be detrimental to the setting of the surrounding heritage assets.

ENVIRONMENTAL PROTECTION UNIT

I have read through the submitted information documentation and associated acoustic information.

There is a potential for noise and vibration issues during the construction phase of the development and also for possible noise issues for the future end users of the development. The design principles seem reasonable and practical and issues around noise and vibration can be covered by way of condition.

In light of this I do not wish to object to the application but suggest the following should you be mindful to grant the application.

Before the development hereby approved commences, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority. The CEMP shall comprise such combination of measures for controlling the effects of demolition, construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including the phasing of the works, hours of work, noise and vibration, air quality, waste management, site remediation, plant and equipment, site transportation and traffic management including routing, signage, permitted hours for construction traffic and construction materials deliveries. It will ensure appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. All demolition, construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA.

Reason:

To safeguard the amenity of surrounding areas in accordance with policy OE5 of the Hillingdon Unitary Development Plan.

The noise level in rooms at the development hereby approved shall meet the noise standard specified in Table 4. BS8233:2014 for internal rooms and external amenity areas.

Reason:

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by (road traffic) (air traffic) (other) noise in accordance with policy OE5 of the Hillingdon Unitary Development Plan.

Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ [and $L_{nT,w}$] of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings, namely [eg. living room and kitchen above bedroom of separate dwelling]. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason:

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by (road traffic) (air traffic) (other) noise in accordance with policy OE5 of the Hillingdon Unitary Development Plan.

There is commercial floor space proposed but uses have not been specified as yet at this stage but it is important to protect residents from noise from commercial premises so I suggest the following:

Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ ceiling/ walls separating the commercial part(s) of the premises from noise sensitive premises. Details shall demonstrate that the sound insulation value $D_{nT,w}$ [and $L_{nT,w}$] is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise

within the commercial premises and to achieve the 'Good' criteria of BS8233:2014 within the dwellings/ noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason:

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by (road traffic) (rail traffic) (air traffic) (other) noise in accordance with policy OE5 of the Hillingdon Unitary Development Plan.

The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

ENVIRONMENTAL PROTECTION UNIT 2nd comments

In relation to the EP comments I can clarify the following:

DnT,w + Ctr has to be 5dB above the Building Regulations. The building Regs are minimum standards and the condition increases by 5dB to further improve SI and prevent possible complaints of sound transference.

As noise from commercial uses is of concern where there may be a link between commercial and a noise sensitive premises then we are requiring DnT,w + Ctr to be 10dB above building regs.

As there are no commercial units above noise sensitive premises this part of the condition will not be required.

URBAN DESIGN OFFICER

Context

The existing site is comprised of low-lying large footprint retail units that are circa three-storeys (equivalent) in height, with a large open front court area for car parking, access, servicing and landscape. The existing buildings cover circa two-thirds of the site area and are significantly set back from the western boundary. There is mature landscape along the northern and western boundaries that help to integrate the site with the surrounding suburban context and soften the impact (screening) for the residential houses that abut the site.

The site itself is located on the north-western edge of the town centre boundary. Therefore, an appropriate transition of scale from suburban to urban will be critical to the success of the development. And to address the many heritage assets that surround the site - particularly the High Street and Harefield Road. Also, appropriate setbacks from the boundary to reduce the development impact on neighbouring properties and to maintain the mature landscape that bounds the site is essential. Any development proposals will also need to respond to the topographical conditions of the site, as it is located on an incline that broadly rises from the south to the north. Therefore, any development that is proposed to exceed the prevailing context height level of one to three-storeys, will start to significantly impact the townscape character and setting, as the site is above the High Street and town centre to the south, and below the residential houses and prevailing suburban morphology to the north, east and west.

Height/ Scale/ Massing

The proposed development is eight and twelve-storeys, with four-storey buildings at the lower levels. The site resides within a predominantly suburban setting, with a majority of the buildings two-storey houses and some three to four-storey retail, office and civic buildings, further south and eastwards.

In addition to the prevailing suburban morphology of the area, the development is adjacent to a Conservation Area to the south (Old Uxbridge/ Windsor Street) and Area of Special Local Character

(North Uxbridge) to the north. The site is also flanked by Grade II and Locally Listed buildings on Harefield Road and the High Street, which is an important western gateway to the town centre. Therefore, the immediate character and setting concerns are further reinforced by the historic context harm that is clearly not considered as part of the proposed design strategy for the site.

The proposed development is a complete juxtaposition to the local suburban area and edge of town centre condition, due to the jump in scale from two to twelve-storeys. There is no attempt to offer a transition in scale or bridge the extreme height/ scale/ massing difference from the proposed development to the immediate area. Four-storeys is proposed against Harefield Road, which in part could work with the buildings on the immediate opposite side of Harefield Rd, but is still higher than the surrounding buildings, which are circa two-and-a-half-storeys and abut the site along the northern boundaries (north, north-east and north-west). The proposed four-storey 'wall' of development against the northern and western boundary is unrelenting and should be broken down to provide a relief and more positive aspect for the existing houses to the north, east and west that abut the boundary. However, the opposite approach has been taken, as the proposed four-storeys immediately jumps straight to eight and twelve-storeys respectively, directly behind the lower build areas. The abrupt change in scale at a short distance does little to soften the transition in height and is considered inappropriate for this location, due to the severity of the proposed change that will impact the streetscene and townscape setting. A form of development (design) that is more imaginatively broken down and more responsive to the immediate environment is required.

The DAS, heritage analysis and TVIA all fail to pick up on the character and setting of the listed buildings and wider conservation areas - especially the cluster of Grade II buildings on the High Street that will be completely consumed by the proposed development. The TVIA has failed to identify adequate viewpoints that are currently clearly skewed to mask the true impact of eight and twelve-storey buildings. The tower will disproportionately extrude from the Grade II listed buildings and large flanking blocks will in-fill the 'skygap' between the Grade II listed buildings. This extreme approach to height/scale/massing in such a sensitive area will create significant harm and thus fundamentally change the character and setting of those buildings that comprise a salient gateway to the town centre, and the conservation areas.

Regarding the wider context, the proposed development is a series of very tall buildings for the area. There are only a handful of buildings that are considered 'tall' in Uxbridge. The maximum height to date has been circa twelve-storeys, but this is for a central and well connected location in the town centre. These instances are contained within a cluster of other tall buildings on a very large development site that is typical of the era it was constructed (late '70s) in the central town centre area - opposite the train and bus station interchange - and part of wider large-scale mixed use development that is not isolated or introverted. It is also worth noting that the taller elements in this development are more slender, with meaningful breaks in the building line and generous separation distances between the taller blocks. This application does not embody any of these design principles nor benefits from this central location, therefore does not justify such a large and unrelenting height/scale/massing for its edge of town centre location.

Recently consented schemes closer to the site have been up to eight-storeys. The existing taller buildings closer to the site are up to seven-storeys. And start to rise in scale towards the town centre core, but still interspersed with low-rise development. It is also important to note that the other taller buildings and more intensive development sites reside within the lower topographical areas, which has helped to reduce their impact. Therefore, the proposed eight-storey 'wall' of development and twelve-storey 'tower', is further compounded by the site's topography that will see the buildings extrude from a strong topographical location that will amplify the impact of these tall buildings. The impact will further accumulate with little or no breakdown in the sheer height/scale/massing of the proposed buildings. For these reasons the proposed development is clearly inappropriate for its location. And excessive within the site itself, as it will create an oppressive environment for the residents. There has been little or no townscape analysis to establish the wider town centre and

hinterland context as a justification for extending the tall building typology beyond the town centre core. The development will clearly be seen from areas far wider than just the Harefield Road, High Street and town centre areas alone, which again has failed to be demonstrated in the TVIA

Layout

The scale of the development will be a significant change to the area and therefore a more comprehensive (strategic) approach to understand its role and function in the wider area is required. This will also help to unlock and enable the adjoining land parcels that would be beneficial to the wider area. If the applicant believes the scheme is capable of accommodating such a high density level of development, then they should also recognise the need to provide a suite of supporting uses and activities for the occupants. And create added benefit for the local community by contributing to the overall growth of the town centre in more ways than just housing. However, there is little or no ground floor activity on a current large retail site. So the conditions have considerably changed to a loss of major active uses in a town centre location, rather than a public benefit, as a result of such a proposed transformational change to an area that is completely the opposite in terms of scale and intensity of use. Mixed-use activity is key to the life-cycle of a development that will foster placemaking and generate footfall to support and sustain the vitality of the town centre. A strategic approach to development would demonstrate this and how the site should create additional retail and/or community benefits that would be enabled/ generated (subsidised/ increased demand) by a very large quantum of residential development. Instead there is a small token gesture of non-residential floor space and the rest of the site is an insular 'gated' residential development. This is not an acceptable development solution considering the site's location, former land use function and proposed quantum of development.

The footprint of the proposed development is considered excessive for the site, as it now covers circa three-quarters of the site area. There is little or no consideration given to the impact on the surrounding land parcels, as the development will clearly restrict any future potential development opportunities, for example, the adjoining Police Station site to the south and the land along the eastern boundary. The proposed building line is effectively hard up against the boundary circa 1m to 2m away in number of key areas adjoining existing residential dwellings and opportunity sites. The excessively large scale of the buildings further reinforces this uncomfortable and imposing relationship, between the proposed and existing development.

Within the development itself, there is little or no amenity space, permeable ground or landscaping + landscape features at grade to serve the residential development or soften the sheer mass and scale of the development within the site or for the wider area (streetscene). In fact there will be a loss of trees, which is a concern as the site is located in an Air Quality Focus Area. The reports submitted with the application also clearly downgrade the value of the mature trees, especially along the northern boundary, which is not a fair representation of their condition. Moreover, it is also clear that the structures that impede these spaces and the embankment, will lead to the loss of further mature trees and vegetation than the plans show. This is not acceptable without adequate mitigation measures and interventions, for example, an increase in the provision of street level trees and permeable space (above the existing quantum), to justify the inevitable loss. This has not been proposed, therefore not acceptable.

The street-level external space comprises of service roads, car parking and two small play areas. The size and configuration of the ground floor space has been generated by the separation (privacy) distances between the buildings, but there are still concerns regarding the separation distances between most of the blocks and within the blocks themselves. The spaces have clearly not been designed as part of the scheme from inception. In effect, they are residual spaces left over after the planning of the building footprints and basic highways requirements to service the site. The result is a very compressed site with lack of external high quality space, with the close proximity of buildings creating a very uncomfortable and oppressive environment, especially considering the height/ scale/ massing of the buildings that are extruded from the excessively large footprints, will amplify this poor

condition further. For this reason, the low level of external amenity space is considered inadequate, not only in terms of function and location, but also in terms of size to serve 264 homes, on a site that is less than one-hectare in size.

The proposed two small play areas are flanked either side by residential dwellings that are only a few meters away. This will constrain their operation with regards to noise and practical hours of usage. The close proximity also raises concerns regarding privacy/ overlooking from the residential habitable rooms to the play areas. And the close proximity of service vehicles that use the adjoining shared surface as the primary access and turnaround space raises further concerns regarding safety and suitable environment. The spaces themselves are very narrow and small. These issues combined highlight the unsuitability of the proposed locations and therefore will compromise their long-term ability to function effectively as play areas or sustain adequate usage (patronage).

The development should be setback further away from the northern boundaries (north, north-east and north-west). This will reduce the impact on the existing residential dwellings that back onto the site and adjoin it along Harefield Road - especially at the proposed height, scale and unbroken mass (wall of development). The setback will enable meaningful (usable) sized amenity space, i.e. 'back gardens', to serve the ground floor units. A majority of the amenity space is provided at roof terrace levels, with a minority of the space at podium level that is very small in proportion to the number of dwellings they are supposed to serve. The layout and location creates a range of overlooking/ privacy, noise and accessibility issues for those elevated spaces, which will constrain their operation and restrict usage due to the small size. The size of these spaces will be further eroded through the defensible space required to protect the units that front the podiums and rooftop areas. Podiums are an acceptable solution if they are circa 1 storey above ground level and the size reflects the quantum of development, which is not the case with this proposed development. Roof terrace spaces (mid to high level) will effectively create an additional storey, since there is no setback from the edge, creating active edges that will further compound the proposed height of the development and overlooking concerns to neighbouring existing dwellings, and within the development itself.

There are general overlooking/ privacy issues for the residential uses. For example, the separation distance for Block B to Block A and B (the 'mews') is typically 12m. Within Block A is 7.5m to 14m. Between Block A and B is 19.5m. And within Block C is 20m. These are all well below policy standards for their varying conditions and is extensive across the site. This will create a very poor quality residential environment - especially at the given scale. It also again indicates the footprint and layout of the buildings is excessive for the site.

A portion of the dwellings and a majority of the habitable rooms are single aspect in these. This is unacceptable and again indicates the proposed layout is inappropriate for this site, because there is inadequate space/ distance between the buildings that will impact on the outlook from the proposed dwellings. The issue is further compounded by the overall (collective) height of the proposed buildings that will create a 'canyon' like (poor quality) effect for the ground level area and the dwellings that enclose/ front these spaces. This will also impact the larger duplex units, which are at the bottom of eight to twelve-storey blocks and therefore not deemed as a suitable environment for families without adequate setbacks and separation between the buildings. This is further compounded by the single aspect nature of the duplex dwellings that should have a secondary aspect, preferable onto a podium deck, to provide a 'back garden' type space that is more suitable for children, rather than a small strip of 'front garden' that is located against the service road, which is too small and inappropriately located for family dwellings.

The service road appears to be very tight for refuse vehicles. It may 'technically' work, but large vehicles operating in this space will be overbearing due to the close proximity to dwellings. It will also effectively make what little public realm there is in location unusable or potentially unsafe during the hours of operation - especially if there are designated play spaces in close proximity to the shared surface area at either end of the service road.

The principle of a gated development is unacceptable and unnecessary in this location. If the ground floor areas are active and the street(s) is well overlooked, then residents should take ownership/ stewardship of the space and therefore the development will be 'self-policing' to discourage anti-social behaviour and crime. Also, a scheme of any scale, with an active range of uses, should generate sufficient footfall to make the place feel welcoming and safe. The site is currently a retail park, but this level/ quantum of non-residential active has not been replaced. The act of gating a develop will in effect turn its back on the surrounding area and therefore will encourage poor integration with the surrounding neighbourhood and conflicts with the principle of place-making and good urban design.

Summary

The proposed development presents a number of issues and concerns with regards to layout, setbacks, height/ scale/ massing, and impact on the historic and suburban context. There is also little groundfloor non-residential activity or adequate usable amenity space across the development. The unit mix unbalanced and biased towards smaller sized dwellings. And the development is gated. It is appreciated that the applicant wishes to make best use (intensification) of the site. However, it is clear there is too much development on the site and the scheme is failing to meet basic policy requirements or suitably address the context and setting of the site. For this reason it is considered very incongruent with the surrounding area and makes little attempt to address the edge conditions of the immediate site and local area. It is worth noting that there has been a distinct policy shift from 'intensification' to 'optimisation', to mitigate the inevitable 'urban cramming' approach that this proposal is a typical example of. Development proposals should also seek to balance the quantity of development with quality of development. Or risk repeating past housing estate mistakes, which unfortunately this development bears all the hallmarks of.

Planning policies and best practice principles state that good urban design should be encouraged and it is an important part of the development process - urban design should not be confused with 'big' architecture. Poor designs that are out of scale and/or character with their surroundings are generally not acceptable. The careful design of new buildings, and the spaces between buildings, respecting the historic and architectural character of the area and features of particular interest, can enhance towns centres and the hinterland areas, to maintain local distinctiveness. The proposed development fails to meet any of these objectives.

It is also worth considering that the NPPF clearly outlines the importance of good (appropriate) design. It specifically references the prevailing character and setting of an area with regards to development impact on the existing context. And high quality buildings and spaces should be sympathetic to the local area, which is fundamental to creating sustainable development/ positive growth where people want to live and work. It is appreciated that innovation can occur if it can optimise land for a range of uses in appropriate locations. And that it raised the standard of design in the given area, so long as it sits in with the overall form and layout of their surroundings. Unfortunately, the scale and impact of the proposed development is too much for the proposed site and it will also severely impact on the character, setting, and the historic assets in the local area. Therefore, the proposed balance of development is clearly in favour of quantity and not quality, which is unacceptable. For the accumulation of all these reason the scheme is not acceptable on Design and Conservation grounds. Objection.

URBAN DESIGN OFFICER 2nd comments

The proposed amendments are not considered adequate or significant to address the many concerns/ objections that have been previously raised with the scheme through the pre-app service and subsequent planning applicant. The scheme is considered wholly inappropriate for the location and the quality of the design and layout is still considered poor and breeches the relevant planning polices for residential development in the Borough. For these reasons and the reasons set out in the application response (design and conservation), objections to the scheme remain unchanged.

POLICY TEAM

Development Plan

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

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

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Saved UDP Policies (2012)

The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2018) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Local Plan: Part 2

The Local Plan Part 2 Draft Proposed Submission Version (2015) was submitted to the Secretary of State on 18 May 2018. This comprises a Development Management Policies document, a Site Allocations and Designations document and associated policies maps. This will replace the current Local Plan: Part 2 - Saved UDP Policies (2012) once adopted.

The document was submitted alongside Statements of Proposed Main and Minor Modifications (SOPMs) which outline the proposed changes to submission version (2015) that are being considered as part of the examination process.

Submission to the Secretary of State on 18th May 2018 represented the start of the Examination in Public (EiP). The public examination hearings concluded on the 9 August 2018 and the Inspector is currently assessing the findings of these hearings. The EiP will conclude when a final Inspector's Report is published.

Paragraph 48 of the NPPF (2018) outlines that local planning authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

On the basis that the Council is awaiting the final Inspector's Report on the emerging Local Plan: Part 2, the document is considered to be in the latter stages of the preparation process. The degree to which weight is attached to each policy is therefore based on the extent to which there is an unresolved objection being determined through the public examination process and the degree of consistency to the relevant policies in the NPPF (2018).

Draft London Plan

The draft London Plan (2017) was submitted to the Secretary of State on 16 July 2018. This will replace the current London Plan (2016) once adopted.

On 13 August 2018, the Mayor published a version of the draft London Plan that includes his minor suggested changes. The examination hearings are due to commence at the start of 2019 and are

not scheduled to conclude until May 2019, with an Inspector's report expected towards the end of 2019.

Whilst it is not possible to determine the specific extent of unresolved objections to the draft London Plan, there are currently close to 2,000 representors who commented on the draft London Plan (2017) according to the London Plan examination website, many of whom submitted responses on multiple issues. This response level, as well as the five months of hearing sessions that are scheduled to take place, indicate that there is still a lot of debate to be had on these policies and questions about their soundness.

In light of this, my first comment on this planning application would be that there is a clear over reliance on draft London Plan Policies, particularly when reading the Planning Statement. Draft London Plan policies should only be given significant weight where they are consistent with the NPPF (2018).

However, reference to a draft London Plan Policy does not necessarily make the point being made invalid and there may be instances where the same point could have been made under an adopted Development Plan policy.

Designations

The site is within an Archaeological Priority Area and near to both the Old Uxbridge/Windsor Street Conservation Area and the North Uxbridge Area of Special Local Character. Comments relating to these designations and the listed buildings in the area are to be raised by other internal consultees.

In the adopted Local Plan: Part 2 - Saved UDP Policies (2012), the site is within the designated Uxbridge Town Centre boundary, but outside of the Primary and Secondary shopping frontages. This remains the case in the emerging Local Plan: Part 2 - Site Allocations (2015).

In the emerging Local Plan: Part 2 - Site Allocations (2015) the site is also within the proposed Uxbridge Hotel and Office Growth location. This however is not relevant to the current scheme as proposed.

Principle of Development for Residential-Led Mixed Use

The site currently consists of two large A1 retail warehouses that are occupied by Wickes and Halfords. According to the planning statement, the units represent a combined floorspace of 3,150m² with a significant level of associated car parking for customers.

As noted above, this retail space is outside of the Primary and Secondary shopping frontages and as such, the relevant policies concerning retention of A1 use in such areas do not apply in this instance.

Nevertheless, A1 retail remains an appropriate edge of centre use in line with Annex 2 of the NPPF (2018) and the two large A1 retail warehouses are also important in strengthening the status of Uxbridge Town Centre in line with Policy E4 of the Local Plan: Part 1 - Strategic Policies (2012). The two large units provide comparison goods, as well as specific services, which are unique to Uxbridge Town Centre and offer diversity from what currently exists on the high street. Support for comparison goods retailing in Major Town Centres, like Uxbridge, is outlined in Part B of Policy 4.8 of the London Plan (2016). As such, the public benefit and loss in value to Uxbridge Town Centre resulting from the demolition of these two units should not be understated.

The scheme, if deemed acceptable in design terms, would provide 264 self-contained units in Uxbridge Town Centre through the redevelopment of brownfield land. This approach to meeting housing demand through the efficient use of brownfield land is supported in Paragraph 118 of the NPPF (2018), Policy 3.3 of the London Plan (2016) and Policy H1 of the Local Plan: Part 1 -

Strategic Policies (2012). As such, the contribution of these new units would assist in meeting the Council's annual housing target of a minimum of 559 units, thus providing a degree of public benefit through the delivery of new homes in a sustainable location.

Policy H1 of the Local Plan: Part 1 - Strategic Policies (2012) also notes the potential for high quality mixed use developments to meet housing demand, which is also reflected in Policy 3.3 of the London Plan (2016). Policy E4 of the Local Plan: Part 1 - Strategic Policies (2012) also notes that mixed-use development in Uxbridge Town Centre is one of many suitable uses, which notably also includes retail.

However, it is important to note that the Council has a consistent history of meeting and exceeding its housing target, as evidenced in the Council's Five Year Supply of Deliverable Housing Sites which was published in December 2017. This document also demonstrates that there is a significant supply of sustainable sites for housing in the pipeline and thus a five year land supply is comfortably demonstrated. Whilst not a reason to refuse a sustainable housing scheme, it should have weight in the degree of public benefit the decision-maker awards to new homes.

When delivered to a high-quality, mixed use schemes in sustainable locations have the potential to achieve multiple public benefits and its value to Outer London is most noted in Policy 2.7 of the London Plan (2016).

Alongside the residential element of the scheme, the applicant is proposing 332m² of flexible commercial/retail floorspace across two separate units. No upfront tenants have been identified in the evidence provided to the Council and as such it is taken that they will be advertised to the market post-completion. Not only are the units substantially smaller than the existing retail units (-2,818m²), they are smaller than those proposed under the pre-application (372m²).

The viability of these units would not benefit from any on-site car parking and there is little evidence to suggest they would attract significant footfall in their own right, particularly when compared to the scale of the units that preceded them. Ultimately they would rely largely on the additional footfall from the new residential units being created. For further concerns relating to the viability of the non-residential aspect of the scheme, I would defer to and endorse the previously submitted Urban Design Comments relating to layout. Ultimately however the units would not conform to Part A of emerging Policy DMTC 1 of the Local Plan: Part 2 - Development Management Policies.

It is also important to note that within the scheme is a private lounge, function room and gym, which according to 3.2.7 of the planning statement will be accessible to residents only. As such these are isolated uses within a gated community that provide no wider public benefit to the area.

At 12-storeys, the scheme would be defined as a tall building. London Plan (2016) Policy 7.7 notes that tall buildings should 'have ground floor activities that provide a positive relationship to the surrounding streets' and 'make a significant contribution to local regeneration'. Emerging Policy DMHB 10 of the Local Plan: Part 2 - Development Management Policies (2015) also states that they should 'be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities'. For the reasons stated in Paragraph 5.9, it is not considered that the non-residential aspect of this scheme achieves either of these objectives.

As such, the non-residential element of the scheme represents a tokenistic attempt at creating a mixed-use scheme which would likely add nominal public benefit to Uxbridge Town Centre. This attempt at a mixed-use scheme does not represent the 'high quality' aspect of high quality mixed use development supported in Local Plan: Part 1 - Strategic Policies - Policy H1.

To conclude, whilst the principle of a high-quality mixed use scheme on the site could be supported for the reasons outlined in Paragraph 5.4 and 5.7, at present the scheme is not of a sufficiently high

quality to warrant support from a policy perspective. The overall public benefit of the scheme should be determined by the decision-maker in light of the disadvantages and benefits that are raised here, but also by other consultees, so that the scheme is considered as a whole.

Purpose-Built Build to Rent

Purpose-built build to rent is a distinct asset class within the private rented sector that is becoming increasingly common across London and is now specifically identified in Annex 2 of the NPPF (2018).

Policy 3.8 of the London Plan (2016) specifically references that when determining applications, the planning system should provide positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery. The Mayor's Affordable Housing and Viability SPG (2017) also provides support for and specific guidance on build to rent developments, recognising that they differ to the traditional build for sale model. Certain requirements, including those surrounding covenants, clawbacks, management and tenancy length, would need to be integrated into any potential S106 agreement.

At a local level, the latest evidence of housing need comes from the Strategic Housing Market Assessment (2016) which notes an increasing proportion of the Borough relying on private rent as their current tenure.

It is important to note however that, whilst they differ to the traditional build for sale model, new purpose-built build to rent is still required to meet adopted local plan policies and needs to be held to the same design standards as schemes of traditional models. There will however be diversion from the local plan in regards to the affordable housing tenure, as outlined in Paragraph 7.2 of these comments, which must recognise the need for all homes to stay under single management.

Residential Mix

Policies H4 and H5 of the Local Plan: Part 2 - Saved UDP Policies (2012) relate to the mix of housing to be provided on new schemes. Policy H4 notes that within town centres, predominantly one and two bedroom developments will be preferable. Policy H5 however also notes that the council will encourage new homes for large families where required, including through the provision of larger dwellings by the private sector in new development.

The latest evidence of local housing need comes from the Strategic Housing Market Assessment (2016) which indicates a substantial borough-wide requirement for larger private market units, particularly 3 bedroom properties. In regards to affordable housing specifically, the need is for 2 and 3 bedroom properties.

Paragraph 7.4.9 and 7.4.10 of the Mayor's Housing SPG note that purpose built private rented schemes are typically targeted at smaller households and local authorities can consider applying local policies on unit size mix flexibly in town centre and edge of centre sites. Paragraph 4.31 of the Mayor's Affordable Housing SPG also notes a similar point, highlighting that build to rent schemes should reflect demand for new rental stock, which is typically greater for one and two beds than in owner-occupied or social/ affordable rented sector.

However in light of the Council's latest evidence of substantial requirement for larger private market and affordable units, as well as the high proportion of schemes coming forward in or on the edge of town centres, limited flexibility can be afforded towards the mix on build to rent schemes.

The proposed mix across the development as a whole is 10.6% studios, 39.4% one-bedroom units, 45.1% two-bedroom units and 4.9% three-bedroom units according to the submitted planning statement. This is an improvement on the original pre-application scheme in terms of a significant increase in 2-bedroom units at the expense of one-bedroom units, albeit there is a smaller decline in

three-bedroom units as well.

The focus on one and two bedroom units, with 50% of the scheme overall consisting of two and three bedroom units, is deemed to be consistent with Policy H4 of the current Local Plan: Part 2 - Saved UDP Policies (2012). In light of evidence outlined in paragraph 7.2 however, the affordable element of the scheme should be secured predominantly on the two and three bedroom units.

Affordable Housing

Policy H2 of the Local Plan: Part 1 - Strategic Policies (2012) seeks to deliver 35% of all new homes as affordable. Whilst the Council would usually seek to secure part of this as affordable ownership, Paragraph 64 of the NPPF (2018) outlines that build to rent should be exempt from this requirement.

The Mayor's Affordable Housing and Viability SPG provides the relevant guidance regarding securing affordable housing on build to rent schemes, including how to implement a threshold approach to viability. Schemes that provide 35% affordable housing on site, without public subsidy, and meet the specified tenure mix are not required to submit viability information or be subject to a late stage review. However, the tenure mix requirement does not apply to Built Build to Rent schemes and the SPG states that this should be entirely discount market rent.

Where this 35% threshold is not achieved, the applicant must submit a financial viability assessment demonstrating why it is not viable to meet the policy requirements.

POLICY TEAM 2ND COMMENTS

The Policy Team note the minor alterations, however this does not fundamentally change the position outlined in our previous comments

HIGHWAYS OFFICER

Site Characteristics and Background

The site, which currently consists of 2 substantial (A1 use class) retail units (Halfords and Wickes stores) with associated parking, is located on the edge of Uxbridge town centre due northeast of the Harefield Road/High Street intersection. It lies adjacent to Uxbridge Police Station and fronts directly onto Harefield Road which is designated as Classified within the Council's hierarchy of roads. The area north of the site is predominantly residential whilst the area due south consists of predominantly retail and commercial establishments which populate the main town centre.

The proposal is for the provision of 264 flatted units within a high rise build with ground-floor retail floor-space located on the Harefield Road frontage and southern corner of the site envelope.

The address is located approximately 500m from Uxbridge station with generous access to multiple bus routes resulting from the highly sustainable transport related profile of the shopping centre. The level of readily available and sustainable public transport modes are reflected by the high PTAL, which on a scale of 1-6b, is rated at a level of 5 which is considered as 'very good'.

Parking Provisions

C3 Residential

The residential component of the application consists of the following:-

28 - Studio flats

104 - 1 bedroom flats

119 - 2 bedroom flats

13 - 3 bedroom flats

There is currently a parking quantum of 141 spaces that is provided for the two substantive retail units. The proposal is for a 'car free' development with a nominal provision of disabled compliant parking spaces (totalling 9) which is in line with the draft London Plan Policy T6.1 which requires 1 space per 3% of dwelling units.

Utilising the Hillingdon saved UDP standard, the recommended maximum required parking quantum would be in the region of 396 spaces which equates to an approximate 1.5 parking space ratio per

dwelling. The relative absence of on-plot provision for this proposal therefore falls short of the adopted UDP and emerging Local Plan policies which favour a parking provision given its outer London borough status and the modal choice challenges this brings for Hillingdon's residents, both incumbent and new occupiers, who need to travel to destinations extraneous to Greater London (GL) by using convenient major road links such as the M4, M25 and A40/M40 corridors. Such travel choice by private motor car is mainly due to the expensive and inconsistent availability of public transport nodal links outside of London.

It is accepted that this site exhibits a high PTAL which encourages the provision of 'car free' development in accord with the current and emerging London Plan. However the PTAL calculation is based on public transport connectivity by bus and rail within the London area alone and does not reflect the deficiencies in connectivity of the public transport network farther afield for commuters residing in outer London boroughs who wish to travel to destinations outside the confines of GL. As a result such reliance on the private motor car as a modal travel choice for Hillingdon's residents is well established.

Major national and regional rail infrastructure projects such as HS2, Crossrail (including the Elizabeth Line), 'Western rail link to Heathrow' Network Rail enhancements are in various stages of progress and may provide some overall public transport benefit in the longer term within and outside of the borough. However despite any potential benefit delivered it is unlikely that it will be substantial enough to significantly alter the modal choice of communities residing in Outer London boroughs such as Hillingdon who are heavily dependent on private transport for the reasons highlighted above. The private motor vehicle is therefore likely to remain as the mode of choice for many individuals by reason of convenience and cost effectiveness for the foreseeable future.

The determination of the suitability or non-suitability of a 'car-free' scheme can also be reliant on a number of extraneous factors to the site itself. The local characteristics of the surrounding network are one of the factors that need to be taken into consideration as they can significantly influence the internal workings of a site and therefore impacts beyond.

With this particular site, it is apparent that the vast majority of the surrounding road network acts as a natural deterrent to an alternative parking facility for 'would be residents' of the redevelopment. This deterrent is realised by virtue of the extensive local town centre parking restrictions which include a controlled parking zone (CPZ) that surrounds the location which inherently assists in discouraging the likelihood of untoward parking displacement onto the public domain. This relative lack of 'free of charge' on-street parking availability can also act as a deterrent to multiple or even single car ownership for a prospective occupier of a new unit within the proposal site. This is especially true when potential occupiers view a property prior to rental or purchase and observe relatively limited on-site parking allocations and non-existent on-street parking availability in proximity of the address. This is a factor that is very likely to be high on the list of considerations prior to occupation which allows for an informed decision to be made on whether the address suits the life demands of the potential occupier.

There is a balanced debate to be had here with some occupiers deciding to proceed with property acquisition on a 'car free' basis assisted by the high site PTAL which would help conform to the sustainable travel agenda thereby reducing parking demand as promoted by the required travel plan for this site (which will be discussed later), whilst others will desire on-plot spaces to cater for their personal transport destinations outside of the London area as discussed earlier.

Notwithstanding with the above the need to encourage sustainable modal travel choice is acknowledged on a local, regional and national level hence in the spirit of compromise between the regional London Plan and local Hillingdon parking standards, a minimum on-plot parking ratio per dwelling of 0.5 is sought in lieu of the 'car-free' proposal which equates to approximately 130 spaces. This is substantively below Hillingdon's maximum adopted standard requirement of a 1.5 per unit ratio which would demand just under 400 spaces.

When contextualising all of the above, a low level of on-site car parking provision for this site consisting of approximately 130 spaces is considered appropriate and is therefore recommended. The submitted 'car-free' proposal, with nominal disabled compliant parking, is therefore considered unacceptable.

Electric Vehicle Charging Points (EVCP's)

The parking requirement for EVCP's in line with London Plan 2016 (LP 2016) standards for this C3 use and the quantum of on-plot disabled compliant bays would equate to 2 EVCPs for 'active provision' with a minimum of a further 2 spaces acting as 'passive' provision for future activation. Although this has not been indicated by the applicant, this requirement can be secured via appropriate planning condition.

Cycle Parking

In terms of cycle parking there would be a provision of 485 secure and accessible spaces in total for residents and visitors located on the ground floor throughout the site which is acceptable in format and design layout terms. The quantum is welcomed as it conforms to and exceeds LBH Local Plan - saved UDP and London Plan minimum standards.

Parking Provisions

A1/A2/A3 Retail and B1 Employment Use

The applicant is proposing a zero parking provision for the retail and business elements given the relative small sale of this aspect (332sqm GIFA). In accord with the LBH saved UDP standard, a quantum of up to 8 spaces would normally be required for this level of scale assuming the GIFA is apportioned accordingly. It is reasoned that to justify a 'car free' status for the use, demand will be very local to the development and public transport/pedestrian based given the town centre location which includes patronage by new occupiers of the address. Hence car borne demand is predicted to be relatively low to non-existent. For this reasoning, a 'car free' scheme related to the retail and employment provisions is considered acceptable.

Cycle Parking

For the scale of proposal (332sqm GIFA) there would be a requirement for up to 16 secure and accessible spaces to be provided on-site. Although no specific reference to provision has been made, it is considered that the cycle parking 'over-provision' for the residential element can cater for this demand. This aspect of cycle provision is required to be secured by planning condition.

Parking Management Strategy (PMS)

On the premise of best controlling parking provisions and usage within the site which includes new residential disabled compliant and servicing provisions, it is considered that the application of a PMS is a key tool which helps to ensure an unhindered and functional operation for the parking uses within the site envelope. This involves creating an internal site management regime that would enforce and oversee overall parking control on a site wide basis thus ensuring the harmonious and mutual coexistence/interplay of parking bay allocations and servicing needs. The PMS can be supported by enforcement structures which encourage the correct use of parking places which assists in ensuring that parking demand and allocation is properly managed. The PMS should also set out the methodology behind the allocation/control of parking places for the dominant residential use and would be secured by planning condition.

Traffic Generation - C3 /A1/A2/A3/B1 use classes

As the proposal is based on a 'car-free' operation with a nominal provision of 9 on-plot disabled compliant parking spaces, there are no specific concerns with the proposal as there would be an expected and substantial decrease in vehicular activity, to and from, the site when compared to the existing activities relating to the two retail units on the site. When comparing the existing low projected usage of the site (which includes disabled bay usage and servicing demands) a traffic peak hour reduction in excess of 100 vehicle movements would be expected hence there is substantive highway gain in this respect. As a consequence there are no specific mitigation requirements for enhancing the local road network via financial contribution related to public realm betterment.

Demand for the non-residential use classes would be expected to be negligible as any related

activity is anticipated to consist of diverted/pass-by trips ancillary to existing town centre attractions coupled with potential demand from the new occupiers of the site and henceforth does not raise any anticipated issue or concern. Any related servicing demand is not predicted to be at a level that would raise measurable concern and would be facilitated by a new servicing lay-by provision, located directly fronting the site off Harefield Road, involving kerb-line and public footway alterations. The proposal is considered acceptable in principle and is discussed in greater detail later in this report.

Appraisal of the Site Access Infrastructure

The vehicle access arrangement from Harefield road is to remain in position functioning as a shared access/egress facility for disabled parking bay users and servicing functions such as refuse collection but with minor adjustment/enhancement to provide a more user friendly design environment i.e. pedestrian tactile paving provision etc.

A secondary access via the southern end of Warwick Place (a no-through road adjacent to Uxbridge Police Station located off Harefield Road) which is currently used for servicing the retail provisions is to remain. It will serve predominantly as a pedestrian access to the site envelope linking to Beasley's Yard which is a private footpath adjacent to the site, off Warwick Place, which emerges onto the High Street and provides a convenient 'cut through' to and from the town centre. The proposals are broadly acceptable in principle due to the anticipated high generation of site related footfall and low traffic generation subject to detail design. Where applicable, relevant designs and implementation would be arranged by legal agreement via S278 of the Highways Act 1980 with all related implementation costs being absorbed by the developer at source negating any up front financial contribution to the Council.

Internal (thru-site) Roadways/Cycling/Pedestrian/Service Provisions

The internal roadways give acceptable access to all of the allocated residential disabled compliant parking spaces and servicing needs with designs broadly conforming to the Department for Transport's Manual for Streets 2007 (MfS) (circa 2007) established road layout design standards for new developments. The design layout benefits pedestrian and cycling permeability through the site by virtue of newly created 'internal to site' pedestrian/cycling linkages connecting to the external public domain. This arrangement is therefore welcomed as is the proposed DDA compliant footway (referred to in the previous sub-heading) which is to be provided from Warwick Place along the southern perimeter of the site.

It has been demonstrated that the roadways within and adjoining the site boundary with the adopted public highway can satisfactorily cater for service, refuse collection and emergency vehicles without hindrance by allowing such vehicles to enter and leave the site in a forward gear thereby conforming to the MfS established standards and best practice.

As highlighted earlier, the applicant has proposed a new servicing lay-by provision located directly fronting the site off Harefield Road. To facilitate the lay-by, kerb-line alterations and footway realignment would be required. The footway realignment would therefore be required to encroach within the site envelope which is un-adopted public highway. As a principle, the footway provision should fall within the Council's control as a publicly adopted highway to safeguard continuity of the local public footpath network. On this premise there would be a requirement for a parcel of land from the site curtilage to be dedicated to the Council by way of adoption. This adoption of the new highway would need to be undertaken under sections 38 & 278 agreement of the Highways Act 1980 with agreement to enact the process to be secured under section 106 of the Town and Country Planning Act 1990.

It is noted that the land within the site rises considerably from the public highway at the proposed location hence level differences will need to be addressed in order to allow satisfactory use of the realigned footway and convenient/workable 'service related' access and use of the new lay-by. Such detail would be agreed via the aforementioned process by securement of the aforementioned legal agreements. The proposal is therefore considered acceptable and 'fit for purpose' in principle.

Development Footfall

It is a normal requirement for this scale of residential development to be accompanied by a Pedestrian Environment Review System (PERS) audit in order to provide an inventory of local pedestrian facilities thereby allowing an informed determination of the suitability of the local highway network to be made in order to cater for the uplift in foot traffic generated by a proposal. The applicant has not provided this audit and footfall estimations arising from proposal have not been assessed. However it can be anticipated that the quantum of development has the potential to generate well in excess of 500-600 new occupiers. At present the established footfall to and from the site is transient and not excessive as the choice of transport mode for most customers of the two established retail units is by motor vehicle. There is some foot traffic generated by the retail uses which is partially encouraged by the '1 hour maximum stay' free parking regime of the car park which results in some pedestrian 'linked trip' activity due to the proximity of the town centre. However from observation, this level of activity is of relatively low significance.

The projected footfall from the proposal would therefore impinge on the public realm with additional demand on the footway infrastructure, mainly toward the main town centre which already has a high existing demand on provisions.

When reviewing the locality it is clear that there are some physical deficiencies within the existing footway network and pedestrian provisions. It is also apparent that there is no one perfect solution which can address all the aspirations and desires the Council has for improving this aspect of the public realm however the proposal furnishes an opportunity for public realm infrastructure gain which would be complementary to the aims within the Council's 'Uxbridge Town Centre Strategy 2016'. These gains would be secured by legal agreement

In the absence of a submitted PERS audit, it is therefore considered reasonable and appropriate to require developer financed enhancements (via a s106 agreement) to the public realm with a view of encouraging and improving sustainable travel modes including pedestrian permeability as follows:-

- General public realm town centre pedestrian and bus related quality enhancement to include the junctions of Harefield Road/High Street and High Street/Belmont Road.
- Improved area wide Bus service infrastructure provisions.
- Enhanced quality of pedestrian and vehicular public realm town centre connectivity by provision of a shared surface (vehicular and pedestrian) in Harefield Road between the Harefield Road/High Street junction and Oxford Road roundabout.
- Tactile crossing provisions and public lighting improvements on Harefield Road, Warwick Place and the High Street in vicinity of the site envelope.
- Enhancement of footpath linking Harefield Road and Lancaster Road.

(Please note this list is indicative and not necessarily exhaustive and may therefore be subject to alteration - costing to follow)

Travel Plan - Residential

Irrespective of the proposal being a 'car-free' development, an overarching Framework Travel Plan (FTP) has been submitted in order to capture and develop the residential element on an area wide basis encompassing the whole site. A specific and detailed residential plan will emerge and inform this overarching FTP as the monitoring regime unfolds subsequent to occupation.

This approach conforms with Transport for London's (TfL's) guidelines as it addresses all good practice mechanisms necessary to achieve a modal shift away from the private motor car thereby leading toward a sustainable personal travel mode to and from the site. The FTP represents a long term strategy for managing travel by residents, visitors and delivery related activities. It supports measures that promote and support sustainable travel choices and reduce single occupancy car journeys. These measures would for example include marketing and promotion of sustainable travel modes, encouragement of travel.

Each of the new residential occupiers would receive a 'Residential Travel Pack' to promote sustainable travel by suitable means such as public transport, walking and cycling.

Implementation, monitoring and management of the FTP would be undertaken by an appointed travel plan co-ordinator (TPC) who would work in partnership with Hillingdon and TfL together with stakeholders within the site.

The TP would therefore be reviewed on an on-going basis with travel surveys undertaken upon

occupation of the development and thereafter at years 1, 3 and 5 to monitor its effectiveness as compared to the initial survey. A monitoring report would be produced by the TPC following each survey with distribution to all relevant parties including the local authority for review.

Specific SMART percentage modal shift targets have been set which is a pre-requisite requirement under TfL guidance. Under the FTP, overall anticipated sustainable modal targets related to the use of public transport, walking and cycling would be in the order of 58%, 27% and 4 % respectively following the 1st year of monitoring after first residential occupation.

To sustain and enhance these aims, modal shift targets relating to these three sustainable travel modes have broadly indicated an across the board 3-4% increase over a five year period.

The methodology of the TP together with the above targets is broadly accepted and welcomed and, at subsequent monitoring years 3 and 5, these figures would be re-evaluated as part of the monitoring process. The TP is to be secured under an overarching S106 legal agreement.

Construction Logistics Plan (CLP) and Service Delivery Plan (SDP)

A full and detailed CLP and SDP will be a requirement to be secured under planning condition given the constraints and sensitivities of the local road network. A brief reference to servicing has been made within the assessment mainly with regard to the ability of larger vehicles entering and leaving the site in a satisfactory manner. The SDP is required to accord with TfL's delivery and service planning guidance. Both plans will need to be secured under planning condition in order to avoid/minimise potential detriment to the public realm.

Conclusion

The application has been reviewed by the Highway Authority and it is considered that the proposal, presented as 'car free', would be prejudicial to new residential occupiers who would be disadvantaged by a lack of personal travel modal choice options to destinations extraneous to the Greater London area owing to the deficiencies in public transport availability and connectivity outside the confines of London which would be exacerbated by the absence of on-plot parking facilities, contrary to policy AM14 of the Development Plan (2012). Refusal on insufficient parking grounds is therefore recommended.

HIGHWAYS OFFICER - PUBLIC REALM CONTRIBUTION

Under section 106 of the Town & Country Planning Act 1990, the financial contribution of £361,500 offered by the developer towards public realm betterment together with an acceptance of a travel plan bond amounting to £20,000 satisfies the Council's vision of encouraging and improving sustainable travel modes within the proximity of the proposal which includes pedestrian permeability and public transport enhancement within the local town centre area.

SUSTAINABILITY OFFICER

I object to the proposals on Energy grounds:

1 - Energy Assessment

The energy assessment appears to provide two very different baseline positions. Table 7.1 states the regulated energy load for the residential development is 309tCO₂ and 5tCO₂ for the non residential equating to a baseline total of 314tCO₂. However, table 11.1 sets a baseline total of 489.75tCO₂.

It is not clear what the starting point for any savings is.

2 - Allowable Solutions

The energy assessment makes little reference to the zero carbon requirements of the London Plan. However 11.8 of the assessment states:

The above represents a site wide saving >35%; however, relative to the respective carbon reduction policy targets, an annual shortfall of 300.75 tonnes has been identified for the residential (zero

carbon target) and 0.40 tonnes for the commercial (35% on site). A total of 304.67 tonnes will therefore be offset using "Allowable Solutions" in lieu of savings on site.

Assuming this is correct (see point 1) then the applicant will need to enter into an agreement for £548,406 in allowable solutions, i.e. the sum of money required to make up for the failure of the site to deliver zero carbon.

Allowable solutions should be a last resort and used to offset the shortfall in the target that cannot be delivered on site having exhausted all possible attempts to achieve the zero carbon figure.

The energy assessment appears to default to the bare minimum requirement without justification or explanation. Furthermore, it is unclear as to whether the applicant understands the extent of the allowable solutions as the energy report includes no calculation.

Remedy

1 - The energy assessment should be revised to omit table 7.1 and provide a clear baseline position.

2 - The assessment should be revised to show a greater application of low and zero carbon technology to achieve closer to the zero carbon standards of the London Plan.

3 - The applicant should confirm in writing their agreement to an offsite contribution of £1800/carbon tonne (i.e £60/tonne for 30years).

Case Officer's comments:

The comments provided by the Council's Sustainability Officer were forwarded to the applicant for their consideration on the 9th August 2018. The applicant responded to the Sustainability Officer's comments via email (dated 21st August 2018):

'- Table 7.1 included data associated with a former iteration of the scheme. It has now been updated in line with the data presented in the summary section.

- The policy position regarding "zero carbon" is understood and references to the relevant policy and "Allowable Solutions" confirm this point.

- The stated tonnage for offsetting should have been 301.15 (i.e. 300.75 + 0.40) rather than 304.67. This equates to an Allowable Solutions contribution of £542,070.

- Contrary to suggestions made by the council, the development goes beyond the policy minimum as evident by the surplus savings being made by the residential units.

I trust the above, in conjuncture with the supporting updated Energy Statement, suitably addresses the comments made to date.'

SUSTAINABILITY OFFICER 2nd comments:

I object to the proposed development:

Energy

The energy strategy does not demonstrate sufficient attempts have been made to secure zero carbon development as required by the London Plan (Policy 5.2). The assessment shows a reduction of 35% in tCO₂ per annum but this is the minimum requirement. Insufficient evidence has been presented as to why a greater degree of saving cannot be achieved on site. As a consequent, the proposals would result in the need for an offsite contribution. Based on the energy assessment, this would be c£500,000. This would be acceptable provided there is clear justification as to why greater savings cannot be achieved on site.

Furthermore, the energy strategy states:

"The design of the glazed areas will seek to offer good access to natural daylight to reduce

consumption of energy for artificial lighting. Overall, a balance shall be sought between achieving daylighting levels and winter solar gains, whilst minimising summer heat gains and cooling loads."

The designs attempt to maximise the site's capacity through multiple storey units. No daylight/sunlight assessment has been undertaken of the building itself; the submitted assessment only relates to the impact the development will have on other units. The design is such that some units will be shadowed for large parts of the day by large expanses of built form, particularly those at lower level and those that are single aspect; in these instances limited natural lighting will be achieved resulting in a higher lighting demand. At present there is a disconnect between what the energy strategy requires and what the designs are showing.

Daylight and Sunlight and Wind

As set out above, there is insufficient information on sunlight and daylight to the properties within the development as well as the proposed outdoor space. In particular the courtyard in the middle of Block C would appear to be in considerable shadow as it is bordered on three sides with high storey buildings and with a north easterly exposure. This would constrain the quality of this open space.

Similarly, no information on the impact of wind has been provided to demonstrate that the open space is usable. Again, this is a significant concern given the concentration of tall buildings around the open space presenting a wind tunnel affect.

Requirements

The applicant needs to:

- 1 - Provide an update energy strategy showing a greater degree of onsite savings, or justify why more can't be saved onsite. If the latter is an appropriate course of action, the applicant needs to confirm agreement to an offsite contribution of £1800/tCO₂ (c£500,000).
- 2 - Provide a daylight/sunlight assessment of the units within the building together with the impacts on the open space.
- 3 - Provide a wind analysis and microclimate assessment on the open space and at ground level around the development.

AIR QUALITY OFFICER

The assessment has included the provision of air quality monitoring which has indicated there is no requirement for the provision of mechanical ventilation to protect future residents from the ingress of polluted air. However, there is no detail as yet in regards to the provision of energy.

The car parking associated with the proposed development is drastically reduced from current use therefore it is not anticipated, in the air quality assessment, that the operation will cause additional congestion on the highway. The submitted Travel Plan also indicates proposed targets for a 13% increase in the use of sustainable mode of transport.

The air quality neutral assessment indicates the development is within the benchmarks set for building and transport emissions. However, the proposed development is just within the Uxbridge Air Quality Focus Area and in these cases the Council require a calculation of the damage costs of the increased emissions associated with the development. This has been calculated as £29,049, however this is without the reductions in costs that would be applied from mitigation measures which reduce these emissions such as the high level of modal shift from the Travel Plan and any public realm enhancements in terms of increased facilities for cycling and walking. Once mitigation has been applied it is likely this amount could be reduced substantially.

Should this scheme be approved the following conditions should be applied:

Non-road mobile machinery condition (NRMM)

No development shall commence until proof of the registration in GLA's database

(nrmm.london/nrmm/about/what-nrmm-register) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority. From 1 September 2015 NRMM of net power between 37kW and 560kW used in London have been required to meet the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition', Compliance with London Plan policy 7.14 and Local Plan Part 1 policy EM8

Energy Condition

No development shall commence until proof that the energy installation meets the appropriate standard required by the GLA Sustainable Design and Construction SPG is submitted to and approved in writing by the LPA as required by the GLA. This must include an Air Quality Assessment which quantifies any potential impacts on existing pollution levels as a result of emissions from the proposed energy installation along with proposed mitigation to reduce the impact including the design and positioning of any flues to not compromise the internal air quality for the proposed residents or the users of any proposed amenity spaces."

Reason: Compliance with the GLA Sustainable Design and Construction SPG, 2014, Compliance with London Plan policy 7.14 and Local Plan Part 1 policy EM8

Low Emission Strategy

No development shall commence until a low emissions strategy outlining the steps taken to reduce emissions from the development has been submitted to the LPA. This should include, but is not limited to, the demolition and construction phase, the choice of energy provision, the promotion of low/zero emissions technologies for occupiers of the site, targets set for increased modal shift to sustainable travel modes, enhanced public realm to support walking and cycling.

Reason: Compliance with GLA 'The Control of Dust and Emissions from Construction and Demolition' SPG, Compliance with the GLA Sustainable Design and Construction SPG, 2014, Compliance with London Plan policy 7.14 and Local Plan Part 1 policy EM8.

AIR QUALITY OFFICER 2nd comments

The damage costs have been calculated as £29,049, however this is without the reductions in costs that would be applied from mitigation measures which reduce these emissions such as the high level of modal shift from the Travel Plan and any public realm enhancements in terms of increased facilities for cycling and walking. I have spoken to the Transport Officer and can confirm that the public realm improvements agreed, along with the proposed Travel Plan negate the requirement for an air quality contribution.

I would however ask that the following conditions are applied:

Non-road mobile machinery condition (NRMM)

No development shall commence until proof of the registration in GLA's database (nrmm.london/nrmm/about/what-nrmm-register) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority. From 1 September 2015 NRMM of net power between 37kW and 560kW used in London have been required to meet the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and Supplementary Planning Guidance 'The Control of

Dust and Emissions from Construction and Demolition', Compliance with London Plan policy 7.14 and Local Plan Part 1 policy EM8

Energy Condition

No development shall commence until proof that the energy installation meets the appropriate standard required by the GLA Sustainable Design and Construction SPG is submitted to and approved in writing by the LPA as required by the GLA. This must include an Air Quality Assessment which quantifies any potential impacts on existing pollution levels as a result of emissions from the proposed energy installation along with proposed mitigation to reduce the impact including the design and positioning of any flues to not compromise the internal air quality for the proposed residents or the users of any proposed amenity spaces."

Reason: Compliance with the GLA Sustainable Design and Construction SPG, 2014, Compliance with London Plan policy 7.14 and Local Plan Part 1 policy EM8

Low Emission Strategy

No development shall commence until a low emissions strategy outlining the steps taken to reduce emissions from the development has been submitted to the LPA. This should include, but is not limited to, the demolition and construction phase, the choice of energy provision, the promotion of low/zero emissions technologies for occupiers of the site, targets set for increased modal shift to sustainable travel modes, enhanced public realm to support walking and cycling.

Reason: Compliance with GLA 'The Control of Dust and Emissions from Construction and Demolition' SPG, Compliance with the GLA Sustainable Design and Construction SPG, 2014, Compliance with London Plan policy 7.14 and Local Plan Part 1 policy EM8

S106 OFFICER

The Council has appointed third party FVA assessor to review the applicants updated viability report to ensure that changes associated with the scheme amendments were fully reflected and further that the values were not understated or costs overstated within the proposed scheme. In addition the assessor provided advice on whether the conclusions reached by the applicants around the level of affordable housing were valid.

The assessor review indicated although the scheme amendments impacted on both the values and costs in the appraisal, the value assumptions adopted were consistent with the inputs adopted within the applicants original review and as such were in agreement.

The assessor undertook their own modelling reflecting the changes to the scheme. Their modelling resulted in a project return or developers return on cost, which is above the return indicated by the applicants but remains below what would be considered a reasonable market return.

Although the assessor did not agree with the applicants' assumptions, given the level of return they did not disagree with the overall conclusions reached the current offer of 20% DMR units (23% by habitable room) would be considered the maximum reasonable.

The assessor suggested the S106 agreement should protect against the possibility of units being sold instead of rented. This would ensure the Council has the ability to capture a share of any value uplift.

Conclusions

In view of the above circumstances, although the Council's third party assessor were not in agreement with all of the applicants' assumptions, given the level of return they did not disagree with the overall conclusions reached namely the current offer of 20% DMR units (23% by habitable room)

would be considered the maximum reasonable in this instance.

Given the Build to Rent housing typology being proposed, it is important that the Council ensures that appropriate safeguards are included within the S106 agreement. Details of Affordable Housing Provision should protect against the possibility of units being sold instead of rented. This would ensure that in this event the Council has the ability to capture a share of any value uplift which ultimately could be used to contribute to the Council's affordable housing provision. In addition, Affordable Housing Review Mechanism should be included in the S106 agreement.

LANDSCAPE ARCHITECT

This site is occupied by two retail units (Wickes and Halfords) at the southern end of Harefield Road, situated to the north of the police station. The buildings are on elevated land and are set well back from Harefield Road beyond a landscaped car park which serves as a visual buffer from the street and residential properties to the north. The main entrance to the site is a ramped access off Harefield Road, with a secondary access off Warwick Place. The site lies within the edge of Uxbridge Town Centre.

There are no TPO or Conservation Area designations affecting the site, however, the existing trees and lower shrub planting contribute to the character and appearance of the area and soften the interface between the commercial town centre and neighbouring residential zone.

Comment

A tree report, by TPM, has assessed 13 individual trees and groups which are on the site, or close enough to be influenced by it. According to the survey there are no 'A' grade trees on the site. G2, T8, G9 (off-site), G10 (off-site) and G11 (off-site) are rated 'B' - whose condition and value would normally merit retention. The remaining trees are category 'C' which do not pose a serious constraint on development.

An Arboricultural Impact Assessment confirms that the following trees will be retained as part of the development proposal; G9, G10, G11, G12 and G13 - which are all off-site / on neighbouring land.

The on-site trees will all be removed to facilitate the development, including the 'B' grade trees; G2 and T8.

A landscape strategy has been prepared by Exterior Architecture. The constraints (3.1) and opportunities (3.2) diagrams fail to acknowledge the on site 'B' grade trees.

The strategy describes the planned landscape objectives (3.3) and character areas (3.4), which includes opportunities to integrate biodiversity and 'urban ecological' elements into the scheme - There is no reference to SUDS. The proposals include the provision of ground level / street planting and green roof terraces intensive, for use by residents and extensive for biodiversity.

An illustrative palette of hard and soft landscape materials is provided.

An ecological survey, by Greengage, has been submitted. The survey concludes that the scheme has negligible potential for roosting bats, low potential for foraging bats and the presence of nesting birds.

The survey recommends that no further surveys are required, external lighting should be designed to avoid impacts to foraging bats and vegetation clearance should be undertaken outside the bird nesting season. Recommended ecological enhancements are noted at 5.6

Recommendation

This scheme is unacceptable as it fails to satisfy saved policies BE38. Existing 'B' grade trees will

be removed to facilitate the development and the proposed landscape layout fails to mitigate the urbanising impact of this development of more than 11 storeys.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The London Plan sets a housing delivery target for Hillingdon of a minimum of 5,593 new homes between 2015 and 2025 (559 per annum). Local Plan Core Strategy Policy H1 seeks to maximise the supply of additional housing in the Borough and states the Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

The Council's Policy Team have reviewed the proposed scheme and provided detailed comments on the principle of the development. In the adopted Local Plan: Part 2 - Saved UDP Policies (2012), the site is within the designated Uxbridge Town Centre boundary, but outside of the Primary and Secondary shopping frontages. This remains the case in the emerging Local Plan: Part 2 - Site Allocations (2015).

The site currently consists of two large A1 retail warehouses with a combined floorspace of 3,150m² and a significant level of associated car parking for customers. The proposed scheme makes provision for 382m² of commercial floorspace, which is approximately 12% of the existing floorspace.

As noted above the site is outside of the Primary and Secondary shopping frontages and as such, the relevant Local Plan policies concerning retention of A1 use in such areas do not apply in this instance. Nevertheless, A1 retail remains an appropriate edge of centre use in line with Annex 2 of the NPPF (2018) and the retail use is also important in strengthening the status of Uxbridge Town Centre in line with Policy E4 of the Local Plan: Part 1 - Strategic Policies (2012). The two large units provide comparison goods, as well as specific services, which are unique to Uxbridge Town Centre and offer diversity from what currently exists on the high street. Support for comparison goods retailing in Metropolitan Town Centres, like Uxbridge, is outlined in Part B of Policy 4.8 of the London Plan (2016). The net loss of 2,768m² of retail floor would need to be justified within this context.

Whilst it is recognised there is potential for a comprehensive mixed use scheme on this site, such a proposal must be in accordance with the policies listed above that seek to protect and enhance the role of Uxbridge as a Metropolitan town centre. Experian data used to inform the London Town Centre Network Health Checks (2016) identifies that in 2016 there was 66,000m² of comparison retail floorspace across the town centre, and the proposed scheme would decrease this level of provision by 5%. In broader terms the proposed loss of retail floorspace through this scheme would be equivalent to about 50% of the total amount of retail floorspace lost within Uxbridge town centre between 2007 and 2016 as shown in Figure 15 of the London Town Centres Health Check report.

Furthermore, no evidence has been submitted on whether the current occupiers of the retail units have been consulted on the proposed plans and whether options have been explored to accommodate their needs within the development proposals. There is also evidence available in a representation submitted by Halfords PLC on the draft London Plan stating that the existing occupiers (Halfords and Wickes) have sought to extend their current leases on the site by 15 years. This demonstrates there is ongoing demand for retail capacity on this site.

In the absence of evidence to justify the loss of retail capacity on this town centre site, or to

demonstrate that options for optimising and enhancing the provision of retail floorspace as part of a mixed use scheme have been explored, the proposed net loss of retail floorspace is considered harmful to vitality and viability of Uxbridge and its status as Metropolitan town centre.

The scheme, if deemed acceptable in design terms, would provide 267 self-contained units in Uxbridge Town Centre through the redevelopment of brownfield land. This approach to meeting housing demand through the efficient use of brownfield land is supported in Paragraph 118 of the NPPF (2018), Policy 3.3 of the London Plan (2016) and Policy H1 of the Local Plan: Part 1 - Strategic Policies (2012). As such, the contribution of these new units would assist in meeting the Council's annual housing target of a minimum of 559 units, thus providing a degree of public benefit through the delivery of new homes in a sustainable location.

Policy H1 of the Local Plan: Part 1 - Strategic Policies (2012) also notes the potential for high quality mixed used developments to meet housing demand, which is also reflected in Policy 3.3 of the London Plan (2016). Policy E4 of the Local Plan: Part 1 - Strategic Policies (2012) also notes that mixed-use development in Uxbridge Town Centre is one of many suitable uses, which notably also includes retail. However, it is important to note that the Council has a consistent history of meeting and exceeding its housing target, as evidenced in the Council's Five Year Supply of Deliverable Housing Sites which was published in December 2017. This document also demonstrates that there is a significant supply of sustainable sites for housing in the pipeline and thus a five year land supply is comfortably demonstrated. Whilst not a reason to refuse a sustainable housing scheme, it should have weight in the degree of public benefit the decision-maker awards to new homes.

When delivered to a high-quality, mixed use schemes in sustainable locations have the potential to achieve multiple public benefits and its value to Outer London is most noted in Policy 2.7 of the London Plan (2016). Alongside the residential element of the scheme, the applicant is proposing 332m² of flexible commercial/retail floorspace across two separate units. No upfront tenants have been identified in the evidence provided to the Council and as such it is taken that they will be advertised to the market post-completion. The units are however substantially smaller than the existing retail units (-2,818m²). The viability of these units would not benefit from any on-site car parking and there is little evidence to suggest they would attract significant footfall in their own right, particularly when compared to the scale of the units that preceded them. Ultimately they would rely largely on the additional footfall from the new residential units being created. Ultimately however the units would not conform to Part A of emerging Policy DMTC 1 of the Local Plan: Part 2 - Development Management Policies (2015).

It is also important to note that within the scheme is a private lounge, function room and gym, which according to 3.2.7 of the planning statement will be accessible to residents only. As such these are isolated uses within a gated community that provide no wider public benefit to the area. At 12-storeys, the scheme would be defined as a tall building. London Plan (2016) Policy 7.7 notes that tall buildings should 'have ground floor activities that provide a positive relationship to the surrounding streets' and 'make a significant contribution to local regeneration'. Emerging Policy DMHB 10 of the Local Plan: Part 2 - Development Management Policies (2015) also states that they should 'be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities'. It is not considered that the non-residential aspect of this scheme achieves either of these objectives. As such, the non-residential element of the scheme represents a tokenistic attempt at creating a mixed-use scheme which would likely add

nominal public benefit to Uxbridge Town Centre. This attempt at a mixed-use scheme does not represent the 'high quality' aspect of high quality mixed use development supported in Local Plan: Part 1 - Strategic Policies - Policy H1.

To conclude, whilst the principle of a high-quality mixed use scheme on the site could be supported for the reasons outlined above, at present the scheme is not of a sufficiently high quality and design, and does not provide the required public benefits or local regeneration. As such the application is recommended for refusal.

Build to Rent

Purpose-built build to rent is a distinct asset class within the private rented sector that is becoming increasingly common across London and is now specifically identified in Annex 2 of the NPPF (2018). Policy 3.8 of the London Plan (2016) specifically references that when determining applications, the planning system should provide positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery. The Mayor's Affordable Housing and Viability SPG (2017) also provides support for and specific guidance on build to rent developments, recognising that they differ to the traditional build for sale model. Certain requirements, including those surrounding covenants, clawbacks, management and tenancy length, would need to be integrated into any potential S106 agreement.

At a local level, the latest evidence of housing need comes from the Strategic Housing Market Assessment (2016) which notes an increasing proportion of the Borough relying on private rent as their current tenure. It is important to note however that, whilst they differ to the traditional build for sale model, new purpose-built build to rent is still required to meet adopted local plan policies and needs to be held to the same design standards as schemes of traditional models.

Residential Mix

Policies H4 and H5 of the Local Plan: Part 2 - Saved UDP Policies (2012) relate to the mix of housing to be provided on new schemes. Policy H4 notes that within town centres, predominantly one and two bedroom developments will be preferable. Policy H5 however also notes that the council will encourage new homes for large families where required, including through the provision of larger dwellings by the private sector in new development.

The latest evidence of local housing need comes from the Strategic Housing Market Assessment (2016) which indicates a substantial borough-wide requirement for larger private market units, particularly 3 bedroom properties. In regards to affordable housing specifically, the need is for 2 and 3 bedroom properties. Paragraph 7.4.9 and 7.4.10 of the Mayor's Housing SPG note that purpose built private rented schemes are typically targeted at smaller households and local authorities can consider applying local policies on unit size mix flexibly in town centre and edge of centre sites. Paragraph 4.31 of the Mayor's Affordable Housing SPG also notes a similar point, highlighting that build to rent schemes should reflect demand for new rental stock, which is typically greater for one and two beds than in owner-occupied or social/ affordable rented sector.

However in light of the Council's latest evidence of substantial requirement for larger private market and affordable units, as well as the high proportion of schemes coming forward in or on the edge of town centres, limited flexibility can be afforded towards the mix on build to rent schemes. The unit mix proposed would be as follows:

32 Studios - 12%

107 no. 1 Beds - 40%
115 no. 2 Beds - 43%
13 no. 3 Beds - 5%

Whereas Policy H4 does say within town centres a high proportion of 1 and 2 bed flats will be acceptable it must be counter balanced with Policy H5 which encourages family homes. As highlighted in the following density section of this report the units per hectare are above London Plan density guidelines, put simply there are not enough family units and 5% only for 3 and 4 bed units is simply not acceptable for a scheme of the scale proposed.

7.02 Density of the proposed development

The application site has an area of 0.927 ha. The local area is considered to represent an urban context and has a Public Transport Accessibility Level (PTAL) of 5. Policy 3.4 of the London Plan seeks for new developments to achieve the maximum possible density which is compatible with the local context. Table 3.2 of the London Plan recommends that for a PTAL of 4 to 6, a density of 200-700 hr/ha or between 70-260 u/ha, (assuming 2.7-3.0 hr/u) can be achieved for an application site in an urban setting. For a suburban setting a density of 200-350 hr/ha or between 70-130 u/ha, (assuming 2.7-3.0 hr/u) could be achieved. Given that the application site is close to the Town Centre it could be argued that it is an urban setting, however the site is also adjacent to two storey residential properties, so some flexibility in the interpretation of the setting is required.

The proposal seeks to provide 267 residential units. This equates to a density of 288 u/ha or 693 hr/ha. This level of development is above the guidelines set out within Table 3.2 density matrix of the London Plan, even assuming the site is within a strictly urban setting.

The proposed scheme must be able to demonstrate that the units will have good internal and external living space, and that the scale and layout of the proposed development is compatible with a high quality design and creating a successful residential environment. These issues are discussed elsewhere within this report. However the density level proposed is contrary to Policy 3.4 of the London Plan (2016) and as such the scheme represents an over-development of the site that would be more appropriate to a central London location rather than an outer London borough and adjacent to existing two storey residential properties. The application is therefore recommended for refusal.

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

Policy BE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that new development within or on the fringes of conservation areas will be expected to preserve or enhance the features, which contribute to the conservation area's special architectural or visual qualities.

Although not within a designated area, the site is in a sensitive position surrounded by heritage assets. To the south is the north western section of the Old Uxbridge/Windsor Street Conservation Area which is focussed on the High Street. The north side closest to the site has a run of grade II listed buildings, numbers 118-123. Opposite on the south side are the grade II listed The Cedars and Old Bank House. An alley leads off to the north to Beasleys Yard where there is the Grade II listed Watts Hall. There is a further run of listed buildings commencing on the other side of the alley, numbers 126-135 High Street and these are terminated by the grade II listed The Crown and Sceptre Public House (now Whelans). Opposite the site on Harefield Road is the locally listed Uxbridge Magistrates Court and to the north east the North Uxbridge Area of Special Local Character.

The Council's Conservation Officer has reviewed the proposals and provided detailed comments. There is no in principal objection to the demolition of the buildings on the site or

the redevelopment of the site with regards to the surrounding heritage assets. However the proposal incorporates one twelve storey tower with an eight storey block of flats located behind the north west end of the High Street and a further eight storey tower set closer to the Harefield Road with a four storey block along the Harefield Road.

The Council's Conservation Officer has objected to the scale of the proposal stating that the impact on the surrounding heritage assets is wholly unacceptable and should be resisted. The towers should be omitted and the overall height of the development should be significantly lower so that its impact is neutral, first and foremost, on the setting of the listed buildings and conservation area and then to a lesser but still important degree on the setting of the locally listed building and the Area of Special Local Character.

The Council's Conservation Officer therefore recommends that the application be refused on the grounds that the proposal would not preserve the setting of the listed buildings (Planning (Listed Buildings and Conservation Areas) Act 1990, 66 (1). Nor would the development within the setting of the conservation area, locally listed building or ASLC enhance or better reveal their significance (NPPF 2018, 200). There does not appear to be a clear and convincing justification for the harm to the setting of the designated heritage assets (NPPF 2018, 194). The proposal would indirectly affect the non-designated assets of the locally listed building and ASLC and on balance the negative impact of the proposal engendered by its overwhelming scale would not be acceptable given the significance of these heritage assets (NPPF 2018, 197). Finally, the proposal would be contrary to the Hillingdon Local Plan that seeks to preserve and enhance the borough's heritage assets and their setting (SO1 and HE1).

Archaeology

The planning application lies in an Archaeological Priority Area as identified in the Local Plan. The applicant's archaeological desk-based assessment shows that remains of a Bronze Age settlement and land boundary ditches were found during an investigation conducted in 1993-4. These are part of an extensive Bronze Age landscape covering much of the Lower Colne Valley. There appears to be a trackway aligned on the natural crossing point over the Colne at the site of the medieval bridge. The eastern and central parts of the site were investigated and ground levels subsequently reduced so there is very limited potential in these areas. However, the western part of the site was not investigated and may have greater surviving potential. Any surviving remains would be harmed by the proposed new build.

English Heritage Greater London Archaeological Advisory Service (GLAAS) has reviewed the submitted documentation and requested the attachment of a condition should the application be granted consent. Subject to the attachment of such a condition there are no archaeological concerns with the proposed development.

7.04 Airport safeguarding

The application site lies approximately 3.46km to the west of the end of the main runway at RAF Northolt. The site occupies the aerodrome height, birdstrike and technical statutory safeguarding zones surrounding the aerodrome.

The National Air Traffic Services (NATS) and the Ministry of Defence, Defence Infrastructure Organisation have been consulted on the proposals and whilst (NATS) raise no objections to the proposal they have suggested conditions relating to the use of Cranes, the submitted Bird Hazard Management Plan and a Construction Management Plan.

The Ministry of Defence, Defence Infrastructure Organisation (DIO) have raised an

objection to the development however, stating that the proposed development site is also within the safeguarding area protecting the operation of the Instrument Landing System (ILS) and the Precision Approach Radar (PAR) that surveys the Western approach to the main runway at RAF Northolt. Due to the height of the proposed residential blocks, performance of the PAR will be affected by this development; and the Ministry of Defence DIO therefore objects to this application in its current form.

The applicant has submitted an aviation report in support of the application (Harefield Road Development, Uxbridge: Assessment of Impact on Heathrow Airport and RAF Northolt dated March 2018). The report considers the impact of the development on the PAR at RAF Northolt and states that as there are existing buildings in the area which would shield the building from the radar and will therefore cause no impact to the radar. However, the DIO have stated that none of the existing buildings identified in the report lie between the radar and the development site so therefore these buildings would not shield Harefield Road from the radar.

The MOD maintains a statutory objection to this proposal in its current form. As such the proposals are deemed to have an unacceptable impact on airport safeguarding and the application is recommended for refusal.

7.05 Impact on the green belt

The site is not located within or close to the Green Belt, as such there are no Green Belt issues relating to this application.

7.07 Impact on the character & appearance of the area

Policy BE13 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that the layout and appearance of new development harmonises with features of the area which are considered desirable to retain or enhance. Policy 3.5 of the London Plan (2016) states the the design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density, tenure and land use mix.

The Council's Urban Designer has reviewed the submitted proposals and provided detailed comments. They raise strong objections to the proposals for numerous reasons, stating that the proposed development is a complete juxtaposition to the local suburban area and edge of town centre location, due to the jump in scale from two to twelve-storeys. The abrupt change in scale does little to soften the transition in height and is considered inappropriate for this location, due to the severity of the proposed change that will impact the streetscene and townscape setting.

Regarding the wider context, the proposed development is a series of very tall buildings for the area. There are only a handful of buildings that are considered 'tall' in Uxbridge. The maximum height to date has been circa twelve-storeys, but this is for a central and well connected location in the town centre. These instances are contained within a cluster of other tall buildings on a very large development site in the central town centre area and part of wider large-scale mixed use development. It is also worth noting that the taller elements in existing developments are more slender, with meaningful breaks in the building line and generous separation distances between the taller blocks. This application does not embody any of these design principles nor benefits from this central location, therefore does not justify such a large and unrelenting height, scale and massing for its edge of town centre location.

In addition the other taller buildings and more intensive development sites reside within the lower topographical areas, which has helped to reduce their impact. Therefore, the

proposed eight-storey and twelve-storey elements of the development are further compounded by the site's topography that will see the buildings extrude from a strong topographical location that will amplify the impact of these tall buildings. The impact will further accumulate with little or no breakdown in the sheer height/scale/massing of the proposed buildings. For these reasons the proposed development is considered inappropriate for its location. There has been little or no townscape analysis to establish the wider town centre and hinterland context as a justification for extending the tall building typology beyond the town centre core. The development will clearly be seen from areas far wider than just the Harefield Road, High Street and town centre areas alone.

Planning policies and best practice principles state that good urban design should be encouraged and it is an important part of the development process. Poor designs that are out of scale and/or character with their surroundings are generally not acceptable. The careful design of new buildings, and the spaces between buildings, respecting the historic and architectural character of the area and features of particular interest, can enhance town centres and the hinterland areas, to maintain local distinctiveness. The proposed development is deemed to fail to meet any of these objectives.

It is also worth considering that the NPPF clearly outlines the importance of good design. It specifically references the prevailing character and setting of an area with regards to development impact on the existing context. And high quality buildings and spaces should be sympathetic to the local area, which is fundamental to creating sustainable development/ positive growth where people want to live and work. Unfortunately, the scale and impact of the proposed development is too much for the proposed site and it will also severely impact on the character and appearance of the local area.

The principle of a gated development is also considered unacceptable in this location. If the ground floor areas are active and the street is well overlooked, thus residents should take ownership of the space and therefore the development will be 'self-policing' to discourage anti-social behaviour and crime. Also, a scheme of any scale, with an active range of uses, should generate sufficient footfall to make the place feel welcoming and safe. The site is currently a retail park, but this level of non-residential activity has not been replaced. The act of gating a develop will in effect turn its back on the surrounding area and therefore will encourage poor integration with the surrounding neighbourhood and conflicts with the principle of place-making and good urban design.

As such the overall development is considered to be of an inappropriate scale, layout and design that would have a detrimental impact on the character and visual amenities of the surrounding area, failing to encourage integration and thus failing to accord with Policies BE13 & BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy 3.5 of the London Plan (2016) and the NPPF (2018).

7.08 Impact on neighbours

Policy BE21 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) states that planning permission will not be granted for new development, which by reason of its siting, bulk and proximity, would result in a significant loss of residential amenity of established residential areas. The Council's Supplementary Planning Document 'Hillingdon Design and Access Statement' (HDAS) states that where a two or more storey building abuts a property or its garden, adequate distance should be maintained to overcome possible over domination. The distance provided will be dependent on the bulk and size of the building.

The applicant has sought to maximise the level and scale of development on the site with

the building footprints pushed close to the site boundaries. Block A would be located on Harefield Road with the element of Block A fronting on to Harefield Road proposed to be four stories in height and maintain the existing building line with residential properties to the north. The Block would however be 'U' shaped with the rear element of the building being eight stories in height and located approximately 22m from the rear of the existing dwellings. This relationship is considered to be unacceptable as the eight storey block would result in a significant overdominance to the south of these properties.

Block B is proposed to be located only 2m to 3m off the north eastern boundary of the site. This block would be between 31m and 33m from the rear elevation of properties on Lancaster Road due to the substantial length of the gardens to the rear of these existing properties. However the proposed Block B would be a solid building that would be viewed as a 'wall' of development to the south of these dwellings. The proposed development would be set too close to the application site boundary to allow for the introduction of any soft landscaping of a sufficient scale to mitigate the visual impact of this block. As such it is considered that the impact of Block B on the amenity of neighbouring properties on Lancaster Road is unacceptable in terms of overdominance and outlook.

Block C is proposed to be set against the south east boundary of the site and would be between nine and twelve stories in height. Whilst the closest residential properties on Wilmar Close are approximately 40m away, the juxtaposition between two storeys and nine stories on the application site boundary is considered to be unacceptable, representing a significant reduction in the outlook of these properties and a significant level of overdominance.

Roof terrace spaces (mid to high level) will effectively create an additional storey, since there is no setback from the edge, creating active edges that will further compound the proposed height of the development and overlooking concerns to neighbouring existing dwellings, and within the development itself.

Therefore in terms of overdominance, the massing of the proposed four, eight and twelve storey buildings relative to the two storey properties adjacent to the site is considered to be unacceptable. It is considered that the separation distance would not be sufficient to avoid overdominance to these adjoining properties and as such, would significantly detract from the amenities of neighbouring occupiers.

As such the proposed scheme is deemed contrary to Policy BE21 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the Council's Supplementary Planning Document 'Hillingdon Design and Access Statement' (HDAS).

Privacy

Policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) seeks to ensure that the design of new buildings protects the privacy of the occupiers and their neighbours. The supporting text to this policy states that 'the protection of privacy, particularly of habitable rooms (including kitchens) and external private amenity space is an important feature of residential amenity'. Whilst the proposed scheme has maximised the development footprint of the site by locating building close up to the site boundaries, it is considered that sufficient privacy distances in excess of 21m would be maintained.

Daylight and Sunlight

The application is supported by a daylight and sunlight report that considers the potential daylight / sunlight effects of the proposed development on adjoining residents. The

applicant's Daylight and Sunlight assessment concludes that the development is expected to have a minimal impact on daylight and sunlight received to surrounding properties following a modelled assessment.

The adjoining properties 14-16 Harefield Road are likely to experience overshadowing of their amenity space, however the impact is on the area of garden. The garden is very long and therefore the majority of the overall garden is unaffected. To this end, refusal on these grounds is not considered to be a defensible reason for refusal.

Commercial Use

There are no concerns raised regarding the impact of the proposed commercial elements on adjacent occupiers subject to conditions regarding hours of use and noise. These conditions would be recommended to be attached to any grant of planning consent.

7.09 Living conditions for future occupiers

Internal Space Standards

All of the dwellings proposed would comply with the internal space standards as set out in Table 3.3 'Minimum Space Standards for New Dwellings' of the London Plan 2016 and the Technical housing standards - nationally described space standard (2015).

External Amenity Space

Two child's play space areas are proposed at either end of the access road turning head, these would be 119 sqm and 60 sqm in size with associated play equipment. Residential amenity space is proposed to be provided with Block A designed around a courtyard space. Roof terraces would be provided within Block A at level 5 and within Block C at levels 1, 4, 7 and 8. Within Block C, the units which back on to the roof terrace would have a private external area with direct access to the roof terrace. 110 of the proposed units would also benefit from private balconies. Additional soft landscaping is proposed at ground floor level. In total 2226 sqm of external amenity space is proposed for the 267 units.

The development includes:

- 32 Studios - (requiring 20m² each = 640m²)
- 107 no. 1 Beds - (requiring 20m² each = 2140m²)
- 115 no. 2 Beds - (requiring 25m² each = 2875m²)
- 13 no. 3 Beds - (requiring 30m² each = 390m²)

In total therefore 6045m² of external amenity space is required to accord with Council policy, which means there is a shortfall of 3819m². In addition the above amenity space includes sections within the shared surface area between buildings that would represent a poor standard of amenity space. In addition a significant proportion of the amenity space proposed, including the child's play space to the north, the central garden within Block A and the podium level of Block C would be positioned to the north of proposed built form that would significantly impact on the level of sunlight/daylight that these areas would receive.

There is also no information on sunlight and daylight to the properties within the development as well as the proposed outdoor space. This would constrain the quality of this open space, and fails to demonstrate whether the proposed development provides suitable amenity for occupants.

The proposed two small play areas are flanked either side by residential dwellings that are only a few meters away. This will constrain their operation with regards to noise and practical hours of usage. The close proximity also raises concerns regarding privacy/overlooking from the residential habitable rooms to the play areas. And the close proximity

of service vehicles that use the adjoining shared surface as the primary access and turnaround space raises further concerns regarding safety and suitable environment. The spaces themselves are very narrow and small. These issues combined highlight the unsuitability of the proposed locations and therefore will compromise their long-term ability to function effectively as play areas or sustain adequate usage.

A majority of the amenity space is provided at roof terrace levels, with a minority of the space at podium level that is very small in proportion to the number of dwellings they are supposed to serve. The layout and location creates a range of overlooking/ privacy, noise and accessibility issues for those elevated spaces, which will constrain their operation and restrict usage due to the small size. The size of these spaces will be further eroded through the defensible space required to protect the units that front the podiums and rooftop areas. Podiums are an acceptable solution if they are circa 1 storey above ground level and the size reflects the quantum of development, which is not the case with this propose development.

Similarly, no information on the impact of wind has been provided to demonstrate that the open space is usable. Again, this is a significant concern given the concentration of tall buildings around the open space presenting a likely wind tunnel affect.

Within the Greater London Authority (GLA) Stage 1 response the Mayor has also objected to this element of the proposal stating that not enough of the proposed units benefit from private external space.

The on-site amenity level, location and size is considered to have been limited by the proposed overdevelopment of the site. For this reason, the low level of external amenity space is considered inadequate, not only in terms of function and location, but also in terms of size to serve 267 homes. The level and quality of amenity space proposed does not accord with the requirements outlined in Hillingdon's Design and Accessibility Statement Supplementary Planning Document - Residential Layouts SPD (2006). As such the application is recommended for refusal.

Internal Layout

In addition to the limited amenity space, there is little soft landscaping or landscape features at grade to serve the residential development or soften the sheer mass and scale of the development within the site for future occupiers. Indeed there will be a loss of existing mature trees. The street-level external space comprises of service roads, car parking and two small play areas. The size and configuration of the ground floor space has been generated by the separation distances between the buildings. The spaces have clearly not been designed as part of the scheme from inception. In effect, they are residual spaces left over after the planning of the building footprints and basic highways requirements to service the site. The result is a very compressed site with lack of external high quality space, with the close proximity of buildings creating a very uncomfortable and oppressive environment, especially considering the height/ scale/ massing of the buildings that are extruded from the excessively large footprints.

The service road appears to be very tight for refuse vehicles. It may 'technically' work, but large vehicles operating in this space will be overbearing due to the close proximity to dwellings. It will also effectively make what little public realm there is in location unusable or potentially unsafe during the hours of operation - especially if there are designated play spaces in close proximity to the shared surface area at either end of the service road.

Internal Privacy

There are general overlooking/ privacy issues for the residential units as proposed. The separation distance between units in Block A is pinched and would provide a separation distance significantly below the level required. If obscure glazing were to be introduced to the access route then the proposed dwelling would have an unacceptable standard of outlook. A further concern raised with the design of Block A as proposed is the inclusion of the access route to properties fronting onto Harefield Road. This arrangement results in access routes directly adjacent to windows of properties without providing any defensible space, leading to an unacceptable lack of privacy. Additional concerns are raised with regard to the podium level and in particular the corner plots where properties would fail to achieve the required level of privacy separation. As such the proposed scheme is deemed to be contrary to Policies BE21 and BE24 of the Hillingdon Local Plan: Saved UDP Policies (November 2012).

Internal Outlook

A portion of the dwellings (50%) and a majority of the habitable rooms are single aspect. This is unacceptable and again indicates the proposed layout is inappropriate for this site, because there is inadequate space between the buildings. The issue is further compounded by the overall height of the proposed buildings that will create a 'canyon' like effect for the ground level area and the dwellings that front these spaces. This will also impact the larger duplex units, which are at the bottom of eight to twelve-storey blocks and therefore not deemed as a suitable environment for families without adequate setbacks and separation between the buildings. This is further compounded by the single aspect nature of the duplex dwellings that should have a secondary aspect, preferable onto a podium deck, to provide a 'back garden' type space that is more suitable for children, rather than a small strip of 'front garden' that is located against the service road, which is too small and inappropriately located for family dwellings.

Within the Greater London Authority (GLA) response the Mayor has also objected to this element of the proposal stating that there are currently too many single aspect units proposed.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Car parking provision

The application site is located approximately 500m from Uxbridge station with generous access to multiple bus routes resulting from the highly sustainable transport related profile of the shopping centre. The level of readily available and sustainable public transport modes are reflected by the high PTAL, which on a scale of 1-6b, is rated at a level of 5 which is considered as 'very good'.

There is currently a parking quantum of 141 spaces that is provided for the two substantive retail units. The proposal is for a 'car free' development with a nominal provision of disabled compliant parking spaces totalling 9 spaces. Utilising the Hillingdon saved UDP standard, the recommended maximum required parking quantum would be in the region of 396 spaces which equates to an approximate 1.5 parking space ratio per dwelling. The relative absence of on-plot provision for this proposal therefore falls short of the adopted UDP and emerging Local Plan policies which favour a parking provision given its outer London borough status and the modal choice challenges this brings for Hillingdon's residents, both incumbent and new occupiers, who need to travel to destinations extraneous to Greater London (GL) by using convenient major road links such as the M4, M25 and A40/M40 corridors.

It is accepted that this site exhibits a high PTAL, however the PTAL calculation is based on

public transport connectivity by bus and rail within the London area alone and does not reflect the deficiencies in connectivity of the public transport network farther afield for commuters residing in outer London boroughs who wish to travel to destinations outside the confines of GL. As a result such reliance on the private motor car as a modal travel choice for Hillingdon's residents is well established.

The Council's Highways Engineer has reviewed the submitted details and raised an objection to the development based on the level of parking proposed, which is well below policy requirements. The submitted proposal, with nominal disabled compliant parking, is therefore considered unacceptable and contrary to Policy AM14 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) and Emerging Policy DMT 6 of the Local Plan: Part 2 - Development Management Policies (October 2015).

The application has been reviewed by the Highway Authority and it is considered that the proposal, presented as 'car free', would be prejudicial to new residential occupiers who would be disadvantaged by a lack of personal travel modal choice options to destinations extraneous to the Greater London area owing to the deficiencies in public transport availability and connectivity outside the confines of London which would be exacerbated by the absence of on-plot parking facilities, contrary to policy AM14 of the Development Plan (2012). Refusal on insufficient parking grounds is therefore recommended.

Electric vehicle charging points (EVCPs)

Should the proposed level of parking be deemed sufficient, the parking requirement for EVCP's in line with London Plan (2016) standards for the proposed residential use and the quantum of on-plot disabled compliant bays would equate to 2 EVCPs for 'active provision' with a minimum of a further 2 spaces acting as 'passive' provision for future activation. Although this has not been indicated by the applicant, this requirement could be secured via appropriate planning condition.

Residential Cycle Parking

In terms of cycle parking there would be a provision of 485 secure and accessible spaces in total for residents and visitors located on the ground floor throughout the site which is acceptable in format and design layout terms. The quantum is welcomed as it conforms to and exceeds LBH Local Plan - saved UDP and London Plan minimum standards.

Parking for proposed A1/A2/A3 Retail and B1 Employment Use

The applicant is proposing a zero parking provision for the retail and business elements given the relative small sale of this aspect (332sqm total). In accordance with the Council standards, a quantum of up to 8 spaces would normally be required for this level of proposed uses. It is reasoned that to justify a 'car free' status for the use, demand will be very local to the development and public transport/pedestrian based given the town centre location which includes patronage by new occupiers of the address. Hence car borne demand is predicted to be relatively low to non-existent. For this reasoning, a 'car free' scheme related to the retail and employment provisions is considered acceptable.

For the scale of proposal (332sqm) there would be a requirement for up to 16 secure and accessible cycle parking spaces to be provided on-site. Although no specific reference to provision has been made, it is considered that the cycle parking 'over-provision' for the residential element can cater for this demand. This aspect of cycle provision is required to be secured by planning condition.

Parking Management Strategy (PMS)

On the premise of best controlling parking provisions and usage within the site which includes new residential disabled compliant and servicing provisions, it is considered that the application of a Parking Management Strategy is a key tool which helps to ensure an unhindered and functional operation for the parking uses within the site envelope. This involves creating an internal site management regime that would enforce and oversee overall parking control on a site wide basis. The Parking Management Strategy can be supported by enforcement structures which encourage the correct use of parking places which assists in ensuring that parking demand and allocation is properly managed and could be secured by planning condition.

Traffic Generation - C3 /A1/A2/A3/B1 use classes

As the proposal is based on a 'car-free' operation with a nominal provision of 9 on-plot disabled compliant parking spaces, there are no specific concerns with the proposal as there would be an expected and substantial decrease in vehicular activity, to and from, the site when compared to the existing activities relating to the two retail units on the site.

Appraisal of the Site Access Infrastructure

The proposals are broadly acceptable in principle due to the anticipated high generation of site related footfall and low traffic generation subject to detail design. Where applicable, relevant designs and implementation would be arranged by legal agreement via S278 of the Highways Act 1980 with all related implementation costs being absorbed by the developer at source negating any up front financial contribution to the Council.

Internal (thru-site) Roadways/Cycling/Pedestrian/Service Provisions

The internal roadways give acceptable access to the all of the allocated residential disabled compliant parking spaces and servicing needs with designs broadly conforming to the Department for Transport's Manual for Streets 2007 (MfS) (circa 2007) established road layout design standards for new developments. The design layout benefits pedestrian and cycling permeability through the site by virtue of newly created 'internal to site' pedestrian/cycling linkages connecting to the external public domain.

It is noted that the land within the site rises considerably from the public highway at the proposed location hence level differences will need to be addressed in order to allow satisfactory use of the realigned footway and convenient/workable 'service related' access and use of the new lay-by. Such detail would be agreed via the aforementioned process by securement of the aforementioned legal agreements. This element of the proposal is therefore considered acceptable and 'fit for purpose' in principle.

Development Footfall

It is a normal requirement for this scale of residential development to be accompanied by a Pedestrian Environment Review System (PERS) audit in order to provide an inventory of local pedestrian facilities thereby allowing an informed determination of the suitability of the local highway network to be made in order to cater for the uplift in foot traffic generated by a proposal.

The projected footfall from the proposal would therefore impinge on the public realm with additional demand on the footway infrastructure, mainly toward the main town centre which already has a high existing demand on provisions.

When reviewing the locality it is clear that there are some physical deficiencies within the existing footway network and pedestrian provisions. It is also apparent that there is no one perfect solution which can address all the aspirations and desires the Council has for improving this aspect of the public realm however the proposal furnishes an opportunity for

public realm infrastructure gain which would be complementary to the aims within the Council's 'Uxbridge Town Centre Strategy 2016'.

Under section 106 of the Town & Country Planning Act 1990, the financial contribution of £361,500 offered by the developer towards public realm betterment satisfies the Council's vision of encouraging and improving sustainable travel modes within the proximity of the proposal which includes pedestrian permeability and public transport enhancement within the local town centre area.

Travel Plan - Residential

Irrespective of the proposal being a 'car-free' development, an overarching Framework Travel Plan (FTP) has been submitted in order to capture and develop the residential element on an area wide basis encompassing the whole site.

A travel plan bond amounting to £20,000 satisfies the Council's vision of encouraging and improving sustainable travel modes within the proximity of the proposals and would be secured through a section 106 agreement should the application be recommended for approval.

Construction Logistics Plan (CLP) and Service Delivery Plan (SDP)

A full and detailed CLP and SDP will be a requirement to be secured under planning condition given the constraints and sensitivities of the local road network.

7.11 Urban design, access and security

The Metropolitan Police have been consulted on the proposals and raised no objections to the details submitted. However they have requested that the development has a Secured by Design condition attached to any grant of planning consent and have also stated that monies should be secured through the section 106 agreement to improve security measures within land that directly neighbours this site, which will be affected if this planning application is approved. 126 High Street, Beasley's Yard is a pathway that runs next door to McDonalds on the High Street. The design of this development will result in increased footfall in this area because it will be the most direct route from the proposal site to the High Street.

The Metropolitan Police have advised that at present this area suffers from anti-social behaviour and drug use, this is in part due to its close proximity to a number of licensed premises, but largely down to its design as it suffers little natural surveillance or activity and can be accessed from two directions. At present this footpath is not heavily used, and as Uxbridge police station is within about 30 metres, it naturally gets a lot of police patrolling it, however with Uxbridge police being scheduled for closure within the next few years, there is potential for the existing issues to worsen, and this development will bring lots of people to the area who will be subjected to this potential crime. The Metropolitan Police are concerned that the increase in footfall will be enough to potentially put people at risk but not enough to provide enough natural surveillance and activity to significantly improve the area

Therefore the Metropolitan Police have requested that S106 money be secured to improve this area. At present the lighting is poor, it is positioned too low, lacks uniformity and is gloomy. It is recommended that this lighting is improved and that CCTV is installed that is actively monitored by the London Borough of Hillingdon CCTV department.

In addition to the above Uxbridge Police Station have been consulted on the proposed development and raised an objection to the application based on the impact of the development on security levels at the Police Station. The Metropolitan Police (Uxbridge Police Station) and the applicant have discussed the issue and have agreed that in order to

resolve the concern a 2.9m high wall along the boundary of the site with Uxbridge Police Station will be provided by the applicant. This would be secured through the s106 agreement if the application was to be approved.

7.12 Disabled access

The Council's Access Officer has reviewed the submitted details and provided comments on the application which were provided to the applicant. The applicant has provided additional information which has satisfied the Council Access Officer's previous concerns.

Subject to the attachment of conditions to any planning consent the proposed scheme is deemed to conform with London Plan 2016, Policy 3.8 (Housing Choice) and the Council's Supplementary Planning Document 'Accessible Hillingdon', adopted September 2017.

7.13 Provision of affordable & special needs housing

Policy H2 of the Local Plan: Part 1 - Strategic Policies (2012) seeks to deliver 35% of all new homes as affordable. Whilst the Council would usually seek to secure part of this as affordable ownership, Paragraph 64 of the NPPF (2018) outlines that build to rent should be exempt from this requirement. The Mayor's Affordable Housing and Viability SPG provides the relevant guidance regarding securing affordable housing on build to rent schemes, including how to implement a threshold approach to viability. Schemes that provide 35% affordable housing on site, without public subsidy, and meet the specified tenure mix are not required to submit viability information or be subject to a late stage review. However, the tenure mix requirement does not apply to Built Build to Rent schemes and the SPG states that this should be entirely discount market rent.

Where this 35% threshold is not achieved, the applicant must submit a financial viability assessment demonstrating why it is not viable to meet the policy requirements.

The applicant proposes 53 units which equals 20% of the total as Discount Market Rent (DMR) units (23% by habitable room) and have lodged a Financial Viability Appraisal which has been independently reviewed and the above proposed affordable housing provision is deemed the maximum that can be provided. Taking the above matters into account, the affordable housing offer is considered to be justified. The details of the provision of affordable housing would be secured under the S106 Legal Agreement that would include an appropriate review mechanism should the application be recommended for approval.

It should be noted that in the Greater London Authority (GLA) Stage 1 response, the Mayor objected to the level of Affordable Housing being proposed.

7.14 Trees, landscaping and Ecology

LANDSCAPING

Policy BE38 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) states that development proposals will be expected to retain and utilise topographical and landscape features of merit and provide new planting and landscaping wherever it is appropriate.

The Council's Landscape Architect has reviewed the submitted information and raised an objection to the proposals. Whilst there are no TPO or Conservation Area designations directly covering the site, the existing trees and lower shrub planting contribute to the character and appearance of the area and soften the interface between the commercial town centre and neighbouring residential zone. The submitted tree report, assessed 13 individual trees and groups which are on the site, or close enough to be influenced by it. According to the survey there are no 'A' grade trees on the site. There are trees rated 'B' however whose condition and value would normally merit retention. The remaining trees are category 'C' which do not pose a serious constraint on development.

An Arboricultural Impact Assessment confirms that trees will be retained as part of the development proposal, however all of these trees are located off-site on neighbouring land. The on-site trees will all be removed to facilitate the development, including two 'B' grade trees. A landscape strategy has been submitted, however the constraints and opportunities sections fail to acknowledge the on site 'B' grade trees. This is not acceptable without adequate mitigation measure and interventions, for example, an increase in the provision of street level trees and permeable space (above the existing quantum), to justify the loss, this has not been proposed.

The Council's Landscape Architect has objected to the proposed development because it has failed to retain the existing trees that are deemed worthy of protection or proposed any measures to mitigate against the loss of these landscape features of merit. In addition the level of soft landscaping proposed is deemed to be minimal and insufficient to mitigate the urbanising impact of the development of over 11 storeys in this location. The scheme therefore fails to satisfy saved policy BE38 of the Hillingdon Local Plan: Saved UDP Policies (November 2012).

7.15 Sustainable waste management

Local Plan Policy EM11 requires proposed development to address waste management at all stages of a development life. London Plan Policy 5.17 requires suitable waste and recycling facilities in all new developments. HDAS - New Residential Layouts provides further details on waste management to guide development proposals.

The Council's Waste Strategy Officer has assessed the submitted documentation and has raised objections to the proposals, stating that aspects of the proposed waste strategy are not considered to be acceptable. These were raised in previous objection comments and have not been adequately addressed. The following objections have been raised:

The swept path analysis fails to demonstrate that refuse vehicles can access and manoeuvre within the site. It highlights how tight the access is and the Council's Waste Strategy Officer has stated that they are not confident that the Council will be able to carry out scheduled collections. An objection is therefore raised to the proposals.

In addition the Council's Waste Strategy Officer has previously raised a concern about the proposed collection area for Block C. This concern remains as the collection point is immediately outside residential properties where 24 bins would cover around 34 metres of the pathway. This would most likely block access to enter / exit these properties and result in a detrimental impact on residential amenity. As such the proposed layout is not deemed to be acceptable.

For the reasons set out above the Council's Waste Strategy Officer has raised an objection to the application and the proposal is deemed contrary to Local Plan Policy EM11, London Plan Policy 5.17 and HDAS - New Residential Layouts.

7.16 Renewable energy / Sustainability

The Council's Sustainability Officer has reviewed the submitted details and held discussions with the applicant through the course of the application process. Despite the applicant providing additional information the Council's Sustainability Officer has retained an objection to the proposed development, stating that the energy strategy does not accord with relevant policies. The submitted energy strategy does not demonstrate sufficient attempts have been made to secure zero carbon development as required by Policy 5.2 of the London Plan (2016). The assessment shows a reduction of 35% in tCO₂ per annum, however this is the minimum requirement. Insufficient evidence has been presented as to why a greater degree of saving cannot be achieved on site. As a consequence, the

proposals would result in the need for a significant offsite contribution. Based on the energy assessment, this would be £542,070. This would only be acceptable provided there is clear justification as to why greater savings cannot be achieved on site.

Furthermore, the energy strategy states that "The design of the glazed areas will seek to offer good access to natural daylight to reduce consumption of energy for artificial lighting. Overall, a balance shall be sought between achieving day lighting levels and winter solar gains, whilst minimising summer heat gains and cooling loads." The designs attempt to maximise the site's capacity through multiple storey units. No daylight/sunlight assessment has been undertaken of the building itself; the submitted assessment only relates to the impact the development will have on other units. The design is such that some units will be shadowed for large parts of the day by large expanses of built form, particularly those at lower level and those that are single aspect; in these instances limited natural lighting will be achieved resulting in a higher lighting demand. At present there is a disconnect between what the energy strategy requires and what the designs are showing.

Within the Greater London Authority (GLA) Stage 1 response the Mayor has also objected to this element of the proposal.

Justification has not been provided as to why greater savings cannot be achieved on site and a s106 agreement has not been progressed to secure the necessary contribution to mitigate the impact of the development. Therefore the proposal is deemed contrary to Policy 5.2 of the London Plan (2016) and the application is recommended for refusal.

7.17 Flooding or Drainage Issues

Policies OE7 and OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding. The site falls outside any flood zones as defined in the Council's own Strategic Flood Risk Assessment (SFRA) and is within flood zone 1 on the Environment Agency maps. A flood risk assessment has been submitted with the application and modified following comments received from the Council's Flood and Water Management Officer. The scheme would need to demonstrate that it would incorporate sustainable drainage techniques and reduce the risk of flooding in accordance with the requirements of Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

The Council's Flood and Water Management Officer assessed the submitted documentation and has raised objections to the proposals, stating that aspects of the proposed surface water drainage strategy are not considered to be acceptable. These were raised in previous objection comments and have not been adequately addressed in the amended Flood Risk Assessment, nor the Drainage Strategy. The following objections have been raised:

1. Surface water discharge rate and location - The Flood Risk Assessment states that the proposed surface water drainage strategy is to discharge into the public sewer at a restricted runoff rate of 5l/s. Whilst the rate of runoff is deemed acceptable, it has been acknowledged in correspondence that the existing drainage connection does not discharge to a public sewer and further information has not been provided to suggest that this connection is legal and can be retained for the lifetime of the development. The current information is misleading and does not address the drainage constraints of the site. Additional information is required to demonstrate the continuation of this drainage network to a public sewer, including an indication of the capacity of the network and details of any historic discharge licences/agreements.

2. Blue/green landscaping - there are considerable opportunities within the landscaping strategy for the site that have not been taken in the current drainage strategy. It is critical that areas are safeguarded for landscaping and drainage at the planning stage in order that the appropriate scheme can be implemented. The Flood Risk Assessment discounts the possibility of utilising swales; however, there are multiple linear landscaping features within the development that can be used for conveyance and attenuation. In line with the London Borough of Hillingdon Sustainable Drainage Design and Evaluation Guide, the applicant should consider the proposed landscaping strategy and identify the opportunities for SuDS. The decision to utilise below ground pipes for conveyance at an early stage of design without consulting the landscaping strategy is not adequate justification for omitting blue/green infrastructure.

3. Infiltration drainage - Infiltration drainage is not proposed for the development. Even if the rate of infiltration is low, the purpose of more sustainable options than below ground tanks is that they provide wider multiple benefits such as water quality treatment and deal with surface water at source. Permeable paving should be used throughout the development to reduce the requirement for below-ground storage in addition to other partial infiltration measures.

4. Water reuse - Information has not been provided to demonstrate the proposed methods of water reuse and recycling within the site. The proposals should minimise water consumption and encourage rainwater harvesting where this is suitable. This is of particular importance for the water supply to the landscaping areas in the development.

Despite lengthy discussions between the Council's Flood and Water Management Officer and the applicant the above issues have not been resolved and the Council's Flood and Water Management Officer maintains an objection to the proposal as set out above. Within the Greater London Authority (GLA) Stage 1 response the Mayor has also objected to this element of the proposal.

The proposed drainage strategy fails to demonstrate that surface water run off is controlled to ensure the development does not increase the risk of flooding. This is contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.12 Flood Risk Management, Policy 5.13 Sustainable Drainage and Policy 5.15 Water use and Supplies of the London Plan (March 2016) and the National Planning Policy Framework.

7.18 Noise or Air Quality Issues

Noise

The Government's National Planning Policy Framework (NPPF) gives the Government's guidance on noise issues. Policy 7.15 of the London Plan (2016) seeks to reduce noise and minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

There is a potential for noise and vibration issues during the construction phase of the development and also for possible noise issues for the future end users of the development. The Council's Environmental Protection Unit have reviewed the submitted details and have commented that the design principles seem reasonable and practical and that issues around noise and vibration can be covered by way of condition. In light of this they have not raised an objection to the application but have suggested a number of conditions should the application be recommended for approval.

The Ministry of Defence: Defence Infrastructure Organisation raised an objection to the

development based on the time and date of the noise survey undertaken when RAF Northolt was not at its busiest period. However the applicant has provided a revised Ambient Noise Assessment (Ref. J001807/3048/ECE/03) which the DIO have confirmed is acceptable.

The proposed development is therefore deemed to accord with Policy 7.15 of the London Plan (2016) subject to these conditions being attached to any grant of planning consent.

Air Quality

The assessment has included the provision of air quality monitoring which has indicated there is no requirement for the provision of mechanical ventilation to protect future residents from the ingress of polluted air. The car parking associated with the proposed development is drastically reduced from current use therefore it is not anticipated, in the air quality assessment, that the operation will cause additional congestion on the highway. The submitted Travel Plan also indicates proposed targets for a 13% increase in the use of sustainable modes of transport.

The air quality neutral assessment indicates the development is within the benchmarks set for building and transport emissions. However, the proposed development is just within the Uxbridge Air Quality Focus Area and in these cases the Council require a calculation of the damage costs of the increased emissions associated with the development. The damage costs have been calculated as £29,049, however this is without the reductions in costs that would be applied from mitigation measures which reduce these emissions such as the high level of modal shift from the Travel Plan and any public realm enhancements in terms of increased facilities for cycling and walking. The Council's Air Quality Officer has discussed the scheme with the Council's Highways Engineer and is satisfied that the public realm improvements agreed with the applicant, along with the proposed Travel Plan, negate the requirement for an air quality contribution. The Council's Air Quality Officer has however requested conditions be attached to any grant of planning consent for the development. Subject to the attachment of these conditions the application is considered to accord with Policy 7.15 of the London Plan (2016).

7.19 Comments on Public Consultations

At the time of writing the report, overall, 228 letters or internet representations have been received objecting to and supporting the scheme.

The main issues raised in the objections are summarised in the 'External Consultee' section of this report. The issues raised are noted and have been addressed in the relevant sections of this committee report.

7.20 Planning obligations

Policy R17 of the Hillingdon UDP is concerned with securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. These saved UDP policies are supported by more specific supplementary planning guidance.

The Council's Section 106 Officer has reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impacts of the development. As the application is being recommended for refusal, no negotiations have been entered into with the developer in respect of these contributions. However, if the application were to be considered for approval, the following heads of terms would have been pursued:

1. Highways: in line with the SPD and depending upon the views of the highways engineer any and all highways works will be required to be met by the applicant, including s278 works.

2. Affordable Housing: In line with the SPD and current planning policy 35% of the scheme is required to be delivered as affordable housing with the tenure and mix to be agreed by the Council. In this case the applicant has demonstrated that 20% affordable housing can be delivered. However, a review mechanism has not been secured.

Built to Rent restrictive covenants in line with Greater London Authority SPG on Affordable Housing (2017)

3. Construction Training: Either a construction training scheme delivered during the construction phase of the development or a financial contribution.

4. Public Realm Contributions: a contribution of £361,500.

5. Contributions towards security measures on land adjacent to the site.

6. Agreement to secure a 2.9m high wall along the boundary with Uxbridge Police Station.

7. Carbon Off-set of £542,070.

8. Travel Plan plus £20,000 Bond

9. Parking Permit free development for all future residents

10. Project Management and Monitoring Fee.

No legal agreement to address these issue has been offered. As such, the proposal fails to comply with Policy R17 of the UDP and it is recommended the application should be refused.

Community Infrastructure Levy (CIL)

In addition to S106 contributions the Council has adopted its own Community Infrastructure Levy (CIL) with a charge of £95 per square metre of gross internal residential floor area and £35 per square metre of gross internal office floor area. This application is CIL liable with respect to new floorspace being created.

In addition to the London Borough of Hillingdon CIL, the Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £35 per square metre of gross internal floor area to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable with respect to new floorspace being created.

7.21 Expediency of enforcement action

There are no enforcement issues relating to this site.

7.22 Other Issues

There are no other issues related to this site.

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the

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

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

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

Planning Conditions

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

Planning Obligations

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

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable.

10. CONCLUSION

The proposed scheme is considered to be an over development of the site, resulting in an unacceptable level of density, a detrimental impact on heritage assets and the character of the locality, a detrimental impact on neighbouring residents, insufficient standard of living for future occupiers, unacceptable drainage strategy, waste arrangements, car parking provision and energy strategy. In addition the Ministry of Defence have raised an objection to the application based on the scheme's potential to impact on the safe functioning of radar equipment.

As such the proposed scheme fails to accord with policies contained within the Hillingdon Local Plan: Part 1- Strategic Policies (8th November 2012), Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), the London Plan 2016 and the National Planning Policy Framework (NPPF).

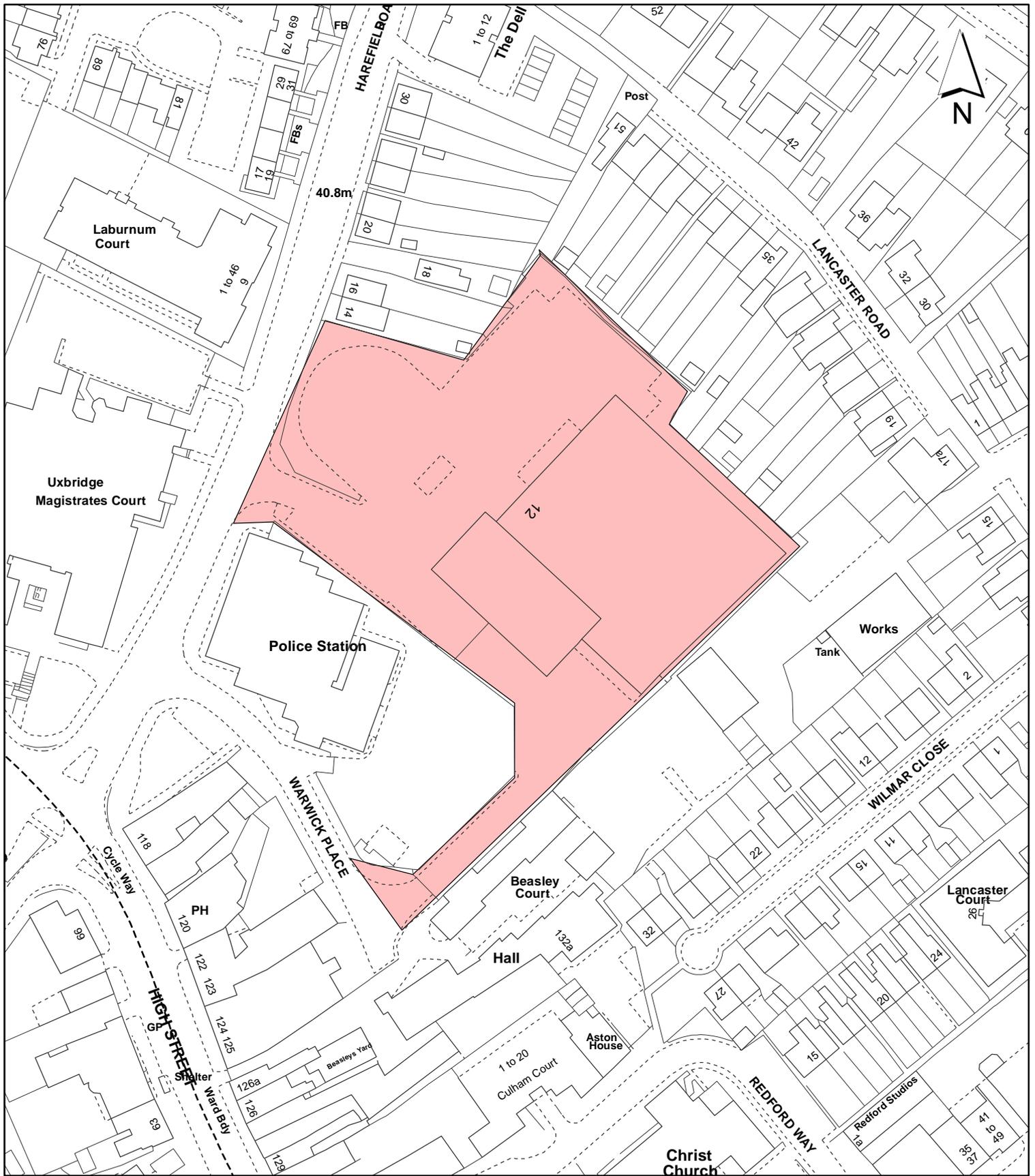
Refusal is therefore recommended.

11. Reference Documents

The Hillingdon Local Plan: Part 1- Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)
London Plan 2016
National Planning Policy Framework (NPPF) 2018
The Greater London Authority Sustainable Design and Construction (2006)
Council's Supplementary Planning Guidance - Community Safety by Design
Council's Supplementary Planning Document - Air Quality
Council's Supplementary Planning Document - Noise
Hillingdon Supplementary Planning Document: Accessible Hillingdon January (2010)
Air Safeguarding Circular 01/03
GLA Affordable Housing and Viability Supplementary Planning Guidance (SPG)
Emerging Hillingdon Local Plan: Part 2 Site Allocations and Designations
Emerging Hillingdon Local Plan: Part 2 Development Management Policies
Emerging Hillingdon Local Plan: Part 2 Policies Map
The Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002 (2016)
General Aviation Strategy March 2015

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Notes:

 Site boundary

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Site Address:

10-12 Harefield Road

Planning Application Ref:

16266/APP/2018/1849

Planning Committee:

Major

Scale:

1:1,250

Date:

February 2019

LONDON BOROUGH OF HILLINGDON
 Residents Services
 Planning Section

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