

Report of the Head of Planning, Transportation and Regeneration

- Address** FORMER MASTER BREWER SITE FREEZELAND WAY HILLINGDON
- Development:** Construction of a residential-led, mixed use development comprising buildings between 4 and 9 storeys to provide 437 residential units (Use Class C3); employment floor space (Use Classes B1(a-c)); flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking; and hard and soft landscaping, plant and other associated ancillary development.
- LBH Ref Nos:** 4266/APP/2017/3183
- Drawing Nos:** 5021 - 18.11.28 - Hillingdon Energy and Sustainability Statement Ver .
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Arboricultural Implications Assessment
Archaeological Desk-Based Assessment August 2017
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Cover Letter 30/11/18

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Date Plans Received: 01/09/2017

Date(s) of Amendment(s): 13/12/2018

Date Application Valid: 06/09/2017

01/09/2017

1. **SUMMARY**

Detailed planning permission is sought for a redevelopment on the former Master Brewer site, for the construction of a residential-led, mixed use development comprising buildings between 4 and 9 storeys, to provide 437 residential units (Use Class C3); 341 sq m of employment floor space (Use Classes B1(a-c)); 425 sq m of flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking; and hard and soft landscaping, plant and other associated ancillary development.

The original submission was lodged in August 2017 for 377 units. Amendments were subsequently submitted to the original scheme in March 2018 for 363 units and in August 2018 the scheme was amended again to provide 359 units. These two iterations have now been amended further and replaced with the November 2018 current scheme for 437 units.

1,627 local residents, businesses and local amenity groups were consulted. 129 individual letters or internet representations have been received to the 3 rounds of public consultations, objecting to the planning application, primarily on the grounds of increased traffic generation and traffic congestion at Hillingdon Circus and the surrounding road network and overdevelopment of the site. Issues relating to the scale of the development, urban design, air quality, lack of parking, flooding and impact on community facilities have also been raised. In addition, 20 letters of support have been received. The Ickenham and Oak Farm Residents Associations and the Ickenham Residents Forum have made representations, objecting on similar grounds to those made by individual residents.

Given the scale of the development, the application is referable to the Mayor of London.

Whilst no objection is raised to the principle of the proposed residential led mixed use scheme, it is considered that the size and scale of development is inconsistent with the scale and function of the existing Local Centre. The resultant built development would be out of keeping with the density, character and appearance of the area. In addition, the height and bulk of the proposed development will appear visually prominent, to the detriment of the open character of the adjoining Green Belt, whilst disabled access within the site is considered unsatisfactory.

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

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

The scheme fails to retain and utilise landscape features of merit (high value trees), which could selectively have been retained and incorporated within the new built environment. The scheme has also failed to satisfactorily address drainage and flood related issues. In addition, given the lack of detailed information and that the provision of a carbon off-set contribution has not currently been secured by way of a legal agreement, the development is not policy compliant, as it fails to satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions. Furthermore, it is considered that the application has failed to establish that the proposed residential units can be sited, designed, insulated or otherwise protected from external noise sources, to appropriate standards.

Since planning obligations have not currently been secured by way of a legal agreement, the development as it stands fails to satisfactorily address the issues relating to contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development, in respect of off site highways works, public transport, travel plans, construction training, ecological mitigation, affordable housing, air quality and project management and monitoring. The application is being recommended for refusal on this basis.

Refusal is recommended accordingly.

2. RECOMMENDATION

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

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

1 NON2 Non Standard reason for refusal Design

The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt and would mar the skyline, contrary to Policies BE1 and EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies OL3, OL5, OL26, BE13, BE19, BE21, BE26, BE38, OE1 and PR23 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policies DMHB 10, DMHB 11, DMHB 12, DMHB 14, DMHB 17, DMEI 6; Policies 7.4 and 7.6 of the London Plan, the Council's Supplementary Planning Guidance "Design Guide - Residential Layouts and House Design", emerging Policy SA 14 'Master Brewer and Hillingdon Circus' of the Local Plan: Part Two Site Allocations and Designations and the NPPF (2018).

2 NON2 Non Standard reason for refusal Parking

Car parking provision is insufficient to address the demands of the proposed development in this locality given the site's low public transport accessibility, contrary to Policy AM14 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012),

emerging Local Plan Part 2 Development Management Policy DMT 6 and the Council's Parking Standards.

3 NON2 Non Standard reason for refusal Traffic

The application fails to demonstrate that the proposal would not result in an unacceptable rise in traffic around the application site causing severe impacts to the free flow of traffic as well as to highway and pedestrian safety, contrary to Policy T1 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), policies AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policies DMT 1, DMT 2 and DMT 5; Policies 6.3, 6.11 and 6.12 of the London Plan (July 2016) and the National Planning Policy Framework (2018).

4 NON2 Non Standard reason for refusal Access

The proposed development by reason of its design, form and layout would fail to provide adequate access for future occupiers, particularly to the communal podium gardens and play areas, contrary to Policy BE1 of the Local Plan Part 1 - Strategic Policies (2012), emerging Local Plan Part 2 Development Management Policy DMHB 16, London Plan policies 3.1, 3.5 and 7.2 and the design principles contained within the adopted Hillingdon Design and Access Statements (HDAS): Residential Layouts and Accessible Hillingdon.

5 NON2 Non Standard reason for refusal Flood

In the absence of detailed flood risk assessment and drainage report, the application has failed to address the issues relating to flood risk and has failed to demonstrate that this development incorporates sustainable drainage techniques and reduce the risk of flooding. The proposal is therefore contrary to Policy EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies OE7 and OE8 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policy DMEI, Policies 5.12 and 5.13 of The London Plan (2016), the National Planning Policy Framework (2018) and the Planning Practice Guidance (March 2014).

6 NON2 Non Standard reason for refusal Energy

The development fails to satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions on site, contrary to policy EM1 of the Local Plan Part 1 - Strategic Policies (2012), emerging Local Plan Part 2 Development Management Policies DMEI and DMEI 2, Policies 5.2, 5.13 and 5.15 of the London Plan, and the NPPF (2018).

7 NON2 Non Standard reason for refusal Trees

The development fails to retain and utilise landscape features of merit (high value trees), which could selectively have been retained and incorporated within the new built environment. This is contrary to policy BE1 of the Local Plan Part 1 - Strategic Policies (2012), emerging Part 2 Development Management Policy DMHB 14 and Policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

8 NON2 Non Standard reason for refusal Noise

In the absence of a comprehensive noise report, the applicant has failed to demonstrate that the proposed residential units can be sited, designed, insulated or otherwise protected from external noise sources to appropriate national and local standards. The proposal is therefore contrary to Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policies OE1 and OE3 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

9 NON2 Non Standard reason for refusal

The proposed development fails to provide adequate refuse and recycling facilities for the residential element of the scheme, contrary to Policy EM11 of the Local Plan Part 1 (2012) and Policy 5.16 'Waste Net Self Sufficiency' of the London Plan (2016).

10 NON2 Non Standard reason for refusal Planning Obligations

The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Off site Highways Works, Public Transport, Travel Plans, Construction Training, Ecological Mitigation, Affordable Housing, Air Quality and Project Management and Monitoring). The scheme therefore conflicts with adopted policies T1, T2, E7, EM7, EM8 and H2 of the Local Plan Part 1 - Strategic Policies (2012), Saved policies AM15, AM2, AM7, OE78, OE7, BE38, EC2, EC3, EC5, EC6 and R17 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policies DMH 7, DMEI 7, DMEI 14, DMCI 3, DMCI 7, DMT 1, DMT 2, DMT 4, and DMT 5; Policies 3.11, 3.12, 3.13, 6.2, 6.4, 7.1, 7.19 and 8.2 of the London Plan (2016), the adopted Supplementary Planning Document 'Planning Obligations; emerging Policy SA 14 'Master Brewer and Hillingdon Circus' of the Local Plan: Part Two Site Allocations and Designations and the NPPF (2018).

INFORMATIVES

1

You are advised that had the Local Planning Authority not refused the application for the above reasons it would have required that further archaeological works be undertaken in accordance with advice received from the Greater London Archaeological Advisory Service, and had the development been considered acceptable in other regards, the Local Planning Authority would have imposed conditions to prevent development occurring until appropriate archaeological investigations had been undertaken.

2

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

3

The Local Planning Authority has taken into consideration the requirements of the National Planning Policy Framework and has worked pro-actively with the applicant through extensive negotiations to address material planning issues wherever possible. We have made available detailed advice in the form of our statutory policies from the 'Saved' UDP 2012, Local Plan Part 1, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service. Notwithstanding these discussions, the scheme was ultimately considered to fail to comply with the development plan for the reasons identified above.

4

The application is within a Focus Area and like other major planning applications, the Local Planning Authority requires that proposals are air quality positive, contributing to reduce emissions / exposure from hazardous levels of pollution and enabling the Local

Planning Authority to fulfil its LAQM duties. The proposal brings into the area additional 338 trips daily, creating additional 665 kg NOx per annum, which is prejudicing the Local Planning Authority efforts to clean up the area. Therefore a S106 contribution of £247,906 is required using 2015 NOx damage prices.

5 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).

6 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.

- AM1 Developments which serve or draw upon more than a walking distance based catchment area - public transport accessibility and capacity considerations
- AM10 Incorporation in new developments of additions to the proposed cycle network
- AM11 Improvement in facilities and promotion of safety and security at bus and rail interchanges; use of planning agreements to secure improvement in public transport services
- 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
- AM3 Proposals for new roads or widening of existing roads
- 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
- BE13 New development must harmonise with the existing street scene.
- 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.
BE26	Town centres - design, layout and landscaping of new buildings
BE28	Shop fronts - design and materials
BE29	Advertisement displays on business premises
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE36	Proposals for high buildings/structures in identified sensitive areas
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE39	Protection of trees and woodland - tree preservation orders
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
H4	Mix of housing units
H5	Dwellings suitable for large families
LE6	Major office and other business proposals in town centres
OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE3	Buildings or uses likely to cause noise annoyance - mitigation 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
OL5	Development proposals adjacent to the Green Belt
PR23	Hillingdon Circus
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
R2	Provision of recreation, entertainment and leisure facilities in Town Centres
LPP 2.15	(2016) Town Centres
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.11	(2016) Affordable housing targets
LPP 3.12	(2016) Negotiating affordable housing on individual private residential and mixed-use schemes
LPP 3.13	(2016) Affordable housing thresholds
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.6	(2016) Children and young people's play and informal recreation facilities
LPP 3.7	(2016) Large residential developments
LPP 3.8	(2016) Housing Choice

LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.12	(2016) Improving opportunities for all
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.7	(2016) Renewable energy
LPP 6.10	(2016) Walking
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.13	(2016) Parking
LPP 6.2	(2016) Providing public transport capacity and safeguarding land for transport
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.4	(2016) Enhancing London's Transport Connectivity
LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport

7 159 Councils Local Plan : Part 1 - Strategic Policies

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant saved policies (referred to as policies from the Hillingdon Unitary Development Plan - Saved Policies September 2007), then London Plan Policies (2016). On the 8th November 2012 Hillingdon's Full Council agreed the adoption of the Councils Local Plan: Part 1 - Strategic Policies. Appendix 5 of this explains which saved policies from the old Unitary Development (which was subject to a direction from Secretary of State in September 2007 agreeing that the policies were 'saved') still apply for development control decisions.

8 174 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 application site area measures approximately 2.48 ha and is located within the North Hillingdon Local Centre. The site was formerly occupied by the Master Brewer Motel, a public house/motel with 106 bedrooms, conferencing and restaurant facilities and 200 parking spaces. Following demolition of the Motel and associated buildings, the site is currently derelict and awaiting redevelopment.

Currently, the Master Brewer site comprises hard standing and semi mature vegetation. Semi-mature and mature boundary planting envelope the site on each of its boundaries. Vehicular access to the site is provided via an entrance/exit point onto Freezeland Way, which has been blocked with temporary concrete bollards and fencing.

The site is broadly flat but inclines at its boundary adjacent to Long Lane (approximately 2.5 metres) and declines to the embankment adjacent to the A40 (approximately 3 metres).

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

To the south of the site is Council land fronting Freezeland Way and beyond this, 2 storey residential properties and the North Hillingdon Local Centre. Green Belt land is located to the east of the site. The A40 Western Avenue forms the northern boundary of the site.

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

The wider built environment is characterised by predominantly 2/3 storey detached and semi detached residential and commercial properties.

3.2 Proposed Scheme

A full planning application has been submitted for the construction of a residential-led, mixed use development, comprising buildings between four and nine storeys, to provide 437 residential units (Use Class C3); employment floor space (Use Classes B1(a-c)); flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking, hard and soft landscaping, plant and other associated ancillary development. The proposal

includes the creation of a linear park, which will form a publicly accessible route through the development to the adjacent Green Belt.

Commercial

Non-residential uses are focused to the south west corner of the site at ground floor level with residential uses above. The commercial accommodation comprises:

- 2 no. retail units, proposed with a flexible use class to enable A1 and/or A3 uses (425 m²). The retail uses are proposed at the entrance to the site (within Building 1)
- 4no. affordable workspace units, proposed with a flexible use class to enable B1 (a - Offices), B1(b - Research and development) or B1(c - Light industry appropriate in a residential area) to be accommodated on site (341 m²).

A cycle hub/workshop/cafe is also proposed (within Building 3), to support residents and the existing community and promote sustainable travel.

Residential

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

Unit Types	Number of Units	Percentage Mix (%)	Percentage Mix (%)
1 bed 2 person	190	43.5%	43.5%
2 bed 3 person	91	20.8%	40.5% (2 bed total)
2 bed 4 person	86	9.7%	
3 bed 5 person	70	16%	16%

The current unit mix has been amended during the course of the application from the following original unit mix:

- 1 bed 2 person x 97 (26%)
- 2 bed 3 person x 64 (17%)
- 2 bed 4 person x 141 (37%)
- 3 bed 5 person x 75 (20%)

The proposal will provide 10% wheelchair accessible units.

The proposed buildings vary in height from 4 storeys to 9 storeys. The tallest buildings are positioned to the front and rear of the site along the site's north west and south west boundary, adjacent to Long Lane and comprise 8 and 9 storey buildings respectively. These buildings, along with those proposed along the northern and western boundary, are positioned to provide a perimeter block arrangement. The applicant explains that these perimeter buildings are proposed as continuous built volumes, to protect the site from road noise and pollution from Long Lane and the A40. The continuous volumes are articulated with alternating heights and facade alignments.

Building 1

Building 1 is situated at the south west corner and entrance of the site and is part 6, part 8 storeys in height. The building has been designed as a hinge block, fronting onto both Long Lane and Freezeland Way. The building fronts onto the new entrance gateway and its

height the applicant submits, enables it to act as a landmark building within North Hillingdon Local Centre, guiding pedestrians into the site. Building 1 will provide 41 private residential flats from first to seventh floor. Non-residential uses are proposed at ground floor, incorporating flexible commercial uses.

Buildings 2 and 3

Buildings 2 and 3 line the main route into the site accommodating 5 and 7 storeys of accommodation respectively. Works space is provided on the ground floors of both blocks. The main facade material is brick, with inset balconies open onto the street elevations. 26 and 30 dwellings will be provided within each building respectively.

Building 4

Building 4 is located at the north west corner of the site, where the site boundary rises to a steep embankment (where Long Lane crosses the A40 Western Avenue). The change in levels at this point of the site means that the lower section the proposed building will not be visible from street views. The building comprises of 9 storeys and will contain 68 dwellings.

Buildings 5, 6 and 7

Buildings 5 and 6 are identical containing 7 storeys of accommodation and providing 53 dwellings each. Building 7, which faces the Green Belt is 5 storeys and contains 37 dwellings. All three buildings are clad in brick and feature south-facing balconies.

Buildings 8, 9, 10, 11 and 12

The Residential Pavilion Buildings comprise Block 8 at 6/7 storeys, Block 9 at 6 storeys, Block 10 at 5/6 storeys, and Block 11 at 6 storeys. A total of 103 units are provided within these blocks.

Each of the pavilion buildings are now proposed above a semi-basement, podium car park, which contains a significant proportion of the car parking capacity within the site. The enclosed car park will form a landscape podium deck, punctuated by the 5 central buildings. Access to these buildings is proposed at street and podium level to facilitate accessible entrances to these spaces and buildings.

A number of updates have been made to the central pavilion buildings as part of the design review resulting in minor revisions to the number and mix of units within each block. Building 8 contains a cycle workshop ('the Cycle Hub'), fronting the proposed urban square. These buildings range between 5 and 7 storeys in height, reducing in scale towards the Green Belt to the east.

Parking

In total, 219 residential parking spaces are proposed, 34 of which are designated blue badge bays. A further 9 bays are provided for visitors, users of the commercial spaces and a car club. Parking for 876 bicycles has been provided in secure and covered stores, either within the proposed buildings or as accessible stores.

The public realm has been modified to reduce the amount of surface level car parking, in line with an overall reduction in car parking spaces. The bulk of on-site car parking is provided by a parking strip along the western edge of the site, screened by planting from

Long Lane. This area is accessed via a left-hand turn between Buildings 1 and 2. This parking area has been rationalised, with the number of continuous parking bays limited to 7, interspersed with planting.

Additional car parking capacity is also provided within the semi-basement car park situated beneath the 5 pavillion buildings, enclosed within a landscaped podium deck. This parking area is accessed via a ramp in the southwest corner of the podium.

Further on-street parking has been integrated within the design of the landscaping scheme to provide access/drop-off to buildings and to cater for visitors.

Landscaping and amenity

A landscaping scheme has been prepared, which is defined in part by several character areas. The scheme proposes the inclusion of a semi-basement car park and podium deck. At podium level, there is an allocation for both public and private amenity spaces. The latter are accessed from the appropriate apartment blocks. The publicly accessible area also incorporates both formal and informal play facilities. The edge of the podium will be softened by formal hedge and shrub planting within raised planters.

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

- Statutory Services report Date: August 2017 Ref: 5021/03;
- Consultation Statement;
- Bird Hazard Management Plan (Ref: 103850EC1R0 dated 12 June 2017);
- Tree Constraints (BMD.15.052.DR.901 P1) Survey;
- Arboricultural Implications Assessment Revision P1;
- Arboricultural Impact Plan (BMD.DRG.14.052.902 P1);
- Preliminary Waste Classification Report ; and
- Preliminary Risk Assessment (17-0420.01 V2 dated August 2017)
- Transport Assessment Addendum Note (dated 27.11.18) ;
- Stage 2 Design Report For Mechanical Electrical & PH Services Date: Nov 18 V4c(minor update to reflect revised proposal);
- Ventilation Strategy Statement dated November 2018 - V4c (minor update to reflect revised proposal);
- Air Quality Assessment Rev B (dated 28.11.2018);
- Acoustic Assessment Rev 4 (dated 28.11.2018);
- Townscape and Visual Impact Assessment (TVIA)
- Flood Risk Assessment/Surface Water Management (dated 29.11.18);
- Affordable Housing Statement (November 2018);
- Archaeological Desk-Based Assessment (Ref: 23887 dated August 2017) (minor update to reflect revised proposal);
- Energy and Sustainability Statement (LN/5021/17Version 4 28.11.2018);
- Daylight and Sunlight Assessment;
- Heritage Opinion prepared by Montagu Evans;
- Preliminary Ecological Appraisal Revision P1 ;
- Ecological Plan (Phase 1 Habitat Survey);
- Financial Viability Assessment

3.3 Relevant Planning History

Comment on Relevant Planning History

- Hillingdon Council resolved to grant full and outline consents on 27 August 2014 for: A detailed application Ref: 4266/APP/2014/518 for a retail-led, mixed-use redevelopment of the site, comprising a 3,543 sq.m. (GIA)/2,182 sq.m.(net) foodstore, with 179 car and 32

cycle parking spaces (class A1); three additional retail units totalling 1,037sq.m. (Use Classes A1 to A5); a 100 sq.m. 'Safer Neighbourhoods' unit; a 70-bedroom hotel comprising six storeys plus plant level, 18 car parking and 16 cycle spaces; with associated highway alterations and landscaping and

- An outline application (Ref:4266/APP/2014/519) for 125 residential units, with 100 car parking spaces, 138 cycle parking spaces, associated highway alterations and landscape improvements. The application included 15% affordable housing by unit.

It should be noted that the Section 106 agreement was never completed by the applicant in connection with these applications. Therefore these schemes cannot be considered as 'extant consents' in relation to redevelopment of the site.

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

- Outline Planning application ref: 4266/APP/2012/1545 for Erection of 5 part 4, part 5 storey blocks to provide 125 residential units (Use Class C3) with 99 car parking spaces and 150 cycle parking spaces and associated highways alterations, together with associated landscaping;

Refused for the following reasons:

1. Highways - Individual

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

2. Development in Isolation - Individual

The proposal, if implemented in isolation would not bring forward the regenerative benefits (including job creation and improvements to the vitality and viability of the Hillingdon Local Centre) .

3. Planning Obligations - Individual

The applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development

4. Traffic/Highways - Cumulative

The application has failed to demonstrate that in the event that the proposed development (i.e. ref: 4266/APP/2012/1545) was to be granted planning permission alongside the other Spennill proposal on the site of the Former Master Brewer Hotel (i.e. ref: 4266/APP/2012/1544) and/or the development on the site at Land Adjacent to Hillingdon Station & Swallow Inn Long Lane (i.e. ref: 3049/APP/2012/1352), that the cumulative traffic impacts would not be severe in terms of congestion on the highway network, significantly detrimental to free flow of traffic, highway and pedestrian safety.

5. Air Quality - Cumulative

The application has failed to demonstrate that in the event that the proposed development (i.e. ref: 4266/APP/2012/1545) was to be granted planning permission alongside the other Spennill proposal on the site of the Former Master Brewer Hotel (i.e. ref: 4266/APP/2012/1544) and/or the development on the site at Land Adjacent to Hillingdon Station & Swallow Inn Long Lane (i.e. ref: 3049/APP/2012/1352), that the cumulative air quality impacts of the developments would not be unacceptable.

6. Comparative

There would be an unacceptable cumulative impact if the proposed development (i.e. ref: 4266/APP/2012/1545) was to be granted planning permission alongside the other Spenhill proposal on the site of the Former Master Brewer Hotel (i.e. ref: 4266/APP/2012/1544) and / or the development on the site at Land Adjacent to Hillingdon Station & Swallow Inn Long Lane (i.e. ref: 3049/APP/2012/1352).

The following applications were submitted on 08-08-2011 but were never determined.

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

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

2004 - outline application (reference; 4266/APP/2004/2715) was submitted for the redevelopment of the site to provide a comprehensive mixed use scheme comprising class A1 food store (8,819m²), 4 retail units (805m²) and retail parking for 538 vehicles, plus 220 residential units including affordable housing and parking for 230 vehicles, highway alterations to Long Lane and Freezeland Way including new access to the site off Freezeland Way (involving demolition of the Master Brewer Motel). The application was refused on 23 December 2004 for a total of 12 reasons which are summarised as follows;

- The impact of the proposed foodstore on the vitality and viability of North Hillingdon Local centre.
- The overdevelopment of the site and adverse impact on the existing street scene and openness and visual amenity of the adjacent Green Belt.
- Inadequate housing provision for persons with disabilities.
- Inadequate cycling facilities.
- Insufficient provision towards affordable housing, education, health, community facilities, leisure facilities, public transport, town centre and environmental/public open space improvements.
- Creation of a poor residential environment by virtue of the proximity to the A40 and overlooking to the roof servicing areas in terms of noise and outlook.
- Inadequate provision towards the storage of refuse and recyclables.
- Inadequate provision towards affordable family units.
- Failure to provide sufficient supporting evidence of trip generation associated with the proposed development.
- Failure to make provision towards energy efficiency measures and renewable energy technology and the associated impact on air quality (2 reasons); and
- Inadequate provision towards amenity space for residential occupants

2005 - duplicate applications in outline form (Reference: 4266/APP/2005/2978 & 4266/APP/2005/2979) were submitted for the erection of a Spenhill superstore (7,673 m²), 1,244m² of additional space for A1, A2, A3, A4 or D1 uses within the Use Classes Order, Car parking for 409 cars, 205 residential apartments, including affordable housing, together With 205 car parking spaces, highway alterations and landscaping and the demolition of the Master Brewer Hotel. Application 4266/APP/2005/2978 was refused on 14/6/2006 for the following reasons:

- The detrimental impact of the proposed foodstore on the borough's retail hierarchy
 - The overdevelopment of the site and adverse impact on the existing street scene and openness and visual amenity of the adjacent Green Belt by virtue of the overall scale, density, site coverage and lack of landscape screening (subsequently dropped at inquiry).
 - Insufficient provision towards town centre and environmental/public open space improvements and recycling and community safety.
 - Failure to demonstrate that the arising traffic generation can be adequately accommodated within the adjoining highway network; and
 - The cumulative impact of the proposals in the event the adjacent IKEA site was granted planning permission (subsequently dropped at inquiry).
- Duplicate application 4266/APP/2005/2979 was the subject of an appeal for Non determination. The Council subsequently resolved that if they had the power to do so the application would have been refused for the above-mentioned reasons. It should be noted that during the inquiry process the Council's reasons for refusing the application in respect of Green Belt and cumulative impact were removed. The appeal was subsequently withdrawn in January 2007.

Current Application

The application originally sought planning permission for a residential-led, mixed-use development comprising buildings between 4 and 9 storeys to provide 377 residential units (Use Class C3); employment floor space (Use Classes B1(a-c)); flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking, hard and soft landscaping, plant and other associated ancillary development.

A review of design was undertaken by the applicant to respond to post-submission officer observations. The review also followed the completion of an independent design review of the scheme and officer comments. An initial scheme revision was submitted to the Council for consideration in March 2018 in response to the comments received.

A subsequent revision to the scheme was then submitted to the LPA in August 2018. However, following on-going discussions with officers of the Local Planning Authority (LPA) and the Greater London Authority (GLA), the August 2018 scheme revision has subsequently been withdrawn from consideration by the applicant. In light of the withdrawal of this amendment, a revised scheme (November 2018) has been submitted. The revised scheme proposes an increase in the number of units originally proposed from 377 to 437 and a reduction in parking ratio to 0.5 spaces per units. The proposed revision also provides a central podium with semi basement parking and an increased amenity and landscape offer.

4. Planning Policies and Standards

UDP / LDF Designation and London Plan

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

Part 1 Policies:

PT1.BE1 (2012) Built Environment

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

Part 2 Policies:

AM1	Developments which serve or draw upon more than a walking distance based catchment area - public transport accessibility and capacity considerations
AM10	Incorporation in new developments of additions to the proposed cycle network
AM11	Improvement in facilities and promotion of safety and security at bus and rail interchanges; use of planning agreements to secure improvement in public transport services
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
AM3	Proposals for new roads or widening of existing roads
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
BE13	New development must harmonise with the existing street scene.
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.
BE26	Town centres - design, layout and landscaping of new buildings
BE28	Shop fronts - design and materials
BE29	Advertisement displays on business premises
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE36	Proposals for high buildings/structures in identified sensitive areas
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE39	Protection of trees and woodland - tree preservation orders
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
H4	Mix of housing units
H5	Dwellings suitable for large families
LE6	Major officer and other business proposals in town centres
OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE3	Buildings or uses likely to cause noise annoyance - mitigation 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
OL5	Development proposals adjacent to the Green Belt
PR23	Hillingdon Circus
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
R2	Provision of recreation, entertainment and leisure facilities in Town Centres
LPP 2.15	(2016) Town Centres
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.11	(2016) Affordable housing targets
LPP 3.12	(2016) Negotiating affordable housing on individual private residential and mixed-use schemes
LPP 3.13	(2016) Affordable housing thresholds
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments

LPP 3.6	(2016) Children and young people's play and informal recreation facilities
LPP 3.7	(2016) Large residential developments
LPP 3.8	(2016) Housing Choice
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.12	(2016) Improving opportunities for all
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.7	(2016) Renewable energy
LPP 6.10	(2016) Walking
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.13	(2016) Parking
LPP 6.2	(2016) Providing public transport capacity and safeguarding land for transport
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.4	(2016) Enhancing London's Transport Connectivity
LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **3rd October 2017**

5.2 Site Notice Expiry Date:- **3rd October 2017**

6. Consultations

External Consultees

The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015 as a Major Development. 1,676 surrounding property owners/occupiers have been consulted. At the time of writing the report, 129 representations have been received objecting on the following grounds:

- Increased traffic to the area
- The development is too large for area.
- This site is below a flight path
- There is not enough parking space allocated
- No family homes
- No GP, dental, school, parking area or playing area for children
- This proposal will degrade this area increase risk of traffic accidents due to the proposals
- Increasing noise and air pollution
- This planned development of the Master Brewer site will cause added traffic chaos on the A40 and slip roads leading to Hillingdon Circus.
- Already daily traffic jams in Long Lane and adjoining streets off Long Lane
- Traffic noise and airpollution will result
- The planned development is far too expansive.
- It will have a deleterious effect on the local area and spoil the skyline
- Gross over development which the transport infrastructure cannot accommodate and gridlock will result
- High rise blocks will totally dominate the area
- The number of resident units with insufficient car parking places unacceptable
- Where will the residents park?
 - The proposed development will be harmful to the local businesses and environment, and cause further congestion in an area already overloaded with traffic, damaging amenity for local residents as well as travellers in general
- We do not need social housing in this location
 - Object to the plans due to the sheer weight of traffic and pollution it will cause, together with strain on community resources like Doctors and Dentists
- The access to and from the site is still via Long Lane
- Anything encouraging large traffic flows should be stopped
- Buildings of more than 2 storeys are out of character with the area and would dominate the skyline
- The density of the development is too great
- Having such high blocks will not improve the landscape, even if the level of the development begins at a lower point than the neighbouring roads
- Too many cycle spaces
- Access to the site from the East on Freezeland Way looks like an accident waiting to happen
- The visual appearance is uninspiring and lacking in character
- Excessive in the context of an already heavily populated area and congested area
- The height of the blocks seems some what out of character for that piece of land, the shops on the other corner being only 2 or 3 storeys
- More residents more strain on local amenities such as schooling and doctors surgeries
- The residential blocks are too high and are visually intrusive. They are much larger than the

buildings in the surrounding area and would be overbearing

- The schools are oversubscribed already and it would move the boundary for those who currently qualify for Ickenham schools, potentially preventing places being allocated to Hillingdon residences
- The GP surgeries are already at the maximum and extra pressure added would not be acceptable
- The area is already too densely populated
- The height of the proposed development exceeds that of the buildings formerly present
- The proposed alterations to the highways, specifically access to and from the proposed development, will have an adverse effect on road safety
- The majority of units will have one if not two cars which will mean a lot more street parking in the area
- The plan is too ambitious and does not really support community needs
- Unsuitable location for residential units given its close proximity to both the A40 and RAF Northolt
- The TVIA is misleading. The wire line views do not include plant. There are technical errors with the scale. The views in winter will be greater because the trees are deciduous. The visual impact analysis has not been updated to reflect the most recent changes to the application

A Ward Councillor and the local Member of Parliament have also raised objections to the scheme.

In addition, 22 letters of support have been received, the contents of which are summarised below.

- The improvements to the design have gone as far as possible towards allaying concerns.
- Additional traffic is inevitable
- This is the best plan to have emerged and I would now support it, having been against earlier submissions.
- The site is currently an eyesore and desperately needs to be put to good use.
- I am worried about more traffic but we need the houses.

The above comments include responses received following further consultations undertaken in September and December 2018, upon receipt of revisions to the scheme. The comments received to both consultations have not been reproduced separately, given that the recommendation is for refusal and the number of objections. The latest consultation in December 2018 generated 37 responses (35 against and 2 in support). These latest representations reflect previous concerns / comments raised by respondents.

GREATER LONDON AUTHORITY (GLA)

(Officer note: The following Stage 1 report does not take into account further revisions to the scheme submitted in December 2018).

On 30 October 2017, the Mayor advised Hillingdon Council that whilst the residential-led mixed use redevelopment of the site is supported in principle, strategic issues with regards to employment, housing and affordable housing, urban design, heritage, inclusive design, climate change and transport must be addressed for the scheme to be compliant with the London Plan.

On 05 September 2018, Hillingdon Council notified the GLA that amendments had been made to the scheme and the applicant was now proposing redevelopment to deliver a residential led mixed use development comprising buildings between four and seven storeys to provide 359 residential units and 674 sq.m. of commercial floorspace. The Mayor subsequently issued a revised Stage 1 report (summarised below) to address the elements of the revised scheme (specifically housing delivery, including affordable housing, design and transport) that do not meet London Plan Policy and address policy changes since the original stage 1 response specifically the draft London Plan and the revised NPPF).

STAGE 1 Report (Summary - October 2018)

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 145 of the Stage 1 Report but that the possible remedies set out in that paragraph could address those deficiencies.

London Plan policies on employment, housing and affordable housing, urban design, heritage, inclusive design, climate change and transport are relevant to this application. The application does not comply with the London Plan and the following matters must be addressed:

- Principle of development: The principle of the comprehensive redevelopment of this brownfield site to provide 377 residential units, retail and affordable employment space is supported. The affordable workspace must be secured.
- Affordable housing: 20% affordable housing by unit is wholly unacceptable. No detail of tenure or mix has been provided which is fundamental to establishing the acceptability of the offer and/or the starting point for negotiation. The absence of this detail is unacceptable. The high-density residential-led redevelopment of a vacant low-value site must provide more affordable housing. The applicant's viability assessment will be rigorously scrutinised. An early stage review will be required and, if after further interrogation the maximum level of affordable provision is still below 35%, a late stage review will also be required. The Council must publish the financial viability assessment in accordance with the Mayor's Affordable Housing and Viability SPG.
- Urban design: Given the scale of development, key details should be secured as part of any permission to ensure an exemplary build quality is delivered. The applicant should review on street car parking provision and the relationship of the residential units to the A40. Playspace should be provided in accordance with the Play and Informal Recreation SPG.
- Climate change: Further information is required on cooling and overheating required.
- Transport: Further discussion is required regarding the highways impact. Conditions and s106 obligations and a £375,000 contribution to buses are required.

(Officer Comment: The December 2018 revisions take on board the GLA comments by increasing residential accommodation, providing 35% affordable housing and reducing car parking on-site).

MINISTRY OF DEFENCE (MOD)

The applicant is seeking full planning permission for the above proposed development at the former Master Brewer site in Hillingdon. The proposals include both residential and retail units as well as amenity areas. The application site (centre point) is approx. 2.14 km west of the centre of the runway at RAF Northolt and occupies the statutory height, birdstrike and technical safeguarding zones surrounding the aerodrome.

Aerodrome heights

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

This development site sits beneath a piece of protected airspace called the transitional surface and beneath the approach and take off climb for RAF Northolt. The approach, take off and transitional surfaces need to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

We have made safeguarding assessments based on the grid references on the four corners and centre of the proposed development site and have determined the maximum build heights for those areas as follows:

Centre: 507771, 184912: max build height = 30.9m

Corner 1: 507745, 184999: (where the tallest structure proposed will be approx. 29.5m) max build

height = 43.7m

Corner 2: 507874, 184949: max build height = 36.3m

Corner 3: 507828, 184854: max build height = 24.1m

Corner 4: 507674, 184858: max build height = 31.6m

The MOD therefore have no safeguarding objections regarding the building heights within the application site, providing they do not exceed the maximum build heights as indicated above.

Technical

The proposed development is also within the area protecting the operation of the Instrumental Landing System (ILS) and the Precision Approach Radar (PAR) that surveys the approach to the main runway at RAF Northolt. The site of the proposed development occupies statutory height safeguarding zones that serve to ensure air traffic approaches and the line of sight of transmitter / receivers navigational aids are not impeded. The proposed plans do not cause any technical safeguarding concerns.

Birdstrike

Within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome. The application site is also within the birdstrike safeguarding zone. The design drawings show there are proposals for green roofs on top of some of the buildings. The roofs, depending on the design, have the potential to attract and support nesting, hazardous birds such as gulls and other bird species. Therefore the MOD has concerns that this has the potential to increase birdstrike risk to air traffic using RAF Northolt.

The applicant has submitted a Bird Hazard Management Plan (BHMP), compiled by BMD Ltd. After reviewing the BHMP, we can confirm the document is thorough and robust and should ensure that any hazardous birds utilising the site are controlled in an appropriate and timely manner.

However, we request that points 3 and 6:

"Any birds found nesting and/or roosting and/or loafing during the breeding season will be dispersed when detected and/or when requested by relevant third parties e.g. the Local Planning Authority" be amended to include RAF Northolt as a relevant third party.

Cranes

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

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

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority 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.

Subject to the above design requirements being implemented as part of any planning permission granted, the MOD maintains no safeguarding objection to this application. I would be grateful if you could confirm receipt of this letter and confirm that a relevant condition covering the MOD's requirements is included in any consent granted.

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

Further comments on revised scheme (August 2018)

Having reviewed the plans for this application, I can confirm the MOD response remains extant as previously submitted for application 4266/APP/2017/3183 in our letter dated 21 September 2017.

ICKENHAM NEIGHBOURHOOD FORUM

The Ickenham Neighbourhood Forum was designated by the London Borough of Hillingdon in December 2016 to write a neighbourhood plan for Ickenham. The Ickenham neighbourhood area was designated at the same time and includes the former Master Brewer site. Following designation, the Forum successfully applied for consultancy support to create a community masterplan (to incorporate into the neighbourhood plan) for the former Master Brewer site and the site opposite. In the context of existing and emerging site-specific development plan policies, we established a clear community vision for the area through two community workshops attended by representatives of several local groups. We then published the community masterplan online for comment on 18 October 2017. In line with national planning policy (NPPF para 216) we expect the Council to give weight to our masterplan when deciding this application.

After studying the Master Brewer application (4266/APP/2017/318), we believe the proposals are fundamentally flawed in several areas and request that the Council refuse permission. The Council can refuse permission safe in the knowledge that a more sustainable, policy-compliant scheme drawn up by the local community is ready and waiting. Local groups are keen to work with GL Hearn in 2018 to implement the community masterplan, which we hope will be a development plan document in summer 2018 after our neighbourhood plan has passed referendum.

Grounds for refusal

- Over-development. At 8-9 stories, the proposed development would be entirely out of place and would dwarf the surrounding area, which typically consists of 2 storey homes 2-3 storey shops/flats built in a clearly residential style. (For reference: community masterplan has a maximum of 5 stories).
- Density. The proposed development squeezes 377 flats onto the site with a paltry amount of public space. No homes will have a second communal room, and the proposal fails to realise the opportunity to open up the green space to the east for public use. (For reference community masterplan aims to deliver current GLA density target for the site of around 220 homes, has a mix of flats and houses, and opens up Freezeland Covert for public benefit).
- Provisional of affordable housing. The application makes no mention of the number of affordable units that would be provided. We believe it would be undemocratic for the Council to grant planning permission without public scrutiny of proposals for affordable housing.
- Parking. We believe the proposed numbers of parking spaces falls well below required development plan standards.

(Officer Note: The Neighbourhood Plan has not reached a point at which the Council consider it to be a material planning consideration. Para. 216 and 11 - 14 of the NPPF 2018 confirm this position).

ICKENHAM RESIDENTS ASSOCIATION (17 JANUARY 2019)

On behalf of the residents of Ickenham, we object most strongly to this inappropriate development proposal at the former Master Brewer site. The latest application is fundamentally different to the plans presented at community events, events where the developers suggested that they had listened to and taken on board the community comments concerning many of the issues below.

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

Visual Impact

We are only assessing the residual impact once the building and landscaping proposed has been developed. This proposal is totally out of character with the surrounding area in relation to its size, bulking, mass and design. It would be incongruous placed alongside all other buildings in the immediate area, and completely alter the skyline. This size scale and bulking of the proposal is more akin to a central London site. At a maximum height of nine storeys it is higher than most of the flats and Offices in Uxbridge, an area designated a Major Town Centre.

The site is an island; bordered by very busy roads. This is likely to keep residents within the development more so that a similar sized development in a different setting; further exacerbating our concerns about overcrowding. It also makes the need for spacious and top-quality amenity space all the more pressing. It is scarcely believable that the applicants have not explored opening up the significant green space to the east of the site. This would significantly improve the scheme, but the applicant seems to have decided that because some of the land is privately owned, the option did not warrant further consideration.

The GLA have been clear that such high residential densities could only be considered if the scheme was outstanding in terms of design. The applicant has updated their proposal in this respect, but despite the very impressive graphical representations, we remain wholly unconvinced that the scheme is of high design quality. Permeability throughout the development is poor, with opportunities to open up different entrances ignored. No attempt has been made to respond to or reinforces the locally distinctive patterns of development. Public and private spaces cannot be clearly distinguished, with a lack of clarity on access to some of the areas of green space. Amenity space provided is the bare minimum to comply with policy expectations and appears of basic quality; a long way from the kind of high quality that could offset the astronomic density levels.

The focal point of the proposal is a modest and uninspiring 'town square' located at the entrance of the development. We welcome the concept of a significant parcel of public realm, centrally located and of top quality. Unfortunately, the square proposed is tiny, not square, located in the corner of the development out of sight and out of mind of many potential residents. Density levels seem highest in the parts of the development that are furthest from public transport; which seems counter-intuitive and contrary to established best practice. The proposal also lacks any kind of landmark to distinguish it from any other new developments; there is no clear image or memorable feature.

The Master Brewer Site sits adjacent to important views from immediately adjacent, and distant, views of Green Belt land, is adjacent to a Local Conservation Area, and nationally listed properties, within the 1 Kilometre radius. The existing buildings in the more immediate vicinity of the

development site are mostly 2-3 storey shops/flats built in a clearly residential style and 2 storey houses. The Development will be the first buildings to be seen on arriving in Hillingdon from the west on the M40/A40 roads transforming from open country side views to a brick collection of monolithic, 5 to 9 storeys, up to 30m, tall massive blocks of flats before proceeding back to open country again on the A40 past Northolt Airfield on one side and open fields on the other.

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

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

The Visual Impact Assessment included in the application suffers from a number of omissions and gross inaccuracies.

- 1 It identifies a number of viewpoints from which the new development could be seen but fails to evaluate them all.
- 2 It has failed to identify a number of susceptible viewpoints which we have assessed below.
- 3 Although the assessment claims to have taken the worst-case impact in the winter, (see TVIA Appendix D) in fact the wireline superimpositions of the development on the landscape have been shown on summer photos (see TVIA Appendix G).
- 4 The landscape impact photos have been presented to the LPA on A3 paper, and the applicants claim that to get a true representation of the landscape these photos should be held at a viewing distance of 30 cms. from the eye. This is wrong; in fact, they would have to be printed on A1 paper and viewed at this distance to get a true representation. So, the actual impact is FOUR TIMES greater than that presented. So, the altered vistas for the few viewpoints they have assessed will need to be re-evaluated in order to give a fair assessment.
- 5 The buildings will require ventilation plant to be installed on the roofs which has not been shown on the impact photomontages.

Viewpoints not assessed

Please see attached document with photographic evidence (P = photo number)

a) View from Hillingdon Station Concourse. The applicants have chosen a viewpoint from behind the Swallow Pub such that the building partially obscures the view of the new development. Our viewpoint P5 is in front of the station where passengers exit and where customers of the Swallow Pub can sit outside. It is therefore highly susceptible due to the very high pedestrian use of this area. The change in value of landscape from open view of the greenbelt, Harrow-on-the-Hill and beyond to a massive dominating structure (it would rise 23m, or over twice the height of the lampposts, above the road level at that point) is clearly very high.

b) View from the mini roundabout

The mini roundabout is used by pedestrians as well as road users, particularly staff and pupils of Vyners School. Again, the open views over Greenbelt Land will be completely changed for the worse (see P6) and therefore there will be a severe adverse effect for a susceptible viewpoint.

c) View from Hillingdon Circus

See P3 The viewpoint from Hillingdon Circus is highly susceptible due to pedestrians en route to the station as well as shoppers and residents. Again, the furthest building will emerge 23m above the top of the road to the station, that is over twice the height of the lampposts.

d) View from the Local Centre P2 shows the view from the shopping parade including the previous building, the Master Brewer Hotel. The building proposed to replace it would be eight storeys high, against the three storey Master Brewer. P4 gives a view looking south from the Bridge over the A40

and Metropolitan & Piccadilly railway lines showing the old Master Brewer Building and lampposts again providing the possibility of gaining an impression of the relevant actual and proposed heights. P1 shows the type of existing housing the vicinity of the proposed site comprising mostly of flatted dwellings above shops with standard houses and flats east along Freezeland Way mostly of two or three storeys. It also gives an indication of the heights of the buildings in relation to the height of the street lighting lamp posts. It is clear that the proposals represent a massive change of the street scene.

Other very important viewpoints have been omitted those from:

- 1) the junction of Halford Road with Long Lane looking south
- 2) Daltons Farm in the Greenbelt, Conservation Area where the impact would be even greater than that from Ickenham Manor

Viewpoints not properly assessed

For the reasons given above, the TVIA contains many errors and understatement of the visual impact. To draw attention to just two, the views from Hillingdon House Farm, and Ickenham Manor are highly susceptible and both would suffer high degradation of the landscape when properly assessed. Therefore, the residual effect would be MAJOR ADVERSE.

In summary because of the adverse impact on the landscape from a number of susceptible viewpoints and the major change to the street scene, the application should be refused because it does not comply with the following UDP policies: OL3, BE13, BE19 and BE36

Over Development

London Plan Policy 3.4 'Optimising housing potential' gives a clear indication of the number of homes that should fit onto a given site. LBH have set the PTAL score (2\3), the application states the site is 2.5257 hectares, our analysis shows the proposal has an average of 2.7 habitable rooms per unit (1,191 habitable room and 437 homes).

The site is clearly a 'suburban' area, characterised by predominantly lower density development . Within these parameters: The London Plan expects 50-95 homes per hectare. The application proposes 173 homes per hectare London Plan Policy 3.4 states that "development proposals which compromise this policy should be resisted". The application clearly compromises the sustainable residential quality policy, so we strongly urge LBH to refuse the application.

Furthermore, the proposed density actual exceeds the sustainable residential quality for developments classified as 'urban' which are areas with predominantly dense existing development, with an acceptable range between 70 and 170 homes per hectare. The proposal falls with the acceptable sustainable residential quality for the London 'central' definition, which is defined as "areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre". By absolutely no stretch of the imagination can Master Brewer be considered to be 'central London'. In considering this issue, we also wish to draw decision-makers' attention to the historic over-supply of homes in Ickenham.

Recent central Government targets show an annual figure of 600 homes per year for Hillingdon. Ickenham (more specifically, the Ickenham Neighbourhood Area) makes up around 4% of Hillingdon's population, providing a pro-rata annual target of around 25 homes per year for the village. Since the adoption of the Local Plan part 1 in 2012, around 650 new homes have been permissioned or built in Ickenham. Completed developments include the RAF West Ruislip base, around 15 large homes converted into flats, developments at and around Charles Curran House and permissions at Pete's Cottage and the recently demolished Congregational Chapel in Ickenham Road.

Departure from the Development Plan

Hillingdon UDP policy PR 23 sets a requirement for development to maintain a satisfactory relationship with nearby residential properties. We believe the application fails to meet the criteria set out in the UDP PR 23, meaning granting permission would be a departure from Hillingdon's Development Plan. While these policies may be relatively old, their spirit is clearly maintained in the emerging Local Plan Part 2, which has been subject to two public consultations. The applicant calls for 'limited weight' to be applied to Local Plan Part 2. We disagree, and simply direct LBH to the NPPF paragraph 216 which provides clarification on the weight that can be given to policies in emerging plans. Furthermore, on the subject of emerging planning policies, we also wish to draw to LBH's attention the Hillingdon Circus 'community masterplan' which has been published in draft form by the Ickenham Neighbourhood Forum. The Association is one of several local residents' groups who have played an active role in the creation of the masterplan (developed as part of the emerging Ickenham Neighbourhood Plan).

The masterplan sets out a different vision for the Master Brewer site, with a housing target inline with London Plan density policy, a maximum height of five storeys to ensure the development integrates into the surrounding area, improved access to the green belt land adjacent and provision of family houses as well as flats. Local Plan policy 7.11 is also compromised by the proposal, which states:

"In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape."

Provision of Affordable Housing

Because the application is silent on delivering the Hillingdon (or London Plan) requirement for provision of affordable housing, and LBH have not published any details of a viability assessment submitted by the application to attempt to haggle-down the percentage of affordable units (as required by the GLA's Affordable Housing and Viability Supplementary Planning Guidance (para 1.18-1.25) we have no choice but to assume the applicant is aiming to deliver no affordable housing. This is entirely unacceptable.

Parking

The new proposals only allow for 0.5 spaces per dwelling plus commercial spaces. Based on maximums for new homes in Hillingdon's Local Plan Part 2, 699 spaces should be provided for the 437 homes proposed, with potentially a further 55 needed for visitors and 20 for retail units. This gives a car parking spaces number of 774, in what is a suburban location with high car ownership. The development should provide secure off-street parking to allow residents to safely leave cars at home and use public transport. The way around this predicament is for the applicant to reduce number of units to match the proposed car parking arrangements.

Traffic

It is clear that a development of this magnitude would generate considerable traffic movements in a junction that is already frequently at capacity. The proposal does not show (through lack of traffic simulation evaluation) that it complies with UDP AM7.

Trip Generation

Trip generation (6.2.1) is given to suggest how many extra car (etc.) journeys will be made. This is

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

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

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

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

Vehicular Trip Distribution

- In 6.5.1 it is mentioned that a trip distribution and assignment methodology has been agreed with TfL which follows the methodology used in the 2012 Transport Assessment (correspondence in Appendix A (actually Part 6)). It is stated that "for consistency" the same development trip assignment turning proportions identified in that assessment (which were based on turning counts) have been used for this assessment. As such, it is envisaged that 25% of traffic will arrive / depart from the north, 25% from the east, 25% from the south and 25% from the west.

- This is an arbitrary assignment. It is our experience that an equal 25% split is far from reality. Evidence from a real survey is needed to support these figures.

- Further observations on additional trip justifications: 6.6.3 mentions the additional traffic from the RAF Uxbridge development. However, there is no real justification for the figures. This is the same with the RAF West Ruislip development (6.6.4) and the Swakeleys School expansion (6.6.5). There appears to be a failure to account for these properly.

- In 6.6.8 they claim that the above accounts for additional trips and then claim in 6.6.9 that as an office development at HC will not be going forward these will be less. This makes no sense as the above is independent of the office development. LINSIG/VISSIM Assessment

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

- It is impossible and unfair to expect to comment on these models and their results. The IRA has traffic simulation experts that understand these models and their assumptions. In the past attempts to model and simulate HC have been extremely poor and misleading. It is therefore not enough to say that these will be done later. Both need to be scrutinised in this process. Observation - This makes it extremely difficult to work on as the models are not complete or reported on. It is concerning that the VISSIM model only appears to address the manual count peak (on a Thursday am and a Saturday pm). "A VISSIM microsimulation model has been built, calibrated and validated to represent the traffic conditions recorded during the traffic surveys (12th January 2017)." The VISSIM model covers two hours in the AM peak and two hours in the PM peak (8.7.1). There is no sensitivity analysis here. It again seems to assume that output roads never block. It is impossible to tell as the model report is not included as noted above.

Air Quality

This is an opportunity for all of us to take our poor local air quality seriously. Is this the right place for a development of this size and design, sandwiched between the M40 Corridor and the busy and often congested local urban traffic at Hillingdon Circus? It is widely known that air pollution is worsened by traffic emissions. Petrol and diesel engines emit a variety of pollutants, and we can

identify nitrogen dioxide, sulphur dioxide, carbon monoxide, carbon dioxide and the particulates P2.5 and P10. Drawing on from this, the following equation is selfevident: Traffic Congestion= Poor Air Quality and Pollution= Health Problems. This becomes a public health issue, because nitrogen dioxide can irritate the lungs and lower resistance to respiratory infections. People with asthma are particularly affected.

The GLA has identified 17 Air Quality Focus Areas in the Borough, which represent the key hot spots where air quality is poor and public exposure is the highest. Hillingdon Circus/ Long Lane is one of these. Air quality monitoring takes place at Hillingdon Circus by way of nitrogen dioxide diffusion tubes located at Freezeland Way. Palmes-type diffusion tubes are widely used in the UK for indicative measurement of ambient concentrations of nitrogen dioxide. The results have to be "biased adjusted" at the end of each year. Exceedance of the nitrogen dioxide mean air quality objective of 40 micro-grammes per cubic metre has been the feature at Hillingdon Circus for some years!

The 2016 London Plan requires development proposals to be at least air quality neutral and not lead to further deterioration of existing air quality. In addition, large scale developments are required to propose methods of achieving an air quality positive approach. Where the air quality is not neutral, it requires additional mitigation measures that are quantifiable and contribute substantially to the reduction of the levels of pollution in the area. To support this, the Council should be requesting a more stringent approach for the assessment of new developments within the Hillingdon Focus Areas. Where increased emissions from the proposed development have not been appropriately addressed, either at the design stage or quantified mitigation.

Compensation for air quality impacts will be addressed through a section 106 agreement. The contribution required is calculated by use of the damage cost approach for nitrous dioxide, as set out in Defra's Air Quality Damage Cost Guidance. The London Borough of Hillingdon has published an "Air Quality Annual Status Report" for 2017. The date of publication: May 2018. This report, part of The Air Quality Action by The Borough, is to be highly commended. The report has been produced by Val Beale and her team. Even though the parking spaces are reduced this will still cause an impact on Hillingdon Circus and will compound the issues we have experienced lately around the HS2 works; simply the network is at capacity as we said in our previous response. (Appendix 1) We have also looked at the emissions based on the new numbers and even these reduced numbers will impact the level of toxic emissions at Hillingdon Circus; one of the areas in Hillingdon with the highest level of emissions anyway.

Ickenham does not need another 100 tonnes of CO₂ a year, nor do we need any more dangerous particulates that could impact the health of the residents of Ickenham for years to come. The tables below were produced using the latest model from Defra and assuming more efficient vehicles Master Brewer Site -437 dwellings at 0.5

Noise Pollution

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

Amenity space

It is clear from the Design and Access statement 6.1 that the developers plan to maximize the saleable living space and minimize the amenity space, so that the square meterage falls only slightly above the HDAS minimum requirements. We would expect a development of this size and density to offer far greater amenity space for the benefit of its residents, and certainly of better quality than is shown on the plan of the breakdown of amenity spaces, simply squeezed between and around the buildings. Section 6.1.2 refers to "management of the development edge adjacent to the Green Belt land will improve access and encourage community use as well as providing both physical and visual links to the Green Belt land. The application fails to provide any substantive detail on access (just a couple of blue arrows), which is a UDP policy requirement, or any commitment to improve the green belt land for community use. The application also fails to mention that the view FROM the green belt land will be ruined by the high rise over development.

Section 6.1.3 refers to the easy links to nearby open spaces for use by children of various ages. However, in order to reach those spaces, children would need to traverse the Hillingdon junction where traffic is often at capacity, or a road with fast traffic. The crossing time at the pedestrian lights at the Hillingdon Circus traffic lights has been measured, and given the time taken to cross all the roads, many pedestrians cross without waiting for the lights to be in their favour. This is obviously a safety issue, as is the fact that the entire site and surrounding roads are heavily polluted and certainly those at and immediately around the site are totally unsuitable for a children's play area. Section 6.1.4 suggests that a development of 377 flats may contain 131 children to be catered for in formal and informal play areas. Should that be an under-estimate, then the provisions proposed would be woefully inadequate.

Local facilities

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

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

ICKENHAM RESIDENTS ASSOCIATION (November 2018)

IRA 11/11/2018

In order to comply with the current consultation period concerning the above amendment, we send you as our first response our comments and objections to the proposed and amended traffic proposals for the Hillingdon Gateway.

A more detailed reply to the above amendment as a whole to follow shortly.

We object to the amended proposals for the Hillingdon Gateway on the following grounds:

The undoubted Traffic impact that will result from the development, the associated pollution caused by increased volume of traffic and longer duration journey times and the contradiction of data and conclusions in the VISSM LMVA, the Transport Assessment and the Gateway Addendum.

We assert that the revised VISSIM model does not account for the exit blocking at Hillingdon Circus, the error logs for vehicles that could be loaded into the model and the fact that the North to South route is the only viable route that traffic can take and therefore any assumptions that traffic will choose an alternative route are flawed. Nor does it consider the additional traffic that will be generated by the HS2 project.

We have also identified several anomalies and/or contradictions:

VISSM LMVR

- In the LMVR, the model assumes 100% compliance with (Section 2.15) junction priority rules, give way compliance, keeping yellow box junctions free, and compliance with traffic signaling. However, the LMVR itself acknowledges that the behaviours observed at the time of the surveys shows this not to be the case; therefore, the model is flawed.
- The 'observed' and modelled numbers in general are different, so the model does not reflect reality
- The Link flows modelled and observed especially for heavy vehicles has a large discrepancy
- Saturation flows show difference between observed and modelled

Transport Assessment

- Table 9 can it be confirmed that 450 vehicle movements have been modelled, and also can any assumptions about flexible working and greater spread of movements outside peak times be provided.

Signal Optimisation

- Signal Optimisation report acknowledges that Hillingdon Circus is already "at or close to capacity" and that "there is limited options available" around signal Optimisation, yet additional vehicles from the development will have no impact. We therefore disagree with the conclusion that the outturn will be no worse than it is currently.
- Any change to 'green time duration' poses a risk to pedestrians having less time and making a dash for it, as highlighted in the Tesco proposal for the old Master Brewer site

Hillingdon Gateway Addendum

- The Gateway Addendum states that there has been no increase in traffic since 2010, what about Ickenham Park and Glebe School Changes?
- The conclusion in the addendum also contradicts both the Tesco and Morrisons Transport Assessments that both stated with the "current growth levels Hillingdon Circus would be over capacity by 2021".
- In section 3.2.2 - Degree of Saturation, table 3.2 shows an increase in 10 of 13 locations in the am peak and only an increase of 2 in the pm peak. Where did the vehicles go?

It is our belief that because of the items outlined above that conclusion that there will be minimal impact on the volumes, journey times, and time to exit the Hillingdon Circus junction is incorrect. Any local resident knows only too well that even a minor incident on the local network often leads to gridlock in the local area.

External Consultees (Additional)

OAK FARM RESIDENTS ASSOCIATION (OFRA) Summary

Having reviewed in detail the recent revised submission put forward by the Developer, OFRA is calling for a complete rejection of the current proposal for the reasons outlined and listed below. Given the constraints of the site, which are heavily acknowledged throughout Borough planning and local implementation guidance, the proposed scheme continues to be unsuitable in both housing density and scale. Its height and appearance are off central urban design, which would have significant and negative impact on the local amenity. The increase in scale from buildings in Hillingdon Circus and surrounding area remains too great at over double the existing streetscape. Harmonisation is also poor, with the overall design representing a complete departure from the prevailing style and landscape of its surroundings, something that the developer has not attempted to address in revised proposals. to. The overriding visual impression is of development that has been designed without due regard to its surroundings. Existing greenbelt views remain significantly compromised at points in Hillingdon East (from Granville, Freezeland Way, Hillingdon Circus), and

the proposed scheme prominently visible from the Ickenham Manor conservation area, and its approaches, breaking the treeline. The harsh outline of the current proposal is exacerbated by the lack of pitched roof design - the predominate characteristic and the prevailing feature of its surroundings, and Borough as a whole. Current design completely ignores this. Currently there are at least two similar sized and sited major developments under construction on the A40 where local planning authorities have deemed it correct to restrict building heights to a mixture of three, four and five levels, in a semi-urban metro style. The report by Meyer's consultant Montagu Evans states clearly that without significant reduction in height and softening of the upper storeys in appearance, the proposal will always be to a scale and appearance that will negatively impact and not be in keeping with its local environment. Of concern is the upward revision in parking provision to a 1:1 ratio directly in an area that has been and remains, a TFL and Borough Air Quality focus zone. Planning acceptance would mean the Borough actively facilitating an increase in congestion and car movements, and be predominately air quality negative. The initial scheme was projected to add an average of 103 car journeys to Circus at peak hours, the upward revision increases this to approximately 150 and contravenes all current National and GLA guidelines, the London Plan, and Borough commitments made under Local Implementation Plan objectives 2, 3, 6, and 7. The Borough has well stated commitments and targets in Local Transport, Environmental and Air Quality Plan's to reduce congestion and improve air quality levels on A437 Long Lane /A40 Freeze land Way. Of the total NO2 emissions for Hillingdon, over 51% is from ground-based transport, this is the highest percentage and per capita figure for all the London boroughs. The revision to a 1:1 ratio exceeds current PTAL rating for the site, will increase congestion further, and be detrimental to the health of the local community. Given the Developers continually stated transport assertions during submission and consultation, that occupiers would be primarily commuters using Hillingdon Station, the increase in provision is contradictory in both planning and policy terms, and environmentally unsound. The Noise and Accoustic assessment appears flawed in several areas, criteria and ratings applied lower than they should be for a noise sensitive development that potentially achieves a SOAEL rating.

OAK FARM RESIDENTS ASSOCIATION

The proposal at 377 units is excessive, overbearing in scale and environmentally unsound given its local suburban setting. It represents overdevelopment on a site where both planning and Local Plan policy indicate a desired housing density of under 200 homes. Little or no regard has been paid to local transport issues, and the impact the development would have on its immediate area. There is an assumption that occupants will use public transport, but this is not backed up by sufficient evidence. The area suffers from chronic congestion, which impacts heavily on local feeder roads, and air quality as traffic reaches virtually standstill for hours at a time. A development of this scale, with main entrance and exit within 100m of Hillingdon Circus would have a severely negative impact on already congested local road network.

Mitigating actions to combat Air Quality and Noise Pollution which both already exceed legal of levels in the immediate and periphery areas, are not sufficiently set out or evidenced to allow a neutrality assessment to be made. LBH' s Local Plan and associated planning policy statements categorically state that it will not approve development that increases current levels of pollutants in this area, a designated pollution control area and TFL focus zone since 2002. The type, scale and number of units proposed will lead to a significant increases in harmful pollutants over both the construction and legacy periods of the development. Current local and national guidelines point to lower density and less intense development where Air Quality breaches national guidelines.

Figures obtained under the Freedom of Information Act and supplied by the LBH show Noise Decibel levels exceeding required statutory day and night time levels on a daily basis in both the immediate development area and Long Lane corridor . It is highly questionable whether higher density development could physically comply with current legal requirements, and sustained exposure to the higher levels close to A40 would be impactful on quality of life considerations set out in EU

directives.

The appearance, height and design of the development is completely out of character with its local environment, both in scale and architectural design. Even taking into account roof usage all local buildings in the immediate vicinity are at prevailing height of around three storeys. In order to fit with the Local Plan guidelines the design should complement and take account of local character. This would indicate an average height of three storeys, increasing to four, with a maximum height of five storeys including roof usage where the site is sufficiently set back or screened from view. Heights of seven, eight and nine storeys will detrimentally and directly affect local and green belt views from all immediate angles. The design does not reflect local design character in any form, proposing flat roofs where local style is predominately peaked design. The block design is of a style suited to central urban development not suburban development.

There is little or no provision, or plan for the addition of good quality amenity or restaurant services that are present in other local high streets and missing from the Hillingdon East area. Inclusion and better planning for good quality chain or local stores on a limited and select basis, where traffic generation is kept to a minimum, is needed to rejuvenate the area, and should be a feature of any proposal.

Environment and Tree surveys submitted with the plans identify numbers of established native Red Oak, Common Oak, Lime, Field Maple, Poplar in the boundaries of the development, and a very large Willow at the centre of the development. Not having access to the site we were unaware as Residents Association that Oak was present in numbers, and an established Willow of size was present centrally, the current plans do not fully protect these trees, which are of important visual and environmental amenity, and would further enhance the visual appeal of any completed development, providing continuity with the protected adjacent green belt. The development boundary should be brought in to ensure established Tree cover is protected. The Willow and other key species should be considered for TPOs.

The current plans do not take into account the impact of any development at site B adjacent to the Master Brewer site. The presence of two major development sites so close to each other implies under current planning rules, and the Local Plan, that potential housing densities and their impact should be considered together as part of any individual site application.

Local services are under pressure, the local Doctors surgery is over subscribed. Nurseries and Schools at capacity, all point under current planning policy considerations to plans that can be accommodated within existing infrastructure and service delivery within the Borough. OFRA notes that due to successful development elsewhere the Borough has exceeded its housing development targets therefore development at a reduced scale can easily be accommodated.

OAK FARM RESIDENTS ASSOCIATION 8/1/2019 (December 2018 consultation)

OFRA has reviewed the recent amended proposal put forwarded by M B Hillingdon Limited. The sudden withdrawal of its Sept 2018 proposal and replacement with one that is over a fifth larger is surprising - having stated in its last submission, and very publically during stakeholder and community outreach consultations' that previous building height and unit reductions (7 floors, 359 dwellings) were made in direct response to LBH and community feedback. The reduction in allocated parking to 0.5 is welcome, but negated by the increase of 78 housing units & reintegration of 9 storey blocks, heavily exceeds prevailing housing density.

No attempt has been made by the developer to address style or core density concerns. The proposal is in complete conflict with Draft New London Plan Policy D1 B 1 stating that Development Design should respond to the local context by delivering buildings and spaces that are positioned & of a scale, appearance and shape that responds successfully to the identity & character of the

locality, including to existing and emerging street hierarchy, building types, forms and proportions. Comments by the GLA planning team (Oct18) indicate that it has been selective in its interpretation of the London and Draft London Plan policy & commitments in order to steer the developer in the direction of a higher density scheme that ignores both local character & the planning constraints of the site. This is a noise sensitive, poor air quality location with appalling congestion at core hours. Development of this density will negatively impact on air quality & local infrastructure. - The Consultation' was not a consultation; at no point has the developer communicated its intention to increase the number of units & height of the development to its wider stakeholder group, publicly stating the opposite during meetings conducted only in relation to its previous proposal. Design remains central urban in nature and scale; building style & appearance does not attempt to harmonise with its existing environment in any manner, shape or form. - The Townscape assessment acknowledges that this will have a High Adverse Effect & change the existing roofline of the street and scale of the streetscape at Long Lane, Freeze land Way and Hillingdon Circus. The assertion by the BMD assessment that this would be prominent but in equilibrium with prevailing townscape characteristics is absurd, given its height and scale, & contradicted by the Montagu Evans assessment. - The Bird Hazard Assessment states that the flat roof design will create habitat that will be attractive to species observed in the locality, and on completion risk change the composition of current wildlife, weighted towards those species more hazardous to aircraft, therefore increasing the likelihood of Bird Strike. Given the sites position to RAF Northolt & changes to mixed use air corridors this is a risk that has not been adequately considered. - The Acoustic Noise Impact Assessment demonstrates that in its current form the development fails to meet maximum WHO and BS8233 standards for community noise. Nearly all areas of the development continue to exceed the LAeq 8hr 30db noise limit for bedrooms at night after design mitigation has been applied - The London Plan states that noise sensitive development should be separated from major noise sources by use of distance and screening, the proposal does not provide for this effectively enough. - The Mayors Ambient Noise Strategy states that development proposals should have particular regard for the impact of aviation noise on noise sensitive development but aviation noise is not incorporated into measurements supplied to date. Current assessment is not fully evidenced.

LONDON UNDERGROUND

I can confirm that London Underground Infrastructure protection has no comment to make on this planning application. These comments relate only to the London Underground infrastructure protection issues raised by the application. They should not be taken to be representative of the position which may be taken by the Mayor and/or another part of TfL. You are advised to consider whether it is also necessary or appropriate to consult other parts of TfL and whether the application should be referred to the Mayor as an application of potential strategic importance pursuant to the provisions of the Town and Country Planning (Mayor of London) Order 2008. All other consultations with TfL should be made by emailing boroughplanning@tfl.gov.uk.

NATS (SAFEGUARDING)

No safeguarding objections.

CADENT GAS LTD

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

TRANSPORT FOR LONDON TfL (Jan. 2019)

Please note that these comments represent the views of Transport for London officer and are made entirely 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 do not necessarily represent the views of the Greater London Authority (GLA). TfL understand that the application has been referred to the Mayor of London and updated transport comments in the Stage 1 report will reflect the comments below. The contents of this letter relate solely to transport and do not prejudice any subsequent Mayoral Planning Decision.

Site Location and Context

The development site is located on Freezeland Way which is currently vacant brownfield land that was formerly occupied by a Master Brewer Motel and pub. The development site is bordered by the A40 Western Avenue to the north, which forms part of the Transport for London Road Network (TLRN), Freezeland Way to the south, Long Lane to the west and green belt land to the east.

The site is adjacent to Hillingdon London Underground station, accessed by crossing Hillingdon Circus and walking approximately 200m north along Long Lane. Hillingdon station is served by Metropolitan and Piccadilly Line services, as well as the U2 bus route. There is currently only one vehicular entrance to the site which is through the southwest corner off Freezeland Way.

Consequently, the site records a Public Transport Access Level (PTAL) of 3, on a scale of 0-6b, where 6b is best.

There have been previous applications for this site, all mixed use and all including proposals for a food store. An application submitted in August 2017, introduced a significant number of residential units, which was subsequently amended in August 2018. The current application, to which this letter relates, is a further amendment to this scheme, which has not been determined by the council, increasing the number of residential units to 437.

Access

The site access junction remains as per the previously submitted schemes, which is taken via an existing vehicular entrance on the southwest corner of the site which will be upgraded in order to deal with the increased vehicular movements. A new right-turn filter lane is proposed on Freezeland Way. In strategic terms, this remains a satisfactory approach.

Car Parking

The revised application proposes a decrease in residential car parking to 219 spaces from 359, equating to a ratio of 1 space per 0.5 units (from 1 space per unit), which is welcomed and is strongly supported by TfL. This is in conformity with draft London Plan Policy T6.1 and helps to deliver Mayoral modal shift targets outlined within the Mayors Transport Strategy (MTS). 20% active and 80% passive electric vehicle charging points (EVCP) should be provided from the outset, in order to conform to Draft London Plan Policy T6.1 and this requirement should be secured by condition. A total of 34 accessible bays are provided, which is above the 1 space per dwelling for 3% of dwellings requirement outlined in draft London Plan Policy T6.1. In order to fully conform to this policy, it should be demonstrated, in a Parking Design and Management Plan (which should be secured by condition), how an additional 10 accessible bays can be provided in the future, to equate to 10% of dwellings provided with a disabled persons parking bay, should demand arise. The Parking Design and Management Plan should also include a parking allocation strategy for which a permit system should be employed rather than a physical allocation of spaces in order to conform to draft London Plan policy T6.1 B.

Cycle Parking

The revised application proposes 779 long stay residential cycle parking spaces which is in conformity with draft London Plan policy T5 and is therefore welcomed and supported. A total of 12 short stay cycle parking should be provided in order to conform to draft London Plan policy T5, whilst this minimum standard should also be met for the non-residential uses on site.

Cycle parking is to be located in secure, covered location and is readily accessible in accordance

with draft London Plan Policy T5 and Mayoral Healthy Streets principles outlined within the MTS. Where two-tier racks are provided, it is recommended that they should have a mechanically or pneumatically assisted system for accessing the upper levels as many people find using these spaces difficult. The product must allow for double locking and minimum aisle widths, as set out in the London Cycle Design Standards (LCDS), which must be met in order for these spaces to be usable. The draft London Plan also requires proposals to demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people. This is an accessibility requirement. The LCDS requires at least 5% of spaces to be able to accommodate larger cycles and the easiest way to meet accessibility requirements is to provide a mix of cycle stands, preferably including Sheffield stands.

Trip Generation

The trip generation methodology has been revised to reflect the decreased level of residential car parking and increase in units. The survey sites cumulatively have a unit number of 275 and parking ratio of 0.57, and are all located in Outer London Boroughs, which reflect the site characteristics. The approach taken is acceptable and presents a reasonable estimation of the sites trip generating potential.

Based on the revised assessment, 437 dwellings are anticipated to generate approximately 219 and 211 two-way trips during the peak hours respectively, which is a decrease on that in the previous submission. This is likely due to the updated methodology using the TRICS database rather than the older TRAVL surveys, which are no longer acceptable. Of these trips, 26 in the AM peak and 42 in the PM peak will be made by car drivers. The additional trips can be accommodated on London Underground (LU) services and TfL is satisfied that the proposals will not adversely impact the A40.

Buses

As per the previous submissions, TfL requests a financial contribution of £75,000 per year for 5 years, to fund bus service improvements in the local area. As previously, TfL considers that most new bus trips, as a result of development, will be in one direction and possibly concentrated in a shorter peak period of around 30 mins, which will cause crowding on the existing network. The contributions total is £375,000, and this should be secured by S106 agreement.

A further contribution capped at £30,000, which has been agreed in principle with the applicant, to fund the introduction of bus priority equipment to protect operation of the bus network should be secured by the S106 agreement.

Servicing and Construction

An Outline Delivery and Servicing Management Plan (DSP) was submitted as part of the original submission which outlines that a total of 59 daily servicing trips are forecast (including 10 HGVs), with 6 trips during the AM peak and 7 trips during the PM peak hour. It is expected that the retail units will generate a maximum of 2 HGV trips, which would be scheduled to take place outside of the peak hours, with the remaining trips expected to be LGVs. The applicant should submit a full DSP prior to occupation and this requirement should be secured by condition. The full DSP should be produced in accordance with TfL best practice guidance available at: <https://tfl.gov.uk/infofor/urban-planning-and-construction/transport-assessmentguide/guidance-bytransport-type/freight> and include measures to reduce the impact that the development has on the surrounding network including booking systems and co-ordination of deliveries. Furthermore, all suppliers should be registered with a best practice scheme such as the Freight Operator Recognition Scheme (FORS).

TfL notes that an outline Construction Management Plan (CMP) has been submitted as part of the original submission. A full Construction Logistics Plan should be submitted in accordance with TfL best practice guidance available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessmentguide/guidance-by-transport-type/freight> and include consolidation of trips to minimise the impact that the construction will have on the wider highway

network. This should be submitted to Hillingdon Council, in consultation with TfL and approved prior to commencement of works on site. This requirement should be secured by condition on any consent.

Travel Planning

Whilst a Travel Plan was submitted as part of the original submission, this document has not been amended in relation to the amended proposals, which should be reviewed. The Travel Plan should include hard and soft measures to achieve mode shift targets from single occupancy vehicle trips to the site. The finalised version of this document should be secured by condition.

Community Infrastructure Levy

The Mayor of London introduced his Community Infrastructure Levy (CIL) on 1st April 2012 to help implement the London Plan. The Mayor has arranged boroughs into three charging bands. The proposed development is in the London Borough of Hillingdon, where the charging rate is £35 per square metre of floorspace.

In June 2017, the Mayor published proposals for an MCIL2 to contribute to Crossrail funding. This would be levied from April 2019, and would replace both MCIL and the Crossrail S106 contributions scheme.

Summary

In conclusion, TfL is very much supportive of the amended proposals which provide car parking and cycle parking in accordance with standards outlined in the draft London Plan. TfL now believe that the scheme is acceptable in strategic transport terms subject to contributions of £375,000 and £30,000 towards bus capacity and bus priority infrastructure respectively being secured, alongside relevant planning conditions and obligations securing Travel Plans, a construction Logistics Plan, Delivery and Servicing Plan, Parking Design and Management Plan.

MET POLICE Designing Out Crime Group (DOCG) (Jan 2019)

I have met with the applicant in relation to this proposal. I have explained to them what is required in relation to Secure By Design (SBD), which this proposal can achieve. I do not wish to object, however I am concerned about the external residential cycle storage as this is not a safe and secure way to store cycles. I request a condition is attached that SBD accreditation is achieved by this development. If justification of this request is required, please contact me.

ENVIRONMENT AGENCY (Jan 2019)

We have no objections to the proposal as submitted and we have provided some non-site specific advice below. No further consultation is required regarding this application.

Advice to LPA

The site has been identified in the submitted Flood Risk Assessment as potentially being at risk of surface water flooding. The responsibility for giving advice on major planning applications for surface water flood risk transferred from us to Lead Local Flood Authorities (LLFAs). As we are no longer a statutory consultee on sites over a hectare, you will need to consult your LLFA about managing the surface water drainage from this proposal.

NATURAL ENGLAND (Jan 2019)

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 15 September 2017.

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

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

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. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

HISTORIC ENGLAND 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.

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

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:

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.

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

The planning application lies in an area of archaeological interest. 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: 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.

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

For stage 1 trial trenching should be focussed on areas away from the recently demolished modern buildings and comprise a 4-5% sample of the site. If significant remains are found then a further stage of investigation will be necessary.

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.

Internal Consultees

PLANNING POLICY (20/12/18)

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).

Whilst there are modifications proposed to SA 14 within the SOPM (2018), it is not considered that there is an unresolved objection to the principle of inclusion of the site for mixed use redevelopment or the criteria identified in Paragraph 5.1 of these comments. As such it is considered that weight may be given to SA 14. The indicative capacity of this site has increased to 250 units. Ultimately however the final capacity should be determined by a design-led approach.

Furthermore, whilst there is a minor modification to the wording of DMHB 10: High Buildings and Structures, it is not considered that there is an unresolved objection to the policy and as such, it is considered weight may be given to emerging Policy DMHB 10: High Buildings and Structures. As outlined in Paragraph 5.32 high buildings and structures are those that are substantially taller than their surroundings, causing a significant change to the skyline. The scheme is not located within Uxbridge of Hayes Town Centre. Whilst allocated as a site allocation within the Local Plan Part 2, the amended indicative capacity is for 250 units and thus is not identified as an area appropriate for a 9 storey building

SUSTAINABILITY OFFICER (Jan. 2019)

There is a need to secure off-site mitigation through the improvement of the neighbouring green belt land to provide ecological and recreational benefits.

Energy

The energy assessment sets out an array of measures onsite to reduce CO₂. The residential

element of the scheme needs to be zero carbon in accordance with the London Plan (policy 5.2). The assessment shows a substantive shortfall of 55% (although the corresponding CO2 tonnage figure is inaccurate). The proposed onsite measures (45% reduction) need to be coupled with an offsite contribution (Policy 5.2e) to secure the remaining 55% in order for the development to be policy compliant.

Off-site Contribution

The offsite contribution needs to be secured through the S106 as a 'carbon offset fund'. The total is:
Shortfall (tCO2) x Cost per carbon tonne (£) x 30 (years)
176.26 x 60 x 30 = £317,268.

On-site Contribution

The proposed on-site measures have only been presented with minimal information. Consequently, further information is necessary to determine how these measures will be delivered on site and where. The following condition is also necessary:

Condition

Prior to above ground works, a detailed energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall include full details, plans and specifications of the low and zero carbon technology to be used to meet the CO2 reduction targets (as a minimum) identified in the general energy strategy (Cudd Bentley, Ver 4 28/11/2018). The assessment shall also include, where appropriate, location plans of the identified technology, heat networks and emission data (noise and/or pollutants) and roof plans (PVs). The development must be completed in accordance with the approved assessment.

Reason

To ensure the development contributes a reduction in CO2 emissions in accordance with London Plan 5.2.

(Officer Comment: The proposals fail to deliver a zero carbon scheme and refusal is therefore proposed on these grounds.)

Ecology

The ecology assessment submitted with the application shows the current derelict site to have a relatively high ecological value. Much of this value will be removed.

Previous applications acknowledged the net onsite loss and solutions were proposed offsite to the east including improved planting and enhancements to an existing pond. The proposals for off-site improvements should be reprised for this application and secured by way of S106.

Without this offsite improvement the development would result in a net reduction in ecological value and consequently would not be policy compliant. Alternative arrangements would have to be secured prior to decision making.

Notwithstanding the above, on-site measures would also be necessary although recognising these would be of little value compared to current situation onsite. These must be secured through the following condition:

Condition

Prior to above ground works, a plan showing the inclusion of biodiversity enhancement features should be submitted to and approved in writing by the Local Planning Authority. The measures shall include bird boxes, habitat walls and areas, as well landscaping that has specific wildlife properties

(e.g. nectar rich planting) as well as living walls and roofs. The development must proceed in accordance with the approved plans.

Reason

To ensure the development contributes to the incorporation of wildlife features onsite in accordance with Policy EM7 of the Local Plan Part 1.

In addition to the above it is necessary to provide a response to the following section from the Ecology Report:

"Bat surveys of T2 and reptile surveys are considered necessary in order for the LPA to validate/grant planning permission except under exceptional circumstances and conditioned method statement and stringent mitigation considered appropriate by the LPA."

This is not an accurate statement to make. In relation to T2, the ecology assessment has considered the features in the tree as having a moderate potential to support bats. However, the surrounding habitat is not considered to be optimal for bats with limited water environment and foraging areas. The requirement at planning stage is to determine whether there is a reasonable likelihood of the presence of bats and whether or not a Natural England licence would likely to be granted. In this instance the reasonable likely presence of bats in T2 is reduced by the less than optimum surrounding habitats. No information has been presented to suggest a licence would not be forthcoming even if bats were established.

In relation to reptiles, the Council agrees the land is of suitable value for reptiles. However, the presence of reptiles in numbers likely to be of significance in terms of population is reduced by the fact the site is bordered on all sides by a busy road network.

The Council believes that the offsite solution described above would be of ultimate benefit to all species that could be on or use this site.

Consequently the following condition is necessary:

Condition

Prior to clearance work on the site a detailed method statement incorporating updated survey work for reptiles and bats shall be submitted to and approved in writing by the Local Planning Authority. The method statement and survey work shall detail the likely presence of reptiles and bats and the work necessary to minimise the impact through construction and improvements offsite to enhance habitat and foraging opportunities. The development must proceed and be constructed in accordance with the approved plan.

Reason

To ensure the development contributes to the incorporation of wildlife features onsite in accordance with Policy EM7 of the Local Plan Part 1.

FLOOD AND DRAINAGE (Jan 2019)

Summary

Initial submissions made in March 2018

Hillingdon Gateway - SuDS Flows and volumes Proforma - 22.02.18

Further info in August 2018: FRA July 2018 Rev D

Surface Water Management Report July 2018 Rev G

Initial comments made and additional information submitted in September 2018:

> Hillingdon Gateway - Flood Risk Assessment - Final Flood risk assessment

> Hillingdon Gateway - Surface Water Management Report SuDS

Supporting Information
Roof Planting Plans and Sections Landscaping details

Initial comments made and additional information submitted in December 2018:

- > Hillingdon Gateway - Surface Water Management Report - Rev H Dec 18
- > Preliminary Risk Assessment (contamination). Dec 18

Comments:

SW Drainage Management report produced by Icis design limited ref. 10203.ms

The Site is in Flood Zone 1. A ground investigation report was produced by Delta-Simons in June 2015. Resting groundwater levels recorded during the return monitoring visits were between 0.90 m and 2.36 m bgl, considered representative of confined groundwater struck within the Laminated Beds. The discharge point of the surface water sewer is unknown, but it is believed to discharge to a pump station located to the south west of the site (adjacent to Freezeland Way).

The surface water sewers directly adjacent to the site are in Freezeland Way, and consist of a 300mm diameter surface water sewer running in a west to east direction, at an approximate depth of 1.40m deep (invert level 34.05m AOD), and a 600mm - 750mm diameter foul water sewer running in a west to east direction at an approximate depth of 4.50m (30.79m AOD).

The site equates to Overall Development Area = 24,763m² / 2.4763 ha. Site is considered greenfield. Drawing 10203-GA-600 in Appendix D shows permeable / impermeable areas and green roof areas.

The proposed rate of discharge is QMEDurban = 12.5 l/s. The applicants state that the lowest level of the development that is to be positively drained is 34.090m AOD, and therefore the level difference between the sewer and ground level is 100mm. Due to the small level difference the only alternative will be to pump the surface water to the existing surface water sewer.

Drainage

This major junction has suffered from numerous reports of flooding and the existing capacity of the Thames Water sewers is considered dubious, a CCTV survey to the Yeading Brook including to ensure the appropriate connections into the brook will be required to ensure that the system will function appropriately.

There are two sewers along Freezeland Way. The proposal appears to suggest access to one of these and not the nearest TW sewer indicated. There is no justification or information to show investigation into this additional sewer or its depth in order to help facilitate a more sustainable scheme therefore the proposals are not considered acceptable.

The SuDs Methods included suggest living roofs and although imply that rain gardens are also feasible but are not highlighted or allocated 'yes' in the feasible column. However they are shown in the design and access statement but not in the drainage design.

The proposals must not contradict each other and show the design to be implementable and feasible. The drainage design must show the most sustainable design and its feasibility. What reduction in tank size can be made through the provision of additional rain gardens and living roofs. Permeable paving was indicated to be feasible but is not shown in the potential drainage design.

Rainwater harvesting and increasing technological advances mean that rainwater harvesting can be utilised as attenuation and should be included. Please also note that Thames Water guidance is

5l/s/ha and it is expected in LBH that the normal greenfield run off rate is lower than this. There large areas of public open space particularly in the south west corner but no above ground suds provided within this space providing multi functional open space.

The management and maintenance plan for any Drainage design will need to be Incorporated in any S106.

Feedback from Hillingdon Accessibility forum 2018 suggested that improved cycling links and pedestrian links from along the A40 and the edge of the nearby allotments to the development are not all formally defined, and the development should contribute to improvements.

Widening and lowering the cycle path through to Elephant park, to provide a flood flow route into the park from Windsor Avenue to deal with wider documented flooding issues.

The nearest Green space, that services this area, that future residents of this development will need to use - Elephant Park suffers from considerable flooding as well as the wider area it services. A Flood Alleviation Scheme here is being developed to reduce this risk and a contribution to this proposed enhancement of Elephant Park for its future and the flood alleviation scheme will be required.

Th proposed surface water management remains a poor design. It is unclear why a podium development needs to provide its storage below ground rather than at the podium level creating a fall in height adequate to link with the Thames Water sewer.

RECOMMENDATION: REFUSAL

WASTE STRATEGY (Jan 2019)

A separate storage area must be provided for waste arising from the 6 commercial units. The occupiers of each commercial unit must arrange for all business waste to be collected separately from the waste arising from residential properties. Access to residential bin stores should be limited to residents only.

The bin stores for building numbers 3,4,5,6,8 & 10 are located more than 10 metres from the nearest vehicles topping point. The management company must place the bins in an agreed suitable location within 10 metres of the stopping point before 6am on scheduled collection day/s.

Collections will be undertaken directly from the bin stores for building numbers 1,2,7,9,11,& 12 on the condition that a suitable latch or clasp is installed onto the doors to allow for them to be held open during collections. Any surface over which the containers will be pulled must be smooth, free from kerbs or steps, a minimum of 2 metres wide and have a gradient of no more than 1:20.50% of the containers provided should be allocated for dry-mixed recycling.

If 1280 litre wheeled bins are used then there will be adequate capacity for the storage of waste and recycling on the site as a whole. However, the bin stores located in buildings 1,4 & 6 are not large enough to contain the waste which each building is likely to generate per week. Additional capacity should be provided for these buildings of the management company must swap bins from buildings with excess space in their bin store between collections.

HOUSING OFFICER (9-12-18)

The proposed housing mix as determined by the FVA is supported because the relatively high level of rented units are all London Affordable Rent which is set annually by the GLA and more akin to social / target rents than the old Affordable Rent which could be up to 80% of market rent. It is

however crucial that the London Affordable Rent tenure is specified in the S106.

- Option1: 153 units (35%) as affordable housing, comprising Block 5 (53 units) and 10 units of Block 4 as Shared Ownership (41%) and Blocks 6 and 7 (90 units) as London Affordable Rent (59%);

This mix of units is acceptable the GLA position is that schemes that deliver up to 35% affordable housing should be delivered without an funding. Only 59% of the units are rented against a policy requirement for 70% but the rented units are all London Affordable Rent which is more affordable than Affordable Rent or London Living Rent which is a rent to buy product.

- Option2: 174 units (40%) as affordable housing assuming grant funding of £28,000 per unit is available, comprising Block 4 (68 units) as Shared Ownership (39%) and Blocks 5 and 6 (106 units)as London Affordable Rent (61%)

This mix of units is also acceptable the GLA offers funding to Registered Providers if they can increase the level of affordable housing on a development to 40% and demonstrate they are exceeding the S106 planning obligations for affordable housing. Only 61% of the units are rented against a policy requirement for 70% but the rented units are all London Affordable Rent which is more affordable than Affordable Rent or London Living Rent which is a rent to buy product. A Registered Provider will be required to deliver 174 units or (40%) as affordable housing to secure GLA grant funding.

Both options deliver a mix of units sizes in both tenures and reasonable proportion of larger 3 bed family homes.

URBAN DESIGN AND CONSERVATION

The original submission was in August 2017 (377 units). Amendments were subsequently submitted to the original scheme in March 2018 (363 units) and August 2018 (359 units), but these two iterations have now been withdrawn and replaced with the November 2018 scheme (437 units).

The layout broadly remains unchanged and still presents the same concerns as the original 2017 submission. A meeting (workshop) was convened in October 2018 between the applicant and the Officers in order to address the fundamental outstanding concerns with the latest (and all) proposals (August 2018). And to suggest layout alternatives to mitigate the issues with the scheme, which has not fundamentally changed since the first iteration. The applicant acknowledged the issues raised and it was agreed that they would work up an alternative layout and represent in circa 2wks time. This never happened and the applicant subsequently issued the November 2018 scheme, which is basically the same layout as the original submission August 2017, but with increased density and heights, some revisions to reduce parking provision and minor increased setback from the adjacent green belt land.

It has already been conveyed to the applicant that the August 2014 scheme that the planning committee resolved to grant planning permission (subject to S106) for a lower rise scheme of 4 to 5 storeys, with a taller focal element of a 6 storey at Hillingdon Circus, is already considered a dense form of development for the site. The spacing between the blocks was more in proportion to the heights, and the relationship to the green belt is at the uppermost limits. The development had a greater range of uses, which would attract more footfall to the site that would help to resolve it's isolated 'island' condition. The proposed 4 to 9 storeys November 2018 scheme fails to address and/or integrate these salient principles into the revised proposal. Plus it greatly exceeds the height, scale and massing of the 2014 scheme, which is a concern and it is now considered that the impact of development is overbearing and incongruent with it's townscape surroundings and landscape setting.

Due to the juxtaposition in scale between the proposed 4 to 9 storeys and existing 2 to 3 storey suburban context, the proposed development will be considered as a series of 'tall buildings'. Policy and the supporting Townscape Study evidence base has clearly identified areas of Uxbridge and Hayes as the only suitable areas for tall buildings within the Borough. This site is not Uxbridge or Hayes. Plus there are prevailing sensitive contextual constraints in the form of green belt, historic assets and a strong 'Metroland' setting. Therefore, the disproportionate scale of proposed tall development is clearly unsuitable for the proposed location.

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

The August 2017 application TVIA verified views confirms the impact of the proposed four to nine storey development. It will need to be reduced to circa 4 to 5 storeys to mitigate the impact on surrounding historic assets such as Ickenham Manor and also the green belt. The existing long underhinder views in this location will now be severely impacted and intruded upon.

The November 2018 scheme does exceed the height, scale and massing of the August 2017 scheme. And greatly exceeds the August 2014 approved in principle scheme. However, the TVIA has not been updated to reflect the changes from August 2017 to November 2018. Therefore, the TVIA that the applicant is relying upon is not considered fit for purpose.

Moreover, the conclusions reached for the impact of some of the verified views are overtly positive and not a fair or balanced assessment of the impact of the 2017 scheme - let alone the 2018 revised scheme that will increase the impact further.

The submitted TVIA is very limited with regard to viewpoints. Therefore, it does not fully illustrate the extents of the impact of the proposed development. Additional viewpoints should have been explored further, if the applicant is confident the scheme is relatively low impact. Also, the views are 'jelly moulds' and not CGIs demonstrating the impact, where the development is seen looming above the townscape skyline or green belt treeline. This would have also demonstrated the 'use of sympathetic materials' that the applicant justifies to soften the proposed scale of development. However, it is not clear how the materiality works, therefore not considered successful by any means. What the application drawings does show, is the stark contrast between the proposed development and the immediate setting is clearly an abrupt transition and unresponsive to the character and setting of the immediate area, for which the development is highly visible - despite the limited commentary and overtly positive conclusions from the outdated TVIA.

What the TVIA does clearly demonstrate is that proposals above 4 to 5 storeys with disproportionate height, scale and massing and unbroken urban form, does fail to integrate with its surroundings. This further polarises the island nature of the site and its isolation from the prevailing context. Therefore, both the 2017 and 2018 schemes fail to make a positive contribution to the townscape setting. In fact, a significantly large and overbearing development will be damaging to character and setting of the area, because it will be very exposed from a number of viewpoints - well beyond the seven limited viewpoints shown in the TVIA.

The scheme proposes a circa 315m (over 1,000 feet) continuous 'wall' of development along the perimeter to the north and west that wraps around the site from the A40 to Long Lane. It is designed to reduce the impact of both these 'hostile' environments (noise and air quality) on the proposed residential uses. This 'wall' mainly comprises of the taller buildings of the proposed development, with no 'breaks' in order to maintain the 'seal' against the A40 and Long Lane. This approach may mitigate the prevailing environmental conditions. However, conversely, it creates negative externalities such as an urban form that is considered monolithic and overbearing, therefore a

negative addition to the townscape. Also, within the site, the result is a very stark and 'canyon' like residential environment that is contained by a continuous unbroken wall of development, with two very limited and narrow/controlled outlooks to the east/ southeast.

The podium central development adds to this condition, as it will effectively read as one large block from the street from a number of viewpoints. Despite appearing on plan as a series of independent blocks, with spaces in between - in reality the individual blocks will merge into one larger development mass, with recesses and projections, as they effectively occupy the voids in the foreground and background of the podium area. This is a lost opportunity to create a more open sided aspect to the development to act as a foil to the wall of development. Plus respond more to the openness of the green belt on the eastern side of the site. For this reason, the 'Park' or 'green core' concept of the proposed scheme is lost through the podium layout and the general arrangement of buildings. Also, there is no clear central amenity space of a meaningful size that is commensurate to the scale of the proposed development to warrant the term 'Park' or 'green core', which should be located in the podium area adjacent to the open landscape that bounds the site to the east and southeast.

Moreover, a single larger space would consolidate the proposed fragmented and dispersed spaces into an area that will be usable rather than residual as proposed. It is clear the spaces proposed are generated by the required separation distances between the blocks, which is considered narrow in proportion to the heights. The public realm spine is predominantly an access road that has been expanded slightly either side of the carriageway to accommodate some additional planting, parking, 'drop off' and 'turning heads'. This is a missed opportunity to provide a meaningful size amenity space ('an event) along this path that would also generate some much needed footfall and activity to area that is a 'dead end' area.

It is worth noting that 'Pulling greenery along and into the site' and 'Permeability to and from the Green Belt' were key principles of the approved in principle 2014 scheme that fostered a better relationship to the landscape context and improved the visual permeability through greater separation distances (larger gaps) between the buildings, which were at a lower scale. These are not a key considerations of the November 2018 scheme. Instead, the applicant has proposed an development footprint that is too large for the site due to the disproportionate building site coverage that results very small ground floor external areas that serves no real purpose. This will further reduce the attractiveness of this proposed environment as a place that people will wish to 'meet, greet and exchange'.

Both the 'wall of development' and 'podium area' lack active frontages and a balanced mix of uses. There is a lack of 'front doors onto street' to reinforce the residential environment. The proposed 'affordable workspaces' are small and constrained by the residential grid above. And are effectively flats in all but name, therefore could easily be converted back to residential use - which will most likely be the case, as the arrangement, layout and size is not bespoke to an identified use or flexible or large enough to accommodate a range of uses, to ensure the success of the non-residential uses that are vital to a vibrant and active public realm. A site of this size does have the opportunity to build in these essential features to ensure its success, which are key components of 'placemaking'. Therefore, it is a concern that the latest scheme lacks character and identity, which is especially important as the development will accommodate over 430 dwellings, which is a significant urban extension (growth) to the local area.

Further to this, there are large runs of dead frontage on the podium block at the street level that comprises of parking vent grills, bin and cycle stores. Podiums blocks are an opportunity to create duplex 'scissor' units with a 'front doors onto the street' at the ground level and 'backgardens' onto the 1st floor podium area. This will create much needed family housing and allow for a greater range of unit typologies within the development. However, the development is dominated by 'flats' and lacks diversification of dwelling types, which is a missed opportunity - especially for a location that is

more suitable for family accommodation than smaller sized single storey units.

Substantial removal of trees along the boundary to the north and the central area, some of which are Grade A and significant clusters of Grade B classification is a concern. If previously agreed under the 2014 permission in principle scheme, then it must be recognised that the layout and use has significantly changed since. There is no proposal for a single large footprint (supermarket store) which would to a degree justify the removal of the trees, as the large footprint is essential to house the superstore 'format'. However, the latest proposed scheme comprises of comparatively smaller footprint residential blocks, albeit significant and excessive site coverage, therefore there is scope to reconfigure the layout to accommodate the Grade A trees and clusters of Grade B trees, as part of the boundary treatment and central large amenity space required to support the proposed development. This would also support officers concerns that the development should be generally set in further from the site redline boundary.

These issues combined raise significant concerns that within the development the residential environment will feel very oppressive, due to stark nature, close proximity and large scale of the buildings, a lack of usable and recognisable openspace, the limited outlook to the surrounding area inc. green belt, and lacking in a range of uses and activities to encourage footfall, overlooking and animation of the public realm. When viewed externally, the incongruent style and materials of the buildings are completely alien to area. The severe jump in scale from suburban to urban is too immediate and lacks any architectural transition to soften the scale change. Therefore the impact is considered to be a brutal and harmful intervention into the prevailing Metroland character area and dominant green belt landscape setting.

For these reasons, the proposed scheme is unacceptable on design and conservation grounds. Therefore, it is recommended for refusal.

Internal Consultees (Additional)

HIGHWAY ENGINEER (Jan 2019)

This vacant Brownfield site in Ickenham was originally occupied by the Master Brewer Motel and Public house which consisted of 106 bedrooms, conferencing and restaurant facilities with parking for over 200 vehicles.

The site is situated on the north-eastern segment of the major 'Hillingdon Circus' signalised junction and fronts directly onto Freezeland Way. It is bounded by A437 Long Lane (north) and Freezeland Way which is a continuation of the A40 Western Avenue exit slip road.

It is located adjacent to Hillingdon London Underground (LU) train station and is served by TfL bus services, U2, U10, 697 and 698. Additionally the independent 'Oxford Tube' and X90 bus service operating to and from Central London provides a convenient sustainable transport mode. This level of public transport availability is not fully reflected within the public transport accessibility level (PTAL) rating for the site which equates to 3 and is therefore officially considered as moderate and increases dependency on the ownership and usage of the private motor transport.

In 2014, two planning applications for this site were presented to the Major Applications Planning Committee on 27th August 2014 for decision. One was an outline application for 125 (C3) residential units with a 100 car park spaces (4266/APP/2014/519) whilst the other was full application for a retail (A1) and Hotel (C1) provision with 179/19 car parking spaces respectively (4266/APP/2014/518). The Committee agreed the recommendations for approval for both applications subject to the completion of an extensive Section 106 agreement. However this process was never finalised resulting in both schemes not receiving planning consent.

Parking Provisions - C3 Residential

The 437 residential unit component of the application consists of the following:-

190 - 1 bedroom flats

177 - 2 bedroom flats

70 - 3 bedroom flats

Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP policy states that new development will only be permitted where it is in accordance with the Council's adopted parking standards.

A total of 219 on-plot residential spaces are proposed which falls within London Plan 2016 maximum standards and equates to a ratio of 0.5 spaces per dwelling. They are to be arranged at surface level, semi-basement and podium levels central to and across the site.

It is acknowledged that the Greater London Authority (GLA) have encouraged a ratio of 0.5 per flatted unit within their stage 1 referral response to the proposal. However the level of provision still falls short of Hillingdon's current adopted UDP and emerging Local Plan policies which favour a higher parking quantum given its outer London borough status and the modal choice challenges this brings.

Utilising the Hillingdon saved UDP standard, the recommended maximum quantum would be in the region of 655 spaces. However in the spirit of compromise between the regional and local parking standards and LBH advice afforded at the pre-application stages, a minimum parking ratio of 1 space per unit was recommended which equates to approximately 437 spaces in total for the residential element. This would assist in limiting undue and detrimental parking displacement onto the local highway network. It is noted that with the current scale and density as presented, the applicant has, in practise, maximised on-plot parking provisions for this scale of development with little scope to increase the proposed level of 219 for the residential component.

The proposal therefore falls short of the adopted UDP and emerging Local Plan policies which favour a higher parking provision given the site's Outer London borough status and the modal choice challenges this brings for Hillingdon's residents, both incumbent and new occupiers, who need to travel to destinations extraneous to Greater London (GL) by using convenient major road links such as the M4, M25 and A40/M40 corridors. Such travel choice by private motor car is mainly due to the expensive and inconsistent availability of public transport nodal links outside of London. This is reinforced by census data (2011) which indicates that Hillingdon exhibits one of the highest car ownership rates per household in London and a commensurate increase in this trend is anticipated since the collation of census data in 2011. The private motor vehicle would therefore be likely to remain as the main dominant mode of travel choice for many new residents by reason of need and convenience for the foreseeable future.

Notwithstanding the above, the need to encourage sustainable modal travel choice is acknowledged on a local, regional and national level hence in the spirit of compromise between the regional London Plan and local Hillingdon parking standards, an on-plot parking ratio of 1 space per dwelling has been consistently sought since early pre-application discussions in lieu of the 0.5 per unit proposed ratio which would then equate to approximately 437 spaces instead of the 219 proposed. This figure of 437 spaces is substantively below Hillingdon's maximum adopted standard requirement of a 1.5 per unit ratio which would demand 655 spaces.

When contextualising all of the above, a level of on-plot car parking provision for this site in the region of approximately 437 spaces is considered appropriate and is therefore recommended. As a consequence the proposed quantum of 219 spaces, with nominal disabled compliant parking, is considered unacceptable as there would be a heightened potential for detrimental parking displacement onto the highway network.

Irrespective of the level of on-plot parking, it would be recommended that the site address be made 'Resident Permit Restricted' in order to prevent future occupiers from obtaining parking permits for the local area if and when the adjacent Controlled Parking Zones (CPZ's) encompass the site in future. The applicant has indicated agreement to this mechanism which will help deter excess car ownership/usage from within the site. This would be secured by legal agreement under Section 106 of the Town and Country Planning Act 1990 (T&CPA 1990).

Car Club Facility

Car clubs are privately operated 'pool cars' and club members can book a car as little as an hour before use. Bookings can be made for an hour, for 2 to 3 days or longer and is therefore more economic than conventional car hire. Car clubs therefore encourage people to forego private car ownership thus promoting the sustainable transport agenda. Research has shown that car clubs have the potential to replace between 6 to 20 privately owned vehicles within catchment areas consisting of both existing and new housing stock.

To assist toward sustainable modal shift it is proposed to provide 4 car club spaces to serve the location with 3 years free membership to be provided for each dwelling upon first occupation. The provision would be monitored and reviewed on a demand led basis with bay provisions adjusted accordingly if required. This facility is welcomed and would be secured via a S106 legal agreement.

Electric Vehicle Charging Points (EVCP's)

Based on the proposed site parking quantum, the parking requirement for EVCP's in line with London Plan 2016 (LP 2016) standards for this C3 use would equate to 44 EVCPs (20%) for 'active provision' with a minimum of a further 88 spaces (40%) acting as 'passive' provision for future activation. These would be monitored and controlled within a parking management strategy (PMS) regime (to be discussed later). This arrangement is considered acceptable within the above context.

Disabled Parking

In accord with the saved UDP standard, 10% of parking spaces should be disabled compliant equating to 22. A higher quantum of 34 is proposed hence the provision is welcomed and considered acceptable in number and layout terms.

Cycle Parking

In terms of cycle parking there would be a provision of 876 secure and accessible spaces in total for residents and visitors located throughout the site, including within a 'cycle hub,' which is acceptable in format and design layout terms and the quantum conforms to and exceeds Hillingdon's saved UDP standard which would require a figure in the region of approximately 507 spaces.

Notwithstanding the above, the indicated provision of 876 is considered excessive as it is a demonstrated fact that the vast majority of larger new developments in Hillingdon do not fully utilise cycle provisions which results in large numbers of spaces remaining empty and occupying areas which could be better used for amenity or other more useful purposes. A reversion toward the saved UDP standard would therefore be considered more prudent in this regard.

The underuse can be explained by the borough's Outer London status and the travel challenges that this brings for residents who are therefore reliant, more so, on the private motor car in lieu of cycling as confirmed by census data (2011) which indicates that Hillingdon exhibits one of the highest car ownership rates per household in London.

Motorcycle/Scooter (M/S) Parking

The Council's UDP saved policy standard requires that 1 motorcycle/scooter parking space per 20 parking spaces is to be provided within new development.

Consequently there should be 18 such spaces provided in total for the site as a whole. 7 are proposed which is therefore an under-provision. The quantum deficit of 11 spaces could be accommodated within the overall cycle space parking allocation as there is an ample over-provision in this respect. A reduced cycle provision allowing space for additional M/S spaces will be considered acceptable on this premise as referenced in the previous sub-heading.

Parking Provisions - A1/A3 Retail and B1(a) Employment Use

The applicant is proposing a 3 space parking provision for the retail/office/visitor elements i.e. A1/A3 (424sqm-GIFA) and B1(a) (340m² - GIFA) uses. In accord with the LBH saved UDP standard, a combined quantum of up to 11 spaces (8 retail & 3 office) would normally be required for this level of scale.

It is reasoned that the A1/A3 use will be focal to the development and therefore predominantly pedestrian based serving new occupiers hence car borne demand is predicted to be relatively low to non-existent. On this premise there would be no parking provision for the retail component. As is it unlikely that the small scale retail element would attract any measurable extraneous custom due to its insular siting within the development which inherently discourages pass-by or pass-through traffic, the absence of parking provision is considered appropriate given this context. This would leave 3 spaces to be utilised by B1(a) office staff/visitors which conforms to the adopted parking standard. On balance the total overall parking quantum of 3 spaces would effectively be a shared provision for both the employment and residential uses as the bays would revert to pure resident/visitor use outside of working hours. For this reasoning the provisions are considered acceptable and the practical 'day to day' operation of the bays would be controlled under the proposed parking management strategy (PMS - to be discussed later).

Electric Vehicle Charging Points (EVCP's)

The parking requirement for electric vehicle charging points (EVCP) in line with London Plan 2016 (LP 2016) standards for the A1,A3 and B1 uses would demand up to 20% 'active' and 10% 'passive' provision equating to 1 space for each use. This would leave 1 space for general use by fossil fuelled vehicles.

As the initial quantum provision is already small in scale i.e. 3 spaces, it can therefore be argued that the 'active' spaces will reduce readily available on-plot parking provision as, in overall vehicle percentage terms, there are far fewer electric/hybrid cars, at present, as compared to vehicles propelled by other fuels. This could in theory restrict the use of the 'active' bays for 'non-electrified' cars as there are only 3 suggested. In reality and for this scale of development, it is anticipated that the usage of the bays would be formally managed under the PMS on a demand led basis with occupiers/visitors of electric vehicles being afforded priority use of the bays as and when. A planning condition could be applied in this instance to secure priority use however it is not recommended as it could not be enforced in practise.

Cycle Parking

In terms of cycle parking there would be a provision of 3 long stay & 10 short stay spaces with 3 long stay & 1 short stay for the A1/A3/B1 uses respectively with 10 general visitor spaces. This totals 27 spaces which conforms to Hillingdon's minimum cycle parking standards and is therefore considered acceptable. All are secure and accessible in design layout terms and are conveniently located throughout the site for residents and visitors to use.

Parking Management/Allocation Strategy (PMS)

On the premise of best controlling the mixed use profile of parking usage within the site which includes new residential, commercial and retail provisions, it is considered that the application of PMS is a key tool which helps to ensure an unhindered and functional operation for all the parking uses within the site envelope. This involves creating an internal site management regime that would enforce and oversee overall parking control on a site wide basis thus ensuring the harmonious and mutual coexistence/interplay of parking bay allocations for new residents and employees (including visitors) of the retail and commercial elements of the development. The PMS can be supported by

enforcement structures which encourage the correct use of parking places which assists in ensuring that parking demand and allocation is properly managed. The PMS should also set out the methodology behind the allocation/control of parking places for the dominant residential and less so retail/commercial element.

The applicant has indicated that an internal residents parking scheme would be the enforcement tool that would be applied to control and regulate the on-site parking mix. They also state that 'key fob' operation would be applied as a method of entry into both the main surface level and basement car parks within the site envelope which would be managed accordingly.

The site area would be separated into several parking zones which will require the purchase of a parking permit by new residents. The scheme would involve a private parking enforcement company who would administer the scheme and monitoring would be undertaken at intervals of six months for two years after scheme implementation in order to determine the effectiveness and consequences of the enforcement regime. Such monitoring would be applied within (and external to) the site in order to decipher whether any detrimental displacement impacts have been inflicted internally or specifically on surrounding public highway.

The extent of surrounding highway road network to be monitored at the aforementioned intervals, is to be secured by suitable planning condition with a contingency sum of £20,000 to be secured via legal agreement which would be used by the Council if, as a result of the findings (or separate council officer observations), highway mitigation is required. The sum would be returnable if, after the two year monitoring regime, there is no identified requirement for mitigation. The PMS would be secured by planning condition.

Traffic Impact Assessment (TIA) Methodology

Two 'industry recognised' traffic assessment tools have been applied to analyse the local and wider impacts of the proposal centred on the 'Hillingdon Circus' junction and combined with extant committed developments in the relative locality. LinSig (traffic signal analysis) & VISSIM (traffic flow simulation) modelling have therefore been applied for this purpose. In order to apply these tools, certain assumptions and parameters have been established and they are compiled below. The methodology and outcomes have been independently validated against 2017 highway network, observed demand and network performance and are supported by Transport for London (TfL).

Traffic Growth

Comparative and thorough local traffic surveys have been undertaken in 2017 and indicate a similarity with previous surveys dating back to 2010 undertaken for a prior application for the site. The apparent lack of significant change in indicative flows may be explained as traffic growth in many areas of London has in fact plateaued over recent years with a maximum growth potential, at certain locations, not exceeding 1% with many areas exhibiting no notable growth whatsoever. The applicant has therefore assumed zero growth to this point. However an influencing factor for consideration is that traffic surveys can display considerable variance from 'day to day' as extraneous factors such as congestion, drivers tolerance to delays/congestion, inclement/adverse weather conditions, sustainable modal shift, origin and destination of trips i.e. linked trips etc affect representative data. Such parameters will also change dynamically from day to day which further disfavours an accurate representation of recorded of traffic flows. Hence it is considered that, at the very least, a TEMPRO growth factor which is the industry recognised method of analysing 'year on year' traffic growth in order to ascertain best-guess estimates of future travel demand should have been applied to provide a more accurate TIA.

Committed Development

The 3 main substantive development sites which may, in conjunction with the proposed new

development, impact cumulatively on the highway network capacity are included within the modelling exercise and are listed as follows:-

- A) RAF Uxbridge - Residential-led mixed use.
- B) Housing and Retirement village in West Ruislip. (Former RAF West Ruislip site)
- C) Abbotsfield & Swakeleys School - Merger & Expansion.

Developments of a lesser scale were omitted from the analysis due to their comparatively de-minimis predicted highway impacts. Irrespective of their exclusion, there is an indication that the proposal in combination with committed development impacts will already exceed the 'acceptable' threshold of traffic increase (see latter 'Vehicular Trip Generation' sub-heading) when the above sites are taken into account.

Traffic Modelling Outcomes

In traffic capacity terms, the current baseline scenario indicates that the Hillingdon Circus signalised junction operates at and above capacity, both in the am and pm peaks thus creating undue traffic queuing and resultant congestion at the junction and surrounding road network. The proposal combined with the aforementioned committed developments would clearly exacerbate this position creating a scenario whereby the junction could potentially be inflicted with traffic levels well above operational capacity resulting in greater vehicle queue lengths and associated delays which understandably raises concern.

Such concern has already been expressed by local residents and the representative Ickenham Residents' Association. It is noted that the impacts are significantly lessened when the 'Development only' scenario is considered in isolation however the Council is duty bound to take a holistic approach by considering cumulative impacts linked to committed developments in the locality. The following chapters explore the aspect of actual 'real world end game' traffic impacts in more detail and the possible highway interventions that may be considered to improve the local road and pedestrian network for current and reasonable future demands.

It is noted that since the modelling exercise has been undertaken there have been further developments with regard to up and coming HS2 related construction activities to the north of the site and specifically related to new tunnel portal construction adjacent to Ruislip Golf course in Ickenham Road. These works would result in Hillingdon Circus being utilised as part of the main A40 Haulage Route hence imposing traffic burden. At the time of the modelling exercise, no firm detail was available regarding likely HGV movements generated by the construction however some evidence has now emerged which would indicate that a possible level of 50-100 vehicles per day compounded by general HS2 activity generated by other work sites in the borough, which would add measurable burden to the junction during and outside of peak traffic periods well into the second half of the next decade. It is considered that this level of imposition would influence the modelling work undertaken to date especially in the light of the junction running at/beyond working capacity at present.

Vehicular Trip Distribution

An even (25%) vehicle trip distribution forecast for site arrivals and departures has been applied to all of the north, east, south and westerly arms of the 'Hillingdon Circus' signalised junction within the modelling exercise. This assumption has raised some concern from the Ickenham Residents' Association who cite this percentage assumption to be an 'arbitrary assignment' and unrealistic.

As Members are aware, percentage trip assignment assumptions (based on the total predicted traffic generation) are required for traffic modelling purposes and as such are considered more as predictions rather than 100% accurate representations of actual generated trip movements post development. This 'built-in inaccuracy' is notably due to the difficulty in predicting traffic assignment

and distribution which depends on a driver's premeditated decision to drive in the first instance and many other extraneous factors such as congestion, drivers tolerance to delays/congestion, inclement/adverse weather conditions, sustainable modal shift, origin and destination of trips i.e. linked trips etc. Such parameters will also change dynamically from day to day which further disfavours accurate trip generation predictions.

On this premise and the given configuration of the highway road network, the 25% 'four-way split' percentage assumption/assignment for site arrivals is considered as realistic and therefore acceptable for modelling purposes. In terms of site departures, a more reflective figure of 33.3% should ideally be applied based on an equal 'three-way split' imposed on the north, south and west junction arms only. This is due to the 'one-way' nature of the westbound flows on the eastern arm of the junction i.e. Freezeland Way which effectively removes the option of eastbound travel on that arm.

Notwithstanding this point, such a percentage variation between site arrivals and departures does not influence the final projections i.e. uplift in traffic flows, to any measurable degree therefore it is considered that the vehicular trip distribution is relatively sound within the context of the inherent unpredictability of dynamic trip assignment as referred to above.

Traffic Generation - C3 Residential/A1 Retail/B1 Commercial

Policy AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policy requires the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

A London database of trip generation for different land uses (TRAVL) has been applied by the applicant and the combination of the highest level of trips have been chosen to illustrate the maximum likely impact on the local highway network.

It has been suggested that the 437 residential units would result in a two-way traffic generation of approximately 41 vehicle movements @ the AM peak with a figure of 70 for the PM peak. The retail and commercial together with servicing aspects are relatively insignificant generators and as a result marginally increase the above predicted figures to 54 & 85 respectively.

It is considered that the applicant has underestimated both am and pm vehicle trip generation where, on average, peak period residential activity for this scale of development is very likely to exceed 100 two-way vehicular movements hence, where applicable, a higher percentage traffic growth figure would apply as addressed under the next 'Vehicular Trip Generation' sub-heading below.

It is noted that the above predictions do not factor in any further potential trip reductions by way of modal shift toward sustainable means of travel resulting from a successful travel plan and PMS strategy discussed elsewhere within this appraisal.

Vehicular Trip Generation

On the assumption of a development opening year of 2021, a future traffic generation forecast of 5 years post development is proposed and this falls within accepted guidance parameters. The relevant traffic flow figures (measured and predicted) related to the proposal are as follows:-

A) Total base traffic flows (v/hr) thru main junction:

AM(peak)	3830
PM(peak)	3708

B) Proposed Development only (v/hr)

AM (peak)	54	uplift on total base flows
PM (peak)	85	1-2%
		2-3%

C) Committed Development only (v/hr)		uplift on total base flows
AM (peak)	229	6% **
PM (peak)	61	2%

D) Proposed & Committed Development only

	Proposed	Committed	Total Uplift on total base flows	
AM (Peak)	54	229	283	7 - 8% **
PM(Peak)	85	61	146	4%

** exceeds IHT 5% threshold

As highlighted previously, it is considered that the applicant has underestimated both am and pm peak vehicle trip generation hence, where applicable, a higher percentage traffic flow growth than depicted in the above table would be expected in reality.

The Chartered Institution of Highways and Transportation (CIHT) (formally IHT) traffic assessment guidelines (circa 1994) trip generation thresholds were traditionally recognised as appropriate guidance which would allow for an informed decision to be made on whether development impacts could be absorbed within existing highway networks with or without highway interventions i.e. mitigations. Threshold triggers of 5 and 10% development traffic uplift were established for congested and other roads respectively to establish whether mitigation measures (if achievable) could enable a proposal to be acceptable on highway grounds if these percentages were exceeded.

Although this once ubiquitous method of approach is no longer applied on a widespread basis, it is still considered as a worthwhile measure and guide for gauging the suitability or non-suitability of a proposal on highway traffic generation grounds.

In line with this approach, the 'Development only' predicted uplift on total traffic flows amounts to 3% which is considered marginal however table D indicates an overall 8-9% predicted uplift in the AM peak traffic flows when 'committed developments' are also taken into consideration which notably excludes imposition by HS2 related activity and any general 'year on year' additional traffic growth. This figure of 8-9% greatly exceeds the IHT guideline threshold which, as stated earlier, recommends a figure of up to 5% being an absorbable increase on a congested highway network without measurable detriment and need for mitigation. It is therefore apparent that the Hillingdon Circus signal installation would be overburdened, at peak times, operating at or indeed exceeding practical operational capacity. Further signal optimisation could be sought post-implementation if the proposal receives planning consent however optimisation has taken place in the past hence it is considered that little highway benefit can be achieved by this mechanism at this or any future point with or without redevelopment of the site.

In summary, unless highway mitigation and highway gain can be achieved, the proposal is considered unacceptable on traffic generation grounds. The applicant has indicated willingness in providing some highway enhancement/financial contribution in an attempt to mitigate development impacts mainly focussed on improving the pedestrian environment, public transport facilities together with highway improvements related to improving site access and egress. There are no firm remedies proposed for the specific enhancement of the junction capacity at Hillingdon Circus.

Hence although some of the proposed measures are welcomed, it is considered that proposal is still highly likely to have negative impacts upon the public highway. The following chapters appraise what has been offered to this authority in terms of mitigation in order to allow the Committee to make an informed decision on the overall proposal.

Development Footfall

It is a normal requirement for this scale of residential development to be accompanied by a Pedestrian Environment Review System (PERS) audit in order to provide an inventory of local pedestrian facilities thereby allowing an informed determination of the suitability of the local highway network to be made in order to cater for the uplift in foot traffic generated by a proposal. The applicant has provided this audit with footfall estimations arising from the proposal. 64/49 additional pedestrian movements are predicted for the am & pm peaks respectively. This is considered as an underestimation given that the overall proposal would house well in excess of 500 new residents. A possible doubling of the estimation would normally be expected. Notwithstanding this point, as is the norm, pedestrian footfall would cumulatively increase and be distributed throughout the day and evening periods so clearly any projected footfall uplift, whether it be at peak or any other time of the day, would impinge on the public realm creating additional demand on the footway infrastructure.

When reviewing the locality it is clear there are some physical deficiencies within the existing footway network and pedestrian provisions @ Hillingdon Circus. It is also apparent that there is no one perfect solution which can address all the aspirations and desires the Council has for improving the pedestrian aspect of the public realm together with improving highway capacity at the junction however the scheme proposal furnishes an opportunity for a measure of public realm infrastructure gain which would be secured by legal agreement.

Potential Pedestrian Environment & Traffic Enhancements @ Hillingdon Circus

The following appraisal encompasses the main challenges and opportunities related to an enhanced pedestrian environment together with an attempt to improve highway capacity in the form of developer financed enhancements to be secured via legal agreement.

When viewing the 'Hillingdon Circus' signal installation which includes for pedestrian movements, it is clear there are some physical deficiencies within the existing layout. It is also apparent there are competing 'in-tandem' demands between providing pedestrian related enhancement and the need to improve highway capacity. This is predominantly due to the need to balance road capacity and traffic free flow objectives with the existing and necessary pedestrian crossing provisions. The aspect of insufficient 'green time' for pedestrians has been raised by the local community and could be considered for remedy within a future signal optimisation exercise as discussed earlier.

Ideally the carriageways on the approach to the signals would benefit from some widening at certain key junction apertures to enhance road capacity as the junction is already operating at or above capacity during peak periods. There are however some existing constraints which prohibit major change and these include the existing central reservations which incorporate pedestrian facilities i.e. sheep pens on all four arms and the non-existent availability of additional public or 3rd party land which could otherwise allow for road widening.

Notably the pedestrian facilities on all four arms of the junction should be of adequate scale to properly serve their intended function which inherently compromises road capacity by reducing road widths. In short the scale of pedestrian containment within the 'sheep pens' which split the roadway on each arm and provide safe refuge for pedestrians should be of a scale which allows unhindered two-way movement for all pedestrian users.

Conversely any physical adjustment i.e. reduction in width to these 'sheep pens' in order to increase road lane size will therefore be prejudicial to the pedestrian user. This aspect is of particular concern because if this application receives consent the generated footfall will inherently increase thereby adding further demand on the existing crossing infrastructure.

Currently there is one notable 'sheep pen' that is well below recommended width standard and is sited at the junction on the Long Lane (North) arm. It is noted that historically (with reference to previous site planning applications) the Council has encouraged road widening on this particular arm of the junction. Given the already sub-standard scale of the central 'sheep pen' crossing, such an

aspiration could only be achieved by acquisition (dedication) of a slither of land on the far western flank of the proposal site envelope (alongside Long Lane) which would thereby maintain road capacity and provide a larger 'sheep pen'.

Following negotiation with the applicant on this aspect, the planning submission has indicated the creation of a new highway boundary on this western flank of the site envelope which would result in land dedication to the Council. This would assist in achieving an enhanced width of 'sheep pen' with lane realignment and is therefore welcomed. This objective would be secured via a s106 & s38 legal agreements.

The 'sheep pens' on the remaining three arms of the junction are broadly fit for purpose however the applicant has suggested some modifications to enhance pedestrian comfort which, again, will also be secured via the same S106 legal mechanism.

In traffic and pedestrian capacity terms, the optimisation of the signalised 'Hillingdon Circus' junction has already been reviewed. When considering the proposed and committed developments and HS2 related activities it is apparent that the installation would at peak times, operate at or exceed capacity as is the case at present with exacerbation resulting from the flatted proposal. The aspect of insufficient 'green time' for pedestrians has also been raised by the local community. Some further optimisation for both vehicle and pedestrian movement may be attempted if this application receives consent however as highlighted earlier, the scope for improved vehicle capacity in combination with enhanced pedestrian facilities is not expected to be realistically achievable due to iterative optimisation attempts already undertaken which can only be progressed to a finite degree in order to achieve optimal performance.

Public Transport Enhancement / Financial Contribution

To fully justify a new or improved bus service, Transport for London (TfL) criteria demands a predicted minimum of 400-500 daily passenger bus trips before such a new or revised service can be implemented and trialled. There is also a yearly 'pump prime' start up funding demand over a five year period which requires external funding. If, after that time, the above criteria is met or exceeded then TfL will fully finance the running of the service.

In order to cater for this anticipated burden on local services that the additional pedestrian footfall generated by the 'Master Brewer' proposal would impose, the Council in tandem with TfL, have required securement of a financial contribution amounting to £75,000 per annum for a period of 5 years totalling £375,000 which the applicant has accepted as an obligation. This financial contribution is most likely to facilitate a new 278 bus service which is proposed to support the forthcoming Elizabeth Line services running between Heathrow and Ruislip via Hayes and Hillingdon. At the very least, the contribution will guarantee an additional single deck bus service for both the AM and PM peaks for 5 years. This will significantly enhance bus services for the local community including residents of the proposed development and would be centred on Hillingdon Underground (HU) Metropolitan/Piccadilly Line station which is located adjacent to the development.

It has been demonstrated that HU station will only exhibit a very marginal uplift in demand which negates the justification for financial contribution towards related service enhancements.

TfL have also requested a further supplemental financial contribution toward bus priority measures such as the installation of Selective Vehicle Detection (SVD) measures on the Hillingdon Circus signal installation. SVD is a method of bus priority that allows buses to be progressed through traffic signals by prioritising their passage to improve speed and reliability for passengers. To facilitate this provision a 'one-off' financial contribution of £30,000 is required. The applicant has accepted this as an obligation.

The other prominent and independent 'Oxford Tube' and X90 bus service is a well used and

successful service provision which operates to and from Central London which provides a convenient sustainable transport mode. As outlined within the following synopsis there are improvements proposed to the westbound bus stop on Freezeland Way which entail creating a bus stop lay-by with a new bus shelter as this would assist in improving the usability and accessibility for the newly generated footfall of the development with consequential benefit to existing users.

Synopsis of Highway/ Public Transport - Interventions & Gains

As a consequence of discussions with the Council and the findings within the Transport Assessment (TA) and Pedestrian Environment Review Study (PERS) the applicant has undertaken, the following specifically identified mitigations would be secured and financed by legal agreement under Section 106 of the Town & Country Planning Act 1990 if the application receives consent:-

1. It is recommended that pedestrian and cycling crossing facilities be further investigated /improved at the Hillingdon Circus signal junction. As discussed in detail earlier within this chapter, this would involve pedestrian island and marginal road widening at the Long Lane (North) 'sheep pen' location with general modernisation across the remaining north, east and southern arms of the junction to enhance facilities for all users including cyclists.

2. An improved and revised westbound right turn filter carriageway lane from Freezeland Way into the service road fronting the site is proposed with the aim of reducing the need for westbound vehicles to navigate through the Hillingdon Circus signal installation in order to enter the site thereby limiting additional capacity burden on this main junction. The filter lane would be achieved by reducing the width of the existing grass verge in the vicinity of the existing right turn facility into the site. This is fully explored within the next chapter under 'Means of access to the site by vehicle'.

3. The entrance to the site at the south-western corner of the site envelope is suggested to form a 'gateway' into the site which would act as an extension and visual enhancement of the public realm situated within an extended site envelope which encroaches onto adopted public highway and Transport for London (TfL) land. This area of adopted land currently exhibits an expanse of relatively bland footway and 'triangular' area of grass verge. The main footways running directly alongside the carriageway would remain as adopted public highway however the remaining area leading towards the site would potentially require the 'stopping up' of public highway under section 247/252 of the T&CPA 1990 to allow for the provision of the 'gateway'. This is considered acceptable in principle as the area of land in question would be subject to betterment in both visual and usability terms by virtue of seamless merging of the public realm with the site itself.

4. In order to cater for this anticipated burden on local services that the additional pedestrian footfall would impose the Council, in tandem with TfL, have required securement of a financial contribution toward providing a new service bus provision amounting to a financial contribution of £75,000 per annum to TfL for a period of 5 years totalling £375,000. This financial contribution will facilitate a new 278 bus service which is proposed to support the new Elizabeth Line services running between Heathrow and Ruislip via Hayes and Hillingdon.

5. Bus priority measures in the form of Selective Vehicle Detection (SVD) at the signal junction would be introduced as described in the previous chapter and financed by a £30,000 contribution.

6. The footway at the existing westbound X90/'Oxford Tube' bus stop along Freezeland Road in proximity of the site would be widened to allow for a suitable bus shelter with necessary kerb adaptation to facilitate lay-by provision and mobility impaired access. This would assist in improving the usability and accessibility for the newly generated footfall of the development with consequential benefit to existing users.

7. The optimisation of the signalised 'Hillingdon Circus' junction would be further reviewed post

permission to ensure that the most appropriate signal timings are in place in order to maximise capacity and minimise vehicle queue lengths with provision for sufficient pedestrian 'green time' on each junction arm. The review will be coordinated with Transport for London as signal performance falls under their jurisdiction.

8. Improvements to the service road approach in Freezeland Way (fronting the site) would be considered subject to the findings of a Highway safety audit (to be secured by way of planning condition). This would include the introduction of a 'No-entry' prohibition at the western end of the service road in proximity of the site entrance. This would assist in avoiding potential conflicts between vehicles leaving the site egress and vehicles approaching eastbound from the signal installation.

9. A review of the surrounding highway network in terms of monitoring parking displacement within a 2 year period post-implementation would be undertaken to determine whether any undue parking related detriment has been generated by the scheme. A sum of £20,000 would be secured for remedial purposes if so required.

10. A review of the lighting and the visibility of signs and road markings at and in the vicinity of the Hillingdon Circus junction (extent of review to be agreed with the Council's Highway Authority) with implementation of works as identified.

11. A review and provision (where appropriate) of carriageway and footway resurfacing, anti-skid surfacing and general upgrade of pedestrian islands (complementing enhancements highlighted in 2) above) and road markings (extent of works to be agreed with the Council's Highway Authority).

12. Vehicle actuated speed signs and road markings are to be provided on the westbound approach in Freezeland Way in order to enforce the 30 MPH speed limit (up to a cost of £5,000).

All the above interventions would be arranged by legal agreement via S106 of the Town & Country Planning Act 1990 and subsequently, where applicable, S278 of the Highways Act 1980 with all related implementation costs being absorbed by the developer at source negating any up front financial contribution to the Council.

When taking into account the aforementioned application of the outlined Highway and Public Transport interventions/enhancements, it is acknowledged that an element of highway and public transport gain would result if the scheme were to proceed. However the overarching key concern related to overburdening the Hillingdon Circus signalled junction would not be remedied. The cumulative traffic impacts combined with the listed committed developments would therefore render the scheme unacceptable on highway grounds.

Appraisal of the Surrounding Road Network and Site Access Infrastructure

Means of access to the site by vehicle

The site envelope is served by one existing vehicular access/egress point which feeds onto a segregated slip road running parallel to the main Freezeland Way (westbound) thoroughfare which is separated by a wide median strip consisting mainly of grass verge and street furniture. Within that strip there is a 'gap' which allows westbound vehicles on Freezeland Way to enter the slip road and then access the site by turning right. This averts the need to enter the heavily trafficked signalised junction when approaching from this direction and therefore assists in reducing additional capacity burden on the signalled junction itself. Further to this aim and to ease general traffic movement into the slip road, it is proposed to modify the existing 'gap' in order to facilitate a right turn filter lane for westbound vehicles by reducing the width of the median strip and grass verge. This work would be arranged via a s278 of the Highways Act 1980 agreement with all related implementation costs being

absorbed by the developer at source negating any up front financial contribution to the Council.

For vehicles approaching from the south on Long Lane must undertake a left turn manoeuvre at the 'Hillingdon Circus' signalled junction and then a u-turn is required at the next roundabout (located due north of Hercies Road) in order to return to the signalled junction and progress through to the slip-road fronting the site envelope with subsequent entry into the site.

Vehicles approaching the main junction from the north and west can readily enter the slip road and turn left into the site once they make passage through the signalised junction.

Irrespective of the level of traffic activity, this arrangement is considered as a workable and appropriate solution to gaining access to the site.

Means of departure from the site by vehicle

All traffic leaving the site must turn left and utilise the slip road to its furthest eastern extremity where it joins the main Freezeland Way (westbound) thoroughfare. From that point onwards all vehicles will dynamically assign to their desired routes and destinations via the signalised junction.

The 'left turn only' out of the site will require the creation of a point 'No Entry' prohibition in the slip road just west of the site access to prevent 'head on' conflicts with other vehicles entering the slip road directly from the signal installation. The 'No entry' prohibition will require statutory formal processes to be undertaken in the form of the creation of legally required traffic management orders (TMO's). The costs related to this process and the required signage will again be borne by the applicant via legal agreement.

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

The internal roadways give acceptable access to the all of the allocated surface level. Podium and semi-basement level parking spaces for the residential, commercial and retail uses. It has also been demonstrated that the roadways within and adjoining the site boundary with the adopted public highway can adequately cater for service, refuse collection and emergency vehicles without hindrance by allowing such vehicles to enter and leave the site in a forward gear thereby conforming to established standards and best practice.

Designs therefore conform to the Department for Transport's' Manual for Streets' 2007 (MfS) established road layout design standards and the Institution of Structural Engineers (ISE) 'Design recommendations for multi-storey and underground car parks '(4th edition circa 2011) guidance with specific demonstration of suitability of semi-basement entrance, aisle and ramp dimensions and gradients.

The internal roads are to be speed controlled by a '20 MPH' zone which would be enforced by the internal site management regime. The latter would be supplemented by the 'in-built' speed reducing designs such as narrowing of carriageways by virtue of designated on-street parking, road curvature etc. This would clearly benefit pedestrians and cyclists within the new catchment who would also benefit from internal connectivity provisions by virtue of newly created integral pedestrian linkages incorporated within the main hub of the site which link conveniently to the external public domain.

Travel Plan - Residential and Commercial/Performance Bond Contribution

An overarching Framework Travel Plan (FTP) has been submitted in order to capture and develop both the residential and workplace elements on an area wide basis encompassing the whole site. Specific and detailed residential and workplace travel plans will emerge and inform this overarching FTP as the monitoring regime unfolds subsequent to occupation.

This approach conforms with Transport for London's (TfL's) guidelines as it addresses all good practice mechanisms necessary to achieve a modal shift away from the private motor car thereby

leading toward a sustainable personal travel mode to and from the site. The FTP represents a long term strategy for managing travel by residents, employees, visitors and delivery related activities. It supports measures that promote and support sustainable travel choices and reduce single occupancy car journeys. These measures would for example include marketing and promotion of sustainable travel modes, encouragement of car sharing etc.

Each of the new residential occupiers would receive a 'Residential Travel Pack' to promote sustainable travel by suitable means such as public transport, walking and cycling. The applicant has indicated that sustainable travel is to be promoted with provisions such as free oyster cards (with £40 credit) provided for each household upon first occupation with 1 car club bay with a 3 year free car club membership to be provided for each residential dwelling upon first occupation. Subject to demand, this level of provision would be reviewed in future years.

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

The TP would therefore be reviewed on an on-going basis with travel surveys undertaken upon occupation of the development and thereafter at years 1, 3 and 5 to monitor its effectiveness as compared to the initial survey. A monitoring report would be produced by the TPC following each survey with distribution to all relevant parties including the local authority for review.

Specific SMART percentage modal shift targets have been set which is a pre-requisite requirement under TfL guidance. Under the FTP an overall modal shift target for the reduction in single occupancy car travel linked to the site would be in the order of 3 % following the 1st year of monitoring after first residential occupation. At subsequent monitoring years 3 and 5 this figure would equate to 3% and 4% respectively. The total target would therefore amount to a 10% reduction in single occupancy private car travel over 3 years. To assist in achieving this aim, modal shift targets relating to sustainable travel modes such as walking, cycling, public transport use have broadly indicated an across the board 3% increase over a five year period.

The methodology of the FTP together with the above targets is accepted and welcomed however it is considered there is further scope to enhance the above 3% uplift target related to sustainable travel modes henceforth there would be a requirement for this to be revised and established post-permission within the full TP which would be secured under a S106 legal agreement.

Under the same legal remit, it is considered justifiable to apply a 'Performance Bond' in order to assist in ensuring the continuing success of the FTP as this would act as a clear incentive toward meeting and potentially exceeding the aforementioned agreed targets. This bond would amount to £20,000 and cover on-going monitoring costs and assist in achieving the target based performance of the FTP. If there is an unreasonable default in meeting targets then, to place matters 'back on track', the Council shall use the available monies to fund the delivery of appropriate travel plan measures.

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

A full and detailed CLP and SDP will be a requirement to be secured under planning condition given the constraints and sensitivities of the local road network. Details of the SDP have been provided within the TA and are broadly acceptable however both plans will need to be secured under planning condition in order to avoid/minimise potential detriment to the public realm.

Summary Conclusion

The highway/transport related consequences of the residentially dominant 437 residential unit flatted proposal with a small scale A1/A3 retail and B1(a-c) office component has been assessed.

The Highway Authority is concerned that the proposal -

- i) exhibits insufficient on-plot parking provisions which are likely to create undue and injudicious displaced parking on the local road network and
- ii) would impose added and unreasonable traffic burden on the local road network namely the Hillingdon Circus signalled junction which currently operates at and beyond workable capacity, contrary to policies AM14 and AM7 respectively of the Development Plan (2012).

Refusal on insufficient parking grounds and excessive vehicular traffic generation is therefore recommended.

If Members were minded to approve this application, the following highway benefits/interventions which would be secured under section 106/278 of the Town & country Planning Act 1990 and Highways Act 1980 respectively are summarised and costed (where applicable) as follows:-

- i) Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities,
- ii) Improved pedestrian and cycling facilities throughout the signalled junction.
- iii) Potential improvements to the service road approach in Freezeland Way (fronting the site).
- iv) The creation of a new public realm 'Gateway' fronting the site on Freezeland Way.
- v) A 5 year public transport contribution toward a new bus service (£375,000),
- vi) Bus priority measures (£30,000),
- vii) Enhanced bus stop provisions for the 'Oxford Tube' bus service,
- viii) Monitoring of signal optimisation @ Hillingdon Circus,
- ix) Contingency monies to remedy any parking displacement onto the public highway (£20,000),
- x) Travel Plan initiatives/incentives with a financial performance bond (£20,000),
- xi) Review of local public lighting, road signage and marking provisions,
- xii) Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable.
- xiii) Implementation of vehicle actuated speed signs (up to a cost of £5,000).

TREE AND LANDSCAPE

The vacant Master Brewer hotel site has been the subject of a number of previous applications. The current proposal has been the subject of pre-application meetings, including that held on 28/09/2018. An addendum to the D&AS was issued in November 2018. This has resulted in an increase in the number of dwellings to 437 and an increase in the area of accessible landscaping at ground level enabled by a reduction in surface level car parking.

COMMENT:

TREES: EXISTING

The site lies within the area covered by TPO 6, an old TPO which also covers the Hillingdon-owned site in the south-east corner of plot, fronting onto Freezeland Way. There are no remaining trees on the development site which are protected by the TPO. Two protected trees remain on the Council-owned land and on the boundary between the Master Brewer and Council site. An oak (grade,B3) survey ref. 4122 on the submitted trees survey, is T7 on the TPO schedule and an oak (grade B3) survey ref. 4123, is T9 on the TPO.

A tree survey by BMD, dated August 2017, has identified and assessed 105 individual trees and groups. There are six 'A' grade trees (T4050 oak, 4052 field maple, 4095 field maple, 4101 oak, 4102 lime and 4136 lime) and 55 trees are category 'B'. Of the remaining trees six are 'U' grade which should be removed in the interests of good management and the rest are 'C' grade - poor quality, of no particular merit. The tree groups are concentrated on the north and east boundary and in the centre of the site.

The tree report notes (7.1.1) that 'It is desirable to retain trees as they add maturity and structure to a

site; provide shade and amenity value, screening or acoustic barrier'.

TREES: IMPACT

The protected oak T4122 (TPO ref. T7) will be removed to facilitate the development as will all of the trees on the site except for a weeping willow T3953 (grade C1). The development relies heavily on off-site trees (outside the control of the developer) for screening and amenity, notably on the south, east and west boundaries. In spite of the importance attached to trees in the tree report, virtually all of the existing trees will be removed to accommodate the development, including the 'A' and 'B' category trees, which should be considered a constraint on development.

LANDSCAPE DESIGN

The amended masterplan and landscape design, as described in the D&AS (November 2018) has evolved and made significant improvements to the scheme in terms of car parking and access, public realm, the increase in ground level planting and potential links to the Green Belt.

Notwithstanding that, the development effectively clear fells the established trees on the site. The (approximately) 200 new trees indicated on the masterplan will take many decades to effectively replace those lost to the development and, in view of the intensity of the development (including podium planting) many trees are unlikely to reach their full potential in terms of size and life span.

The main contribution by existing trees is that provided by a single on-site 'C' grade willow (T3953) at the entrance and the various off-site trees.

Planting plans have been prepared for surface level planting, dwg. Nos. BMD.14.052.DR.201, 202, 203 and 204 (using 18-20cm and 25-30cm girth specimens) and for the roof / podium level planting, dwg. Nos. BMD.14.052.DR.205, 206, 207 and 208 (using 18-20cm girth specimens).

TVIA

This site is adjacent to the Green Belt (Freezeland Covert) to the east, across the Western Avenue/A40 corridor to the north and Hillingdon House Farm to the west. To the south North Hillingdon Local Centre is predominantly low-rise and suburban in character. The wireline viewpoints utilise summer views when existing vegetation is most effective at screening views. Even with these 'best case' views the proposed development at <9 storeys will be clearly visible from a number of the viewpoints, notably V.1 Ickenham Manor to the north, V6 Hillingdon station footbridge (west) and V.16 Freezeland Way.

RECOMMENDATION

The application is unacceptable as it fails to retain and utilise landscape features of merit (high value trees), which could selectively have been retained and incorporated within the new built environment. This is contrary to policy BE38.

ENVIRONMENTAL PROTECTION UNIT

(AIR QUALITY)

The proposed development falls within the A40/Long Lane Focus Area for air quality and contributes significantly to the high levels of pollution in the area. In addition, the air quality neutral assessment as per Mayor requirements is not neutral which requires additional mitigation measures that are quantifiable and contribute substantially to the reduction of the levels of pollution in the area.

The proposal increases emissions from associated transport by 1.93 tonnes NOx per year with an equivalent damage cost of £307, 098. It is therefore incumbent on the developer to identify and implement mitigation to reduce emissions by at least this value. This is to be achieved through the development and implementation of a Low Emission Strategy secured via a condition with text required below.

Condition Air Quality - Low Emission Strategy

No development shall commence until a low emission strategy has been submitted to and approved in writing by the Local Planning Authority . The low emission strategy shall address

- 1) the specification of the CHP as ultra low NOx emissions
- 2) show what benefits are given to development purchasers that own a Euro 5 or above or have implemented retrofitting devices that will enable compliance with such Euro standards
- 3) a travel plan for residents
- 4) an electric vehicle bay charging with a minimum of three charging points (fast charging).

The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority . The Low Emission Strategy shall have targets for emission reduction and time-scales, with pollution savings quantified, aiming at reducing 1.93 tonnes NOx per year. At the end of each calendar year an implementation plan shall be submitted for approval in writing by the local planning authority , which on approval shall be fully implemented in accordance with the details and measures so approved. The measures in the agreed scheme shall be maintained throughout the life of the development.

The Low emissions strategy shall make reference to The London Councils 'Air Quality and Planning Guidance' DEFRA Practice Guidance 3: Practice guidance on Measures to Encourage the Uptake of Low Emission Vehicles, February 2009 and Low Emission Strategies: Using the Planning System to Reduce Transport Emissions, Good Practice Guidance prepared by the Beacons Low Emission Strategies, June 2008.

Reason: - As the application site is within an Air Quality Management Area and to comply with paragraph 124 of the NPPF , policy 7.14 of the London Plan, and policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2).

Should the developer choose to enter a section 106 agreement with the Council, £307,098 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduces human exposure to nitrogen dioxide levels.

Additional Comments (21/1/2019)

a) the new Air Quality report (December 2018) does not use the same reference for the original receptors modelled and with which both GLA and Hillingdon had concerns about due to their proximity to busy roads. These are Receptors 24 and 25 facing onto the A40, placed approximately 30m and 20m (respectively) from the roadside and Receptors 26 and 27 facing onto Long Lane, placed approximately 30m and 10m (respectively) from the roadside. As we don't have the same labelling we cannot identify any improvements at this locations. Therefore the need for mechanical ventilation remains with NOx specific filters (please use the text for the mechanical ventilation condition as below - the one in your planning database is outdated and does not help in removing exceeding levels of NOx from the atmosphere - we must update that list soon).

b) the updated air quality report does not offer any mitigation measures. The application is within a Focus Area and like other major planning applications, the Local Planning Authority requires that proposals are air quality positive, contributing to reduce emissions / exposure from hazardous levels of pollution and enabling the Local Planning Authority to fulfil its LAQM duties. The proposal brings into the area additional 338 trips daily, creating additional 665 kg NOx per annum, which is prejudicing the Local Planning Authority efforts to clean up the area. Therefore a S106 contribution of £247,906 is required using 2015 NOx damage prices (attached for your reference). We have already discounted 10% due to the travel plan offered by the applicant within their Transport

Assessment and remain available for enabling the inclusion any quantifiable additional measures the applicant may wish to consider.

Please see the required conditions below.

- > Condition Air Quality - Mechanical Ventilation using NOx/NO2 removal systems
- > Air Quality - Low Emission Strategy Condition
- > Vehicular Traffic: Setting targets for, and incentivising the use of Euro VI standards
- > Travel plan for users/employees incentivised to ensure the use of sustainable modes of transport;
- > Technology: Use of low emission boilers and energy technology, including low NOx boilers
- > Emissions: The action plan must include forecasts for the emissions associated with the development and set annual reduction targets.

REASON

To ensure the development reduces and manages its air quality impacts in line with Policy EM8 of the Local Plan and 7.14 of the London Plan.

ENVIRONMENTAL PROTECTION UNIT (CONTAMINATION)

The Phase I assessment and preliminary conceptual site model (CSM) identify various contaminants (possibly associated with Made Ground) that may be present at the site. The key potential contaminants identified in the preliminary risk assessment include PAH, TPH, Metals and Sulphates. A previous report (dated 2004) identified asbestos at the site. Underground storage tank/s and a covered reservoir are shown on mapping. However, it is understood the continued presence and possible connection of these structures is unknown. Subsequent data from a Phase II investigation indicated contaminants are present, as confirmed by laboratory analyses of soil samples taken from boreholes formed during the site investigation. The updated CSM indicates Plausible Pollutant Linkages are present, therefore, recommendations within the report indicate additional investigative works are required. It is therefore recommended that conditions be placed as follows:

Proposed conditions for land affected by contamination.

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

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

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

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

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

REASON

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

ENVIRONMENTAL PROTECTION UNIT (NOISE)

I have read through the submitted documents, namely the acoustic report and have found inconsistent information with noise model mitigation scheme. (item 6.2 Mitigation is read in conjunction with Appendix C Noise Ingress Calculations and Floorplan Drawings Mark up and the marked up colour zones), It is unclear as to what mitigation scheme is being applied as the stated colour zones do not correspond.

(Officer Comment: Due to the inaccuracies of information and the proximity of the site to noise receptors, the application is recommended for refusal on noise grounds.)

ACCESS OFFICER

I refer to my memorandum dated 24th November 2017 in connection with the original August 2017 submission and the various iterations which followed. As with the previous submissions, this latest proposal appears to meet the technical considerations to meet the accessible housing standards, namely M4(2) and M4(3), as required by London Plan policy 3.8 (c) and (d).

However, detail is still lacking on the following design elements to meet London Plan policy 3.1 (Ensuring Equal Life Chances), 3.5 (Quality and Design of Housing) and 7.2 (Inclusive Environment):

1. A drop-off point for door-to-door service providers, to include large Dial-A-Ride vehicles, should be provided
2. 10% of new residential units need to meet the standards for M4(3) Category 3 - wheelchair user dwelling. The units should be interspersed throughout the development, to include all typologies and tenures.
3. 10% of Affordable Housing units would be required to satisfy the design standards for an M4(3) Wheelchair Accessible unit.
4. 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.

5. An accessible parking bay should be allocated to every M4(3) wheelchair accessible / adaptable unit.
6. All remaining units must be designed to the standards for Category 2 M4(2) Accessible and Adaptable dwellings, as set out in Approved Document M 2015.
7. The affordable units should be suitable for 'day one occupation' by a wheelchair user. These units should be designed and fitted as per the prescribed standards for a Wheelchair Accessible M4(3) unit, as set out in ADM 2015.
8. Accessibility to the podium would be via a series of ramp flights that traverse two or more flights of steps. Such an arrangement would be tortuous and potentially dangerous for wheelchair users, and particularly hazardous for blind and visually impaired people. This arrangement is particularly unacceptable.
9. Details of the materials palette, with particular attention given to the paver types to be installed in accordance with the tolerances set out in BS8300:2018.
10. The accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities. Provisions could include outdoor sound tubes, colour and lighting canopies, and other play equipment that could stimulate the olfactory senses. Inclusive play is a key requirement of any new residential development.
11. A comprehensive Design & Access Statement should support any future planning application, demonstrating how the principles of inclusive design have informed the design from the inception stage.

Conclusion: unacceptable.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

This application seeks full planning permission for a residential mixed-use development incorporating residential, retail and commercial uses. This brownfield site is located within close proximity to the services and facilities provided by North Hillingdon Local Centre as well as Public Transport Infrastructure.

The principle of comprehensive mixed-use residential-led development, incorporating some commercial use is established through strategic and local level policy. In addition, the Council's emerging Site Allocations DPD specifically promotes the redevelopment of the site for a retail-led mixed use development incorporating residential use.

The strategic planning context of the site is provided by the NPPF, London Plan (2016) and Local Plan Policy PT1.E5. Paragraphs 24 to 27 of the NPPF set out the matters to be considered in the determination of planning applications for main town centre uses, including retail. London Plan Policies 2.15 (town centres), 4.7 (retail and town centre development) and 4.8 (Supporting a successful and diverse retail sector) collectively seek to ensure that retail developments:

- Relate to the size, role and function of the centre
- sustain and enhance the vitality and viability of the centre
- follow the sequential approach to site selection
- Accommodate economic and housing growth
- support and enhance competitiveness, quality and diversity of town centres
- promote public transport and sustainable modes of travel
- contribute towards an enhanced environment.

Policy PT1.E5 (Town and Local centres) affirms the Council's commitment to improve town and neighbourhood centres across the Borough and improve public transport, walking and cycling connections whilst ensuring an appropriate level of parking is provided.

At a more site-specific level, the context is provided by Saved Policy PR23. In each case,

the planning guidance advocates a comprehensive mixed-use development on the site, which respects the scale and function of the existing Local Centre and the adjoining Green Belt.

In establishing the principle for the development, PR23 provides a framework for the type of development deemed to be acceptable. A mixed-use residential-led development with some commercial uses would be considered acceptable, provided issues of scale, density, traffic intensification and impact on the Green Belt are suitably addressed.

It is therefore considered that the size and scale of development are determining issues in terms of the scale and function of the existing Local Centre, the openness and visual amenities of the adjoining Green Belt and impact on the local road network. These issues are discussed elsewhere in this report.

Policy H4 the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) also seeks to encourage additional housing in town centres.

The supporting text states:

"The Council recognises the importance of residential accommodation in town centres as a part of the overall mix of uses which is necessary to ensure their vitality and attractiveness. Such housing offers particular advantages in terms of accessibility to town centre facilities, employment opportunities and public transport. In order to maximise the residential potential of town centre sites, residential development within them should comprise predominantly one or two-bedroom units."

London Plan Policy 3.3 (increasing housing supply) seeks to increase London's housing supply, enhance the environment, improve housing choice and affordability and to provide better accommodation for Londoners. Local Plan Policy PT1.H1 affirms the London Plan targets to deliver 4,250 new homes in the Borough from 2011 to 2021 or 6,375 dwellings up to 2026. The proposal includes 437 residential units, which will contribute towards the Council's housing supply as prescribed in the London Plan and emerging local policy.

The re-use of previously developed land in town centres for new housing in mixed use schemes is considered to be consistent with both national and local planning guidance.

Commercial Uses

National and strategic policy context seeks to promote competitive town centres. The NPPF identifies a need to enhance existing markets and where appropriate, create new ones, creating conditions where businesses can invest, expand and adapt. In addition, the growth, management and adaptation of town centres to ensure vitality should be positively promoted. This supports the London Plan's approach to assessing and bringing forward additional capacity (Policy 2.15 and Policy 4.7). The proposal supports these objectives.

The 4no. workspace units with a flexible use class to enable B1 uses are proposed to be delivered as affordable units, although no details have been submitted as to how these are to be delivered. However, in the event of an approval, details could be secured by way of a S106 agreement to provide the units at reduced rentals/peppercorn rents for small start up businesses.

With regard to emerging policy, the National Planning Policy Framework (NPPF) (2018) Paragraph 48 states that Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan the extent to

which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the NPPF. The Examination in Public commenced on the 18th May 2018 and the public examination hearings have now concluded.

Whilst there are modifications proposed to Policy SA 14 within the emerging Local Plan Part 2, it is not considered that there is an unresolved objection to the principle of inclusion of the site for mixed use redevelopment. As such, it is considered that weight may be given to SA 14. The indicative capacity of this site has increased to 250 units. Ultimately however, the final capacity should be determined by a design-led approach.

The principle of the proposed uses therefore meets the policy requirements of the adopted Development Plan, emerging local policy and the Council's objectives for the site. No objections are therefore raised to the principle of a residential led mixed use on the site.

7.02 Density of the proposed development

DENSITY

The application site has an area of 2.48 hectares. The local area is considered to represent an suburban context and has a Public Transport Accessibility Level (PTAL) of 3. 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 3, a density of between 150-250 habitable rooms per hectare and 50-95 units per hectare for this site (assuming 2.7-3.0 hr/u) can be achieved for the application site. For an urban context, Table 3.2 of the London Plan recommends a range of 70-170 u/ha or 200-450 hr/ha.

The residential density of the scheme would be 480 hr/ha or 176 units per ha which exceeds the upper limit of the indicative range within the London Plan for both a suburban or urban area. The supporting text of London Plan Policy 3.4 confirms that the density matrix should not be applied mechanically enabling account to be taken of other factors relevant to optimising potential. However, the scheme must be of exemplar design in order to be justified, and must provide the fullest contribution of affordable housing.

Although the revised level of affordable housing offered by the applicant is now policy compliant, concerns remain regarding the scale and design of the development. As set out elsewhere in this report, it is not considered that the units will have good internal and external living environment, and that the scale and layout of the proposed development is compatible with sustainable residential quality, having regard to the specific constraints of this site.

UNIT MIX

Saved Policies H4 and H5 seek to ensure a practicable mix of housing units are provided within residential schemes. One and two bedroom developments are encouraged within town centres, while larger family units are promoted elsewhere. However, in a relatively large scale residential development such as this, it would be expected to provide a range of housing types to reflect the conclusions of the Council's latest Housing Market Assessment, including larger units as part of any affordable housing offer.

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

1 bed 2 person x 190 (43.5%)
2 bed 3 person x 91 (20.8%)
2 bed 4 person x 86 (19.7%)
3 bed 5 person x 70 (16%)

This mix of units is considered appropriate for this town centre location. However, some 3 bed units may be required as part of any affordable housing offer.

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

The site does not fall within or close to a Conservation Area or Area of Special Character.

ARCHAEOLOGY

Saved Policy BE3 states that the applicant will be expected to have properly assessed and planned for the archaeological implications of their proposal. Proposals which destroy important remains will not be permitted.

The site does not fall within an Archaeological Priority Area.

An Archaeological Desk Based Assessment has been submitted in support of the application. The assessment considers the impact of the proposed redevelopment on archaeological assets and concludes that the site has generally low archaeological potential for as yet undiscovered archaeological assets and concludes that the site has generally low archaeological potential for as yet undiscovered.

Nevertheless, Historic England (GLAAS) considers that the proposed development is situated in an area where archaeological remains may be anticipated. Of particular significance is the Iron Age/Roman period, when the application site appears to have been ringed by settlement activity, as shown by recent works along Long Lane, to the north of the site, and along the corridor route for a National Grid pipeline to the south of Western Avenue. The latter investigations, in particular, found extensive archaeological deposits including evidence for landscape management, settlement and ritual activity. Also of note are the numerous medieval moated manors in the area. The proposed development may, therefore, affect remains of archaeological importance.

In this case GLAAS advise that in consideration of the nature of the development, the archaeological interest and/or practical constraints are such that a condition could provide an acceptable safeguard, requiring 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 condition attached to any consent granted under this application could secure the implementation of a programme of archaeological work, in accordance with a written scheme of investigation.

HERITAGE ASSETS

Policies BE2 and BE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) seek to preserve the setting of Scheduled Ancient Monuments and the setting of a Conservation Area. Policy BE10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that development proposals should not be detrimental to the setting of a listed building.

There will be some limited views from the vicinity of Ickenham Manor. This is a sensitive area, where public access combined with a fine group of listed buildings within a

Scheduled Ancient Monument and form part of a Conservation Area. Any development would therefore be expected to address these matters. It is not considered that the impact of the development from this view has been fully assessed.

As stated elsewhere in this report, the TVIA contains some errors and underestimates of the visual impact, particularly the views from Ickenham Manor, which are highly susceptible and the Urban Design Officer considers would suffer degradation of the landscape when properly assessed. Whilst the proposed development is not considered to represent substantial harm to these heritage assets, it is not considered that the development enhances or better reveals the significance of the designated heritage assets, in accordance with paragraph 196 of the NPPF. Whilst it is not considered to be a sustainable reason to refuse the application on these grounds, nevertheless the negative impact on Ickenham Manor reinforces officers' concerns regarding long distance views of the site, which are part of the setting of the Green Belt and open countryside.

7.04 Airport safeguarding

The former Master Brewer site lies within both the height and technical safeguarding zones surrounding RAF Northolt, being located in close proximity to the flight approach path for runway 7 and occupies the statutory height, birdstrike and technical safeguarding zones surrounding the aerodrome. This development site sits beneath a piece of protected airspace called the transitional surface and beneath the approach and take off climb for RAF Northolt. The approach, take off and transitional surfaces need to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

The Ministry of Defence (MOD) Defence Infrastructure Organisation have written to confirm that it has no safeguarding objections regarding the building heights within the application site, providing they do not exceed the maximum build heights shown on the submitted plans.

The proposed development is also within the area protecting the operation of the Instrumental Landing System (ILS) and the Precision Approach Radar (PAR) that surveys the approach to the main runway at RAF Northolt. The proposed plans do not cause any technical safeguarding concerns. However, within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.

The application site is also within the birdstrike safeguarding zone. The design drawings show there are proposals for green roofs on top of some of the buildings. The roofs, depending on the design, have the potential to attract and support nesting, hazardous birds such as gulls and other bird species. Therefore the MOD has concerns that this has the potential to increase birdstrike risk to air traffic using RAF Northolt. The MoD confirms that the submitted Bird Hazard Management Plan (BHMP) is thorough and robust and should ensure that any hazardous birds utilising the site are controlled in an appropriate and timely manner.

In the event of an approval, the MoD has also requested a condition requiring the submission of a Construction Management Strategy, which should include the details of cranes and other tall construction equipment, including the details of obstacle lighting.

Subject to compliance with the above mentioned conditions, it is not considered that the proposed development would result in increased risk to aircraft using Northolt Aerodrome, in compliance with Saved Policy A6 of the Hillingdon Local Plan: Part 2 - Saved UDP

Policies (November 2012).

7.05 Impact on the green belt

Policy BE36 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) states that areas sensitive to high buildings or structures will only be permitted if they will not mar the skyline, intrude unacceptably into important local views or interfere with aviation or navigation. The site is adjacent to areas to the east, west and north, which are sensitive to high buildings, as defined in figure 5 of the UDP.

Policy OL5 states that development adjacent or conspicuous from the Green Belt will only be permitted if it would not injure the visual amenities of the Green belt, by reason of siting, materials, design, traffic or activities generated. This is reflected in the NPPF, which advises that the visual amenities of the Green Belt should not be injured by development conspicuous from it of a kind that might be visually detrimental by reason of siting, materials or design.

This site is adjacent to the Green Belt (Freezeland Covert) to the east, across the Western Avenue/A40 corridor to the north and Hillingdon House Farm to the west. Whilst the site is not within the Green Belt, it does lie between two significant wedges of Green Belt countryside, and it is therefore important to ensure that the visual amenity of those areas is not detrimentally affected by the proposal.

The Urban Design Officer notes that the November 2018 scheme exceeds the height, scale and massing of the August 2017 scheme and greatly exceeds the August 2014 (approved in principle) Spenhill scheme. It is also noted that for the current application, the Townscape & Visual Impact Assessment (TVIA) has not been updated to reflect the changes from August 2017 to November 2018. Therefore, the TVIA that the applicant is relying upon is not considered fit for purpose. Moreover, the conclusions reached for the impact of some of the verified views are considered to be overtly positive and not a fair or balanced assessment of the impact of the 2017 scheme, let alone the 2018 revised scheme that will increase the impact further.

In addition, it is considered that the submitted TVIA is very limited with regard to viewpoints. Therefore, it does not fully illustrate the extent of the impact of the proposed development. It is also noted that the wireline viewpoints utilise summer views when existing vegetation is most effective at screening views. Even with these 'best case' views, the proposed development at 9 storeys will be clearly visible from a number of the viewpoints, notably from Ickenham Manor to the north, Hillingdon station footbridge (west) and Freezeland Way.

Concerns exist over the impact of the development when viewed from the east which appear to have been discounted. There are long distance views of the site, which are part of the setting of the Green Belt and open countryside when approached from the vicinity of the A40/A4180 junction. These long distance views of the site from the east are considered to be important, as they form part of the setting of the Green Belt and open countryside when approached from the vicinity of the A40/A4180 junction. The Green Belt contributes strongly to the local distinctiveness of the area and the street scene along Western Avenue. It is considered important to retain that special open, rural character, as this road provides one of the main entrances to Hillingdon. It is considered that the proposed scheme does not respect the special character and appearance of the Green Belt from this location. The concept that "Gateways" should inevitably dominate and erode the surviving green areas which link the Green Belt to the east and west of the site as this development would, is not accepted. The existing long unhindered views in this location

will now be severely impacted and intruded upon.

Overall, it is not considered that the scheme adequately protects the environment in terms of the landscape and Green Belt. It is considered that the scheme provides insufficient landscaping / screening and that the adverse visual and landscape impacts of the proposed development appear to have been underestimated. This would exacerbate the urbanizing effect of the A40 and have a detrimental impact on the visual amenities of the Green Belt. The proposals would cause visual detriment by reason of siting, materials and design, sufficient to injure the openness of the Green Belt that from the east and west, particularly as the site is located at a pinch point in the Green Belt. Despite the use of sustainable materials, due to the scale and height of the development, it is not considered that these would create their own foiling, sufficient to mitigate the harm to the Green Belt. The proposal is therefore contrary to Policies BE26, BE38, PR23 and OL5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

7.06 Environmental Impact

Phase I assessment and preliminary conceptual site model (CSM) has been submitted in support of the application. These suggest some contamination, that may be present at the site. The key potential contaminants identified in the preliminary risk assessment include PAH, TPH, Metals and Sulphates. A previous report (dated 2004) identified asbestos at the site. Subsequent data from a Phase II investigation indicated contaminants are present, as confirmed by laboratory analyses of soil samples taken from boreholes formed during the site investigation. The updated CSM indicates Plausible Pollutant Linkages are present, therefore, recommendations within the report indicate additional investigative works are required.

In light of the findings of the site investigations and advice from EPU, had the application been acceptable in other respects, a condition would have been recommended, requiring a written method statement providing details of a remediation scheme and how the completion of the remedial works will be verified, along with details of a watching brief to address undiscovered contamination. In addition, the site may require imported top soil for landscaping purposes and a condition would have been recommended to ensure the imported soils are independently tested, to ensure they are suitable for use.

On the basis of the above, it is considered that the impact of the development on ground contamination can be mitigated, to the extent that refusal of the application on these grounds would not be justified, in accordance with Policy OE11 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) and the ground condition and contamination policies set out in the NPPF, London Plan and the Hillingdon Local Plan Part 1.

7.07 Impact on the character & appearance of the area

Policies BE13 and BE19 states that the Local Planning Authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area. Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. Policy BE35 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) requires major development adjacent and visible from the A40 to be of a high standard of design. Policy BE36 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) states that areas sensitive to high buildings or structures will only be permitted if they will not mar the skyline, intrude unacceptably into important local views or interfere with aviation or navigation. This is carried forward in emerging policy DMHB 10: High Buildings and Structures.

In terms of urban design, site specific policy PR23 requires development to be of a form of architecture and design which maintains a satisfactory relationship with nearby residential properties, Hillingdon Circus, the Green Belt and surroundings from which it is prominent. Policy BE35 requires major development adjacent and visible from the A40 to be of a high standard of design. Policy BE13 requires the layout and appearance of development to harmonise with existing street scene or other important features of the area,

Policies 7.4 and 7.6 of the London Plan (2016) and chapter 7 of the National Planning Policy Framework (2018) stipulate that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future.

In addition, architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Concerns relate to the scale, mass, appearance and strident contrast of the development primarily in relation to its immediate surroundings but also with regards to its effect on the adjoining countryside. As set out below, it is considered that the proposed development would, due to its size, scale and mass, completely overwhelm its smaller scale suburban surroundings.

The urban character of the site and that of Hillingdon Circus needs to be tempered with that of the suburban residential area adjoining in North Hillingdon and Ickenham to the north, together with the openness of the Green Belt that adjoins to the east; indeed where the site forms a pinch point in the Green Belt. An appropriate scheme of redevelopment needs to be integrated in a way that brings environmental improvements to the whole environment of the Circus and not merely the site itself.

It should be noted that this planning committee resolved in 2014 to grant planning permission (subject to S106) for a lower rise scheme of 4 to 5 storeys, with a taller focal element of a 6 storey at Hillingdon Circus (the Spenhill scheme). The spacing between the blocks was more in proportion to the heights, and the relationship to the Green Belt at the uppermost limits. It is considered that this current 4 to 9 storeys (November 2018) scheme fails to address and/or integrate these salient principles into the revised proposal and greatly exceeds the height, scale and massing of the 2014 scheme and it is now considered that the impact of development is overbearing and incongruent with its townscape surroundings and landscape setting.

The scheme proposes a 315m continuous 'wall' of development along the perimeter to the north and west that wraps around the site from the A40 to Long Lane. It is stated by the applicants that it has been designed to reduce the impact of the prevailing hostile noise and air quality environments on the proposed residential uses. This continuous ribbon of development, comprising Blocks 1 through 7 mainly comprises of the taller buildings of the proposed development, with no 'breaks' in order to maintain the seal against the A40 and Long Lane.

The outer walls of the development would rise up dramatically above the existing buildings on the south side of Hillingdon Circus to the extent that they would appear completely out of scale and overbearing. The presence of the 9 storey tower blocks, contributes to a development that would completely overwhelm its immediate surroundings. The development currently under consideration would break the skyline where at present there

are uninterrupted views of Harrow. Its presence would mar the skyline and be intrusive where uninterrupted views are less common and more valued. The size of the development and its unrelieved northern and western facades positioned relatively close to the site boundary's and relative to the footpath along Long Lane compounds the scale of the development and the potential harsh canyon like pedestrian environment at ground level.

Due to the juxtaposition in scale between the proposed 4 to 9 storeys and existing 2 to 3 storey suburban context, the proposed development will be considered as a series of tall buildings. Existing and emerging policy and the supporting Townscape Study evidence base has clearly identified areas of Uxbridge and Hayes as the only suitable areas for tall buildings within the Borough. This site is not Uxbridge or Hayes. High buildings and structures are defined as those that are substantially taller than their surroundings, causing a significant change to the skyline. The site is not identified as an area appropriate for a 9 storey building.

The Urban Design Officer notes that there are prevailing sensitive contextual constraints in the form of Green Belt, historic assets and a strong 'Metroland' setting. Therefore, the disproportionate scale of proposed tall development is clearly unsuitable for the proposed location. The current scheme is not considered to be proportionate to the scale of the local centre, but more in keeping with the scale of a metropolitan or regional centre. In addition, doubts are raised regarding the suitability and success of relying on cosmetic screening to reduce the visual impact of such a large development.

Overall, it is considered that the development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, constitutes an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the adjoining Green Belt and would mar the skyline, contrary to Policies OL3, OL5, OL26, BE13, BE19, BE21, BE26, BE38, OE1 and PR23 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Policies 7.4 and 7.6 of the London Plan (2016), the Council's Supplementary Planning Guidance "Design Guide - Residential Layouts and House Design", and the 1990 Planning Brief for site, entitled 'A40 Western Avenue, Land at Hillingdon Circus'

7.08 Impact on neighbours

Policy BE20 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will seek to ensure that buildings are laid out so that adequate daylight, sunlight and amenities of existing houses are safeguarded. Policy BE21 of the Hillingdon Local Plan: Part 2 - 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 supporting text to Policies BE20 and BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states 'that while some proposals of substantial width, height and depth, may not cause loss of amenity by reason of daylight or sunlight, these may nonetheless still be over-dominant in relation to the adjoining property and/or its private amenity space. This in turn can result in a depressing outlook detracting from residential amenity'.

The Council's Supplementary Planning Document 'Hillingdon Designand Access Statement' (HDAS) 'Residential Layouts' 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 but generally 15m would be the minimum acceptable separation distance.

In this case there are no residential properties that directly abut the site. The nearest residential properties are in Freezland Way opposite. Blocks 11 and 12, would maintain a separation distance of least 115 metres from existing properties on the south side of Freezland Way. It is not therefore considered that the proposal would result in an over dominant form of development which would detract from the amenities of neighbouring occupiers, in compliance with policy BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

Similarly, it is not considered that there would be a material loss of daylight or sunlight to neighbouring properties, as the proposed buildings would be sited a sufficient distance away from adjoining properties. It is also considered given its layout that there will be a good level of day lighting for the proposed development. The proposal is considered to be consistent with Policy BE20 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and relevant design guidance.

Privacy

Policy BE24 of the Hillingdon Local Plan: Part 2 - 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.

The Council's HDAS also provides further guidance in respect of privacy, stating in particular that the distance between habitable room windows should not be less than 21m. The Council's HDAS at paragraph 4.12 states that 'new residential development should be designed so as to ensure adequate privacy for its occupants and that of the adjoining residential property from windows above ground floor, an angle of 45 degrees each side of the normal is assumed in determining facing, overlooking distances'. This requirement has been adhered to so as to respect the residential amenity of existing residents.

The nearest residential properties are in Freezland Way opposite, which are over 100 metres from the proposed development. It is considered that the relevant minimum overlooking distances can be achieved, as the proposed building would be sited a sufficient distance away from adjoining properties. In addition, boundary treatment is could be secured by condition.

It is not therefore considered that the proposal would result in a loss of residential amenity to the nearest residential occupiers, in compliance with policies BE 20, BE21 and BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

It should be noted that the southernmost blocks (11 and 12) have been set back a minimum of 12.5 metres from the southern boundary with the Council owned land to the south of the application site, adjoining Freezland Way. Should a similar residential development on the Council land be forthcoming, with a similar setback from the common

boundary, then adequate separation distances could be achieved to ensure there is no adverse impact on residential amenity of future occupiers of both sites. As such, it is not considered that the development potential of the adjoining Council Land would be prejudiced by the current proposals.

7.09 Living conditions for future occupiers

EXTERNAL AMENITY SPACE

Policy BE23 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) requires the provision of external amenity space, sufficient to protect the amenity of the occupants of the proposed and surrounding buildings and which is usable in terms of its shape and siting. The Council's SPD Residential Layouts specifies shared amenity space for flats and maisonettes:

- 1 bedroom flat - 20m² per flat
- 2 bedroom flat - 25m² per flat
- 3 bedroom flat - 30m² per flat

Given the current proposed unit mix, 10,325 m² of external amenity space would be required. The revised scheme proposes 566 sq.m of private amenity space and 13,176m² of communal amenity space. Therefore collectively a total of 13,742 sq.m is proposed, which represents an overprovision of 3,417 sq.m in quantitative terms, when compared to relevant policy standards.

In terms of the quality of the external amenity space, the applicant submits that the revised design maintains the principles set out in the original concept of a centralised green core that provides connection to the adjacent areas. Hard amenity spaces are provided throughout the development in the form of the Urban Square, Courtyard Spaces and shared surface streets. Ground floor dwellings will also have private amenity space adjacent to their property defined by a formal balustrade and structural hedge planting. This space will also include the provision for private cycle parking.

However, it should be noted that this green core has now been raised to a podium level, with connection maintained through a series of steps and ramps. The 'Park' or 'green core' concept of the original scheme is lost through the podium layout and the general arrangement of buildings. Also, there is no clear central amenity space of a meaningful size that is commensurate to the scale of the proposed development to warrant the term 'Park' or 'green core',

The Urban Design Officer considers that a single larger space would consolidate the proposed fragmented and dispersed spaces into an area that would be usable rather than residual as proposed. It is clear the spaces proposed are generated by the required separation distances between the blocks, which are considered narrow in proportion to their heights. The public realm spine is predominantly an access road that has been expanded slightly either side of the carriageway to accommodate some additional planting, parking, 'drop off' and 'turning heads'. rather than a meaningful size amenity space along this path, that would also generate some much needed footfall and activity to an area that is a dead frontage.

Both formal and informal designated play areas are provided within these amenity spaces, as well as in other key locations throughout the site. Informal play provision has been located along the length of the Green Core and within the northern courtyard spaces, whilst a more robust, formal approach to play has been proposed in specific areas within the Green Core. Using the 'SPG play space requirement calculator' which allocates a GLA

benchmark of 10m² of dedicated play space per child, a total of 1,680 m² play space is required. The scheme provides 2,077m² of dedicated play space in accordance with relevant guidelines.

Whilst not a sustainable reason to refuse this application, it is considered that the proposed external amenity provision is a lost opportunity to create a more open aspect, commensurate to the scale of the proposed development. Overall, the amenity space provided is considered acceptable in quantitative terms, in compliance with the Hillingdon Design and Accessibility Statement (HDAS) Residential Layouts and Saved Policy BE23 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

INTERNAL SPACE STANDARDS

Policy 3.5 of the London Plan requires new development to be of the highest quality both internally and externally. Table 3.3 of the London Plan, together with the Mayor's Housing Standards and National Space Standards set out the internal size requirements for residential accommodation.

The Schedule of Accommodation demonstrates that:

- All the one bedroom units meet or exceed the minimum of 51 sq. m for a one bedroom, 2 person, single storey dwelling;
- All the two bedroom units meet or exceed the minimum of 61 sq.m for a two bedroom, 3 person, single storey dwelling, and the minimum of 70 sq.m for a two bedroom, 4 person, single storey dwelling
- All three bedroom units are in excess of the minimum 86 sq. m requirement for a three bedroom, 5 person, single storey dwelling, or 93 sq m over 2 storeys.

The proposed development therefore accords with relevant policy requirements on internal space standards and succeeds in providing a range and mix of unit sizes, including some three bedroom units, to help meet the requirement for family housing in the borough.

It is considered that the information in the submitted plans and documentation, including the planning statement and design and access statement illustrate that standards could be achieved, in accordance with London Plan Policy 3.8 and the Council's Supplementary Planning Document "Accessible Hillingdon" adopted January 2010.

OUTLOOK AND LIGHT

It is considered that the daylight and sunlight compliance levels for the proposals are high, and therefore the proposed development is acceptable on daylight/sunlight grounds. Each of the units are considered to benefit from a reasonable level of outlook and light, in compliance with Policy BE20 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), HDAS: Residential Layouts and the provisions of the London Plan.

PRIVACY

Saved Policy BE24 states that the design of new buildings should protect the privacy of occupiers and their neighbours. A minimum separation distance of 21 metres is required to avoid overlooking and loss of privacy. It has been demonstrated that the design of the development meets these separation distances and would protect the privacy of future occupiers, in accordance with Policy BE24 of the Hillingdon Local Plan: Part 2 -Saved UDP Policies (November 2012) and relevant design guidance.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The National Planning Policy Framework (NPPF) states that plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people; and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The NPPF also states that developments should be located and designed where practical to give priority to pedestrian and cycle movements; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.

Local requirements in relation to impacts on traffic demand, safety and congestion are set out in Policy AM7 of the Hillingdon Local Plan: Part Two - Saved Unitary Development Plan Policies (November 2012) which states:

The LPA will not grant permission for developments whose traffic generation is likely to:

- (i) unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network, or
- (ii) prejudice the free flow of traffic or conditions of general highway or pedestrian safety

Policy AM14 states that new development will only be permitted where it is in accordance with the Council's adopted Car Parking Standards.

Policy 6.3 of the London Plan requires development proposals to ensure that the impacts on transport capacity and the transport network are fully assessed.

TfL is the highway authority for A40 Western Avenue, while Hillingdon Council is responsible for the rest of the road network in this area. TfL buses operate on Long Lane.

A Transport Assessment (TA) and related technical addendums have been submitted in support of this application. The supporting Transport Assessment considers the impact of the proposed redevelopment of the site on the local highway and concludes that along with proposed highways works, sufficient capacity exists to support the proposals. The accompanying Travel and Framework Plans identify the various measures proposed as part of the application to encourage sustainable patterns of movement.

The Highway Engineer has conducted an extensive review of the TA which is included in the 'Internal Consultees' section of this report.

ACCESS

Pedestrian

A Pedestrian Environment Review System (PERS) audit has been submitted 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, to cater for the uplift in foot traffic generated by a proposal. 64 and 69 additional pedestrian movements are predicted for the am and pm peaks respectively. The Highway Engineer considers this to be an underestimation, given that the overall proposal would accommodate well in excess of 500 new residents and therefore considers a doubling of the estimation would be a more realistic figure.

Clearly, pedestrian footfall generated by the proposal would cumulatively increase and be distributed throughout the day and evening periods. The Highway Engineer notes that any

projected footfall uplift, create additional demand on the surrounding footway infrastructure, whilst acknowledging that there are some physical deficiencies within the existing footway network and pedestrian provisions at Hillingdon Circus.

The main challenges and opportunities relate to creating an enhanced pedestrian environment together with improving highway capacity. The aspect of insufficient green time for pedestrians has been raised by the local community and could be considered for remedy within a future signal optimisation exercise.

The Highway Engineer considers that ideally the carriageways on the approach to the signals would benefit from some widening at certain key junction pinch points to increase road capacity as the junction is already operating at or above capacity during peak periods. There are however some existing constraints including the existing central reservations and the lack of availability of additional public or 3rd party land which could otherwise allow for road widening.

The reduction in width to the central reservations in order to increase road lane size will be prejudicial to the pedestrian user, particularly as potential footfall generated by the development will inherently increase, thereby adding further demand on the existing crossing infrastructure.

The solution would appear to be the acquisition of a slither of land on the far western flank of the proposal site envelope (alongside Long Lane) which would thereby maintain road capacity and provide a larger central reservation for pedestrians. This objective could be secured via a s106 & s38 legal agreements in the event of an approval.

The 'sheep pens' on the remaining three arms of the junction are broadly fit for purpose however the applicant has suggested some modifications to enhance pedestrian comfort which, again, could also be secured via the same S106 legal mechanism.

Means of access to the site by vehicle

Vehicular access to the proposed development is proposed via a priority junction from Freezeland Way, around 50 metres east of the Hillingdon Circus junction. The site envelope is served by one existing vehicular access/egress point which feeds onto a segregated slip road running parallel to the main Freezeland Way (westbound) thoroughfare which is separated by a wide median strip consisting mainly of grass verge and street furniture. Within that strip there is a 'gap' which allows westbound vehicles on Freezeland Way to enter the slip road and then access the site by turning right. It is proposed to modify the existing 'gap' in order to facilitate a right turn filter lane for westbound vehicles by reducing the width of the median strip and grass verge. This work would be arranged via a s278 of the Highways Act 1980 agreement in the event of an approval.

For vehicles approaching from the south on Long Lane must undertake a left turn manoeuvre at the 'Hillingdon Circus' signalled junction and then a u-turn is required at the next roundabout (located due north of Hercies Road) in order to return to the signalled junction and progress through to the slip-road fronting the site envelope with subsequent entry into the site.

Vehicles approaching the main junction from the north and west can readily enter the slip road and turn left into the site once they make passage through the signalised junction.

Irrespective of the level of traffic activity, this arrangement is considered as a workable and appropriate solution to gaining access to the site.

All traffic leaving the site must turn left and utilise the slip road to its furthest eastern extremity where it joins the main Freezeland Way (westbound) thoroughfare. The 'left turn only' out of the site will require the creation of a point 'No Entry' prohibition in the slip road just west of the site access to prevent 'head on' conflicts with other vehicles entering the slip road directly from the signal installation.

The Highway Engineer considers that the internal roadways provide acceptable access to the all of the allocated surface level, podium and semi-basement level parking spaces for the residential, commercial and retail uses. It has also been demonstrated that the roadways within and adjoining the site boundary with the adopted public highway can adequately cater for service, refuse collection and emergency vehicles without hindrance by allowing such vehicles to enter and leave the site in a forward gear.

The internal roads are to be speed controlled by a '20 MPH' zone which would be enforced by the internal site management regime. The latter would be supplemented by the 'in-built' speed reducing designs such as narrowing of carriageways by virtue of designated on-street parking, road curvature etc. to the benefit pedestrians and cyclists within the estate.

Public Transport Enhancement / Financial Contribution

In the event of an approval, in order to cater for the anticipated burden on local services that the additional pedestrian footfall generated by the proposal would impose the Council in tandem with TfL, would seek a financial contribution of £75,000 per annum for a period of 5 years totalling £375,000 which the applicant has accepted as an obligation. This financial contribution is most likely to facilitate a new 278 bus service which is proposed to support the forthcoming Elizabeth Line services running between Heathrow and Ruislip via Hayes and Hillingdon.

TfL have also requested a further financial contribution toward bus priority measures such as the installation of Selective Vehicle Detection (SVD) measures on the Hillingdon Circus signal installation. To facilitate this provision a 'one-off' financial contribution of £30,000 is required. The applicant has accepted this as an obligation.

There are improvements proposed to the westbound bus stop on Freezeland Way which entail creating a bus stop lay-by with a new bus shelter as this would assist in improving the usability and accessibility for the newly generated footfall of the development with consequential benefit to existing users.

As a consequence of discussions with the Council and the findings within the Transport Assessment (TA) and Pedestrian Environment Review Study (PERS) the applicant has undertaken, had the application been acceptable in other respects, the Highway Engineer has recommended a series of specifically identified Off Site highway Improvements / mitigation measures, to provide effective site access to the proposed development and improve junction flow, which could be secured and financed by legal agreement under Section 106 of the Town & Country Planning Act 1990, if the application receives consent.

When taking into account the aforementioned highway and public transport interventions / enhancements, Highway Engineer acknowledges that an element of highway and public transport gain would result if the scheme were to proceed. However the overarching key

concern related to over burdening the Hillingdon Circus signalled junction would not be remedied. The cumulative traffic impacts, combined with the listed committed developments would therefore render the scheme unacceptable on highway grounds. These issues are addressed below.

Traffic generation

Members will note that local residents and residents associations have raised concerns regarding increased traffic generation and congestion at Hillingdon Circus junction. The Ickenham Residents Association and Oak Farm Residents Association have provided detailed responses to the consultations, and these have been reproduced in the External Consultees section of this report. In summary their objection is that despite the assertions in the many Transport Assessments received to date, there will be an increase in traffic flows and overall queuing time due to the proposed development.

TfL is satisfied that there would not be a significant impact on the A40. Accordingly, TfL raise no objection on highways grounds. However, the Council will need to be satisfied that the proposed changes are acceptable both in terms of highway capacity and safety in relation to the Local and Strategic Road Network. The Highway Engineer has reviewed the submitted assessments as they affect the local road network controlled by the Local Highway Authority.

Traffic Growth

Comparative and thorough local traffic surveys have been undertaken in 2017 and indicate a similarity with previous surveys dating back to 2010, undertaken for a previous application for the site. The applicant has therefore assumed zero growth to this point. However, the Highway Engineer notes that traffic surveys can display considerable variance from 'day to day', and other industry recognised methods of analysing 'year on year' traffic growth should have been applied to provide a more accurate TA.

In traffic capacity terms, the current baseline scenario indicates that the Hillingdon Circus signalled junction operates at and above capacity, both in the am and pm peaks thus creating undue traffic queuing and resultant congestion at the junction and surrounding road network.

The Highway Engineer considers that the proposal, in combination with committed development impacts will already exceed the 'acceptable' threshold of traffic increase when the committed development sites are taken into account. The proposal, combined with the aforementioned committed developments would clearly exacerbate this position, creating a scenario whereby the junction could potentially be inflicted with traffic levels well above operational capacity, resulting in greater vehicle queue lengths and associated delays which understandably raises concern.

It is further noted that since the modelling exercise has been undertaken there have been further developments with regard to HS2 related construction activities to the north of the site and specifically related to new tunnel portal construction adjacent to Ruislip Golf course in Ickenham Road. These works would result in Hillingdon Circus being utilised as part of the main A40 Haulage Route, hence imposing traffic burden. At the time of the modelling exercise, no firm detail was available regarding likely HGV movements generated by the construction. However some evidence has now emerged which would indicate that a possible level of 50-100 vehicles per day compounded by general HS2 activity generated

by other work sites in the borough, which would add measurable burden to the junction during and outside of peak traffic periods, well into the second half of the next decade. The Highway Engineer suggests that this level of burden would influence the modelling work undertaken to date, especially in the light of the junction running at or beyond working capacity at present.

It has been suggested that the 437 residential units would result in a two-way traffic generation of approximately 41 vehicle movements at the AM peak with a figure of 70 for the PM peak. The retail and commercial together with servicing aspects are relatively insignificant generators and as a result marginally increase the above predicted figures to 54 & 85 respectively. The Highway Engineer considers that the applicant has underestimated both AM and PM vehicle trip generation where, on average, peak period residential activity for this scale of development is very likely to exceed 100 two-way vehicular movements. It is however noted that the above predictions do not factor in any further potential trip reductions resulting from a successful travel plan and parking management strategy discussed elsewhere within this section.

Threshold triggers of 5% and 10% development traffic uplift are established for congested and other roads respectively, to establish whether mitigation measures (if achievable) could enable a proposal to be acceptable on highway grounds if these percentages were exceeded. The 'development only' predicts an uplift on total traffic flows amounting to 3%, which is considered marginal.

However an overall 8-9% uplift is predicted in the AM peak traffic flows when committed developments are also taken into consideration. This uplift excludes imposition by HS2 related activity and any general 'year on year' additional traffic growth. This figure of 8-9% greatly exceeds the guideline threshold which recommends a figure of up to 5% being an absorbable increase on a congested highway network, without measurable detriment and need for mitigation.

The Highway Engineer considers that the proposed Hillingdon Circus signal installation would be overburdened, at peak times, operating at or indeed exceeding practical operational capacity. Further signal optimisation could be sought post-implementation, if the proposal receives planning consent. However optimisation has already taken place in the past hence it is considered that little highway benefit can be achieved by this mechanism.

In summary, unless adequate highway mitigation and highway gain can be achieved, the proposal is considered unacceptable on traffic generation grounds. The applicant has indicated willingness in providing some highway enhancement/financial contribution, in an attempt to mitigate development impacts, mainly focussed on improving the pedestrian environment, public transport facilities, together with highway improvements related to improving site access and egress. However, there are no firm remedies proposed for the specific enhancement of the junction capacity at Hillingdon Circus. Hence although some of the proposed measures are welcomed, the Highway Engineer considers that proposal is still highly likely to have negative impacts upon the public highway, contrary to Policy AM7 of the Hillingdon Local Plan: Part Two - Saved Unitary Development Plan Policies (November 2012).

PARKING

The 437 residential unit component of the application consists of the following:-
190 - 1 bedroom flats; 177 - 2 bedroom flats and 70 - 3 bedroom flats.

Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP policy states that new development will only be permitted where it is in accordance with the Council's adopted parking standards.

A total of 219 on-site residential parking spaces are proposed for 437 apartments which falls within London Plan 2016 maximum standards and equates to a ratio of 0.5 spaces per dwelling. These spaces are to be arranged at surface level, semi-basement and podium levels central to and across the site. It is noted that given the current density and revised layout proposed, there little scope to increase the proposed level of 219 for the residential component.

It is acknowledged that the Greater London Authority (GLA) has encouraged a ratio of 0.5 per unit within its stage 1 referral response. However, the level of provision still falls short of Hillingdon's current adopted UDP and emerging Local Plan policies, which favour a higher parking quantum, given its outer London borough status and the modal choice challenges this brings.

The maximum Hillingdon saved UDP standard for communal residential parking is 1.5 spaces per unit. The recommended maximum quantum would therefore be 655 spaces. However, as a compromise between the regional (London Plan) and local (LBH) parking standards and officer advice at the pre-application stages, a minimum parking ratio of 1 space per unit was recommended, which would equate to 437 spaces in total for the residential element. Although the figure of 437 spaces is substantively below Hillingdon's maximum adopted standard requirement of 655 spaces, the Highway Engineer considers that the former is appropriate and is therefore recommended. It is considered that this would assist in limiting undue and detrimental parking displacement onto the local highway network.

The proposed 219 spaces, with nominal disabled compliant parking, is considered unacceptable by the Highway Engineer, as there would be a heightened potential for detrimental parking displacement onto the highway network. The proposal therefore falls short of the adopted UDP and emerging Local Plan policies which as stated above, favour a higher parking provision given the site's outer London borough status and the modal choice challenges, given the expensive and inconsistent availability of public transport nodal links outside of London. The Highway Engineer notes that this is reinforced by census data (2011) which indicates that Hillingdon exhibits one of the highest car ownership rates per household in London. It is considered that the private motor vehicle will be likely to remain as the main dominant mode of travel choice for many new residents of the proposed development, by reason of need and convenience for the foreseeable future.

It is therefore considered that on-site car parking provision is insufficient to address the demands of the proposed development in this locality, contrary to Policy AM14, of the adopted Hillingdon Unitary Development Plan and Council's Interim Revised Parking Standards.

However, should Members be mindful to approve this scheme with the 219 on-site parking provision, the Highway Engineer recommends that the development be made 'Resident Permit Restricted' in order to prevent future occupiers from obtaining parking permits for the local area if and when the adjacent Controlled Parking Zones (CPZ's) encompass the

site in future. The applicant has indicated agreement to this mechanism which will help deter excess car ownership/usage from within the site. This could be secured by legal agreement under Section 106 of the Town and Country Planning Act 1990 in the event of an approval.

Car Club

To assist toward sustainable modal shift, it is proposed to provide 4 car club spaces to serve the location with 3 years free membership to be provided for each dwelling upon first occupation. The provision would be monitored and reviewed on a demand led basis with bay provisions adjusted accordingly if required. This facility is welcomed and could be secured via a S106 legal agreement in the event of an approval. However, it is not considered that this measure would be sufficient to address the demands of the proposed development.

Electric Vehicle Charging Points (EVCP's)

Based on the proposed site parking quantum, the parking requirement for Electric Vehicle Charging Points in line with London Plan 2016 standards for this residential use would equate to 44 (20%) for 'active provision' with a minimum of a further 88 spaces (40%) as 'passive' provision for future activation. The percentage of EVCP is considered acceptable, and could be secured by condition, in the event of an approval.

Disabled parking

In accord with the saved UDP standards, 10% of parking spaces should be disabled compliant. The percentage of disabled compliant spaces is considered acceptable, although the overall figure would be dependent on the total amount of on-site parking provided, which is considered to be insufficient.

Cycle Storage

In terms of cycle parking there would be a provision of 876 secure and accessible spaces in total for residents and visitors located throughout the site, including within a 'cycle hub,' which is considered acceptable in format and design layout terms in compliance with Saved UDP Policy AM9.

The Council's UDP saved policy standard requires that 1 motorcycle/scooter parking space per 20 parking spaces is to be provided within new development. Consequently there should be 18 such spaces provided and these could be secured by condition, in the event of an approval.

The Highway Engineer considers that the parking provision for the commercial retail, office and visitor and elements are acceptable for the practical 'day to day' operation and could be controlled under the proposed parking management strategy, in the event of an approval.

Travel Plan

An overarching Framework Travel Plan (FTP) and associated package of measures and initiatives have been submitted, to promote sustainable travel choices and reduce reliance on car-use. Since this application is recommended for refusal, a Travel Plan target

programme for modal shift is yet to be agreed. However, this could be secured as part of a S106. Agreement in the event of an approval.

Deliveries and Servicing

A swept path analysis of all required delivery and servicing vehicles has been completed. The Highway Engineer is satisfied that, all required vehicles can adequately use the internal site layout.

In the event of an approval, a full and detailed Construction Logistics Plan (CLP) and Service Delivery Plan (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

In terms of urban design, Policies BE13, BE19, BE35, BE37 and PR23 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) and Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) are considered relevant. Site specific policy PR23 requires development to be of a form of architecture and design which maintains a satisfactory relationship with nearby residential properties, Hillingdon Circus, the Green Belt and surroundings from which it is prominent.

Issues relating to impact on the Green Belt, heritage assets and character of the area have been dealt with in the relevant sections of this report, where it is concluded that the proposal, due to the scale, mass, appearance and strident contrast of the development, primarily in relation to its immediate surroundings, it is not considered to be appropriate on this site.

It is acknowledged that the present open and degraded site together with the poor quality development on adjoining land to the west, are major detractors in Hillingdon Circus's function as local shopping centre. This is made worse by the presence of a heavily engineered highway infrastructure and the domination by road traffic, resulting in a chaotic mix. The site is clearly in need of an appropriate scheme of redevelopment, bringing regeneration, vibrancy and improvements to the townscape of North Hillingdon, as recognised in the Local Plan. However these need to be integrated in a way that brings environmental improvements to the whole environment of the Circus and not merely the site itself.

As stated elsewhere in this report, the current scheme is substantially denser than the Spenhill schemes which Committee resolved to grant planning permission in 2014, subject to a s106 Agreement. This approved in principle scheme was for a lower rise scheme of 4 to 5 storeys, with a taller focal element of a 6 storey at the south west corner. The spacing between the blocks was more in proportion to their heights, and the relationship to the Green Belt. This current 4 to 9 storeys scheme greatly exceeds the density, height, scale and massing of the 2014 scheme and the Urban Design Officer considers that the impact of development is overbearing and incongruent with it's townscape surroundings and landscape setting.

The scheme proposes a continuous ribbon of development along the perimeter to the north and west. It is acknowledged that this is designed to reduce the impact of the prevailing hostile noise and air quality environments on the proposed residential uses within the site. However, it is considered that this aspect of the proposal, which includes the 9 storey tower blocks, would appear completely out of scale and overbearing and would completely overwhelm its immediate surroundings. The development would break the skyline and its

unrelieved northern and western facades positioned relatively close to the site boundary's would compound the scale of the development.

In terms of the internal layout, both the perimeter wall of development and the internal podium area lack active frontages, with a lack of front doors onto street to reinforce the residential environment. There are large runs of dead frontage on the podium block at the street level that comprises of parking vent grills, bin and cycle stores. The development is dominated by flats and lacks diversification of dwelling types, which the Urban Design Officer considers to be a missed opportunity, especially for a location that is more suitable for family accommodation than smaller sized single storey units.

The Local Planning Authority has actively engaged with the applicant both at the pre application and application stage of the planning process, in order to achieve an acceptable outcome, particularly in urban design grounds. In order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably, further guidance was offered to the applicant by officers during the processing of the application, to identify the amendments to address those elements of the scheme considered unacceptable, which the applicant chose not to implement. Refusal has therefore been recommended on urban design grounds.

SECURITY

The Metropolitan Police Crime Prevention Officer raises no objections subject to the scheme achieving Secure by Design accreditation.

7.12 Disabled access

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from direct discrimination on the basis of a protected characteristic, which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease.

The Act states that service providers should think ahead to take steps to address barriers that might impede disabled people.

The London Plan (2016) and the Mayor of London's Housing Standards require that all residential units to be built in accordance with Part M4(2) of the Building Regulations 2010 (2015 Edition) and that 10% of the units be designed and constructed in accordance with Part M4(3) of the Building Regulations 2010 (2015 Edition). In the event of an approval, appropriately worded conditions could be attached to any consent, to ensure compliance with these standards.

However, the Council's Access officer has commented that details are still lacking on some design elements to meet London Plan policy 3.1 (Ensuring Equal Life Chances), 3.5 (Quality and Design of Housing) and 7.2 (Inclusive Environment). Whilst some of the issues raised could be dealt with by way of suitably worded conditions in the event of an approval, particular concerns are raised regarding accessibility to the podium level communal garden and play space areas, which would be via a series of ramp flights that traverse two or more flights of steps. Such an arrangement would be tortuous and potentially dangerous for wheelchair users, and particularly hazardous for blind and visually impaired people. This arrangement is considered to be particularly unacceptable, and would require a fundamental re-design of the scheme to address these concerns. As such, the proposed development by reason of its design, form and layout would fail to provide

adequate access by future occupiers to the podium garden and play areas, contrary to London Plan policies 3.1, 3.5 and 7.2 and the design principles contained within the adopted Hillingdon Design and Access Statement (HDAS): Residential Layouts and Accessible Hillingdon.

7.13 Provision of affordable & special needs housing

The London Plan sets the policy framework for affordable housing delivery in London. Policies 3.10 -3.13 requires that boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes, having regard to their affordable housing targets.

The application exceeds the threshold of 10 units and above, therefore affordable housing provision by way of a S106 Legal Agreement is required. The requirement is for 35% of units to be affordable.

For the 2017, 377 unit scheme, the applicant initially offered 20% of the total units (23% of the habitable rooms) on an ex-gratia basis, assuming the scheme not being subject to any future affordable housing review mechanism. A Financial Viability Assessment (FVA) was provided by the applicant, which was reviewed by an appropriately qualified, third party, financial consultant. The affordable housing offer was considered unacceptable.

This was reiterated by the Mayor in his Stage 1 Report which stated that 20% affordable housing by unit is wholly unacceptable. No detail of tenure or mix had been provided which is fundamental to establishing the acceptability of the offer and/or the starting point for negotiation. The absence of this detail is unacceptable. The high-density residential-led redevelopment of a vacant low-value site must provide more affordable housing.

A revised affordable housing offer, comprising 2 options has been submitted for the most recent updated scheme under consideration, which seeks planning permission for the provision of 437 new homes:

- Option 1: 153 units (35%) as affordable housing, comprising Block 5 (53 units) and 10 units in Block 4 as Shared Ownership (41%) and Blocks 6 and 7 (90 units) as London Affordable Rent (59%);

This mix of units is considered acceptable. The GLA position is that schemes that deliver up to 35% affordable housing should be delivered without an funding. Only 59% of the units are rented against a policy requirement for 70%, but the rented units are all London Affordable Rent which is more affordable than Affordable Rent or London Living Rent which is a rent to buy product.

- Option 2: 174 units (40%) as affordable housing, assuming grant funding of £28,000 per unit is available, comprising Block 4 (68 units) as Shared Ownership (39%) and Blocks 5 and 6 (106 units) as London Affordable Rent (61%).

This mix of units is also considered acceptable. The GLA offers funding to Registered Providers if they can increase the level of affordable housing on a development to 40% and demonstrate they are exceeding the S106 planning obligations for affordable housing. Only 61% of the units are rented against a policy requirement for 70% but the rented units are all London Affordable Rent which is more affordable than Affordable Rent or London Living Rent which is a rent to buy product.

The Housing Officer notes that a Registered Provider will be required to deliver 174 units

or (40%) as affordable housing to secure GLA grant funding. Both options deliver a mix of units sizes in both tenures and reasonable proportion of larger 3 bed family homes.

Accordingly, the proposal would make provision for a level of affordable housing, which complies with the targets set out within the Council's development plan. The development would therefore meet policy requirements in terms of affordable housing, so long as an appropriate legal agreement were in place to secure this provision.

Given that the provision has not currently been secured by way of a legal agreement, the development as it stands would not make adequate provision of affordable housing and should be refused. However it should be noted that this issue could be addressed, were an appropriate legal agreement to be completed.

7.14 Trees, landscaping and Ecology

Hillingdon UDP (UDP) policies Pt 1.1, OL1-OL7, BE5-BE7, BE26 and BE38, and PR23 and PR24, and the planning briefs for A40 Western Avenue and Hillingdon House Farm are relevant in terms of landscape planning and the scheme. Policy PR23 in the UDP reflects the planning brief adopted in 1990 and refers to nine objectives relating to land within the Green Belt and the 'Developed Area' at Hillingdon Circus, of which the site forms part, adjacent to the Green Belt. The site is in the vicinity of the Western Avenue, A40 Area of Environmental Opportunity, to which policy OL9 applies. Emerging site specific Policy SA 14 both identify a need for development proposals in this location to reinforce and enhance the Green Belt landscape to improve its visual function.

At the strategic level, London Plan Policy 7.4 identifies that development proposals should provide a high quality design response that contributes to a positive relationship between the urban structure and natural landscape features, including the landform and topography of the area'.

The application is supported by a tree survey, arboricultural implications report and by landscaping plans covering the development.

The site is covered by tree Preservation Order No.6, which features 10 individual tree specimens and 3 groups. However only two of the trees protected by the original Tree Preservation Order remain and these are poor or justify removal. Most of the trees in the centre of the site will be removed in order to accommodate the development. However, the off-site woodland planting along the Long Lane road embankment (TfL land) will be retained. Some limited on-site hedgerows along the north, south and east boundaries will be retained. Additionally, the trees and hedgerows along the northern boundary are proposed to be managed / rejuvenated.

The current proposal has been the subject of a number of revisions, the latest (November 2018) having resulted in an increase in the number of dwellings to 437 and an increase in the area of accessible landscaping at ground level, enabled by a reduction in surface level car parking.

The Tree and Landcape Officer notes that there are no remaining trees on the development site which are protected by the TPO. However, two protected trees remain on the Council-owned land and on the boundary between the Master Brewer and Council site, one of which will need to be removed to make way for the proposed development.

The submitted tree survey identified and assessed 105 individual trees and groups. There are six 'A' grade trees 55 trees are category 'B'. Of the remaining trees six are 'U' grade

which the Landscape officer considers could be removed in the interests of good management. The rest are 'C' grade - poor quality, of no particular merit. The tree groups are concentrated on the north and east boundary and in the centre of the site. The protected oak T4122 (TPO ref. T7) will be removed to facilitate the development as will all of the trees on the site except for a weeping willow T3953 (grade C1). The main contribution by existing trees is that provided by this 'C' grade willow at the entrance and the various off-site trees.

It should be noted that the development relies heavily on off-site trees, outside the control of the developer, for screening and amenity, notably on the south, east and west boundaries. This is particularly relevant, as this site is adjacent to the Green Belt to the east, across the Western Avenue/A40 corridor to the north and Hillingdon House Farm to the west. The Tree and Landscape Officer observes that the wireline viewpoints utilise summer views when existing vegetation is most effective at screening views. Even with these 'best case' views, the proposed development at up to 9 storeys will be clearly visible from a number of the viewpoints, notably Ickenham Manor to the north, Hillingdon station footbridge (west) and Freezeland Way.

In spite of the importance attached to trees in the tree report, virtually all of the existing trees will be removed to accommodate the development, including the 'A' and 'B' category trees, which Tree and Landscape Officer considers to be a constraint on development. The latest proposed scheme comprises of comparatively smaller footprint residential blocks than the approved 'in principle' Spenhill retail scheme. Therefore, officers consider that there is scope to reconfigure the layout to accommodate the Grade A trees and clusters of Grade B trees, as part of the boundary treatment and central large amenity space required to support the proposed development. This would also support officers concerns that the development should be generally set in further from the site redline boundary, to retain existing trees.

It is acknowledged that the amended masterplan and landscape design has evolved and made improvements to the scheme in terms of car parking layout and access, public realm, the increase in ground level planting and potential links to the Green Belt. Notwithstanding that, the development effectively removes all of the established trees on the site. It should be noted here that the 200 new trees indicated on the masterplan will take many decades to effectively replace those lost to the development, and in view of the intensity of the development, including podium planting, many trees are unlikely to reach their full potential in terms of size and life span.

The tree and Landscape Officer considers that the application is unacceptable as it fails to retain and utilise landscape features of merit (high value trees), which could selectively have been retained and incorporated within the new built environment. This is contrary to policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

ECOLOGY

Saved Policy EC2 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks the promotion of nature conservation interests. Saved policy EC5 seeks the retention of features, enhancements and creation of new habitats. London Plan Policy 7.19[c] seeks ecological enhancement.

An Ecological report has been submitted in support of this application. The report documents the Phase 2 survey work for bats, Great Crested Newt, reptiles and Stag

Beetle, and includes recommendations for mitigation measures where appropriate. In relation to reptiles, officers agree that the land is of suitable value for reptiles, but acknowledge that the presence of reptiles in numbers likely to be of significance in terms of population is reduced by the fact the site is bordered on all sides by a busy road network.

The Council's Sustainability officer has reviewed the submitted ecology assessment and notes its conclusion that the current derelict site to have a relatively high ecological value. In addition, the trees in the site may be valuable for biodiversity. Sites with large expanses of trees and natural areas play an important role in ecological management. Much of this value will be removed by the development. It is not appropriate to only protect sites with protected species, which by their nature are not abundant.

Previous applications acknowledged the net on-site loss and solutions were proposed off-site, to the east, including improved planting and enhancements to an existing pond. In the event of an approval, the proposals for off-site improvements to Freezland Covert would be expected to be replicated for this application and secured by way of a S106 Agreement. Without this off-site improvement, the development would result in a net reduction in ecological value and consequently would not be policy compliant.

Notwithstanding the above, the Sustainability Officer considers that on-site measures would also be necessary, although recognising these would be of little value compared to current situation on-site. In the event of an approval, these could be secured through a suitably worded condition requiring biodiversity enhancement features, which should include bird boxes, habitat walls and areas, as well landscaping that has specific wildlife properties, in order to ensure the development contributes to the incorporation of wildlife features on-site, in accordance with Policy EM7 of the Local Plan Part 1.

In addition, in the event of an approval, the Sustainability Officer recommends a condition requiring a detailed method statement incorporating updated survey work for reptiles and bats. The method statement and survey work would need to detail the likely presence of reptiles and bats and the work necessary to minimise the impact through construction and improvements off-site to enhance habitat and foraging opportunities.

Given that the provision of off-site ecological enhancement has not currently been secured by way of a legal agreement, the development as it stands would not make adequate provision of ecological mitigation and should be refused. However it should be noted that this issue could be addressed, were an appropriate legal agreement to be completed and conditions attached to any approval.

7.15 Sustainable waste management

Policy 5.16 'Waste Net Self Sufficiency' of the London Plan (2016) sets out the Mayor's spatial policy for waste management, including the need to minimise waste and encourage recycling. This is supported by policy EM11 of the Local Plan Part 1 2012. With respect to the flats, the plans indicate bin provision on the required ratio of 1100 litre refuse and recycling bins.

With regard to collections, the Highway Engineer advises that the proposed access and road layout is suitable for the Council's refuse vehicles to enter the site in a forward gear, manoeuvre within the site and exit in a forward gear. Refuse collection points are provided for the flats, the refuse collection vehicle can manoeuvre up to / close to the various collection points.

The Council's Waste Manager notes that the bin stores located in buildings 1,4 & 6 are not

large enough to contain the waste which each building is likely to generate per week. Additional capacity would need to be provided for these buildings. It is not clear whether the additional facilities could be secured by a condition, in the event of an approval, without a redesign of the scheme, the implications of which cannot be assessed. As such, the proposed development fails to provide adequate refuse and recycling facilities for the residential element of the scheme, contrary to Policy EM11 of the Local Plan Part 1 (2012) and Policy 5.16 'Waste Net Self Sufficiency' of the London Plan (2016).

7.16 Renewable energy / Sustainability

Sustainability policy is now set out in the London Plan (2016), at Policy 5.2. Part A of the policy requires development proposals to make the fullest contribution to minimising carbon dioxide emissions by employing the hierarchy of using less energy; supplying energy efficiently; and using renewable technologies. Part B of the policy currently requires non domestic buildings to achieve a 35% improvement on building regulations 2013. This policy also requires major residential developments to achieve a zero carbon standard. However if this cannot be achieved then a cash in lieu contribution will be sought. Parts C & D of the policy require proposals to include a detailed energy assessment.

The Energy Strategy submitted with the application assesses the feasibility of incorporating other renewable energy technologies on the site. The energy assessment sets out an array of measures onsite to reduce CO2.

The Mayor in his Stage 1 report requested further information regarding the cooling demand for the nondomestic building as well as evidence on the overheating performance of buildings against extreme weather conditions. The applicant should investigate further design measures in order to reduce unwanted solar gain. In response, the applicant has provided additional information and answered queries put forward by the Greater London Authority.

As the proposed commercial and retail space are all below 500m, there is no requirement to connect to the site heat network. In order to assist with achieving the required carbon reduction for the Development it is proposed that 60% of the space heat for the commercial and retail elements are provided via the site heat network. It is proposed that 100% of the above cooling load shall be provided via air source heat pumps

The following passive measures and design strategies have been proposed to enable the building to keep cooling loads at a minimum and be protected against extreme weather conditions:

- Energy efficient lighting, such as LED, omit significantly less heat than other light fittings;
- Enhancement of building services pipework insulation to reduce heat gain from the distribution pipework;
- Improved double glazing with low G values (0.36) and shading co-efficient (0.39) to limit the effects of solar gain during extreme weather conditions;
- Energy efficient mechanical ventilation with heat recovery;
- Cooling via air source heat pumps, which is a renewable technology.

The Council's Sustainability Officer has assessed the submitted information and notes that the residential element of the scheme needs to be zero carbon, in accordance with the London Plan Policy 5.2. The Energy & Sustainability Statement shows a substantive shortfall of 55%, although the corresponding CO2 tonnage figure is inaccurate. The proposed on-site measures assessed as 45% reduction, need to be coupled with an off-site contribution, to secure the remaining 55% in order for the development to be policy compliant. The offsite contribution would need to be secured through the S106 as a 'carbon

off-set fund' amounting to £317,268, in the event of an approval.

The Sustainability Officer also considers that the proposed on-site measures have only been presented with minimal information. Consequently, further information is necessary to determine how these measures will be delivered on site and where. Had the development been acceptable in other respects, resulting in a recommendation for approval, a condition requiring a detailed energy assessment would be necessary. The assessment would need to include full details, plans and specifications of the low and zero carbon technology to be used to meet the CO2 reduction targets identified in the general energy strategy (Cudd Bentley, Ver 4 28/11/2018). The assessment would also need to include, where appropriate, location plans of the identified technology, heat networks and emission data (noise and/or pollutants) and roof plans for the PVs.

Given the lack of detailed information and that the provision of a carbon off-set contribution has not currently been secured by way of a legal agreement, the development as it stands fails to satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, contrary to Policies 5.2, 5.13 and 5.15 of the London Plan, Policy PT1.EM1 of Hillingdon Local Plan Part 1 and the NPPF. The scheme should therefore be refused on this basis.

However it should be noted that this issue might be addressed, were an appropriate legal agreement to be completed and suitably worded conditions attached to any approval. Subject to this obligation and conditions outlined above, it is considered that the scheme could have satisfactorily addressed the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, in compliance with Policies 5.2, 5.13 and 5.15 of the London Plan, Policy PT1.EM1 of Hillingdon Local Plan Part 1 and the NPPF.

7.17 Flooding or Drainage Issues

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (Adopted Nov 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. 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 application is not located within a zone at risk of flooding, however due to the size of the development it is necessary for it to demonstrate that it would incorporate sustainable drainage techniques and reduce the risk of flooding in accordance with the requirements of Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

A Flood Risk Assessment (FRA) has been submitted as part of the application and taking into consideration the principles of the NPPF and other relevant regional and local policies.

The drainage strategy would need to demonstrate the surface water run-off generated up to and including the 1 in 100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme would also need to include provision of on-site surface water storage to accommodate the critical duration 1 in 100 year storm event, with an allowance for climate change.

Since November 2013 the Environment Agency no longer provides comments where surface water flood risk is the only constraint. The FRA has therefore been examined by the Council's Flood Officer who notes that this major junction has suffered from numerous reports of flooding and the existing capacity of the Thames Water sewers is questionable.

There are two sewers along Freezland Way and the proposal appears to suggest access to one of these, although there is no justification or information to show investigation into this additional sewer or its depth, in order to help facilitate a more sustainable scheme. Therefore, this aspect of the proposed drainage strategy is not considered acceptable.

The Hillingdon LDF: Strategic Flood Risk Assessment (SFRA) states that surface water attenuation should be provided by the use of SUDS and that water recycling and rainwater harvesting could be considered as a means of reducing surface water from the site. The London Plan also requires the use of sustainable drainage systems. The drainage report acknowledges this and sets out a series of options. Some of these are considered feasible but are not elaborated upon.

The Flood Officer notes that there is a lack of consistency between the submitted SUDs information in terms of the feasibility of permeable paving, living roofs and rain gardens. Rainwater harvesting and increasing technological advances mean that this can be utilised as attenuation, resulting in a potential reduction in tank size and should be included in the proposals. The drainage strategy documents should not contradict each other and must demonstrate that the design to be implementable and feasible.

The proposed rate of discharge is 12.5 l/s. However the Flood Officer notes that Thames Water guidance is 5l/s/ha and it is expected in Hillingdon that the normal greenfield run off rate is lower than this. There are large areas of public open space particularly in the south west corner, but no above ground SUDs is provided within this space.

The applicants state that the lowest level of the development that is to be positively drained is 34.090m AOD, and therefore the level difference between the sewer and ground level is only 100mm. Due to the small level difference the only alternative will be to pump the surface water to the existing surface water sewer. However, it is unclear why a podium development needs to provide its storage below ground rather than at the podium level, creating a fall in height adequate to link with the Thames Water sewer by gravity rather than pumping.

The Flood Officer highlights a number of infrastructure improvements and a management and maintenance plan for any drainage design that will need to be incorporated in any S106 in the event of an approval. However, as the recommendation is for refusal, no agreement has been reached with the applicant in respect of all these obligations.

In light of the objections highlighted above by the Council's Flood and Drainage Officer it is considered that the scheme will have failed to satisfactorily address drainage and flood related issues, contrary to the Hillingdon Local Plan: Part 2 Policies OE7 and OE8, Policies 5.13 and 5.15 of the London Plan and the aspirations of the NPPF.

7.18 Noise or Air Quality Issues

NOISE

The Government's National Planning Policy Framework (NPPF) gives the Government's guidance on noise issues. It states that planning decisions should (i) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, and (ii) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from new development, including through the use of conditions. According to the

Government's Noise Policy Statement for England (NPSE) of March 2010, these aims should be achieved within the context of Government policy on sustainable development.

London Plan Policy 7.15 aims to reduce and manage noise to improve health and quality of life and supports the objectives of the Mayor's Ambient Noise Strategy.

Hillingdon LPP1 Policy EM8 seeks to promote the maximum possible reductions in noise levels and minimise the number of people potentially affected in target areas as identified by the Defra Noise Action Plan. Saved Policies OE1 and OE3 of the Hillingdon Local Plan Part 2 saved UDP Policies seek to protect the environment from the adverse effects of pollutants and to ensure sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable. Saved Policy OE5 states that proposals for the siting of noise sensitive developments such as family housing, where the occupiers may suffer from noise or vibration will not be permitted in areas which are, or are expected to become, subject to unacceptable levels of noise or vibration.

A revised noise report has been submitted in support of the updated scheme (November 2018). The report sets out the acoustic performance required by glazing and ventilation to meet national guidelines (BS8233) for internal noise, during the day and the night for the updated scheme.

A noise survey and assessment has been carried out. The most significant noise source affecting the site is road traffic noise from the A40 and A437 (Long Lane). To the north east of the site is RAF Northolt and to the west of the site is a railway line, although the survey shows that these affect the ambient noise levels to a lesser extent.

The noise assessment has shown potential for an adverse noise impact, and has offered mitigation which includes the provision of glazing and ventilation. The noise model indicates the range of external levels expected around the site, varying by location and by height. The noise model highlights 5 zones of external noise levels. Mitigation measures are recommended for each of the five zones identified, including measures such as glazing specification, mechanical ventilation (where necessary) and facade composition. Through the use of these measures the assessment concludes that the proposed development is capable of complying with the relevant BS8233/WHO standards.

With respect to the external amenity spaces, the assessment acknowledges that these will exceed the recommended noise level identified by BS8233. However, the applicant argues that this is not always possible to achieve and should not mean the development as a whole is unacceptable. It is noted that the design and layout of the development has evolved with continuous perimeter buildings on the western and northern boundaries, so as to reduce the impact of noise in the central zone of the site. No balconies were originally proposed facing the northern and western facades, but the floor areas of the affected flats were increased to compensate. The applicant now submits that a further detailed acoustic assessment has confirmed that the motorway noise measured along the east and west facades of these buildings (blocks 4-7) is somewhat reduced thanks to shielding effect of the masterplan form. Therefore, external balconies have been added in contrast to the previous design, which provided enlarged living areas in lieu of balconies.

The balconies are exposed to noise (even if it is reduced), but the applicant argues that residents will benefit from the relatively quiet, protected, external publicly accessible amenity space in the newly-proposed courtyards at ground level.

The report states that although it incorporates the latest changes to the proposal, as the scheme is further developed, there may be design changes, which may lead to some revision to the acoustic requirements. Therefore, the report recommends that the details of

the sound insulation scheme can be submitted to the LPA under a planning condition that can be imposed on the development, to allow development of the design, and discharged following LPA approval, prior to commencement of the relevant work on site.

The Council's Environmental Protection Unit (EPU) has reviewed the Noise Report, taking into account the revisions to the scheme. In summary, the EPU has found inconsistencies with the information for the proposed noise model mitigation scheme. The proposed mitigation for the various units does not correspond with the noise ingress calculations and floorplan drawings and the marked up colour zones. It is therefore unclear as to what mitigation scheme is being applied. As such, it is considered that the scheme fails to demonstrate that the local regional and national policy requirements can be met for the proposed development, by appropriate design or by the imposition of appropriate conditions, to ensure that satisfactory noise levels are provided inside the proposed residential dwellings and with respect of all forms of outdoor amenity space.

In summary, it is considered that the application has failed to establish that the proposed residential units can be sited, designed, insulated or otherwise protected from external noise sources to appropriate national and local standards, contrary to Policy EM8 of the Hillingdon Local Plan Part 1, Saved Policy OE5 of the Hillingdon Local Plan Part 2, Policy 7.15 of the London Plan and the NPPF

Refusal is therefore recommended on that basis.

AIR QUALITY

The proposed development is within the declared AQMA and in an area which currently appears to be close to the European Union limit value for annual mean nitrogen dioxide, and may be exceeding the EU limit value adjacent to the A40. The A40 and the areas around the junctions within Hillingdon have been identified as priority areas for improvement with regard to poor air quality.

Although officers consider that the impacts on air quality are likely to be negative, on balance, this should not automatically result in a refusal, subject to clear measures to reduce the impacts of the development. The need to provide green travel plans and contributions to public transport will assist attempts to reduce the impact of the development. In addition, in the event of an approval, conditions are considered necessary to further ensure a potential wider reduction in emissions as well as reducing the impacts to the new development

The Council's Environmental Protection Unit (EPU) notes that the proposed development falls within the A40/Long Lane Focus Area for air quality and contributes significantly to the high levels of pollution in the area. In addition, the London Plan requires additional mitigation measures that are quantifiable and contribute substantially to the reduction of the levels of pollution in the area. The submitted air quality assessment concludes that the development is air quality neutral with respect to building emissions and traffic emissions and no further mitigation measures are required. However EPU officers do not agree with this assessment. The applicant would therefore need to provide some mitigation in order to ensure the development is at least air quality neutral.

This mitigation could be in the form of a planning obligation requiring a contribution towards an air quality local action plan and/or specific measures on and along the road network affected by the proposal that reduce vehicle emissions and or reduces human exposure to

nitrogen dioxide levels. In addition, a Low Emission Strategy would need to be secured by condition, in the event of an approval.

Subject to the above mentioned conditions and planning obligations, it is considered that the impact of the development on the air quality of the area could be mitigated, to the extent that refusal of the application on these grounds would not be justified, in accordance with Policy EM8 of the Local Plan Part 1.

However, given that mitigation, in order to ensure the development is at least air quality neutral has not currently been secured by way of a legal agreement, the development as it stands fails to satisfactorily address the issues relating air quality, contrary to Policy 7.14. (Improving Air Quality) of the London Plan, Policy PT1.EM8 of Hillingdon Local Plan Part 1 and the NPPF. The scheme should therefore be refused on this basis.

7.19 Comments on Public Consultations

The original consultation was for a residential-led, mixed-use development comprising buildings between 4 and 9 storeys to provide 377 residential units (Use Class C3), plus employment and flexible commercial floor space (Use Classes A1/A3). An initial scheme revision was submitted to the Council for consideration in March 2018 in response to the comments received. A subsequent revision to the scheme was then submitted to the LPA in August 2018. In view of the August revision, this scheme was subject to a reconsultation in September 2018. However, following on-going discussions with officers of the Local Planning Authority (LPA) and the Greater London Authority, the August 2018 scheme revision was subsequently withdrawn from consideration by the applicant. In December 2018 a further consultation was carried out on a revised scheme proposing an increase in the number of units originally proposed from 377 to 437 and a reduction in parking ratio to 0.5 spaces per unit.

At the time of writing the report, overall, 126 letters or internet representations have been received objecting to the scheme. Given the recommendation for refusal and the number of objections it is not considered appropriate to address each individual objection in this section of the report.

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

At the time of writing the report, in total 20 letters or internet representations, supporting the proposals (mainly because of the need to redevelop a derelict site and the need for more houses), were received and are summarised in the preceding 'External Consultees' section of the report.

The Ickenham and Oak Farm Residents Associations and Ickenham Residents Forum have submitted detailed comments to the Council. These were assessed by Officers and the issues raised have been taken into account and addressed within the body of the report.

7.20 Planning obligations

Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) 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, including the Greater London Authority and Transport for London. The comments received indicate the need for the following contributions or planning obligations to mitigate the impacts of the development. If the application were to be considered for approval, the following broad S106 Heads of Terms would be pursued by the Council at that time:

- (i). Transport: A s278 and/or s38 agreement will be entered into to address any and all on site and off site highways works as a result of this proposal. These include the following:
 - Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities,
 - Improved pedestrian and cycling facilities throughout the signalled junction.
 - Potential improvements to the service road approach in Freezeland Way (fronting the site).
 - The creation of a new public realm 'Gateway' fronting the site on Freezeland Way.
 - Enhanced bus stop provisions for the 'Oxford Tube' bus service,
 - Monitoring of signal optimisation @ Hillingdon Circus,
 - Contingency monies to remedy any parking displacement onto the public highway (£20,000),
 - Review of local public lighting, road signage and marking provisions,
 - Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable.
 - Implementation of vehicle actuated speed signs (up to a cost of £5,000).
- (ii). Public Transport Infrastructure: A 5 year public transport contribution toward a new bus service (£375,000); Bus priority measures (£30,000),
- (iii). Travel Plan initiatives/incentives with a financial performance bond (£20,000),
- (iv). Affordable Housing: Either 153 units (35%) as affordable housing, comprising 10 units in as Shared Ownership (41%) 90 units as London Affordable Rent (59%) or 174 units (40%) as affordable housing, (assuming grant funding of £28,000 per unit is available), comprising 68 units as Shared Ownership (39%) 106 units as London Affordable Rent (61%)
- (v). None of the market housing will be occupied until 100% of the affordable housing is delivered.
- (vi). Construction Training: either a construction training scheme delivered during the construction phase of the development or a financial contribution secured equal to the formula as contained in the SPD ($\text{£2,500 for every £1m build cost} + (\text{total gross floor area}/7,200\text{m}^2 \times \text{£71,675}) = \text{total contribution}$).
- (vii). Landscape Screening and Ecological Mitigation: a financial contribution in the sum of at least £252,308.88.
- (viii). Air Quality: a financial contribution in the sum of £ £247,906 .
- (ix). Carbon Fund: a contribution of £317,268 for a carbon fund to make up for the shortfall for this development and to make it policy compliant
- (x) Parking Permit free development for all future residents
- (xi) Car Club with 3 years free membership
- (xii). Project Management and Monitoring Fee: a contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement. Contributions towards education, health, libraries and community facilities are now covered by the Hillingdon Community Infrastructure Levy.

The applicant has agreed in principle to the following proposed Heads of Terms, which could be secured by way of the S106 Agreement in the event of an approval.

- o Affordable Housing

- o Site Specific Transport Works (including Travel Plan)
- o Air Quality Improvements
- o Employment and Training Provision
- o Ecological Mitigation
- o Contribution towards improvements to adjacent Green Belt land
- o Crime

It is considered that the level of planning benefits sought in the event of an approval would be reasonable, adequate and commensurate with the scale and nature of the proposed development, in compliance with Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012). However, since the application is recommended for refusal, no agreement has been entered into with the applicant in respect of all these contributions.

7.21 Expediency of enforcement action

Not applicable.

7.22 Other Issues

None.

8. Observations of the Borough Solicitor

General

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

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

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

Planning Conditions

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

Planning Obligations

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

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable.

10. CONCLUSION

No objections are raised to the principle of a mixed use development on the site. However, the density of the proposed development falls above London Plan guidance. It is considered that the design, scale and layout of the development will fail to introduce a built form that is appropriate to its local context and character of the area and views from the neighbouring Green Belt.

It is considered that the proposed development would, due to its size, scale, siting and mass, completely overwhelm its smaller scale suburban surroundings. The disproportionate scale of proposed tall development up to 9 storeys is clearly unsuitable for the proposed location, which is not proportionate to the scale of the local centre, but more in keeping with the scale of a metropolitan or regional centre.

Whilst it is acknowledged that the site is clearly in need of an appropriate scheme of redevelopment, this needs to be integrated in a way that brings environmental improvements to the whole environment of the Circus and not merely the site itself. Officers have worked pro-actively with the applicant through extensive negotiations to address urban design issues wherever possible, both at pre-application and application stage. Notwithstanding these discussions, the scheme was ultimately considered to fail to comply with the development plan for the reasons identified in this report.

It is not considered that the scheme adequately protects the environment in terms of the landscape and Green Belt. The scheme provides insufficient landscaping / screening and the adverse visual and landscape impacts of the proposed development appear to have been underestimated. The proposals would cause visual detriment by reason of siting, height and design, sufficient to injure the openness of the Green Belt that runs in close from the east and west, particularly as the site is located at a pinch point in the Green Belt. In addition, the application is unacceptable as it fails to retain and utilise landscape

features of merit (high value trees), which could selectively have been retained and incorporated within the new built environment.

It terms of transportation impacts, Insufficient on-site parking is proposed, which is likely to result in displaced parking on the surrounding local road network , whilst the development would impose added and unreasonable traffic burden on the local road network namely the Hillingdon Circus signalled junction which currently operates at and beyond workable capacity.

It is considered that the scheme falls short of the required emissions reduction target in carbon dioxide emissions and has also failed to satisfactorily addressed drainage and flood related issues.

Whilst the proposed development would generally provide acceptable living conditions in terms of space standards for all of the proposed units and protect the residential amenity of surrounding occupiers, in terms of outlook, privacy and light, concerns are raised regarding regarding accessibility and noise levels within the development.

Since planning obligations have not currently been secured by way of a legal agreement, the development as it stands fails to satisfactorily addressed the issues relating off-site highways works, public transport, travel plans, construction training, ecological mitigation, affordable housing, air quality and project management and monitoring.

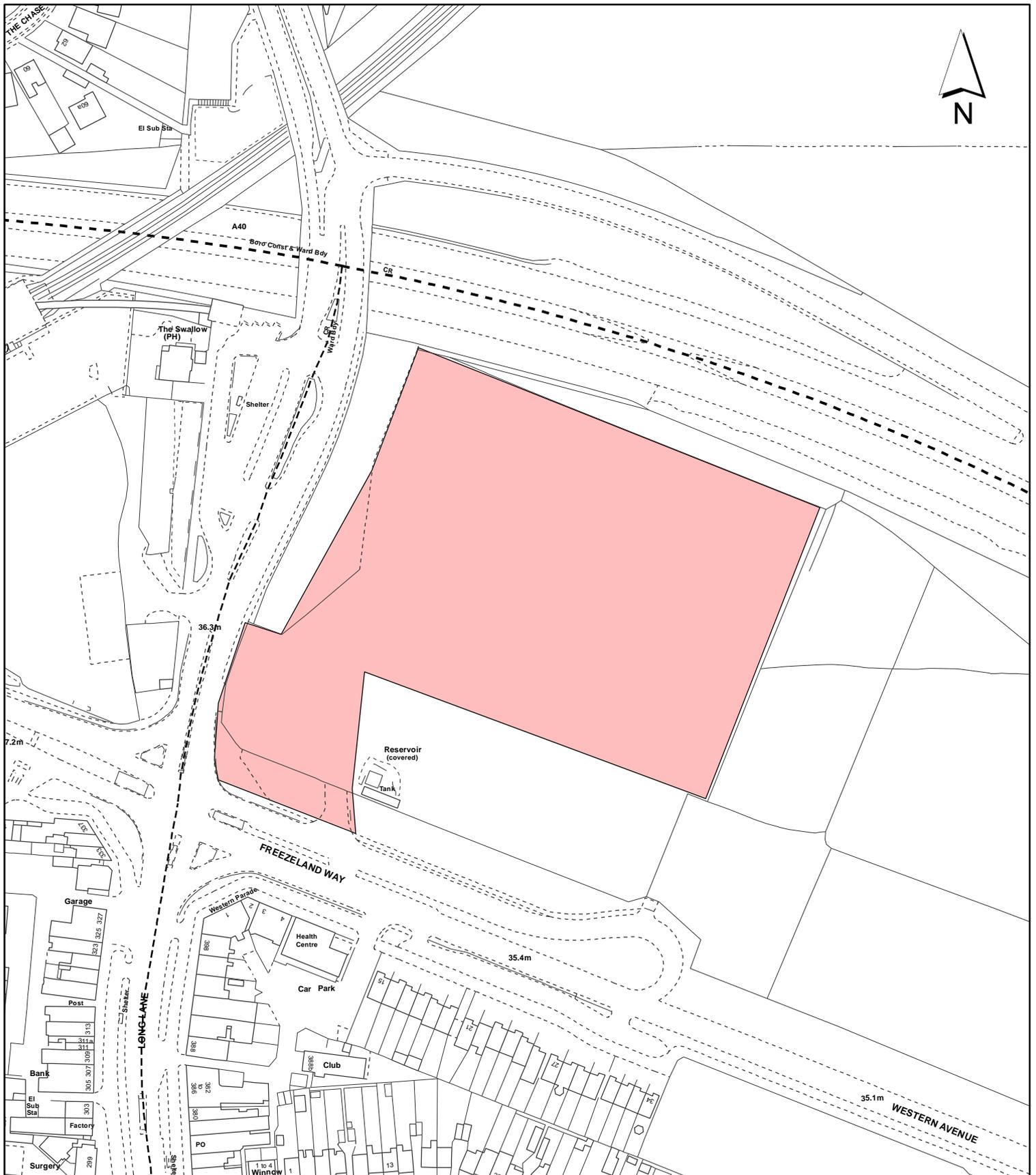
The application is being recommended for refusal on this basis.

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

Contact Officer: Karl Dafe

Telephone No: 01895 250230



Notes:

 Site boundary

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Site Address:

Master Brewer

LONDON BOROUGH OF HILLINGDON
 Residents Services
 Planning Section
 Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 250111

Planning Application Ref:
4266/APP/2017/3183

Scale:
1:2,000

Planning Committee:
Major

Date:
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