

Report of the Head of Planning, Transportation and Regeneration

Address WATERCRESS BEDS SPRINGWELL LANE HAREFIELD

Development: Change of use of site to a camping site (Use Class D2), alteration of existing building to provide visitors' centre, erection of seven camping pods, associated landscaping and car parking with 18 spaces.

LBH Ref Nos: 24597/APP/2018/2373

Drawing Nos: GA1004
GA2001
GA2000
GA1000
GA1003
GA1002
GA1001
Flood Risk & SUDS Assessment with appendices A-E
Arboricultural Impact Assessment and Tree Protection Survey
Preliminary Ecological Appraisal and Bat Roost Assessment
Sustainability Statement
Transport Statement
Design & Access Statement

Date Plans Received: 26/06/2018 **Date(s) of Amendment(s):**
Date Application Valid: 05/11/2018

1. SUMMARY

Planning permission is sought for the change of use of the site known as Watercress Beds, Springwell Lane to a camping (or 'Glamping' site) Use Class D2.

Overall the development would result in an increase of built footprint of approx. 127sqm. The footprint of the visitors centre would be 328sqm which is considered excessive for the proposed use. Furthermore the height of visitors centre would be approx. 5.3m which is unjustified for a single storey building. In addition to the size of the visitors centre, the planning application seeks permission for seven 'glamping pods' and change of use of the whole site to D2 campsite and so the unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents could result in excessive visual clutter to the detriment of the overall appearance of the site.

Given the overall size of the visitors centre and the potential for further visual clutter, the development is considered to have an unacceptable impact on the openness of the greenbelt.

Residential use on the site

There are two residential properties on the site with at least one not currently benefiting from planning permission and all are included within the red line. Although these properties fall within the red line plan, no reference to these properties has been made within the current application. Because no information has been submitted a full assessment is not possible. However, it is considered that these properties would contribute cumulatively to

encroachment into the Green Belt and would have a negative impact on the openness of the Green Belt when assessed alongside the proposed visitors centre and 'glamping pods'.

Flood risk:

The site is shown to be a dry island surrounded by Flood Zone 3 of the River Colne. The proposed development has failed to provide an adequate Flood Emergency Plan. Furthermore the FRA does not provide sufficient information to demonstrate that surface water runoff from the site will not increase as a result of the proposed development or that the location and height of proposed pods are above the modelled flood water levels.

The site is located within Source Protection Zone (SPZ) 1 and upon a principal aquifer (with the secondary aquifer in hydraulic continuity with the Principal aquifer). In light of this the proposed development has failed to provide a Preliminary Risk Assessment (PRA) to address the possible risk to controlled waters and has submitted insufficient information on the proposed drainage scheme to determine risks to potable water supplies *SPZ 1.

The proposed development therefore raises significant issues with regards to surface water run off, flood risk and risk to human safety and has failed to address the possible risk to controlled waters and potable water supplies.

Biomass Boiler

The proposed plans include a biomass boiler within the the visitors centre. No details of the likely emissions has been submitted as part of this application and so it is not possible to make a proper assessment of the likely impacts. However, previous use of a biomass boiler on site has generated objections to this proposal on the basis that the smoke generated meant some neighbouring properties could not open their windows. Based on the information provided and the concerns raised regarding the biomass boiler and the proximity of nearby residents it is considered that the proposal could lead to an unacceptable impact on the amenity of neighbouring residents.

Highways and parking

The existing land use on the site is not clear. The most recent permission is that for use as a garden centre which included on-site parking for 28 cars. However, it is clear that the garden centre has not been operational for some time and despite enforcement action and appeals, the permitted use is still unclear. TfL have objected to the level of on site car parking proposed. The Council's highways team have raised no objection to the scheme. However, as the planning application seeks change of use of the whole site to D2 campsite concerns have been raised by local residents regarding the unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents which could result in more vehicular activity than expected. Furthermore the biomass boiler may generate further trips as would the storage of wood, vehicles and equipment related to the biomass boiler use.

On balance it is considered that the application provides insufficient evidence and data regarding both the existing and proposed use and therefore existing car parking and trip generation cannot be used to determine whether the proposals would have a negative impact on local transportation and highway compared to the existing use. On this basis the proposal is considered unacceptable as insufficient information has been provided.

For the reasons set out above, it is recommended that the application be refused.

2. **RECOMMENDATION**

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The proposal for the change of use of this site with associated fixed and movable structures, car parking ancillary camping and retention of unauthorised residential properties, provision of a biomass boiler and any open storage that falls within the red line (but does not feature within the applicants description of development) would cumulatively constitute inappropriate development in the Green Belt which would be detrimental to its character and openness whilst conflicting with the purposes of including land within it. The proposal fails to accord with the NPPF 2019, Policy 7.16 of the London Plan 2016, Policy EM2 of the Local Plan Part 1 (2012), Saved policies OL1 and OL4 of the Local Plan Part 2 saved policies (2012) and emerging policy DMEI 4 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

2 NON2 Non Standard reason for refusal

The application provides insufficient information to demonstrate that occupants will not be placed at unacceptable risk of flooding and that the development will not put undue pressure on emergency services in the event of a flood. the submitted Flood Emergency Plan is not specific to the proposed use of the site and does not provide sufficient information. The proposals is therefore contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1-Strategic Policies (Nov 2012); Policy DMEI 9 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019); Policy 5.12 Flood Risk Management of the London Plan (March 2016) and National Planning Policy Framework (July 2018); and the, Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

3 NON2 Non Standard reason for refusal

The application has failed to submit a preliminary risk assessment to address the possible risk to controlled waters and has also failed to provide sufficient information on the proposed drainage scheme to determine risks to potable water supplies and this Nature Conservation Site. The proposals is therefore contrary to Policy EM6, EM7 and EM8 Flood Risk Management in Hillingdon Local Plan: Part 1-Strategic Policies (Nov 2012); Policy DMEI6, DMEI 9, DMEI 11 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019); Policy 5.12 Flood Risk Management of the London Plan (March 2016) and National Planning Policy Framework (July 2018); and the, Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

4 NON2 Non Standard reason for refusal

The application has provided insufficient information on the harm to residents and the impacts on the health and amenity of adjoining occupiers by reason of noise and disturbance, smell, dust and other pollutants, by virtue of the proposed campsite operations, vehicular movements and the Biomass Boiler. The proposal is thus contrary to Policy OE1 and OE3, AM2, AM7 and AM14 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and Policies DMEI 14, DMT1 and DMT2 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

5 NON2 Non Standard reason for refusal

It is considered that the Transport Statement provides insufficient evidence and data regarding both the existing and proposed use and therefore existing car parking and trip generation cannot be used to determine whether the proposals would have an negative

impact on local transportation and highway compared to the existing use. On this basis and taking account of the comments submitted by TfL the proposal is considered contrary to Hillingdon Local Plan: Part 2 -Saved UDP Polices AM2, AM7 and AM14 and Policies DMT1 and DMT2 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019) and policy 6.3 of the London Plan (2016).

6 NON2 Non Standard reason for refusal

The development by reason of camping clutter and inappropriate built form would fail to preserve or enhance the character, appearance and significance of the Springwell Lock and conservation area in accordance to the Planning (Listed Buildings and Conservation Areas) Act 1990. Taking into account paragraph 196 of the NPPF the harm to the conservation area would amount to less than substantial harm. However, the development fails to accord with the NPPF 2019, policies 7.4, 7.6 and 7.8 of the London Plan (2016), Policy BE1, HE1 of the Local Plan: Part One (November 2012) and Policy BE4 of the Local Plan: Part Two (November 2012) and policies DMHB1, DMHB4 and DMHB11 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

7 NON2 Non Standard reason for refusal

The submitted Arboricultural Impact Assessment fails to accord with British Standard 5837:2012 in so far as it is unclear about the trees to be removed. The survey plan is not to scale and does not appear to have been based on a topographic survey which casts doubt as to its accuracy when identifying root protection areas. No Arboricultural Impact Assessment plan has been submitted. The application is therefore likely to result in harm to additional trees which fails to accord with saved policy OL26, policy BE1 of the Local Plan Part 1 2012 and DMHB 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

8 NON2 Non Standard reason for refusal

Had the application been acceptable in other respects, a Travel Plan, mitigation for impacts on the Blue Ribbon Network, air quality, highways and ecology would have been required and secured by a section 106 legal agreement. There is currently insufficient information to assess the proposals impacts and given that a S106 agreement has not been completed this is contrary to Policy R17 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (2007), Policy 8.2 of the London Plan 2016 and the provisions of the London Borough of Hillingdon Planning Obligations SPD (2014).

3. CONSIDERATIONS

3.1 Site and Locality

The application site is broadly a triangular piece of land which is bound by the River Colne to the east and north and Springwell Lake to the west. The site is accessed via gates from Springwell Lane to the north. A hard surfaced track runs along the northern boundary and serves two existing detached chalet bungalows which are located close to the entrance gates. The track continues further to the west where it provides access to a yard area with one main central building which is single storey with some open storage and some additional small storage structures/sheds/containers around. The central building backs onto a landscaped (predominately grass) area which continues down to the banks of the river and forms an informal garden area to the residential houses.

There are at least two residential properties on the site. It should be noted that at least one of the residential units does not benefit from formal planning permission. Furthermore various uses on the site have been subject to enforcement action and was later subject to an Appeal (APP/R5510/C/17/3184266) which was quashed. The reasons set out by the Inspector related to the description set out on the enforcement notice rather than an assessment of the various uses on site. Therefore, the permitted uses on the site are to some degree unclear. However, the last permitted use was a garden centre.

The main non residential building is located in the western part of the site and appears to house a workshop, storage (both open and enclosed), a biomass boiler and car parking.

An application (ref. 24597/APP/2018/2452) for 'Installation of a biomass boiler and wood chip fuel store within an existing building' is currently at appeal and is awaiting a site visit by the Planning Inspectorate.

There are no listed buildings within the site or in the immediate area. However, this site lies within the Springwell Lock Conservation Area. The site also falls within the Green Belt and a Nature Conservation Site of Metropolitan or Borough Grade I Importance.

The nearest residential properties are located to the east on the other side of the River Colne and include The Lock Cottages, Ridge House and Willow Court. At the closest point, The Lock Cottages are located approx. 27m from the site.

In visual terms the site is currently reasonably prominent in the Green Belt from the lake to the west and views from that direction are the more open views. The eastern and northern sides of the site is generally screened by the river Colne and its surrounding vegetation.

3.2 Proposed Scheme

The proposed development would see the southern part of the existing central building demolished and the northern structure part replaced, part retained. The central building would measure approx. 5.3m in height and the roof would be pitched on all four sides with a crown flat roof element measuring approx. 120sqm. At the centre of the building is an open courtyard measuring approx. 12 sqm which would have glass walls and no roof. The plans submitted indicate that the building would be constructed or clad in timber. A small flue measuring approx. 25cm is shown on the elevations.

The proposed use of the central building is referred to a visitors centre on the proposed plans and would have an overall area of approx. 328sqm. Approx. 90sqm of this building would be used to house a biomass boiler. The remainder of the building would be used as a breakfast room, laundry room, toilets and as an office and storage rooms.

An application (ref. 24597/APP/2018/2452) for 'Installation of a biomass boiler and wood chip fuel store within an existing building' is currently at appeal and is currently awaiting a site visit by the Planning Inspectorate. Although the biomass boiler is shown on the proposed plans it has not been included in the proposed development description. Furthermore, no information relating to expected emissions has been provided (e.g. dispersal modelling of the emissions and/or pollution abatement technology).

Also proposed are seven detached 'glamping' pods which would be located separately along the western and southern boundary of the site. When the application was submitted these took the form of wooden structures but later the Applicant submitted images of a modern caravan type structure. Both options however, are considered of similar size and

proportions for the purpose of this assessment. No internal layouts have been provided for either option but from the images provided, it is unlikely that the pods could accommodate any toilet or shower facilities.

An oak gazebo viewing platform which would measure approx. 15m x 15m is also proposed on the western part of the site adjacent to the Lake.

A parking area providing 18 car parking spaces is proposed to the north of the site. A new access road within the site is proposed which would run broadly along the northern boundary, turn south along the western boundary and then accommodate a turning circle at the southern end of the site. It is assumed that this is provide vehicular access to the 'glamping' pods.

The proposed plans include soft landscaping around the northeastern and southeastern elevation of the visitors centre. This would run along the southern boundary of what could be considered the residential gardens. To the northeast of this, reed beds are proposed. It should be noted that a residential boundary has not been established for the two residential properties as they do not benefit from formal planning permission.

As stated above, the two existing residential units on the site do not benefit from formal planning permission and one is currently under consideration by the LPA and also the Planning Inspectorate (application ref. 24597/APP/2019/263). Although not included within the development description, both properties fall within the red line plan of this application.

The Applicant and Agent were invited to amend the development description or the red line plan to more accurately reflect what permission they were applying for but the Applicant declined. It is therefore unclear if the residential units and any other uses were intended to form part of the application.

For clarification purposes, this report is assessing all works indicated on the plans and the LPA therefore consider a more accurate description of development for this application to be:

"Retention of 2 x single family dwellinghouses and biomass boiler located to the north of the site, change of use of the southern part of the site to Use Class D2 for Glamping/Camping purposes, comprising the erection of Glamping Pods/Mobile Homes, a fixed construction visitor centre, Oak Gazebo viewing platform and the creation of a surface level car park in association with the proposed D2 use."

3.3 Relevant Planning History

24597/A/89/1968 Summerfield Springwell Lane Rickmansworth

Change of use of watercress beds to garden nursery and erection of associated shop and office building with parking for 28 vehicles ; erection of a 4 bedroom bungalow

Decision: 07-08-1990 Approved

24597/APP/2000/2079 Summerfield & Watercress Beds Springwell Lane Rickmansworth

RESIDENTIAL DEVELOPMENT COMPRISING TEN TWO-BEDROOM FLATS AND FIVE THREE-BEDROOM FLATS

Decision: 28-02-2001 Refused

24597/APP/2001/220 Summerfield & Watercress Beds Springwell Lane Rickmansworth
RESIDENTIAL DEVELOPMENT COMPRISING OF TWO DETACHED DWELLING HOUSES
WITH ATTACHED DOUBLE GARAGES

Decision: 02-12-2003 NFA

24597/APP/2006/1877 Summerfield & Watercress Beds Springwell Lane Rickmansworth
ERECTION OF A THREE-BEDROOM DETACHED DWELLINGHOUSE AND A SINGLE STORE
DETACHED BUILDING FOR USE AS AN OFFICE (CLASS B1).

Decision: 21-02-2008 Withdrawn

24597/APP/2006/1878 Summerfield & Watercress Beds Springwell Lane Rickmansworth
ERECTION OF A THREE-BEDROOM DETACHED DWELLINGHOUSE AND A SINGLE STORE
DETACHED BUILDING FOR USE AS AN OFFICE (CLASS B1)(DUPLICATE APPLICATION).

Decision: 21-02-2008 Withdrawn

24597/APP/2009/2187 Watercress Beds Springwell Lane Rickmansworth
Relocation and part change of use of previously approved nursery building for part use as Class
A3 Cafe with patio and seating area.

Decision: 07-09-2018 NFA

24597/APP/2013/3101 Summerfield Office Building Springwell Lane Rickmansworth
Change of use to residential (Prior Approval)

Decision: 05-12-2013 Refused

24597/APP/2017/109 Watercress Beds Springwell Lane Rickmansworth
Retention of a 3 Bedroom Chalet Style House as Residential Use from Ancillary Offices for a
Garden Centre.

Decision: 14-03-2017 Refused

24597/APP/2017/158 Blenheim Bedrooms Ltd, Watercress Beds Springwell Lane Harefield
Installation of a biomass boiler and a lean-to housing to existing workshop.

Decision: 03-07-2018 Withdrawn

24597/APP/2018/2452 Watercress Beds Springwell Lane Harefield

Installation of a biomass boiler and wood chip fuel store within an existing building

Decision:

24597/D/92/1550 Summerfield & Watercress Beds Springwell Lane Rickmansworth

Details of materials, surface water disposal and storage, land filling, access arrangements, landscaping and boundary fencing in compliance with conditions 2,3,4,6,8,9 and 10 of planning permission ref. 24597A/89/1968 dated 7.8.90; Change of use of watercress beds to garden nursery; erection of associated shop and office building; erection of a bungalow and ancillary parking

Decision: 12-05-1993 Approved

24597/E/99/1953 Summerfield & Watercress Beds Springwell Lane Rickmansworth

Change of use of the land from a mixed use for residential purposes and as a garden nursery to the storage of waste materials and graded infilling material (Appeal against Enforcement Notice Application for planning permission deemed to have been made pursuant to Section 174 of The Town and Country Planning Act 1990)

Decision: 19-04-2000 Refused **Appeal:** 19-04-2000 Dismissed

24597/PRC/2016/75 Watercress Beds Springwell Lane Rickmansworth

Change of use from garden centre to bed and breakfast and camping site

Decision: 12-10-2017 PRM

24597/PRE/2000/110 Summerfield & Watercress Beds Springwell Lane Rickmansworth
PRECORRES - ENQUIRY RE PROPOSED RESIDENTIAL DEVT

Decision:

24597/PRE/2003/52 Summerfield & Watercress Beds Springwell Lane Rickmansworth
PRE CORR: REDEVELOPMENT OF SITE

Decision: 26-02-2004 NFA

Comment on Relevant Planning History

Application ref. 24597/APP/2018/2452 for 'Installation of a biomass boiler and wood chip fuel store within an existing building' is currently being considered by the Planning Inspectorate.

As stated above, at least one of the existing residential units on the site do not benefit from formal planning permission and one is currently under consideration by the LPA and also the Planning Inspectorate (application ref. 24597/APP/2019/263). Although the residential properties fall within the red line plan of this application neither of them are included in the development description.

4. Planning Policies and Standards

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) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

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

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

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

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

Draft London Plan (Consolidated with Changes July 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. This Consolidated version remains under examination with a report by the appointed panel of Inspectors due in Autumn 2019.

The Council's general approach at this stage is to give limited weight to the draft London Plan as a material consideration when deciding planning applications given at this stage of preparation it remains subject to a large number of objections, and could still be subject to significant further change prior to publication.

Proposed Submission Local Plan Part 2 with Main Modifications (March 2019)

The Revised Proposed Submission Local Plan Part 2 (LPP2) documents (Development Management Policies, Site Allocations and Designations and Policies Map Atlas of Changes) were submitted to the Secretary of State for examination in May 2018.

The public examination hearing sessions took place over one week in August 2018. Following the public hearing sessions, the examining Inspector advised the Council in a Post Hearing Advice Note sent in November 2018 that he considers the LPP2 to be a plan that could be found sound subject to a number of main modifications.

The main modifications proposed by the Inspector were agreed by the Leader of the Council and the Cabinet Member for Planning, Transport and Recycling in March 2019 and were published for public consultation from 27 March to 8 May 2019.

Taking para 48 of the NPPF into account, the Council's general approach to the weight

which should be afforded to the draft LPP2 will be as follows:

The preparation of the LPP2 is now at a very advanced stage. The public hearing element of the examination process has been concluded and the examining Inspector has indicated that there are no fundamental issues with the LPP2 that would make it incapable of being found sound subject to the main modifications referred to above.

Those policies which are not subject to any proposed main modifications are considered to have had any objections resolved and can be afforded considerable weight. Policies that are subject to main modifications proposed by the Inspector will be given less than considerable weight. The weight to be attributed to those individual policies shall be considered on a case by case basis considering the particular main modification required by the Inspector and the material considerations of the particular planning application, which shall be reflected in the report, as required.

Finally, it is noted that the Inspector has indicated that subject to main modifications the LPP2 is fundamentally sound and therefore consistent with the relevant policies in the NPPF.

Notwithstanding the above, the starting point for determining planning applications remains the adopted policies in the Local Plan: Part 1 Strategic Policies and the Local Plan: Part 2 Saved UDP Policies 2012.

UDP / LDF Designation and London Plan

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

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM3 (2012) Blue Ribbon Network
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.HE1 (2012) Heritage
- PT1.T1 (2012) Accessible Local Destinations

Part 2 Policies:

- NPPF- 13 NPPF-13 2018 - Protecting Green Belt land
- NPPF- 14 NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
- NPPF- 12 NPPF-12 2018 - Achieving well-designed places
- NPPF- 15 NPPF-15 2018 - Conserving and enhancing the natural environment
- NPPF- 16 NPPF-16 2018 - Conserving & enhancing the historic environment
- NPPF- 4 NPPF-4 2018 - Decision-making
- NPPF- 9 NPPF-9 2018 - Promoting sustainable transport

AM14	New development and car parking standards.
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
BE1	Development within archaeological priority areas
BE20	Daylight and sunlight considerations.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
EC3	Potential effects of development on sites of nature conservation importance
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EM6	(2012) Flood Risk Management
LPP 5.12	(2016) Flood risk management
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 7.16	(2016) Green Belt
LPP 7.4	(2016) Local character
LPP 7.6	(2016) Architecture
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL4	Green Belt - replacement or extension of buildings
BE15	Alterations and extensions to existing buildings
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE4	New development within or on the fringes of conservation areas
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
EC2	Nature conservation considerations and ecological assessments
EC5	Retention of ecological features and creation of new habitats
LPP 5.13	(2016) Sustainable drainage
LPP 5.21	(2016) Contaminated land
LPP 6.13	(2016) Parking

LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.20	(2016) Geological Conservation
LPP 7.21	(2016) Trees and woodlands
LPP 7.24	(2016) Blue Ribbon Network
LPP 7.30	(2016) London's canals and other rivers and waterspaces
LPP 7.5	(2016) Public realm
LPP 7.8	(2016) Heritage assets and archaeology
OL13	Development associated with agricultural or forestry uses within or affecting conservation areas, archaeological priority areas etc.
OL2	Green Belt -landscaping improvements
OL5	Development proposals adjacent to the Green Belt
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
SPG-AQ	Air Quality Supplementary Planning Guidance, adopted May 2002

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **19th December 2018**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

A site notice was posted at the site and the proposed development was advertised in the local press. 35 neighbour notification letters were sent out to local residents. A petition signed by 36 people has also been received objecting to the proposal.

Objections were received by seven local residents and are summarised below:

- This will directly impact my view and enjoyment of my property and terrace overlooking this proposed camping site.
- This is wholly unsuitable and could create extra noise, traffic and pollution.
- Only one shower for all seven 'glamping' pods
- 'Unknown' sewerage disposal from the seven 'glamping' pods
- Biomass boiler, it's likely smoke emissions and the potential impact on Greenbelt and Conservation Area
- Credibility of the Transport Statement
- Overall negative impact on the local environment
- The site is already blighted by the unsightly structures on the site
- The open fires with flames rising above the buildings creates smoke billowing at all hours which has an effect on the air quality so that local residents can't even open their windows because of particles, smoke and smell

- Increase in noise and activity
- The other uses on the site would not be conducive to a campsite (e.g. the poor air quality created by the burning of open fires would have an impact on the users of the proposed camp site).
- Lack of sewage and rubbish/refuse strategy
- The local infrastructure network is not sustainable for anymore traffic as the 'Lane' is mostly single track.
- Danger due to the increased amount of young pedestrians which now use the lane since the opening of the new school close by
- Planning was originally granted for a garden centre, But over the past few years it has been used as commercial premises for everything from wagon park to camping site for American RV vehicles, to what is now a furniture making business.
- This area is already highly congested with traffic from the permanent moorings and trading estates within a small area
- We now live in constant fear of a major fire as the applicant has thousands of tons of wood stacked within 70 meters of nearby properties
- The area is an area of bird life protection and outstanding beauty.
- By encouraging a constant flow of campers into Springwell Lane we believe this will lead to increased noise and litter to an area which is fully overlooked by our property.
- Risk of constant flow of an additional 18 cars into Springwell Lane, which is a narrow lane and already experiences traffic issues with HGVs and vans using the Lane as a cut through, is also not practical.
- There has been problems with late night parties and noise from this property before and the idea of now turning it into a campsite will only further accentuate these problems.
- The words Camping Site covers a broad spectrum of uses, some of which would be undesirable. Once a camping site is established it could easily expand in numbers and types of camping (further glamping, tents and caravans) allowed on the site. Obviously sanitary conditions and the potential for an increase in fly tipping, which we are often aware of at present should be looked into by the Council. I would also assume that a depreciation in property prices would happen as well.

One petition signed by 36 residents objecting the proposed development has been received. The objections raised included:

Non compliance with the NPPF with particular regard to Greenbelt

Flood Risk, surface water run off and drainage

Disproportionate size of the visitors centre

Potential noise and light pollution

Impact on wildlife

Impact on and/or loss of trees

Negative impact on amenity of nearby residential properties, and particular concerns regarding late night activity and the potential for anti-social behaviour, lighting of fires and dogs

Increase in traffic on inadequate roads

Lack of information regarding occupancy levels

EXTERNAL CONSULTEE RESPONSES

NATS:

Raised no safeguarding objection to the proposal.

CANAL AND RIVERS TRUST:

No comment

TfL:

Whilst no specific standard is provided, it is considered that 18 car parking spaces for 7 'glamping' pods is excessive and is entirely unjustified. Furthermore, whilst it is noted that cycle parking will be

provided within each pod, the exact number of spaces has not been clarified and this should be confirmed. It is strongly recommended that the applicant explore options to increase active travel to the site, such as providing pool bikes, and a travel plan should be produced outlining measures and targets to achieve this aim. Furthermore, sufficient staff cycle parking should be provided, in order to promote active travel to the site by staff. Supporting end of journey facilities should also be provided. Given the scale and location of the proposed development, TfL considers the development will be completely car-based for both staff and visitors. As a result of this, the development is highly unsustainable.

The draft London Plan requires all development proposals to facilitate the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041, however it is unlikely that the development as it stands will contribute towards achieving this target. Although it is recognised this development will not impact on the strategic transport network, the applicant should address the above issues raised satisfactorily. As it stands, the development does not help to deliver the Mayor's strategic targets of 80% of all trips in London to be made by foot, by cycle or by public transport. Car parking should be reduced or fully justified and measures to increase active travel to the site should be explored.

HAREFIELD TENANTS AND RESIDENTS ASSOCIATION:

Thank you for notifying us about this Application for a Glamping Site on the former Watercress Beds in Springwell Lane Harefield. Having discussed this application with Committee members we are of the view that this proposal is more in keeping with the area and meets Green Belt rules better than the approved Garden Centre.

The Garden Centre is not currently operating at the site and there are numerous inappropriate activities taking place there which have enforcement notices in place.

MOD:

On reviewing the application plans, I can confirm that the MOD has no safeguarding objection to this proposal.

ENVIRONMENT AGENCY:

Thank you for consulting us on the above application. We object to the proposal as submitted as the application does not demonstrate the risks posed to controlled waters are acceptable, or can be appropriately managed.

Controlled waters are particularly sensitive in this location because the site is located:

within Source Protection Zone (SPZ) 1*
upon a Principal aquifer (with the secondary aquifer in hydraulic continuity with the Principal aquifer)

We recommend that planning permission should be refused in line with paragraph 170 of the National Planning Policy Framework (NPPF) and Policy DME1 11 of the new Hillingdon Local Plan part 2, for the following reasons:

1. No Preliminary Risk Assessment (PRA) has been submitted to address the possible risk to controlled waters
2. Insufficient information on the proposed drainage scheme has been submitted to determine risks to potable water supplies *SPZ 1 is used to identify the catchment areas of sources of potable water (that is, high quality water supplies usable for human consumption) and show where they may be at particular risk from polluting activities on or below the land surface.

Reason 1 - No Preliminary Risk Assessment has been submitted to address the possible risk to controlled waters.

The previous use of the development site as former garden centre and potential landfill presents a high risk of contamination that could be mobilised during construction to pollute controlled waters.

As the planning application is not supported by an appropriate risk assessment, it does not meet the requirements set out in paragraphs 170 and 178 of the NPPF.

The information submitted to date demonstrate the sites history as a garden centre but there's no history prior to this use, nor sufficient information to describe what activities were carried out on site during this time, such as but not limited to, the use of herbicides/molluscides, diesel for heating/generator and infilling/landraising. Records indicate that post use as watercress beds the site was infilled/raised, however there's no information considering this previous infilling within the documents submitted. Additionally information on the British Geological Survey borehole viewer indicates there to be several boreholes present on site, these will need to be investigated and decommissioned appropriately.

Reason 2 - Insufficient information on proposed drainage scheme to determine risks to potable water supplies.

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development can be satisfactorily managed. In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality because of the discharge of waste and wastewater (sewage) onto or into the ground.

In addition, the Colne River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. The proposal could cause deterioration of a quality element to a lower status class and/or prevent the recovery of a protected area because it could result in rising trends in chemicals within the waterbody.

Our approach to groundwater protection is set out in 'The Environment Agency's approach to groundwater protection'. In implementing the position statements within this guidance we will oppose development proposals that may pollute groundwater especially where the risks of pollution is high and the groundwater asset is of high value. In this case following position statements apply.

Groundwater Protection: Principles and Practice A5:

We expect developers and operators to provide adequate information to statutory bodies including ourselves when submitting their proposals, so that the potential impact on groundwater resources and quality can be adequately assessed. In particular, where new techniques, operations, products or substances are involved, developers or operators should be prepared to supply specific relevant data to allow the risk to groundwater to be assessed.

Groundwater Protection: Principles and Practice G10:

We will object to new developments that pose an unacceptable risk of pollution to groundwater from sewage effluent, trade effluent or contaminated surface water. This applies if the source of pollution is an individual discharge or the combined effects of several discharges, or where the discharge will cause pollution by mobilising contaminants already in the ground. In all cases we will object to any proposal to discharge untreated sewage** to groundwater and will use our notice powers to ensure treatment of any existing discharges.

**A sewage treatment system means a septic tank, infiltration system, drainage field and/or a package treatment plant or any other additional treatment in place. It does not include cesspools.

Groundwater Protection: Principles and Practice G13:

We support the use of sustainable drainage systems (SuDS) for new discharges. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater.

Where infiltration SuDS are proposed for anything other than clean roof drainage (see G12 - discharge of clean roof water to ground) in a SPZ1 we will require a risk assessment to demonstrate that pollution of groundwater would not occur. They will also require approval from the SuDS approval body (SAB), when these bodies have been established, to ensure they follow the criteria set out in the SuDS national standards (when published), including standards for water quality, design and maintenance.

For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit.

Overcoming our objections

The applicant should submit:

A preliminary risk assessment (PRA) which includes a desk study, conceptual model and initial risk assessment

appropriate plans for the management of sewage and drainage at the site This information must demonstrate that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. The submission of the above alone is not sufficient for us to remove our objection.

Advice to applicant

Any discharges to ground/surface water bodies are likely to require an Environmental Permit. The Environmental Permitting Regulations 2010 make it an offence to cause or knowingly permit a groundwater activity unless authorised by an Environmental Permit which we will issue. A groundwater / water discharge activity includes any discharge that will result in the input of pollutants to ground or surface water.

The car park associated with this development may require an Environmental Permit under the Environmental Permitting Regulations 2010, from the Environment Agency, unless an exemption applies.

The applicant is advised to contact the Environment Agency on 08708 506 506 for further advice and to discuss the issues likely to be raised. You should be aware that the permit may not be granted. Additional 'Environmental Permitting Guidance' can be accessed via our main website.

Final comments

Thank you again for consulting us. If you are minded to approve the application contrary to our objection, we request you re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objections detailed above be removed, it is likely we will recommend the imposition of conditions to be included on any subsequent approval.

Internal Consultees

Flood risk team:

The application should be refused as insufficient information has been provided to demonstrate that occupants will not be placed at unacceptable risk of flooding and that the development will not put

undue additional strain on emergency services in the event of a flood. The submitted Flood Emergency Plan is not specific to the proposed use of the site and does not provide sufficient information about the required actions in the event of a flood.

The Council needs to be assured that if they are placing new development in areas of flood risk, then there must be an appropriate reason. This development will introduce additional occupants into an area with an access route at high probability of flooding.

This puts additional residents at risk, as people returning to their homes may be inclined to navigate flood waters, or seek to retrieve flooded property (e.g. a vehicle) placing themselves at risk and putting added burden on emergency services.

REASON

The application should be refused as the applicant does not demonstrate that the site is safe and flood risk is suitably mitigated through the provision of an appropriate flood risk assessment as required by:

Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1-Strategic Policies (Nov 2012);
Policy DMEI 9 Management of Flood Risk in emerging Hillingdon Local Plan Part 2 - Development Management Policies;

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

National Planning Policy Framework (July 2018); and the,

Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

Blue Ribbon Network

With the proposed block plans showing some form of landscaping across the site which is not currently there and indicatively seems to be an enhancement, it would therefore be difficult to sustain a Blue Ribbon Network Objection, but should it be approved there would need to be a suitable condition for landscaping along with maintenance and management of this including the riparian buffer zone.

CONDITION: River Management Plan

A Riverside management and maintenance plan should be submitted and approved by the Local Planning Authority. This should include a detailed land ownership plans to show the extent of responsibility (not just land redline boundary on registry deeds) and how the corridor will be managed and enhanced as well as a plan for responding to any emergency blockages that may occur that could increase flood risk.

REASON:

To comply with London Borough of Hillingdon, Policy EM3 Blue Ribbon Network in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) to ensure the site makes a positive contribution to the Blue Ribbon and Strategic Waterway Network

Please note Informative Riparian Ownership and responsibility

If your deeds for your property show that you own up to the top of a river bank you may well be the riparian owner of half of the river and be responsible for its maintenance.

Owning a Watercourse provides further guidance about these rights and responsibilities and the Land Registry website also provides clarification on this in Section 11.3 <https://www.gov.uk/government/publications/land-registry-plans-boundaries/land-registry-plans-boundaries-practice-guide-40-supplement-3#boundary-agreements-and-determined-boundaries>
Highways team:

No objection

Conservation and Design:

Summary of comments: Objections.

The development would fail to preserve or enhance the conservation area in accordance to the Planning (Listed Buildings and Conservation Areas) Act 1990. Taking into account paragraph 196 of the NPPF the harm to the conservation area would amount to less than substantial harm.

2 Historic Environment Designation (s)

a-Springwell Lock Conservation Area (Designated heritage asset)

b- Colne Valley Archaeological Priority Zone (APZ)

3 Assessment - background/significance

The site is located within the northern extremity of the borough, near to the border with Hertfordshire. Its location at the edge of London defines it with a unique character. It forms part of the Springwell Lock Conservation Area which is also designated as greenbelt. The surrounding area is rural in character and sprawls out onto open countryside towards Hertfordshire and Buckinghamshire.

The site itself is surrounded by the River Colne, Grand Union Canal and Springwell lake (a former gravel pit). Historically the existing site had been used as watercress beds, which was not uncommon within the area. The lake, river and canal set within the open, verdant environment are positive contributors to the character and appearance of the conservation area and contribute to its special interest. Unfortunately overtime the appearance of the site has suffered from some development which has not all benefited from permission. The establishment of these structures and the area of hardstanding are detracting elements within the conservation area, harming its open verdant character.

4 Assessment - impact

The proposed change of use would establish a permanent group of buildings on the site. The proposed seven pods, viewing platform and visitor centre would result in a clutter built forms sprawled across the site. The proposed pods would be located along the periphery of the site. The submitted drawings suggest permanent cabin-like structures with kitchen and dining areas, a shower room and a decked area. However taking into account they are proposed as camping structures they appear to lack a definable sleeping area. Additionally the need to run services to each pod would result in further alterations to the site. The proposed timber clad exterior with glazed windows and door openings would result in a solid, boxy structure which would fail to sit quietly within the surrounding environment. They would essentially appear as summerhouses, usually found within the rear gardens of suburban residential dwellings. The pods would be considered incongruous, odd additions within the conservation area and would be visible via pocket views along Springwell Lane.

The existing structure on the site is a crude, piecemeal built form. The repurposing of such a building would be considered inappropriate. The proposed visitor centre building would establish a large dominant built form within the centre of the site. It would be stark addition which would fail to enhance the surrounding environment. The crown roof form and plain appearance of the building would fail to enhance the appearance of the site. The double height glazed entrance would be considered a disproportionate feature which contributes little to the proposed boxform. Furthermore the proposed open courtyard within the centre of the building would be a rather useless space contributing nothing to the building. The large breakfast area within the building is a little confusing as it is unclear who would need to use such space when the pods are proposed as self-contained units. The information provided is not very clear or consistent.

The formal landscaping of the site and provision of a permanent car park would not be considered wholly appropriate. There would also be concerns regarding the change of use in terms of the

potential for other camping related clutter from an unrestricted camping site use. A clutter of tents, camper vans and cars alongside the proposed structures would result in significant harm to the character and appearance of the conservation area.

No information has been provided in relation to the design of the oak gazebo viewing platform and two bridges along the northern boundary of the site. All three structures are likely to have an impact on the character and appearance of the conservation area and without detailed drawings it would be difficult to define the extent of harm caused. Furthermore it is inevitable lighting would be required across the site resulting in a more visible site particularly at night.

The submitted information fails to meet the requirements of paragraph 193 of the NPPF (2019). Due to the lack of a heritage statement there are concerns that there is little understanding of the significance of the site and how their proposals will impact the heritage assets.

5 Conclusion: Objection.

As proposed the application is lacking a significant amount of information and based on the submitted information there are concerns that the proposal will fail to adequately preserve the character, appearance and significance of the conservation area in accordance to the Planning (Listed Buildings and Conservation Areas) Act 1990.

Whilst the nature of the proposal on this site alone may result in less than substantial harm to the conservation area the incremental harm of other green belt sites being used in a similar manner would result in substantial harm to the heritage asset. It is recognised that site would benefit from some form of enhancement however paragraph 191 of the NPPF (2019) would need to be noted. Any consideration given toward the enhancement of the site would need to be of an exceptional quality which positively contributes to the historic and natural environment. A significant balance would need to be considered taking into account paragraph 193 and 196 of the NPPF (2019)

Waste Team:

The proposed plans should detail how waste and recycling produced on site will be separated and stored securely. The proposed plan should also show that a refuse collection vehicle can enter and exit the site in a forwards motion. This may require a turning head if there is not a turning circle large enough to accommodate the vehicle. The vehicle should not have to reverse further than 12 metres and the collection crew should not have to cart any bins with four wheels further than 10 metres. The surface over which the bins are pulled should be a minimum of 2 metres wide, smooth and free from steps or kerbs. The roadway should be suitable to withstand the load of a 26 tonne vehicle.

ARBORICULTURAL OFFICER

This site is occupied by an area of land to the south of Springwell Lane which is surrounded by the River Colne to the east and Springwell Lake to the south and west.

Situated within the countryside, the land was originally associated with watercress beds. Since 1990 the site has seen changes of use, including the establishment of a garden centre.

Currently the site presents itself as out of character with its countryside setting, with a formal wall and steel gates at the entrance.

Within the site there are a number of buildings including a two-storey dwelling, single-storey bungalow /office and garden centre.

Much of the land is currently unmanaged.

The site lies within the Green Belt and is a SINC. It is also within the Springwell Lock Conservation Area.

COMMENT

The site has a history of planning applications, several of which have been refused or NFA'd. These comments are based on previous site visits with no recent access gained onto the land.

The proposal is to develop the site for 'glamping' with seven camping pods.

The existing garden centre building will be retained and its use converted.

At 4.5 the D&AS notes that the site will be landscaped and this is supported by a general sketch proposal on the proposed block plan.

The sketchy plan indicates the introduction of hedges, trees and reed beds, all of which have the potential to enhance the site and provide an attractive and discrete setting for the glamping pods - subject to detail.

Further landscape enhancement will be required around the car park and entrance off Springwell Lane.

An ecological report by Lizard makes a number of recommendations for ecological enhancement in section 8.0

Given the history of the site and its current character and appearance, a more detailed landscape masterplan is required to provide the necessary level of assurance that the landscape objectives will provide suitable screening and mitigation for the proposed development.

RECOMMENDATION

It is not known whether this development in the Green Belt provides the very special circumstances required by policy DMEI:4?

The application fails to satisfy policy DMHB14: Trees and landscaping and is unacceptable.

Further comments received:

Arboricultural Assessment and Tree Protection Scheme has been submitted by South Oaks Arboricultural Consultancy.

COMMENT

The report has identified and assessed the condition and value of 23 trees.

There are no 'A' grade trees.

21 trees are graded B1 or B2 and should be retained if possible. Two trees are 'C' grade trees whose condition and value would not normally be seen as a constraint on development.

Clause 1.4 refers to the possible felling of trees with a diameter below 150mm. According to the British Standard all trees with a stem diameter of 75mm or more should be plotted unless they are woodland trees / trees in substantial groups.

With regard to the tree protection offered by virtue of being within the Conservation Area, the 75mm rule prevails. The statement in clause 6.2.1 is confusing.

In 6.3.1 the report comments that two cabins and the gazebo conflict with the RPA of trees T963, T964 and T967 and should be re-sited. There is no evidence that the re-siting has taken place?

RECOMMENDATION

The tree survey should be based on a measured topographic survey. A Tree Constraints Plan is required to inform the site layout - avoiding any incursion into the RPA's of the trees.

A schedule of trees to be retained / removed should be clear and not qualified by removed 'if necessary'.

Refusal Reason:

The submitted Arboricultural Impact Assessment fails to accord with British Standard 5837:2012 in so far as it is unclear about the trees to be removed. The survey plan is not to scale and does not appear to have been based on a topographic survey which casts doubt as to its accuracy when identifying root protection areas. No Arboricultural Impact Assessment plan has been submitted. The application is therefore likely to result in harm to additional trees which fails to accord with saved policy OL26, policy BE1 of the Local Plan Part 1 2012 and DMHB 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

SUSTAINABILITY

I object to the proposed development as there is insufficient information regarding foul drainage.

Reason for Refusal - Insufficient information has been provided to demonstrate that the development would not have an unacceptable risk from wastewater discharges on the natural environment, including a site of importance for nature conservation and a source protection zone for a drinking water supply.

The proposed cabins are likely to be isolated from a mains supply on site (ir present) requiring significant utility works to connect them. The application form includes questions on foul drainage with several options available; unfortunately the form in this instance states that the means of foul drainage is 'unknown'.

This is unacceptable given each cabin includes a toilet. The standard advice from the Environment Agency states:

When drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). This will need to be done in consultation with the sewerage company of the area.

It is unlikely that a mains connection will be available therefore it is essential that the type of wastewater discharge is properly considered at determination stage as the only alternative non mains drainage requires discharge to the ground noting that Cesspits are not at all appropriate. This is particularly important for this development as [1] the site is within a very sensitive groundwater zone (source protection zone 1) meaning there is a clear connection between groundwater and drinking water and [2] non-mains drainage arrangement require space to be allocated within the development to be appropriate and effective. The advice from the Agency states:

Where a connection to a public sewage treatment plant is not feasible (in terms of cost and/or practicality) a package sewage treatment plant can be considered. This could either be adopted in due course by the sewerage company or owned and operated by a sewerage undertaker appointed under a new appointment or variation. The package sewage treatment plant must comply with the general binding rules, or a permit will be required. A package sewage treatment plant must be used if the treated effluent is being discharged to surface water.

The applicant must be able to demonstrate that the wastewater discharge can be safely managed with negligible risk to either ground or surface water and not to give rise to human health problems.

GENERAL ECOLOGY

I have no objections to the proposed development on ecology grounds. Although the site lies within the Springwell and Stocker's Lake Metropolitan Site of IMportance for Nature Conservation, the impacts are considered to be of a low scale. This is largely as a consequence of a poor quality of existing habitat on site combined with the existing conflicting use.

Nonetheless, the following condition is necessary (should the above objection be overcome):

Condition

Prior to commencement of development a detailed ecological enhancement plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include full details of the measures to be incorporated into the development to improve opportunities for flora and fauna and

result in a net ecological gain. The plan shall be accompanied by a commentary explaining the measures selected and how they will enhance ecological value as well as be maintained thereafter. The development must proceed in accordance with the approved plan.

Reason

To ensure the development contributes to the enhancement of ecology in accordance with the NPPF and Policy EM7 of the Local Plan Part 1.

CONTAMINATION

Based on a search of available information within historic mapping and other records, there is evidence of nearby historic chalk workings with subsequent infilling of the voids being likely.

There is also evidence of other possible infilling works having been conducted at the location of the former watercress beds.

The site is also highly sensitive as it overlies a Principal Aquifer, with other controlled waters located nearby.

Therefore I recommend the following condition be applied:

Proposed conditions for land affected by contamination.

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

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

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

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works 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 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The established and permitted use of the site is not clear but at Para. 4 of Appeal Decision ref. APP/R5510/C/17/3184266 the Inspector stated that 'In terms of the history of the site, a planning application was submitted in 1968 for the change of use of the land to a garden nursery and for the erection of an associated shop and office building, a parking area and a 4 bedroom bungalow. A significant period of time elapsed before the application was approved in 1990 and work on the scheme commenced in 1993. There is no dispute that the permission was lawfully implemented. The buildings referred to as A, B, C and D on the enforcement notice were all constructed as part of that consent for various purposes associated with the permitted use'.

At para. 8 and 12 the Inspector went on to say that 'There is no dispute that some of the alleged components of the breach have occurred. Building B is a photography studio that is used for business purposes by the appellant's son in law who has a photography business..... The hard-surfaced area hatched in blue on the plan attached to the notice was used for commercial vehicle parking and general commercial storage by a local building company. The use took place on a specific area of land to the west of the site and was unconnected with any other activity that was taking place..... The appellant accepts that he has used part of the building for the assembly of flat-pack furniture in connection with his business of installing pre-manufactured bedroom furniture. Thus, he argues that furniture is assembled rather than manufactured.... I should also stress that, at the time of my visit, part of the building had been let to a local building/ joinery firm for the storage of materials and equipment.

Although the appeal was quashed, the reasons given by the Inspector did not relate to an assessment of the planning merits, rather inaccuracies in the description set out in the enforcement notice.

Despite the information set above, the application documentation refers to the existing use as a garden centre.

Given the above, when read in conjunction with the application documentation and observations made during a site visit it is difficult to state for certain what the existing uses on the site are. There are, or have been a number of different uses and business operating on the site historically. However, none of the existing uses are referred to in this current application.

DEVELOPMENT WITHIN THE GREEN BELT

The principle of change of use to campsite including visitors centre and seven 'glamping' pods:

The application site is within the Green Belt and proposes a permanent change of use of the land to a camping site (Use Class D2). Although not featured within the planning application documentation or development description, the proposed plans also include two residential properties and a large portion of the central building for use as a biomass boiler plant room. Also included in the proposed plans is an open car parking area for 18 cars and a new internal access road.

Paragraph 133 of the NPPF says that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.

London Plan Policy 7.16 seeks to protect London's Green Belt and says that inappropriate development should be refused, except in very special circumstances. Local Plan (Part 1) Policy EM2 says that proposals for development within the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test. This is reiterated in Draft Local Plan (Part 2) Policy DME1 4.

Saved UDP Policy OL1 says that acceptable uses within the greenbelt include agriculture, horticulture, forestry and nature conservation; open air recreational facilities; and cemeteries.

Paragraph 145 of the NPPF says that 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.....

Paragraph 146 of the NPPF also states that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include 'material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)'.

Local plan policies OL1 and OL4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging policy DME1 4 of the draft Local Plan Part 2 echo this national policy objective.

The change of use of the land to provide a glamping site proposes, as part of the current application, the erection 7 glamping 'pods' (non-fixed structures of a similar form to a caravan for clarification), a fixed and permanent building containing a visitors centre, an oak gazebo viewing platform, a car park to accommodate 18 vehicles and a vehicular access road into the site. In addition to this, the application seeks unrestricted use of the whole/remaining site for the facilitation of other vehicles including camper vans and other

mobile homes to camp/reside at the site for camping purposes, including tents.

Based on the planning policy context set out above, the first issue to consider is whether a campsite with glamping pods falls under the definition of outdoor recreation. There is no prescribed definition of outdoor recreation and it is not certain that a campsite would fall into this category. It is likely that the glamping pods will operate more as leisure-based holiday lets given their permanence and it is currently unclear if other tents and camping vehicles would be of a more permanent or temporary nature. The addition of the proposed visitor centre would further to the built form on the site. Given that both paragraphs 145 and 146 of the NPPF require that for any of the identified exceptions to be appropriate, they must also preserve the openness of the Green Belt and not conflict with purposes of including land within it. It is considered that in this instance, the proposed scale of the permanent built form and temporary structures would make it by definition inappropriate development. Very special circumstances must therefore be demonstrated to outweigh the identified harm to the Green Belt.

The applicants have failed to demonstrate any very special circumstances exist as part of this application. Consequently the subsequent assessment focuses on the extent to which the proposed development would conflict with the preservation of openness and the purposes of including land in the Green Belt and whether this would outweigh any potential harm.

The proposed visitors centre is considered to be excessive in footprint, height, bulk and massing. The size of the building, measuring approx. 328sqm in footprint and approx. 5.3m in height with a crown flat roof element measuring approx. 120sqm is not justified by the proposed use which is to provide a breakfast room, toilets and an office facility in connection with the provision of seven 'glamping pods'. No upper floor is proposed within the building and so the large crown flat roof element is considered unnecessarily large. Overall the development would result in an increase of built footprint of approx. 127sqm.

The proposed oak gazebo viewing platform would measure approx. 15m x 15m. The seven 'glamping' pods would be located along the western and southern boundary. Whilst the glamping pods are movable structures, their primary aim is to provide semi-permanent residency on the site and whilst a comparable tent on a camping site would be much smaller in size and demounted and removed from the site as visitors came to the site, this is not the case for the proposed Pods. The proposed pods would remain in situ for all year round, even when not occupied/let. The size of each pod and its semi permanent nature exacerbates the detrimental impact upon the openness of the Green Belt.

The western side of the site is considered to be the more open view and increasing development along here is considered to have a detrimental impact on the openness of the Green Belt.

In addition to the size of the visitors centre, the planning application seeks change of use of the whole site to D2 campsite and so the unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents could result in excessive visual clutter to the detriment of the overall appearance of the site. The proposal is considered to have an unacceptable impact on the openness of the Green Belt by virtue of its use and associated structures required to facilitate the camping/glamping offer.

Whilst the Council acknowledge that the existing site is in a poor state, this has primarily

resulted from the unauthorised use of the site for purposes which have been the subject of enforcement investigations. This fact alone does not constitute very special circumstances to warrant the granting of planning permission.

Residential use on the site

As stated above, there are two residential properties on the site, at least one of which does not currently benefit from planning permission but which are included within the red line. Although these properties fall within the red line plan, no reference to these properties has been made within the current application. On the assumption that these two properties are on the proposed plans, it is deemed that their retention in their current form is also sought as part of this wider application, there is no indication on the submitted plans or documents that these buildings would be removed to facilitate the wider proposed use of the site for a Camping site.

Because no information has been submitted a full assessment is not possible. However, it is considered that the retention of these properties (including the building which is deemed to be unauthorised) properties would contribute cumulatively to encroachment into the Green Belt and impact negatively on the openness of the Green Belt when assessed alongside the proposed visitors centre and 'glamping pods'.

As stated above there are also concerns relating to the potential unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents which could result in excessive visual clutter to the detriment of the Greenbelt and overall appearance of the site if change of use of the whole site to D2 use were to be permitted.

Summary

The proposal for the change of use of this site with associated fixed and movable structures, car parking ancillary camping and retention of unauthorised residential properties, provision of a biomass boiler and any open storage that falls within the red line (but does not feature within the applicants description of development) would cumulatively constitute inappropriate development in the Green Belt which would be detrimental to its character and openness whilst conflicting with the purposes of including land within it. The proposal fails to accord with the NPPF 2019, Policy 7.16 of the London Plan 2016, Policy EM2 of the Local Plan Part 1 (2012), Saved policies OL1 and OL4 of the Local Plan Part 2 saved policies (2012) and emerging policy DME1 4 of the Draft Local Plan Part 2 Development Management Policies (with Modifications' March 2019).

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

The site falls within Springwell Lock Conservation Area. There are no listed buildings within or close to the site. The site also falls within a Nature Conservation Site of Metropolitan or Borough Grade I Importance.

In considering development affecting a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that local authorities shall pay special attention to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area. The duties imposed by section 72 of the Act are in addition to the duty imposed by section 3(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.

In this case, the primary issue relates to preserving or enhancing the character and appearance of the Springwell Lock Conservation Area. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the harm caused.

The NPPF 2019 requires its own exercise to be undertaken as set out in its chapter 16. Conserving and enhancing the historic environment. Paragraphs 184-202 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 196 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy 7.8 of the London Plan (2016) requires new developments to identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. It notes, development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy HE1 of the Local Plan: Part One (November 2012) seeks to conserve and enhance the distinct and varied environment of the Springwell Lock Conservation Area.

Policy BE4 of the Local Plan: Part Two (November 2012) notes new development within or on the fringes of Conservation Areas will be expected to preserve and enhance those features which contribute to their architectural and visual qualities.

Paragraph 192 of the NPPF says that in determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Also of great importance in the consideration of the current proposals is para 191 of the NPPF which states:

"Where there is evidence of deliberate neglect of or damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision."

This site lies within the Springwell Lock Conservation Area, the Green Belt and within a Nature Conservation Site of Metropolitan or Borough Grade I Importance. The site is attractively located adjacent to Springwell Lake and is currently occupied by a number of ad hoc buildings and hard standing. Whilst this site is in a poor state, it deserves a high standard of application. There is a significant planning history on this site, including infringements which have no bearing on the conservation comments, in accordance with para 191 of the NPPF 2019.

As it currently stands this application has a greater net negative impact than would be desired or is deemed necessary. The proposal introduces overly large pod structures to areas of the site that are currently in their natural state, along with a service road to them and a 'viewing structure'. This introduces a level of harm, which the proposal means to, but

fails to, mitigate with improvements to the core of the site where development has previously taken place. The size of hub building required is also questioned, as the pods are essentially self contained.

The applicant needs to demonstrate a greater understanding of the significance of the site and how their proposals will impact, sustain or enhance the site, in a way that is consistent with its conservation and its social, economic and environmental sustainability.

As NPPF paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, such as a Conservation Area, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.

In this respect, the harm identified above would be less than substantial and it is necessary in line with NPPF (2019) paragraph 196 that the identified harm is weighed against the public benefits of the proposal including where appropriate, securing its optimum viable use. Allowing the proposed scheme would compromise and harm the character and appearance of the Conservation Area due to extent of the fixed and movable structures and the potential for additional visual clutter in the form of camper vans and tents by virtue of an unrestricted camp site use.

The character and appearance of the Conservation Area would be harmed by the proposed development in its entirety. The harm would be permanent and long-standing adversely affecting the way that the significance of the heritage asset would be appreciated. The granting of this application would be inconsistent with the principle of preserving and enhancing the character and appearance of the Conservation Area. Given this, clear and convincing justification for the harm that would be caused to the Conservation Area, has not been provided. Applying the test of balance in paragraph 196 of the NPPF, it is considered that the heritage harm would be of a scale that would outweigh the scheme's benefits.

The Government's Planning Practice Guidance (PPG) states that public benefits can be anything that arises from a development that delivers economic, social or environmental progress. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. The public benefit gained from this proposal is the provision of a camp site which is stated to be an economic benefit by the applicant in their supporting documentation. Notwithstanding the environmental concerns arising from this development proposals, the cited economic benefits of the scheme are not considered to outweigh the less than substantial harm caused.

7.05 Impact on the green belt

Impact on the Green Belt has been addressed in section 7.01 above.

7.06 Environmental Impact

The site falls within a Nature Conservation Site of Metropolitan or Borough Grade I Importance. Hillingdon Local Plan: Part 2 - Saved UDP Policy EC3 says that the local planning authority will require proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites of changes in the water table and of air, water, soil and other effects which may arise from the development.

Biodiversity/Ecology

Draft policy DMEI 7 (Biodiversity Protection and Enhancement) of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019) seeks to retain and enhance features of biodiversity value. It says that where development is proposed on or near the vicinity of a site considered to have features of ecological value, applicants must submit an appropriate surveys and assessments independent habitat assessment to demonstrate that the proposed development will not have unacceptable ecological effects and that the development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value. Furthermore, all development alongside a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.

Although the site lies within the Springwell and Stocker's Lake Metropolitan Site of Importance for Nature Conservation, the impacts are considered to be of a low scale. This is largely as a consequence of a poor quality of existing habitat on site combined with the existing conflicting use.

In this regard no biodiversity benefits have been incorporated into the proposed development. However, some potential enhancements were identified in the Preliminary Ecological Appraisal Report and it is considered that details of these and further ecological enhancements could have been secured by way of condition, therefore refusal on these grounds is not recommended.

Blue Ribbon Network

The Blue Ribbon Network runs along the whole of this application site boundary. The River Colne which surrounds the site is noted within the explanatory text to Local Plan Part 1 Policy EM3 as being of sub-regional Importance. As such, any further development on the application site would be required to make a positive contribution to the Blue Ribbon Network.

The London Plan emphasises the importance of the Blue Ribbon Network (London Plan 2016 Policies 7.24, 7.27, 7.28 and 7.30). Policy DMEI 6 seeks to secure extensive peripheral landscaping to site boundaries where new development is proposed adjacent to the Blue Ribbon Network and Green Belt site. Policy DMEI 8 Waterside Development in the emerging Hillingdon Local Plan Part 2 - Development Management Policies - must also be given some weight in any decision on this application as it seeks to resist development proposals that would adversely affect the infrastructure of main rivers and watercourses.

With the proposed block plans showing some form of landscaping across the site which is not currently there and indicatively seems to be an enhancement, it would therefore be difficult to sustain a Blue Ribbon Network Objection, but should it be approved there would need to be a suitable condition for landscaping along with maintenance and management of this including the riparian buffer zone.

Archaeology

Whilst the site is located within an APZ, the proposed works, as submitted, propose movable structures being stationed above ground, with only the visitor centre block being a permanent structure and the surface level car parking being laid. Given the limited extent of works, whilst it would have been preferable for a desk top assessment to have been undertaken to establish the level of harm within this designated APZ, a grampian condition could be imposed to secure such surveys and works are undertaken prior to

commencement of the works proposed. A reason for refusal is not therefore proposed in relation to this matter.

Contaminated Land

Should planning permission have been granted, a condition would have been imposed seeking work be undertaken to establish if remediation work is required as the site.

7.07 Impact on the character & appearance of the area

Impact on the character and appearance of the area has been addressed in section 7.11 below.

7.08 Impact on neighbours

Privacy, overlooking and sunlight/daylight

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 BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the design of new buildings should protect the privacy of occupiers and their neighbours.

The proposal complies with guidance relevant to loss of privacy and overlooking to nearby residents. The development is therefore in accordance with Policy BE24 of the Local Plan Part 2. Similarly, is not considered that there would be a material loss of daylight or sunlight to any neighbouring residential property, in accordance with Policy BE20 of the Local Plan Part 2 and relevant design guidance.

7.10 Traffic impact, car/cycle parking, pedestrian safety

Section 9 (Promoting sustainable transport) of the 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 if there would be an unacceptable impact on highways safety or where the residual cumulative impacts of development are severe.

Local requirements in relation to impacts on traffic demand, safety and congestion are set out in Local Plan Part 2 policies AM2, AM7 and AM14 which states that permission will not be granted 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.

This is reiterated by Draft Local Plan (Part 2) Policies DMT1 and DMT2.

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

The site is accessed via Springwell lane which is a single track road which widens in places to allow for vehicles to pass.

TfL were consulted on the proposals and their full comments can be found above in the relevant section. TfL stated that "Whilst no specific standard is provided, it is considered that 18 car parking spaces for 7 'glamping' pods is excessive and is entirely unjustified'.

'Furthermore, whilst it is noted that cycle parking will be provided within each pod, the exact number of spaces has not been clarified and this should be confirmed. It is strongly

recommended that the applicant explore options to increase active travel to the site, such as providing pool bikes, and a travel plan should be produced outlining measures and targets to achieve this aim. Furthermore, sufficient staff cycle parking should be provided, in order to promote active travel to the site by staff. Supporting end of journey facilities should also be provided. Given the scale and location of the proposed development, TfL considers the development will be completely car-based for both staff and visitors. As a result of this, the development is highly unsustainable'.

As stated previously, the existing use is not clear. The most recent permission was for use as a garden centre which included on-site parking for 28 cars. However, it is clear that the garden centre has not been operational for some time and despite enforcement action and Appeals, the permitted use is still unclear. The Councils highways team have raised no objection to the scheme. However, as the planning application seeks change of use of the whole site to D2 campsite concerns have been raised by local residents regarding the unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents which could result in more vehicular activity than expected.

Section 7.18 of this report sets out details of the existing unauthorised Biomass Boiler on the site. This development is the subject of a current appeal, but as the structure which houses the Biomass Boiler is shown on the submitted plans for this application, it is also considered under this application. The deliveries and vehicular movements associated with the Biomass Boiler are also not detailed in the submitted Transport information therefore the statement fails to take the cumulative impact of all existing and proposed works (authorised and unauthorised) into account.

On balance it is considered that the application provides insufficient evidence and data regarding both the existing and proposed use and therefore existing car parking and trip generation cannot be used to determine whether the proposals would have a negative impact on local transportation and highway compared to the existing use. On this basis and taking account of the comments submitted by TfL the proposal is considered contrary to Hillingdon Local Plan: Part 2 - Saved UDP Policies AM2, AM7 and AM14 and Draft Local Plan (Part 2) Policies DMT1 and DMT2, policy 6.3 of the London Plan (2016).

Car parking and Layout

As stated above the level of car parking has generated an objection from TfL. However, given the size of the site the Layout is considered acceptable, when looking solely at the proposal for an 18 space surface level car park to serve the glamping pods. When looking at the wider proposals for unrestricted access and use of the site for camping (tents and camper vans), insufficient information has been provided to assess whether the level of parking provision proposed is acceptable for all existing and proposed uses on this site.

7.11 Urban design, access and security

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.

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.

Draft Development Management Policy DMHB 11 seeks high quality design in all developments and aims to incorporate principles of good design including (but not limited to) the provision of landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

The proposed visitors centre is considered to be excessive in footprint, height, bulk and massing. The size of the building, measuring approx. 328sqm in footprint and approx. 5.3m in height with a crown flat roof element measuring approx. 120sqm is not justified by the proposed use which is to provide a breakfast room, toilets and an office facility in connection with the provision of seven 'glamping pods'. No upper floor is proposed within the building and so the large crown flat roof element is considered unnecessarily large.

In terms of design, it is considered that the overall appearance of the building and the wider site could be improved if the development were built out in accordance with the approved plans and the use of wood to either construct or clad the building would be acceptable. However, the planning application seeks change of use of the whole site to D2 campsite and so the unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents could blight the overall appearance of the site if permitted.

Overall the development would result in an increase of built footprint of approx. 127sqm. The proposed oak gazebo viewing platform would measure approx. 15m x15m. The seven 'glamping' pods would be located along the western and southern boundary. The western side of the site is considered to be the more open view and increasing development along here is considered to have a detrimental impact on the openness of the Green Belt.

Also within the red line are the residential properties which have not been included in the development description. It should be noted that the Applicant and Agent were invited to amend the development description and/or the red line plan but the Applicant declined.

For the reasons set out above, the development would result in an excessively large building which would result in over development of the site. It is also considered that the proposed use would result in a significant increase in the built up appearance of the site resulting in a reduction in the openness of the Green Belt and the proposals are not considered acceptable on this basis.

The proposed development is therefore contrary to Policies 7.4 and 7.6 of the London Plan (2016), Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) and Draft Policy DMHB 11 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7.14 Trees, Landscaping and Ecology

Draft policy Policy DMHB 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with modifications (March 2019) says that all developments should retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

This site is occupied by an area of land to the south of Springwell Lane which is surrounded by the River Colne to the east and Springwell Lake to the south and west. The site lies within the Green Belt and is a SINC. It is also within the Springwell Lock Conservation Area.

The submitted arboricultural report has identified and assessed the condition and value of 23 trees. There are no 'A' grade trees. 21 trees are graded B1 or B2 and should be retained if possible. Two trees are 'C' grade trees whose condition and value would not normally be

seen as a constraint on development.

Clause 1.4 of the submitted arboricultural report refers to the possible felling of trees with a diameter below 150mm. According to the British Standard all trees with a stem diameter of 75mm or more should be plotted unless they are woodland trees / trees in substantial groups. With regard to the tree protection offered by virtue of being within the Conservation Area, the 75mm rule prevails. The statement in clause 6.2.1 is confusing and raises queries as to the accuracy of the report lodged, in so far as establishing if the report has discounted or not identified trees on the suite of less than 150mm diameter.

In 6.3.1 the arboricultural report , the conclusions state that two cabins and the gazebo conflict with the Root Protection Areas of trees T963, T964 and T967 and should be re-sited. There is no evidence that the structures have been re-sited based on the plans lodged and recommendations made. Therefore it is concluded that the proposals would have a detrimental impact on the root protection areas of 3 trees surveyed on the site.

The submitted Arboricultural Impact Assessment fails to accord with British Standard 5837:2012 in so far as it is unclear about the trees to be removed. The survey plan is not to scale and does not appear to have been based on a topographic survey which casts doubt as to its accuracy when identifying root protection areas. No Arboricultural Impact Assessment plan has been submitted. The application is therefore likely to result in harm to additional trees which fails to accord with saved policy OL26, policy BE1 of the Local Plan Part 1 2012 and DMHB 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7.16 Renewable energy / Sustainability

Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development. The planning application was accompanied by a Sustainability Statement which states 'the purpose of this Sustainability Statement is to demonstrate that the proposed project is considering adopting and incorporating suitable sustainability measure to enhance the overall sustainable qualities across the site wherever possible'. The report then sets out a number of aspirational measures and recommendations which could make the proposed development more sustainable (e.g. electrical charging points). However, the plans submitted do not demonstrate that many of these measures are to be incorporated into the scheme. The application has therefore failed to incorporate many recommendations set out in the Sustainability Statement which could have made the development more sustainable. It is considered that some of the measures identified could be secured by way of condition. However, in order to ensure the development is truly sustainable in the long term, such measures should have been designed into the scheme at an early stage in the process.

7.17 Flooding or Drainage Issues

FLOODING AND DRAINAGE

Para. 155 of the NPPF says that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Policy 5.12 of the London Plan seeks to address current flood issues and minimise risk in a sustainable way. Policy EM1 of Local Plan Part 1 says that the Council will require major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption. Draft policy DMEI 9 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with modifications (March 2019) seeks to divert development away from areas at risk of flooding.

The Environment Agency has been consulted on the application and objected to the application for two main reasons which were 1) No Preliminary Risk Assessment (PRA) has been submitted; and 2) insufficient information on the proposed drainage scheme has been submitted to determine risks to potable water supplies. The Environment Agency's full comments can be found above in the External Consulttee section.

The Council's Flood Risk team were also consulted on the application and provided the following comments:

'The site is shown to be a dry island surrounded by Flood Zone 3 of the River Colne. Other than the access road to the north-east, the site is entirely surrounded by permanent water features including Springwell Lake along the western side and two channels of the River Colne on the northern and southern boundaries. The applicant has submitted a Flood Risk and Surface Runoff Assessment (UK Flood Risk Consultants - Revision 1.0, Dated September 2018) to support the application. The FRA includes information provided by the Environment Agency; however, it incorrectly identifies model node UCL70_8906 as being the closest to the site. There is a separate channel of the River Colne along the eastern site boundary that is closer to the site and has higher modelled flood water levels. The impact of this decision is that in the 1 in 1000 year event the flood water level for the northern part of the site will be 43.167m AOD as opposed to the reported 42.74m AOD. In addition, the FRA has not provided sufficient information to demonstrate that the location and height of proposed pods are above the modelled flood water levels. A topographic survey has been provided in Appendix B of the FRA for the north of the site close to the existing buildings, but there is no information regarding the existing ground levels for the southern half of the site where the majority of the glamping pods are proposed.

We therefore do not have sufficient confidence that all the required levels are above the modelled flood water level to confirm that the critical locations and heights of the pods are appropriate and in Flood Zone 1. In line with NPPF Flood Risk and Coastal Change Table 2, the development is classified as "Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan."

The Flood Risk Assessment includes a Flood Emergency Plan as Appendix D. This Flood Emergency Plan is a generic document that is not considered to be relevant to the use of the site for glamping. For example, Section 3 states that residents will sign up to receive flood warnings from the Environment Agency but this is considered to be unfeasible for short-term holiday lets.

In addition, the Flood Emergency Plan primarily considers the direct risk of flooding to the site rather than the risk of flooding for access and egress in the event of a flood in the local area. The Environment Agency information provided in Appendix B shows that the main access and egress to/from the site via Springwell Lane is expected to flood during the 1 in 5 year event. It is not currently recommended in the Flood Evacuation Plan to evacuate residents at any point on receipt of warnings or alerts from the Environment Agency. The only specific actions are that residents will be asked to move their cars to higher ground and not walk through flood water on site.

There is no requirement to evacuate the site in advance of a flood to avoid the residents being cut off from emergency services by flood water. In addition, it is acknowledged in the marked evacuation route that there are two river crossings between the site and dry land and that "residents should be very careful about the potential risk of flooding especially when crossing the river".

The Council would have serious concerns that this will increase the burden on emergency services if the site is permitted and then if the site was not closed and evacuated upon receipt of any flood alert or warning from the Environment Agency. The Flood Emergency Plan has a section regarding the preparedness of occupants for a flood and advises that occupants prepare a 'flood kit' to "last them for several days if the building becomes surrounded by flood water". In the context of a glamping site it is not clear if the 'flood kit' will be provided in the visitors centre for all occupants or if it will be for each glamping pod.

Surface Water Management

The proposed development will include additional hardstanding from parking areas, as well as requiring positive drainage from the roof of the visitors centre and from the glamping pods. Whilst the FRA contains a section on the management of surface water, including the use of permeable pavements and drainage the visitors centre to a reed bed, there is not sufficient information to demonstrate that runoff from the site will not increase. The site is believed to have been artificially raised as it lies above surrounding ground levels. Whilst it may not emerge at the surface other than during fluvial flood events, there is known to be high groundwater in the floodplain of the River Colne as there is a considerable proportion of gravels that have historically been extracted. The proposals for the management of surface water have not considered the potential for high groundwater limiting the amount of available surface water storage. There is also no information regarding the proposals of managing runoff from the glamping pods.

The proposed reeds beds are located in an area in the Arboricultural Impact Assessment where there is tree protection fencing and root protection areas. It is critical the Council can review the proposed details (level of invert arrangement etc) of the outfalls which have not been provided from the reed bed into the nearby channel of the River Colne. This is important regarding the frequency the outfall will be inundated by flood water from the River Colne if it is to be a lowered area'.

In summary, the site is shown to be a dry island surrounded by Flood Zone 3 of the River Colne. The proposed development has failed to provide an adequate Flood Emergency Plan. Furthermore the FRA does not provide sufficient information to demonstrate that surface water runoff from the site will not increase as a result of the proposed development or that the location and height of proposed pods are above the modelled flood water levels.

The site is located within Source Protection Zone (SPZ) 1 and upon a principal aquifer (with the secondary aquifer in hydraulic continuity with the principal aquifer). In light of this the proposed development has failed to provide a Preliminary Risk Assessment (PRA) to address the possible risk to controlled waters and has submitted insufficient information on the proposed drainage scheme to determine risks to potable water supplies *SPZ 1.

The proposed development therefore raises significant issues with regards to surface water runoff, flood risk and risk to human safety and has failed to address the possible risk to controlled waters and potable water supplies. The proposed development is therefore contrary to Paragraph 155 of the NPPF, Policy 5.12 of the London Plan, Policy EM1 of Local Plan Part 1 and Draft policy DMEI 9 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with modifications (March 2019).

7.18 Noise or Air Quality Issues

Noise and disturbance

Hillingdon Local Plan: Part 2 - Saved UDP Policy OE1 says that planning permission will not normally be granted for uses which are detrimental to the character or amenities of

surrounding properties or the area generally, because of:

- (i) the siting or appearance;
- (ii) the storage or display of vehicles, goods, equipment or other merchandise;
- (iii) traffic generation and congestion;
- (iv) noise and vibration or the emission of dust, smell or other pollutants, unless sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable.

Policy OE3 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to avoid development which would cause noise annoyance unless the impact is appropriately mitigated.

The nearest residential properties are located at The Lock Cottages which are approx. 27m from the site and which would be approx. 54m away from the nearest 'glamping pod'. Also nearby are the properties at Willow Court and Ridge House. The petition signed by 36 residents and submitted in objection to this application raised concerns relating noise that could be generated by campers using the site, particularly late into the evening. Little information has been provided with regards to additional tents or vehicles (e.g. camper vans) likely to use the site in addition to the proposed 'glamping pods' and so expected numbers are difficult to ascertain. Should permission be granted for change of use of the site to Use Class D2 it would be difficult to restrict and/or manage aspects such as additional tents or vehicles (e.g. camper vans) likely to use the site (in addition to the 'glamping pods'). The change of use of the site for D2 use therefore raises concerns with regard to the amenity currently enjoyed by nearby residents contrary to Hillingdon Local Plan: Part 2 - Saved UDP Policy OE1.

Coupled within this, the lack of detail submitted within the applicant's submission in relation to existing and proposed vehicular movements into the site means it has not been possible to quantify and assess the potential harm and consider any mitigation.

Air quality

Paragraph 180 of the NPPF says that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

Paragraph 170 (e) of the NPPF says that planning policies should contribute to and enhance the natural environment by (amongst other things) 'preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans'.

Policy OE1 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) states that 'planning permission will not normally be granted for uses and associated structures which are, or are likely to become, detrimental to the character or amenities of surrounding properties or the area generally, because of (amongst other things) (iv) noise and vibration or the emission of dust, smell or other pollutants, unless sufficient measures are taken to mitigate the environmental impact of the

development and ensure that it remains acceptable.

Policy DMEI 14 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019) relates to air quality and says (amongst other things) that 'Development proposals should as a minimum include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new'.

The proposed plans include a biomass boiler within the visitors centre. No details of the likely emissions have been submitted as part of this application and so it is not possible to make a proper assessment of the likely impacts. However, previous use of a biomass boiler on site has generated objections to this proposal on the basis that the smoke generated meant some neighbouring properties could not open their windows.

Based on the information provided and the concerns regarding the biomass boiler and the proximity of nearby residents it is considered that the proposal could potentially lead to an unacceptable impact on the amenity of neighbouring residents contrary to Policy OE1 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and Policy DMEI 14 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

In addition to the above, it is possible that because the biomass boiler requires fuel, the delivery of such fuel would add to the vehicular trips to and from the site. However, this cannot be assessed as part of the application as no details have been provided. It should be noted that during a site visit there was evidence of open storage of wood on the site and the Applicant confirmed that local Tree Surgeons delivered wood to the site on a regular basis and some also used the site for storage of vehicles and equipment. However, none of this information features in the application documentation so cannot justifiably form part of the assessment.

The lack of detail submitted within the applicant's submission in relation to existing and proposed vehicular movements into the site means it has not been possible to quantify and assess whether the development proposal would result in an unacceptable risk from air pollution given that the site seeks unrestricted vehicle movements to secure a campsite, it is highly likely that the works would lead to a risk of air pollution.

7.19 Comments on Public Consultations

Points raised as result of the public consultation have been addressed in the relevant sections above and the reasons for refusal attached to this recommendation.

7.20 Planning Obligations

TfL has requested that a Travel Plan be produced and submitted to the Council for consideration. Had this proposals been recommended for approval, this matter would have been subject to a section 106 planning obligation. In addition, other matters may have required a financial contribution, such as air quality or highways works, however due to the submission of insufficient information, an assessment on the need for mitigation and contributions is not able to be made.

If the application was acceptable in other respects, a Travel Plan would be required, and this would need to be provided for in a section 106 planning obligation. In addition, off-site mitigation for impacts on the Blue Ribbon Network, air quality, highways and ecological works may also have been required, however as noted in the Council's report, there is currently insufficient information to assess the proposals impacts and therefore it is not considered that this would outweigh the impacts of the scheme, a planning obligation has not been completed, contrary to Policy R17 of the Hillingdon Local Plan: Part Two - Saved

UDP Policies (2007), Policy 8.2 of the London Plan 2016 and the provisions of the London Borough of Hillingdon Planning Obligations SPD (2014).

7.21 Expediency of enforcement action

As stated in the above report, enforcement action has previously been quashed by the Planning Inspectorate and there is currently two outstanding appeals with the Planning Inspectorate regarding the residential units and the biomass boiler.

7.22 Other Issues

Description of Development

For clarification purposes, this report is assessing all works indicated on the plans and the LPA therefore consider a more accurate description of development for this application to be:

"Retention of 2 x single family dwellinghouses and biomass boiler located to the north of the site, change of use of the southern part of the site to Use Class D2 for Glamping/Camping purposes, comprising the erection of Glamping Pods/Mobile Homes, a fixed construction visitor centre, Oak Gazebo viewing platform and the creation of a surface level car park in association with the proposed D2 use."

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

CONCLUSION

Impact on the Green Belt

Overall the development would result in an increase of built footprint of approx. 127sqm. The footprint of the visitors centre would be 328sqm which is considered excessive for the proposed use. Furthermore the height of visitors centre would be approx. 5.3m which is unjustified for a single storey building. In addition to the size of the visitors centre, the planning application seeks change of use of the whole site to D2 campsite and so the unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents could result in excessive visual clutter to the detriment of the Green Belt and the overall appearance of the site if permitted.

Given the overall size of the visitors centre and the potential for further visual clutter, the development is considered to have an unacceptable impact on the openness of the Green Belt.

Residential use on the site

As stated above, there are residential properties on the site with at least one not benefiting from planning permission but which are included within the red line. Although these properties fall within the red line plan, no reference to these properties has been made within the current application. Because no information has been submitted a full assessment is not possible. However, it is considered that these properties would contribute to cumulatively to encroachment into the Green Belt and would have a negative impact on the openness of the Green Belt when assessed alongside the proposed visitors

centre and 'glamping pods'.

Flood risk:

The site is shown to be a dry island surrounded by Flood Zone 3 of the River Colne. The proposed development has failed to provide an adequate Flood Emergency Plan. Furthermore the FRA does not provide sufficient information to demonstrate that surface water runoff from the site will not increase as a result of the proposed development or that the location and height of proposed pods are above the modelled flood water levels.

The site is located within Source Protection Zone (SPZ) 1 and upon a principal aquifer (with the secondary aquifer in hydraulic continuity with the Principal aquifer). In light of this the proposed development has failed to provide a Preliminary Risk Assessment (PRA) to address the possible risk to controlled waters and has submitted insufficient information on the proposed drainage scheme to determine risks to potable water supplies *SPZ 1.

The proposed development therefore raises significant issues with regards to surface water run off, flood risk and risk to human safety and has failed to address the possible risk to controlled waters and potable water supplies.

Biomass Boiler

The proposed plans include a biomass boiler within the the visitors centre. No details of the likely emissions have been submitted as part of this application and so it is not possible to make a proper assessment of the likely impacts. However, previous use of a biomass boiler on site has generated objections to this proposal on the basis that the smoke generated meant some neighbouring properties could not open their windows. Based on the information provided and the concerns regarding the biomass boiler and the proximity of nearby residents it is considered that the proposal could lead to an unacceptable impact on the amenity of neighbouring residents.

Highways and parking

As stated above, the existing land use on the site is not clear. The most recent permission is that for use as a garden centre which included on-site parking for 28 cars. However, it is clear that the garden centre has not been operational for some time and despite enforcement action and appeals, the permitted use is still unclear. TfL have objected to the level of on site car parking proposed. The Council's highways team have raised no objection to the scheme. However, as the planning application seeks change of use of the whole site to D2 campsite concerns have been raised by local residents regarding the unrestricted use of associated vehicles (e.g. camper vans and/or American RVs) and additional tents which could result in more vehicular activity than expected. Furthermore the biomass boiler may generate further trips as would the storage of wood, vehicles and equipment related to the biomass boiler use.

On balance it is considered that the application provides insufficient evidence and data regarding both the existing and proposed use and therefore existing car parking and trip generation cannot be used to determine whether the proposals would have a negative impact on local transportation and highway compared to the existing use. On this basis and taking account of the comments submitted by TfL the proposal is considered unacceptable as insufficient information has been provided.

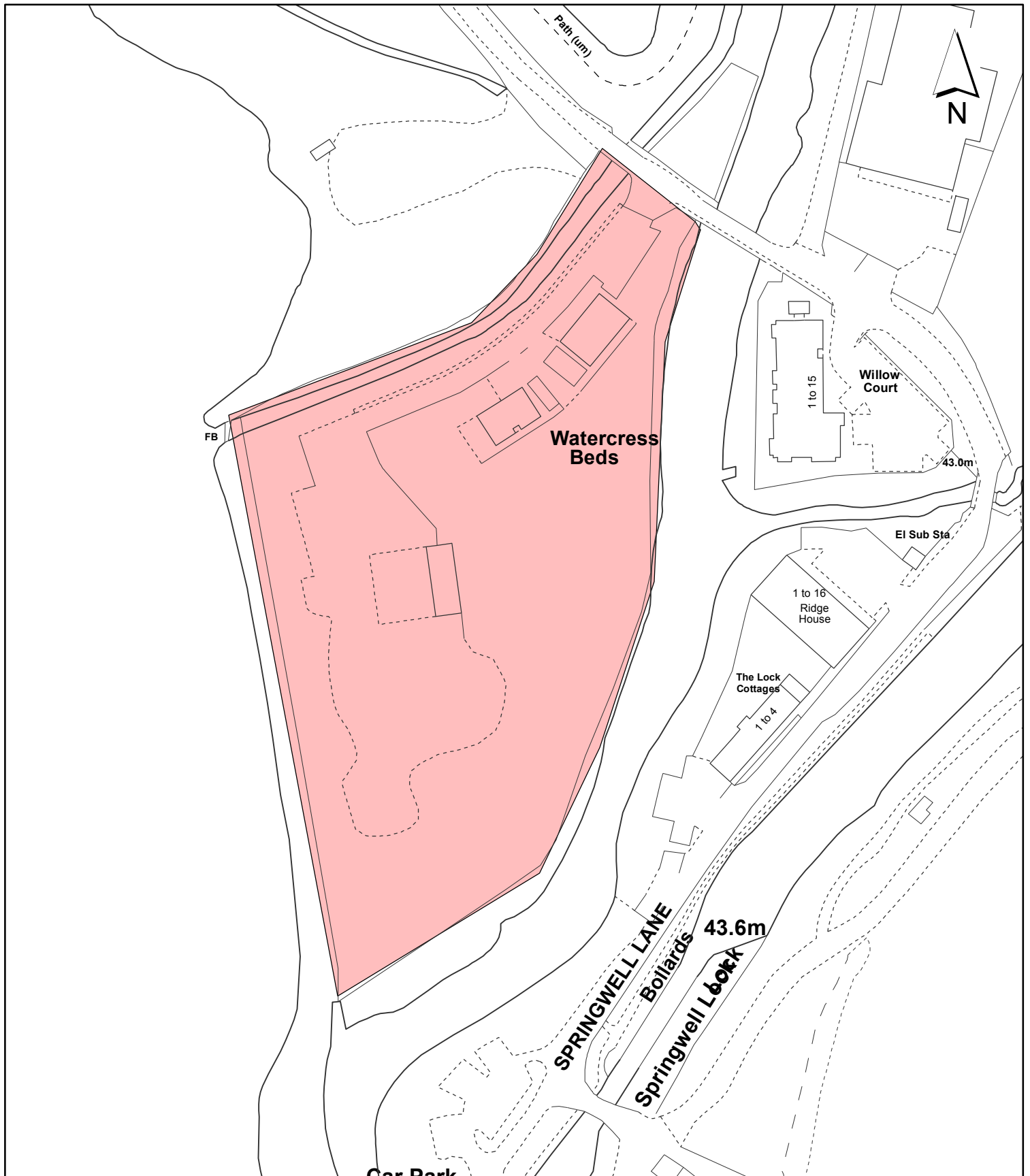
For the reasons set out above the application is recommended for Refusal.

11. Reference Documents

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) 2019
Emerging Hillingdon Local Plan: Part 2 - Development Management Policies with modifications (March 2019)
Emerging Hillingdon Local Plan: Part 2 - Policies Map
Planning Practice Guidance (Flood Risk and Coastal Change March 2014)

Contact Officer: Faye Mesgjan

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Notes:

 Site boundary

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Site Address:
**Watercress Beds
 Springwell Lane
 Harefield**

Planning Application Ref:
24597/APP/2018/2373

Planning Committee:
Major

Scale:
1:1,250

Date:
November 2019

**LONDON BOROUGH
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