

## Report of the Head of Planning, Transportation and Regeneration

<b>Address</b>	HILLINGDON HOSPITAL PIELD HEATH ROAD HILLINGDON		
<b>Development:</b>	Erection of a temporary single storey prefabricated system building, together with a link to the AMU building, with a total floor area of 743 sq.m, to provide for a 20 bed space decant and winter overspill ward, including 4 parking spaces; demolition of Building 17 and the creation of 30 replacement staff car parking spaces; reconfiguration of the parking area to the east of the Womens' Services Building resulting in a net provision of 11 replacement visitor parking spaces		
<b>LBH Ref Nos:</b>	4058/APP/2019/3286		
<b>Drawing Nos:</b>	Addendum to Workplace Travel Plan Clinical Justification Planning Statement Flood Risk Assessment (Ref: CV8190857/AQ/DW/001) 2002 Rev. P3 2003 Rev. P2 2004 Rev. P2 4002 Rev. P3 5001 Rev. P2 5003 Rev. P1 HD11471_02 (Proposed Elevations) HD11471_02 Rev. C (Proposed Floor Plan) Design and Access Statement 2001 Rev. P1 2000 Rev. P2 Cover Letter/Statement (Ref: 34380/1) Letter dated 11 December 2019		
<b>Date Plans Received:</b>	08/10/2019	<b>Date(s) of Amendment(s):</b>	12/12/2019
<b>Date Application Valid:</b>	08/10/2019		11/12/2019 08/10/2019 09/10/2019

### 1. SUMMARY

This application seeks planning permission for the construction of a single storey flat roofed prefabricated system building, to accommodate a 750 sq m, 20 bed ward. The ward accommodation will address demand for additional ward accommodation during the winter months, whilst during the summer months, it will be used as a decant ward to accommodate the refurbishment and maintenance of other wards. The Trust will lease the building initially for 5 years with an option to purchase for a longer term.

The proposed building will be located centrally within the hospital site and will result in the loss of 45 spaces on an existing car park, which will be reprovided in three main locations within the hospital site.

An existing S106 Agreement covering the hospital site states that no planning application that involves additional internal floorspace of greater than 250 sqm being created shall be submitted prior to the Council's written approval of an over-arching masterplan

demonstrating how the Hospital as a whole will be redeveloped in a phased, coherent, sustainable strategic and comprehensive manner (the Strategic Master Plan).

The Trust advises that some preliminary work on the Strategic Masterplan has been started. However this work has not been completed at the time of the application and the Trust is under pressure to have the overspill and decant ward available for use this winter. The Trust has therefore requested that the requirements of the S106 agreement do not apply to the proposed ward. The nature of the building is that it is a pre fabricated structure not intended to be a permanent feature of the site, so placing it in this location does not prejudice the outcome of a future masterplan. If future large scale buildings ie larger than 250 sq meters, are proposed on the site, then the Trust accepts that the obligations of the S106 Agreement will still apply.

In light of the above, a deed of variation to the 2013 legal agreement (the Principal Agreement) is recommended, which would allow the current scheme to proceed in this instance, but would preserve the restrictions set out in the 2013 Agreement in all other respects.

The scheme would not have an adverse impact upon neighbouring residential properties from an amenity perspective or impact adversely on surrounding streets in terms of visual amenity, traffic congestion or pressure upon on-site car parking.

Officers consider that the benefits, on grounds of clinical and locational need, when weighed against the drawbacks of the proposed development are significant and therefore, this would outweigh the ad hoc development of the hospital site and loss of soft landscaping arising from the proposed development.

It is considered that the scheme can satisfactorily address highway, landscape, drainage and flood related issues, Accordingly, approval is recommended, subject to appropriate conditions and legal agreement.

## **2. RECOMMENDATION**

**A. That the Council enters into a legal agreement with the applicant under Section 106 of the 1990 Town & Country Planning Act (as amended) or other appropriate legislation to secure:**

**1. An updated Site Wide Travel Plan**

**2. To allow the current scheme to proceed in this instance, but preserve the restrictions set out in the 2013 Agreement (the Principal Agreement) attached to planning permission ref:4058/APP/2013/99 in all other respects. The Deed of Variation will vary the Principal Agreement by reference to the specific area shown on a plan, and in all other respects the Principal Agreement will remain unchanged.**

**3. A contribution of £10,000 towards off-site environmental enhancements, including tree planting at the neighbouring public open space, Colham Green Park, to offset the tree loss in the application site and grassed areas lost by new car parking bay provision.**

**B. That officers be authorised to negotiate and agree the detailed terms of the proposed agreement.**

**C. That if any of the heads of terms set out above have not been agreed and the S106 legal agreement has not been finalised by the 31 March 2020, or any other period deemed appropriate by the Head of Planning, Transportation and Regeneration, then delegated authority be granted to the Head of Planning, Transportation and Regeneration to refuse the application for the following reason:**

**'The development has failed to secure obligations relating to travel plans (including servicing and delivery plans), off site tree planting mitigation, strategic site wide master-planning to ensure the future on going successful phased re-development of the Hillingdon Hospital site. Accordingly, the proposal is contrary to policies R17, BE13, BE19, BE38, AM7, AM13, of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), of PR21 Saved Policy of the UDP, emerging Local Plan Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and London Plan Policies 5.3, 7.2, 7.4, 7.5 and 7.**

**D. That subject to the above, the application be deferred for determination by the Head of Planning, Transportation and Regeneration under delegated powers, subject to the completion of the legal agreement under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the applicant.**

**E. That if the application is approved, the following conditions be imposed**

**1 COM3 Time Limit**

The decant and winter ward building and use hereby permitted shall be discontinued and the land restored to a condition to be agreed with the Local Planning Authority on or before the expiration of the period of 5 years from the date of this decision, in accordance with a scheme of work that shall first have been submitted to and approved in writing by the Local Planning Authority.

**REASON**

1. The development is by definition a non permanent fixture and it is not envisaged as a permanent structure, in order to comply with the terms of the application, in order not to prejudice the outcome of a future masterplan and to accord with Policies OE1 and AM7 of the the Hillingdon Local Plan: Part 2 -Saved UDP Policies (November 2012).

**2 COM4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers 2002 Rev. P3, 2003 Rev. P2, 2004 Rev. P2, 4002 Rev. P3, 5001 Rev. P2, 5003 Rev. P1, HD11471\_02 (Proposed Elevations) and HD11471\_02 Rev. C (Proposed Floor Plan) and shall thereafter be retained/maintained for as long as the development remains in existence.

**REASON**

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (2016).

**3 COM5 General compliance with supporting documentation**

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

Addendum to Workplace Travel Plan

Flood Risk Assessment (Ref: CV8190857/AQ/DW/001)

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

#### REASON

To ensure that the development complies with the objectives of Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.12 Flood Risk Management of the London Plan (March 2016), Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019), Policy 5.15 Water use and supplies of the London Plan (March 2016), the National Planning Policy Framework and the Planning Practice Guidance (March 2014).

#### **4 COM8 Tree Protection**

No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.

The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

- 2.a There shall be no changes in ground levels;
- 2.b No materials or plant shall be stored;
- 2.c No buildings or temporary buildings shall be erected or stationed.
- 2.d No materials or waste shall be burnt; and
- 2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

#### REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy DMHB 1 of the Hillingdon Local Plan: Part Two Development Management Policies With Modifications (March 2019).

#### **5 COM9 Landscaping (car parking & refuse/cycle storage)**

A landscape scheme shall be submitted to and approved in writing by the Local Planning Authority before the relevant part of the work is begun. The scheme shall include:

1. Details of Soft Landscaping
  - 1.a Planting plans (at not less than a scale of 1:100),

1.b Written specification of planting and cultivation works to be undertaken,  
1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

## 2. Details of Hard Landscaping

2.a Refuse Storage

2.b Car Parking Layouts for 45 parking bays, including 5 disabled parking bays and demonstration that 18 of the parking spaces are served by an electrical charging point (9 active and 9 passive)

2.c Hard Surfacing Materials

2.d External Lighting

2.e 7 Secure cycle storage bays

## 3. Details of Landscape Maintenance

3.a Landscape Maintenance Schedule for a minimum period of 5 years.

3.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

## 4. Schedule for Implementation

## 5. Other

5.a Existing and proposed functional services above and below ground

5.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

## REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies BE13, BE38 and AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Policies DMHB 1, DMHB 4, DMHB 11 DMHB 14 of the Hillingdon Local Plan: Part Two Development Management Policies With Modifications (March 2019) and Policy 5.17 (refuse storage) of the London Plan (2016).

## **6 COM10 Tree to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs.'

Remedial work should be carried out to BS BS 3998:2010 'Tree work -

Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

#### REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and to comply with Section 197 of the Town and Country Planning Act 1990.

#### **7 COM14 No additional internal floorspace**

Notwithstanding the provisions of Section 55 of the Town and Country Planning Act 1990 (or any others revoking and re-enacting this provision with or without modification), no additional internal floorspace shall be created in excess of that area expressly authorised by this permission.

#### REASON

To enable the Local Planning Authority to assess all the implications of the development and to ensure that adequate parking facilities can be provided on the site, in accordance with Policies AM14 and AM15 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### **8 COM15 Sustainable Water Management**

Notwithstanding the submitted plans, prior to commencement of external works, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site, in accordance with Policy 5.15 of the London Plan and will:

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

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

#### REASON

i) To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding in accordance with Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) and Policy 5.12 Flood Risk Management of the London Plan (March 2016), Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019)

ii) To ensure that surface water run off is handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), and

iii) To conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016), the National Planning Policy Framework (March 2012), and the Planning Practice Guidance (March 2014).

**9 COM31 Secured by Design**

The building shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

**REASON**

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to reflect the guidance contained in the Council's SPG on Community Safety By Design and to ensure the development provides a safe and secure environment in accordance with London Plan (2016) Policies 7.1 and 7.3.

**10 H10 Parking/Turning/Loading Arrangements - Commercial Devs.**

Notwithstanding the submitted plans, the approved development shall not be brought into use until the traffic arrangements (including where appropriate carriageways, footways, turning space, safety strips, sight lines at road junctions, kerb radii, car parking areas and marking out of spaces, loading facilities, closure of existing access and means of surfacing) have been constructed in accordance with the approved details. Thereafter, the parking areas, sight lines and loading areas must be permanently retained and used for no other purpose for the lifetime of the development. Disabled parking bays shall be a minimum of 4.8m long by 3.6m wide, or at least 3.0m wide where two adjacent bays may share an unloading area.

**REASON**

To ensure pedestrian and vehicular safety and convenience and to ensure adequate off street parking, and loading facilities in compliance with Policies AM14 and AM15 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Policies DMT 1, DMT 2 and DMT 6 of the the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019) and Chapter 6 of the London Plan (2016).

**INFORMATIVES**

**1 I52 Compulsory Informative (1)**

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

**2 I53 Compulsory Informative (2)**

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

alterations since 2011 (2016) and national guidance.

AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
R10	Proposals for new meeting halls and buildings for education, social, community and health services
R16	Accessibility for elderly people, people with disabilities, women and children
R17	Use of planning obligations to supplement the provision of recreation leisure and community facilities
OE1	Protection of the character and amenities of surrounding properties and the local area
DMCI 2	New Community Infrastructure
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMHB 14	Trees and Landscaping
DMT 2	Highways Impacts
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
LPP 5.3	(2016) Sustainable design and construction
LPP 5.12	(2016) Flood risk management
LPP 7.3	(2016) Designing out crime
LPP 7.14	(2016) Improving air quality
LPP 8.3	(2016) Community infrastructure levy
NPPF	National Planning Policy Framework

### **3**        I59                    **Councils Local Plan : Part 1 - Strategic Policies**

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

### **4**        I13                    **Asbestos Removal**

Demolition and removal of any material containing asbestos must be carried out in accordance with guidance from the Health and Safety Executive and the Council's



Environmental Services. For advice and information contact: - Environmental Protection Unit, 3S/02, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 277401) or the Health and Safety Executive, Rose Court, 2 Southwark Bridge Road, London, SE1 9HS (Tel. 020 7556 2100).

## **5            114            Installation of Plant and Machinery**

The Council's Commercial Premises Section and Building Control Services should be consulted regarding any of the following:-

The installation of a boiler with a rating of 55,000 - million Btu/hr and/or the construction of a chimney serving a furnace with a minimum rating of 1/4 million Btu/hr;

The siting of any external machinery (eg air conditioning);

The installation of additional plant/machinery or replacement of existing machinery.

Contact:- Commercial Premises Section, 4W/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250190). Building Control Services, 3N/01, Civic Centre, High Street, Uxbridge, UB8 1UW (tel. 01895 250804 / 805 / 808).

## **6            115            Control of Environmental Nuisance from Construction Work**

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance 'The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit ([www.hillingdon.gov.uk/noise](http://www.hillingdon.gov.uk/noise) Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

## **7**

1. The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

2. Fixtures, fittings and furnishings, particularly hard materials should be selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2009+A1:2010, Section 9.1.2, and, BS 223 in selecting an appropriate acoustic absorbency for each surface.

3. Care should be taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, Including appropriate decor to ensure that doors and door furniture can be easily located by people with reduced vision.
4. Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.
5. Care must be taken to ensure that overspill and/or other interference from induction loops in different / adjacent areas does not occur.
6. Flashing beacons/strobe lights linked to the fire alarm should be carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.
7. It is recommended that the Hospital Trust takes full advantage of the opportunity that this development offers, to improve the accessibility of the premises to people with mobility and sensory impairments. Such provisions should include height adjustable adult sized beds, and track ceiling hoists within the larger examination cubicles. Policies, practices and procedures should be put in place and training provided to ensure that staff are familiar with the protocols to direct disabled people to a larger, accessible cubicle.

## 8

In accordance with the provisions of the NPPF, the Local Planning Authority has actively engaged with the applicant both at the pre application and application stage of the planning process, in order to achieve an acceptable outcome. The Local Planning Authority has worked proactively with the applicants to secure a development that improves the economic, social and environmental conditions of the area. In assessing and determining the development proposal, the Local Planning Authority has applied the presumption in favour of sustainable development Accordingly, the planning application has been recommended for approval.

## 3. CONSIDERATIONS

### 3.1 Site and Locality

Hillingdon Hospital is located to the south of Pield Heath Road and consists of a mix of buildings ranging from the 1940's to the present day. The focal point of the present hospital is a ten storey block built in the 1960's, which dominates the surrounding area. It is surrounded by a base of two and three storey development. About 40% of acute beds are in single storey wards built in the 1940's, which are in poor condition. There are a number of ancillary buildings scattered across the site. The remainder of the site consists mainly of car parking, interspersed with pockets of landscaping consisting largely of patches of grass and groups of trees. A partly culverted stream runs across the south east corner of the site.

The proposed ward building would be sited to the south of the AMU building on a car park that is adjacent to the entrance of the Endoscopy Department. This car park is currently used as limited visitor parking and for overspill for hospital transport vehicles.

There are several points of access to the site. The main entrance is from Pield Heath Road with a separate access for A&E. There are three separate accesses from Royal Lane and a separate access from Colham Green Road.

The site has a PTAL rating of 3.

### 3.2 Proposed Scheme

The Hillingdon Hospitals NHS Foundation Trust (The Trust) is applying for planning permission for the erection of a 20 bed decant and winter overflow ward to address additional demand for ward accommodation arises during the winter months, whilst during the summer months it will be used as a decant ward to accommodate the refurbishment and maintenance of other wards. The Trust will lease the building initially for 5 years with an option to purchase for a longer term.

The ward will comprise four small 4-bed wards and four single rooms with ensuite bathrooms, or 20 bed spaces total. The proposed building will be a prefabricated system building featuring a flat roof and will be finished in Goose Wing Grey to harmonise with the adjacent AMU building, which also accommodates the Endoscopy Department on the ground floor. The plant associated with the building will be located in the ground floor plant area to the AMU building and will not be sited on the roof of the proposed ward.

The proposed building will result in the loss of 45 spaces on the existing car park which will be reprovided in three main locations:

1. Demolition of Building 17 (300 m<sup>2</sup>) which is empty. This will create a net provision of 30 spaces. These spaces adjoin the designated staff parking area and will be for staff parking only. To the north of this area is the outpatients car park and the movable barrier between the staff and visitor spaces will be moved to the south to increase the number of visitor spaces.
2. A parking area will be created to the east of the Women's Services Building. This will create 21 spaces less 10 spaces to reconfigure the parking area, resulting in a net provision of 11 spaces. These parking spaces will be for visitors.
3. There will be 4 parking spaces provided to the east of the Decant and Winter overflow Ward.

### 3.3 Relevant Planning History

4058/APP/2013/99 Hillingdon Hospital Field Heath Road Hillingdon  
Demolition of part of the existing kitchen and staff restaurant and erection of a new 2 storey Acute Medical Unit at Hillingdon Hospital (located to the rear, ie. to the south, of the existing 11 storey tower ward block).

**Decision:** 30-07-2013 Approved

4058/APP/2018/1055 Hillingdon Hospital Field Heath Road Hillingdon  
Single storey extension to the Accident and Emergency Department to create an Urgent Care Centre

**Decision:** 31-05-2018 Approved

#### Comment on Relevant Planning History

The larger Hillingdon Hospital site has an extensive, somewhat ad hoc development history. In April 2005, outline planning permission for a comprehensive redevelopment of the site was granted, in which a phased redevelopment of the site was envisaged, funded by PFI. However, due to the changing economic climate, a redevelopment of that scale will not now come forward in the foreseeable future.

Since then, a number of more minor developments have come forward, the most recent being the two storey Acute Medical Unit (AMU) granted in August 2013 (App. No. 4058/APP/2013/99 refers). A S106 agreement attached to this consent entered into by the Hospital Trust effectively restricts schemes for additional floor space over 250 sqm unless progress on a Masterplan for the re-development of the hospital site can be demonstrated through a review mechanism.

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

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

1.2 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)

1.3 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

1.4 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)

1.5 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. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor is currently considering the Panel report and recommendations and is preparing an 'Intend to Publish' version of the London Plan, which will be sent to the Secretary of State alongside with a schedule of the panel's recommendation and the Mayor's response to them. It is envisaged the Intend to 'Publish version' of the Plan will be sent to the Secretary of State by the end of the year.

1.7 Until the stages outlined above are passed only limited weight should be attached to the new London Plan. Some greater weight can be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made) or are

subject to only minor amendment. However, anything that remains subject to the Inspector's recommendations can only attract very limited weight until the Mayor has published his report. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process.

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

1.8 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.

1.9 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.

1.10 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.

1.11 The Council received the Inspector's Final Report on 22 October 2019. The Inspector concluded that, subject the Main Modifications set out in the Appendix to the report, the LPP2 is a sound plan that can be adopted. The examination of the Local Plan is therefore now complete and the Council is in the process of preparing for the formal adoption of the LPP2 in accordance with the statutory requirements. Formal adoption is scheduled for January 2020.

1.12 When applying paragraph 48 of the NPPF the Council's approach to the weight that should be afforded to the LPP2 until formal adoption will be that all policies, including those incorporating the main modifications, hold substantial weight. This is due to the LPP2 being at the most advanced stage of preparation, the resolution of outstanding objections through the Inspector's Report and confirmation that the LPP2 is consistent with the NPPF.

1.13 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 until the LPP2 is formally adopted.

### **UDP / LDF Designation and London Plan**

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

Part 1 Policies:

- PT1.E7 (2012) Raising Skills
- PT1.BE1 (2012) Built Environment
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.CI1 (2012) Community Infrastructure Provision

Part 2 Policies:

AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
R10	Proposals for new meeting halls and buildings for education, social, community and health services
R16	Accessibility for elderly people, people with disabilities, women and children
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
OE1	Protection of the character and amenities of surrounding properties and the local area
DMCI 2	New Community Infrastructure
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMHB 14	Trees and Landscaping
DMT 2	Highways Impacts
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
LPP 5.3	(2016) Sustainable design and construction
LPP 5.12	(2016) Flood risk management
LPP 7.3	(2016) Designing out crime
LPP 7.14	(2016) Improving air quality
LPP 8.3	(2016) Community infrastructure levy
NPPF	National Planning Policy Framework

## **5. Advertisement and Site Notice**

**5.1** Advertisement Expiry Date:- **12th November 2019**

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

## **6. Consultations**

### **External Consultees**

19 neighbouring properties have been consulted on this application and a site notice with a closing date of 08-11-19 was displayed. The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015. No responses have been received to the public consultation.

## **Internal Consultees**

### **HIGHWAY ENGINEER**

#### **Site Characteristics & Background**

The proposal is for the provision of a temporary 5 year lease single storey build (GIFA- 743m2) which would provide a 20 bed space decant and overspill facility. The build would result in a net loss of some 45 existing car park spaces which are currently used for visitors and hospital transport vehicles. These 'lost' spaces are proposed to be replaced with a repositioning of 4 disabled compliant parking spaces in proximity of the new build and scattering of the remaining 41 spaces across the Hospital site with 21 new visitor spaces adjacent to the maternity block (to the east of the proposal site) and 34 new staff spaces in the vicinity of building 17 which is to be demolished and is currently located north-west of the proposal site.

#### **Parking Provision**

The 45 'lost' car park spaces that would result due to the new build proposal would be replaced in the areas highlighted in the previous paragraph. The relocations are considered suitable and workable and would limit the likelihood of informal injudicious parking within the Hospital grounds. The proposal is welcomed and therefore considered acceptable.

#### **Staff Cycle Parking**

Within the provisions of the emerging Local Plan Part 2 standards, there is a requirement to provide 1 space per 5 staff and 1 space per 10 visitors. All provisions should be located in areas which are secure and accessible. This has not been indicated but can be secured via planning condition.

#### **Workplace Travel Plan (WTP)**

It is noted that as there is no overarching hospital master plan. In an ideal situation it would be appropriate to incorporate this proposal within an existing WTP. Henceforth as the GIFA of the proposal site falls well below the threshold requirement for a WTP to be put in place, all that is required is for the applicant to provide a WTP statement of intent to promote sustainable travel in conformity with current Transport for London (TfL) travel plan guidance.

#### **Conclusion**

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any highway safety concerns, in accordance with Policies AM2, AM7 and AM14 of the Development Plan (2012) and emerging Local Plan Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan (2016).

### **FLOOD AND DRAINAGE OFFICER**

The Flood Risk Assessment submitted by Glanville dated September 2019 is not adequate to demonstrate the flood risks can be managed appropriately. Further detail is stated will be provided following surveys to be undertaken but this need to be provided in a drainage strategy at application stage as it is a material planning consideration.

The key risk to this site is the risk from surface water as well as ordinary watercourse which runs through the site and is not mentioned.

In section 5.7 "The proposed development will not involve an increase in the current impermeable area and, therefore, there will be no increase in surface water runoff and no increase in flood risk downstream". There is no understanding that the current private drainage system functions appropriately to connect into. There is also shown to be an existing substantial risk of surface water

ponding on the location proposed for the temporary building. These proposals would push this water elsewhere in the site causing flooding to other parts of the hospital.

A large site of this size must meet current government standards for drainage, which requires betterment in any design. This is particularly pertinent when a number of properties downstream have flooded from the overwhelming of the watercourse from heavy rain.

#### TREE AND LANDSCAPE OFFICER

This application affects three separate zones within the complex of buildings and open spaces at Hillingdon Hospital. The hospital has two areas which are protected by tree preservation orders, TPO 411 and TPO 623.

COMMENT: No protected trees will be affected by the proposal. No tree report has been submitted, however, it is evident that tree loss and the loss of open space will be required to facilitate the proposed built development and replacement parking. The development represents yet another fragment of piecemeal development which is steadily eroding the green infrastructure and environmental quality of the hospital grounds. The proposed development results in a net loss of open space and trees which cannot be replaced within the site.

RECOMMENDATION: If this application is to be approved, condition RES9 (parts 1,2 and 5 should be imposed. In order to mitigate the loss of green space and planting, a S.106 agreement should secure off-site environmental enhancements, including tree planting, at the neighbouring public open space, Colham Green Park. A contribution of £10K to Green Spaces is recommended.

#### ACCESS OFFICER

I have considered the detail of this planning application and deem there to be no accessibility issues raised by the proposal. However, the following informative should be attached to any grant of planning permission: The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people

## **7. MAIN PLANNING ISSUES**

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

The NPPF generally seeks to safeguard existing community facilities and services and seeks to ensure that they are able to develop and modernise in a sustainable way. The NPPF also encourages transport solutions which support a reduction in greenhouse gas emissions and reduce congestion.

The London Plan seeks to promote the continued role of London as a national and international centre of medical excellence and specialised facilities, promoting expansion where appropriate. It goes on to advise that the networks, research and associated facilities that support London's role as a centre of medical excellence should be supported. London Plan Policy 3.17 (Health and Social Care Facilities) supports development proposals providing high quality health facilities in areas of identified need with regard to the Mayor's Best Practice Guidance on Health Issues in Planning. The Mayor will support the provision of high quality health and social care appropriate for a growing and changing population.



Local Plan: Part 1 Policy CI1 (Community Infrastructure Provision) supports the retention and enhancement of existing community facilities; the location of health and other facilities in accessible locations; and providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status.

Hillingdon Hospital is located within the 'developed area' and is covered by site specific Policy PR21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

Policy PR21 states "At the Hillingdon Hospital site, the Local Planning Authority will encourage redevelopment where appropriate for health purposes associated with Hillingdon Hospital subject to key provisos including:-

- Comprehensive proposals showing the health authority's intention for the whole site;
- Appropriate phasing including the provision of associated access, servicing, car parking provision and landscaping in accordance with current policies and standards;
- Safeguarding and improvement of local residential amenity."

Policy R10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (Nov 2012) states that the local planning authority will regard proposals for new health services as acceptable in principle subject to other relevant adopted policies..

Emerging Local Plan: Part 2 Policy DMC I2 (New Community Infrastructure) supports proposals for the refurbishment and re-use of existing premises for community facilities, as well as the provision of new facilities provided: they are located within the community they are intended to serve; they provide inclusive, accessible, flexible buildings to meet the needs of intended occupants; they are sited to maximise shared use of the facility; and the make provision for community access to the facilities provided.

#### Clinical Justification

Hillingdon Hospital has an ongoing programme of capital investment in building and works. As part of that programme, it undertakes a rolling programme of maintenance and deep cleaning of existing wards. This requires that wards are emptied for several months at a time to undertake these works. During this time alternative ward accommodation is required. In addition, during the winter months of November to March there is an increase in patients attending the hospital, particularly as a result of Norovirus and Flu. This results in a demand for additional ward accommodation. The hospital is operating at near to full capacity, so additional ward accommodation is required at this time of year.

In order to address these dual requirements, the Trust propose to construct the 20 bed Decant and Winter overspill Ward. It will be used as a Winter overspill Ward from November to March and during the summer months will be used as Decant ward, for other wards within the hospital whilst they are fully refurbished or ungraded.

Officers consider that the clinical and operational justification for the ward building is clear and compelling. The proposal will not have any detrimental impact on neighbouring properties and is located in a sustainable location within the urban area and in proximity to a number of bus stops on Field Heath Road. The building is compliant with the above mentioned policies and will provide clear social and health benefits. No objections are therefore raised to the principle of additional health facilities within the hospital grounds.

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

Not applicable to this application.

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

The site does not fall within an archaeological priority area, conservation area, or area of special character.

Policy BE10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that development proposals should not be detrimental to the setting of a listed building. Any development would therefore be expected to address this matter.

To the east of the site is a Grade II Listed Building, The Furze. However this Listed Building is separated from the application site by the car park and is some distance from the application site. It is not considered that the application site is in a sensitive location in terms of heritage assets. There are no objections to the design or siting of the proposed new building in terms of its impact on heritage assets, in compliance with relevant policies.

#### **7.04 Airport safeguarding**

Not applicable to this application.

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

Not applicable to this application.

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

Policies BE13 and BE19 of Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure that new development makes a positive contribution to the character and amenity of the area in which it is proposed. Policy BE13 states that, in terms of the built environment, the design of new buildings should complement or improve the character and appearance of the surrounding area and should incorporate design elements which stimulate and sustain visual interest. Saved Policy BE38 requires new development proposals to incorporate appropriate landscaping proposals.

The new Decant and Overspill Winter Ward would be located centrally within the hospital site, between a single storey annex corridor serving the post WW2 ward bungalows / barracks to the west and the 11 storey tower block to the north. The proposed building will be a prefabricated system building, which is not intended to be a long term permanent structure. The use of modular units provides a design that focuses on efficiency, cleanliness and sustainability. The architecture style is governed by how the modular units are made and transported.

However, the scheme suffers from a shortfall in the provision of a landscaped buffers to the new building, which would abut a retained service yard. Taken together, this in urban design terms is considered to be less than ideal. However, on balance, these deficiencies are not considered sufficient reason to provide a reason of refusal for this scheme that would deliver crucial health service improvements to the hospital.

On balance, officers consider that the benefits, on grounds of clinical and locational need, when weighed against the drawbacks of the proposed development are significant and therefore, this would outweigh the limited harm to the street scene and loss of soft landscaping arising from the proposed development.

Subject to details of external colours and finishes of the proposed building being secured by condition, it is considered that the proposal is consistent with Policies BE13 and BE19 of the Hillingdon Local Plan: Part 2 -Saved UDP Policies (November 2012), and Policy PT1.BE1 (2012 )- Built Environment, Hillingdon Local Plan Part 1.

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

In relation to outlook, Policy BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) requires new developments to be designed to protect the outlook of adjoining residents. Policy BE24 states that the design of new buildings should protect the privacy of occupiers and their neighbours. In relation to sunlight, Saved Policy BE20 seeks to ensure that buildings are laid out to provide adequate sunlight and preserve the amenity of existing houses.

There are no immediate neighbours within the vicinity of the proposed development. The parking spaces would also be sufficiently remote from surrounding residents so that their amenities would not be adversely affected. As the development would be sited a sufficient distance away from adjoining properties, it is not considered that there would be any loss of amenity to surrounding occupiers, in compliance with relevant Local Plan Policies and standards.

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

Not applicable to this application.

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

Of particular relevance to this application are Policies AM7, AM9, AM14 and AM15 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012). Policy AM7 requires developments not to prejudice the free flow of traffic or conditions of highway/pedestrian safety whilst AM14 set out the Council standards for car parking.

##### Access and Traffic generation

A Parking Management Scheme operates on all the neighbouring streets to the north, west and east of the hospital site and the bulk of the streets to the south of the hospital site. There will be no change in the overall number of car parking spaces provided on the site. The proposed car parking bays conform with the Council's parking standards. It is not considered that the scheme would prejudice the operation of the service yard set alongside the development. The Council's Highway Engineer is satisfied that the scheme would not result in additional congestion on the surrounding road network, or place greater pressure to on-street car parking, or increase the demand to on site hospital car parking.

##### Parking

There is no net loss of parking on the hospital site as a result of the proposals. The Highway Engineer considers that the relocations are suitable and workable and would reduce the likelihood of informal injudicious parking within the Hospital grounds.

##### Cycle Parking

Within the provisions of the emerging Local Plan Part 2 standards, there is a requirement to provide 1 space per 5 staff and 1 space per 10 visitors. This would equate to a requirement for 7 secure cycle storage spaces, which should be located in areas which are secure and accessible. This has not been indicated on the plans but can be secured via planning condition.

##### Travel Plan

The Trust updated its Work Place Travel Plan in 2014 that was submitted in support of the planning application for additional car parking spaces (ref 4058/APP/2014/2373), which was approved on 4th June 2015. A planning obligation is suggested to be imposed with any approval to fully review the Green Travel Plan for the Hospital Trust, based upon the Trust's

updated 2014 Travel Plan, to be secured by a S106 Agreement.

The Highway Engineer does not raise any objections to the layout of the proposed and re-configured car parking layout for the staff and visitor parking. Subject to the above mentioned conditions and obligations, the scheme is considered to comply with Policies AM2, AM7 and AM14 of the Development Plan (2012) and emerging Local Plan Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan (2016).

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

Urban design issues have been dealt with elsewhere in this report.

#### **7.12 Disabled access**

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

Policy 7.2 of the London Plan and Policy D3 'Inclusive design' of the draft London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). The proposed educational facilities will offer a fully inclusive access to all users.

The Design and Access Statement also confirms that the proposals will comply with Part M of the Building Regulations and the requirements of the Council's Supplementary Planning Document: Accessible Hillingdon.

For the Decant and Winter Overspill ward to be successful, access between the proposed building and AMU needs to be seamless'. This is achieved via a link corridor that connects the new build element to the existing floor level. The internal layout of the proposed building is considered to be satisfactory from an accessibility standpoint. Notably, the Council's Access Officer has raised no objection to the proposals.

The Access officer raises no objections to the scheme, which is therefore considered to comply with Policy R16 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), London Plan policies 7.1 and 7.2 and the Council's Supplementary Planning Document 'Accessible Hillingdon'.

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

Not applicable to this application.

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

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

Selected trees on the hospital campus are protected by TPO 411 and TPO 623. No tree survey has been submitted, in spite of the presence of trees. Neither has a landscape assessment been submitted. However, there are no Tree Preservation Orders and no Conservation Area designations affecting trees connected with this proposal.

The applicant submits that the landscape has been designed with the aim of maintaining a natural low-key setting for the frontage to the site and to ensure a calm and quiet

atmosphere for those in the hospital and public who use the pavements immediately outside the building. Hard landscaping will be provided for the fire exit from the existing and proposed buildings. Hard paving materials will be chosen to complement the existing paved areas of Hillingdon Hospital.

The scheme suffers from a shortfall in the provision of a landscaped buffer to the new building and the new building would abut a retained service yard which taken together, is in urban design less than ideal. The Tree and Landscape officer notes that tree loss and the loss of open space will be required to facilitate the proposed built development and replacement parking, which cannot be replaced within the site. Furthermore, the development represents yet another fragment of piecemeal development which is steadily eroding the green infrastructure and environmental quality of the hospital grounds.

Notwithstanding these deficiencies and the scheme's associated lack of landscape buffers, these are not on balance considered sufficient reason to provide a reason of refusal for this scheme that would deliver vital health service improvements to the hospital. However it is considered necessary and appropriate to require the applicant to ameliorate the landscaping deficiencies of the scheme by providing off site tree planting, secured by a S106 Agreement in the nearby Colham Green Recreation Ground, to offset the grassed areas and trees lost by new car parking bay provision. On this basis the scheme is considered to be consistent with Policy BE38 of the Hillingdon Local Plan: Part Two Saved UDP Policies.

Subject to appropriate landscaping conditions/legal agreement to ensure that the detailed proposals preserve and enhance the character and appearance of the area, it is considered that the scheme is on the whole acceptable and in compliance with Saved Policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

#### Ecology

With only grassed areas and young trees being lost, and suitable provision has been made for their replacement, the proposal would not result in any significant material impact on the ecological value of the site.

#### **7.15 Sustainable waste management**

Policy MIN16 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) requires adequate provision of refuse and recycling facilities for new development and for their location to be appropriate in terms of enabling ease of collection from the site.

Refuse arrangements will be dealt with as part of the wider hospital site arrangements. This involves the transfer of any waste to a central collection point, which is already established.

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

NPPF encourages the planning system to support the transition to a low carbon future and so expects new development to comply with development plan policies on local requirements for decentralised energy and to take account of layout, building orientation, massing and landscaping to minimise energy consumption.

London Plan Policy 5.2 sets out the minimum scope for an Energy Assessment and requires that proposals 'make the fullest contribution' to minimising carbon dioxide in accordance with the energy hierarchy: be lean, be clean, be green. For carbon dioxide emissions in non-domestic buildings, it requires a 35% improvement on 2013 building regulations. In addition, Policy 5.3 requires that proposals meet the minimum standards in

the Mayor's supplementary planning guidance, which includes minimising carbon dioxide emissions.

The supporting documentation indicates that proposal's energy and water use will be designed to meet current building regulations and London Plan Standards, with a fabric first approach, adopted to achieve optimum building performance. The proposed building is located in land previously developed. In addition 18 electric vehicle charging points will be provided.

Given the relatively small scale of the works and that the building would be a temporary structure, it is considered that the scheme will not conflict with policies 5.2, 5.13 and 5.15 of the London Plan, Policy PT1.EM1 of Hillingdon Local Plan Part 1 and the NPPF relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions.

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

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (Adopted Nov. 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. Saved Policies OE7 and OE8 of the Local Plan Part 2 seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding. London Plan policies 5.12 and 5.13 require development proposals to use sustainable urban drainage systems (SUDS) unless there are good reasons for not doing so. The site does not lie in a flood risk zone however the hospital does contain a culverted stream and lies next to a Critical Drainage Area. The hospital Site as a whole is identified as having significant surface water issues within the Surface Water Management Plan published by the London Borough of Hillingdon.

A flood risk assessment (FRA), including a Surface Water Drainage Strategy has been submitted in support of the application. The FRA notes that the application site is not located in an area at risk of flooding and is within Flood Zone 1, the lowest risk of flooding. The assessment concludes that the development:

- is in accordance with the National Planning Policy Framework;
- will not be at an unacceptable risk from fluvial flooding;
- will not increase flood risk elsewhere; and
- will employ a surface water drainage strategy based on the principles of sustainable drainage.

The assessment states that the surface water drainage strategy will offer protection against surface water flooding, by providing a positive drainage system, which will intercept overland flows generated within the site. A suitable drainage strategy will be designed once the utility survey have been undertaken for the proposed development site in order to ensure that no flooding takes place up to and including the design rainfall event (1 in 100 year return period), with additional capacity within the system to allow for the potential future effects of climate change. The assessment concludes that the proposed development will not involve an increase in the current impermeable area and therefore, there will be no increase in surface water run-off and no increase in flood risk downstream.

Given that the site is located within Flood Zone 1, flood compensation or resilience measures will not be required to mitigate against the risk of fluvial flooding. .

The Flood and Drainage Officer notes that there is no understanding of how the current private drainage system functions . In addition, there is also shown to be an existing substantial risk of surface water ponding at the location proposed for the temporary

building. These proposals would push this water elsewhere in the site causing flooding to other parts of the hospital. Nevertheless, it is considered that any outstanding issues can be addressed by the imposition of a suitably worded condition, in the event of an approval.

A condition is proposed requiring the provision of site drainage which should be SUDs appropriate. Subject to compliance with this condition, it is considered that the scheme will have satisfactorily addressed drainage and flood related issues, in compliance with the Hillingdon Local Plan: Part 2 Policies OE7 and OE8, Policies DME1 9 and DME1 10 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019), Policies 5.13 and 5.15 of the London Plan and the aspirations of the NPPF.

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

##### **NOISE:**

It is not considered that the proposed development would lead to any significant increase in noise over the hospital site.

##### **AIR QUALITY:**

It is not considered that the proposed development would have an adverse impact on air quality within the locality.

Notably, officers in the Council's Environmental Protection Unit have no concerns in respect of air quality or noise.

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

No response to the public consultation has been received.

#### **7.20 Planning obligations**

Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) is concerned with securing planning obligations to supplement the provision of recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. These saved UDP policies are supported by more specific supplementary planning guidance.

Hillingdon Hospital has expanded over time in a fairly ad hoc manner to no apparent master-plan. Since 2000 there has been a vast array of extensions, temporary buildings, and single structures applied for and approved. There did not appear to be a site wide plan for these resulting in a facility that is now inefficient and complicated. The Council supported the principle of the comprehensive development. Now the comprehensive scheme is mothballed, the Council cannot accept a return to the old approach of ad hoc developments. Accordingly, there must be a long term vision for the hospital that the Council can agree in principle to guide the future development. This will allow the hospital to be altered to reflect a planned approach to ease the complications of the existing facility without creating new problems.

The development within the red line cannot be treated without regard to the blue line of the wider hospital site owned by the Hospital Trust. As stated elsewhere in this report, Planning permission for the AMU building was granted on 14th August 2014 and was accommodated by a S106. The Agreement states that no planning application that involves "additional internal floorspace of greater than 250 sqm being created" shall be submitted prior to "the Council's written approval of an over-arching master plan demonstrating how the Hospital as a whole will be redeveloped in a phased, coherent, sustainable strategic and comprehensive manner (the Strategic Master Plan)". An updated Travel Plan was also required in the S106 which has been provided. These restrictions were primarily done to

avoid the sprawling nature of the applications being received, and to get the Trust to think more strategically about the future development of the site.

The Trust advises that some preliminary work on the Strategic Masterplan has been started. However this work has not been completed at the time of the application, pending the outcome of ongoing discussions regarding the potential to move Hillingdon Hospital to a different location. At the present time one of the options being considered is for a phased redevelopment of the existing site, with a new hospital located to the west of the site, enabling the existing hospital to continue to operate to the east. In the meantime the Trust still has to address pressing clinical requirements.

The Trust is not seeking to avoid the requirement to prepare the Strategic Master Plan but are not able to provide it at the present time, due to a range of operational constraints including:

- Prioritising the backlog maintenance to address issues raised by the care quality commission (CQC).
- Strategic discussions relating to the role of Hillingdon Hospital within the west London healthcare plan
- Discussions around whether a new hospital should or could be provided at Brunel University site.
- The role of Mount Vernon Hospital
- Discussions regarding provision of a brand new hospital or upgrading the existing fabric.

The Trust explains that its primary concern is to maintain the operation of the hospital site on a day to day basis. Year on year, despite programs in the community to prevent admission, and to maintain patients with long term conditions at home, demand for the Trust services has grown. Emergency activity has increased significantly, which put huge pressure on hospital facilities e.g. outpatient clinic rooms and inpatient beds. Funding has usually been prioritised for front line operational services and therefore capital investment has been low over a number of years. However due to the age of the building stock, capital funds are being consumed by upgrading major mechanical and electrical services infrastructure as a priority.

The Trust is under pressure to have the overspill and decant ward available for use in early 2020 and have requested a planning condition or legal of Agreement be entered into, so that the requirements of the S106 agreement do not apply to the proposed ward. The nature of the building is that it is a pre fabricated structure and it is not intended to be a permanent feature of the site. So placing it in this location does not prejudice the outcome of a future masterplan. If future large scale buildings ie larger than 250 sq meters, are proposed on the site then the Trust accepts that the obligations of the S106 Agreement will still apply.

In light of the above, if Members are minded to support the scheme, a deed of variation to the 2013 legal agreement (the Principal Agreement) is recommended, which would allow the current scheme to proceed in this instance, but would preserve the restrictions set out in the 2013 Agreement in all other respects. The Deed of Variation will vary the Principal Agreement by reference to the specific area shown on a plan, and in all other respects the Principal Agreement will remain unchanged.

It is considered necessary and appropriate to require the applicant to ameliorate the landscaping deficiencies of the scheme by providing off site tree planting, secured by a S106 Agreement in the nearby Colham Green Recreational Ground, to offset the grassed



areas and trees lost by the proposals.

A planning obligation is suggested to be imposed with any approval to review the Green Travel Plan for the Hospital site, based upon the Trust's updated 2014 Travel Plan, to be secured by a S106 Agreement.

The applicant agreed to these obligations. Overall, it is considered that the level of planning benefits sought is adequate and commensurate with the scale and nature of the proposed development, in compliance with Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

CIL

The Mayor and the Council is not currently proposing to charge CIL on buildings that are to be used for educational or health purposes.

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

Not applicable to this application.

#### **7.22 Other Issues**

There are no other issues associated with this application.

### **8. Observations of the Borough Solicitor**

General

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

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

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

Planning Conditions

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

Planning Obligations

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

## Equalities and Human Rights

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

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

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

### **9. Observations of the Director of Finance**

Not applicable to this application.

### **10. CONCLUSION**

This decant ward will help to improve the quality of patient care that the Trust is able to provide to the residents of the London Borough of Hillingdon and beyond. It is considered that the proposal represents an opportunity to provide modern and improved health care facilities within an established health care setting, in compliance with Local, London Plan and National policy.

The scheme would deliver a significant improvement in acute medical health services for Borough and in a manner that is consistent with inclusive design in terms of building accessibility. The scheme would not have an adverse impact upon neighbouring residential properties from an amenity perspective or impact adversely on surrounding streets in terms of traffic congestion or pressure upon on-site car parking.

The Trust advises that some preliminary work on the Strategic Masterplan has been started. However this work has not been completed at the time of the application, pending the outcome of ongoing discussions regarding the potential to move Hillingdon Hospital to a different location. In the meantime the Trust still has to address pressing clinical requirements and has requested a planning condition or legal of Agreement be entered into, so that the requirements of a S106 agreement for a strategic master plan do not apply to the proposed ward.

This proposal will result in the loss (in regard to the hospital) of increasingly rare pieces of green amenity space. Nevertheless, this loss would be mitigated by additional on site and off site planting which has been conditioned, or is subject to a legal agreement.

Officers consider that the benefits, on grounds of clinical and locational need, when

weighed against the drawbacks of the proposed development are significant and therefore, this would outweigh the ad hoc development of the hospital site and loss of soft landscaping arising from the proposed development.

Subject to compliance with condition, and a S106 Agreement, it is considered that the scheme can satisfactorily address highway, access, drainage and flood related issues.

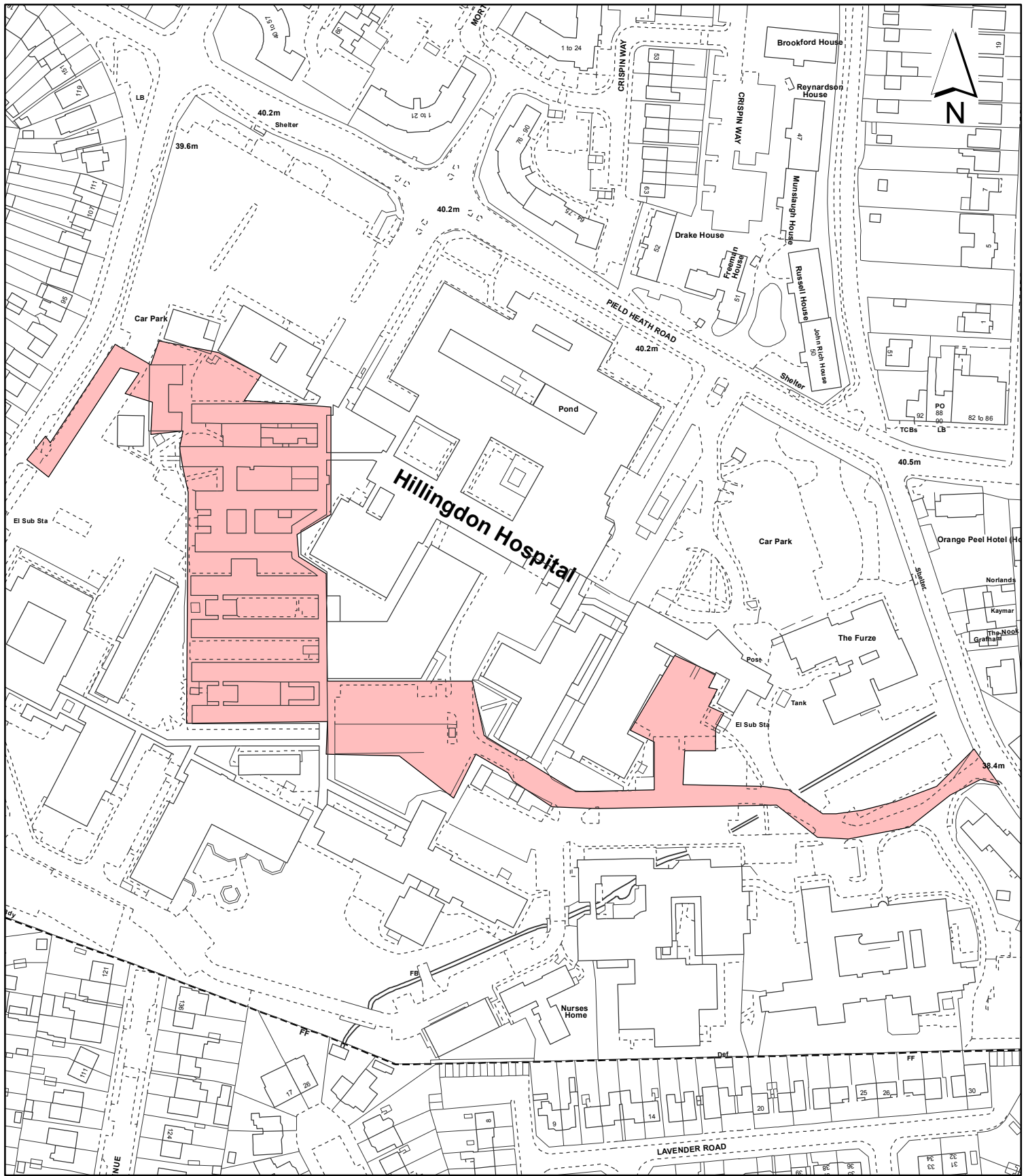
Accordingly, approval is recommended.

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

The Hillingdon Local Plan: Part 1- Strategic Policies (8th November 21012)  
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)  
The Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019),  
London Plan 2016  
National Planning Policy Framework (NPPF)  
Council's Supplementary Planning Guidance - Community Safety by Design  
Council's Supplementary Planning Document - Air Quality  
Hillingdon Supplementary Planning Document: Accessible Hillingdon January 2010)

**Contact Officer:** Karl Dafe

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**Notes:**

 Site boundary

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Site Address:

**Hillingdon Hospital  
 Field Heath Road**

Planning Application Ref:  
**4058/APP/2019/3286**

Planning Committee:  
**Central & South**

Scale:  
**1:2,000**

Date:  
**January 2020**

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 OF HILLINGDON**  
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