

Report of the Head of Planning, Transportation and Regeneration

Address FORMER MASTER BREWER SITE FREEZELAND WAY HILLINGDON

Development: Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.

LBH Ref Nos: 4266/APP/2019/3088

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Design and Access Statement
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Date Plans Received:	23/09/2019	Date(s) of Amendment(s):	27/01/2020
Date Application Valid:	10/10/2019		18/11/2019
			31/10/2019
			16/12/2019
			23/09/2019
			23/12/2019
			11/10/2019
			09/12/2019
			09/10/2019

1. SUMMARY

Detailed planning permission is sought for redevelopment of the former Master Brewer site, for a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 residential units; flexible commercial units (Use Class

B1/A1/A3/D1); 165 car parking spaces and landscaping.

1943 local residents and businesses were consulted. 268 representations have been received including two in support and 266 objections.

The Residents Association and Oak Farm Residents Association have also made representations, objecting to the proposed development.

The application is referable to the Mayor as it falls into the following categories of the Schedule to the Order 2008:

- Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats;
- Development which comprises or includes the erection of a building or buildings outside Central London with a total floorspace of more than 15,000 square metres; and
- Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London

Whilst no objection is raised to the principle of redevelopment of the site with a residential led mixed use scheme, it is considered that the size and scale of the proposed development is not in keeping with the local character and context. The resultant development would be excessive in height, massing and density which would be detrimental to the visual appearance of the wider area and would have a negative visual impact in both short and long distant views. In addition, the height and bulk of the proposed development will appear excessively prominent, to the detriment of the open character of the adjoining Green Belt whilst also having a negative impact on the surrounding streetscape.

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

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

Whilst the proposed development would generally provide acceptable living conditions in terms of space standards for all of the proposed units and protect the residential amenity of surrounding occupiers, objections still remain regarding daylight and sunlight levels for the proposed occupants, noise levels within the development and air quality. Furthermore, insufficient private amenity space has been provided.

Based on the information submitted to date, there are a number of issues which are also considered unsatisfactory. However it is considered that subject to appropriately worded conditions (or legal agreement) these issues could be resolved. These issues include; Accessibility within the site; Flood Risk and Surface Water Drainage; Landscaping; and Ecology.

There are a number of items which need to be secured by way of a legal agreement which are listed in detail within the Planning Obligations section of this report. Although agreement to some of the obligations has been indicated by the Applicant neither a S106 Agreement or Unilateral Undertaking has been signed. The development therefore fails to satisfactorily address some issues relating to contributions towards the improvements required as a consequence of the proposed development. This is in respect of off-site highways works, public transport, travel plans, employment and training, parking permits

and car club, landscape screening and ecological mitigation, affordable housing, surface water drainage, off-site carbon contribution and project management and monitoring.

For the reasons set out above, the application is being recommended for refusal.

2. RECOMMENDATION

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

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

1 NON2 Non Standard reason for refusal Design

The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt, the wider open context and would mar the skyline, contrary to Policies BE1 and EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMHB 10, DMHB 11, DMHB 12, DMHB 14, DMHB 17, DMEI 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part Two - Site Allocations and Designations (2020), Policies 7.4, 7.6, 7.7 of the London Plan (2016), Policies D1, D3, D4, D8 and D9 of the London Plan (Intend to Publish version 2019) and the NPPF (2019).

2 NON2 Non Standard reason for refusal Parking

The proposed on site residential and commercial car parking provision is insufficient to address the demands of the proposed development and its future occupiers. Due to the sites low public transport accessibility, the proposed development would lead to future resident and visitor vehicles being displaced onto the surrounding local and strategic road network. This displacement of vehicles would lead to further congestion on the local and strategic highway network resulting in severe harm to the highway network and highway and pedestrian safety. The proposals are contrary to Policy T1 and E5 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policies 6.3, 6.11 and 6.12 of the London Plan (July 2016), Policies T4, T6 and T6.1 of the draft London Plan (Intend to publish version 2019) and the NPPF (2019).

3 NON2 Non Standard reason for refusal Traffic

The application fails to demonstrate that the proposal would not result in an unacceptable rise in traffic around the application site causing severe impacts to the free flow of traffic as well as to highway and pedestrian safety. The proposals are contrary to Policy T1 and E5 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policies 6.3, 6.11 and 6.12 of the London Plan (July 2016), Policies T4, T6 and T6.1 of the draft London Plan (Intend to publish version 2019) and the NPPF (2019).

4 NON2 Non Standard reason for refusal Noise

The submitted noise report has failed to demonstrate that the proposed residential units can be sited, designed, insulated or otherwise protected from external noise sources and

in particular the A40 and Long lane to appropriate national and local standards. The proposal is therefore contrary to Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) Chapters 12 and 15 of the NPPF (2019), Policy DMHB 11 of the Local Plan Part 2- Development Management Policies (2020), Policy 7.15 of the London Plan (2016) and Policy D14 of the London Plan (Intend to Publish version 2019).

5 NON2 Non Standard reason for Air Quality

The submitted Air Quality Assessments have failed to provide sufficient information regarding Air Quality, moreover the information submitted is not deemed to demonstrate the proposals are air quality neutral and given that the site is within an Air Quality Focus Area, the development could add to current exceedances in this focus area. The development is contrary to Policy DMEI 14 (Air quality) of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM8 of the Local Plan Part 1 (2012), Policy 7.14 (Improving Air Quality) of the London Plan (2016), Policy SI 1 of the draft London Plan - Intend to Publish (December 2019) and the NPPF (February 2019).

6 NON2 Non Standard reason for Daylight and Sunlight

The submitted Sunlight and Daylight Assessment has failed to adequately assess the expected Daylight and Sunlight levels within the development in accordance with BRE guidance. The proposed development has therefore failed to demonstrate that the proposed residential units would achieve adequate Daylight and Sunlight levels to the detriment of residential amenity of future occupiers contrary to policies DMHB 10 and DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy BE1 of the Local Plan Part 1 (2012), The GLA 'Housing' SPG (March 2016), Policy D6 of the London Plan (Intend to Publish version 2019) and the NPPF 2019.

7 NON2 Non Standard reason for refusal Private Amenity Space

The proposed development fails to provide on site private and communal amenity of a quantity and quality commensurate to the size and layout of the proposals. The shortfalls of private amenity space are detrimental to the residential amenity of the future occupiers the proposal would provide a substandard form of accommodation for future residents contrary to Policies DMHB 11 and DMHB 18 of the Local Plan Part 2- Development Management Policies (2020), Policy BE1 of the Local Plan Part 1 (2012), Policy 7.1 of the London Plan (2016), Policies G1 and D6 of the Draft London Plan (Intend to Publish version 20129) and Para 127 of the NPPF (2019).

8 NON2 Non Standard reason for refusal Planning Obligations

The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Affordable housing, construction training, landscape and ecological announcements, carbon offset contributions, surface water drainage, parking permit exclusion, car clubs and Project Management and Monitoring). The scheme therefore conflicts with Policies Policy R17 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), DMCI 7 of the Hillingdon Local Plan Part 2 Development management Policies (2020), the London Borough of Hillingdon Supplementary Planning Document on Planning Obligations, Policy SA 14 'Master Brewer and Hillingdon Circus' of the Local Plan: Part Two Site Allocations and Designations (2020), Policy DF1 of the Draft London Plan (Intend to Publish Version 2019), Policy 8.2 of the London Plan (2016) and the NPPF 2019.

INFORMATIVES

1 I52 Compulsory Informative (1)

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

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Hillingdon Local Plan: Part 2 - Development Management Policies (2020); Hillingdon Local Plan: Part Two - Site Allocations and Designations (2020), The London Plan (2016) and Supplementary Planning Guidance, and all relevant material considerations, including the NPPF.

NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
DMEI 14	Air Quality
DMEI 7	Biodiversity Protection and Enhancement
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
DMAV 1	Safe Operation of Airports
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DME 1	Employment Uses in Designated Sites
DME 3	Office Development
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 9	Management of Flood Risk
DMH 7	
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 13	Shopfronts
DMHB 13A	Advertisements and Shop Signage
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places

DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 3.10	(2016) Definition of affordable housing
LPP 5.16	(2016) Waste net self-sufficiency
LPP 7.16	(2016) Green Belt
LPP 7.2	(2016) An inclusive environment
DMH 2	Housing Mix
DMHB 1	Heritage Assets
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMTC 3	Maintaining the Viability of Local Centres and Local Parades
LPP 7.8	(2016) Heritage assets and archaeology
SA 14	Master Brewer and Hillingdon Circus, Hillingdon
LPP 2.15	(2016) Town Centres
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.11	(2016) Affordable housing targets
LPP 3.12	(2016) Negotiating affordable housing on individual private residential and mixed-use schemes
LPP 3.13	(2016) Affordable housing thresholds
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.6	(2016) Children and young people's play and informal recreation facilities
LPP 3.7	(2016) Large residential developments
LPP 3.8	(2016) Housing Choice
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.12	(2016) Improving opportunities for all
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.7	(2016) Renewable energy
LPP 6.10	(2016) Walking
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.13	(2016) Parking
LPP 6.2	(2016) Providing public transport capacity and safeguarding land for transport
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.4	(2016) Enhancing London's Transport Connectivity
LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality

LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy

3

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

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The Local Planning Authority has taken into consideration the requirements of the National Planning Policy Framework and has worked pro-actively with the applicant through extensive negotiations to address material planning issues wherever possible. We have made available detailed advice in the form of our statutory policies from the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Hillingdon Local Plan: Part 2 - Development Management Policies (2020); Hillingdon Local Plan: Part Two - Site Allocations and Designations (2020), The London Plan (2016) and Supplementary Planning Guidance, and all relevant material considerations, including the NPPF and other informal written guidance, as well as offering a full pre-application advice service. Notwithstanding these discussions, the scheme was ultimately considered to fail to comply with the development plan for the reasons identified above.

5 174 **Community Infrastructure Levy (CIL) (Refusing Consent)**

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012.

For more information on CIL matters please visit the planning portal page at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

3. **CONSIDERATIONS**

3.1 **Site and Locality**

The application site measures approximately 2.48 Ha and is located at the junction of Long Lane and Freezeland Way within the North Hillingdon Local Centre. The site was formerly occupied by the Master Brewer Motel, a public house/motel with 106 bedrooms, conferencing and restaurant facilities and 200 parking spaces. Following demolition of the Motel and associated buildings, the site is currently a cleared site.

The site has been recently been unlawfully used as Royal Mail depot between November 2019 and January 2020. The occupiers have been in dialogue with the Councils Enforcement team and the use as a Royal Mail depot has now ceased.

The site comprises mostly hard standing with semi-mature and mature trees and vegetation around the boundary. Vehicular access to the site is provided via an entrance/exit point onto Freezeland Way.

The site is broadly flat but inclines at its boundary adjacent to Long Lane with an approximate change in levels of 2.5m and declines towards the north at the junction with the M40 with an approximate change in levels of 3m.

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

There is a strip of land between the site and Long Lane and also a parcel of land to the south which fall outside of the red line plan and which is currently owned by a third party (thought to be TfL).

To the southeast of the site is a parcel of Council owned land fronting Freezeland Way which is not included within the planning application site area. On the southern side of Freezeland Way are predominately two storey residential properties.

The site falls within the North Hillingdon Local Centre and the land to the east and north of the site falls within the Green Belt. There is a parcel of land which lies directly adjacent to the red line plan to the east which has been purchased by the Applicant. No works are proposed here as part of this application.

The site is approximately 200 metres east of Hillingdon London Underground Station. The station is adjacent to TfL bus routes and coach stops which provide services to Uxbridge, Oxford and Ickenham. The site has a Public Transport Accessibility Level (PTAL) of 2 and 3 where 6 is high.

Hillingdon Circus is characterised by two/three storey buildings with commercial uses on the ground floor and residential uses above. Further to the south along Long Lane and also to the north towards Ickenham there are mostly two storey semi-detached and detached houses. Hercies Road to the west has one four storey building and is then predominately two storey houses and bungalows. Aerial Drive to the south of Hercies Road is characterised by three storey flats, parking and garages.

To the east of the site is Freezeland covert which is a triangular piece of land bound to the north by the M40 and south by the exit Road from the M40. This is open land and is designated Green Belt. The Green Belt extends westwards on the other side of Long Lane/Hercies Road. To the north and northeast is also designated Green Belt and the Hillingdon Trail. Northolt Airport is locate further to the north east.

3.2 Proposed Scheme

A full planning application has been submitted for the construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514

units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.

Commercial

Flexible commercial space is proposed at ground floor level in the south west corner of the site where a small square is proposed. The commercial accommodation would include approximately 1,200 sqm of B1/A1/A3/D1 uses.

Residential

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

All of the residential units would be built to (Building Regulations) Wheelchair Adaptable standards and 10% of the units would be built to Wheelchair User standards.

Housing Mix (514 new homes)

221 (43%) 1 Bedroom Units
216 (42%) 2 Bedroom Units
77 (15%) 3 Bedroom Units

The proposed buildings vary in height up to 11 storeys. The tallest building is located in the north western corner of the site adjacent to Long Lane and the A40. One solid building measuring approx. 150 m would run along the northern boundary and would accommodate car parking at ground level with residential accommodation above interspersed by podium level amenity space at the first floor. This block would have the appearance of five separate residential blocks (Buildings 5, 6, 7, 8 & 9) separated by single storey units and would incorporate five main entrances to the residential dwellings above. Seven residential units are proposed at ground floor level, four of which are single aspect.

There are a further two blocks located along the western boundary adjacent to Long Lane. One (Building 1) is located to the south western corner of the site where a small square is proposed and the other (Buildings 2, 3 & 4) would have the appearance of three blocks separated by two storey houses with pitch roofs. This block would accommodate car parking at ground floor level with amenity space is provided at first floor podium level. Four north facing single aspect residential units are also proposed at ground floor level.

A further three blocks would be located on the eastern part of the site. No podium is proposed here and residential accommodation is located at ground floor level.

The buildings proposed along the northern and western boundary, are positioned to provide a perimeter block arrangement. The Applicant explains that these perimeter buildings are proposed as continuous built volumes, to protect the site from road noise and air pollution from Long Lane and the A40.

Building 1 would be eight storeys and is located at the south western corner of the site. It would have 368 sqm of flexible commercial space on the ground floor (B1/A1/A3/D1) and

would have 61 dwellings in the upper storeys. Also on the ground floor is cycle storage and commercial bin storage. The commercial units on the ground floor front Long Lane, Freezeland Way and the new central square. The proposed materials for building 1 are brick with accented metal framing and reconstituted stone.

Buildings 2, 3 & 4 are housed in one single block on the western portion of the site and would have two commercial units (B1/A1/A3/D1) on the ground and first floor of approx. 275 sqm and 488 sqm respectively. Building 2 would be eight storeys and would accommodate 37 dwellings, building 3 would be eight storeys and would accommodate 35 dwellings and building 4 would be up to seven storeys and would accommodate 46 dwellings some of which would be duplex. The proposed materials for buildings 2, 3, & 4 is brick with accented reconstituted stone and metal framing.

Buildings 5, 6, 7, 8 & 9 are housed in one single block on the northern part of the site. Building 5 is 11 storeys and would accommodate 64 dwellings. The proposed materials for building 5 and the attached four storey duplex housing would be buff brick with reconstituted stone and metal cladding and framing. Buildings 6, 7, & 8 are each up to eight storeys with the upper two floors stepped in at the south by approx. 7m. Buildings 6 and 7 each accommodate 45 dwellings whilst Building 8 accommodates 46 dwellings. The duplex housing would be buff brick with metal framed windows. The three blocks would be brick with the upper two storeys clad in metal. Building 9 would be three storeys and would accommodate 15 dwellings.

Building 10 would be seven storeys and would accommodate 50 units. The material would comprise red brick with upper storey being clad in metal.

Buildings 11 and 12 would be five storeys and would provide 70 units.

In summary (Total 514 units):

Building 1 - 61 units
Building 2 - 37 units
Building 3 - 35 units
Building 4 - 46 units
Building 5 - 64 units
Building 6 - 45 units
Building 7 - 45 units
Building 8 - 46 units
Building 9 - 15 units
Building 10 - 50 units
Building 11 - 35 units
Building 12 - 35 units

Amenity Space

Private amenity space is provided throughout the development in the form of private balconies and terraces and private podium level gardens. In addition, the proposals include public open space which is accessible to everyone, not just the future residents of this development.

Parking

A total of 165 car parking spaces are proposed at ground floor level within the podium or at surface street level. 16 of the spaces would be Blue Badge/ Wheelchair accessible

spaces. Four car club spaces are proposed with an offer of three years free membership to be provided for each dwelling upon first occupation. 20% of the parking spaces (34 spaces) would include active electric vehicle charging points and the remaining spaces (131 spaces) would have passive electrical charging capability. Space to store approximately 918 bicycles has also been provided.

The proposal would also include an electricity sub station which would be located close to the western boundary fronting Long Lane.

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

Design and Access Statement and Masterplanning Principles (JTP)
Detailed Application Drawings (Collado Collins)
Transport Assessment (WSP)
Travel Plan (WSP)
Statement of Community Engagement (Terrapin)
Air Quality Assessment (Create Consulting)
Acoustic Assessment (Spectrum)
Flood Risk Assessment and Surface Water Strategy (ICIS Design Limited)
Land Contamination Assessment (Delta Simons)
Tree Survey and Arboricultural Implications (Bradley Murphy Design)
Energy and Sustainability Statement (Cudd Bentley)
Daylight/Sunlight Assessment (Robinson Consulting)
Landscaping Masterplan and Drawings (Bradley Murphy Design)
Ecology Phase 1 Habitat Report (Bradley Murphy Design)
Townscape Visual Impact Assessment (Bradley Murphy Design)
Bird Strike Mitigation (Bradley Murphy Design)
M+E Concept Design (Cudd Bentley)
Ventilation Statement (Cudd Bentley)
Archaeology Statement (AOC)
Topographical Survey
Fire Strategy

3.3 Relevant Planning History

Comment on Relevant Planning History

Most recently application ref. 4266/APP/2017/3183 for 'construction of a residential-led, mixed use development comprising buildings between 4 and 9 storeys to provide 437 residential units (Use Class C3); employment floor space (Use Classes B1(a-c)); flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking; and hard and soft landscaping, plant and other associated ancillary development.' was refused on 21/03/19 for a total of ten reasons which are summarised as follows;

- Height, density, site coverage and lack of landscaping and screening
- Insufficient on-site car parking
- Unacceptable increase in traffic in the locality
- Inaccessible to wheelchair users, particularly the community amenity space areas
- Inadequate SuDS
- Climate change and carbon emissions
- Loss of high value trees
- Unacceptable impact of noise on the proposed residential dwellings
- Inadequate refuse and recycling facilities
- Insufficient planning contributions

Previous to this Hillingdon Council resolved to grant full and outline consents on 27 August

2014 (Full application ref.4266/APP/2014/518) for 'retail-led, mixed-use redevelopment of the site, comprising a 3,543 sq.m. (GIA)/2,182 sq.m.(net) foodstore, with 179 car and 32 cycle parking spaces (class A1); three additional retail units totalling 1,037sq.m. (Use Classes A1 to A5); a 100 sq.m. 'Safer Neighbourhoods' unit; a 70-bedroom hotel comprising six storeys plus plant level, 18 car parking and 16 cycle spaces; with associated highway alterations and landscaping' and (Outline application ref:4266/APP/2014/519) for '125 residential units, with 100 car parking spaces, 138 cycle parking spaces, associated highway alterations and landscape improvements'. However the Section 106 agreement was never completed by the applicant in connection with these applications and so planning permission was never granted.

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

Outline planning application (ref: 4266/APP/2012/1545) for 'Erection of 5 part 4, part 5 storey blocks to provide 125 residential units (Use Class C3) with 99 car parking spaces and 150 cycle parking spaces and associated highways alterations, together with associated landscaping' was refused on 10/12/13 for the following reasons:

1. Highways
2. Development in Isolation
3. Planning Obligations
4. Traffic/Highways
5. Air Quality
6. Cumulative impact

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

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

Outline application (ref. 4266/APP/2004/2715) for the redevelopment of the site to provide a comprehensive mixed use scheme comprising class A1 food store (8,819m²), 4 retail units (805m²) and retail parking for 538 vehicles, plus 220 residential units including affordable housing and parking for 230 vehicles, highway alterations to Long Lane and Freezeland Way including new access to the site off Freezeland Way (involving demolition of the Master Brewer Motel) was refused on 23/12/04.

Application (ref. 4266/APP/2005/2978 & 4266/APP/2005/2979) were submitted for the erection of a Spenhill superstore (7,673 m²), 1,244m² of additional space for A1, A2, A3, A4 or D1 uses within the Use Classes Order, Car parking for 409 cars, 205 residential apartments, including affordable housing, together With 205 car parking spaces, highway alterations and landscaping and the demolition of the Master Brewer Hotel. Application

4266/APP/2005/2978 was refused on 14/06/06 and application 4266/APP/2005/2979 was the subject of an appeal but was subsequently withdrawn in January 2007.

4. Planning Policies and Standards

London Borough of Hillingdon Development Plan (from 17 January 2020)

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 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

West London Waste Plan (2015)

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 (Intend to Publish Version, December 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 has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the

Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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.EM6	(2012) Flood Risk Management
PT1.H2	(2012) Affordable Housing
PT1.HE1	(2012) Heritage
PT1.CI1	(2012) Community Infrastructure Provision
PT1.E5	(2012) Town and Local Centres
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.T1	(2012) Accessible Local Destinations

Part 2 Policies:

NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
DMEI 14	Air Quality
DMEI 7	Biodiversity Protection and Enhancement

LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
DMAV 1	Safe Operation of Airports
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DME 1	Employment Uses in Designated Sites
DME 3	Office Development
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 9	Management of Flood Risk
DMH 7	
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 13	Shopfronts
DMHB 13A	Advertisements and Shop Signage
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 3.10	(2016) Definition of affordable housing
LPP 5.16	(2016) Waste net self-sufficiency
LPP 7.16	(2016) Green Belt
LPP 7.2	(2016) An inclusive environment
DMH 2	Housing Mix
DMHB 1	Heritage Assets
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMTC 3	Maintaining the Viability of Local Centres and Local Parades
LPP 7.8	(2016) Heritage assets and archaeology
SA 14	Master Brewer and Hillingdon Circus, Hillingdon

- LPP 2.15 (2016) Town Centres
- LPP 3.1 (2016) Ensuring equal life chances for all
- LPP 3.11 (2016) Affordable housing targets
- LPP 3.12 (2016) Negotiating affordable housing on individual private residential and mixed-use schemes
- LPP 3.13 (2016) Affordable housing thresholds
- LPP 3.3 (2016) Increasing housing supply
- LPP 3.4 (2015) Optimising housing potential
- LPP 3.5 (2016) Quality and design of housing developments
- LPP 3.6 (2016) Children and young people's play and informal recreation facilities
- LPP 3.7 (2016) Large residential developments
- LPP 3.8 (2016) Housing Choice
- LPP 3.9 (2016) Mixed and Balanced Communities
- LPP 4.12 (2016) Improving opportunities for all
- LPP 5.1 (2016) Climate Change Mitigation
- LPP 5.10 (2016) Urban Greening
- LPP 5.11 (2016) Green roofs and development site environs
- LPP 5.12 (2016) Flood risk management
- LPP 5.13 (2016) Sustainable drainage
- LPP 5.14 (2016) Water quality and wastewater infrastructure
- LPP 5.15 (2016) Water use and supplies
- LPP 5.2 (2016) Minimising Carbon Dioxide Emissions
- LPP 5.7 (2016) Renewable energy
- LPP 6.10 (2016) Walking
- LPP 6.11 (2016) Smoothing Traffic Flow and Tackling Congestion
- LPP 6.13 (2016) Parking
- LPP 6.2 (2016) Providing public transport capacity and safeguarding land for transport
- LPP 6.3 (2016) Assessing effects of development on transport capacity
- LPP 6.4 (2016) Enhancing London's Transport Connectivity
- LPP 6.9 (2016) Cycling
- LPP 7.14 (2016) Improving air quality
- LPP 7.3 (2016) Designing out crime
- LPP 7.4 (2016) Local character
- LPP 7.5 (2016) Public realm
- LPP 7.7 (2016) Location and design of tall and large buildings
- LPP 8.2 (2016) Planning obligations
- LPP 8.3 (2016) Community infrastructure levy

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **5th November 2019**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015 as a Major Development. 1943 surrounding property owners/occupiers have been consulted. At the time of writing the report, two letters of support had been received, the contents of which are summarised below.

I would love to see new buildings in the area

Need for housing, particularly social housing and mixed developments on vacant sites

In addition, 266 single representations of objection were received as summarised below:

DESIGN COMMENTS:

Excessive in its size and scale

Excessive in height. The heights of the main blocks are four times the height of local housing, and the main tower at 11 storeys will be six storeys above the roof height of the station and the Swallow pub opposite the site on Long Lane

Excessive density

Excessive in bulk

Eleven storeys is excessive for the local context and out of character

Over development

Unsympathetic to the area

Not in keeping with the design and character of the existing area

Adverse effect on the visual amenity of the area as a whole

Too imposing

Too little consideration for green spaces and environmental quality of life for the new residents and for the many existing residents in the neighbourhood

11 storeys would cause visual deterioration to the area

Incongruous blot on the landscape

Ickenham has always been regarded as a village and this development would destroy this ethic

11 storeys high would dominate the landscape and will look awful

The highest building in the area is currently no more than 3 storeys

Would provide poor living accommodation

May lead to privacy issues as 11-storey occupants can see into private dwellings/gardens

Cumulative impact of the site opposite next to Hillingdon Station

Not appropriate in this location

Overshadowing

Will result in overcrowding

High rise not suitable for families with children

Inadequate outside space for the potential number of residents

Monstrosity of the size would destroy the area

High rise eyesore and a blot on the landscape

The site is simply not big enough to support the level of development and number of units

The scale and nature of the development is more fitting to an urban environment and does not respect the nature and character of the local area

Impact on nearby Greenbelt and conservation areas

This initial approach into Hillingdon borough is green for a reason, and marks the start of semi-countryside. It would be entirely wrong and completely change landscape and character.
The people living in the proposed flats would be extremely overcrowded, lacking space and putting their health at risk living on the very busy A40 road
Having sky scrapers would look out of character for Hillingdon
Would make Hillingdon circus look ugly
This is not an inner city residential area, this is a suburb on the fringe of the greenbelt which needs protecting and any new development should and must reflect the existing area
If housing should be mix of houses and flats
Will adversely affect existing residents quality of life
Would make the whole area feel built up
The borough needs more family homes with gardens and adequate parking
Out of place and an aesthetic disaster
The look, design and scale fail to harmonise with the local street scene
The eleven storey building would be an ugly intrusion and totally incongruous with the surrounding landscape
Over bearing
Oversized
This will ruin our suburbs
This will change the character of developments in the area and will set a precedent for massing in this area.

TRANSPORT HIGHWAYS AND PARKING:

Excessive car parking on site
Impact of development along with construction of HS2 (impact of closure of Breakspear Road on wider surrounding network)
Negative impact on the surrounding highway network with regards to traffic
Pedestrian safety due to the existing traffic levels at Hillingdon Circus
Hillingdon Circus junction would not cope with more cars
Site construction traffic (particularly with existing HS2 issues)
Significant existing issues with traffic, particularly at rush hour
Lack of car parking and impact on the area in terms of on street parking
Insufficient vehicular access
Hillingdon station struggles to keep up with ever increasing numbers of commuters
Access and egress of vehicles from the proposed site will increase congestion at the junction
The station car parking too expensive people already parking cars around the Oak farm estate
There's only one bus that takes you to Uxbridge and at peak times it's difficult to get on one
Would impair highway safety
Ickenham should maintain its village character and not be a car park
Public transport in that area is poor
Standing traffic already causes a lot of pollution, and this will only be exacerbated
Would exacerbate pollution levels which are dangerous to humans and wildlife
The right of way in and out of this site looks like an accident waiting to happen
Access is going to cause severe traffic problems
It is unrealistic to think people will do their shopping by bicycle, on foot, by bus or tube
Insufficient 'visitors' car parking for 514 residences
The Police, Fire and Ambulance services cannot get through the traffic as it is
Four spaces for a car club is too little
It already takes many minutes to navigate the adjacent pedestrian network of crossings

PRINCIPLE:

Additional strain on public services, school places, GPs, dentist, police and hospitals, U2 bus service, water resources and underground water pipe network

Too much building of estates and turning one house into 4/5 in the area
The development would be harmful to the local area and the local community
This development is only for profit and not on what this area needs
This scheme would destroy the neighbourhoods that we live and work in and actually care about
The Diary which is in progress of being built that is going to add to existing traffic
Impact on emergency services
The influx of people will overwhelm the whole community
Impact on elderly people
Would ruin the local area
High rise flats are not suitable for families with children
Would represent overcrowding for future residents

POLLUTION

Would increase air pollution in the locality created by cars
Disruption during construction with regards to noise and dust
More residential accommodation and commercial units will increase air pollution and congestion
Noise caused by unloading and loading of delivery to commercial units would disturb local residents and homeowners
The negative impact on health from being so close to the A40
Atmospheric pollution from flights
This site is unfit for human habitation due to air quality
Poor quality of external amenity space given noise and air pollution of the site
Noise from RAF Northolt

OTHER:

Unsustainable
Would increase risk of terrorist attack given proximity to flight path and RAF Northolt
The Developers identify Court Park and Hillingdon Farms open area as places for recreation and these should be signed, lit up and paved. The alleyway from Hercies Road to Sweetcroft Lane/Court Park needs improvement
Negative impact on the local community
De-value Ickenham property prices
Detrimental to the quality of life of the surrounding area
Serious crime in the area is on the increase and this 'estate' would take advantage of the proximity to county lines
Impact on Hillingdon Hospital and the local A & E
Impact on sustainability of local high street shops which again will ruin the village ethos
The sewer system is unable to cope with the current demand and this development will only compound the situation.
A housing estate of this size will bring down the area
Detrimental effect on the existing residential amenities
Lack of nurseries and children's centres in the local vicinity
Classroom numbers will increase and our choices will be unfairly limited
People will buy them as buy to let's which won't create a Community
This development will put further strain on the Flooding of Yeading brook during rain fall and increase risk of property damage from flooding
Local schools have already expanded and most of them now lacking in any meaningful outdoor facilities
Lack of consultation with the GPS currently operating at the Hillingdon Health Centre (opposite the site). A potential increase of 1000 new residents and patients will cause great disruption to the Practice. The surgery building will not be able to cope and there is a shortage of doctors and nurses currently.

Wildlife habitats will be destroyed

The roads are flooding in bad rain as green areas are being built on

Ecology and biodiversity

Global climate disruption

Leave it as a green area for walks and children to play

The commercial units will have an impact on the local shops, could be left empty and end up being vandalised

It will create a darkness in the neighbourhood

The former Master Brewer site would be better served by a community hall or hub so that young and older members of the community can use it.

A tree planting venture would be ideal

This development could end up as a slum of the future

This is suburban outer London, not crowded inner London

The high density, due to overcrowding could lead to increased levels of violence and civil unrest

There is already problems in the area because there is nowhere for teenagers to go and be safe

The properties would have no private gardens space, leading to issues with communal areas and anti social behaviour

There is no police presence so the "communal" green space would not be policed

At present Green Belt views are visible and uninterrupted in most directions

Impact on Ickenham Manor, a grade 1 listed building set in the Green Belt and conservation area whose land includes a scheduled ancient monument and is a designated site of special architectural importance

The existing long unhindered views in this location will be severely impacted

Living alongside a motorway is not beneficial for anyone. The people living there will be affected with noise and bad air quality and their mental health will deteriorate.

There are no social places accessible in walking distance

Lack of play space for little children

This is zone 6 and not zone 1 or 2

There is no benefit to the local community in this development

The overcrowding in the area (urban sprawl), leads to stress and a less enjoyable environment in which to live.

An alternative for this site would be as a retail/leisure facility (bowling/cinema) where noise and air quality would not be such an issue

Fire safety for those in high rise flats

This development will not take into account nature, wildlife and protected trees

Negative impact on nearby conservation areas

Negative impact on and encroaching into the Green Belt

GREATER LONDON AUTHORITY (GLA)

In their Stage 1 report dated 02/12/19, the GLA provided the following comments:

Principle of development

13. The principle of a residential-led mixed-use development on the site has been established through the site's planning history. Furthermore, Hillingdon Council's emerging draft Local Plan: Part 2 - Development Management Policies, Site Allocations and Designations and Policies identifies the site for residential-led, mixed-use development (SA Master Brewer and Hillingdon Circus, Hillingdon (Site B)). The emerging allocation comprises both the site and the vacant land located adjacent to the site on the western side of Long Lane, known as 'Hillingdon Circus'.

14 The London Plan sets a 10-year housing target of 5,590 and an annual monitoring target of 559 new homes per year in Hillingdon per year between 2015 and 2025. The redevelopment of the site to provide a mixed use residential led scheme providing 514 new residential units equates to 9.2% of 10 year target and is therefore strongly supported. Draft London Plan Policy H1 proposes to increase this 10-year target to 15,530, whilst the Panel Inspector's report recommends this be

reduced to 10,830, which remains substantially higher than the current London Plan target. The proposed housing delivery on this accessible brownfield site is therefore strongly supported.

15 London Plan Policy 4.7 and draft London Plan Policy SD6 all set out a town centre first approach to the provision of new town centre uses. The London Plan establishes that edge or out of centre retail development must be subject to an assessment of impact. Flexible floorspace is proposed which may include workspace, affordable workspace, community uses and retail uses, totalling 1,250 sq.m.. The flexible uses are proposed within the ground floors of the blocks at the edges of the blocks fronting onto the public realm. The proposed flexible uses are intended to satisfy the localised need arising from the proposed new homes and the development expected to come forward in the wider area. Given the limited scale of the proposed flexible uses at the site, which fall below the NPPF threshold for the need for a retail impact assessment, it would not prejudice the vitality or viability of the boroughs Town Centre locations.

16 London Plan Policy 7.16 and draft London Plan Policy G2 afford Green Belt Land the strongest protection in accordance with national guidance. The NPPF through paragraphs 133- 147 affords the strongest possible protection to Green Belt. There is a small strip of Green Belt in the ownership of the applicant to the eastern edge of the plot however it should be noted that this does not fall within the application's red line boundary. This land is not proposed to be developed on but discussions are ongoing between the applicant and the Council to secure enhancement works to this parcel of land as part of the S.106 package. These enhancement works should constitute appropriate development on the Green Belt, increasing its value which is supported in accordance with the policies outlined above.

Housing

17 The proposed housing mix is set out below:

Market total = 332 (134 x 1 bed, 154 x 2 bed, 44 x 3 bed)

Intermediate (Shared ownership) total = 61 (34 x 1 bed, 27 x 2 bed)

Intermediate (affordable rent) total = 121 (53 x 1 bed, 35 x 2 bed, 33 x 3 bed)

Affordable Housing

18 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the draft London Plan (Consolidated Version of Changes (July 2019)) identifies a minimum threshold of 35% (by habitable room) affordable housing, with an upper threshold of 50% for publicly owned land. Applications providing the relevant threshold level of affordable housing before public subsidy; with an appropriate tenure split; having explored potential additionality through grant funding; and, meeting all other relevant policy requirements and obligations to the satisfaction of the Mayor and Local Planning Authority can follow the 'Fast Track Route' route as set out within draft London Plan Policy H6 and the Mayor's Affordable Housing and Viability SPG. Such applications would not need to submit a viability assessment, and would not require a late stage viability review mechanism to be secured as part of any Section 106 agreement.

19 Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set out a tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority. If the proposal does not meet the requirements of the draft London Plan threshold approach, and/or if the LPA is not satisfied that the proposed tenure split appropriately responds to local need, an application must be determined under the 'Viability Tested Route' - requiring submission of a full viability assessment for rigorous independent review.

20 The applicant has proposed 35% affordable housing by habitable room before subsidy. The affordable housing tenure mix comprises; 30% shared ownership and 70% London Affordable Rent.

This is strongly supported in principle. The applicant team must agree the tenure split with Hillingdon Council in accordance with the principles of the draft London Plan. The applicant must explore the availability of grant funding to further increase the affordable housing offer and an early stage review mechanism must be secured in the S106 agreement.

21 The Mayor is committed to the delivery of genuinely affordable housing and draft London Plan Policy H7; the Mayor's Affordable Housing and Viability SPG; and, the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products. The applicant has confirmed that in accordance with the Mayor's preference the affordable rented products will be secured at London Affordable Rent benchmark levels. The intermediate shared ownership products should be secured as affordable to a range of incomes below the upper limit of £90,000 per annum, and benchmarked against the monitoring figure of £56,200 per annum in the London Plan Annual Monitoring Report. All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement.

Residential Mix

22 London Plan Policy 3.8 encourages new developments to offer a range of housing choices in terms of mix and size. Draft London Plan Policy H12 recognises that a higher proportion of one and two-bedroom units is generally more appropriate in more central or urban locations. The applicant is proposing the following housing mix:

- 1 bedroom 52%
- 2 bedroom 32%
- 3 bedroom 16%

23 In strategic planning terms the housing mix outlined above is an appropriate response to local need offering an adequate proportion of family sized accommodation given the site circumstances. The provision of family housing has been appropriately prioritised within the social/affordable rent component of the mix, in response to identified strategic need which is strongly supported.

Residential quality

24 London Plan Policy 3.5 and Policy D4 of the draft London Plan promote quality in new housing provision, with further guidance provided in the Housing SPG. The scheme has been designed to meet and exceed national, London Plan and draft London Plan minimum residential space standards.

25 The applicant has confirmed that the blocks will benefit from efficient unit to core ratios, there are no single aspect north facing units and internal spaces will, as far as practical be well-defined, sun-lit. The applicant has also ensured that all units have access to adequate private shared amenity spaces. It is acknowledged that as far as practical the applicant has ensured that all ground floor units have include direct front door access which helps animate the streets and spaces and promote passive surveillance. The exception to this includes buildings 11 and 12, whilst building 8 has a mix of units which have direct access. This is acceptable.

Children's playspace

26 London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Mayor's Play and Recreation SPG and draft London Plan Policy S4 expect a minimum of 10 sq.m. per child to be provided in new developments, and makes clear that play space should not be segregated by tenure. The GLA playspace calculator has recently been refined. Furthermore, policy S4 of the draft London Plan makes it clear that play space in new residential developments should not be segregated by tenure. The scheme has been calculated to produce a child yield of 184 requiring the provision of 1,841.6 sq.m. of playspace. The applicant is providing a total of 2,078 sq.m. which includes the provision of 1,157 sq.m. of playspace for children 0-5 years. This provision exceeds the requirements set out above and should be secured by appropriate planning condition.

Fire safety

27 In accordance with Policy D11 of the draft London Plan, the Council should secure an informative prescribing the submission of a fire statement, produced by a third party suitable qualified assessor, in consultation with the London Fire Brigade.

Urban design

Layout

28 The proposed masterplan would introduce two main routes east to west through this vacant brownfield site - helping to connect the plot in the east, with adjacent Green Belt land to the west. The street pattern created by the above-mentioned primary routes helps to set up a conventional arrangement of blocks either side of the three main routes. There are two routes which run north/south to connect the two primary routes which run across the site. Creating a strong sense of arrival at the prominent south western entry corner is supported. The perimeter blocks would serve to reduce noise and air quality issues to the central spaces of the plot, which have been characterised for community/commercial and amenity spaces. This approach is supported in order to buffer the wider masterplan from road noise. The layout and ground floor of the masterplan is generally supported and seeks to maximise active frontage to the ground floor. Based on the visualisations and plans provided to date, the quality of the proposed public realm strategy is supported. The block layout is broadly supported and strikes a good balance between offering a range of housing typologies, character areas within the site and a legible sequence of streets and spaces.

Height and massing

29 London Plan Policies 7.1 and 7.4 and draft London Plan Policies D1 and D2 require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The application proposes the construction of 12 blocks ranging between 2 and 11 storeys. The intention to contain the taller elements of the scheme towards the western edge of the site including at the entry to the site at Hillingdon Circus which is supported. The blocks which run parallel to Western Avenue (A40) would be a minimum of 5-storeys which would help reduce the noise and air quality impacts arising from the proximity to the highway. The proposed height and massing strategy responds well to the site's contexts with the tallest elements along the south western edge and the lowest components adjacent to the neighbouring Green Belt. The applicant has demonstrated that the development potential of the site has been optimised through a design led iterative process of pre-application engagement with the GLA which has resulted in a successful height and massing strategy which responds well to the immediate context.

Architecture

30 The architecture of the scheme promote visual links to the surrounding suburban context through the use of mansard roofs, arched thresholds and a material palette which respond well to the surrounds. The intention to respond to the established residential character of the surrounding area through the use of architectural features such as pitched roofs, proportions of key facades and materials is welcomed. The plot has been subdivided into a number of character areas which benefit from a distinct architectural approach but which share key details to ensure the masterplan is read as a single coherent piece. All buildings will use brick for the main body of the developments with varying typologies and brick shades establishing the character areas of the site. for example the buildings in closest proximity to the Green Belt have been finished with a green coloured brick. The material palette is supported and does not present any strategic design concern.

Density

31 London Plan Policy 3.4 and draft London Plan Policy D1B 'Optimising site capacity through the

design-led approach' seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the design, as described in draft London Plan Policies D4 'Housing quality and standards' and D2 'Delivering good design'. Policy D2 identifies that proposals with a density of over 350 units per hectare (defined as 'higher density') or include a tall building (as defined by the Borough, or above 30 metres), should be subject to a greater level of design scrutiny, as is the case here. Draft London Plan Policy D1A states that the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels; and be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).

32 Whilst the residential density of the scheme exceeds that of surrounding neighbours, it is an appropriate response to development of a brownfield site, contributing positively to achievement of the substantially higher housing targets of the draft London Plan. The height and massing strategy enhances the character of the area and the design is considered to be of the highest quality. The sites adjacency to the Hillingdon Station and the proposed bus mitigation (set out in the transport section below) ensures there is adequate local transport connections to the site enabling the site to be developed sustainably. GLA officers are therefore supportive of the optimisation of this brownfield site.

Impact on Green Belt

33 London Plan Policy 7.16 and draft London Plan Policy G2 afford Green Belt Land the strongest protection in accordance with national guidance. The NPPF through paragraphs 133- 147 affords the strongest possible protection to Green Belt. The NPPF provides that construction of new buildings should be regarded as inappropriate save for certain limited exceptions set out in paragraph 145. Whilst there is no development proposed in the Green Belt, the scheme will abut the Green Belt land which adjoins the site boundary and extends east. The applicant has ensured through the design of the scheme that any visual impact on this land is minimised as far as possible. The buildings in closest proximity to the Green Belt will be finished in green toned bricks, benefit from a balcony arrangement which seeks to emulate a 'pergola' style and is lower rise than many elements of the master plan. It is understood that the applicant has acquired a strip of Green Belt land directly between the site and the wider body of Green Belt within which enhancement works are proposed to be secured through the S.106. All of these measures serve to minimise the visual impact on the Green Belt and provide a soft urban edge to the open land at this edge of the site.

Heritage and conservation

34 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. Any harm identified must be given considerable weight and importance.

35 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than

substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 'Heritage conservation and growth' of the draft London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non designated heritage assets.

36 The application site itself does not fall within a conservation area, nor does it contain any listed buildings. The Ickenham Village Conservation Area and other heritage assets fall within a kilometre of the site, most notably Ickenham Manor which is Grade I listed and Long Lane Farm Cottages which are Grade II listed. Given the separation distance which exists between the proposed development and the heritage assets which fall beyond the A40 GLA officers are generally satisfied that there would be no harm to the setting of the assets. The comprehensive redevelopment of the site would make the most efficient use of land and optimise residential and non-residential uses which is supported from a strategic perspective. The proposed scheme it is noted would introduces distinctive, high quality architecture, which is scaled to address the established character of the area.

Inclusive access

37 London Plan Policy 7.2 and draft London Plan Policy D3 require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all.

38 London Plan Policy 3.8 and draft London Plan D5 require that 10% of new housing is delivered as designed to be wheelchair accessible and that the remaining 90% are easily adaptable for residents who are wheelchair users. The applicant has confirmed that 10% of the dwellings will be provided in line with the requirements above. This must be secured by way of planning condition.

Sustainable development

Air quality

39 A core priority of the Mayor's London Environment Strategy (2018) is to improve London's air quality and protect public health by reducing exposure to poor air quality, particularly for the most disadvantaged and those in priority locations such as Air Quality Focus Areas, and outlines a range of initiatives which seek to improve the capital's air quality over time, including the Ultra Low Emission Zone (ULEZ). London Plan Policy 7.14 and Policy SI1 of the draft London Plan state that London's air quality should be significantly improved and exposure to poor air quality should be reduced, especially for vulnerable people. Policy SI1 states that development proposals should not create unacceptable risk of high levels of exposure to poor air quality and should ensure design solutions are incorporated to prevent or minimise increased exposure to existing air pollution. The site's northern boundary runs parallel to the A40 which presents noise and air quality constraints for the site. The Council must secure appropriate air quality mitigation measures as part of any future planning permission.

Energy

40 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); Air Source Heat Pumps is proposed in a central block-by-block pump system for each building; and, renewable technologies (comprising 929 sq.m. of photovoltaic panels). A roof plan demonstrating PV installation has been maximised should be submitted. The approach proposed would achieve a 38% carbon dioxide reduction for the residential component of the scheme and a 37% reduction for the non-residential component. Whilst the principles of the energy strategy are supported, the applicant must explore the potential for additional measures to deliver further carbon

dioxide reductions. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.

Drainage and floodrisk

41 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and draft London Plan policy SI.12. The surface water drainage strategy for the proposed development complies with London Plan policy 5.13 and draft policy SI.13.

42 The proposed development does not meet the requirements of London Plan policy 5.15 and draft London Plan policy SI.5 as it does not meet the water consumption targets of these policies. The applicant must provide water efficiency information for both the residential and non-residential components of the scheme.

Urban greening

43 London Plan Policies 5.10 and 7.21 seek to retain existing trees of value, or mitigate their loss, and require developments to incorporate urban greening measures. Draft London Plan policies G5 and G7 go beyond the London Plan policies by embedding urban greening measures and retention of existing trees of quality into the planning process. As set out in draft London plan Policy G5 the Mayor has developed a generic Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities. The factors outlined in Table 8.2 of the policy are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation.

44 The application includes a well-considered approach to green infrastructure, particularly with regard to the site's strategic position for ecological and recreational connectivity. The urban greening factor must be calculated and submitted prior to the Mayor's decision making. A plan colour coding the surface cover types set out within draft London Plan Policy G5 and an accompanying calculation table should also be provided prior to Stage 2. Although a tree constraints plan has been provided, further clarification is required regarding the total number of trees proposed for removal. The proposal should ensure that, wherever possible, existing trees of quality are retained. Where it is imperative that trees are removed, there should be adequate replacement based on the existing value of the trees determined by i-tree or CAVAT.

Transport

Site access

45 Vehicle access via a priority junction is proposed in place of the existing site access location along Freezeland Way, approximately 50 metres east of the Hillingdon Circus junction. Pedestrian access will be provided via access points on Freezeland Way and Long Lane adjacent to Hillingdon Circus. Both are acceptable subject to the details of the highway scheme at Hillingdon Circus being agreed.

Car parking

46 London Plan Policy 6.13 and draft London Plan Policy T6 require developments to provide the appropriate level of car parking provision. A total of 164 car parking spaces are proposed (equivalent to 0.3 spaces per units.). These spaces would be located in podium car parks around the site with some spaces on the internal roads. Of the total provision 16 blue badge spaces will be spread across the site which accords with the draft London Plan requirement. In accordance with draft London Plan policy T6.1 the applicant should demonstrate how and where general car parking spaces could be converted to provide a further 7% of residential units with a blue badge space if required. Six general car parking spaces for visitors and the commercial units are proposed, this is

welcomed. However, at least one of these spaces should be allocated for use by blue badge holders. Electric vehicle charging points will be provided in accordance with draft London Plan policy.

47 Four car club spaces are proposed within the development site. In the first instance one space would be provided upon first occupation of the development, with up to three further vehicles being introduced depending on monitoring / demand. This is welcomed.

48 A draft Car Parking Management Plan has been submitted in support of the application, the final plan must be secured by planning condition. Occupiers should also be exempt from eligibility for parking permits on surrounding streets and on-site spaces should be leased not sold.

Cycle parking

49 Cycle parking meets the minimum requirements of draft London Plan policy T5 is proposed for all land uses. It is welcomed that this has been designed in accordance with the London Cycle Design Standards. Long stay cycle parking alongside lockers, showers and changing facilities will be located within the proposed Cycle Hub located adjacent to Building 4. Continuous access and operation of the 'Hub' must be secured as part of any future S.106 agreement.

Healthy streets

50 A number of interventions at Hillingdon Circus, including upgrades to pedestrian crossing are proposed to support the development. These have been the subject of a Stage 1 Road Safety Audit. TfL requests that further discussion takes place prior to determination of the application to agree the full package of highway interventions.

Public transport

51 The proposed development is expected to generate 88 and 53 two-way bus trips in the AM and PM peaks respectively. In order to ensure that sufficient sustainable transport is in place to support the development, a financial contribution must be secured to increase the frequency of route 278 from four to five buses per hour. The estimated cost of delivering this is £455,000 per annum, therefore the total cost to cover three years pump priming is £1.365 million which should be secured as part of any future S.106.

52 The transport assessment includes a station capacity assessment. This assessment needs to be refined in accordance with detailed comments provided to the applicant in order to demonstrate that the additional trips generated by the proposals can be accommodated within the existing station infrastructure.

Travel planning, delivery and servicing and construction

53 The applicant has submitted a draft travel plan, delivery and servicing and construction logistics plan. Within the travel plan the target relating to increasing car club use should be deleted and replaced with a target better reflecting the ambitions in the Mayor's Transport Strategy to increase active travel. Notwithstanding this, the plans are generally acceptable in strategic transport terms and should be secured by appropriate planning condition.

Local planning authority's position

54 The local planning authority is still assessing the application and yet to identify a target planning committee date. Legal considerations

55 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the

Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

56 There are no financial considerations at this stage.

Conclusion

57 London Plan policies on land use principles, housing, affordable housing, sustainable development and transport are relevant to this application. While the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the following reasons:

- Principle of development: The redevelopment of this vacant brownfield site to deliver a significant quantum of housing and affordable housing alongside commercial and community floorspace is strongly supported.
- Housing: The applicant is proposing 35% affordable housing (by habitable room) at a tenure split of 70/30 in favour of affordable rent comprising London Affordable Rent and Shared Ownership meets the Fast Track Route. The Council must robustly secure the offer in the S106 including an early stage review mechanism.
- Urban design: The design quality of the scheme is considered to be of high quality and the site appropriately optimised. The Council should secure the submission of key facing materials. The proposal would not have an adverse visual impact on the adjoining Green Belt Land or on neighbouring heritage assets.
- Sustainable development: Further information and justification is required in respect of energy, flood risk and drainage and urban greening.
- Transport: The applicant is required to address issues in respect of; site access and healthy streets. The Council must secure by condition/obligation; a car parking management plan, disabled parking provision, cycle parking, a travel plan, a construction logistics plan and delivery and servicing plans in addition to a £1.365 million contribution to increase the frequency of local bus services.

MINISTRY OF DEFENCE (MOD)

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 11/10/19.

The applicant seeks full planning permission for the above proposed development at the former Master Brewer site in Hillingdon. The proposed development comprises the construction of a residential-led, mixed-use development including a number of buildings between two and eleven storeys, landscaping, SUDS and other associated infrastructure.

The application relates to land close to RAF Northolt, an airfield that accommodates units from all three-Armed Services and provides a home for both 32 (The Royal) Squadron and 63 Squadron RAF Regiment (Queen's Colour Squadron), during the 2012 Olympics Northolt hosted four Typhoon fighter aircraft. The application site is located 1.96km west from the centre of the runway at RAF Northolt and approximately 1.1km west of the threshold of runway 07/25. The site occupies the statutory height, birdstrike and technical safeguarding zones surrounding RAF Northolt.

Aerodrome heights and Technical safeguarding zones

The proposed development site occupies the statutory aerodrome height and technical safeguarding zones that ensure air traffic approaches and the line of sight of navigational aids and transmitters/receivers are not impeded.

The airspace above and around aerodromes is also safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre.

Having made safeguarding assessments based on the grid references of the four corners for each proposed tower block (12 in total), I can confirm the MOD has no safeguarding objections regarding the proposed building heights for this development.

Birdstrike safeguarding zone

The application site is also within the birdstrike safeguarding zone, within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.

Several of the buildings are proposed to have brown or green roofs of varying design, including brown roofs and ornamental roof terraces. These have the potential to be attractive to roosting / nesting hazardous birds such as large gulls.

The drainage strategy for the site includes green roofs, permeable paving, rain gardens and swales. Other than the green roofs, the other aspect of this which has the potential to attract or support hazardous birds are the swales. These are to be planted with a wetland meadow mix comprising a range of flowering plants and grasses and would appear to be generally dry. As long as they are usually dry, and the planting is maintained then this should prevent these features resulting in an attractant for hazardous birds.

The developer has submitted a Bird Hazard Management Plan (BHMP) to mitigate any potential birdstrike risks / hazards. Having reviewed the plan the MOD can confirm the provisions set out within the BHMP would provide a robust and effective mitigation of the risk posed by the development, it is requested that any permission issued is subject to a condition requiring that the development is carried out strictly in accordance with the submitted BHMP and that those measures set out within the BHMP are implemented in perpetuity.

In summary as long as the swales are generally dry and the BHMP is included as a conditional requirement (and in perpetuity) as part of any planning permission granted, the MOD has no objections to this development.

Cranes

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

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

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence. The Construction Management Strategy shall cover the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting).

The approved strategy (or any variation approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence) shall be implemented for the duration of the construction period.

Reason:

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

Subject to the inclusion of the specified conditions in any planning permission granted, the MOD maintains no safeguarding objection to this application.

I would be grateful if you could confirm receipt of this letter and confirm that conditions meeting the MOD's requirements are included in any consent granted.

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

External Consultees (Additional)

OAK FARM RESIDENTS ASSOCIATION

The Oak Farm Residents Association (OFRA) wishes to object to the planning application above, primarily in respect of its excessive height, density and massing and the extra burden on local health and education services, but also to the detrimental impact this will have on our local environment and its semi-rural, suburban character.

In scale and style this proposal fails to harmonise with its environment and would dominate its surroundings to such an extent that it would detrimentally change the established character of the area. In our opinion, the proposal comprehensively fails to respect national, London and local planning policies which ensure that any development is in keeping with its locality. The proposed density is over twice the prescribed norms.

The key planning constraints of the site are well known:

- chronic congestion at peak and surrounding hours,
- severe noise levels that either breach WHO ambient guidelines for residential areas, or sit in the upper tolerance zones, even after mitigation measures have been applied. Noise levels regularly exceed 100db at the boundary and 90db at some parts of the site,
- existing poor air and particulate quality will be made even worse with a development of this density and scale.

All of these issues point to the need for a much smaller and more sustainable development which respects local character and the scale of its surroundings.

We are concerned that the current proposal ignores almost completely, the clear planning guidance given by Hillingdon Borough in its rejection of the similar, but smaller, MB Homes' proposal earlier this year, and significantly scales up the development in size and density, increasing the maximum height to 11 storeys. The only concessions have been minor architectural design features, with limited introduction of dormer style roofs, better architectural landscaping and biodiversity schemes at ground level.

The proposal is totally out of keeping with its locality and at the current scale, style and height is in no way responsive to local needs, or representative of the feedback from residents. The Planning Case Officer should also note that the applicant has cleared trees and vegetation in the central section of the land, including a TPO marked area, despite the advice of initial ecological and biodiversity assessments which noted the site's potential habitat value and its proximity to SSSI's and which stated specifically that no work should be undertaken until more detailed assessments have been completed.

It is fair to say that the current submission has generated dismay and disbelief in the local community, with Inland Homes choosing to increase size of the development by more than 20% over its rejected predecessor. Stakeholder and community consultation has clearly been a tick box exercise, as OFRA residents argued strongly that the 9 storeys shown in the designs presented to us in the initial meetings were already too high. GLA comments are similarly detached from the realities of the site, and are selective in their interpretation of planning guidance, simply promoting a higher housing density. It should also be noted that Hillingdon has consistently exceeded its target for new homes and reached 160% of target in 2017/18.

While as an Association we welcome the proposed 35% affordable housing and the reduction to 0.3 parking spaces per unit, because the local road network simply cannot handle any additional traffic, our objections to the proposal are substantially the same as those against the Meyer Homes' plans in 2018. At the newly proposed scale, height and density the impact of this development would be detrimental to local quality of life, increase local congestion and be completely out of keeping with local expectations. These expectations were clearly voiced at Residents' Meetings and at Inland Homes' consultation / exhibition. Residents are dismayed that a few individuals' comments were reported selectively and out-of-context in the report submitted to the planning committee by Terrapin Communications. Although these personal views were positive, the general consensus of the Residents' Association is that these plans are too high and too dense.

Headline issues

The proposal provides a scheme that ignores London Plan Policy D1 B 1 which states that development design should respond to the local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including existing and emerging street hierarchy, building types, forms and proportions. Comments by the GLA planning team suggest that it has again been selective in its interpretation of the London and Draft London Plan policies and commitments, in order to steer the developer in the direction of a higher density scheme which ignores local character, prevailing style and the planning constraints of the site. This is a noise sensitive, poor air quality location with appalling congestion at peak hours. A development of this density will negatively impact air quality and local infrastructure. To date the GLA has failed to appreciate the specifics of the site's surroundings or to consider the risks to public health of such a high-density development in this location.

The design remains central-urban in nature and scale, dwarfing and dominating its immediate surroundings; building style and appearance do not harmonise with locally prevailing design and height, with only minor local architectural references included. The current design would substantially alter the character of the suburban locality and be detrimental to and dominate the local amenity.

The height and density of the development has increased from the previous scheme. The previous Townscape assessment acknowledged that the scheme would have a High Adverse Effect, changing the existing roofline and scale of the streetscape at Long Lane, Freezeland Way and Hillingdon Circus. The assertion in the Bradley Murphy Design architects' assessment (2018) that this would be prominent but in equilibrium with prevailing townscape characteristics was absurd. Given the increased height and scale of the new proposal, any assertion that the overall design harmonises with local environment is now even less credible, and was contradicted by the Montagu Evans assessment in 2017/18 for the same site. Scale-up was acknowledged by planning authorities to be too high even at the 7 storeys proposed previously.

The updated Bird Hazard Assessment re-states that the height and predominately flat roof design will create a habitat attractive to species observed in the locality, and on completion risk changing the balance of current wildlife populations, weighted towards those species more hazardous to aircraft, therefore increasing the likelihood of Bird Strike. Given the site's position next to RAF

Northolt and potential changes to mixed use air corridors, this is a major concern and remains a risk that has not been adequately considered.

The Acoustic Noise Impact Assessment demonstrates that in its current form the development fails to meet maximum WHO and BS8233 standards for community noise, and the ratings applied were lower than they should be for a noise sensitive development that potentially achieves a SOAEL rating. We request that the Borough makes its own independent assessment to confirm the findings. Nearly all areas of the development continue to exceed the LAeq 8hr 30db noise limit for bedrooms at night, even after design mitigation and insulation has been applied. These constraints can only be addressed by a lower density, less intensive development.

The London Plan states that noise sensitive development should be separated from major noise sources by distance and screening. As before, this proposal does not effectively provide this, with the accommodation facing Long Lone and beside the A40 and tube-line currently too close to the roads and major sources of noise to provide suitable conditions for habitation.

The Local Plan states that London Borough of Hillingdon will seek to ensure that noise sensitive development will only be permitted if noise impacts can be adequately controlled. Currently this is not the case.

The Mayor's Ambient Noise Strategy states that proposed development should have particular regard for the impact of aviation noise on noise sensitive development, but aviation noise has not been included nor incorporated into measurements supplied to date, the current assessment is therefore not fully evidenced to the standards dictated by GLA commitments and policy.

Detailed objection points

Given the constraints of the site, which are highlighted throughout the Borough's planning and local implementation guidance, the new scheme is unsuitable in housing density and scale, which both far exceed established norms in the surrounding areas. Its height and appearance are of central-urban design and would have significant and negative impact on the local amenity, which is characteristically suburban in nature.

The increase in scale above the buildings in Hillingdon Circus and the surrounding area remains too great at over three times (four in places) the existing streetscape.

Harmonisation is poor, with the overall design representing a complete departure from the prevailing style and landscape of its surroundings. The overriding visual impression is of a development conceived without due regard to its surroundings;

Existing greenbelt views would be significantly compromised at points in Hillingdon East (from Granville Road, Freezeland Way, Hillingdon Circus) and the proposed scheme would be overbearing from Ickenham Manor and the Ickenham Marshes conservation area and its approaches;

The dominant outline and scale of the design is exacerbated by its core flat-roof design in an area that is predominantly pitched. The low-rise nature of local buildings is the prevailing feature of the Ward as a whole. The current design makes only minor concessions to this local feature, and in a very small number of areas;

Local buildings are almost exclusively two-to-three storeys and of suburban Metro style, interspersed with older village centres. Since its construction nearly a century ago, the design of the shopping parade at Hillingdon Circus has hardly changed. Views from Hillingdon station currently present an unbroken tree line in all directions. At an average height of eight floors the proposed development would irrevocably damage this setting and view. The report by Montagu Evans in 2018, prepared for the previous application by Meyer Homes, clearly states that without significant

reduction in height and softening of the upper storeys' appearance, the scale of the buildings would negatively impact the local environment. This new proposal exceeds the height of its predecessor;

The site sits in a TfL and Borough air quality focus zone. Planning approval at this scale and density would inevitably produce an increase in congestion and car movements, and would negatively affect air quality. The scheme is projected to add around 100 car and passenger journeys to Hillingdon Circus at peak hours, however given the overall size of 514 units we consider this to be an underestimate that doesn't adequately consider potential pick-up traffic or taxi use that will certainly be generated by a development of this size. We are also concerned that no consideration has been given to car-ownership above the 165 parking spaces.

The Borough has well-stated commitments and targets in Local Transport, Environmental and Air Quality Plans to reduce congestion and improve air quality levels at A437 Long Lane /A40 Freezeland Way. Of the total NO2 emissions for Hillingdon, over 51% is from ground-based transport. This is the highest percentage and per capita figure for all the London boroughs. Even a 0.3 parking ratio will significantly increase congestion, but the assessment fails to give due weight to the fact that traffic is often at a standstill and any traffic attempting to enter and exit the site would be entering directly into a pinch point, and have a higher knock-on effect. The Transport assessment assertion that there would be a negligible increase in car journeys fails to consider the impact that even a small increase will have at this junction.

The starting assertion in planning terms, that the Master Brewer site represents an 'island' and should therefore (for so-far unsupported reasons) allow higher housing densities to be considered, is false. Existing projections and aspirations of both LBH and potential developers for additional development at site B, culminating in a fully developed and linked residential and mixed intersection, are well documented and therefore become material in the consideration of housing density. In fact, national planning guidelines promote this as a consideration for a lower density, spatially- spread development.

Architecturally the proposal indicates large urban blocks and is completely unrepresentative of the prevailing style around it. At ground level the visual impact is reasonable, showing soft landscaping, and we welcome the reported involvement of the London Wildlife Trust, however the design fails to reflect the local, largely residential character; it has a flat roof design in an area that is predominantly pitch-roofed. As a basic large block design, it fails to meet the key design brief to provide a visual link or extension to Hillingdon Circus.

Similarly, the proposed landmark building is around three times the height of the buildings opposite and would dominate the Hillingdon Circus junction. This level of scale-up is physically and visually overbearing;

At eight, nine and eleven storeys, the height of the northern buildings, even considering the topography of the site, is too high. As stated, established development surrounding the site is mainly two storeys (three including accessible roof space) for at least a 1.5 miles in all directions, with the exception of one small building in Hercies Road, and the new Express Dairy development behind the shops in Long Lane. The current design would rise, on average, three storeys above the chimney height of the Swallow Public House opposite (current highest point in the area) increasing to 6 storeys above average for the proposed 11-storey building.

Assessment against the Mayors Healthy Street Indicators (Transport Assessment sections 4.6 and 4.7) confirms vehicle dominance on surrounding approaches to the site, with traffic frequently at a standstill, but it fails to give any evidence of how the development will address this or achieve improved uptake of sustainable travel as part of its mitigation response.

Mitigation measures against the street noise of key routes are either missing or weak.

Health services in the immediate area are already oversubscribed, particularly the GP and dental surgeries. Local services cannot support development at higher than currently established densities. These services are already difficult to access at peak hours, because of congestion levels. Local Primary schools have already been enlarged and are approaching full capacity. Pedestrian access would require under-11s to negotiate major roads and busy junctions, with a 30-minute-plus walk. Residential roads around the schools already suffer from major congestion at school times.

Air Quality and Noise Disturbance

Air Quality and Noise pollution are two of the three major constraints present at the Master Brewer site (the third being the congestion of the immediate road network). National Planning and GLA guidance state quite clearly that there should not be a presumption for development where these limits are routinely exceeded. As air quality and noise pollution exceed legal limits, should the building go ahead, then scale, housing density and layout should be designed to effectively mitigate these risks.

Internally, individual dwellings should be of a size that mitigates these risks, separating noise sensitive areas from major noise sources. Screening, distance and internal layout should be employed in preference to relying on sound insulation (London Plan Policy 7.15). The proposal's density and scale fail to meet these requirements and the Ambient Noise Policy guidelines.

The proposed layout with a solid outer wall of buildings, would act as a partial barrier to the A40 and tube line noise levels, but the high density and the number of units proposed would increase individual exposure. Exposure at the sixth, seventh and eighth floors at the perimeter will be higher because of continuous and greater all-round exposure.

The Noise and Acoustic assessment supplied by the applicant demonstrates that the proposal currently breaches acceptable limits for residential accommodation during both day and night; the maximum limit is 55db (day) and an ambient 45db at night. FOI figures from 2017 recorded measurements of 83db, 78db and 90db during the day and 78-74db / 88-84db ranges at night at the site boundary. Measurements quoted for previous applications by Meyer Homes' consultants recorded inner amenity areas at 55-60db which exceeds the upper WHO limit for residential developments. Perimeter measurements taken this year using a Smart Phone app recorded 90db with a consistent exceedance rate of 70db. On these grounds alone, housing density, height and upper floor design need to be revised and scaled back to cope with noise disturbance. Currently, few areas meet acceptable standards:

- Building 1 - only the rear (east) will meet the BS8233 guideline levels;
 - Buildings 2, 3 and 4 - only the courtyard within the buildings will meet the BS8233 guidelines;
 - Buildings 5 and 6 - the podium area between the buildings will exceed the BS8233 guidelines;
 - Buildings 6 and 7 - the podium area will only partially meet BS8233 guidelines;
 - Buildings 7 and 8 - the podium area behind will only partially meet BS8233 guidelines;
 - Buildings 8 and 9 - the podium area between will exceed the BS8233 guidelines;
 - Building 10 - only the west side will meet the BS8233 guideline levels;
 - Building 11 - the south and west side of building will exceed the BS8233 guidelines;
 - Building 12 will exceed BS8233 guidelines, only the south side will comply;
- The central area will not meet the BS8233 guidelines, with the exception of a small area;

DEFRA noise mapping (noisemapping.defra.gov.uk) confirms the above, and shows that noise levels from roads and land immediately adjacent to the A40 are high, regularly in excess of 75db, and frequently exceeding 100db.

Section 4.1.3 of the Noise assessment appears to be flawed and should be reexamined. It states that policy guidance given in the Planning Practice Guidance (PPG) for assessing impact of noise on patterns of behaviour, quality of life, and the character of the area should not be applied (and

therefore hasn't been). On the basis that the site is currently empty, residents would be moving into an existing situation, and behaviour is therefore already set in terms of impact and effect. Therefore the consultant ignored any impact or behavioural change the proposed development itself may have. This is an obtuse interpretation of planning guidance. Fully applying the criteria would most probably result in the site being categorised at the Significant Observed Adverse Effect Level (SOAEL), which requires additional planning considerations be taken into account. At this level, amenity space can be considered unusable, and is the level above which significant adverse effects on health and quality of life can occur.

The Noise assessment asserts that noise level breaches are acceptable because residents have access to quieter green spaces within a "5min walk" of the site - namely Elephant Park. As we highlighted to the LBH planning department earlier this year, this is misleading because this park suffers similar noise conditions, and access requires negotiation of busy junctions.

Local Transport Network

- The Mayor's Climate Change Mitigation and Energy Strategy sets out the Mayor's vision of London in 2025 as 'the greenest big city in the world, with a thriving low carbon economy', and, focusing specifically on transport, 'London's transport network will be well on the road to zero emissions', also reflected within the MTS13. With this in mind, Hillingdon has completed its own Climate Change Strategy, and its Sustainable Community Strategy prioritises 'Protecting and enhancing the environment' as one of its six broader goals. This includes the objective to 'mitigate and adapt to climate change, reducing emissions across the borough'. This objective is also a feature of the West London Sub-Regional Transport Plan, and has been retained in the LIP. Of the total emissions for Hillingdon, 51% is from ground-based transport - 6.2 tonnes per capita. This is the highest percentage and per capita figure for all London boroughs. AM and PM peak delays show that Hillingdon has the 7th highest AM peak delay of all London boroughs and the 10th highest PM peak delay. Of the 30 identified hotspots, nine locations are considered high priority (as a result of LBH and TfL assessment) and are to be considered as part of the plan to reduce congestion and smooth traffic flow. Eight of the nine locations are on highway routes maintained by Hillingdon, including the A437 Long Lane/A40 Freezeland Way junction - the site location. Congestion is now so heavy in the immediate and surrounding area that a reasonable argument, on public health and quality of life grounds, is that any sizeable development should be postponed until TfL has taken action to reduce it.

- The proposal suggests that "associated highways infrastructure" would be redesigned, but no details have been given.

Conservation and Heritage assets

- The Ecological and Biodiversity survey states that MAGIC records a Priority Habitat within the site boundary, supporting nesting birds, and potentially bats, reptiles, invertebrates and hedgehogs. The site also lies within the Impact Risk Zone for two SSSI's (Frays Farm Meadows and Denham Lock Wood). To date, there has been no further elaboration of these implications, by either the Borough Planning Department or the applicant. The status and scheduling of the required surveys is unclear; these surveys can only be undertaken between March and September (for bat scoping May-September) before final approval is given.

- As noted in the opening summary, tree and vegetation clearance at the centre of the site which included a TPO marked area was undertaken this summer without providing the Council with advance notice (5 days notice should have been provided)

- Under the current proposal, approximately 20 grade A&B trees and one TPO'd Oak will be removed, in addition to those removed in the summer clearance. These trees, especially those with TPO, should be retained in the design.

· Consultation with English Heritage (now Historic England), has highlighted the lack of archaeological baseline data for the area, and that the archaeological resource of the area has been 'severely underestimated'. The proximity of the site to medieval activity in Ickenham and the results of the Harefield to Southall Gas Pipeline investigations, which revealed prehistoric, Roman, medieval and post-medieval features and artefacts, implies a potential for previously unrecorded archaeological deposits within the site boundary. English Heritage provided a further update in 2011 highlighting again the potential for archaeology within the area of the site, and providing further details of the gas pipeline investigations, which identified evidence of late Iron Age / Roman period settlement activity, agricultural land-use and possible ritual sites within 700m of the proposed development site. English Heritage also stressed that the site is surrounded by areas which contain archaeological evidence of land-use and activity dating from the Iron Age through to the medieval period, and therefore considered there to be a reasonable potential for archaeological activity within the site. Section 1.4.7 of the heritage asset survey confirmed that evaluation trenches would be required (because of recent archaeological discoveries in the surrounding area); although judgement will be required on the scope, position and number of trenches. Policy HE1: Heritage The Council will: conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and archaeologically significant areas, including Archaeological Priority Zones and Areas. To date there has been no confirmation of when these surveys will take place, and this should be a condition prior to any works taking place.

In conclusion, OFRA strongly objects to this proposal because of its height and density, and the overwhelming effects of over 1000 more residents on already-overstretched local health and education amenities.

Whilst we all agree that this site (and site B across Long Lane) needs to be re-developed soon, this cannot be at such a heavy cost to the quality of life of existing residents. For the scheme to harmonise with the local environment, the overall design height needs to be reduced to a maximum of 4-5 storeys, and roofs and uppermost floors should be pitched, recessed or have dormer elements introduced to soften the impact. These recommendations have already been made by independent peer reviews for previous designs, and could help to alleviate many of our residents' concerns.

OAK FARM ADDITIONAL COMMENTS (JAN 2020)

Having reviewed the Visual Impact Addendum (TVIA) supplied by the developer, logged 23 December 2019, and the earlier Transport Assessment Addendum, OFRA wishes to make the following additional comments:

Overall, the TVIA supports our belief that the proposed development is excessive in height, density and massing, and will have a detrimental impact on our local environment, its character and local amenities and infrastructure.

The TVIA clearly shows that the proposal remains, in scale and style, a design that fails to harmonise with its local environment and confirms its dominance over the immediate surroundings - as well as from a distance - to the point where it will detrimentally change the established prevailing character of the area. It also ignores planning regulations designed to ensure that any development remains in keeping with its locality.

Detail -TVIA 23 December (Wire documents)

· The TVIA demonstrates that the proposal ignores London Plan Policies stating that Development Design should respond to the local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the local building forms and proportions.

- TVIA viewpoints 3B, 4C now clearly show that the scale-up at the Circus will alter the prevailing characteristics, while viewpoints 5C, 6, 7, 9,13, 15 show the design dwarfing and dominating both its immediate surroundings, and the wider locality. The current unbroken tree line shown in the 5C panorama (and from this position, visible in all directions) will be lost, with greenbelt and horizon views severely compromised.

The proposed design would alter the character of the semi-rural locality, dominate the local amenity, and compromise views from historic and open-land sites such as Ickenham Manor.

- The height and density of the development has increased from the previous proposals of 2017-18. The Townscape assessment made then, acknowledged that this scheme would 4266/APP/2019/3088 - "Master Brewer site" - OFRA additional objections, have a High Adverse Effect, change the existing roofline of the street and the scale of the streetscape at Long Lane, Freezeland Way and Hillingdon Circus.

- The current BMD assessment - based on the vista3d visuals - that the design would overall have a minor adverse impact on its local area, is purely technical and not credible, given that the visuals supplied, and the contradictory assessments made, were based on previous designs whose height and scale were smaller.

- We wish to re-state that local buildings are almost exclusively two-three storeys high and of suburban Metro style, interspaced with older village centres.

The southern side of Hillingdon Circus itself is largely unchanged in design since its construction nearly a century ago. As noted above, views from Hillingdon station and other vantage points present an unbroken tree line in all directions. At heights of eight, nine and eleven floors the proposed development would irrevocably damage this setting and views. Consultants have previously stated (at proposed heights of 'only' eight and nine floors) that without significant reduction in height and softening of style, the buildings will always present a scale and appearance that would negatively impact and not be in keeping with the local environment.

Traffic Assessment Addendum - 9 December 2019

The TA Addendum shows traffic increases over the 2017 data at three key problem sites.

- These are the sites that will be most heavily and immediately impacted by traffic entering and exiting the site. Even proportionately small traffic increases will have a heavy knock-on effect in peak hours, particularly given the current layout of the road network and the Circus itself.

- Overall increases are stated as insignificant and small but total between 700-800 vehicles per day at each of these sites over the two-year period. At this rate of increase, Mayoral Healthy Streets targets are unobtainable.

- The TA Addendum notes that problems were experienced with the ATCs in week 2 (4th-10th October 2019), therefore only week 1 data (27th September - 3rd October 2019) has been reviewed. But no explanation has been given as to the potential impact of these problems on the data or conclusions.

- Sites 4 and 5 are almost entirely dependent on traffic flows from the A40, for which no corresponding data has been supplied.

- The lower journey times shown by GPS traffic data on 5 of the 6 routes does not reflect local experience and may have been affected by the use of amended and shorter staggered measurement points to compare data.

- The data at site 7, showing a significant decrease in journeys, does not correlate with the increases in journeys at sites 1, 2, and 3 - into which it is the main feed and in close proximity.

This decrease in number of journeys does not reflect the daily journey experience of our residents.

- Figure 7: AM peak - Camera 1: 08:05 (2017 vs 2019) on page 23 presents a scene that is completely unrecognisable to a regular Long Lane road user, who would not recognise the pictured volume of traffic as being representative of their daily experience. We would ask if further footage could be obtained.

Long Lane traffic from Hillingdon Station does not regularly clear the lights as suggested.

Figure 13 (page 29) is more representative of average daily conditions (with the exception of traffic approaching Hillingdon Station which is shown as considerable lighter than usually experienced).

- Similarly, traffic approaching from Freezeland Way (page 29) very rarely clears the junction in one signal cycle at peak hours, unless approaching traffic from the A40 is impeded.

Conditions on the A40 have not been referenced.

4266/APP/2019/3088 - "Master Brewer site" - OFRA additional objections,

Finally, as noted in our main objection last year, the assessment against the Mayors Healthy Street Indicators (Transport Assessment sections 4.6 and 4.7) on similar routing, confirms vehicle dominance on surrounding approaches to the site, with traffic frequently at a standstill.

In conclusion, we consider that the additional information presented at the end of 2019 merely reinforces our original concerns and objections.

ICKENHAM RESIDENTS ASSOCIATION

On behalf of the residents of Ickenham, we object most strongly to this inappropriate development proposal at the former Master Brewer site.

We are making our initial objection now, despite not having received additional information and drawings requested at our meeting with London Borough of Hillingdon re this proposal. In addition, our objection on traffic grounds will need to follow as the appendices in the planning documents are incomplete.

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

Visual Impact

This proposal is totally out of character with the surrounding area in relation to its size, bulking, mass and design. It would be incongruous placed alongside all other buildings in the immediate area, and completely alter the skyline. This size, scale and bulking of the proposal is more akin to a central London site, not a 'Local Centre' as defined in the UDP (Saved Policies). At a maximum height of eleven storeys it is higher than most of the flats and Offices in Uxbridge, an area designated a Major Town Centre.

The Master Brewer Site sits adjacent to important views from immediately adjacent, and distant, views of Green Belt land, is adjacent to a Local Conservation Area, and nationally listed properties, within the 1 Kilometre radius. The existing buildings in the more immediate vicinity of the development site are mostly 2-3 storey shops/flats built in a clearly residential style and 2 storey houses.

The Development will be the first buildings to be seen on arriving in Hillingdon from the west on the M40/A40 roads transforming from open country side views to a brick collection of monolithic, 5 to 11 storeys, up to 30m, tall massive blocks of flats before proceeding back to open country again on the A40 past Northolt Airfield on one side and open fields on the other.

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

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

Item 1 for refusal in the Officers report stated that :-

"The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt and would mar the skyline"

The major difference between this application and the previous, in relation to the issues above is that THIS APPLICATION IS EVEN BIGGER and we feel the Officers report has not in any way been mitigated.

See attached photographs and viewpoints regarding Visual Impact.(New MB Collage Nov 2019)

Community facilities: The development of the Master Brewer site offers an excellent opportunity to establish new much needed community facilities in the area. A community centre and/or a pre-school would satisfy obvious local needs. The applicant seems to have not considered any of these matters.

Gated communities: Several recreational spaces within the proposed development seem to be 'gated communities'. While we understand the desire to ensure that the development is safe, there is no impediment to securing this outcome by sensible design. Gating parts of the development will result in segregation. We want the new development to form part of the existing community. A gated community risks creating a 'them and us' mentality.

Access to green space: Clear assurances were given to the Residents Association by the developers that access to a new green Belt park would be included in proposals. They insisted that an agreement with adjoining landowners had been secured. We view the relationship between the development site and the adjoining green space as an important design consideration and are hugely disappointed that the developers have failed to deliver their commitments on this matter. Furthermore we feel that the developers have acted disingenuously by using images of open access from the site to the green Belt area on their design and access statement. It seems that no access has been agreed. No new park is planned. These are broken promises.

Ambiguity on green technology: The waffle provided in the application on green energy is extensive. There seem to be no clear aims or targets, just 'ambitions' which we suspect will be ignored

Pedestrian Safety: There is much emphasis in the application to restrict car ownership, by restricting car parking space and increasing cycle spaces. This implies that a large majority of the 1200 to 1500 inhabitants will require pedestrian access and egress to and from this ISLAND SITE by way of pedestrian crossings in order to 'safely' cross the surrounding major carriageways. From previous studies we have carried out, we know how long it takes to traverse these crossings 'legally' and there will be a great temptation to 'take a chance' and cross one of the several MAJOR roads, to access shops, transport or the station. This we believe will constitute a major safety hazard. We know already the serious limitations on traffic flows and congestion at the Hillingdon Circus junction and ANY increase in the meagre timings for pedestrians will seriously impact further on such traffic.

Recycling facilities: The application seems to fail completely to recognise the opportunity to install a sensible system to allow residents to recycle. Recycling rates across flatted developments in Hillingdon are consistently low...the traditional system of providing communal bins at ground level has been abandoned in many areas of the borough, leaving residents without 'curb side' options. All over London new developments are implementing modern systems to address these sorts of issues, but again, this proposal has failed to recognise local issues

"Series of tall buildings": The only suitable areas for tall buildings are Uxbridge and Hayes - clearly unsuitable in this location.

Design: we were impressed by the contextual analysis of the local built environment character. We were not impressed by the way this analysis was represented in the design. We found only very limited evidence of this, with some pointy roofs on some of the blocks that back onto the A40. The focal point building on the corner of the Circus lacks visual interest and the arched design for the non-residential units seems completely out of context for the area. The nearest commercial railway arches are at Ruislip Gardens, maybe there was some confusion with the 'gardens' reference? The design seems to lack permeability and character. It is not clear how residents would access the station, and it is not clear whether improvements to the pedestrian access to the existing shops would be improved.

To deliver residential densities above those set out in the planning policy for this site, we would expect to see a genuinely outstanding design. The proposed design leads on creating a 'garden community' with green infrastructure flooding in to the development from adjoining green space. Even if this were true, the various other issues with the proposed scheme would provide sufficient grounds for refusal. But this development does not seamlessly flow into a new park. Land ownership and access issues are not addressed. No funding to create or manage a park is mentioned. 'Hillingdon Gardens' is actually 'Hillingdon Towers'.

We ask the developers to go back to the drawing board. They confirmed to us that they were aware of the community masterplan that several local groups pulled together as part of the emerging Ickenham Neighbourhood Plan. We suggest they start with that document and engage sensibly and honestly with local people and a sensible compromise can be found.

Density of the proposed development

The application site has an area of 2.48 hectares and a PTAL of 2-3. There are two site categories in the Local Plan relating to PTAL 2-3 sites:

1. Other Town Centres
2. Residential Areas with suburban character within 800m of a town centre

The site in question is not a town centre nor within 800m of a town centre. However it can be described as having a suburban character being opposite the row of two-storey houses in Freezeland Way and close to the suburban style shopping parade of Hillingdon Circus. Therefore this is the most appropriate category which has a density recommendation of 50 -110 units per hectare for a development of mostly flats or 124 to 273 units for the whole site. This is consistent

with the Site Allocation of 250 units for this site (but including the extra strip of land adjacent to the site next to Freezeland Way ie 3.3 hectares or 76 units per hectare) in the Local Plan Part 2. However the proposed number of units is 514 units, around twice the maximum appropriate density for the site. Even if the site were to be considered a town centre (which it is not nor would it be recognised as such in the Local Plan) the maximum would be 421 units.

It should further be noted that this is a site designated for residential-led mixed use. The proposal has a derisory 2% of the area reserved for uses other than residential. Were a more reasonable minimum of 10% allocated to other uses, then the maximum of 273 residential units would be reduced to 245, again wholly in keeping with the site allocation.

If the proposed development kept to this reasonable maximum of 250 residential units it would enable the maximum height of the buildings to be reduced to 5 storeys rather than the 11 storeys proposed. In the Local Plan the site is not considered suitable for high rise buildings. Therefore the application should be rejected on grounds of over-development.

Traffic

To repeat our concerns - it is clear that a development of this magnitude would generate considerable traffic movements in a junction that is already frequently at capacity.

The proposal still does not show (through lack of traffic simulation evaluation) that it complies with UDP AM7, as follows:

UDP - am7 the Local Planning Authority will consider whether the traffic generated by proposed developments is acceptable in terms of the capacity and functions of existing and committed principal roads only, and will wholly discount any potential which local distributor and access roads may have for carrying through traffic.

The local planning authority will not grant permission for developments whose traffic generation is likely to:

(i) unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network; London Borough of Hillingdon UDP Saved Policies September 2007 (Published Version) 252

Trip Generation

In the initial proposal the following was stated.

Trip generation (6.2.1) is given to suggest how many extra car (etc.) journeys will be made. This is given in Appendix H. Actually, it appears to be given in a Trip Generation document (Part-6), page 2. Three sites are given as the basis for trip generation using TRAVL. This is due to the following request by TFL as commented in 1.2.1.

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

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

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

In the new version the following is stated concerning the TRICS site selection (5.2.4).

"These sites, though not directly comparable with the proposed development with regards to number of dwellings or parking ratio, are recently built developments in similar outer London locations that are considered representative of the forthcoming scheme."

This basically says the TRICS data and conclusions made from these are worthless (e.g. the rest of the discussion (5.3.2) onwards). It is highly likely these were selected to give the best outcomes regardless of actual reality.

Vehicular Trip Distribution

Again, from the previous objection

- In 6.5.1 it is mentioned that a trip distribution and assignment methodology has been agreed with TfL which follows the methodology used in the 2012 Transport Assessment (correspondence in Appendix A (actually Part 6)). It is stated that "for consistency" the same development trip assignment turning proportions identified in that assessment (which were based on turning counts) have been used for this assessment. As such, it is envisaged that 25% of traffic will arrive / depart from the north, 25% from the east, 25% from the south and 25% from the west.
 - This is an arbitrary assignment. It is our experience that an equal 25% split is far from reality. Evidence from a real survey is needed to support these figures.
 - Further observations on additional trip justifications: 6.6.3 mentions the additional traffic from the RAF Uxbridge development. However, there is no real justification for the figures. This is the same with the RAF West Ruislip development (6.6.4) and the Swakeleys School expansion (6.6.5). There appears to be a failure to account for these properly.
 - In 6.6.8 they claim that the above accounts for additional trips and then claim in 6.6.9 that as an office development at HC will not be going forward these will be less. This makes no sense as the above is independent of the office development.
- In this version this is referred to in 6.2.1.

"6.2.1. As part of the Transport Assessment submitted for the 2017 application, extensive highway modelling was undertaken with TfL to assess the impact of the scheme on the highway network. The proposed development has therefore been compared against the 2017 scheme to assess if further traffic modelling is required."

This fails to address the above comments. Further

"As shown in Table 6-1, when compared with the 2017 scheme, the vehicular trip generation associated with the proposed scheme reduces marginally during both the AM and PM peak hours. Based on this, it is considered that the current scheme proposals would have a marginal benefit in terms of highway impact during peak hours when compared with the 2017 scheme. It is therefore considered that the extensive traffic impact assessment work that was undertaken during 2017 and 2018 in connection with the previous scheme and reviewed in detail by TfL remains valid for the new scheme, and therefore no additional traffic impact assessment work is required in connection with the proposed scheme. The Traffic Modelling Addendum which outlines the impact assessment is contained at Appendix L, whilst a Hillingdon Circus Signal Optimisation note is contained at Appendix M."

THERE ARE NO APPENDICES L AND M !!! We find it extremely concerning that these are not included. Perhaps these are so weak that they have been intentionally hidden. As you can see from the note below there was a promise to share the results of the traffic modelling - this has NOT BEEN DONE.

LINSIG/VISSIM Assessment (section from previous proposal)

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

- It is impossible and unfair to expect to comment on these models and their results. This Association has traffic simulation experts who understand these models and their assumptions. In the past attempts to model and simulate HC have been extremely poor and misleading. It is therefore not enough to say that these will be done later. Both need to be scrutinised in this process. Observation - This makes it extremely difficult to work on as the models are not complete or reported on.

It is concerning that the VISSIM model only appears to address the manual count peak (on a Thursday am and a Saturday pm). "A VISSIM microsimulation model has been built, calibrated and validated to represent the traffic conditions recorded during the traffic surveys (12th January 2017)." The VISSIM model covers two hours in the AM peak and two hours in the PM peak (8.7.1). There is no sensitivity analysis here. It again seems to assume that output roads never block. It is impossible to tell as the model report is not included as noted above.

Noise Pollution

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

Local facilities

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

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

LONDON UNDERGROUND

No comment

NATS (SAFEGUARDING)

No safeguarding objections.

CADENT GAS LTD

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

TRANSPORT FOR LONDON TfL Engineering

London Underground Infrastructure Protection has no comment to make on this planning application

MET POLICE Designing Out Crime Group (DOCG)

I have met the applicant and reviewed the proposal. I have provided him with guidance and advice as to what would be required to achieve Secured By Design accreditation, which is achievable. I request that if approved the following condition is applied to the development: (1) Prior to carrying out above grade works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve full Secured by Design Accreditation. The development shall only be carried out in accordance with the approved details. (2) Prior to the first occupation of each building or part of a building or use, a Secured by Design accreditation shall be obtained for such building or part of such building or use. This will ensure the building has the minimum recommended resilience to crime and anti social behaviour issues that it will face for this area. If further justification is required please contact me again. Regards Rob Palin Design Out Crime Officer Metropolitan Police

ENVIRONMENT AGENCY

Chased 19/12/19

NATURAL ENGLAND

Natural England has no comments to make on this application.

HISTORIC ENGLAND The Greater London Archaeological Advisory Service (GLAAS)

The Greater London Archaeological Advisory Service (GLAAS) provided the following repose:

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

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

The planning application lies in an area of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public

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

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation.

However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

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

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

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

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

Informative

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

I envisage that the archaeological fieldwork would comprise the following:

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

Evaluation

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

The first stage of the condition would involve trial trenching with further investigation in stage 2 if significant remains are found.

This response only relates to archaeology. You should also consult Historic England's Development Management on statutory matters.

Internal Consultees

PLANNING POLICY

Principle of Development

An Inspector's Report has been received on the emerging Local Plan: Part 2 (2019) which confirms that emerging Policy SA 14 is sound and can be adopted in line with the modifications proposed as part of the March to May 2019 consultation. In line with Paragraph 48 of the National Planning Policy Framework (2019), substantial weight may be attached to emerging Policy SA 14.

The principle of redeveloping the site for a new residential led-mixed use scheme is deemed to be consistent with emerging Local Plan: Part 2 (2019) Policy SA 14. The land use classes outlined as flexible commercial space (B1/A1/A3/D1) are consistent with the allocation and their quantum is deemed to be consistent with the site's location within the North Hillingdon Local Centre.

Housing Mix

The scheme is proposing 514 new homes with the following breakdown by size:

221 (43%) 1 Bedroom Units

216 (42%) 2 Bedroom Units

77 (15%) 3 Bedroom Units

Adopted Local Plan: Part 2 (2012) Policy H4 outlines that a mix of housing units of different sizes should be provided in schemes, including a preference for predominantly one and two bedroom developments within town centres.

However, emerging Local Plan: Part 2 (2019) Policy DMH 2 proposes to alter this approach so that new schemes are required to provide the mix of housing units to reflect the Council's latest information on housing need specifically. The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3 bedroom properties. Applicants proposing residential schemes will be required to demonstrate that this need has been taken into account and provide a mix of housing units on site, in line with emerging Policy DMH 2.

Noting that the scheme is within the North Hillingdon Local Centre, as well as on a site with a PTAL rating of 3 and less than 200m from Hillingdon Tube Station, the application for just 77 (15%) 3 bedroom units is considered to be consistent with Policy H4. However it should be noted that any subsequent applications to reduce this proportion would likely be assessed against a new adopted policy framework and a reduction in family sized accommodation (>3 Bedroom) would not be supported.

Ickenham Neighbourhood Forum (INF)

The formation of the Ickenham Neighbourhood Forum (INF) was approved by Cabinet on 15th December 2016.

The Council were informed at a meeting on 12th November 2019 that the INF were still interested in

submitting a Neighbourhood Plan and were in the process of preparing a draft for consultation. The Council had not been informed about the publication of a draft Ickenham Neighbourhood Plan at the time of writing (11th February 2020). Therefore there is not a published draft neighbourhood plan that the local planning authority could attach weight to.

The INF was consulted as part of this application. No Comments were received.

ECOLOGY

I have no objections to the proposed development subject to two pre-commencement conditions and an offsite contribution for land to the east.

The ecological assessment provides an appropriate assessment of the site with regard to most species, although more work is required in relation to bats. The assessment has identified that the site, although a former developed site, has been colonised by a range of habitat types that renders the site of biodiversity value. In particular, the site is likely support a small slow worm population as well as being beneficial for amphibians, invertebrates and mammals. The unused nature of the site has a high quality habitat that connects with the land to the east which is designated as a site of importance for nature conservation (SINC) (Borough Grade 1). In turn this SINC connects further northwards to the highly valuable Ickenham Marshes. The A40 provides a significant barrier for various species including reptiles and amphibians but far less so for winged animals. Consequently, this network is a rich and highly valued ecological corridor in an otherwise urbanised area.

The site also has a series of scattered trees which for the most part appear to have been assessed although it is not clear whether the tree belt to the north has been surveyed which is a concern as a large number of mature trees in this area will be lost to the development. The proposed development will effectively remove the majority of the important wildlife habitat on the site, reduce the opportunities for slow worm (protected species), remove a large amount of trees and ideal invertebrate habitat; ultimately the proposal would result in a net biodiversity and is therefore contrary to policy as presented.

However, the site is allocated for development and previous proposals have secured solutions to the net ecological reduction through works and contributions to the neighbouring land to the east. The only way this development could be policy compliant is for 1) a suitable clearance of the site that manages the ecological value prior to any clearance and 2) a contribution to an offsite solution that allows for translocation of species and mitigation for the onsite impacts.

1 - Suitable approach to clearance and pre-commencement works The site is known to support a population of slow worm which is a protected species under the Wildlife and Countryside Act. No clearance work should start until full plans are in place to manage the species. The ecology assessment states:

A reptile mitigation strategy will be required and implemented prior to development works commencing at the Site. In line with English Nature (2004) guidance and current best practise (Natural England, 2015), the aims of the mitigation strategy must be to:

- Protect reptiles from any harm that might arise during the development work;
- Ensure that sufficient quality, quantity and connectivity of habitat is provided to accommodate the existing reptile population;
- Ensure no net loss of local reptile conservation status.

This approach is supported and needs to be secured through the following condition

Condition

Prior to commencement of development, a scheme for the protection of reptiles shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide full details of the likely impacts to reptiles and the proposed measures to secure the protection and conservation of reptiles. The scheme shall demonstrate how reptiles will be accommodated onsite or offsite before, during and after construction as well as proposals for translocation offsite if necessary. No works, including site clearance, must commence until the scheme has been fully agreed and the measures for protection secured and implemented where necessary. The development must then proceed in accordance with the mitigation strategy.

Reason

To ensure the protection of reptiles in accordance with EM7 of the Local Plan.

Condition

Prior to the commencement of development an updated bat scoping study shall be submitted for the whole site (including the tree belt on the northern part of the site). The study shall include recommendations for any further surveys and submitted to and approved in writing by the Local Planning Authority. If the study recommends further surveys, then these will need to be carried out prior to any clearance work unless agreed otherwise in writing with the Local Planning Authority; the results of the further surveys shall be submitted to and agreed in writing with the Local Planning Authority. The development must proceed in accordance with the studies and surveys and include any recommended mitigation as deemed necessary unless otherwise agreed in writing with the Local Planning Authority.

Reason

To secure up to date information on the importance of the site for bats to mitigate any impacts in accordance with EM7 of the Local Plan.

2 - Offsite Contribution

The net loss in biodiversity must be offset through a contribution to the Council for works to the Site of Importance of Nature Conservation (Borough Grade 1) to the east. More is known of the site in terms of ecology than the previous approved offsite plans for example in relation to slow worms and the need for further tree planting (air quality, ecology and landscape reasons).

Consequently, for the development to be policy compliant the developer must include a suitable contribution to the offsite plans for landscaping and public park works that cover the ecological mitigation. The sum needs to be discussed and agreed with the applicant having considered the aspirations for the wider park area.

ENERGY

I have no objections to the proposed development subject to one condition and an offsite contribution. The condition is necessary to secure further details regarding the energy strategy, and the offsite contribution is necessary to make the development policy compliant (i.e. zero carbon).

Condition

Prior to above ground works, full details of the low and zero carbon energy technologies as proposed in the energy assessment (Cudd Bentley, JR/5550/17) shall be submitted to and approved in writing by the Local Planning Authority. The details shall include full specifications of the technology and equipment to be used, their location on the site, and how they meet the energy and co2 reduction targets identified in the energy assessment. The details shall also include noise assessments for the air source heat pumps, roof and elevation plans for the PVs (as well as fixing

mechanisms and sunlight assessment), and maintenance schedules for both technologies. Finally the details shall also include proposals to monitor performance of the technology and how this will be reported to the Council on an annual basis. The development must proceed in accordance with the approved details and technology must deliver the agreed CO2 reduction targets.

Reason

To ensure the development contributes to a reduction in CO2 in accordance with Policy 5.2 of the London Plan.

In addition, the energy assessment identifies a significant shortfall from the zero carbon target required by the London Plan. The shortfall amounts to 325.75 tCO2. Consequently, the S106 must include a carbon offsite contribution of £586,422, payable to the London Borough of Hillingdon in accordance with policy 5.2e of the London Plan.

FLOOD RISK TEAM

1 Summary of Comments

While the applicant has submitted a Flood Risk Assessment and Surface Water Management Report to accompany the application, there are aspects that are not acceptable to the Council as Lead Local Flood Authority. These include the calculated greenfield runoff rate and subsequent proposed discharge rate from the site, the location of the proposed discharge form the site and the lack of information about the sustainable reuse of water. Further details on each aspect are provided below.

2 Reason for Refusal (if objecting)

In the absence of an adequate surface water management report, the application has failed to demonstrate that this development incorporates a sustainable method of managing water that controls the risk of flooding elsewhere and promotes the sustainable reuse of water. The proposal is therefore contrary to Policies EM1 and EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), DME1 9 and 10 in emerging Local Plan Part 2 Development Management Policies (with main modifications March 2019), Policies 5.13 and 5.15 of The London Plan (2016), the

National Planning Policy Framework (February 2019) and the Planning Practice Guidance (March 2014).

3 Observations

Flood Risk

The site is approximately 2.53 hectares in area and lies in Flood Zone 1. A Flood Risk Assessment (ICIS Design Limited report revision C dated September 2019) has been submitted to support the application.

The Flood Risk Assessment states that there nearest watercourse is the Yeading Brook 650m to the east of the site, however, there is an ordinary watercourse from the pond in Freezeland Covert approximately 320m to the east of the site. This watercourse discharges into the Yeading Brook to the east.

There are parts of the site that are identified to be at low risk of surface water flooding (1% annual exceedance probability to 0.1% annual exceedance probability)

with a small area at medium risk of surface water flooding (3.33% annual exceedance probability to 1% annual exceedance probability), however this is related to changes to ground levels associated with the previous use on the site. This is consistent with the topographic survey contained in the Surface Water Management Report. While the proposed drainage strategy is likely to minimise flooding from this source on the site, the low risk demonstrates the need to consider exceedance flow routes in the drainage strategy.

The submitted Flood Risk Assessment is proportionate to the level of risk on the site and is in line with local, regional and national planning policies.

Surface Water Management

A Surface Water Management Report (ICIS Design Limited report revision D Dated September 2019) has been submitted to support the application.

It is welcomed that there is an increased proportion of green infrastructure within the proposed drainage strategy, through the use of rain gardens, swales and green roofs. There are further opportunities to align the landscaping with the surface water drainage network.

The Council has concerns over some fundamental aspects of the proposed drainage strategy and cannot therefore recommend that the application be approved based on the information provided. While the detailed design of certain elements of the drainage system can be secured post-planning by way of a condition, these aspects have the potential to affect the layout of the development and therefore cannot be secured by condition.

Discharge Rate

The primary concern is the proposed discharge rate from the development. The Surface Water Management Report has calculated the greenfield rate of runoff to be 11.7l/s using FEH Methods. This is over 3.5 times the initial greenfield rate runoff previously calculated for the site in 2017 using FSR methods (3.17l/s in 2017 report). While previous discussions between Council officers and the applicant recommended the calculation of greenfield runoff rates using FEH methods, the rate was never agreed and was at one stage as high as 12.5l/s. The calculation appears to have used an urban extent factor in calculating QMED is quoted as QMEDurban.

QMED should be calculated without any accounting for the urban extent of the surrounding catchment and should be based on an entirely rural catchment. The information provided in Appendix E suggests that the true greenfield QMED rate is likely to be closer to 7.6l/s than 11.7l/s. The agreed rate or runoff is therefore expected to be lower, which in turn will affect the scale of attenuation required on the site. As a result, there is no guarantee that the quantum of attenuation required can be accommodated within the current site layout.

The applicant has also not included the London Borough of Hillingdon Proforma in either the Flood Risk Assessment or Surface Water Management Report to clearly demonstrate that the proposals meet local, regional and national planning policies.

Discharge Location

The proposed drainage strategy is to attenuate surface water flows and create a new connection to the Thames Water surface water sewer in Freezeland Way. As stated in the Surface Water Management Report, a connection to the surface water sewer is lower down the drainage hierarchy than infiltration or a connection to a watercourse.

The Drainage Strategy has considered the SuDS hierarchy and has discounted the potential to drain via infiltration or to a watercourse. While the likelihood to discharge all collected surface water to the ground via infiltration is low, the possibility for partial infiltration should be retained as a consideration to detailed design to maximise the opportunities to reduce the volume of surface water entering the sewer network.

The Surface Water Management Report excluded the potential to connect to a watercourse despite there being the potential to connect to an ordinary watercourse in Freezeland Covert to the east of the site that discharges into the Ickenham Stream/Yeading Brook further east. This could be secured by the creation of an open channel as part of any negotiated green space improvements on the Council owned land to the east of the development. It is advised that discussions are held with

Flood and Water Management Officers alongside Green Spaces colleagues to determine the suitability of this work and the scale of any contribution required.

The current strategy is to discharge collected surface water to the Thames Water surface water sewer in Freezeland Way to the south of the site. There are known surface water flooding issues in the catchment area that drains to this sewer, and previous concerns have been raised regarding a connection from the site into this sewer. As the proposed rate of runoff is greater than that which would be acceptable to Thames Water 5l/s/ha., as well as greater than a rate that would be acceptable to the Council due to discrepancies in the calculation methodology, the proposed strategy is not in line with local planning policies.

Water Reuse

The Surface Water Management Report has not adequately considered the potential for water reuse within the site in line with local and regional planning policies. The Sustainability Statement submitted only allows for flow control devices on appliances and does not include any information on rainwater or greywater harvesting. Policy EM1 of the Hillingdon Local Plan Part 1 requires major developments to consider the whole water cycle impact of the proposals, including water consumption. Further, Local Plan Part 2 Policy DME1 10 (G) requires all new development proposals to include the collection and reuse of rainwater. The current proposals are therefore not in line with local planning policy.

WASTE TEAM

The proposed bin stores are suitable for the storage and collection of household waste and recycling. Both general waste and recycling will be collected weekly from the development. The application states that collections will happen during off-peak hours but this is not a policy which Hillingdon adopts. Collections may take place any time between 6am and 5pm on weekdays with occasional weekend collections. The site should allocate a suitable area for the storage and collection of bulky waste such as furniture. The plan does not account for the storage of waste arising from the commercial units. The applicant needs to clarify this, ensuring that commercial waste (including that generated by on site staff), is stored and collected separately from household waste.

In response to the above comments further plans and clarification was submitted by the Applicant and the following further response was provided by the Waste Team:

I'm happy with their responses thank you. Please can a condition be placed on the commercial units that a waste management plan must be submitted which ensures that the waste is stored suitably and managed separately to residential waste. Please note that some of the units are further than 10 metres (max acceptable pull distance) from the road and therefore, this may require external bin stores to be built.

I've noticed that a couple of the bin store doors open inwards, this can make it difficult to access the bins and therefore doors usually open outwards. We'll still collect if they open inwards, but worth letting them know as a suggestion to prevent damage etc.

HOUSING SERVICES

No comment

URBAN DESIGN AND CONSERVATION

The site forms an "island" and is bounded on three sides by roads. Long Lane lies to the west and rises up towards the station; the A40 runs to the immediate north and lies at a lower level than the site and Freezeland Way, a busy slip road off the A40, runs west towards Hillingdon Circus. The site

is separated from the latter by a wide area of rough grass and trees , and to the east is an open green space designated as Green Belt. To the north beyond the A40 there is also an extensive area of Green Belt and this area includes the setting of some important historic sites, such as Ickenham Manor and Swakeleys House. These areas are sensitive in terms of views to and from the site and its hinterland has a strong "Metroland" suburban character, particularly in terms of its layout, and the scale and massing of the surrounding buildings.

The application seeks planning permission to construct a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.

Prior to the submission of this current application a pre-application (4266/PRC/2019/144) request had been made to the council seeking advice on the proposals. This current scheme was submitted at the same time the pre-application advice was provided and therefore the scheme has not taken into consideration or addressed any of the Urban Design concerns or properly considered the setting of heritage assets.

There have been a number of applications for the redevelopment of this site in the past the most relevant being 4266/APP/2014/518 (Mixed use redevelopment comprising the erection of a foodstore, measuring 3,543 sq.m (GIA) (Use Class A1) (inclusive of delivery and back of house areas) with 179 car parking spaces and 32 cycle spaces; 3 retail units totaling 1,037 sq.m (GIA) (Use Class A1 to A5); a 6 storey (plus plant level) 70 bed hotel (Use Class C1), with associated car parking and cycle spaces; together with highways alterations and landscape improvements) and 4266/APP/2014/519 (Erection of 125 residential units (Use Class C3) with 100 car parking spaces and 138 cycle parking spaces and associated highways alterations together with landscape improvements (Outline Application with details of appearance reserved).

The August 2014 scheme that the planning committee resolved to grant planning permission (subject to S106) for a lower rise scheme of 4 to 5 storeys, with a taller focal element of a 6 storey at Hillingdon Circus, is already considered a dense form of development for the site. The spacing between the blocks was more in proportion to the heights, and the relationship to the Green Belt is at the uppermost limits. The proposed 2 to 11 (mainly 5-11) storeys greatly exceeds the height, scale and massing of the 2014 scheme, which is of serious concern as the impact of development is overbearing and incongruent with its townscape surroundings and landscape setting.

The scheme proposes a 315m continuous 'wall' of development along the perimeter to the north and west that wraps around the site from the A40 to Long Lane. This continuous ribbon of development, comprises of the taller buildings of the proposed development, with no 'breaks' in order to maintain the seal against the A40 and Long Lane.

It is noted that the finger form blocks along the northern edge have been connected at the north end and the upper-level connecting units are 5 storeys, to allow for a varied roof line. The heights of the outer buildings vary from 5 to 8 storeys with a single 11 storey building at the north west corner of the site. A 7/8 storey 'entrance' building is located at the south west corner. The inner courtyard buildings are between 4 to 7 storeys in height.

Notwithstanding the variation of roof heights, it is considered that cumulatively, the outer walls of the development would rise up dramatically above the existing buildings on the south side of Hillingdon Circus to the extent that they would appear completely out of scale and overbearing. The presence of the 11 storey tower block, contributes to a development that would completely overwhelm its immediate surroundings and would not respect the suburban grain, height, bulk and massing of the

surrounding well established buildings.

Due to the juxtaposition in scale between the proposed 2 to 11 (predominately 5-11) storeys and existing 2 to 3 storey suburban context, the proposed development will be considered as a series of 'tall buildings'. Policy and the supporting Townscape Study evidence base has clearly identified areas of Uxbridge and Hayes as the only suitable areas for tall buildings within the Borough. This site is not Uxbridge or Hayes. Plus there are prevailing sensitive contextual constraints in the form of green Belt, historic assets and a strong 'Metroland' setting. Therefore, the disproportionate scale of proposed tall development is clearly unsuitable for the proposed location.

In longer distance views the development would break the skyline where at present there are views of Harrow. Its presence would mar the skyline and be intrusive where uninterrupted views are less common and more valued. The existing long unhindered views in this location would now be severely impacted and intruded upon.

The size of the development and its unrelieved northern and western facades, positioned relatively close to the site boundary's and relative to the footpath along Long Lane, compounds the scale of the development and the potential harsh canyon like pedestrian environment at ground level.

The August 2017 refused application 4266/APP/2017/3183 included a small number of TVIA verified views which confirmed the harmful impact of a scheme that was four to nine storeys in height. The new proposals will exacerbate the harm of this previous scheme by introducing building heights of predominantly 5 to 11 storeys in height. It is a concern that the current Townscape & Visual Impact Assessment does not include verified views to show the full impact of the proposals on the surrounding area and there is no evidence to suggest that an assessment was even undertaken prior to the submission of this formal application.

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

The severe jump in scale from suburban to urban is too immediate and lacks any architectural transition to soften the scale change. Therefore the impact is considered to be a brutal and harmful intervention into the prevailing Metroland character area and dominant green Belt landscape setting and the setting of surrounding historic assets such as Ickenham Manor.

An addendum to the TVIA was submitted in December 2019. As a result a further site visit was carried out and the following comments were made by the Urban Design and Conservation Team:

There is a hedgerow / treeline that runs along the southern curtilage boundary of the listed building. Currently there would be glimpse views from the property through the boundary due to the lack of foliage during the winter months. The proposal will therefore have some negative impact on the setting of the grade I listed house. This could be made worse if the foliage was ever to be removed, reduced or thinned out. Ickenham Manor has always had a rural setting and the southerly views from the house and surrounding curtilage help to reinforce this important character as they overlook surrounding farmland which is enclosed with verdant hedge and tree lines. The southerly views from Ickenham Manor would therefore be harmed by the construction of the proposed development which would extend up above the tree line on the horizon. The harm to the setting of the grade I listed building would be considered less than substantial. The impact would be reduced during the spring / summer months when the trees along the southern curtilage assuming they are not removed.

I have also looked at the other views within the TVIA.

With respect to the Ickenham Conservation Area views 10 and 11 demonstrate that the new development would be seen in views looking towards the site. The proposed development would extend up above and visually infill gaps between houses. Although the views of the TVIA are static it would appear that the development would likely to be visible in a number of kinetic views as one moves through the conservation area as well as from the windows of houses and from rear gardens. One of the strong characteristics of the conservation area is the uninterrupted skyline of hipped roofs and the softening effects of street and privately owned trees. The enjoyment of this roofscape is likely to be affected and as a consequence there will be harm to the setting of the conservation area. The harm would be considered less than substantial.

Many of the other views in the TVIA illustrate the developments impact on the townscape and confirm that it would be a discordant and incongruous development within this modest suburban setting of buildings of two and three storeys in height.

The longer distance views also demonstrate harm. In particular views 13 and 15 show the development extending up prominently above the tree line whereas the existing established development of the surrounding area is kept well below the treeline which retains a largely uninterrupted skyline of tree canopies which make a positive contribution to the area.

The proposed development has a coarse grain comprising large flat blocks which are at odds with the surrounding townscape which has a much finer grain of modest 2 and 3 storey houses and shops which create a strong suburban character with open space.

Notwithstanding the objections already raised to the inappropriateness of the development's height, bulk and mass to the suburban character of the area, the layout of the buildings and separation distances between the blocks appear to be acceptable on a scheme of this size but as stated previously would be more appropriate in an urban setting with development of a similar height, bulk and mass rather than this suburban setting adjacent to the green belt.

The proposed roof forms comprise flat roofs with parapets, gable ends, mansard elements and set back storeys to provide visual interest. The parapet roofs and gable ends loosely reflect the established roofscape, albeit on a much larger scale, but the introduction of mansard roofs with sheet cladding would be incongruous. These elements would be particularly prominent given the proposed height of the buildings and would draw undue attention and detract from the area.

Notwithstanding the concerns of the height bulk and mass of the development. The detailed design of the facades (see also comments with respect to materials) is generally considered acceptable and well considered. There are some reservations with respect to the rounded arches to the ground floor of the 'Focal Building' to Hillingdon Circus which does not sit comfortably with the architectural language of the floors above.

The development proposes streets and public spaces that are well planted and incorporate a hierarchy of materials for the hard landscaping with shared surfaces which would be complementary and appropriate for the site.

The proposed construction materials for the majority of the blocks have contrasting brickwork with bands of reconstituted stone to accentuate different parts of the facade and is considered acceptable in principle. This would be dependent on appropriate brick, bonding, mortar and stone being chosen to respect the local palette of materials. There are concerns with the use of a green brick to the Park Pavilions as the visualisations suggest that this would be glazed brick. This could draw undue attention and appear incongruous within this sensitive location close to the green belt and would be in stark contrast to the more traditional palette of materials of the established suburban development in the area.

Internal Consultees (Additional)

HIGHWAYS TEAM

Site Characteristics and Planning History

This vacant Brownfield site in Ickenham was originally occupied by the Master Brewer (MB) Motel and Public house which consisted of 106 bedrooms, conferencing and restaurant facilities with parking for over 200 vehicles. The site is situated on the north-eastern segment of the major 'Hillingdon Circus' signalised junction and fronts directly onto Freezeland Way. It is bounded by A437 Long Lane (north) and Freezeland Way which is a continuation of the A40 Western Avenue exit slip road.

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

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

More recently, on the 19th February 2019 the Majors Planning committee refused an application for 437 residential units with 219 on-plot parking spaces with nominal retail and commercial provision (4266/APP/2017/3183). There were 10 reasons for refusal which included reasons 2 & 3 which cited insufficient on-plot parking provision and excessive traffic generation respectively.

It is now proposed to provide 514 residential units with nominal retail/commercial provisions and a total of 164 on-plot parking spaces consisting of 154 residential, 6 visitor and 4 car club spaces distributed within each of the 8 proposed podium levels and also including on-street locations.

Parking Provisions - C3 Residential

The 514 residential unit component of the application consists of the following:-

221 - 1 bedroom flats

216 - 2 bedroom flats

77 - 3 bedroom flats

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

A total of 154 on-plot residential spaces are proposed which equates to a ratio of between 0.3-0.36 spaces per dwelling. They are to be arranged at surface and podium levels central to and across the site.

It is acknowledged that the Greater London Authority (GLA) have accepted a ratio ranging from approximately 0.3-0.36 per flatted unit within their pre-application response dated 22nd July 2019. However this unprecedented low parking ratio would normally be considered for areas akin to more sustainable main or 'edge of' town centre locations which are better placed to accommodate such a lower level of provision.

Utilising the Hillingdon saved UDP standard, the recommended maximum quantum would be in the region of 771 spaces and 591 spaces when applying the emerging Local Plan Part 2 standard. However in the spirit of compromise between the regional and local parking standards and LBH advice afforded at the pre-application stages for the aforementioned prior applications including the current iteration, encouraged a 1:1 parking ratio per unit which would equate to 514 spaces. This would assist in limiting undue and detrimental parking displacement onto the local highway network.

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

Notwithstanding the above and as highlighted earlier, the need to encourage sustainable modal travel choice is acknowledged on a local, regional and national level hence in the spirit of compromise between the regional London Plan and local Hillingdon parking standards, an on-plot parking ratio between 0.75-1 space per dwelling in lieu of the proposed average 0.3 per unit ratio would be favoured. This would then equate to approximately 385 - 514 residential spaces instead of the 154 proposed. This compromise is substantively below Hillingdon's maximum adopted standard requirement of a 1.5 per unit ratio which would demand 771 spaces and 591 when considering the emerging Local Plan Part 2 standard.

When contextualising all of the above, a level of on-plot car parking provision for this site between 385 (minimum) and 514 spaces would be considered appropriate and is therefore recommended. As a consequence the proposed total quantum of 164 spaces (including residential, disabled compliant, visitor and car club provisions) is considered unacceptable as there would be a heightened potential for detrimental parking displacement onto the highway network.

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

Car Club Facility

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

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

Electric Vehicle Charging Points (EVCP's)

Based on the proposed site parking quantum, the parking requirement for EVCP's in line with London Plan 2016 (LP 2016) draft Policy T6.1 for this C3 use would equate to 33 EVCPs (20%) for 'active provision' with the remaining spaces (131) acting as 'passive' provision for future activation. These would be monitored and controlled within a parking management strategy (PMS) regime (to be discussed later). This arrangement is considered acceptable within the above context.

Disabled Parking

It is proposed to provide 16 disabled compliant parking spaces distributed within each podium level and on-street which is in line with the draft London Plan Policy T6.1 which requires 1 space per 3% of dwelling units. Thereafter a demand led approach is applied which is capped at a level of 10% of the total number of residential units. The 'initial' provision is therefore welcomed and considered acceptable in number and layout terms.

Cycle Parking

In line with draft London Plan standards, there would be a provision of 918 secure and accessible spaces in total for residents and visitors located throughout the site, including within a 'cycle hub,' which is acceptable in format and design layout terms and the quantum conforms to and exceeds Hillingdon's saved UDP standard which would require a figure in the region of approximately 500 spaces.

Notwithstanding the above, the indicated provision of 918 is considered excessive as it is a demonstrated fact that the vast majority of larger new developments in Hillingdon do not fully utilise cycle provisions which results in large numbers of spaces remaining empty and occupying areas which could be better used for amenity or other more useful purposes. A reversion toward the saved UDP standard would therefore be considered more prudent in this regard. The underuse can also be explained by the borough's Outer London status and the travel challenges that this brings for residents who are therefore reliant, more so, on the private motor car in lieu of cycling as confirmed by census data (2011) which indicates that Hillingdon exhibits one of the highest car ownership rates per household in London.

Motorcycle/Scooter (M/S) Parking

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

Consequently there should be 8 such spaces provided in total for the site as a whole. 13 suitably located areas are proposed which therefore exceeds the standard and is therefore welcomed.

Parking Provisions - Flexible Commercial Units (Use Class B1/A1/A3/D1)

The applicant is proposing a zero parking provision for the flexible commercial elements which would total an overall scale of 1214 sqm GIFA. In accord with the LBH saved UDP standard, a quantum of up to 24 spaces (or 48 spaces in line with the emerging Local Plan Part 2 Development Plan) would normally be required for this level of scale with a suitably apportioned GIFA. It is reasoned that to justify a 'car free' status for the use, demand will be very local to the development and public transport/pedestrian based which includes patronage by new occupiers of the address. Hence car borne demand is predicted to be relatively low to non-existent. On this premise there would be no parking provision for the 'commercial' component.

This would in theory leave 6 generic visitor spaces which are dedicated more so to visitors affiliated to residents. However if vacant could be part utilised by 'commercial' patrons as and when. Clearly this would need to be managed accordingly hence the practical 'day to day' operation of the bays would be controlled under the proposed parking management strategy (PMS - to be discussed later).

As is it unlikely that the commercial element would attract measurable extraneous custom due to its insular siting within the development which inherently discourages pass-by or pass-through traffic, the absence of parking provision for this element is considered appropriate given this context.

Cycle Parking

In line with draft London Plan standards, there would be a provision of 8 long stay & 32 short stay spaces for the 'flexible' B1/A1/A3/B1 uses. This totals 40 spaces which is considered acceptable albeit marginally below Hillingdon's minimum cycle parking standard. All are presented secure and accessible in design layout terms and are conveniently located throughout the site for residents and visitors to use.

Parking Management/Allocation Strategy (PMS)

On the premise of best controlling the mixed use profile of parking usage within the site which includes new residential and flexible commercial provisions, it is considered that the application of PMS is a key tool which helps to ensure an unhindered and functional operation for all the parking uses within the site envelope. This involves creating an internal site management regime that would enforce and oversee overall parking control on a site wide basis thus ensuring the harmonious and mutual coexistence/interplay of parking bay allocations for new residents and their visitors including any minimal demand imposed by the commercial component of the development. The PMS can be supported by enforcement structures which encourage the correct use of parking places which assists in ensuring that parking demand and allocation is properly managed. The PMS should also set out the methodology behind the allocation/control of parking places for the dominant residential and less so commercial element.

The applicant has indicated that an internal residents parking scheme would be the enforcement tool that would be applied to control and regulate the on-site parking mix. They also state that 'key fob' operation could be applied as a method of entry into both the main surface level and podium car parks within the site envelope which would then be managed accordingly. The site area would potentially be separated into several parking zones which will require the purchase of a parking permit by new residents. The scheme would involve a private parking enforcement company who would administer the scheme and monitoring would be undertaken at intervals of six months for two years after scheme implementation in order to determine the effectiveness and consequences of the enforcement regime. Such monitoring would be applied within (and external to) the site in order to decipher whether any detrimental displacement impacts have been inflicted internally or specifically on surrounding public highway.

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

Traffic Impact Assessment (TIA) Methodology

Two 'industry recognised' traffic assessment tools were applied to the recently refused 2017 application (19th February 2019) for 437 units and have also been utilised to analyse the local and wider impacts of this current proposal. In accord with TfL advice, fresh traffic surveys have been undertaken in September 2019 in order to determine whether there has been any measurable change in base-line traffic flows which may require a re-run of the modelling process (to be discussed later in this appraisal). The findings suggest that an overall reduction in traffic flows in the area which has negated a re-modelled exercise. Using the 2017 surveyed and modelling data, analysis has been centred on the 'Hillingdon Circus' junction and combined with extant committed developments in the relative locality. LinSig (traffic signal analysis) & VISSIM (traffic flow simulation) modelling have therefore been applied for this purpose. In order to apply these tools, certain

assumptions and parameters have been established and they are compiled below. The methodology and outcomes have been independently validated against the 2017 highway network, observed demand and network performance and are supported by Transport for London (TfL).

Traffic Growth

Comparative and thorough local traffic surveys were undertaken in 2017 & then in 2019. The former exercise indicates a similarity with previous surveys dating back to 2010 undertaken for a prior application for the site whilst this year's surveys appear to indicate a measurable fall in traffic activity. In general terms indicative traffic growth in many areas of London has in fact plateaued over recent years with a maximum growth potential, at certain locations, not exceeding 1% with many areas exhibiting no notable growth whatsoever. In 2017 the applicant has therefore assumed zero growth to this point whilst now in 2019 suggests, for an example, an hourly reduction in traffic flows ranging from 11% in the am peak and 9% in the pm peak hour at the Hillingdon Circus signalled junction. This apparent drop in flows is questioned as the results significantly reverse the growth trend which does correspond with 'year on' increases exhibited elsewhere in Greater London.

An explanation with regard to this apparent drop in surveyed activity is possibly down to certain influencing factors in that traffic surveys can display considerable variance from 'day to day' as extraneous factors such as congestion, drivers tolerance to delays/congestion, inclement/adverse weather conditions, sustainable modal shift, origin and destination of trips i.e. linked trips etc affect representative data. Such parameters will also change dynamically from day to day which further disfavours an accurate representation of recorded traffic flows.

Notwithstanding this point, for robustness the applicant has utilised the higher 2017 'zero growth' figures as for the previous application. As was the case then, it is considered that, at the very least, a TEMPRO growth factor which is the industry recognised method of analysing 'year on year' traffic growth in order to ascertain best-guess estimates of future travel demand should have been applied to provide a more accurate TIA.

Committed Development

The 3 main substantive development sites (with a more recent smaller 2019 consent for 36 residential units - see D below) which may, in conjunction with the proposed new development, impact cumulatively on the highway network capacity were included within the modelling exercise for previously submitted application for 437 units and are listed as follows:-

- A) RAF Uxbridge - Residential-led mixed use.
- B) Housing and Retirement village in West Ruislip.
- C) Abbotsfield & Swakeleys School - Merger & Expansion.
- D) Former dairy depot, 297 Long Lane - Residential use

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

Traffic Modelling Outcomes

In traffic capacity terms, the current baseline scenario indicates that the Hillingdon Circus signalled junction operates at and above capacity, both in the am and pm peaks thus creating undue traffic queuing and resultant congestion at the junction and surrounding road network. The proposal combined with the aforementioned committed developments would clearly exacerbate this position creating a scenario whereby the junction could potentially be inflicted with traffic levels well above

operational capacity resulting in greater vehicle queue lengths and associated delays which understandably raises concern.

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

It is noted that since the modelling exercise has been undertaken in 2017 for the refused application for 437 residential units there have been further developments with regard to up and coming HS2 Ltd related construction activities to the north of the site and specifically related to new tunnel portal construction adjacent to Ruislip Golf course in Ickenham Road. These works would result in Hillingdon Circus being utilised as part of the main A40 Haulage Route hence imposing additional traffic burden. At the time of the original modelling exercise, no firm detail was available regarding likely HGV movements generated by the construction however some evidence has been produced by the applicant which indicates that during months of construction commencing from autumn 2020, approximately 18 HGV's would traverse through Hillingdon circus on a daily basis with an imposition of 3 vehicles during the am & pm peak hours. Although it is anticipated that there will be peaks and troughs in HS2 linked construction activities, the official estimation by HS2 Ltd of, for example, HGV activity linked only to the new portal at the Ruislip Golf course located further north of the MB site in Ickenham Road is officially anticipated at 120-140 daily two-way trips within HS2's 'main works' Local Traffic Management Plan. A high proportion of these vehicles would route through Hillingdon Circus and as HS2 Ltd cannot guarantee avoidance of peak traffic periods this would infer a significant under-estimation by the applicant. General HS2 Ltd activity generated by other work sites in the borough would also add measurable burden to the junction during and outside of peak traffic periods well into the second half of the next decade. It is therefore considered that the 'real world' level of imposition would add significant traffic burden which is especially concerning in the light of the signalled junction running at/beyond working capacity during peaks at present. The applicant has not factored this aspect into their analysis on the premise of identified traffic reduction measured in 2019 which would therefore absorb HS2 Ltd activity. As explained within the 'Traffic Growth' chapter, it is not considered as an acceptable course of analysis.

Vehicular Trip Distribution

As per the previously refused application for 437 units, it is assumed that an even (25%) vehicle trip distribution forecast for site arrivals and departures has been applied to all of the north, east, south and westerly arms of the 'Hillingdon Circus' signalled junction within the modelling exercise. This assumption has previously raised some concern from the Ickenham Residents' Association who cite this percentage assumption to be an 'arbitrary assignment' and unrealistic.

As Members are aware, percentage trip assignment assumptions (based on the total predicted traffic generation) are required for traffic modelling purposes and as such are considered more as predictions rather than 100% accurate representations of actual generated trip movements post development. This 'built-in inaccuracy' is notably due to the difficulty in predicting traffic assignment and distribution which depends on a driver's premeditated decision to drive in the first instance and many other extraneous factors such as congestion, drivers tolerance to delays/congestion, inclement/adverse weather conditions, sustainable modal shift, origin and destination of trips i.e. linked trips etc. Such parameters will also change dynamically from day to day which further disfavours accurate trip generation predictions. On this premise and the given configuration of the highway road network, the 25% 'four-way split' percentage assumption/assignment for site arrivals is considered as realistic and therefore acceptable for modelling purposes. In terms of site

departures, a more reflective figure of 33.3% should ideally be applied based on an equal 'three-way split' imposed on the north, south and west junction arms only. This is due to the 'one-way' nature of the westbound flows on the eastern arm of the junction i.e. Freezeland Way which effectively removes the option of eastbound travel on that arm.

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

Traffic Generation - C3 Residential/Commercial Units (Use Class B1/A1/A3/D1)

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

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

It has been suggested that the 514 residential units would result in a two-way traffic generation of approximately 78 vehicle movements @ the AM peak with a figure of 61 for the PM peak. The commercial together with servicing aspects (commercial & residential) are relatively insignificant generators and as a result marginally increase the above predicted figures to 82 & 67 respectively.

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

It is noted that the above predictions do fully 'factor in' any further potential trip reductions by way of modal shift toward sustainable means of travel resulting from a successful travel plan and PMS strategy discussed elsewhere within this appraisal.

Vehicular Trip Generation (based on 2017 survey data)

On the assumption of a development opening year of 2021/22, a future traffic generation forecast of 5 years post development is proposed and this falls within accepted guidance parameters. The relevant traffic flow figures (measured and predicted) related to the proposal are as follows:-

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

AM(peak) - 3830

PM(peak) - 3708

B) Proposed Development only (v/hr)

AM (peak) - 78 - uplift on total base flows of 2%

PM (peak) - 61 - uplift on total base flows of 2%

C) Committed Development only (v/hr)

M (peak) - 244 - uplift on total base flows of 6% **

PM (peak) - 76 - uplift on total base flows 2%

D) Proposed & Committed Development only

AM (Peak) Proposed = 78 Committed = 244 Total = 322 uplift on total base flows = 8% **

PM(Peak) Proposed = 61 Committed = 76 Total = 137 uplift on total base flows = 4%

** exceeds IHT 5% threshold

In traffic impact terms, the acceptability (or otherwise) of a development proposal is summarised within the 2019 National Planning Policy Guidance (NPPG) - Paragraph No. 109 which states "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". This approach has therefore been applied throughout this chapter.

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

The Chartered Institution of Highways and Transportation (CIHT) (formally IHT) traffic assessment guidelines (circa 1994) trip generation thresholds were traditionally recognised as appropriate guidance which would allow for an informed decision to be made on whether development impacts could be absorbed within existing highway networks with or without highway interventions i.e. mitigations. Threshold triggers of 5 and 10% development traffic uplift were established for congested and other roads respectively to establish whether mitigation measures (if achievable) could enable a proposal to be acceptable on highway grounds if these percentages were exceeded. Although this once ubiquitous method of approach is no longer applied on a widespread basis, it is still considered as a worthwhile measure and guide for gauging the suitability or non-suitability of a proposal on highway traffic generation grounds.

In line with this approach, the 'Development only' predicted uplift on total traffic flows amounts to 2% however table D indicates an overall 8% predicted uplift in the AM peak traffic flows when 'committed developments' are also taken into consideration which notably excludes full imposition by HS2 Ltd construction related activity and any general 'year on year' additional traffic growth. This 'cumulative' figure of 8% greatly exceeds the IHT guideline threshold which, as stated earlier, recommends a figure of up to 5% being an absorbable increase on a congested highway network without measurable detriment and need for mitigation. It is therefore apparent that the Hillingdon Circus signal installation would be overburdened, at peak times, operating at or indeed exceeding practical operational capacity. Further signal optimisation could be sought post-implementation if the proposal receives planning consent however optimisation has taken place in the past hence it is considered that little highway benefit can be achieved by this mechanism at this or any future point with or without redevelopment of the site.

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

Hence although some of the proposed measures are welcomed, it is considered that proposal is still highly likely to have negative impacts upon the public highway. This overall conclusion falls in line with the NPPF paragraph No.109 with specific regard to the appropriateness of refusing development based on the residual cumulative impacts on the road network which, in this case, are considered severe.

The following chapters appraise what has been offered to this authority in terms of mitigation in order to allow the Committee to make an informed decision on the overall proposal.

Development Footfall

It is a normal requirement for this scale of residential development to be accompanied by a

Pedestrian Environment Review System (PERS) audit in order to provide an inventory of local pedestrian facilities thereby allowing an informed determination of the suitability of the local highway network to be made in order to cater for the uplift in foot traffic generated by a proposal. The applicant has not provided this audit however a study was previously submitted for the refused 437 unit scheme which indicated 64/49 additional pedestrian movements are predicted for the am & pm peaks respectively. Clearly with the uplift in unit numbers from 437 to 514 this prediction would increase. However the original numbers were considered as a gross underestimation given that the overall proposal could potentially house somewhere in the region of 1000 new residents. Notwithstanding this point, as is the norm, pedestrian footfall would cumulatively increase and be distributed throughout the day and evening periods so clearly any projected footfall uplift, whether it be at peak or any other time of the day, would impinge on the public realm creating additional demand on the public realm i.e. footway and road crossing infrastructure.

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

Potential Pedestrian Environment & Traffic Enhancements @ Hillingdon Circus

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

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

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

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

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

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

of the junction. Given the already sub-standard scale of the central 'sheep pen' crossing, such an aspiration could only be achieved by acquisition (dedication) of a slither of land on the far western flank of the proposal site envelope (alongside Long Lane) which would thereby maintain road capacity and provide a larger 'sheep pen'.

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

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

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

Public Transport Enhancement / Financial Contribution

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

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

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

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

The other prominent and independent 'Oxford Tube' and X90 bus service is a well used and successful service provision which operates to and from Central London which provides a convenient sustainable transport mode. As outlined within the following synopsis there are improvements proposed to the westbound bus stop on Freezeland Way which entail creating a bus stop lay-by with a new bus shelter as this would assist in improving the usability and accessibility for the newly generated footfall of the development with consequential benefit to existing users.

Synopsis of Highway/ Public Transport - Interventions & Gains

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

1. It is recommended that pedestrian and cycling crossing facilities be further investigated /improved at the Hillingdon Circus signal junction. As discussed in detail earlier within this chapter, this would involve pedestrian island and marginal road widening at the Long Lane (North) 'sheep pen' location with general modernisation across the remaining north, east and southern arms of the junction to enhance facilities for all users including cyclists.
2. An improved and revised westbound right turn filter carriageway lane from Freezeland Way into the service road fronting the site is proposed with the aim of reducing the need for westbound vehicles to navigate through the Hillingdon Circus signal installation in order to enter the site thereby limiting additional capacity burden on this main junction. The filter lane would be achieved by reducing the width of the existing grass verge in the vicinity of the existing right turn facility into the site. This is fully explored within the next chapter under 'Means of access to the site by vehicle'.
3. The entrance to the site at the south-western corner of the site envelope is suggested to form a 'gateway' into the site which would act as an extension and visual enhancement of the public realm situated within an extended site envelope which encroaches onto adopted public highway and Transport for London (TfL) land. This area of adopted land currently exhibits an expanse of relatively bland footway and 'triangular' area of grass verge. The main footways running directly alongside the carriageway would remain as adopted public highway however the remaining area leading towards the site would potentially require the 'stopping up' of public highway under section 247/252 of the T&CPA 1990 to allow for the provision of the 'gateway'. This is considered acceptable in principle as the area of land in question would be subject to betterment in both visual and usability terms by virtue of seamless merging of the public realm with the site itself.
4. In order to cater for this anticipated burden on local services that the additional pedestrian footfall would impose the Council, in tandem with TfL, have required securement of a financial contribution toward providing a new service bus provision amounting to a financial contribution of £75,000 per annum to TfL for a period of 5 years totalling £375,000. This financial contribution will facilitate a new 278 bus service which is proposed to support the new Elizabeth Line services running between Heathrow and Ruislip via Hayes and Hillingdon.
5. Bus priority measures in the form of Selective Vehicle Detection (SVD) at the signal junction would be introduced as described in the previous chapter and financed by a £30,000 contribution.
6. The footway at the existing westbound X90/'Oxford Tube' bus stop along Freezeland Road in proximity of the site would be widened to allow for a suitable bus shelter with necessary kerb adaptation to facilitate lay-by provision and mobility impaired access. This would assist in improving the usability and accessibility for the newly generated footfall of the development with consequential benefit to existing users.

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

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

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

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

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

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

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

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

Appraisal of the Surrounding Road Network and Site Access Infrastructure

Means of access to the site by vehicle

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

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

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

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

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

Means of departure from the site by vehicle

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

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

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

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

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

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

Travel Plan - Residential & Performance Bond Contribution

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

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

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

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

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

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

Specific SMART percentage modal shift targets have been set which is a pre-requisite requirement under TfL guidance. Under the FTP an overall modal shift target for the reduction in single occupancy car travel linked to the site would be in the order of 3 % following the 1st year of monitoring after first residential occupation. At subsequent monitoring years 3 and 5 this figure would equate to 3% and 4% respectively. The total target would therefore amount to a 10% reduction in single occupancy private car travel over 3 years.

To assist in achieving this aim, modal shift targets relating to sustainable travel modes such as walking, cycling, public transport use have broadly indicated an across the board 3% increase over a five year period.

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

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

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

A full and detailed CLP and SDP will be a requirement to be secured under planning condition given the constraints and sensitivities of the local road network. Some detail of the construction programme and methodology has been presented within the TA however both plans will need to be secured under planning condition in order to optimise construction routing thereby avoiding/minimising potential detriment to the highly sensitive surrounding public realm.

Summary Conclusion

The highway/transport related consequences of the residentially dominant 514 residential unit flatted proposal with a commercial component has been assessed.

The Highway Authority is concerned that the proposal - i) exhibits insufficient on-plot parking provisions which are likely to create undue and injudicious displaced parking on the local road network and ii) would impose added and unreasonable traffic burden on the local road network namely the Hillingdon Circus signalled junction which currently operates at and beyond workable capacity, contrary to Policies AM14 and AM7 respectively of the Development Plan (2012) and emerging Local Plan Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and the National Planning Policy Framework (2019).

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

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

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

TREES AND LANDSCAPING

The former Master Brewer has been the subject of a number of previous applications, including 2017/3183, which was refused.

The site is covered by TPO 6, however, there are no protected trees remaining on the master Brewer site. Two oaks T7 and T9 survive on the Council-owned land in the south-east.

The site lies within Hillingdon's Landscape Character Area G3: Yeading Brook River Corridor

BACKGROUND TO COMMENTS

These comments follow a site visit with the design team on 20 September 2019, a pre-application meeting on 21 November 2019, reference to the D&AS, dated October 2019 and submitted landscape drawings, by BMD.

TREES & SITE CONTEXT

Since the previous application the site has largely been cleared, involving the removal of a large

number of trees, which were previously identified and assessed on the tree survey by BMD, dwg. ref. 14.052,902 Rev P1. As a result of the site clearance, any boundary screening is now heavily reliant on off-site, or 'borrowed' tree cover which lies outside the control of the developer.

Remaining tree cover includes the wooded road embankment alongside Long Lane (west boundary), tree and shrub cover at the top of the retaining wall adjacent to the A40 (north), the mixed woodland on the Council-owned land (south-east corner) and the part-wooded Green Belt land of Freezeland Covert to the east. Since the previous applications, the current developer now owns the plot of land adjacent to the east boundary which will facilitate both visual and physical connectivity between the site and the public open space to the east.

Further to the pre-application discussion additional / replacement tree planting, using native species, has been proposed by BMD, within the site, in an attempt to re-inforce the tree screen on the Long Lane (west boundary). More recently the large Weeping willow at the site entrance (on highway land) has suffered from the collapse of a major limb and will be removed by the Council. - This work is essential for reasons of safety and sound arboricultural management. Although the tree is not protected by TPO, it is a prominent feature and local landmark, and had been identified for retention and inclusion in the site masterplan. The loss of this tree presents an opportunity for the developer to provide a suitable replacement focal point on this prominent corner.

LANDSCAPE MASTERPLAN

The proposed masterplan includes an entrance square, a central green space, green 'fingers' linking the east of the site with the public open space to the east, the provision of landscaped pedestrian routes, the introduction of private amenity space and shared space at ground and roof top /podium levels. The masterplan proposes six distinct character areas; Hillingdon Circus, The Approach, High Gardens, Brewery Garden, The Wanders and The Meadow (p.77).

A soft landscaped buffer along the southern boundary is intended to safeguard the off-site (protected) oaks and retain space and opportunity for the future redevelopment of the Council-owned land to the south-east - as indicated in the aerial perspective (p.74).

LANDSCAPE & BIODIVERSITY

The D&AS notes the presence of London Wildlife Trust sites in the vicinity (p.48), which are situated along two principal wildlife corridors on a north-south axis, to either side of the site. The landscape proposals for the development seek to bridge the gap between the two green corridors.

The landscape masterplan further defines six character areas; Arrival Square, Natural Edge, Entrance Courtyards, Central Parklands, Podium Gardens and Green Streets, with the latter incorporating SUDS (p. 114, please refer to the drainage specialists for comment).

A play space strategy is described (p.112), which will provide facilities for Doorstep Play (0-5's), Local Playable Space (5-11's) and Youth Space (12+).

Specific (illustrative) landscape features include green and brown roofs, hard landscape materials, street furniture, external lighting and proposed tree and planting palettes.

The planting palettes include a mix of native species and ornamental varieties which are known to be pollen / nectar bearing - and of value to wildlife.

The 'removed and retained' tree strategy (p.122) is somewhat disingenuous, since it fails to convey a large number of good trees which have already been removed prior to the submission of the application, with only trees along the northern boundary remaining (prior to removal).

The planting of over 200 new / replacement specimen trees is proposed

PROPOSED BUILDINGS

The current layout features the tallest building in the north-west corner with other building stepping down towards Hillingdon Circus (south) and towards Freezeland Covert in the east..

SUMMARY / CONCLUSION

The tree loss on the proposed development is significant, with much of the tree removal already implemented. As previously noted the quantum of loss was previously accepted by the Council, as part of the Tesco scheme. No protected trees will be removed to facilitate the development.

The additional height of the proposed development will inevitably have greater visual impact on the surrounding receptors.

The open spaces and landscape proposals within the site appear to be an improvement on the previous schemes, albeit the potential adverse effects on daylight and microclimate are not known.

The acquisition of the plot of Green Belt land to the east is, potentially, a significant benefit to the scheme and presents new opportunities to improve both the visual and physical connections to the Green Belt. The 2017/3183 application included a S.106 contribution to develop and implement a comprehensive landscape masterplan (by Grontmij) for the Green Belt land between the site and Freezeland Covert.

Biodiversity Net Gain and Urban Greening Factor calculations have been prepared by the London Wildlife Trust. It is not known when this assessment was carried out in relation to the tree removal from the site, however, report notes that the benefits of the scheme will depend on a revised plan and as yet unspecified future management details will be required. It also refers to the retention and enhancement of existing broadleaf woodland - which does not form part of this masterplan.

The urban greening factor has been introduced as part of the London Plan, as a means of scoring the merit of various green infrastructure and SUDs interventions across the urban environment.

The developer should provide a measured assessment and scoring of these landscape and wider environmental benefits provided by the development, to aid the assessment of the scheme by the LPA.

RECOMMENDATIONS

If you are minded to approve this scheme, landscape conditions should include conditions RES8, RE9 (parts 1,2,3,4,5 and 6) and RES10 (as set out below) and a S.106 agreement to secure landscape enhancement of the Green Belt land to the east of the development site.

RES8) Trees, hedges and shrubs shown to be retained on the approved plan(s) 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 (or after) 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.

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:

RE9) 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.

3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

RES10) No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. 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 Cycle Storage

2.c Means of enclosure/boundary treatments

2.d Car Parking Layouts (including demonstration that 5% of all parking spaces are served by electrical charging points)

2.e Hard Surfacing Materials

2.f External Lighting

2.g Other structures (such as play equipment and furniture)

3. Living Walls and Roofs

3.a Details of the inclusion of living walls and roofs

3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance

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

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

5. Schedule for Implementation

6. Other

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

6.b Proposed finishing levels or contours

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

ENVIRONMENTAL PROTECTION UNIT (AIR QUALITY)

(comments provided by Air Quality Experts Global Ltd (acting on behalf of the Council))

The proposal seeks 514 residential units and comprises in total 12 buildings, located within the A4/Long Lane Focus Area. The proposed development, due to its size and location, will add to current exceedances of the nitrogen dioxide annual mean limit value within this sensitive area as a result of both traffic and energy production emissions.

It is noted that the impact on local air quality of nitrogen dioxide emissions associated with energy production was not assessed as part of the air quality assessment submitted to support the planning application. When such contribution is added to the traffic emissions, there will be at least a moderate adverse impact on local air quality, at least at receptor "R18, Douye School East", which already experiences a concentration (51.35 microg₂-grams/m³) well above the limit to safeguard human health (40 micrograms/m³).

In addition, the applicant has not submitted the air quality neutral assessment as per the Mayor's requirement. However, to support the process, LBH has undertaken the calculations and the proposal is not air quality neutral in terms of traffic emissions. As per the London Plan, developments need to be neutral as minimum and contribute actively to reduce pollution in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

DAMAGE COST AND MITIGATION MEASURES

Therefore, a section 106 agreement with the LAP of £294,522 would have to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels, assuming no local network congestion would be exacerbated by the proposal. However, LBH Highways comments on the traffic impacts of the proposal reveal that there will be an exacerbation of congestion at the road network affected by the vehicular movements associated with the operational phase of the proposed development. Congested traffic emits significantly higher loads of pollution levels due to idling and stop start emissions. As per LBH Highways reported concerns, the highway/transport related consequences of the residentially dominant 514 residential proposal with a commercial component will impose added and unreasonable traffic burden on the local road network (namely the Hillingdon Circus signalled junction which currently operates at and beyond workable capacity) with resulting hazardous impacts on local air quality and public health. In addition, as reported above, the proposal is not air quality neutral, as required by the London Plan, and no suitable mitigation measures were offered by the applicant, as required by the National Planning Policy Framework (2019).

This is contrary to Policy EM8 of the Development Plan (2012) and emerging Local Plan Part 2

Development Plan Policy DMEI 14, the London Plan, and the National Planning Policy Framework (2019).

2 Reason for Refusal (if objecting) Refusal on air quality and public health grounds and absence of suitable mitigation measures is therefore recommended.

As the application site is within an Air Quality Management Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (2020), London Plan Policy 7.14, and paragraph 170 of the National Planning Policy Framework (2019).

3 Observations

Should Members be minded to approve this application, a suitable S106 contribution will have to be calculated using congestion traffic information. In addition, two Air Quality conditions are required to develop and implement a Low Emission Strategy and manage the construction fleet as per Mayor requirements.

See text below.

Condition Air Quality - Low Emission Strategy

1. No above ground works shall be undertaken until a clear and effective low emission strategy (LES) have been submitted to and approved in writing by the Local Planning Authority. The strategy shall include, but not be restricted to:

a) effective ways to manage contractual arrangements with the occupiers of the flexible commercial use so that the fleet composition serving the site facilities will be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards;

b) provision of a clean supply of energy to the site. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements. The boilers to be specified to meet ultra-low NOx emissions standards of < 40mg/kWh.

The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority.

c) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with the minimum requirements as per the London Plan.

d) a clear and effective strategy to encourage/support staff and residents of the site to

i) use public transport;

ii) cycle / walk to work where practicable;

iii) enter car share schemes;

iv) enter cab share schemes to and from the airport and or home / work locations;

iv) purchase and drive to work zero emission vehicles.

Measures to support and encourage modal shift, will include but be not restricted to incentives for residents and employees to use public transport to reduce their car ownership.

The measures in the agreed scheme shall be maintained throughout the life of the development.

Reason - As the application site is within an Air Quality Management Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, and

paragraph 170 of the National Planning Policy Framework (2018).

Air Quality - Construction

2. No development shall commence until proof of the registration in GLA's database (nrmm.london/nrmm/about/what-nrmm-register) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority.

3. The London's Low Emission Zone for non-road mobile machinery to comply with the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.

4. This will apply to both variable and constant speed engines for both NOx and PM. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments.

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and London Plan Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition' (2014).

Wider Context

Focus areas are defined as locations where pollution levels are already high and there is relevant public exposure. In such circumstances there is a requirement to put in place actions to improve air quality. In addition, there is a requirement under planning policy (London Plan and LBH Local Plan) for development to be at least air quality neutral and to not cause further deterioration of existing air quality.

The air quality assessment provided has assessed the development in terms of the air quality impacts on existing receptors from the operational traffic associated with the development. The pollution impact has been assessed in the opening year of 2021 both with and without the development, with the development causing a worsening of a future-predicted exceedance. In such circumstances any increases in pollution are judged to be significant and the development will require to provide sufficient quantified mitigation measures to ensure this risk to public exposure is addressed.

In terms of transport the benchmark figure is exceeded, therefore the development is not air quality neutral in terms of transport emissions.

Given the location, this development is not supported without the submission of an air quality neutral assessment detailing the building emissions assessment and any appropriate mitigation to ensure neutrality, plus a quantified low emissions strategy addressing the transport emissions to ensure neutrality. This approach is supported by the Mayor of London Sustainable Design and Construction SPG 4.3.26.

The Applicant was given the opportunity to respond to the above comments and on 31.01.19 Air Quality Experts Global Ltd (acting on behalf of the Council) provided the following further comments:

1) our initial views, observations, and recommendations still stand and please refer to them in your final report (attached again for your reference). In regards to the final S106 contribution due to air quality, the applicant has not provided any quantification of the emission reduction any proposed measures would achieve and what benefits would they yield in terms of air quality. The final damage cost can only be reduced if such quantification is undertaken. Therefore, as we had offered already a 10% discount assuming an effective travel plan would be implemented, we can only offer a further 5% discount, subject to agreed contributions towards either modal shift (assuming they contribute to

public transport solutions) and / or green wall implementation. These measures will have to be secured by a bond, tying the applicant to implement the measures (to be agreed with LBH). I attach the final value, assuming they will implement such agreed/accepted measures(to be agreed with Val/Alan). The new value will be £278.159.

2) in regards to the proposal related monitoring:

a) monitoring locations chosen - these are not located at hot spot locations where GLA mapping depicts exceedances to the limit value (annual mean - nitrogen dioxide) and which are likely to be affected by the proposed development

b) monitoring duration - three months of monitoring is bare minimum and really not ideal to draw conclusions on annual mean values and compliance status to safeguard human health; once three months of data are captured, values need to be annualised using data from other locations once full year calendar data are available as per Defra's TG16 guidance - to observe this, it will be too late to support the application ;

c) conclusions in the updated report based on 10 days of monitoring data are unacceptable;

d) monitoring is taking place now (end December 2019/January 2020); model verification used 2017 data - no comparisons can be made between modelled and monitored data as attempted by the applicant;

3) no neutral assessment was again submitted by the applicant as per the London Plan requirements. As per LBH calculations the proposed development is not neutral and no proof to contrary has been provided to date by the applicant;

4) argument regarding worsening of existing exceedances as insignificant is contrary to LBH, GLA , and NPPF Policy which require air pollution is not further deteriorated within sensitive locations by new development. The proposed development is within an AQMA and a Focus Area. This is also against actions and efforts within LBH Air Quality Local Action Plan which works towards proposals actively improving air quality within Focus Areas ;

5) Mitigation offered is not quantified in terms of emission reduction achieved therefore cannot be considered as balanced and in direct proportion to the emissions produced by the development; it is noted that the site is currently a brown field site;

6) Whereas the applicant claims the new proposed development (514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); with associated car park (164 spaces)) will not exacerbate congestion in the area and has insignificant impact on local air quality, no suitable evidence has been produced to substantiate that. In addition, this claim is contrary to LBH Highways observations.

7) Finally, the impact on local air quality of nitrogen dioxide emissions associated with energy production was still not assessed as part of the air quality assessment submitted to support the planning application. As noted in our original response, when such contribution is added to the traffic emissions, there will be at least a moderate adverse impact on local air quality, at least at receptor "R18, Douye School East", which already experiences a concentration (51.35 ug/m3) well above the limit to safeguard human health (40ug/m3). Furthermore, no Root Mean Square Error (RMSE) was calculated for the modeled results, so LBH does not have a measure of model performance and or uncertainty range associated to the results reported.

The Applicant responded to the above comments and Air Quality Experts Global Ltd (acting on behalf of the Council)) provided further comments as below:

1) our initial views, observations, and recommendations still stand and please refer to them in your final report (attached again for your reference). In regards to the final S106 contribution due to air quality, the applicant has not provided any quantification of the emission reduction any proposed measures would achieve and what benefits would they yield in terms of air quality. The final damage cost can only be reduced if such quantification is undertaken. Therefore, as we had offered already a 10% discount assuming an effective travel plan would be implemented, we can only offer a further 5% discount, subject to agreed contributions towards either modal shift (assuming they contribute to public transport solutions) and / or green wall implementation. These measures will have to be secured by a bond, tying the applicant to implement the measures (to be agreed with LBH). I attach the final value, assuming they will implement such agreed/accepted measures(to be agreed with Val/Alan). The new value will be £278.159.

2) in regards to the proposal related monitoring:

a) monitoring locations chosen - these are not located at hot spot locations where GLA mapping depicts exceedances to the limit value (annual mean - nitrogen dioxide) and which are likely to be affected by the proposed development

b) monitoring duration - three months of monitoring is bare minimum and really not ideal to draw conclusions on annual mean values and compliance status to safeguard human health; once three months of data are captured, values need to be annualised using data from other locations once full year calendar data are available as per Defra's TG16 guidance - to observe this, it will be too late to support the application ;

c) conclusions in the updated report based on 10 days of monitoring data are unacceptable;

d) monitoring is taking place now (end December 2019/January 2020); model verification used 2017 data - no comparisons can be made between modelled and monitored data as attempted by the applicant;

3) no neutral assessment was again submitted by the applicant as per the London Plan requirements. As per LBH calculations the proposed development is not neutral and no proof to contrary has been provided to date by the applicant;

4) argument regarding worsening of existing exceedances as insignificant is contrary to LBH, GLA , and NPPF Policy which require air pollution is not further deteriorated within sensitive locations by new development. The proposed development is within an AQMA and a Focus Area. This is also against actions and efforts within LBH Air Quality Local Action Plan which works towards proposals actively improving air quality within Focus Areas ;

5) Mitigation offered is not quantified in terms of emission reduction achieved therefore cannot be considered as balanced and in direct proportion to the emissions produced by the development; it is noted that the site is currently a brown field site;

6) Whereas the applicant claims the new proposed development (514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); with associated car park (164 spaces)) will not exacerbate congestion in the area and has insignificant impact on local air quality, no suitable evidence has been produced to substantiate that. In addition, this claim is contrary to LBH Highways observations.

ENVIRONMENTAL PROTECTION UNIT (CONTAMINATION)

I have reviewed the Preliminary Geo-Environmental Risk Assessment; Issued: October 2019; Project No. 17-0420.02; Prepared by: Delta-Simons Environmental Consultants Limited

The risk assessment and preliminary conceptual site model (CSM), identify various contaminants, (possibly associated with Made Ground), that may be present at the site.

Despite the Pollutant Linkage Assessment within the report (pp14-15) indicating a generally low risk, (low to moderate risk in terms of the made ground), of significant contamination across the site, there are however areas associated with underground tanks and reservoir where uncertainty exists.

Therefore, it is recommended that conditions be imposed as follows:

Proposed conditions for land affected by contamination.

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

a) A targeted site investigation, focusing on areas of potential contaminants at: i) the location of the infilled pond; ii) the location of the underground reservoir / storage tank/s. The investigation should include, 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

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

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

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

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

REASON

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

Observations:

Previous reports have identified the presence of:

- PAH
- Total Petroleum Hydrocarbons
- Metals
- Sulphates
- A former pond (now infilled)
- Underground storage tank/s (UST)
- A covered reservoir is also shown on mapping. (However, it is understood the possible connection of the UST structures and/or their continued presence at site are unknown).

ACCESS OFFICER

In assessing this application, reference has been made to the 2016 London Plan and its contained policies 3.5, 3.8 and 7.2. Whilst the supporting Design & Access Statement suggests that the development would be compliant with London Plan policy 3.8, the plans do not adequately demonstrate how the prescribed standards have been incorporated, and importantly, exactly where within the building the M4(3) units would be situated. Likewise, no information has been provided on how principles of Inclusive Design have been considered and applied throughout the development, and further details would also be required in this regard:

1. Details of the external environment and how it would cater for all that disabled people, to include suitable walkways and wayfinding for blind and visually impaired persons have not been provided/.
2. A drop-off point for door-to-door service providers, to include large Dial-A-Ride vehicles is not shown on plan, and should be provided for a development of the scale'
3. An accessible parking space, designed in accordance with BS 8300:2018, should be allocated to every M4(3) wheelchair accessible/adaptable unit.
4. 10% of new residential units would need to meet the standards for M4(3) Category 3 - wheelchair user dwelling. The units should be interspersed throughout the development, to include all typologies and tenures, which must be fully detailed on plan
5. The M4(3) dwellings for sale on the open market should meet the minimum standards required for a Wheelchair Adaptable home, with all Affordable Housing dwellings constructed to a Wheelchair Accessible standard, making them suitable for 'day one occupation' by a wheelchair user. These units should be shown on plan to demonstrate functional and spatial provisions for wheelchair adaptable and/or wheelchair accessible housing.
6. A floor plan at no less than 1:100 should be submitted for each of the different M4(3) units. All details, to include transfer zones, wheelchair storage area, and other spatial requirements within bedrooms, bathrooms, living and dining areas, should be shown on a separate plan for every different unit type.
7. Where lift access is necessary to achieve a step free approach to the principal private entrance, all M4(3) units should be served by at least two lifts.
8. The landscaping strategy for any intended roof gardens should detail the accessibility provisions, to include pathway surfacing, seating and play space.
9. Details are required on the accessible play equipment for disabled children, to include those with a sensory impairment, or complex multiple disabilities. Provisions could include outdoor sound

tubes, colour and lighting canopies, and other play equipment that could stimulate the olfactory senses. Inclusive play is a key requirement of any new residential development.

10. No details have been provided on the means of escape provisions for older or disabled people in the event of a fire or similar emergency situation.

Conclusion: unacceptable. The proposed development in its current format fails to include sufficient detail to demonstrate compliance with London Plan policy 3.5, 3.8 and 7.2.

Following the submission of further information the Access officer provided the following comments:

Following review of the submitted layout plans for the proposed M4(3) Wheelchair Accessible/Wheelchair Adaptable dwellings, the previous accessibility concerns have been addressed.

However, a number of concerns relating to the external environment remain outstanding which could be addressed via the proposed planning conditions:

Not less than one accessible parking space shall be allocated to each Wheelchair Home Standard dwelling house, which shall be secured by way of deed or covenant. The accessible parking bays shall accord with the design principles as set out in BS 8300:2018, with all defining features and facilities retained in perpetuity.

REASON: To ensure that sufficient housing stock is provided to meet the needs of wheelchair users in accordance with Policy 3.8(d): Housing Choice of the adopted London Plan (March 2016).

The development hereby approved shall ensure that 10% of the residential units are constructed to meet the standards for Category 3 M4(3) dwelling, with all remaining units designed to the standards for Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.

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

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

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

Prior to the occupation of the development hereby approved, details of children's play equipment to be installed, to include young people with sensory and/or complex multiple disabilities, shall be submitted to and approved in writing by the Local Planning Authority; all such provisions shall remain in place for the life of the building.

REASON: To ensure that all children and young people, including those with sensory, complex or multiple disabilities, have access to suitable play areas and equipment, in line with London Plan 3.6 and 7.2

No development shall take place until details have been submitted to and approved in writing by the Local Planning Authority of: (i) an external environment that is conducive to the mobility needs of blind and visually impaired people, to include wayfinding and suitable crossing points, materials and street furniture that provide adequate contrast against which they are seen; (ii) pavers and other surfacing materials that provides wheelchair users with a smooth, seamless surface, with appropriately positioned crossing points. Thereafter, the development shall be implemented in accordance with the approved details and the accessibility features shall thereafter be retained in

perpetuity.

REASON To ensure that older and disabled people have good access to the development in accordance with policy 7.2 of the London Plan (2016).

EXTERNAL CONSULTANTS ACTING ON BEHALF OF LB HILLINGDON

NOISE

Following an initial review by Anderson Acoustics (Acting on behalf of the Council), the Applicant submitted further information. In response, Anderson Acoustics provided the following recommendations (04-02-20):

In terms of the scope of this review, the suitability of the PAAA, and the scheme's compliance with policy, rests on whether sufficient consideration has been given to the layout/design with respect to acoustics, ventilation and overheating. As it stands, it is our opinion that this is not demonstrated at present with regard to the cooling hierarchy and the effect of internal noise levels if the windows are required to be open for cooling. It is recommended, therefore, that further information be sought from the developer to demonstrate, if this is indeed the case, that the risk of overheating throughout the development is at an acceptable level. This may be as simple as submitting the over heating analysis that has already been produced but is not publicly available. It is recognised that the PAAA has been updated to provide the requested further information on:

- The good acoustic design process;
- External amenity noise levels and mitigation to these areas;

The following information that was requested following the Rev.8 review has not been provided and the request is reiterated:

- Further information on the proposed ventilation system intake and extract locations and cooling potential;
- Confirmation that the LAFMAX and WHO guidelines for internal noise levels in bedrooms at night are met;
- Baseline background sound levels and discussion of plant and commercial use noise assessment to be conducted at detailed design stage.

Our recommendations are summarised as follows:

- For LBH to request from the developer justification for the MVHR in the context of the London Plan's cooling hierarchy and sustainable development;
- For LBH to request the over-heating analysis mentioned is submitted to assist in the determination of the planning application;
- For the LBH, in the event of planning permission being granted, to apply conditions for the CEMP; commercial and plant noise assessment and limits; and details of the final noise mitigation (including external amenity areas), ventilation and cooling strategy.

DAYLIGHT SUNLIGHT (Lambert Smith Hampton)

Following an initial review by LSH (23/12/19) and the response letter dated from Robinsons dated 24/01/20, LSH comment as follows (31/01/20):

Window Transmittance and Surface Reflectance

The main issue with the values used relate to the glazing, the chosen system is high end glazing units. If this type of glazing is used in the development, then the results for daylight will be as per the Robinson report. If however, high end glazing units are not used in the development, then the results would be more detrimental to daylight results.

Perhaps consideration should be given to make a planning condition for high end glazing units, to ensure the daylight results are achieved.

Daylight

Dealing firstly with average daylight factor (ADF), our original letter gave the British Standard definition of open plan living areas, notably a lounge/dining area intrinsically joined to kitchens. The kitchens are clearly linked to the dining areas and lounge areas. The Robinson report have given their reasons for removing the kitchen sections of the rooms, citing that these kitchens are rooms that are considered too small to be considered habitable and suitable for daylight and sunlight analysis.

The Robinson letter states that the London Borough of Hillingdon has accepted this approach in the past and this method was accepted in the previous application.

The BRE guidance states (2.1.14) non-daylit kitchens should be avoided where ever possible.

This point will be for Hillingdon to determine if removing the kitchens for assessment is acceptable. Moving to daylight distribution (DD), the BRE guidance and RICS guidance note both state that DD should be calculated. If an area of the working plane lies beyond the no sky line (more than 20%), daylight will be poor and supplementary lighting will be required.

The Robinson analysis shows that 310 of the rooms fall short of the target values, of these, 224 are bedrooms. The guidance does recognise that daylight is less important in bedrooms.

It will be for Hillingdon to decide if the remaining 86 rooms that fall short are acceptable. It should be noted that we do not know how many rooms in total were analysed.

Sunlight

The BRE guidance and RICS guidance note state that windows should be tested for APSH, the Robinson report has analysed and used room results, as these are more favourable than window results.

The Robinson response states that this method was accepted by Hillingdon in the previous application. Again, it will be for Hillingdon to decide if using room results over window results are acceptable.

Overshadowing

We have no comments to make on this as the results confirm the scheme does comply

7. MAIN PLANNING ISSUES

7.01 The principle of the development

This application seeks full planning permission for a residential led mixed-use development comprising 514 residential units and flexible commercial space (Use Class B1/A1/A3/D1).

The National Planning Policy Framework (2019) has a requirement to encourage the effective use of land and encourages the use of previously developed, vacant and underutilised sites to maximise development potential, in particular for new housing. Chapter 5 of the National Planning Policy Framework (NPPF), supports the delivery of homes, confirming that local authorities should, through their Local Plans, demonstrate how housing targets and objectives will be met. Particular emphasis is given to housing delivery over the next five years, but authorities are also required to consider growth beyond this.

Policy H1 of the Local Plan: Part 1 - Strategic Policies gives general support to housing provision to meet and exceed the Council's minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

London Plan (2016) policy 3.3 similarly seeks to ensure that London's housing needs are met. This objective is reiterated in the Mayor of London's Supplementary Planning Guidance (SPG) on Housing, although it must be noted that the SPG is clear that in achieving housing targets, full account must be given to other policy objectives and that to address London's strategic housing requirement and reconcile any local disparities between housing need and supply, boroughs should identify and proactively seek to enable extra housing capacity through the preparation of their Local Plans.

Notwithstanding this general policy support for new residential developments, it is clear that careful consideration must be given to the ability of development proposals to also meet other planning policies and also the ability of authorities to meet their housing needs.

The application site forms part of the adopted site allocation; Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part 2 - Site Allocations and Designations (2020). This site allocation designates land to the east and west of Long Lane as a strategic site allocation, for a residential led mixed use development. The site allocation itself comprises of Site A and Site B. This application site falls within Site B of that broader allocation, however the application site does not comprise the whole of Site B.

Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part 2 - Site Allocations and Designations (2020) states that the Council will support mixed use proposals on Site B that meet the following criteria:

"Development within the developed areas should:

- Secure substantial planting and landscaping in association with any development;
- Promote a mix of uses that takes advantage of the north/south east/west communications network to serve Borough-wide and community interests;
- Environmental improvements and landscaping as necessary to enhance the local shopping and residential environment; and
- Result in public transport improvements particularly North/South links.

Should proposals come forward that involve the development of Sites A and B for predominantly residential purposes, the following key principles will need to be considered.

- A range of housing types and tenure will need to be provided on the site, to reflect the conclusions of the Council's latest Housing Market Assessment.
- The key urban design principles should result in the creation of a neighbourhood with clearly defined links to the main shopping area in North Hillingdon, where the scale and massing of buildings reflects local character and the PTAL rating of the site.
- Whilst the nature of the scheme will be predominantly residential, the Council will accept a proportion of other uses that are appropriate to the site's location within the North Hillingdon Local Centre, including a hotel, restaurant and small scale retail."

More broadly, the wider SA14 allocation is also required to meet the following policy requirements, also set out within adopted Site Allocation policy SA14;

"All proposals across Sites A and B should:

- Be of a scale that is in keeping with the Local Centre; and
- Form a comprehensive development scheme across the whole site.

The cumulative impact of any proposed retail or leisure development on this site and the adjoining Master Brewer site will be taken into account by the Council when considering any future proposed scheme; in particular in terms of their likely effects on surrounding residential areas and shopping centres, public transport services and the local road network."

The principle of residential-led mixed-use development on the site is therefore established through the development plan. However, the form of the current application fails to meet with Policy SA14 in a number of ways, both for Site B itself and also for the wider site allocation of Sites A and B. All of the specific issues are discussed in detail within the body of this report, but to summarise;

- the proposals fail to secure substantial planting and landscaping in association with the development resulting in a stark and oppressive built form when viewed from the surrounding area, in both short and long views;
- the proposed commercial uses within the scheme are contained within the site and are likely to have limited linked functions/trips to the existing local centre, therefore failing to enhance the existing local centre;
- the proposals fail to deliver a scheme of an appropriate scale and massing to reflect the local character and are not in keeping with the Local Centre.

HOUSING SUPPLY

The proposed development would provide 514 new residential units, which will contribute towards the Council's housing supply, however for clarification purposes, this site is not required for the London Borough of Hillingdon to demonstrate a supply of deliverable sites sufficient to provide a minimum of five years worth of housing against the adopted London Plan (2016) and the 10,380 homes target identified in Policy H1 of the Intend to Publish version of the London Plan (2019). Therefore whilst the delivery of new homes is welcomed on this site, the failures of the current proposals outweigh the need for housing delivery in the borough, as the Council is able to demonstrate a five year housing supply.

Local Centre

The site falls within a designated Local Centre. Policy E5 (Town and Local Centres) of the Local Plan Part 1: Strategic Policies (2012) says that the Council will improve town and neighbourhood centres across Hillingdon and improve public transport, walking and cycling connections to town and neighbourhood centres whilst ensuring an appropriate level of parking provision is provided for accessibility to local services and amenities.

The re-use of previously developed land in Local Centre for new housing as part of a mixed use schemes is considered to be consistent with both national and local planning guidance. However Policy E5 of the Hillingdon Local Plan Part 1 Strategic Policy does however stipulate that an appropriate level of parking provision is provided for accessibility to local services and amenities. In particular regard to parking, the proposed scheme is not considered in accordance with this part of Policy E5 of the Hillingdon Local Plan Part 1 Strategic Policies (2012) which is detailed further under section 7.10 of this report.

Commercial Uses

Paragraph 80 of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

A mixed use development incorporating some commercial uses is therefore supported by the NPPF. It is however noted that planning permission is sought for 1,200sqm of commercial floorspace, comprising a range of use classes including A1; retail, A3;

Restaurants and Cafes, B1; Business/Offices and D1; Non-residential institutions. There is no in principle objection to the uses proposed, however there is a concern that all of the 1,200sqm could be used solely for just one of those uses, rather than a mixture of these uses. Therefore had this application been approved, a condition restricting the quantum of each use would be imposed to ensure an adequate mix of uses is secured to ensure the vitality of the ground floor uses. Furthermore, some uses within the D1 use class can cause significant concern due to the associated traffic generation, such as nurseries, schools and places of worship. Therefore had planning permission been granted, a restriction of the final use of any D1 uses facilitated on the site would have precluded occupation by the aforementioned uses to prevent detrimental impacts on the local highway network.

In summary, the principle of redeveloping this vacant site for residential led mixed use is considered to be in accordance with the development plan and is therefore deemed acceptable in principle.

Therefore whilst the principle of mixed use is established by the Site Allocation; SA14, the application must also be assessed against all other planning policies as a whole as well as other material planning considerations.

7.02 Density of the proposed development

DENSITY

The application site has an area of 2.53 Ha. The local area is considered to represent a suburban context and has a Public Transport Accessibility Level (PTAL) of both 2 and 3 (where 0 is low and has low levels of accessibility and 6 is the highest PTAL level). Policy 3.4 of the London Plan says that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 and development proposals which compromise this policy should be resisted. Table 3.2 of the London Plan recommends that for sites with a PTAL rating of 2 - 3, a density of between 150-250 habitable rooms per hectare and 50-95 units per hectare (assuming 2.7-3.0 hr/u) can be achieved. For an urban context, Table 3.2 of the London Plan recommends a range of 70-170 u/ha or 200-450 hr/ha and for a central setting the London Plan suggests a density of 100-240 u/ha or 300 - 650 hr/ha.

Notwithstanding the above policy reference in the latest version of the emerging London Plan (Intend to Publish version Dec 2019) demonstrates the removal of the density matrix table 3.2 which is used as a guide for decision makers to assess optimal density for housing sites. It is therefore considered that whilst referred to above the optimal density should be assessed against the Local Planning Authorities density matrix within its adopted Local Plan.

Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2. Developments will be expected to meet habitable rooms standards. Table 5.2 stipulates a density standard of 200-510 hr/ha or 80-170 u/ha.

The residential density of the proposed scheme would be 552 hr/ha (based on 1398 habitable rooms) or 203 u/ha which exceeds the upper limit of the indicative range within Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020); Table 5.2 and Table 3.2 of the London Plan (2016).

The Planning Authority accept that the density matrix should not be applied mechanically enabling account to be taken of other factors relevant to optimising potential such as local context, design, transport, social infrastructure open space.

Draft Policy D3 of the London Plan (Intend to Publish version Dec 2019) advocates a design led approach in order to optimise site capacity. It should be noted that the policy refers to 'optimisation' and not maximisation. The proposed development deviates from optimising the site to maximising the sites capacity by failing to meet some of the key requirements of draft policy D3 of the London Plan (Intend to Publish version Dec 2019) insofar as the scheme fails to enhance the local context by imposing a scale on the local neighbourhood centre that has no bearing on the existing and emerging street hierarchy. It is acknowledged that an extant consent on Site A has a greater form than that of the neighbourhood centre, indeed the application site itself previously had consent for a greater scale of development than its immediate environs, however these development proposals were of a scale that respected the existing environment. Their form respected the existing local centre but the current proposals fail in this respect by imposing a height, massing and scale that bear no resemblance to that of the surroundings.

The site is not considered to lend itself to high density development and is therefore contrary to London Plan Policy 3.4 (2016) and Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020); Table 5.2. Furthermore, the proposed development is considered to represent over development of the site to the detriment of the local area.

UNIT MIX

Policy DMH 2 (Housing Mix) of the Hillingdon Local Plan Part 2: Development Management Policies (2020) says that the Council will require the provision of a mix of housing units of different sizes to reflect the Council's latest information on housing need.

Policy H10 of the Intend to Publish version of the London Plan 2019 (Part A6) also states that unit mix should take account of the nature and location of the site with a higher proportion of one and two bed units generally deemed more appropriate in town centre locations, such as this site.

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

1 bed x 221 (43%)
2 bed x 216 (42%)
3 bed 5 person x 77(15%)

The proposed mix of units is considered appropriate and acceptable for this location and is therefore consistent with Policy DMH 2 (Housing Mix) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (Intend to Publish version 2019).

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

ARCHAEOLOGY

Policy 7.8 of the London Plan (2016) seeks to protect and conserve heritage assets and archaeological remains and this is reiterated in draft Policy HC1 of the London Plan (Intend

to Publish (Dec 2019)). Paragraph 189 of the NPPF (2019) says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

Policy DMHB 7 (Archaeological Priority Areas and Archaeological Priority Zones) of the Local Plan: Part 2 - Development Management policies (2020) says that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

In this regard an Archaeological Desk Based Assessment has been submitted in support of the application and Historic England (GLAAS) have been consulted.

Although the site does not fall within an Archaeological Priority Area, Historic England (GLAAS) considers that the proposed development is situated in an area of archaeological interest and where archaeological remains may be anticipated.

The Applicant's archaeological desk-based assessment identifies medium potential for later prehistoric or Roman remains based on recent discoveries in the surrounding area. The site lies on London Clay which has often been considered unattractive to early settlement but these recent discoveries show that, as is found elsewhere in southern/midland England, some settlement expanded onto the claylands in later prehistoric and Roman times. This site could therefore contribute to understanding that process in the hinterland of Londinium. Previous developments on the site are expected to have caused some harm but archaeological remains may survive away from the buildings. The proposed development will involve major groundworks across the site which would likely remove most or all of any surviving remains.

In this instance GLAAS have advised that the development could cause harm to archaeological remains and field evaluation is therefore needed to determine appropriate mitigation. In order to establish if any remains are present a two stage archaeological condition has been requested.

It is considered that a condition as recommended by GLAAS (full text above in the External Consultee section) could be attached to any consent granted in association with this application to secure the implementation of a programme of archaeological work could make the proposed development acceptable in Archaeological terms in line with Policy DMHB 7 of the Local Plan Part 2: Development Management policies (2020), Policy 7.8 of the London Plan (2016), draft Policy HC1 of the London Plan (Intend to Publish (Dec 2019)) and the NPPF (2019).

HERITAGE ASSETS

Paragraph 196 of the NPPF says that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

London Plan Policy 7.7 says that the impact of tall buildings proposed in sensitive locations

should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

Draft Policy HC1 of the London Plan (Intend to Publish (Dec 2019)) also seeks to protect heritage assets and their setting.

Policy HE1: (Heritage) of the Local Plan: Part 1 - Strategic Policies (2012) says that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.

Policies DMHB 1 (Heritage Assets), DMHB 2 (Listed Buildings), DMHB 3 (Locally Listed Buildings) and DMHB 4 (Conservation Areas) of the Local Plan: Part 2 - Development Management policies (2020) all seek to protect heritage assets and their setting.

The site does not fall within a Conservation Area or Area of Special Character. The closest Conservation Areas are Ickenham Village to the north and Hillingdon Court Park to the south. Nearby Listed Buildings include Long Lane Farm Cottages (Grade II listed), the garden walls to the east of Manor Farm House (Grade II) and Ickenham Manor (Grade I) all of which are located to the north. Also to the north is Ickenham Manor Farm which is a Scheduled Monument. Public rights of way provide public access to the wider area.

Having regard of the submitted TVIA and associated Addendum report, the Council's Design and Heritage officer made the following observations:

'There is a hedgerow / treeline that runs along the southern curtilage boundary of the listed buildings. Currently there are glimpse views from the property through the boundary towards the site due to the lack of foliage during the winter months. The proposal will therefore have some negative impact on the setting of the Grade I listed house. This could be made worse if the foliage was ever to be removed, reduced or thinned out. Ickenham Manor has always been situated in a rural setting and the southerly views from the house and surrounding curtilage help to reinforce this important character as they overlook surrounding farmland which is enclosed with verdant hedge and tree lines. The southerly views from Ickenham Manor would therefore be harmed by the construction of the proposed development as the buildings would extend up above the tree line on the horizon. The harm to the setting of the Grade I listed building would be considered less than substantial. The impact would be reduced during the spring / summer months by the trees along the southern curtilage, assuming they are not removed.

With respect to the Ickenham Conservation Area Views 10 and 11 demonstrate that the new development would be seen in views looking towards the site. The proposed development would extend up above the ridgelines and visually infill gaps between houses. Although the views of the TVIA are static it would appear that the development would likely to be visible in a number of kinetic views as one moves through the conservation area as well as from the windows of houses and from rear gardens. One of the strong characteristics of the conservation area is the uninterrupted skyline of hipped roofs and the softening effects of street and privately owned trees. The enjoyment of this roofscape is likely to be affected and as a consequence there will be harm to the setting of the conservation area. The harm would be considered less than substantial.

Many of the other views in the TVIA illustrate the developments impact on the townscape and confirm that it would be a discordant and incongruous development within this modest suburban setting of buildings of two and three storeys.

The longer distance views also demonstrate harm. In particular views 13 and 15 show the development extending up prominently above the tree line whereas the existing established development of the surrounding area is kept well below the treeline retaining a largely uninterrupted skyline of tree canopies which make a positive contribution to the area'.

In summary, the TVIA, which includes some views which have not previously been presented to the Council in other applications lodged at this site, has demonstrated that there will be views of the development from the heritage assets at Ickenham Manor and from within the Ickenham Conservation Area and it is considered that the negative impact of these views will be exacerbated by the height and bulk of the development and the continuous wall of approx 150m which runs along the northern elevation of the site. Having regard to guidance set out in the NPPF, the impact of the development on the setting of these heritage assets is considered less than substantial.

It is not considered that the development enhances or better reveals the significance of the designated heritage assets and the proposed development is considered to represent less than substantial harm to these heritage assets. The NPPF states that where a development will lead to less than substantial harm, as is the case in this development, this harm should be weighed against the public benefits of the proposals. It should be noted that the distance of the development from the heritage assets does diminish the harm caused. Of more concern is the impact on the Green Belt and surrounding streetscape of North Hillingdon Centre, which will be more significant. The development is deemed to be delivering public benefits (in particular affordable housing and public open space) which are discussed elsewhere within this report which are considered to outweigh the less than substantial harm to the specific designated heritage assets of Ickenham Manor and the Ickenham Conservation Area.

Notwithstanding these comments regarding heritage assets, matters relating to the impact upon views and skyline are assessed in greater detail in section 7.07 within this report.

7.04 Airport safeguarding

The application site relates to land approximately 1.5km west of RAF Northolt and falls within the statutory height, birdstrike and technical safeguarding zones surrounding RAF Northolt. The site also falls within the safeguarding zones of Heathrow Airport, located to the south of the application site.

Policies DMAV 1, DMAV 2 and DMAV 3 of the Local Plan Part 2; 2020, seek to support the continued safe operation of both Heathrow Airport and RAF Northolt. Statutory bodies including the Ministry of Defence, NATS and BAA have been consulted and all parties have raised no objections, subject of the imposition of suitable conditions.

The MOD has raised no safeguarding objections regarding the proposed building heights for this development.

The application site is also within the birdstrike safeguarding zone, within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.

Several of the buildings are proposed to have brown or green roofs of varying design and

the drainage strategy for the site includes green roofs, permeable paving, rain gardens and swales. The developer has submitted a Bird Hazard Management Plan (BHMP) to mitigate any potential birdstrike risks / hazards. Having reviewed the plan the MOD confirmed that the provisions set out within the BHMP would provide a robust and effective mitigation of the risk posed by the development, and requested that any permission be issued subject to a condition requiring that the development is carried out strictly in accordance with the submitted BHMP and that those measures set out within the BHMP are implemented in perpetuity.

In summary as long as the swales are generally dry and the BHMP is included as a conditional requirement (and in perpetuity) as part of any planning permission granted, the MOD has no objections to this development.

Any Cranes required during construction have the potential to affect the performance of the Precision Approach Radar (PAR) and therefore air traffic safety. To ensure that the MOD is notified of when and where cranes would be erected the submission of a construction management strategy should be secured by way of condition in the event planning permission were granted (see suggested wording above in the Statutory Consultee section above).

In summary, subject to the inclusion of the recommended conditions there is no safeguarding objection to this application in accordance with policies DMAV 1, DMAV2 and DMAV3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

7.05 Impact on the green belt

Paragraph 133 of the NPPF says that 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 says that the strongest protection should be given to London's Green Belt, in accordance with national guidance. London Plan Policy 7.7 says that the impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of Local Plan: Part 1 - Strategic Policies (2012) says that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.

Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

Policy DMEI 6 of the Local Plan Part 2 (2020) specifically states that new development adjacent to the Green Belt should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

This site is adjacent to the Green Belt (Freezeland Covert) to the east, across the Western Avenue/A40 corridor to the north and to the west. Whilst the site is not within the Green

Belt, it does lie between significant wedges of Green Belt countryside, and it is therefore important to ensure that the visual amenity of those areas is not detrimentally affected by the proposal.

The Green Belt contributes strongly to the local distinctiveness of the area and the street scene along Western Avenue/M40. It is considered important to retain that special open, rural character, as this road provides one of the main access routes to and through Hillingdon.

The Townscape & Visual Impact Assessment (TVIA) which has been submitted as part of the application clearly demonstrates the likely impact of the development on views from within the Green Belt and open countryside. In particular views from the west (View 13) and from the north (Views 1 and 15) and given the scale of the development it is considered to have a detrimental impact on those views and on the openness of the Green Belt and open countryside.

In summary, the development itself, primarily because the site is not within the Green Belt, does not conflict with paragraph 133 of the NPPF, policy DMEI 4 of the Hillingdon Local Plan Part 2- Development Management Policies (2020), policy E2 of the Local Plan Part 1 and Policy 7.16 of the London Plan Part 1 (2012) as the development is not within or encroach onto any Green Belt designated land.

However, due to the proposed building height and scale and the proximity of the buildings so close to the site boundary with only very little landscape screening, the development creates a detrimental visual impact when viewed from the wider area and specifically from the Green Belt when viewed from the north and west, which arises primarily because of the height and continuous wall of development along the northern and western boundaries. In particular the long distance views from the west (view 13) are considered to be important, as they form part of the setting of the Green Belt and open countryside which currently benefits from far reaching views of Harrow and London.

7.06 Environmental Impact

GROUND CONTAMINATION

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan: Part 2 - Development Management Policies (2020) says that the Council will support planning permission for development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely used through remediation. This is supported by Policy 5.21 of the London Plan (2016).

A geo-environmental risk assessment has been submitted in support of the application. Despite the Pollutant Linkage Assessment within the report indicating a generally low risk, (low to moderate risk in terms of the made ground), of significant contamination across the site, there are however areas associated with underground tanks and reservoir where uncertainty exists.

In light of the findings of the site investigations and advice from Environment Protection Unit, had the application been acceptable in other respects, a condition would have been recommended, requiring a site investigation and a scheme to deal with contamination including a remediation method statement. The Council's contamination officer's full comments can be found above in the Internal Consultee section.

On this basis, it is considered that the impact of the development on ground contamination can be mitigated in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan Part 2: Development Management Policies (2020) and Policy 5.21 of the London Plan (2016).

7.07 Impact on the character & appearance of the area

Paragraph 127 of the NPPF (February 2019) states that planning decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Policies D1 and D4 of the draft London Plan - Intend to Publish (December 2019) states that development design should respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions and be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well. Developments should also aim for high sustainability standards and also respect, enhance and utilise the heritage assets and architectural features that make up the local character. Proposals should provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water. Development should achieve comfortable and inviting environments both inside and outside buildings.

Policy DMHB 10 (High buildings and structures) of the Local Plan: Part 2 - Development Management Policies (2020) says that proposals for high buildings or structures will be required to respond to the local dominant context and should (amongst other things):

- i) be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings; and
- ii) be located in an area of high public transport accessibility and be fully accessible for all

users; and

iii) be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context.

Paragraph 3.9.3 of the draft London Plan - Intend to Publish (December 2019) states that tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. The proposed development is considered to constitute a tall building as it is substantially taller than its surroundings of 2/3 storey development.

The proposed tall buildings are considered to be contrary to the above policy in that they would not be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for a high building and would be located in an area with a low PTAL (Level 2-3) and would also be of a height, form, massing and footprint which is considered to be out of proportion to its location, adjacent buildings and the wider townscape context.

For these reasons the site is not considered an appropriate location for tall buildings and allowing tall buildings in this location would be contrary to Policy DMHB 10 (High buildings and structures) of the Local Plan: Part 2 - Development Management Policies (2020), policy BE1 of the Local Plan Part 1 (2012), policies 7.6 and 7.7 of the London Plan (2016) and policies D1, D4 and D9 of the draft London Plan - Intend to Publish (December 2019) and the NPPF.

Policy DMHB 11 (Design of new development) of the Local Plan: Part 2 - Development Management Policies (2020) says (amongst other things) that development will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.

Policy 7.4 of the London Plan (2016) says that buildings, streets and open spaces should provide a high quality design response that:

- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- e) is informed by the surrounding historic environment

Hillingdon Circus comprises predominantly 2/3 storey buildings with commercial uses on the ground floor fronting Long lane and residential uses above. The wider area to the north and south is characterised by two storey houses. To the west there are some three storey

flats (Aurial Drive) with one new development at Hercies road which has a fourth storey set back from the road. The area is suburban in character with open land to the north of the site on the other side of the M40 and open space to the east at Freezeland Way.

The proposed development at 11 storeys is considered to be out of keeping with the existing scale and suburban character and as it greatly exceeds the height, scale and massing of locality, the development would be incongruous within the townscape setting and also the wider landscape surroundings. This is contrary to Policy DMHB 11 (Design of new development) of the Local Plan: Part 2 - Development Management Policies (2020).

For the reasons set out above, the proposed development does not represent an appropriate scheme that integrates with the existing surrounding area contrary to policy 7.4 of the London Plan (2016).

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.

The scheme proposes a 150m continuous 'wall' of development along the perimeter to the north which then wraps around to the west along Long Lane for a further 30m. There is a change in levels along the northern portion of the site at its boundary with Long Lane and no pedestrian or vehicular links are proposed here. To the southeast of the site is a parcel of land which is not in the Applicants' control and so no links are proposed here. This results in an 'island' type development which would be segregated from the wider area.

Although it is acknowledged that the development has been designed to reduce the impact on the proposed residential units of the prevailing hostile noise and air quality environments around the A40. The resultant continuous ribbon of development, comprising Blocks 5, 6, 7, 8, & 9 which includes the taller buildings, with no breaks is considered to have significant detrimental visual impact on the locality and also wider views. Furthermore, the development has failed to demonstrate that it is acceptable in terms of noise and air quality (as discussed in more detail in the relevant sections).

The outer walls of the development would rise up dramatically above the existing buildings in the locality to the extent that they would appear completely out of scale. The presence of the 11 storey tower block, contributes to a development that would completely overwhelm its immediate surroundings. The siting of the buildings close to the boundaries is expected to compound the impact of the development and the potential harsh canyon like pedestrian environment at ground level.

In addition, the lack of landscaping around the perimeter of the site, primarily the northern and western boundaries compounds the impact of the scale of this development in wider views around the site. The development has maximised the extent of site coverage to the detriment of providing any real relief or setbacks to provide higher quality landscaping to minimise the harm caused by the proposed development on the local and wider street scene and views of the site.

Overall, it is considered that the development, by virtue of its overall scale, height, bulk and massing, density, site coverage and lack of landscaping and screening, constitutes an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of

the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the adjoining Green Belt and would mar the skyline, contrary to Policies BE1 and EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMHB 10, DMHB 11, DMHB 12, DMHB 14, DMHB 17, DMEI 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part Two - Site Allocations and Designations (2020), Policies 7.4, 7.6, 7.7 of the London Plan (2016), Policies D1, D3, D4, D8 and D9 of the London Plan (Intend to Publish version 2019) and the NPPF (2019).

7.08 Impact on neighbours

Policy DMHB 10 (High Buildings and Structures) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) states that proposals for high buildings should (amongst other things) not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces and should be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities. This is supported by Policy 7.7 of the London Plan (March 2016) and Policy D8 of the draft London Plan - Intend to Publish (December 2019).

In this case there are no residential properties that directly abut the site. The nearest residential properties are in Freezeland Way on the opposite side of the road. Buildings 1, 10 and 12 are the closest buildings and would maintain a separation distance of least 38 metres from the existing properties on the south side of Freezeland Way. It is not considered that there would be a material loss of daylight or sunlight to neighbouring properties, as the proposed buildings would be sited a sufficient distance away from adjoining properties.

Privacy

The supporting text for Policy DMHB 11 (Design of New Development) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) states that the Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary.

The nearest residential properties are in Freezeland Way on the opposite side of the road, which are at least 38m from the proposed development. It is considered that the relevant minimum overlooking distances can be achieved, as the proposed building would be sited a sufficient distance away from adjoining properties. In addition, boundary treatment is could be secured by condition.

It is not therefore considered that the proposal would result in a loss of residential amenity to the nearest existing residential occupiers, in compliance with the relevant sections of Policy DMHB 11 and Appendix A of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

It should be noted that the southernmost block (Building 12) has been set back 13m from the southern boundary of the application site (adjacent to the Council owned land to the south). Should a similar residential development on the Council land be forthcoming, with a

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

In summary the proposed development is not expected to have an adverse impact on the existing residential amenity of surrounding properties with regards to overlooking, privacy, daylight or sunlight. An assessment of the quality of the proposed residential units is set out below in the relevant section (Living conditions for future occupiers).

7.09 Living conditions for future occupiers

EXTERNAL AMENITY SPACE

Policy DMHB 18 (Private Outdoor Amenity Space) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all new residential development to provide good quality and usable private amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.2 which are as follows:

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

1 bedroom house - 40 sqm per house
2 bedroom house - 60 sqm per house
3 bedroom house - 100 sqm per house

Given the current proposed unit mix, a total of 12,130 sqm of private amenity space is required to meet the requirements of Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) through private balconies, private gardens and communal amenity space for the use of residents only.

The proposed development provides 493 sqm of private amenity in the form of ground floor amenity and roof terraces and would provide a further 3,162 sqm of private amenity space in the form of balconies/internal amenity. Podium level space (communal) equates to 2821 sqm. Therefore the total private amenity space provision would be 6,476 sqm. This is below the 12,130 sqm of private amenity space required by Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the application is recommended for refusal on this basis.

Policy DMHB 18 (Private Outdoor Amenity Space) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) also specifies that private balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres and that ground floor units should have defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room.

In this regard all of the proposed balconies comply with these space standards. 26 of the 27 ground floor units have a private terrace/garden area and 20 of these have a clear 3m of defensible space in line with the standards set out above. The remaining six units are located in areas where the defensible space could be increased to 3m. Although this has not been made clear on the submitted drawings, it is considered to be something that could be secured and resolved by way of condition.

34 units out of 514 units do not have a private balcony or terrace. Paragraphs 2.3.32 -

2.3.33 of the Mayor's Housing SPG (2016) does allow, in exceptional circumstances for some developments to provide a proportion of dwellings that cannot provide private amenity space to provide those dwellings with additional internal living space equivalent to the required amenity space, In other words, balconies have been replaced with bigger lounges. The proposed development has achieved this in all units which have not provided a private balcony or terrace area.

In summary, given the lack of private amenity space, the proposed development fails to meet the requirements of policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and is therefore recommended for refusal on this basis.

PUBLIC OPEN SPACE

Policy G4 of the draft London Plan (December 2019) states that development proposals should:

- 1) not result in the loss of protected open spaces
- 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency

Policy DMCI 4 (Open Spaces in New Development) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) encourages proposals for major new residential development to make provision for new open space, or enhancements to existing open space and says that proposals that fail to do will be resisted. In this regard the Applicant states that 9,779 sqm of public amenity space is provided. The public open space would be provided in the following main areas:

Central Parkland = 1907 sqm

Natural edge (between Buildings 11 and 12) = 1332 sqm

Main arrival square = 1573 sqm

The quality and quantity of the proposed public open space proposed within the development is considered to provide new open space which would be of benefit to the existing and future residents of the site and surrounding area. The proposed public open space accords with Policy G4 of the draft London Plan (December 2019) and Policy DMCI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

CHILDREN'S PLAY SPACE

Policy DMHB 19 (Play Space) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all developments which result in an occupancy of ten or more children to provide children and young people's play facilities on-site.

Using the 'SPG play space requirement calculator' which allocates a GLA benchmark of 10 sqm of dedicated play space per child, a total of 2,285 sqm play space is required. The proposed development provides the following dedicated play space in accordance with the SPG.

Total play area = 2,285 sqm

0 - 5 dedicated formal / informal play area = 1,156 sqm

5 - 11 dedicated formal / informal play area = 700 sqm

12+ informal play space = 429 sqm

Based on the above figures, the proposed development is considered to provide policy compliant children's play spaces in accordance with policies DMHB 19 of the Local Plan Part 2 (2020) and the GLA Children's Play Space SPG.

INTERNAL SPACE STANDARDS

Policy 3.5 of the London Plan requires new development to be of the highest quality both internally and externally. Table 3.3 of the London Plan, together with the Mayor's Housing Standards and National Space Standards set out the internal size requirements for residential accommodation. Policy DMHB 16 (Housing Standards) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) reiterates these space standards.

The Schedule of Accommodation demonstrates that:

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

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

It is therefore considered that the information in the submitted plans and documentation, including the planning statement and design and access statement illustrate that standards have been achieved, in accordance with London Plan Policies 3.5 and Policy DMHB 16 (Housing Standards) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

PRIVACY AND OUTLOOK

DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) set out design guidance with regard to new and existing development. The guide says that a minimum separation distance of 21 metres is required to avoid overlooking and loss of privacy.

The separation distances of buildings within the site are 21m in all cases with the exception of Building 10 with Building 11 to the east and Building 10 with Building 12 to the east. Here the distance is 15m which is deemed acceptable as Building 10 faces the side elevation of buildings 11 and 12.

The application submission has also demonstrated that there are adequate set backs provided (a minimum of 13m from the main facade at Building 12) along the southernmost boundary of the application site, where it adjoins the remaining land parcel within site B to ensure that this site could come forward in isolation without being prejudiced by the current proposals.

It is therefore been considered that the design of the development would protect the privacy of future occupiers, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

DAYLIGHT AND SUNLIGHT

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says that the Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

Policy DMHB 11 (Design of New Development) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) seeks to protect the amenity, daylight and sunlight of existing properties and open space. Policy DMHB 10 (High Buildings and Structures) of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) says that proposals for high buildings should (amongst other things) not adversely impact on the micro climate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces and should be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities.

Draft policy D6 of the London Plan (Intend to Publish (Dec 2019)) states that development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

In this regard a (Robinson) Daylight and Sunlight Assessment has been submitted as part of the application. The report has been assessed by external consultants (LSH) on behalf of the Council and the Applicant was given the opportunity to respond. The Applicant's response was subject to further review by external consultants (LSH).

The assessment and review considered that the development would not have an adverse impact on nearby properties in terms of overshadowing as a result the proposed development and the proposal is considered acceptable in this regard.

The assessment also reviewed the expected levels of Daylight and Sunlight within the proposed development. In summary the review carried out by external consultants on behalf of the Council provided the following conclusions:

Window Transmittance and Surface Reflectance

The main issue with the values used in the Assessment relate to the chosen glazing system being high end glazing units. If this type of glazing is used within the development, then the results for daylight will be as per the Robinson report. However, if high end glazing units are not used in the development, then the results would be more detrimental to daylight results. A condition requiring the high end glazing units should therefore be applied to ensure the daylight results are achieved.

Furthermore, it is noted that kitchens have not been assessed which is expected to improve the overall result in terms of Daylight received. The BRE guidance states (2.1.14) non-daylit kitchens should be avoided where ever possible.

The Robinson analysis shows that 310 of the rooms fall short of the target values, of these, 224 are bedrooms. The BRE guidance recognises that daylight is less important in bedrooms. However there is an additional 86 rooms which fall short of acceptable levels.

Overall the results of the Daylight and Sunlight Assessment are concerning and reinforce Officer's views that the proposed development would result in an overdeveloped site to the detriment of future residents.

Sunlight

In terms of Sunlight, the Robinson report has analysed Sunlight using room results rather than windows (for APSH). Using windows would be in line with the BRE guidance and RICS guidance note. Using room results would be more favourable than window results.

The Robinson response states that this method was accepted by Hillingdon in the previous application. However, it is considered that each application should be assessed on a case by case basis and in this regard the assessment should be carried out in accordance with the BRE guidance and RICS guidance note. Insufficient information has therefore been provided with regards to the Sunlight assessment.

In summary, the Applicant has failed to demonstrate that the proposed development would provide adequate levels of Daylight and Sunlight to the detriment of the future residential amenity contrary to policies DMHB 10 and DMHB 11 and Paragraph 5.41 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and draft policy D6 of the London Plan (Intend to publish (Dec 2019)).

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Section 9 of the NPPF says that plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people; and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The NPPF also says that developments should be located and designed where practical to give priority to pedestrian and cycle movements; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.

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

Policy DMT 1 (Managing Transport Impacts) of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. Policy DMT 2 (Highways Impacts) of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) seeks to minimise the impact on the surrounding highway with regards of traffic, air quality, noise, local amenity and safety. Policy DMT 6 (Vehicle Parking) of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) says that development proposals must comply with the parking standards outlined in Appendix C Table 1. 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. In this regard a Transport Assessment (TA) has been submitted in support of this application.

Policy 6.13 of the London Plans says that the maximum standards set out in Table 6.2 should be the basis for considering planning applications, informed by policy and guidance below on their application for housing in parts of Outer London with low public transport

- accessibility (generally PTALs 0-1). In addition, developments in all parts of London must:
- a ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
 - b provide parking for disabled people in line with Table 6.2
 - c meet the minimum cycle parking standards set out in Table 6.3
 - d provide for the needs of businesses for delivery and servicing.

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

RESIDENTIAL DEVELOPMENT-PARKING

The 514 residential unit component of the application consists of the following:-

- 221 - 1 bedroom flats
- 216 - 2 bedroom flats
- 77 - 3 bedroom flats

The site has a Public Transport Accessibility Level (PTAL) of both 2 and 3 where 6 is high. Table 6.2 of the London Plan sets a maximum car parking standard of 1.5 space per unit for developments within areas with a PTAL rating of between 2 and 4. The supporting text to Policy 6.13 of the London Plans says that 'In outer London a more flexible approach for applications may also be acceptable in some limited parts of areas within PTAL 2, in locations where the orientation or levels of public transport mean that a development is particularly dependent on car travel'. This part of Hillingdon is considered to require higher levels of car parking given the likely trips and destinations in the context of the limited public transport options.

The Council's Highways Team have been consulted on the proposed parking provision and have noted that a total of 154 on-plot residential spaces are proposed which equates to a ratio of between 0.3-0.36 spaces per dwelling which are arranged at surface and with the podiums across the site.

It is acknowledged that the Greater London Authority (GLA) have accepted a ratio ranging from approximately 0.3-0.36 per flatted unit. However this unprecedented low parking ratio would normally be considered for areas akin to more sustainable main or 'edge of' town centre locations which are better placed to accommodate such a lower level of provision.

Utilising the Hillingdon Local Plan standards, the recommended maximum quantum would be in the region of 591 spaces. However in the spirit of compromise between the regional and local parking standards and LBH advice afforded at the pre-application stages for the aforementioned prior applications including the current iteration, encouraged a 1:1 parking ratio per unit which would equate to 514 spaces. This would assist in limiting undue and detrimental parking displacement onto the local highway network.

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

collation of census data in 2011. The private motor vehicle would therefore be likely to remain as the main dominant mode of travel choice for many new residents by reason of need and convenience for the foreseeable future.

Notwithstanding the above and as highlighted earlier, the need to encourage sustainable modal travel choice is acknowledged on a local, regional and national level hence in the spirit of compromise between the regional London Plan and local Hillingdon parking standards, an on-plot parking ratio between 0.75-1 space per dwelling in lieu of the proposed average 0.3 per unit ratio could be favoured.

The proposed total quantum of 164 spaces (including residential, disabled compliant, visitor and car club provisions) is considered unacceptable as there would be a heightened potential for detrimental parking displacement onto the highway network.

The current application proposes to provide 4 car club spaces to serve the location with 3 years free membership to be provided for each dwelling upon first occupation. Whilst the delivery of car club spaces on site is welcomed, the success of car clubs within the LB Hillingdon has not been of great success in recent years. The Council has seen numerous applications to remove planning obligations which sought to secure car club bays in large scale developments, primarily because car club operators failed to occupy the spaces secured on site. The likely success of car club bays can therefore only be treated as a minimal benefit based on the most recent experience of the Local Authority.

Were all other matters deemed to be acceptable, the delivery of car clubs would have been secured as a planning obligation, albeit the Local Planning Authority do not agree with the applicants claims that each car club bay could replace 20 privately owned vehicles. A more realistic assumption would be that, should a car club operator take the spaces, each bay is only likely to replace the minimum 6 privately owned vehicles.

Electric Vehicle Charging Points (EVCP's) are proposed on site at a ratio of 20% active and 80% passive spaces, which accords with the emerging London Plan policy T6.1 (intend to Publish Version 2019) and is supported and could be secured by way of a planning condition.

In line with draft London Plan standards, the application proposes a provision of 918 secure and accessible spaces in total for residents and visitors located throughout the site, including within a 'cycle hub,' which is acceptable in format and design layout terms and the quantum conforms to and exceeds Hillingdon's Local Plan policy DMT 5 standard which would require a figure in the region of approximately 591 spaces.

Whilst the quantum of cycle parking far exceeds the LBH standards, the provision does accord with the draft London Plan standards and is therefore deemed to be acceptable. It is considered that a cycle parking review. This matter could be secured by condition to acquire secure and covered cycle parking on-site. The development also proposes 8 motorcycle spaces on site which also accords with the Councils standards and could again be secured by condition.

COMMERCIAL USES; PARKING (Use Class B1/A1/A3/D1)

The applicant is proposing a zero parking provision for the flexible commercial elements which would total an overall scale of 1214 sqm GIFA. In accord the Local Plan a total of up to 48 spaces would normally be required for this level of scale with a suitably apportioned

GIFA. The applicants claim that, demand will be very local to the development and public transport/pedestrian based which includes patronage by new occupiers of the address. Hence car borne demand is predicted to be relatively low to non-existent. On this premise the proposals includes no parking provision for the 'commercial' component. Policy E5 of the Hillingdon Local Plan Part 1 (2012) does state that an appropriate level of parking provision should be provided to ensure adequate accessibility to local services and amenity. Failure to provide adequate parking is likely to prejudice the vitality and viability of the proposed commercial units. Even if the Council were to accept the applicant's provision, given the isolated nature of the site and the need to travel to the premises by private car, the proposals are likely to further exacerbate overflow parking on the local roads to the detriment of pedestrian and highway safety.

The Local Planning Authority accept that the proposed development would in theory leave 6 generic visitor spaces which could be used by visitors to the commercial premises, however these spaces are allocated to visitors of the residential properties which may be occupied by visitors 100% of the time, given the scale of this development of over 500 units. The management of these spaces to be shared by visitors to the residential and commercial premises would be difficult to impose and highly unlikely to be enforceable by the Local Planning Authority. The lack of commercial parking therefore fails to accord with policy E5 of the Local Plan Part 1 (2012) and policy DMT 6 of the Local Plan Part 2- Development Management Policies 2020.

The proposed development includes provision of 8 long stay & 32 short stay spaces for the 'flexible' B1/A1/A3/B1 uses. Whilst this is marginally below the LBH parking standards, the proposals do meet the London Plan standards and are therefore deemed to be acceptable and could have been secured by way of a planning condition.

Notwithstanding the Councils position with regard to insufficient provision of on-site car parking for both the residential and commercial premises, the applicants have proposed to impose a privately imposed parking management strategy which is welcomed and supported, however full and clear detailed information with regards to the enforcement of this would need to set out and approved by the Planning department. However the Councils concerns of indiscriminate parking extend beyond the application site boundary and are likely to cause harm on surrounding adopted roads. Whilst the Planning department consider it to be essential to secure, as part of the legal agreement, a clause to prevent future residents and businesses securing a council parking permit to park on the local highway. However the restrictions on these local roads do not prevent car parking outside of the controlled hours and it is this indiscriminate parking that is deemed to cause pedestrian and highways safety concerns.

Whilst the Highways Officers have requested a contribution of £20,000 for contingency, which would be used to mitigate any harm identified, this contribution would not overcome the primary reasons for refusal.

Traffic Modelling Outcomes

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

Furthermore, the Applicant estimates HGV movements generated by the HS2 construction (commencing from autumn 2020) at approximately 18 HGV's per day to traverse through Hillingdon circus with an imposition of 3 vehicles during the am & pm peak hours. Although it is anticipated that there will be peaks and troughs in HS2 linked construction activities, the official estimation by HS2 Ltd of, for example, HGV activity linked only to the new portal at the Ruislip Golf course located further north of the MB site in Ickenham Road is officially anticipated at 120-140 daily two-way trips within HS2's 'main works' Local Traffic Management Plan. It is expected that a high proportion of these vehicles would route through Hillingdon Circus and as HS2 Ltd cannot guarantee avoidance of peak traffic periods this would infer a significant under-estimation by the applicant.

General HS2 Ltd activity generated by other work sites in the borough would also add measurable burden to the junction during and outside of peak traffic periods well into the second half of the next decade. It is therefore considered that the 'real world' level of imposition would add significant traffic burden which is especially concerning in the light of the signalled junction running at/beyond working capacity during peaks at present. The applicant has not factored this aspect into their analysis on the premise of identified traffic reduction measured in 2019 which would therefore absorb HS2 Ltd activity. This is not considered as an acceptable course of analysis.

Traffic generation

In traffic impact terms, the acceptability (or otherwise) of a development proposal is summarised within Paragraph 109 of the NPPF which states "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". This approach has therefore been applied by the Highways Engineer throughout his comments.

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

In summary, unless substantive highway mitigation and highway gain can be achieved, the proposal is considered unacceptable on traffic generation grounds. The applicant has indicated willingness in providing some highway enhancement/financial contribution in an attempt to mitigate development impacts mainly focused on improving the pedestrian environment, public transport facilities together with highway improvements related to improving site access and egress. However, the Local Planning Authority consider that the applicants failure to provide an accurate TA does not allow for a full assessment of the potential impacts and thus it is not possible to ascertain if mitigation is required.

The application fails to demonstrate that the proposal would not result in an unacceptable rise in traffic around the application site causing severe impacts to the free flow of traffic as well as to highway and pedestrian safety. This overall conclusion falls in line with Para. 109 of the NPPF in specific regard to the appropriateness of refusing development based on the residual cumulative impacts on the road network which, in this case, are considered severe.

Development Footfall

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

proposal. The applicant has not provided this audit however a study was previously submitted for the refused 437 unit scheme which indicated 64/49 additional pedestrian movements are predicted for the am & pm peaks respectively. Clearly with the uplift in unit numbers from 437 to 514 this prediction would increase. However the original numbers were considered as a gross underestimation given that the overall proposal could potentially house somewhere in the region of 1000 new residents. Notwithstanding this point, as is the norm, pedestrian footfall would cumulatively increase and be distributed throughout the day and evening periods so any projected footfall uplift, whether it be at peak or any other time of the day, would impinge on the public realm creating additional demand on the public realm i.e. footway and road crossing infrastructure.

The Highways Engineer has identified some physical deficiencies within the existing footway network and pedestrian provisions at Hillingdon Circus. However in the absence of information submitted for this application, it is not known what potential mitigation is required to secure pedestrian improvements to the public realm.

PUBLIC TRANSPORT

TfL have identified the need for a new bus service which runs north to south in the Borough. As such a contribution of £1,365,000 for this bus route has been requested, which the applicants have agreed to provide. In addition, a contribution of £30,000 towards bus priority measures has been requested and agreed by the Applicant. It should be noted however that the Local Planning Authority do not deem the above contributions to be sufficient to address or mitigate the objections raised earlier in this report.

CONCLUSION

In conclusion, the proposed development cannot be supported due to its impact on highway and pedestrian safety and the free flow of traffic.

It is noted that a number of mitigation measures have been identified by the Council's Highways engineer and also TfL, however it is not known, due to a lack of information, whether the mitigation proposed, either individually or cumulatively could in fact mitigate against any harm, as the applicant has failed to provide such information.

In the event that this application were approved by a future planning inspector, it is however considered imperative to secure the following works which could go some way to alleviating harm caused by the development, however this list of obligations does not preclude the position that this development is unacceptable.

A s278 and/or s38 agreement will be entered into to address any and all on site and off site highways works as a result of this proposal. These include the following:

- Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities
- Improved pedestrian and cycling facilities throughout the signalled junction.
- Potential improvements to the service road approach in Freezeland Way (fronting the site).
- The creation of a new public realm 'Gateway' fronting the site on Freezeland Way.
- Enhanced bus stop provisions for the 'Oxford Tube' bus service,
- Monitoring of signal optimisation @ Hillingdon Circus,
- Contingency monies to remedy any parking displacement onto the public highway (£20,000),
- Review of local public lighting, road signage and marking provisions,
- Carriageway (including roadway anti-skid review) and footway condition surveys with

remedial work where applicable.

- Implementation of vehicle actuated speed signs (up to a cost of £5,000).

(ii). Public Transport Infrastructure:

A 5 year public transport contribution toward a new bus service (£455,000 per annum totalling £1,365,000).

Bus priority measures (£30,000)

(iii). Travel Plan initiatives/incentives with a financial performance bond (£20,000)

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

7.11 Urban design, access and security

In terms of urban design, Policies 7.4, 7.5, 7.6 and 7.7 of the London Plan (March 2016), Policies D1 and D2 of the draft London Plan - Intend to Publish (December 2019), Policies DMHB 1, DMHB 10, DMHB 11, DMHB 12, DMHB 13, DMHB 13A, DMHB 14, DMHB 15, DMHB 17, DMEI 1, DMCI 2, DMCI 3, DMCI 4, DMCI 5 and Appendix A of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) and Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) and Site specific policy SA14 of the Local Plan: Part 2 -Site Allocations and Designations (2020) are considered relevant.

Issues relating to impact on the Green Belt, heritage assets and character of the area have been dealt with above in the relevant sections of this report, where it was concluded that the proposal, due to height, scale, mass and siting would be completely out of character and context with the immediate area and is therefore not appropriate in this location.

It is acknowledged that the present open and degraded site detracts from Hillingdon Circus's function as local shopping and that the site is in need of an appropriate scheme of redevelopment, bringing regeneration, vibrancy and improvements to the townscape of North Hillingdon, as recognised in the Local Plan. However, any development needs to be integrated in a way that brings environmental improvements to the whole area and not merely the site itself.

As stated elsewhere in this report, the current scheme is substantially more dense than any previous scheme proposed on the site and Officers considers that the impact of development is overbearing and incongruent within it's townscape surroundings and landscape setting.

The scheme proposes a continuous ribbon of development along the perimeter to the north and west. It is acknowledged that this is designed to reduce the impact of the prevailing hostile noise and air quality environments on the proposed residential uses within the site. However, it is considered that this aspect of the proposal, which includes the 11 storey tower block, would appear completely out of scale and overbearing and would completely overwhelm its immediate surroundings. Furthermore, the proposed development has failed to demonstrate that it could overcome issues relating to Air Quality and Noise (as discussed in more detail in the relevant section of this report).

The Councils Urban Design officer has been consulted on the application and has made the following observations:

The proposed development has a coarse grain comprising large flatted blocks which are at odds with the surrounding townscape which has a much finer grain of modest 2 and 3 storey houses and shops which create a strong suburban character with open space.

Notwithstanding the objections already raised to the inappropriateness of the development's height, bulk and mass to the suburban character of the area, the layout of the buildings and separation distances between the blocks appear to be acceptable on a scheme of this size but as stated previously would be more appropriate in an urban setting with development of a similar height, bulk and mass rather than this suburban setting adjacent to the green belt.

The proposed roof forms comprise flat roofs with parapets, gable ends, mansard elements and set back storeys to provide visual interest. The parapet roofs and gable ends loosely reflect the established roofscape, albeit on a much larger scale, but the introduction of mansard roofs with sheet cladding would be incongruous. These elements would be particularly prominent given the proposed height of the buildings and would draw undue attention and detract from the area.

Notwithstanding the concerns of the height bulk and mass of the development. The detailed design of the facades (see also comments with respect to materials) is generally considered acceptable and well considered. There are some reservations with respect to the rounded arches to the ground floor of the 'Focal Building' to Hillingdon Circus which does not sit comfortably with the architectural language of the floors above.

The development proposes streets and public spaces that are well planted and incorporate a hierarchy of materials for the hard landscaping with shared surfaces which would be complementary and appropriate for the site.

The proposed construction materials for the majority of the blocks have contrasting brickwork with bands of reconstituted stone to accentuate different parts of the facade and is considered acceptable in principle. This would be dependent on appropriate brick, bonding, mortar and stone being chosen to respect the local palette of materials. There are concerns with the use of a green brick to the Park Pavilions as the visualisations suggest that this would be glazed brick. This could draw undue attention and appear incongruous within this sensitive location close to the green belt and would be in stark contrast to the more traditional palette of materials of the established suburban development in the area.

The Local Planning Authority has tried to actively engage with the Applicant at the pre-application stage in order to achieve an acceptable outcome. The quantum of development has remained a key issue and the Applicant has chosen to proceed without making any amendments to the scheme. The proposed development is therefore considered to be contrary to Policies DMHB 1, DMHB 10, DMHB 11, DMHB 12, DMHB 13, DMHB 13A, DMHB 14, DMHB 15, DMHB 17, DMEI 1, DMCI 2, DMCI 3, DMCI 4, DMCI 5 and Appendix A of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) and Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) are considered relevant and Site specific policy SA14 of the Local Plan: Part 2 -Site Allocations and Destinations (2020). For the reasons set out above, the application is recommended for refusal on design grounds.

SECURITY

Policy DMHB 15 (Planning for Safer Places) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) seeks to ensure all new development are safe and attractive public and private spaces and promotes Secured by Design principles. This is supported by Policy 7.3 of the London Plan (March 2016) and Policy D10 of the draft London Plan - Intend to Publish (December 2019).

The Metropolitan Police Crime Prevention Officer has been consulted on the application and considers that achieving Secured By Design accreditation is achievable on the site. The Metropolitan Police Crime Prevention Officer has requested that any permission be subject to conditions requiring further details of the how the development would achieve full Secured by Design Accreditation. The Metropolitan Police Crime Prevention Officer's full response is set out above in the External Consultations section.

7.12 Disabled access

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

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

Policy 3.5, 3.8 and 7.2 of the London Plan (2016), Policy D5 of the draft London Plan - Intend to Publish (December 2019), the Mayor of London's Housing Standards, Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the Accessible Hillingdon Supplementary Planning Document (September 2017) require that all residential units are built in accordance with Part M4(2) of the Building Regulations 2010 (2015 Edition) and that 10% of the units be designed and constructed in accordance with Part M4(3) of the Building Regulations 2010 (2015 Edition). In the event of an approval, appropriately worded conditions could be attached to any consent, to ensure compliance with these standards.

The Council's Access officer has been consulted on the application and initially raised a number of concerns (set out in full above in the Internal Consultees section). Following review of further information relating to the proposed M4(3) Wheelchair Accessible/Wheelchair Adaptable dwellings the Council's Access officer confirmed that the original accessibility concerns had been addressed. However, a number of concerns relating to the external environment remained outstanding. In this regard the Council's Access officer considered these remaining issues could be addressed via planning conditions should permission be granted. The suggested conditions are set out in full above in the Internal Consultees section.

For the reasons set out above, it is considered that subject to suitably worded conditions, the proposed development could be in accordance with The Equality Act 2010 and with Policy 3.5, 3.8 and 7.2 of the London Plan (2016), Policy D5 of the draft London Plan - Intend to Publish (December 2019), the Mayor of London's Housing Standards, Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the Accessible Hillingdon Supplementary Planning Document (September 2017).

7.13 Provision of affordable & special needs housing

The London Plan (2016) Policies 3.10-3.13 require Boroughs to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes, having regard to their affordable housing targets. The Local Plan: Part 1 (2012) Policy H2 requires sites with a capacity of 10 or more units to provide an affordable housing mix which reflects housing needs in the borough. The Local Plan: Part 2 (2020) Policy DMH 7 outlines that subject to viability, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split 70% Social/Affordable Rent and 30% Intermediate.

The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017) and Intend to Publish Version of the London Plan (2019) have established the threshold approach to affordable housing applications. Where proposals meet or exceed the relevant threshold level and are consistent with the relevant tenure split, a Financial Viability Appraisal (FVA) is therefore not required, subject to the applicant confirming they have sought grant funding to increase the level of affordable housing. Draft Policy H6 of the London Plan (Intend to Publish Version (Dec 2019)) outlines that a minimum of 30% of the affordable housing should be intermediate, a minimum of 30% should be social/affordable rent and the remaining 40% is to be determined by the Council. In line with the Local Plan: Part 2 (2020) Policy DMH 7, this 40% should also be social/affordable rent. It should be noted however that it may not be possible to achieve this tenure split exactly and therefore nominal variations will need to be accepted.

The proposed development would provide a total of 514 units within 1398 Habitable rooms split as below:

Intermediate (shared ownership) = 61 units (33.5% of affordable units)
Affordable Rent (London Affordable Rent) = 121 units (66.5% of affordable units)
Total affordable = 182 units (35.4% of all units)

Intermediate (shared ownership) = 149 habitable rooms (10% of all habitable rooms)
Affordable Rent (London Affordable Rent) = 343 habitable rooms (25% of all habitable rooms)
Total affordable = 492 habitable rooms (35% of all habitable rooms)

The development therefore proposes 35.4% affordable housing with a tenure split of 33.5% (Intermediate (shared ownership) / 66.5% (London Affordable Rent) which is policy compliant.

Market (Total of 332 split into 134 x 1 bed, 154 x 2 bed, 44 x 3 bed)
Affordable (Intermediate (shared ownership) (Total of 61 units split into 34 x 1 bed, 27 x 2 bed)
Affordable (London Affordable Rent) (Total of 121 units split into 53 x 1 bed, 35 x 2 bed, 33 x 3 bed)

The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017) and Intend to Publish Version of the London Plan (2019) outlines that the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes.

The level of affordable housing therefore complies with the adopted Development Plan. It also complies with the threshold approach to applications set out in the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017) and Intend to Publish Version of the London Plan (2019), subject to the applicant confirming they have sought grant funding to increase the level of affordable housing.

Accordingly, the proposal would make provision for a level of affordable housing which is appropriate subject to a signed legal agreement to secure this provision.

7.14 Trees, landscaping and Ecology

TREES AND LANDSCAPING

Policy EM4 (Open Space and Informal Recreation) of the Local Plan: Part 1 - Strategic

Policies (2012) says that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities. The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says (amongst other things) that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit and that development proposals will be required to provide a landscape scheme. The policy also seeks to protect existing trees through tree root protection areas and an arboricultural method statement where appropriate. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

Site specific Policy SA 14 of the Hillingdon Local Plan: Part 2 - Strategic Policies (2012) says that developments in this location should (amongst other things) secure substantial planting and landscaping in association with any development and provide environmental improvements and landscaping as necessary to enhance the local shopping and residential environment; and

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

The site is covered by TPO 6, however, there are no protected trees remaining on the master Brewer site. Two oaks T7 and T9 survive on the Council-owned land in the south-east (this lies outside of the application site). The site lies within Hillingdon's Landscape Character Area G3: Yeading Brook River Corridor. Since the previous applications, the site has largely been cleared. As a result of the site clearance, any boundary screening is now heavily reliant on off-site, or 'borrowed' tree cover which lies outside the control of the developer.

Remaining tree cover includes the wooded road embankment alongside Long Lane (west boundary), tree and shrub cover at the top of the retaining wall adjacent to the A40 (north), the mixed woodland on the Council-owned land (south-east corner) and the part-wooded Green Belt land of Freezeland Covert to the east.

Since the previous applications, the current developer now owns the plot of land adjacent to the east boundary which will facilitate both visual and physical connectivity between the site and the public open space to the east.

Following concerns raised with regard to the imposing nature of the proposals along the western boundary of the site on Long Lane, additional tree planting has been proposed in this area, however, it is limited in its extent due to the proposed building line and is not

considered to provide a sufficient buffer to the proposed development.

More recently the large Weeping willow at the site entrance has suffered from the collapse of a major limb and will be removed by the Council. - This work is essential for reasons of safety and sound arboricultural management. Although the tree is not protected by TPO, it is a prominent feature and local landmark, and had been identified for retention in the proposed development.

The tree loss on the proposed development is significant, with much of the tree removal already implemented. As previously noted the quantum of loss was previously accepted by the Council, as part of the approved scheme at the site and importantly, no protected trees will be removed to facilitate the development.

The open spaces and landscape proposals within the site appear to be an improvement on the previous schemes, albeit the potential adverse effects on daylight and microclimate are not known.

The acquisition of the plot of Green Belt land to the east is, potentially, a significant benefit to the scheme and presents new opportunities to improve both the visual and physical connections to the Green Belt.

In summary, the tree and Landscape Officer considered that the application could be deemed acceptable subject to suitable conditions and a financial contribution towards the enhancement of the Freezeland Covert to the east. Full details of the suggested conditions are set out in the Internal Consultee section above. The proposed ecological works comprised of ecological enhancements off site, alongside significant additional tree planting works to screen views of the site when viewed from the East.

ECOLOGY

Paragraph 170 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes and sites of biodiversity;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and
- 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.

This is supported by Policy 7.19 of the London Plan (March 2016) and Policy G6 of the draft London Plan - Intend to Publish (December 2019).

Policy EM4 (Open Space and Informal Recreation) of the Local Plan: Part 1 - Strategic Policies (2012) says that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through

an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities. The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.

Policy EM7 (Biodiversity and Geological conservation) of the Local Plan: Part 1 - Strategic Policies (2012) seeks the protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plan and will (amongst other things) seek the provision of biodiversity improvements from all development, where feasible. This is further reiterated by Policy DMEI 7 of the Local Plan Part 2; Development Management Policies (2020).

An Ecology report has been submitted in support of this application which identifies that the proposals do not accord with planning policy requirements in delivering no net loss of ecological value. The Council's Ecology Officer has been consulted on the proposals and has raised no objections to the proposed development subject to two pre-commencement conditions and an offsite contribution for land to the east to mitigate the identified impacts on the existing suite ecology.

The ecological assessment provides an appropriate assessment of the site with regard to most species, although more work is required in relation to bats. The assessment has identified that the site, although a former developed site, has been colonised by a range of habitat types that renders the site of biodiversity value. In particular, the site is likely support a small slow worm population as well as being beneficial for amphibians, invertebrates and mammals. The unused nature of the site has a high quality habitat that connects with the land to the east which is designated as a site of importance for nature conservation (SINC) (Borough Grade 1). In turn this SINC connects further northwards to the highly valuable Ickenham Marshes. The A40 provides a significant barrier for various species including reptiles and amphibians but far less so for winged animals. Consequently, this network is a rich and highly valued ecological corridor in an otherwise urbanised area.

The site also has a series of scattered trees which for the most part appear to have been assessed although it is not clear whether the tree belt to the north has been surveyed which is a concern as a large number of mature trees in this area will be lost to the development. The proposed development will effectively remove the majority of the important wildlife habitat on the site, reduce the opportunities for slow worm (protected species), remove a large amount of trees and ideal invertebrate habitat; ultimately the proposal would result in a net biodiversity and is therefore contrary to policy as presented.

However, the site is allocated for development and previous proposals have secured solutions to the net ecological reduction through works and contributions to the neighbouring land to the east. The only way this development could be policy compliant is for 1) a suitable clearance of the site that manages the ecological value prior to any clearance and 2) a contribution to an offsite solution that allows for translocation of species and mitigation for the onsite impacts.

Consequently, for the development to be policy compliant the developer must include a suitable contribution to the offsite plans for landscaping and public park works that cover

the ecological mitigation. The works are costed at £539,000 and the applicant has agreed to provide this as a financial contribution to mitigate the ecological harm.

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

BIODIVERSITY

A summary of Biodiversity Net Gain and Urban Greening Factor calculations have been prepared by the London Wildlife Trust and submitted in support of this planning application.

Biodiversity Net Gain summary:

The Proposed Development will achieve a positive net gain in biodiversity producing a score of 1.4, from a baseline score of 3.8 habitat units and a proposed development scheme of 5.2 habitat units. This a 26% biodiversity net gain, which is above HM Government's draft recommendation of achieving 10% net gain. The Biodiversity Net-Gain score is based on the creation of 8 distinct habitat types comprising:

- o Sealed surfaces (hardstanding)
- o Broadleaved woodland
- o Mixed native scrub
- o Modified grassland (amenity lawn)
- o Street trees (in hard-surfacing)
- o Open mosaic habitat
- o Introduced shrubs (including herbaceous planting)
- o Flower rich/species-rich neutral grassland

Urban Greening Factor:

The Proposed Development has achieved an urban greening factor of 0.4. The Urban Greening Factor score is based on the creation of 12 distinct surface cover types comprising:

- o Buildings (excluding green roofs/podiums)
- o Sealed surfaces
- o Permeable paving
- o Semi-natural vegetation
- o Hedgerow
- o Ground cover
- o Flower rich grassland
- o Standard trees in connected pits
- o Standard trees in individual pits
- o Rain gardens and SUD's
- o Extensive green roof
- o Intensive green roof

Were the development acceptable in all other respects, the delivery of the 0.4 urban greening factor would have been secured by way of a planning condition.

7.15 Sustainable waste management

Policy 5.16 of the London Plan (2016) sets out the Mayor's policy for waste management,

including the need to minimise waste and encourage recycling. This is supported by policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012).

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The Council's Waste Officer has been consulted on the application. In response to initial concerns raised by the Council's Waste Officer, the Applicant has submitted further information with regards to the Commercial bin storage area. All issues are now considered resolved and the provision of adequate refuse and recycling facilities should be secured by way of planning condition.

As such, the proposed development is considered to accord with Policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 5.16 of the London Plan (2016).

7.16 Renewable energy / Sustainability

Policies DMEI 1 and DMEI 3 of the Local Plan: Part 2 - Development Management Policies (2020) relate to reducing carbon emissions (and decentralising energy). Policy EM1 of the Local Plan: Part 1 - Strategic Policies (2012) relates to climate change.

Policy 5.2. Part A of the London Plan (2016) and draft policy SI 2 of the draft London Plan (Intend to Publish) (2019) requires development proposals to make the fullest contribution to minimising carbon dioxide emissions by employing the hierarchy of using less energy; supplying energy efficiently; and using renewable technologies. Part B of the policy currently requires non domestic buildings to achieve a 35% improvement on building regulations 2013. This policy also requires major residential developments to achieve a zero carbon standard. However if this cannot be achieved then a cash in lieu contribution will be sought. Parts C & D of the policy require proposals to include a detailed energy assessment.

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

The Council's Sustainability Officer has assessed the submitted information and has raised no objections to the proposed development subject to one condition and an offsite contribution. The condition is necessary to secure further details regarding the energy strategy, and the offsite contribution is necessary to make the development policy compliant (i.e. zero carbon).

The financial contribution is required because the energy assessment identifies a significant shortfall from the zero carbon target required by the London Plan. The shortfall amounts to 325.75 tCO₂. Consequently, the S106 must include a carbon offset contribution of £586,422, payable to the London Borough of Hillingdon in accordance with policy 5.2(e) of the London Plan.

Subject to the signing of a S106 and the suggested condition outlined above, it is

considered that the scheme could have satisfactorily addressed the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, in compliance with Policies DMEI 1 and DMEI 3 of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM1 of the Local Plan: Part 1 - Strategic Policies (2012) and Policy 5.2 of the London Plan, and the NPPF.

7.17 Flooding or Drainage Issues

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. Policies DMEI 9, DMEI 10 and DMEI 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding.

The application is not located within a zone at risk of flooding, however due to the size of the development it is necessary for it to demonstrate that it would incorporate sustainable drainage techniques and reduce the risk of flooding in accordance with the requirements of Local Plan Policies and Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

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

The Council's Flood Risk team have been consulted on the application and raised a number of queries which the Applicant then responded to. While there are aspects of the submitted drainage strategy that the Flood Risk team are not in agreement with, it is considered that the detail of the drainage design could be secured post-planning by way of a suitably worded condition. In this respect the Flood Risk team provided draft text for the suggested conditions which can be found above in the Internal Consultees section.

Furthermore, the drainage hierarchy (London Plan Policy 5.13) requires a connection to a watercourse in preference to a connection to the sewer. A S106 Contribution of £35,000 is therefore required for the Council to extend the watercourse from the site to Freezeland Covert as part of improvements to the Green Belt land to the east of the development.

This contribution should be treated separately from the Landscape/Ecology works to Freezeland Covert identified elsewhere in this report.

It is therefore considered that subject to suitably worded condition and a financial contribution (of £35,000) towards the cost of extending the watercourse from the site to Freezeland Covert, the scheme could be deemed in accordance with Policy EM6 (Flood Risk Management) of the Local Plan: Part 1 - Strategic Policies (2012), Policies DMEI 9, DMEI 10 and DMEI 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

7.18 Noise or Air Quality Issues

NOISE

The Government's National Planning Policy Framework (NPPF) gives the Government's guidance on noise issues. It states that planning decisions should (i) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, and (ii) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from new development, including through the use of conditions. According to the Government's Noise Policy Statement for England (NPSE) of March 2010, these aims should be achieved within the context of Government policy on sustainable

development.

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

Hillingdon LPP1 Policy EM8 seeks to promote the maximum possible reductions in noise levels and minimise the number of people potentially affected in target areas as identified by the Defra Noise Action Plan.

An Acoustic Assessment has been submitted in support of the proposed development. This report has been assessed by external consultants (Anderson Acoustics) on behalf of the Council and the Applicant was given the opportunity to respond. The Applicant's response was subject to further review by external consultants (Anderson Acoustics).

The primary noise sources were identified as the A40 to the north and Long lane to the west which was agreed by Anderson Acoustics (on behalf of the Council). However, aircraft movements to and from RAF Northolt were not logged in the Noise Assessment and so it is unknown if there were aircraft movements during the survey period. In summary, the external consultant (Anderson Acoustics) made the final following recommendations:

- That justification be sought for the MVHR in the context of the London Plan's cooling hierarchy and sustainable development;
- That further information be sought regarding the over-heating analysis mentioned is submitted to assist in the determination of the planning application;
- That in the event of planning permission being granted, to apply conditions for the CEMP; commercial and plant noise assessment and limits; and details of the final noise mitigation (including external amenity areas), ventilation and cooling strategy.

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

The proposed development is therefore recommended for refusal.

AIR QUALITY

With regards to air quality Policy DMEI 14 (Air quality) of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM8 of the Local Plan Part 1 (2012), Policy 7.14 (Improving Air Quality) of the London Plan (2016), Policy SI 1 of the draft London Plan - Intend to Publish (December 2019) and the NPPF are considered relevant.

The Applicant has submitted an Air Quality Impact Assessment as part of the application submission and this has been reviewed by Air Quality Experts Global Ltd on behalf of the Council. Air Quality Experts Global Ltd initially raised a number of queries which the Applicant has responded to in full. However many of the initial concerns remain. Air Quality Experts Global Ltd's full response is set out above in the Internal Consultee section but in summary the Applicant has failed to address the following issues:

- The applicant has not provided any quantification of the emission reduction that the proposed measures would achieve or set out what benefits would they yield in terms of air

quality

- The monitoring locations chosen are not located at hot spot locations which are likely to be affected by the proposed development
- The monitoring duration is not considered sufficient
- No neutral assessment has been submitted by the applicant as per the London Plan requirements.
- The applicant has failed to address the issue of worsening of existing exceedances
- The mitigation offered is not quantified in terms of emission reduction achieved
- No evidence has been produced to substantiate claims that the proposed development will not exacerbate congestion in the area or significantly impact local air quality

The appointed consultants have calculated a damage cost of £294,522 based upon the limited information provided to them to date, however, this has been calculated without all of the above information. It is not therefore possible to ascertain if a financial contribution of £294,522 would achieve an Air Quality Neutral development, or indeed if the sum is too high. As such, whilst the applicant has agreed to provide the sum, without the further information requested, the Council cannot agree to accept the sum, as it is not quantified if this would mitigate against the harm and provide policy compliance.

In summary, it is considered that the proposed development has failed to provide sufficient information regarding Air Quality within the development itself or demonstrate sufficient means of mitigation against the impact of the development on the wider area. This is contrary to Policy DMEI 14 (Air quality) of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM8 of the Local Plan Part 1 (2012), Policy 7.14 (Improving Air Quality) of the London Plan (2016), Policy SI 1 of the draft London Plan - Intend to Publish (December 2019) and the NPPF (February 2019). The proposed development is therefore recommended for refusal on this basis.

7.19 Comments on Public Consultations

The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015 as a Major Development. 1943 surrounding property owners/occupiers have been consulted. At the time of writing the report, two letters of support had been received and 265 representations had been received objecting to the scheme.

The main issues raised are summarised in the 'External Consultee' section of this report.

A number of objections have been raised by local residents in regard to impact on local infrastructure and services and in particular schools and GPs. The scale of the development and expected population is not expected to create a successful and sustainable neighbourhoods because it would represent a disproportionate influx of people which is inconstant with the existing context. The long-term needs of all residents including the existing residents would therefore be compromised.

Many of the concerns raised have been assessed and addressed by officers in this report in the relevant section. Officers have tried to ensure that the report sections cover objections where they relate to material planning considerations.

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

7.20 Planning obligations

The following contributions or planning obligations are required in order to mitigate the

impacts of the development as required by Policy DMCI 7 (Planning obligations and CIL) of the Local Plan Part 2 Development Management Policies (2020). If the application were to be considered for approval, the following broad S106 Heads of Terms would be pursued by the Council at that time:

(i). Affordable Housing:

Intermediate (shared ownership) = 61 units (33.5% of affordable units)
Affordable Rent (London Affordable Rent) = 121 units (66.5% of affordable units)
Total affordable = 182 units (35.4% of all units)

Intermediate (shared ownership) = 149 habitable rooms (10% of all habitable rooms)
Affordable Rent (London Affordable Rent) = 343 habitable rooms (25% of all habitable rooms)
Total affordable = 492 habitable rooms (35% of all habitable rooms)

Affordable (Intermediate (shared ownership) (Total of 61 units split into 34 x 1 bed, 27 x 2 bed)

Affordable (London Affordable Rent) (Total of 121 units split into 53 x 1 bed, 35 x 2 bed, 33 x 3 bed)

(ii). Construction Training: either a construction training scheme delivered during the construction phase of the development or a financial contribution secured equal to the formula as contained in the SPD (£2,500 for every £1m build cost + (total gross floor area/7,200m² x £71,675) = total contribution)

(iii). Landscape Screening and Ecological Mitigation: a financial contribution in the sum of £539,000

(iv) Carbon Fund: a contribution of £586,422 for a carbon fund to make up for the shortfall for this development and in order to make it policy compliant

(v). Parking Permit exclusion clause for all future residents

(vi) Car Club Spaces and 3 years free membership

(vii) Contribution of £35,000 towards the Council extending the watercourse from the site to Freezeland Covert in order to overcome surface water drainage issues

(viii) Project Management and Monitoring Fee: a contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement.

Contributions towards education, health, libraries and community facilities are now covered by the Hillingdon Community Infrastructure Levy.

Although the application is recommended for refusal, the Applicant has agreed in principle to the above proposed Heads of Terms, which could be secured by way of the S106

It is considered that the level of planning benefits sought in the event of an approval would be reasonable, adequate and commensurate with the scale and nature of the proposed development, in compliance with Policy DMEI 7 (Planning obligations and CIL) of the Local Plan: Part 2 - Development Management Policies (2020).

7.21 Expediency of enforcement action

Not applicable.

7.22 Other Issues

COMPREHENSIVE DEVELOPMENT

The application site forms part of the wider parcel known as Site 'B' of adopted site allocation SA14; Local Plan Part 2 (2020). The application site however does not encompass all land within Site B and therefore it is necessary to consider whether the proposals potentially blight the neighbouring land. The application submission has demonstrated that there are adequate set backs provided (a minimum of 13m from the main facade at Building 12) along the southernmost boundary of the application site, where it adjoins the remaining land parcel within site B to ensure that this site could come forward in isolation without being prejudiced by the current proposals.

FIRE SAFETY

Policy D12 (Fire safety) of the draft London Plan - Intend to Publish (2019) says that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. In this regard an Outline Fire Strategy has been submitted as part of the application. It is considered that a condition should be added to any permission to secure the submission, agreement and implementation of a detailed Fire Strategy for all parts of the development in accordance with draft Policy D12 (Fire safety) of the London Plan - Intend to Publish (2019).

8. Observations of the Borough Solicitor

General

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

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

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

Planning Conditions

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

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act

1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable.

10. CONCLUSION

No objections are raised to the principle of a mixed use development on the site. However, it is considered that the height, scale massing, siting and design of the development would fail to introduce a built form that is appropriate to the local context and character of the area and would have a negative impact on views from the neighbouring Green Belt and would be detrimental to the setting of nearby heritage assets. Furthermore, the density of the proposed development would be above London Plan guidance.

It is considered that the proposed development would, due to its size, scale, siting and mass, completely overwhelm its smaller scale suburban surroundings. The disproportionate scale of proposed tall development up to 11 storeys is clearly unsuitable for the proposed location, which is not proportionate to the scale of the local centre, but more in keeping with the scale of a metropolitan or regional centre.

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

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

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

Whilst the proposed development would generally provide acceptable living conditions in terms of space standards for all of the proposed units and protect the residential amenity of surrounding occupiers, objections still remain regarding daylight and sunlight levels for the proposed occupants, noise levels within the development and failure to provide sufficient information to assess if the development is air quality neutral. Furthermore, insufficient private amenity space has been provided.

Based on the information submitted to date, there are a number of issues which are also considered unsatisfactory. However it is considered that subject to appropriately worded conditions (or legal agreement) these issues could be resolved. These issues are; Accessibility within the site; Flood Risk and Surface Water Drainage; Landscaping and Ecology.

There are a number of items which need to be secured by way of a legal agreement which are listed in detail within the Planning Obligations section of this report. Although agreement to some of the obligations has been indicated by the Applicant neither a S106 Agreement or Unilateral Undertaking has been signed. The development therefore fails to satisfactorily address some issues relating to contributions towards the improvements required as a consequence of the proposed development. This is in respect of off-site highways works, public transport, travel plans, employment and training, parking permits and car club, landscape screening and ecological mitigation, affordable housing, surface water drainage, air quality, off-site carbon contribution and project management and monitoring.

For the reasons set out above, the application is being recommended for refusal.

11. Reference Documents

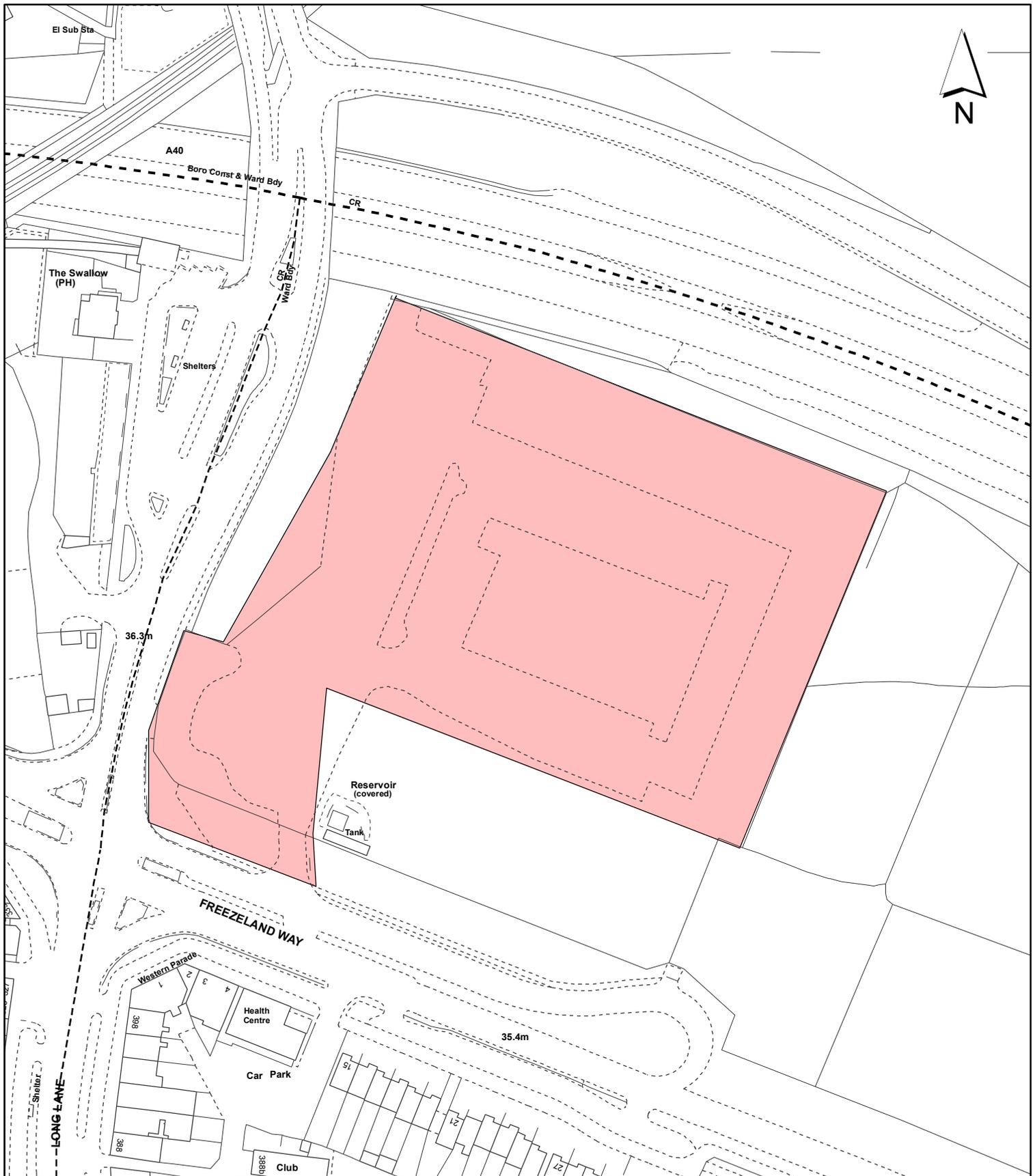
Hillingdon Local Plan: Part 1 Strategic Policies (2012)
Hillingdon Local Plan: Part 2 Site Allocations and Designations (2020)
Hillingdon Local Plan: Part 2 Development Management Policies (2020)
London Plan (2016)
Draft London Plan - Intend to publish (2019)
National Planning Policy Framework (2019)

The Mayor's Housing SPG (2016)
The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)

Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas

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Notes:

 Site boundary

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Site Address:

**Former Master Brewer Site
 Freezeland Way**

Planning Application Ref:
4266/APP/2019/3088

Planning Committee:
Major

Scale:
1:1,650

Date:
February 2020

**LONDON BOROUGH
 OF HILLINGDON**
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