

Report of the Head of Planning, Transportation and Regeneration

Address TELECOMMUNICATIONS AT JUN BRIDLE ROAD & CHENEY STREET
BRIDLE ROAD EASTCOTE

Development: Installation of 20m monopole and 3 equipment cabinets, and associated ancillary works (Application under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for determination as to whether prior approval is required for siting and appearance).

LBH Ref Nos: 75666/APP/2020/2552

Drawing Nos: HGN12189_PLANNING_REV_A Issue ,
Covering Letter dated 14 August 2020
Photographic Example of Phase 8 Streetpole
Aerodrome Notification dated 07 July 2020
Developers Notice dated 14.08.20
ICNIRP Compliance Certificate
002 HGN12189_PLANNING_REV_A Issue ,
100 HGN12189_PLANNING_REV_A Issue ,
150 HGN12189_PLANNING_REV_A Issue ,
215 HGN12189_PLANNING_REV_A Issue ,
265 HGN12189_PLANNING_REV_A Issue ,
304 HGN12189_PLANNING_REV_A Issue ,
306 HGN12189_PLANNING_REV_A Issue ,
Supplementary Information

Date Plans Received: 14/08/2020 **Date(s) of Amendment(s):**

Date Application Valid: 14/08/2020

1. SUMMARY

This application seeks prior approval under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 for the installation of 20m monopole with associated ground based equipment. The proposed development would not harmonise with the streetscene and open aesthetic and would have a detrimental impact on the visual amenities of the Eastcote Village Conservation Area and character of the area.

The proposal is considered to be an obtrusive form of development which would add visual clutter to the street scene. As such, it fails to comply with Policies DMHB 1, DMHB 11, DMHB 12 and DMHB 21 of The Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2019).

This application is recommended for Refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 **Non Standard reason for refusal**

The proposed development, by reason of the siting in this open prominent position, size,

scale and design of the proposed monopole and the size, scale and siting of the equipment cabinets, would create an obtrusive form of development which would add visual clutter to the detriment of the character, appearance and visual amenities of the street scene. The proposal is therefore contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies DMHB 1, DMHB 11, DMHB 12 and DMHB 21 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and the National Planning Policy Framework (February 2019).

2 NON2 Non Standard reason for refusal

In the absence of an appropriate appraisal of the surrounding area, the submission fails to adequately assess whether there are other more appropriate sites available for the development, in accordance with Paragraph 115 of the NPPF (February 2019) and Policy DMHB 21 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

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 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMHB 1	Heritage Assets
DMHB 4	Conservation Areas
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 21	Telecommunications
LPP 4.11	(2016) Encouraging a connected economy
NPPF- 10	NPPF-10 2018 - Supporting high quality communications

3 I71 LBH worked applicant in a positive & proactive (Refusing)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service.

We have however been unable to seek solutions to problems arising from the application as the principal of the proposal is clearly contrary to our statutory policies and negotiation could not overcome the reasons for refusal.

4

The applicant is advised that the consultation contact for RAF Northolt is DIO-Safeguarding-Statutory@mod.gov.uk.

5

The applicant is advised the information in the Supplementary Information document does not reflect the information on the proposed plans provided in regards to a rendered wall.

3. CONSIDERATIONS

3.1 Site and Locality

The application site is situated on the eastern side of Cheyney Street at the junction with Bridle Road. The application site comprises a footway and the site lies immediately south of No. 33 Bridle Road. The application site lies immediately next to Eastcote Conservation Area to the north. The surrounding area is residential in character.

3.2 Proposed Scheme

This application seeks prior approval under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 for the installation of a 20m monopole with wraparound Cabinet at the base with associated ground based equipment comprising 1 x H3G Batsman cabinet, 1 x H3G HUAWEI APM5930 equipment cabinet and 1 x Bowler Cabinet. (Volume of equipment housing = 2.9 cubic metres)

3.3 Relevant Planning History

75666/APP/2020/1854 Telecommunications At Jun Bridle Road & Cheney Street Bridle Road

Proposed erection of a 20 metre high Phase 8 telecommunications pole with built-in cabinet, 3 x separate equipment cabinets and ancillary works (Application under Part 16 of schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 for determination as whether prior approval is required for siting and appearance).

Decision: 21-07-2020 Withdrawn

Comment on Relevant Planning History

The most relevant application history is sited above.

4. Planning Policies and Standards

Policy DMHB 21 of The Local Plan: Part 2 - Development Management Policies (2020) states that telecommunication development will only be permitted where:

- i) it is sited and designed to minimise their visual impact;
- ii) it does not have a detrimental effect on the visual amenity, character or appearance of the building or the local area;
- iii) it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings;
- iv) there is no adverse impact on areas of ecological interest, areas of landscape importance, archaeological sites, Conservation Areas or buildings of architectural or historic interest; and

v) it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation.

Chapter 10 of the National Planning Policy Framework (2019) stresses the importance of advanced, high quality and reliable communications infrastructure and the role it plays in supporting sustainable economic growth. It goes on to advise that the aim should be to keep the numbers of radio and telecommunications masts and sites to a minimum, consistent with the efficient operation of the network and that existing masts and sites should be used unless there is a demonstrable need for a new site.

The aim of this application is to provide 5G network and improve coverage and capacity for one operator, Hutchison 3G UK Limited (H3G) in the area. A cell search has indicated that a total of 6 site has been examined including the site selected.

It is noted that the other sites were discounted due to the following reasons:

- Eastfields - Narrow Pavement
- Bridle Road - Densely residential and a number of houses look directly onto the street.
- Roads to South of Target/Search Area - Dropped kerbs, roadside parking
- Cheney Street - Densely residential and a number of houses look directly onto the street.
- Existing Telecommunications Infrastructure - Not capable of hosting additional equipment or extending signal reach across the area of coverage gap

A signed Declaration of Conformity has been provided as part of this submission.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.HE1 (2012) Heritage

Part 2 Policies:

DMHB 1 Heritage Assets

DMHB 4 Conservation Areas

DMHB 11 Design of New Development

DMHB 12 Streets and Public Realm

DMHB 14 Trees and Landscaping

DMHB 21 Telecommunications

LPP 4.11 (2016) Encouraging a connected economy

NPPF- 10 NPPF-10 2018 - Supporting high quality communications

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- Not applicable

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The application was consulted on between 26-08-2020 and 16-09-2020. 103 neighbouring notification letters were sent. 4 objections were received which are summarised as follows:

- The site had been developed into a green corner, with a mature tree and hedge, and is much appreciated by residents;
- The equipment is either within or on the edge of the Eastcote Conservation Zone and will certainly have a negative impact on the visual appearance of the conservation area;
- The centre of all trees are incorrectly shown on the plan;
- The proposal would result in a visual impact and impaired use of the neighbouring garden, there are concerns regarding safety at this very short distance;
- The placement of the mast and equipment cabinets is tight up against the picket fence which forms the boundary of the neighbouring property is a significant concern as it will become a maintenance issue;
- Concerned about the foundations for the 20 meter mast and the potential encroachment onto neighbouring property and the impact that will have on the trees and shrubs on the neighbouring property;
- The Proposed Site Plan is incorrect in that the distance from the mast to the bus shelter is only 6 meters not as shown on the plan. The Large Chestnut Tree has its trunk on the boundary fence and the tree is directly over the bus shelter;
- The Eastcote Flood Action Group is aware of severe flooding at this intersection;
- The area should be enhanced as a flood garden;
- Any diminution of soak away space or vegetation will impact on the safety of residents;
- The letter for this proposal was very sloppy and ;
- The proposal is an eyesore;
- There is similar telecommunications equipment nearby;
- It will detract from the open and verdant character of the area. Bridle Road was originally a bridle path edged with trees;
- Residents do not want monopoles outside their properties; and
- Photographs of the site flooded have been sent in objection to the application.

Officer comment: The issues are addressed within the main body of the report. In response to the matter relating to flooding, the Flood Water Management Officer notes the area well known for flooding, though a pole will have little impact on the flooding risk but may be susceptible if there is any electronic equipment situated low down.

STATUTORY CONSULTEES

Ministry of Defence

No comments received at the time of writing this report, any correspondence will be reported to planning committee through an addendum.

Internal Consultees

Highways Officer

Application for the installation of a monopole and related equipment on public footway. The equipment will be at the back of the footway at the wider corner section of the junction and will not impact on the width of the footway or pedestrian desire lines. The minimal servicing and maintenance requirements can be undertaken close to the site as there is unrestricted parking. There are no highways objections to the application.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Schedule 2, Part 16 of The Town and Country Planning (General Permitted Development)

(England) Order 2015 (as amended) states:

Permitted development

A. Development by or on behalf of an electronic communications code operator for the purpose of the operator's electronic communications network in, on, over or under land controlled by that operator or in accordance with the electronic communications code, consisting of -

- (a) the installation, alteration or replacement of any electronic communications apparatus,
- (b) the use of land in an emergency for a period not exceeding 6 months to station and operate moveable electronic communications apparatus required for the replacement of unserviceable electronic communications apparatus, including the provision of moveable structures on the land for the purposes of that use, or
- (c) development ancillary to radio equipment housing.

Development not permitted: ground-based apparatus

A.1 - (1) Development consisting of the installation, alteration or replacement of electronic communications apparatus (other than on a building) is not permitted by Class A(a) if:

(a) in the case of the installation of electronic communications apparatus (other than a mast), the apparatus, excluding any antenna, would exceed a height of 15 metres above ground level;

(b) in the case of the alteration or replacement of electronic communications apparatus (other than a mast) that is already installed, the apparatus, excluding any antenna, would when altered or replaced exceed the height of the existing apparatus or a height of 15 metres above ground level, whichever is the greater;

(c) in the case of the installation of a mast, the mast, excluding any antenna, would exceed a height of:

- (i) 25 metres above ground level on unprotected land; or
- (ii) 20 metres above ground level on article 2(3) land or land which is on a highway; or

(d) in the case of the alteration or replacement of a mast, the mast, excluding any antenna, would when altered or replaced;

(i) exceed the greater of the height of the existing mast or a height of:

- (aa) 25 metres above ground level on unprotected land; or
- (bb) 20 metres above ground level on article 2(3) land or land which is on a highway; or
- (ii) together with any antenna support structures on the mast, exceed the width of the existing mast and any antenna support structures on it by more than one third, at any given height.

Officer Comments:

The proposed monopole is 20m and is not located within article 2(3) land or land which is on highway. As such, it is in accordance with Condition A.1 - (1)(c)(i) of Schedule 2, Part 16 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Development not permitted: radio equipment housing

(9) Development consisting of the installation, alteration or replacement of radio equipment housing is not permitted by Class A(a) if:

(a) the development is not ancillary to the use of any other electronic communications apparatus;

(b) the cumulative volume of such development would exceed 90 cubic metres or, if located on the roof of a building, the cumulative volume of such development would exceed 30 cubic metres; or

(c) on any article 2(3) land, or on any land which is, or is within, a site of special scientific interest, any single development would exceed 2.5 cubic metres, unless the development is carried out in an emergency.

Officer Comments:

The total accumulative radio equipment housing would be 2.9 cubic metres, therefore the proposal is in accordance with Condition A.1 - (9)(b) of Schedule 2, Part 16 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

7.02 Density of the proposed development

Not applicable to this application.

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

The application site does not lie within an archaeology priority zone, conservation area nor does it comprise of a listed building. However the application site is immediately adjacent to the Eastcote Village Conservation Area and will impact the setting of the Conservation Area and the setting of No. 9 Cheyney Street which is Grade II listed.

The Planning (Listed Building and Conservation Areas) Act 1990, requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. The character of this area is largely derived from its semi-rural setting and low-density housing of varied design, including large detached houses as well as bungalows.

Paragraph 112 of the NPPF (2019) advises that advanced, high quality communications infrastructure is essential for sustainable economic growth and social well-being. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

Policy DMHB 1 of the Local Plan: Part Two -Development Management Policies (2020) notes the Council will expect development proposals to avoid harm to the historic environment.

The NPPF does not suggest that this should necessarily be a priority to outweigh all others; it is still necessary to balance the undoubted benefits to be gained by businesses and homes against other material considerations, such as the visual amenity of the conservation area, potential for damage to tree routes, and the safe use of the Borough's pavements, that may legitimately come within consideration of 'siting'. Any implication for the security of adjacent land or buildings also legitimately comes within 'siting', and is also a relevant consideration for the operators in applying the Communications Act.

The positioning of the telecommunication equipment in the proposed location would erode this rhythm and diminish the openness which plays a part of the attractiveness of this streetscape. The proposed telecommunication pole are of an unwieldy and visually prominent appearance, with the size of the monopole disproportionately large in the context

of the streetscene. The proposals, due to their siting and height would be visually prominent and have an unacceptable appearance and negative impact on the streetscape contrary to Policy HE1 of the Local Plan: Part One (2012) and Policy DMHB 1 of the Local Plan: Part Two - Development Management Policies (2020).

7.04 Airport safeguarding

Policy DMAV 1 of The Local Plan: Part 2 - Development Management Policies (2020) states that proposals that may be hazard to aircraft safety will not be permitted.

No objections to this application was received. Should the application be considered acceptable, an informative relating to cranes should be included within the decision notice.

7.05 Impact on the green belt

Not applicable to this application.

7.07 Impact on the character & appearance of the area

Policy DMHB 11 of the The Local Plan: Part 2 - Development Management Policies (2020) states that all development, will be required to be designed to the highest quality standards and, incorporate principles of good design including: harmonising with the local context by taking into account the surrounding scale of development, considering the height, mass and bulk of adjacent structures; local topography, views both from and to the site; impact on neighbouring open spaces and their environment; and ensuring the use of high quality building materials and finishes.

Policy DMHB 12 of the The Local Plan: Part 2 - Development Management Policies (2020) states that development should be well integrated with the surrounding area and accessible. It should: i) improve legibility and promote routes and wayfinding between the development and local amenities; ii) ensure public realm design takes account of the established townscape character and quality of the surrounding area; iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space; iv) provide safe and direct pedestrian and cycle movement through the space; v) incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard; vi) where appropriate, include the installation of public art; and vii) deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.

Policy DMHB 21 of The Local Plan: Part 2 - Development Management Policies (2020) states that Telecommunication development will only be permitted where: i) it is sited and designed to minimise their visual impact; ii) it does not have a detrimental effect on the visual amenity, character or appearance of the building or the local area; iii) it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings; iv) there is no adverse impact on areas of ecological interest, areas of landscape importance, archaeological sites, Conservation Areas or buildings of architectural or historic interest; and v) it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation.

The proposed new mast is 20 metres high with 3 cabinets located on a corner grass verge. The cabinets range in height from 1.2 to 1.75 metres and have an overall footprint of 2.9 cubic metres.

The site is set back from the highway, however it remains fairly exposed and is therefore highly visible when viewed from the immediate street scene and the surrounding area. The proposed 20m high telecommunications mast would appear as a prominent feature on

Holloway Lane and would have a detrimental impact on the openness, character and appearance of the street scene. In addition, due to the open nature and high visibility of the site, the proposed telecommunications installation would appear as an incongruous addition to the area.

There is currently no street furniture of this size and height. When compared to the adjacent light pole and the streetscene, the 20m high monopole will appear unduly dominant and intrusive. The overall height would be significantly over and above the surrounding area.

Whilst the mast is to provide 5G services, the proposal will add undue clutter to the streetscene which will have a significant negative impact on the visual amenity of adjacent residents and to the area in general. It would harm the character and appearance of the street scene and as such, the proposal is contrary to Policy BE1 of The Local Plan: Part 1 - Strategic Policies (2012) and Policies DMHB 11, DMHB 12 and DMHB 21 of The Local Plan: Part 2 - Development Management Policies (2020).

7.08 Impact on neighbours

Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020) seeks to ensure that developments do not adversely impact on the amenity of adjacent properties, and seeks to protect outlook.

The nearest residential dwellings is situated 9m to the north of the application site. The proposal would result in an overbearing impact on the amenity of the neighbouring property which it would sit directly outside.

7.09 Living conditions for future occupiers

Not applicable to this application.

7.10 Traffic impact, car/cycle parking, pedestrian safety

The Council's Highway's Officer has commented on this application and no objections has been raised. The site is located on the grass verge therefore will not impact on the footpath, pedestrian or highways safety.

7.11 Urban design, access and security

Refer to Section 7.07 of this report.

7.12 Disabled access

Not applicable to this application.

7.13 Provision of affordable & special needs housing

Not applicable to this application.

7.14 Trees, Landscaping and Ecology

Policy DMHB 14 of The Local Plan: Part 2 - Development Management Policies (2020) states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

The site is located on a tarmaced pavement. There are no trees that would be impacted by this proposal. However the proposal would have a notable visual impact on the verdant setting of the surrounding area.

7.15 Sustainable waste management

Not applicable to this application.

7.16 Renewable energy / Sustainability

Not applicable to this application.

7.17 Flooding or Drainage Issues

Not applicable to this application.

7.18 Noise or Air Quality Issues

Not applicable to this application.

7.19 Comments on Public Consultations

Refer to Section 6.1 of this report.

7.20 Planning Obligations

Not applicable to this application.

7.21 Expediency of enforcement action

Not applicable to this application.

7.22 Other Issues

HEALTH:

In terms of potential health concerns, the applicant has confirmed that the proposed installation complies with the ICNIRP (International Commission for Non Ionising Radiation Protection) guidelines. Accordingly, in terms of Government policy advice, there is not considered to be any direct health impact. Therefore, further detailed technical information about the proposed installation is not considered relevant to the Council's determination of this application.

8. Observations of the Borough Solicitor

General

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

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

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

Planning Conditions

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

Planning Obligations

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

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable to this application.

10. CONCLUSION

The application seeks prior approval for the installation of a ground-base apparatus consisting of 1 x 20m monopole and 3 cabinets and ancillary works under Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

The siting of the proposal would result in an unacceptable impact on visual amenity and the character and appearance of the area. Therefore, it is contrary to Policies BE1 and HE1 of The Local Plan: Part 1 - Strategic Policies (2012) and Policies DMHB 1, DMHB 11, DMHB 12 and DMHB 21 of The Local Plan: Part 2 - Development Management Policies (2020).

It is recommended that prior approval be required and that permission be refused.

11. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
The London Plan (2016)
National Planning Policy Framework (2019)
The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

Contact Officer: Zenab Haji-Ismail

Telephone No: 01895 250230



Notes:

 Site boundary

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Site Address:

Telecommunications at Jun Brindle Road & Cheney Street, Brindle Road, Eastcote

LONDON BOROUGH OF HILLINGDON
 Residents Services
 Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:

75666/APP/2020/2552

Scale:

1:1,250

Planning Committee:

North

Date:

September 2020



HILLINGDON
 LONDON