

Report of the Head of Planning, Transportation and Regeneration

Address THE WATERTOWER FIELD, DUCKS HILL FARM DUCKS HILL ROAD
NORTHWOOD

Development: Change of use of land to store wood and agricultural products for biomass energy including installation of 3 storage bays, siting of a portable office block and a portable toilet block and addition of a fence and gate

LBH Ref Nos: 60901/APP/2020/2979

Drawing Nos: Location Plan
East Elevation
West Elevation Revised
North Elevation
South Elevation
Block Plan
Planning Statement
Site Plan

Date Plans Received: 17/09/2020 **Date(s) of Amendment(s):**

Date Application Valid: 28/09/2020

1. SUMMARY

The application is for full planning for use of the site as a storage and distribution facility for biomass. The site will store raw material from Ducks Hill Farm, local gardeners, landscapers, and tree surgeons carrying out arboriculture work before sending it to biomass facilities. The application seeks the creation of three 180m² open storage bays totalling 540m², the siting of a portable site office totalling 8.92m², the siting of a portable two unit toilet block totalling 10.02m², the creation of two new accesses, removal of existing access, associated landscaping and hardstanding.

Policy DME 7 of the Local Plan Part 2 states: the Council will support farm diversification schemes including those related to the provision of renewable energy, provided that they minimise visual, traffic and environmental impacts and do not: (i) have an adverse impact on the open character of the countryside and landscape quality; (ii) contribute to visual "clutter"; (iii) significantly increase road traffic or congestion on rural roads and junctions; (iv) erode environmental quality, nature conservation value or limit public access to the countryside; and (v) have an adverse environmental impact on nearby residential areas or other sensitive receptors by virtue of noise, vibration, smoke, odour or emissions. The proposals are considered to conflict with a number of the objectives of policy DME 7.

The proposal represents inappropriate development within the Green Belt and it is considered that the proposal fails to demonstrate very special circumstances to overcome the harm by reason of inappropriateness and substantial harm to the openness and visual amenities of the green belt

Furthermore the application does not include an analysis of the impact on trees, including highway trees, over which the applicant has no control. The existing vegetation contributes to the character and appearance of the area, opposite Ruislip Woods. For these reasons, the application should be refused

Finally, based on the lack of submitted information related to the anticipated impacts of the proposal on the local highway network it is not possible for the Council to make a fully informed decision of the acceptability (or otherwise) of the proposal. A refusal on these grounds is therefore also recommended.

The application is before Committee as a result of a Member call in and the receipt of a petition against the proposal comprising 32 valid signatures.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The development represents inappropriate development within the Green Belt and no very special circumstances have been provided which either singularly or cumulatively overcome the presumption against inappropriate development in the Green Belt. The land proposed for the proposed change of use of the land including installation of 3 storage bays, siting of a portable office block and a portable toilet block and addition of a fence and gate would have an industrial appearance and cause substantial harm to the visual amenity and openness of the Green Belt. The proposal is therefore contrary to Policy EM2 of the Hillingdon Local Plan Part 1 (November 2012) and Policy DME1 4 of the Hillingdon Local Plan Part 2 (January 2020).

2 NON2 Non Standard reason for refusal

The proposal for a new exit, gate B, is likely to result in damage to, or removal of, existing highway trees along the roadside. The application does not include any analysis of the impact on trees, including highway trees, over which the applicant has no control. The existing vegetation contributes to the character and appearance of the area, opposite Ruislip Woods. The proposal is therefore contrary to Policies DME 7 and DMHB 14 of the Hillingdon Local Plan Part 2 (January 2020).

3 NON2 Non Standard reason for refusal

In the absence of comprehensive submitted information related to the impacts of the proposal on the highway network, the applicant has failed to demonstrate that the scheme would not result in material harm to the local and strategic highway network and by virtue of the large numbers of vehicle movements proposed would raise highway safety concerns. The proposal is therefore contrary to Policies DME7, DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (January 2020) and Policy 6.3 of the London Plan (2016).

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.

DME 2	Employment Uses Outside of Designated Sites
DME 7	Farm Diversification
DMHB 14	Trees and Landscaping
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
LPP 6.3	(2016) Assessing effects of development on transport capacity
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 4	NPPF-4 2018 - Decision-making

3 159 Councils Local Plan : Part 1 - Strategic Policies

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant Local Plan Part 2 (2020), then London Plan Policies (2016). Hillingdon's Full Council adopted the Hillingdon Local Plan: Part 1 - Strategic Policies on 8 November 2012 and the Hillingdon Local Plan Part 2 on 16 January 2020.

4 171 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.

3. CONSIDERATIONS

3.1 Site and Locality

The proposed site is accessed from Ducks Hill Road (A4180) in the Watertower field at Ducks Hill Farm. Ducks Hill Farm is a Class 3b DEFRA registered agricultural holding in Northwood comprising 154 acres, the majority of which is used to graze cattle and other livestock as well as the production of silage.

The site currently has an 84sqm, 4m high agricultural building located in the middle, an area of concrete hardstanding and permission for construction of a 5.3m high, 4,000sqft barn with associated hard standing under application 5907/APP/2020/779. There is no proposed change of use for the existing building on site and the proposed site layout of the development ensures that the building will continue to function as envisaged by maintaining good access. The North-West area of the site is already used for the storage of woodchip which is sold and used on Ducks Hill Farm.

3.2 Proposed Scheme

Change of use of land to store wood and agricultural product. The application seeks full planning for use of the site as a storage and distribution facility for biomass. The site will store raw material from Ducks Hill Farm, local gardeners, landscapers, and tree surgeons carrying out arboriculture work before sending it to biomass facilities. The application seeks the creation of three 180m² open storage bays totalling 540m², the siting of a portable site

office totalling 8.92m2, the siting of a portable two unit toilet block totalling 10.02m2, the creation of two new accesses, removal of existing access, associated landscaping and hardstanding.

3.3 Relevant Planning History

5907/APP/2018/1439 Ducks Hill Farm Ducks Hill Road Northwood
General Purpose Agricultural Building (Prior notification agricultural)

Decision: 02-07-2018 Approved

5907/APP/2018/4177 Ducks Hill Farm Ducks Hill Road Northwood
Change of use of land to B8 (Storage) and the siting of 36 shipping containers

Decision: 07-06-2019 Refused

5907/APP/2020/779 Ducks Hill Farm Ducks Hill Road Northwood
Erection of an agricultural building (Prior Approval)

Decision: 27-04-2020 PRN

60901/APP/2005/1902 The Water Tower Field, South Of Ducks Hill Grange Ducks Hill Road
INSTALLATION OF A 17.5 METRE HIGH MONOPOLE MOBILE PHONE MAST, GROUND
BASED EQUIPMENT CABINET, FENCED COMPOUND AND ANCILLARY DEVELOPMENT

Decision: 25-08-2005 Refused **Appeal:** 15-02-2006 Dismissed

60901/PRC/2020/165 The Water Tower Field, Ducks Hill Farm Ducks Hill Road Northwood
Change of use to a biomass storage site including installation of three storage bays, a portable
office cabin and portable toilet block.

Decision:

Comment on Relevant Planning History

5907/APP/2020/779 - Erection of an agricultural building (Prior Approval) (Prior Approval not required)

5907/APP/2018/1439 -General Purpose Agricultural Building (Prior notification agricultural)(Approval)

5907/APP/2018/4177 -Change of use of land to B8 (Storage) and the siting of 36 shipping containers (Refusal)

4. Planning Policies and Standards

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

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - 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)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

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

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

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.

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).

Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt. Paragraph 145 of the NPPF (2018) notes the construction of new buildings are inappropriate in the Green Belt. Exceptions to this include the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it and the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.

Policy 7.16 of the London Plan (2016) requires that the strongest protection is given to

Green Belt, inappropriate development should be refused (except in very special circumstances) and development that helps secure the objectives of improving the Green Belt will be supported. The supporting text to Policy 7.16 at paragraph 7.55 explains the role of Green Belt as multi functional green infrastructure, with the Mayor keen to see improvements in its overall quality and accessibility, particularly where they are likely to help human health, biodiversity and improve overall quality of life.

The following policies of the Local Plan: Part 2 - Development Management Policies (2020) are of particular relevance.

Policy DME1 4: Development in the Green Belt or on Metropolitan Open Land

A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

DMHB 11 Design of new development

A) All development, including extensions, alterations and new buildings 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.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing

detailed designs.

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.

Policy DME 7 of the Local Plan Part 2 states: the Council will support farm diversification schemes including those related to the provision of renewable energy, provided that they minimise visual, traffic and environmental impacts and do not: have an adverse impact on the open character of the countryside and landscape quality; contribute to visual "clutter"; significantly increase road traffic or congestion on rural roads and junctions; erode environmental quality, nature conservation value or limit public access to the countryside; and have an adverse environmental impact on nearby residential areas or other sensitive receptors by virtue of noise, vibration, smoke, odour or emissions.

UDP / LDF Designation and London Plan

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

Part 1 Policies:

Part 2 Policies:

DME 2	Employment Uses Outside of Designated Sites
DME 7	Farm Diversification
DMHB 14	Trees and Landscaping
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
LPP 6.3	(2016) Assessing effects of development on transport capacity
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 4	NPPF-4 2018 - Decision-making

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- Not applicable

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

Neighbours were notified on 30/09/2020. 6 objections were received and one supporting representation.

Objections were raised as follows:

- 1) The green belt between Northwood and Ruislip is essential in safeguarding the countryside from urban sprawl and merging as well as providing local amenity and character to the area.
- 2) It is not considered that very special circumstances' have been demonstrated
- 3) Inappropriate Development. While the new use of land would have some connection with agricultural purposes these numerous additional structures would amount to a clear encroachment

on the rural environment. Portaloos , offices and numerous structures clearly lessen the openness of the site and reduce its natural rural character.

4) In addition the proposals show elevations of open bays when they are empty but there is no limit on the height of the materials within the bays. The elevation of materials could drastically overfill the height of the walls.

5) This is a residential area bordering on green belt and although the lorries are entering and leaving the designated area with an in out system they are still going to be travelling through residential areas on either side.

6) Biomass fuel is of course beneficial yet this proposal not does meet the guidelines for being a sustainable green energy project given the small scale of the enterprise versus the substantial carbon footprint and pollution created

7) There is also the question of wildlife as the green belt is an important pathway for the existence of many important native species.

8) This storage use is very different to agricultural use.

In addition a petition with 32 signatures was received objecting on green belt and traffic grounds

Support

(1) One support representation was received stating that the applicants have been very good cooperative neighbours for many years and we know that this project will completed thoughtfully.

The Northwood Residents Association object for the following reasons:

The site will become a storage and distribution facility for the raw material biomass, so not the production itself. This storage use is very different to agricultural use.

The land in question is in the Green Belt, close to Ruislip Woods and opposite Copse Wood, and is seen when travelling by road from Ruislip to Northwood and we consider that the proposed use of the agricultural land will be visually intrusive.

The applicants report states, 'The location also has good transport benefits not available at other sites and will support the farm in line with policy.' In fact, it is on an A road where the entrance/exit is onto a part of the road with a 50 mph speed limit and a main link between residential areas. In addition, any decision should be based upon planning considerations and not business issues.

The applicants report states by the end of year three the traffic generation will be around 76 daily two-way vehicle trips with a maximum amount of two-way vehicle trips possible per day being 90. Is that 76 per day which is a huge number in itself, or in fact 152 movements on and off the road of 76 movements in and 76 out? It will be even more of a problem if the vehicles come through the residential area from Northwood as they will need to stop in a 50 mph part of the road and wait for a gap in oncoming traffic. They will also be slow to build up speed when leaving the site.

The majority of the traffic generated will be by way of large artic lorries described in the Planning Statement as capable of holding 25 tonnes of material which will be travelling, presumably from motorways outside the area, through shopping (Ruislip) and residential (Ducks Hill Road / Breakspear Road) streets and have an adverse impact on them. Although the applicants report suggests lower than full use initially, and then building up, for the purpose of the decision it needs to be assumed that full use will be made of the storage facility.

For these reasons The NRA is of the view that the proposed change of use of Green Belt farmland does not comply with Policy DME 7.

A Ward Councillor has requested the planning committee determine the application on the grounds that it will have a significant impact on:

Traffic movement

Road safety

Environmental standards - air quality

Green Belt incursion

Local amenity

Internal Consultees

Trees and Landscape Officer - This site is to the west of Ducks Hill Road, located to the south-east of Ducks Hill Grange and east of a water tower. The site currently has a 4 metre high agricultural building in the middle and an area of hardstanding. It is currently used to store / transfer wood waste delivered by local tree surgeons. There are trees within the site, however there are no TPO's or Conservation Area designations affecting the site. The land lies within the Metropolitan Green Belt, a designation which restricts development and seeks to retain openness of the countryside.

COMMENT The site has been the subject of a number of applications, most recently application ref. 2020/779, to build a 5.3m high 4,000sqft barn, which was granted consent in April 2020. No tree survey has been submitted, however, according to the D&AS there are no high value trees within the site. The section drawing shows a proposed entrance (gate A) at the southern end and a proposed exit (gate B) at the northern end. It is not clear whether the gate A corresponds with the existing entrance location which is in use at present? It is also confusing because the annotated plan within the D&AS has transposed gates A and B. The proposal for a new exit (B) is likely to result in damage to, or removal of, existing highway trees along the roadside. The site plan and the section drawing (East elevation) indicates a proposed hedge on the inside of the boundary fence which is unlikely to be seen from the road above the proposed 2.6metre high fencing.

RECOMMENDATION The information provided is inconsistent and unclear. There is no analysis of the impact on trees, including highway trees, over which the applicant has no control. The existing vegetation contributes to the character and appearance of the area, opposite Ruislip Woods. For the above reasons, the application should be refused.

Contaminated Land Officer - I note the proposed development would introduce a portable office and separate portable toilet, which would pose a risk to human health if quantities of any migrating landfill gas from the nearby landfilled materials were able to access and accumulate within enclosed spaces of the structures. I recommend the following gas condition including a condition for any imported soil materials be imposed if planning permission is granted: 1. Gas Condition Landfill Gas Survey Before any part of the development is commenced, the applicant shall conduct a landfill gas survey and submit details of any detected ground gases at the development site. Some of the landfill gas tests within the survey shall be taken below the proposed footprint of the proposed temporary new building/structures. If landfill gas is found, the applicant shall install remediation measures to prevent gas ingress to any buildings/structures on the development site, to the satisfaction of the Local Planning Authority. This condition will not be discharged until the works have been implemented and the appropriate validation and verification information has been submitted to the satisfaction of the Local Planning Authority. REASON: The Councils records show that parts of the development site are within 250 metres of a former landfill site which suggest possible ground gas risks. A gas survey is required to clarify that there is no significant gas migration from the landfill to the new development site, in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination. 2. Soil Materials Condition Imported Materials Condition No contaminated soils or other materials shall be imported to the site. All imported soils for engineering and/or landscaping purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to the Local Planning Authority for approval. REASON: To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

Highways Engineer - The site currently has a 4m high agricultural building located in the middle, an area of concrete hardstanding and permission for construction of a 5.3m high barn with associated hard standing under a 'Prior Approval' consent - 5907/APP/2020/779. There is no proposed change of use for the existing building on site and the proposed site layout of the development will allow the

building to continue to function as envisaged. Operations at the site are proposed between the hours of 6:30am and 6pm - Monday to Friday, 8am to 1pm on Saturdays and closed on Sundays. The site is remote from public transport connections hence dependency on private motor transport to and from the site vehicle by customers and staff is expected to be dominant which is amplified by the 'vehicle borne' nature of the proposal's planning use-type. An application (in proximity and to the north of this application site area) for a change of use of land to B8 (storage) use class and the siting of 36 shipping containers for self-storage use (5907/APP/2018/477) was refused in 2019 on 'Green Belt' issues but excluding highway related grounds.

Local Plan: Part 2 Policies - DMT 1 and DMT 2 require 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.

The applicant states that - "The development forecasts to have approximately 12 customers on average per day in the first year of operation, 24 in year two and around 32 in year three. It is anticipated that each customer will offload two tonnes of material each per trip. The material will be collected by artic lorries capable of holding 25 tonnes of material meaning it is expected that six lorries will visit the site per week in the first year, twelve in year two and 15 in year three. It is anticipated that two jobs will be created in the operation.

By the end of year three, the traffic generation will be around 76 daily two-way vehicle trips. As the site will operate under a policy T6 waste exemption which allows storage of up to 500 tonnes of material per week, the maximum amount of two-way vehicle trips possible per day would be 90. The traffic generated at the site is expected to be evenly spread out through the day, avoiding peak attendance at any one time which should remove any risk of congestion."

The stated level of projected activity which includes for 'depositing' and 'collection' vehicles for years 1 to 3 is anticipated to peak in year 3 with 32/15 two-way vehicles per day respectively. However, the applicant then mentions that at the end of year three-traffic generation would amount to 76 daily two-way vehicle movements which appears contradictory. Notwithstanding this point, it is considered that if the highest level of activity if evenly spread throughout day-time operational hours (as highlighted by the applicant) it is unlikely to have an adverse impact on the highway network capacity. However, it is particularly key to prevent any potential for concentrated movements to and from the site resulting in queuing/stacking of vehicles on Ducks Hill Road at any one time given the highly trafficked nature of the road combined with the 50 MPH speed limit. Avoidance of stacking would therefore assist in maintaining traffic free-flow and safety standards during the most critical morning and afternoon/early evening peak traffic base-line periods (i.e. 0730-0930 and 1630-1830) and outside of these hours. There is no detail presented with regard to the number of 'depositing' and 'collection' vehicles that can be accommodated within the compound.

The applicant should therefore demonstrate that the level of arrivals and departures throughout the day can be satisfactorily accommodated within the site curtilage without highway overspill. This should be remedied, with a demonstration and evidence of avoidance of potential vehicle stacking on the public highway at all times.

The applicant states that -

"The water tower field benefits from existing road access. However, the proposal seeks removal of the existing access and the creation of two new accesses.

Gate B will only be used as an entrance by lorries picking up material. Gate A will be used as an entrance for staff and customers and an exit for staff, customers, and loaded lorries. By doing this, the site can be separated into loading and tipping areas at the South and North of the site respectively, negating any risk of congestion to and from the site and allowing smooth operation on-site at all time. The new accesses shall be 6m wide allowing for artic lorries to drive straight into the site and avoid any risk of congestion on the main road. Both accesses would have good visibility of the road and not cause any issues turning into or out of the site."

The applicant states that -

"The water tower field benefits from existing road access. However, the proposal seeks removal of

the existing access and the creation of two new accesses.

The submitted plans seem to contradict the above proposed gate arrangement by transposing 'Gates A & B' as compared to the planning statement hence it is unclear as to where the exit and entrance would be positioned. This requires clarification. Notwithstanding this point, the suggested arrangement with Gate B operating solely as an entrance point with a two-way arrangement at Gate A would require an on-site management regime to ensure effective control of activities which would benefit both internal and external site workings

A full explanation of how customers and lorry drivers picking up material would be made aware of which entrance they should be using together with how the dual entry/exit would be managed. This aspect is considered vital as arriving vehicles are likely to experience confusion resulting in vehicles unnecessarily slowing or stopping on Ducks Hill Road which is unacceptable for obvious safety reasoning heightened by the imposed 50 MPH speed limit.

There should also be a demonstration of satisfactory access/egress sight-lines (in both directions on Ducks Hill Road) at both of the new access/egress points which should conform with the relevant mutual inter-visibility sight-line requirements, as per guidance contained within "Highways England's" - Design Manual for Roads and Bridges (The Design of Crossovers and Changeovers - Appendix 1 Geometric Design Table), between vehicles leaving and entering the site and vehicles/pedestrians on Ducks Hill Road.

Local Plan: Part 2 Policy - DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

The applicant states that -

"The proposal includes the provision of eight car parking spaces and one bicycle space for customers and staff. Maximum parking standards would require the provision of 15 spaces in line with local policy given the total area of the development. However, given the number of staff employed and a maximum number of 41 customers spread out through each day, the parking provision is deemed adequate."

There are no specific comments or issues raised with the level of parking provision as the level of site employment is relatively low hence the proposed level of car and cycle parking is considered acceptable

Conclusion

Based on the lack of submitted information related to the anticipated impacts of the proposal on the local highway network, it is not possible for this Authority to make a fully informed decision of the acceptability (or otherwise) of the proposal. A refusal on these grounds is therefore recommended.

"The application has been reviewed by the Highway Authority who express concern that in the absence of comprehensive submitted information related to the impacts of the proposal on the highway network, the application fails to demonstrate that the scheme would not result in material harm to the local and strategic highway network and would therefore raise highway safety concerns, contrary to Local Plan: Part 2 Development Plan (2020) Policies DMT 1 & DMT 2 and Policy 6.3 of the London Plan (2016)."

Planning Specialists Team Manager (Comment on air quality and other environmental considerations) - summary of comments:

There is no burning of biomass in the proposal, it is simply for storage and distribution. There is no need for the site to be where it is; there is no justification why biomass cannot be stored in a designated B8 location. The site is not in an air quality management area and the scale of

development would not justify an air quality refusal reason.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The National Planning Policy Framework (2019) states that the essential characteristics of Green Belts are their openness and their permanence. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. These can include limited infilling or partial redevelopment of previously developed sites. In consideration of applications substantial weight should be given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other circumstances.

Reference is given to a prior approval consent of an agricultural building not being implemented. It is considered that very little weighting can be given to this as a material planning consideration, as agricultural buildings are acceptable development in the green belt, whereas what is proposed is inappropriate development in the green belt.

The development represents inappropriate development within the Green Belt and no very special circumstances have been provided which either singularly or cumulatively overcome the presumption against inappropriate development in the Green Belt. The land proposed for the proposed change of use of the land including installation of 3 storage bays, siting of a portable office block and a portable toilet block and addition of a fence and gate would have an industrial appearance and cause substantial harm to the visual amenity and openness of the Green Belt.

The proposed change of use of the land would be contrary to the requirements of the NPPF, Policy EM2 of the Hillingdon Local Plan Part 1 (November 2012) and Policy DMEI 4 of the Hillingdon Local Plan Part 2 (January 2020).

7.02 Density of the proposed development

Not relevant

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

Not relevant

7.04 Airport safeguarding

Not relevant

7.05 Impact on the green belt

The site is located within the Green Belt. Para. 147 of the NPPF states that "When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."

The requirements of paragraph 145 g) of the NPPF only allow complete redevelopment of previously developed land which would not have a greater impact on the openness of the Green Belt. In consideration of applications substantial weight should be given to any harm to the Green Belt. This part of the site is currently undeveloped and the proposed change of use of the land to store wood and agricultural products for biomass energy including installation of 3 storage bays, siting of a portable office block and a portable toilet block and addition of a fence and gate would cause substantial harm to the openness of the Green Belt in contravention of the requirements of the NPPF, Policy EM2 of the Hillingdon Local

Plan Part 1 (November 2012) and Policy DME1 4 of the Hillingdon Local Plan Part 2 (January 2020).

7.07 Impact on the character & appearance of the area

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) requires all new development to maintain the quality of the built environment including providing high quality urban design.

The proposed installation of 3 storage bays, siting of a portable office block and a portable toilet block and addition of a fence and gate would be situated in the site immediately adjacent to Ducks Hill Road and would be clearly visible above any fencing surrounding the plot. The positioning of the bays is in a row of three concrete blocks. There is no clear indication of the height of storage proposed, Nevertheless, the scale of the development is such that it would be clearly visible within the street scene and the wider open countryside and would present as a commercial premises to the detriment of the visual amenity of the wider area.

7.08 Impact on neighbours

The proposals are not considered to have a significant impact on the amenity of the neighbouring properties, in accordance with the requirements of Policy DME 7. The nearest neighbouring properties are at Ducks Hill Grange and Ashby Cottages (Holland & Holland). Given the intervening distance no adverse impact is considered to arise.

7.09 Living conditions for future occupiers

Not relevant

7.10 Traffic impact, car/cycle parking, pedestrian safety

Based on the lack of submitted information related to the anticipated impacts of the proposal on the local highway network it is not possible for the Council to make a fully informed decision of the acceptability (or otherwise) of the proposal. A refusal on these grounds is therefore recommended by the Highway Authority.

The application has been reviewed by the Highway Authority who express concern that in the absence of comprehensive submitted information related to the impacts of the proposal on the highway network, the application fails to demonstrate that the scheme would not result in material harm to the local and strategic highway network and would therefore raise highway safety concerns, contrary to Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (January 2020) Policies DMT 1 & DMT 2 and Policy 6.3 of the London Plan (2016).

7.11 Urban design, access and security

Not relevant to this proposal.

7.12 Disabled access

Not relevant

7.13 Provision of affordable & special needs housing

Not relevant

7.14 Trees, Landscaping and Ecology

This site is to the west of Ducks Hill Road, located to the south-east of Ducks Hill Grange and east of a water tower. The site currently has a 4 metre high agricultural building in the middle and an area of hardstanding. It is currently used to store / transfer wood waste delivered by local tree surgeons. There are trees within the site, however there are no TPO's or Conservation Area designations affecting the site. The land lies within the Metropolitan Green Belt, a designation which restricts development and seeks to retain openness of the countryside.

The site has been the subject of a number of applications, most recently application ref. 2020/779, to build a 5.3m high 4,000sqft barn, which was granted consent in April 2020. No tree survey has been submitted, however, according to the D&AS there are no high value trees within the site. The section drawing shows a proposed entrance (gate A) at the southern end and a proposed exit (gate B) at the northern end. It is not clear whether the gate A corresponds with the existing entrance location which is in use at present? It is also confusing because the annotated plan within the D&AS has transposed gates A and B. The proposal for a new exit (B) is likely to result in damage to, or removal of, existing highway trees along the roadside. The site plan and the section drawing (East elevation) indicates a proposed hedge on the inside(?) of the boundary fence which is unlikely to be seen from the road above the proposed 2.6metre high fencing.

The information provided is inconsistent and unclear. There is no analysis of the impact on trees, including highway trees, over which the applicant has no control. The existing vegetation contributes to the character and appearance of the area, opposite Ruislip Woods. For the above reasons, the application should be refused.

7.15 Sustainable waste management

See below

7.16 Renewable energy / Sustainability

In the supporting statement the applicant explains that Biomass is classed as a renewable energy source as all organic material used to generate energy is regrown and the carbon recaptured. Approximately 39% of renewable energy use in the UK comes from biomass, of which approximately 23% is imported from abroad. There is high demand for suitable fuel that is not imported and reduces overall carbon footprint in transport. The site will aim to store and distribute 20,000 tonnes of biomass material per annum which otherwise might go to landfill, burnt or composted. The mix of material being brought to the site is expected to be 10% woodchip, 20% large logs and 70% mixed small logs and branches. One tonne of woodchip will produce approximately 3,500kWh (Biomass Energy Centre) which compares to average household power consumption in the UK of 3,860kWh (Department for Business, Energy and Industrial Strategy).

Officers comments - Whilst use of biomass can be viewed as a sustainable resource the applicant has not demonstrated very special circumstances why the use should take place on this site as opposed to an employment site outside the Green Belt.

7.17 Flooding or Drainage Issues

Not relevant to this application, the site is neither in a flood plain or critical drainage area.

7.18 Noise or Air Quality Issues

The distance from residential properties is such that there is not considered to be an issue concerning noise nuisance. Had the proposals been acceptable air quality issues concerns would have had to be addressed by condition. There is no burning of biomass in the proposal, it is simply for storage and distribution. The site is not in an air quality management area and the scale of development would not justify an air quality refusal reason.

7.19 Comments on Public Consultations

These are covered in the body of the report.

7.20 Planning Obligations

Not applicable

7.21 Expediency of enforcement action

Not relevant

7.22 Other Issues

None.

8. Observations of the Borough Solicitor

General

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

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

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

Planning Conditions

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

Planning Obligations

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

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable

10. CONCLUSION

The application is for full planning for use of the site as a storage and distribution facility for biomass. The site will store raw material from Ducks Hill Farm, local gardeners, landscapers, and tree surgeons carrying out arboriculture work before sending it to biomass facilities. The application seeks the creation of three 180m² open storage bays totalling 540m², the siting of a portable site office totalling 8.92m², the siting of a portable two unit toilet block totalling 10.02m², the creation of two new accesses, removal of existing access, associated landscaping and hardstanding.

The proposal represents inappropriate development within the Green Belt and it is considered that the proposal fails to demonstrate very special circumstances to overcome the harm by reason of inappropriateness and substantial harm to the openness and visual amenities of the Green Belt

Furthermore the application does not include an analysis of the impact on trees, including highway trees, over which the applicant has no control. The existing vegetation contributes to the character and appearance of the area, opposite Ruislip Woods. For the above reasons, the application should be refused

Finally, based on the lack of submitted information related to the anticipated impacts of the proposal on the local highway network it is not possible for the Council to make a fully informed decision of the acceptability (or otherwise) of the proposal. A refusal on these grounds is therefore also recommended.

11. Reference Documents

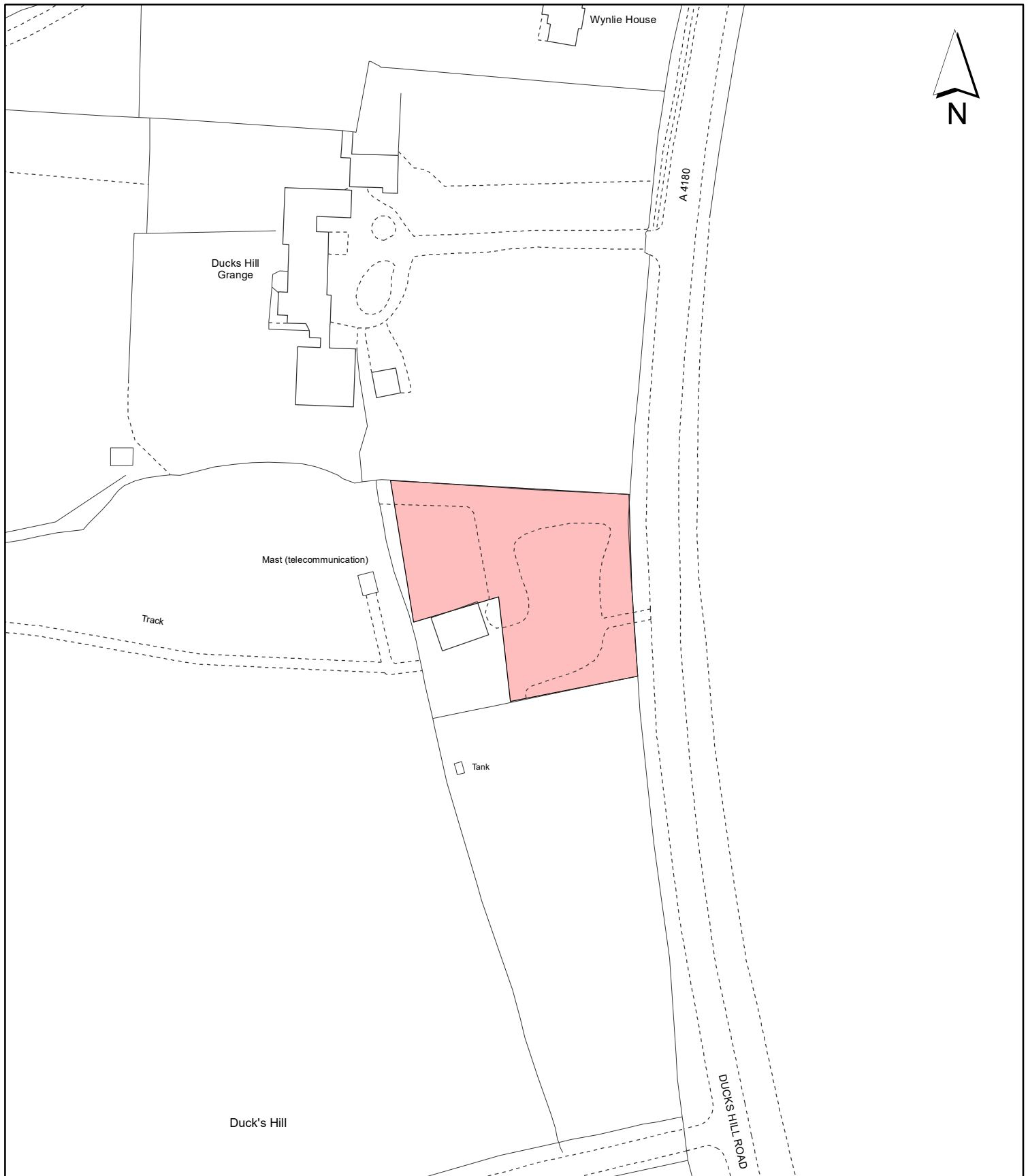
The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The London Plan - Consolidated With Alterations (2016)

Contact Officer: Cris Lancaster

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Notes:

 Site boundary

For identification purposes only.
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Site Address:
**The Watertower Field
 Ducks Hill Farm
 Ducks Hill Road**

**LONDON BOROUGH
 OF HILLINGDON**
 Residents Services
 Planning Section

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

Planning Application Ref:
60901/APP/2020/2979

Scale:
1:1,250

Planning Committee:
North

Date:
December 2020

