

Report of the Head of Planning, Transportation and Regeneration

Address BRUNEL UNIVERSITY KINGSTON LANE HILLINGDON

Development: Construction of a new research building and an infill building which includes the partial redevelopment of an existing building for research purposes together with associated substation, two bin stores, car parking, access and landscaping

LBH Ref Nos: 532/APP/2020/3198

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Air Quality Assessment
Arboricultural Assessment
Ecology Assessment
Energy Assessment
Flood Risk Assessment Appendices
Flood Risk Assessment
Ground Conditions Statement
Transport Assessment
Travel Plan

Date Plans Received: 06/10/2020

Date(s) of Amendment(s):

Date Application Valid: 15/10/2020

1. SUMMARY

This application seeks full planning permission for the construction of a new research building and an infill building which includes the partial redevelopment of an existing building for research purposes together with associated substation, two bin stores, car parking, access and landscaping. The buildings would be used as part of the University's existing Brunel Centre for Advanced Solidification Technology (BCAST) and would be used in conjunction with the existing BCAST 1 and BCAST 2 buildings where metallurgical research for high value manufacturing in the UK is undertaken. The site is currently used as a campus car park, comprising 118 parking spaces.

The application site lies within the Green Belt, the proposal therefore constitutes inappropriate development in the Green Belt. However, the applicant sets out 'very special circumstances' for the development, which include substantial employment, inward investment and sustainability benefits of the proposal. It is considered that the benefits, when weighed against the drawbacks of the proposed development are significant and therefore very special circumstances weighing in favour of the proposal exist in this case.

Notably, the Mayors Office (GLA) raises no objections to the scheme subject to a stage 2 referral. The proposal is therefore considered acceptable in principle.

Given that the proposal involves a building in an area of the campus that has been previously developed, the existing landscape character, and the proposed planting strategy, it is considered that the visual impacts of the proposal will not be detrimental to the character of the area, or the perception of openness of this part of the Green Belt.

The construction of the main new building would result in the displacement of 53 car parking spaces. However the application proposes to relocate all of these spaces in different areas across the campus which is considered acceptable. As such the development would not result in a loss of parking. Furthermore, as stated in the recommendation notes section of this report an obligation for the applicant to amend the current campus wide travel plan to incorporate this proposed development has been included and will be secured within the s106 legal agreement.

It is not considered that the proposal will have an unacceptable impact on the surrounding highway network or on the ecology of the area. Furthermore it will not result in a risk of flooding and it will not have any significant detrimental impacts on the amenity of occupants of the nearest residential properties.

The proposal is considered to comply with relevant Local Plan Part 1 - Strategic Policies (2012), Local Plan: Part 2- Development Management Policies (2020) and London Plan policies, in addition to objectives within the National Planning Policy Framework. Accordingly, approval is recommended, subject to conditions and a S106 Agreement, requiring 'in kind' construction training and control of the use of the building to research and development.

2. RECOMMENDATION

That delegated powers be given to the Head of Planning, Transportation and Regeneration to grant planning permission, subject to the following:

- 1. That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.**
- 2. That should the Secretary of State not call in the application, the application be deferred for determination by the Head of Planning, Transportation and Regeneration for an approval.**

That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) to secure the following:

- A). Secure the restriction of use of the building to:**
- (i) scientific research associated with or ancillary to industrial production or manufacture**
 - (ii) light industrial production or manufacture of a nature which is dependent upon or gives rise to regular consultation with either or both of the following:**
 - the research development and/or design staff of the occupier or any company with which the occupier is associated or any company forming part of a group of companies of which the occupier is part**
 - the scientific staff or facilities of Brunel University or of other scientific institutions or bod**

B). Travel Plan. The applicant shall amend the universities existing site wide travel plan to incorporate the additional trips associated to the proposed development and it's community use.

C) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances.

3) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

4) That Officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

5) Project management and monitoring fee: A financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

6) If the Legal Agreements have not been finalised by 8th March 2021 (or such other timeframe as may be agreed by the Head of Planning, Transportation and Regeneration), delegated authority be given to the Head of Planning, Transportation and Regeneration to refuse planning permission for the following reason:

'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 travel plan and air quality) therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); the adopted Planning Obligations Supplementary Planning Document (July 2014); Polices 8.2 of the London Plan (March 2016); Policy DF1 of the Publication London Plan - (December 2020) ; and paragraphs 54-57 of the National Planning Policy Framework (February 2019).'

6) That subject to the above, the application be deferred for determination by the Head of Planning, Transportation and Regeneration and the following conditions be attached:-

1 COM3 Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers

26676-PAW-SI-SL-DR-A-0120
26676-PAW-SI-SL-DR-A-0104
26676-PAW-SI-SL-DR-A-0121
26676-PAW-SI-SL-DR-A-0122
26676-PAW-01-00-DR-A-0105
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26676-PAW-01-XX-DR-A-0116
26676-PAW-01-ZZ-DR-A-0112
26676-PAW-01-ZZ-DR-A-0113
26676-PAW-01-ZZ-VS-A-0115
26676-PAW-02-00-DR-A-0105
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26676-PAW-02-XX-DR-A-0116
26676-PAW-02-ZZ-VS-A-0115
26676-PAW-ZZ-ZZ-DR-A-0114
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26676-PAW-02-ZZ-DR-A-0109
26676-PAW-02-ZZ-DR-A-0110
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26676-PAW-01-ZZ-DR-A-0119
26676-PAW-02-00-DR-A-0118
26676-PAW-02-ZZ-DR-A-0119
26676-PAW-SI-SL-DR-A-0117
26676-OOB-SI-SL-DR-L-2001_P07
26676-OOB-SI-SL-DR-L-2020_P02
26676-OOB-SI-SL-DR-L-2025_P02
26676-OOB-SI-SL-DR-L-2100_P05

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

3 NONSC Remediation Strategy

If, during development, contamination not previously identified is found to be present at the site then no further development, (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy, detailing how the contamination will be dealt with, has been submitted to and approved in writing by the LPA.

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 Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

4 COM5 General compliance with supporting documentation

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

Noise Assessment
Fire strategy report
26676-OOB-SI-SL-DR-L-2010_P04
Air Quality Assessment
Arboricultural Assessment
Ecology Assessment
Energy Assessment
Flood Risk Assessment Appendices
Flood Risk Assessment
Ground Conditions Statement
Transport Assessment
Travel Plan

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

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

5 NONSC Imported Materials

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.

6 NONSC Flooding

Prior to commencement, (excluding demolition and site clearance) the details of a scheme for the provision of sustainable water management shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it, manages water in the most sustainable ways and is compliance with the strategy set out in FRA report produced by BDP dated September 2020 which Sets out the site will: Achieve a run off rate from the site of 2.5l/s Provided through the following SuDs elements: Green Roof, rain gardens, permeable paving and tanks. The responsibility for the drainage system lies with the university. Further details need to be provided on certain elements within the drainage design. Any changes to the strategy should be justified and evaluated and the final proposals must be integrated with provision of green infrastructure,

air quality and urban greening requirements to justify the most sustainable final solution is provided. Additional information should be provided on: Green roofs which were specified and further detail of these detailed design stage and Rain gardens Methods to minimise the use of potable water through:

- i. incorporating water saving measures and equipment.
- ii. Collecting water for use and recycling
- iii. Safe access and egress must be demonstrated - any above ground storage and or overland flooding or flows paths should be mapped, (please include depths and velocities and hazards) above the 100, plus climate change.

REASON:

To ensure that the development compiles with the Hillingdon Local Plan: Part 1- Strategic Policies Policy EM6 Flood Risk Management in (Nov 2012), Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 1 Living Walls and Roofs and on site vegetation (Jan 2020) Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 9 Management of Flood Risk (Jan 2020) Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 10 Water Management, Efficiency and Quality (Jan 2020) London Plan Policy 5.12 Flood Risk Management (March 2016) London Plan Policy 5.13 Sustainable Drainage (March 2016), and London Plan Policy 5.15 Water use (March 2016). National Planning Policy Framework (June 2019), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

7 COM8 Tree Protection

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

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

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed. The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

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

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.

REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020)

8 COM9 Landscaping (car parking & refuse/cycle storage)

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, including pollution absorbing species,
 - 1.d Details and locations of bird boxes and bat boxes

2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage(for 20 cycle spaces)
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layouts for 116 car parking spaces 10 of which should be disabled accessible spaces within the Science Park Car Park (including demonstration that 6 are served by active and 6 passive electrical charging points)
 - 2.e Hard Surfacing Materials
 - 2.f External Lighting

3. Details of Landscape Maintenance
 - 3.a Landscape Maintenance Schedule for a minimum period of 5 years.
 - 3.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

4. Schedule for Implementation

5. Other
 - 5.a Existing and proposed functional services above and below ground
 - 5.b Proposed finishing levels or contours

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

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DME1 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (2016)

9 COM13 Restrictions - Enlargement of Industrial/Warehouse Buildings

Notwithstanding the provisions of Part 8, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that

Order with or without modification), the building(s) shall not be extended without the prior written consent of the Local Planning Authority.

REASON

To enable the Local Planning Authority to assess all the implications of the development and in accordance with policy DMHB 2, DMHB 11 of the Hillingdon Local Plan Part 2 (2020)

10 COM14 No additional internal floorspace

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

REASON

To enable the Local Planning Authority to assess all the implications of the development and to ensure that adequate parking and loading facilities can be provided on the site, in accordance with Policy DMT1, DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020)

11 RES7 Materials (Submission)

No development shall take place until details of all materials and external surfaces have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include information relating to make, product/type, colour and photographs/images.

REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

12 NONSC Living walls and screens

Prior to above ground works, a plan showing the incorporation of living walls/screens into the development shall be submitted to and approved in writing by the Local Planning Authority. The plan shall show how planting will be incorporated into at least the southern elevation and covering a sufficient area to be of value to screening the building and providing an ecological benefit (through the inclusion of nectar rich planting). The development must proceed in accordance with the approved plan.

Reason

To ensure the development contributes to sustainable design and enhances opportunities for wildlife in accordance with Policy EM7 of the Local Plan Part 1.

13 NONSC Noise

A detailed assessment shall be submitted and approved in writing by the Local Planning Authority to confirm the scheme to control machinery and plant noise emanating from the site. The site noise is to be determined in accordance with BS 4142, and standard calculation procedures such as those in ISO 9613 and BS EN ISO 12354, as required, and shall be no higher at the nearest residential accommodation (including dwellings and Halls of Residence) than the relevant "Plant Noise Rating Level Limit" presented in Table 7.1 of the MACH Acoustics Ltd Noise Impact Assessment report (dated 18/09/2020).

REASON

To ensure the development accords with the requirements of Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy 7.15 of the London Plan (March 2016).

14 NONSC Air Quality 1

No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up in accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

Reason: Compliance with London Plan Policy 7.14 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

15 NONSC Air Quality 2

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority.

The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

Reason: Compliance with London Plan Policy 7.14 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

16 NONSC Low emissions strategy

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall address

1) the fleet composition serving the proposed development to be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards.

2) the supply of energy to the proposed development. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements;

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.

3) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with a minimum of the number of charging points required in the London Plan.

4) a clear and effective strategy to encourage staff / users to

a) use public transport;

b) cycle / walk to work where practicable;

c) enter car share schemes;

d) purchase and drive to work zero emission vehicles.

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 DME1 14 of the emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, Mayor's Intent to Publish London Plan Policy SI1, and paragraph 170 of the National Planning Policy Framework (2019).

17 NONSC Crane operation plan

Prior to above ground works, if a Crane is required then a Crane Operation Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence (RAF Northolt) and Heathrow Airport Limited. The submitted plan shall include details of:

- cranes and other tall construction equipment (including the details of obstacle lighting) - Such schemes shall comply with Advice Note 4 'Cranes and Other Construction Issues'(available at www.aoa.org.uk/policy-campaigns/operations-safety).

The approved Crane Operation Plan (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

18 NONSC Construction management plan

Prior to commencement of development the applicant shall submit a Construction Management Plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

REASON

To safeguard the amenity of surrounding areas in accordance with Policy DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

19 RES24 Secured by Design

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

REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to ensure the development provides a safe and secure environment in accordance with policy DMHB 15 of the Local Plan Part 2 (2020) and London Plan (2016) Policies 7.1 and 7.3.

20 NONSC Bird hazard management

Prior to above ground works, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with Heathrow Airport Limited and the Ministry of Defence. The submitted plan shall include details of:

- management of any flat roofs within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the building.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

21 NONSC Fire safety strategy

Prior to the commencement of the development, a final and comprehensive Fire Safety Strategy shall be submitted to and approved in writing by the Local Planning Authority in consultation with Building Regulations. The principles of the submitted Fire Strategy Report shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that adequate facilities are provided for people with disabilities in accordance with Policy D12 of the emerging London Plan (Intend to Publish version 2019).

22 NONSC Waste management strategy

No development shall take place until details of a Refuse Management Strategy for the development hereby permitted has been submitted to and approved in writing by the Local Planning Authority. Thereafter the operation of the site shall be in full accordance with the approved Refuse Management Strategy.

REASON

To promote and ensure appropriate and sustainable management of waste arising from the development in accordance with Policy 5.17 of the London Plan (March 2015).

INFORMATIVES

1 Compulsory Informative (1)

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

2

Due to the age of the buildings, there is a possibility that asbestos will be present therefore, demolition and removal of any asbestos containing material (ACM) must be carried out in accordance with guidance from the Health and Safety Executive (see <https://www.hse.gov.uk/asbestos/index.htm>)

3 I53 Compulsory Informative (2)

The decision to GRANT 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.

DMCI 2	New Community Infrastructure
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
LPP 2.2	(2016) London and the wider metropolitan region
LPP 2.6	(2016) Outer London: vision and strategy
LPP 3.2	(2016) Improving health and addressing health inequalities
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.3	(2016) Sustainable design and construction
LPP 6.9	(2016) Cycling
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
	Planning for Safer Places

DMHB 15	
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 3.16	(2016) Protection and enhancement of social infrastructure
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 5.13	(2016) Sustainable drainage
LPP 5.18	(2016) Construction, excavation and demolition waste
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 7.21	(2016) Trees and woodlands
LPP 7.3	(2016) Designing out crime
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
LPP 8.4	(2016) Monitoring and review

4 170 **LBH worked applicant in a positive & proactive (Granting)**

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 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, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

5

The proposed development shall have regard for:

- a) The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.
- b) Fixtures, fittings and furnishings, particularly hard materials should be selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2009+A1:2010, Section 9.1.2, and, BS 223 in selecting an appropriate acoustic absorbency for each surface.
- c) Care should be taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, including appropriate door to ensure that doors and door furniture can be easily located by people with reduced vision.
- d) Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.
- e) Care must be taken to ensure that overspill and/or other interference from induction

loops in different/adjacent areas does not occur.

f) Flashing beacons/strobe lights linked to the fire alarm should be carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

3. CONSIDERATIONS

3.1 Site and Locality

The site which is 0.87 hectares in extent, is located to the south east side of the University campus. The site forms part of the Science Park and is bounded by the BCAST AMCC 1 & BCAST AMCC 2 as well as the Gardiner, Elliot Jaques and Russel buildings which are all part of the Science Park. The southern boundary with Nursery Lane is defined by a hedge-lined boundary fence which runs around the southern edge of the campus, with allotments to the south.

The site is currently used as a car park, comprising 118 surface level car parking spaces. Vehicular access is gained via a perimeter road to the north west side of the site. This road in turn gains access from the main University entrance, onto Kingston Lane.

There are a number of established trees on site, including individual specimens within the car park and southern boundary and larger groups of established specimens on the west side and in the south-west corner.

The entire University campus together with land to the south is located within the Green Belt. There are 5 defined parts of the larger campus with sites 1 and 2 of the University Campus have historically been identified as a 'Major Developed Site', in which certain forms of infilling and redevelopment are considered appropriate. The application site lies within the Major Developed Site known as Site 2.

3.2 Proposed Scheme

Planning permission is sought for the erection of a research building, together with associated stores, car parking, access and landscaping. The building would be used as part of the University's existing Brunel Centre for Advanced Solidification Technology (BCAST). The proposed 'BCAST' building would support the UK manufacturing sector by conducting research and development in the resource efficient processing of high performance alloys for the automotive industry.

The applicant has submitted that there are four pivotal drivers that embrace the purpose of the centre:-

- (1) Leading scientific research
- (2) Leading in the practical application of research.
- (3) Securing a sustainable future for the automobile industry
- (4) Securing UK employment in manufacturing for automobile and component industries

The facilities would be installed in a purpose-built laboratory, complete with power, water and gas supply.

The specific works include:-

- A new building, extension and partial re-building of an existing building, totalling 1,498.5 sqm floorspace (gross internal area).

- Demolition of parts of the existing Gardiner Building, totaling 484.1 sqm.
- The proposed buildings will replace an existing area of 118 parking spaces. The proposal will include the replacement of 65 spaces adjacent to the new building and 53 spaces in existing hard standing areas elsewhere on campus, to ensure that there is no loss of parking throughout the wider site.
- Provision of 10 cycle stands (20 spaces) in addition to the six existing ones nearby Elliott Jaques.
- Associated substation and two bin stores (one is relocated, the other new).
- Additional landscaping, including green walls, a new academic square, boulevard, wildlife garden and green streets

3.3 Relevant Planning History

532/APP/2014/30 Brunel University Kingston Lane Hillingdon

Construction of a research building, together with associated substation, stores, car parking access and landscaping.

Decision: 16-06-2014 Approved

532/APP/2015/3350 Brunel University Kingston Lane Hillingdon

Construction of a research building, together with associated substation, car parking, access and landscaping.

Decision: 13-01-2016 Approved

Comment on Relevant Planning History

Planning permission (532/APP/2015/3350 dated 11-03-16) was granted for the construction of a research building, together with associated substation, car parking, access and landscaping. This was subject to a s106 agreement preventing the changing of the use of the building for educational purposes in line with the intentions of original permission for the science park. This building is known as AMCC BCAST 2 and is the second of the two aluminum and metal casting buildings which received substantial grant funding following the success of BCAST 1.

Planning permission (532/APP/2014/30 dated 26-06-14) was granted for the construction of a research building, together with associated substation, car parking, access and landscaping. This was subject to a s106 agreement preventing the changing of the use of the building for educational purposes in line with the intentions of original permission for the science park. This building is known as AMCC BCAST 1 formed the centre of research and casting aluminum vital motor vehicle parts and received significant funding from central government and private sector sponsors.

Planning permission was granted for the construction of an Industrial Science Park on 12 October 1983. (ref: 532FX/81/1648). The development was subject to a S52 Agreement, limiting the use of the buildings to:

- (i) scientific research associated with or ancillary to industrial production or manufacture
- (ii) light industrial production or manufacture of a nature which is dependent upon or gives rise to regular consultation with either or both of the following:
 - the research development and/or design staff of the occupier or any company with which the occupier is associated or any company forming part of a group of companies of which the occupier is part

- the scientific staff or facilities of Brunel University or of other scientific institutions or bodies.
- (iii) ancillary buildings, processes and works appropriate to use for the Science Park.

The reason for this restriction was to ensure that the site was used as a Science Park and not for general industrial purposes.

Outline planning permission was granted on 19 April 2004 for the erection of 48,064 square metres of new academic floor space, 69,840 square metres of new student residential accommodation, ancillary floor space and infrastructure, provision of 645 additional parking spaces, improved access from Kingston Lane, new access from Cowley Road, highway improvements to Cleveland Road, improved pedestrian and cycle routes, landscaping and environmental improvements, involving demolition of 18,600 square metres of existing floor space.

This outline planning permission included the provision of 645 additional parking spaces in addition to the existing 1,953 marked parking spaces (excluding the Science Park) on sites 1 and 2.

4. Planning Policies and Standards

Development Plan

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)
- The West London Waste Plan (2015)
- The London Plan - Consolidated With Alterations (2016)

Material Considerations

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 (Publication Version, December 2020)

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 2019.

The Mayor considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required.

On 9th December 2020, the Mayor wrote to the Secretary of State to advise of his intention to formally approve a new draft London Plan, which included his best understanding of the modifications required. The Secretary of State responded on 10th December 2020 requesting that the draft London Plan was re-submitted with more specific amendments to address the 11 previous Directions and 2 additional Directions. On 21st December 2020, the Mayor formally approved a new London Plan, the 'Publication London Plan'. This has been submitted to the Secretary of State. The Secretary of State has 6 weeks to respond or can request a further extension of time. The Mayor can only publish the Plan after the Secretary of State has given approval.

More limited weight should be attached to parts of draft London Plan policies where the Secretary of State has directed specific amendments. Greater weight may be attached to policies that are not subject to the specific amendments from the Secretary of State.

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.CI1 (2012) Community Infrastructure Provision
- 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.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.HE1 (2012) Heritage

Part 2 Policies:

- DMCI 2 New Community Infrastructure
- DMEI 4 Development on the Green Belt or Metropolitan Open Land
- DMEI 7 Biodiversity Protection and Enhancement
- DMEI 9 Management of Flood Risk

LPP 2.2	(2016) London and the wider metropolitan region
LPP 2.6	(2016) Outer London: vision and strategy
LPP 3.2	(2016) Improving health and addressing health inequalities
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.3	(2016) Sustainable design and construction
LPP 6.9	(2016) Cycling
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
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LPP 5.13	(2016) Sustainable drainage
LPP 5.18	(2016) Construction, excavation and demolition waste
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 7.21	(2016) Trees and woodlands

- LPP 7.3 (2016) Designing out crime
- LPP 7.5 (2016) Public realm
- LPP 7.6 (2016) Architecture
- LPP 8.2 (2016) Planning obligations
- LPP 8.3 (2016) Community infrastructure levy
- LPP 8.4 (2016) Monitoring and review

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **18th November 2020**

5.2 Site Notice Expiry Date:- **18th November 2020**

6. Consultations

External Consultees

Public Consultation

This application has been advertised by way of site notice and a press advert. To date no letters of representation have been received from local residents.

GLA

1 On 26 October 2020, the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the Category 3D of the Schedule to the Order 2008: "Development - (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building."

3 Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 0.9-hectare application site is located within Brunel University's Campus, which operates from a 78-hectare site located approximately 1 kilometre to the south of Uxbridge town centre, within the London Borough of Hillingdon. The application site forms part of a major developed Green Belt site and comprises an existing hard-surfaced car park located to the south-east side of the Campus. As shown below in figure 1, existing University buildings adjoin the application site including the recently built (Advanced Metal Casting Centre) AMCC 1 and AMCC 2 buildings.

6 The site currently contains in the region of 60 carparking spaces and a small (466 sq.m.) single storey maintenance building, and is located approximately 2.7 kilometres from the Transport for London Road Network and approximately 0.5 kilometres from the Strategic Road Network. The nearest London Underground station is Uxbridge (served by Metropolitan and Piccadilly Line services), located approximately 1.5 kilometres north of the site. The site is served by 4 bus routes at a regular frequency with stops located on Kingston Lane to the east of the site. Consequently, the site has a public transport accessibility level (PTAL), which ranges from 2 to 3 on a scale of 0-6b, where 6b is highest.

Details of the proposal

7 The proposal is for construction of a new research facility building, together with associated substation, bin stores, car parking, access and landscaping. The applicant confirms that it is the third phase of a high-profile project of national importance (known as - Advanced Metals Casting Centre - AMCC3, where AMCC1 and AMCC2 have been built on adjacent sites), and which would substantially improve research into the sustainability of automotive manufacturing.

Case history

8 AMCC1 and AMCC2 are the first and second phases of this project. Planning permission - LPA ref: 532/APP/2014/30 was granted for these facilities in 2014, which was supported by the former Mayor, (GLA ref: D&P/ 0300i).

9 A previous planning application in May 2019 (LPA Ref: 532/APP/2020/3198) proposed a similar development (known as AMCC3), was withdrawn, though the Mayor confirmed support in principle at Stage 1 (GLA Ref: GLA/ 0300n/ 01). It is worth noting that the current application has a much-reduced maximum height of 9 metres as compared with the withdrawn application which had a maximum height of 50 metres.

Strategic planning issues and relevant policies and guidance

10 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the 2012 Hillingdon Local plan: Part 1: Strategic Policies, and the 2016 London Plan (Consolidated with Alterations since 2011).

11 The following are also relevant material considerations:

- . The National Planning Policy Framework (2019) and National Planning Practice Guidance;
- . The Mayor's Intend to Publish London Plan (December 2019), which should be taken into account on the basis explained in the NPPF; and
- . On 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.
- . The Hillingdon Emerging Local Plan: Part 2, the public examination hearings for which was closed on 9 August 2018).

12 The relevant issues and corresponding policies are as follows:

- Green Belt London Plan; Mayor's Intend to Publish London Plan;
- Education London Plan; Mayor's Intend to Publish London Plan;
- Urban design London Plan; Mayor's Intend to Publish London Plan;
- Access London Plan; Mayor's Intend to Publish London Plan;
- Accessible London: achieving an inclusive environment;
- Sustainable development London Plan; Mayor's Intend to Publish London Plan;
- Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Transport London Plan; Mayor's Intend to Publish London Plan;

Mayor's Transport Strategy;

Principle of development

13 The application site is part of a larger area identified as Major Developed Land within Green Belt in Hillingdon's Local Development Plan, on which over 10 hectares of development has taken place since the University opened in June 1966.

14 Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to Green Belt and should not be approved except in 'very special circumstances'. According to paragraph 144 of the NPPF, when determining applications, LPAs should ensure that substantial weight is given to any harm to the Green Belt; 'very special circumstances' will not exist unless the potential harm to Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Policy 7.16 of the London Plan and Policy G2 of the Mayor's Intend to Publish London Plan stress the strongest protection should be given to the Green Belt and that inappropriate development should be refused, except in very special circumstances.

15 As set out in paragraph 145 of the NPPF, the construction of new buildings should be regarded as inappropriate development in the Green Belt. Exceptions to this which are relevant to the proposed redevelopment include:

- limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: not have a greater impact on the openness of the Green Belt than the existing development.

16 Having regard to the above exception test, the proposed development would constitute limited infilling on previously developed land. However, as the application site is currently a hard-surfaced car park with a small single storey maintenance building (shown in Figure 1 above), the proposed built form, in terms of height and massing will have a greater impact on the openness of the Green Belt than the existing situation (see the comparison table below). The proposed development does not therefore meet the above exception test and is therefore inappropriate

Green Belt development.

17 The applicant has therefore set out very special circumstances including academic benefits (advanced research, and infrastructure to support the growth of Brunel University and London's competitiveness in the global higher education market), substantial employment, inward investment (up to £56.5m), and sustainability benefits to justify the development. It further stresses that the proposed use needs to be co-located with the existing AMCC1 and AMCC2 buildings and the proposed use aligns with the University's Science Park, in which the site is located. The applicant also confirms that the project is one of National importance in relation to the potential economic benefits. The applicant's very special circumstances case therefore clearly outweighs the limited harm to openness that would be caused to the Green Belt by its proposals and the much-reduced height (9 metres) of the current application compared to the height of the earlier withdrawn application (50 metres) is also noted.

18 Policy 3.18 'Education facilities' of the London Plan states that the Mayor supports provision of further and higher education facilities to meet the demands of a growing and changing population, and in the text associated with Policy S3 'Education' of the Mayor's Intend to Publish London Plan recognises the range of undergraduate and postgraduate degrees that higher education in London provides and the vital part that universities play in ensuring Londoners have the higher order skills necessary to succeed in a changing economy. Policy S3 itself strongly supports the principle of new higher education development and requires proposals for education facilities to be in areas of identified need, in accessible locations, and next to parks or green spaces where possible.

19 Furthermore, the proposed learning and teaching centre, is in line with Policy 3.18 of the London

Plan and Policy S3 of the Mayor's Intend to Publish London Plan, and will enhance the provision of undergraduate and postgraduate education, and continuing professional development.

Conclusion: principle of development

20 The proposed development is inappropriate within Green Belt as it would have greater impact on openness than the existing situation and does not meet any of the exception tests in the NPPF. However, the applicant has set out a strong very special circumstances case including academic benefits, substantial employment, inward investment and sustainability benefits, to justify its proposal. These clearly outweigh the limited harm the application would cause to the openness of the Green Belt and the proposal therefore accords with Policy 7.16 of the London Plan, Policy G2 of the Mayor's Intend to Publish London Plan and the NPPF.

Urban design

21 Good design is central to all objectives of the London Plan and the Mayor's Intend to Publish London Plan.

Layout, form and massing

22 The layout, form and massing approach are consistent with the established Campus buildings and the proposed materials and building articulation are refined and consistent with the University's educational use. The proposal will be read as part of the wider campus in views from the Green Belt though it will have a greater impact on openness than the existing hard-surfaced car park. The proposed building will have a floorspace of 1,500 sq.m. and a maximum height of 9 metres. It is noted that this height is necessary due to the research equipment the building would accommodate. The proposed height is also consistent with the adjoining AMCC1 and AMCC2 buildings, which serve similar functions. The use of different materials to 'break up' the mass is supported, and the landscape design is well considered.

Architecture and appearance

23 The building has been designed to match the existing AMCC 1 and 2 buildings. The three buildings will therefore complement one another, each performing different functions linked to the AMCC research. Each of the AMCC buildings have a mix of grey brick and cladding, as well as panels with colours chosen from a limited available range. That said, the Council must secure key details of materials to be used to ensure the best possible build quality is delivered in the context of the Green Belt setting.

Fire safety and resilience

24 In accordance with Policy D12 of the Mayors' Intend to Publish London Plan, the applicant has submitted policy compliant fire safety strategy and the Council must secure all the measures proposed through appropriate conditions.

Inclusive access

25 Developments should be designed to meet the highest standards of accessibility and inclusion. Policy 7.2 of the London Plan and Policy D5 of the Mayor's Intend to Publish London Plan require design and access statements to explain how the principles of inclusive design, including the specific needs of disabled people, have been addressed. The proposal will offer a fully inclusive access to all users; though the location of the proposed 11 blue badge parking spaces must be revisited.

Sustainable development

Energy

26 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the of the Mayor's Intend to Publish London Plan, the applicant has submitted an energy statement. The energy strategy is generally policy compliant, however, the applicant is required to submit additional information related to overheating and cooling, maximising PV, futureproofing for district heating

network, heat pumps, and Whole lifecycle carbon assessment. Full details of the issues have been provided directly to the applicant and the Council.

Flood risk and green infrastructure

27 The site lies within Flood Zone 1. The approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and the Mayor's Intend to Publish London Plan Policy SI.12. Further details on attenuation storage volume values and calculation methods should be provided. Appropriately worded conditions in relation to flooding and sustainable drainage measures will be necessary to ensure compliance and delivery with Policies 5.12 and 5.13 of the London Plan and Policies SI.12 and SI.13 of the Mayor's Intend to Publish London Plan. The urban greening proposals are limited and should be improved.

Circular economy

28 The Mayor's Intend to Publish London Plan Policy GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 further states that the principles of the circular economy should be considered in the design of development proposals in line with the circular economy hierarchy. The Mayor's Intend to Publish London Plan Policy SI7 requires major applications to produce circular economy statements. The applicant should provide a circular economy statement which must follow the criteria set out in the Mayor's Intend to Publish London Plan Policy SI7 and the Circular Economy Statements Guidance, and this should be secured through a planning condition

Transport

Healthy streets

29 The proposed development has not addressed either Healthy Streets or Vision Zero objectives contrary to the requirements of the Mayor's Intend to Publish London Plan Policy T2. The applicant should identify appropriate improvements that should be secured by legal agreement.

Parking

30 The site currently contains around 60 car parking spaces, which the applicant proposes to provide elsewhere on the Campus. The Mayor's Intend to Publish London Plan Policy T6.2 recommends reducing car parking levels in order to improve the sustainability of the site in favour of public transport, walking, and cycling. The applicant is therefore advised to reduce the number of car parking spaces related to this application and ensure that any new spaces incorporate electric vehicles charging points (EVCPs) at the levels set out in the Mayor's Intend to Publish London Plan.

31 Furthermore, Intend to Publish London Plan Policies T4 and T6 require that a Car Park Design and Management Plan (CPDMP) is prepared and presented in support of an application. This should detail the management of blue badge parking spaces, which it is noted are remote from the three AMCC building entrances. Given the car parking is for general campus use, a site wide CPDMP should be established that builds on the permit system currently in place across the campus. This should then be secured as part of any consent.

32 A total of 20 cycle spaces are proposed against a policy requirement of 6 long and 2 short stay spaces. However, the application documents present differing levels of existing and proposed cycle parking for the site, and the submitted plans seem to suggest concentrating all provision in one part of the site potentially to the detriment of existing provision. This should be clarified, and all cycle parking should be designed and laid-out in accordance with the London Cycling Design Standards (LCDS) and should be fit-for-purpose, secure and well-located.

Travel plan, delivery and servicing and construction logistics plans

33 A travel plan has been submitted as part of the application submission, which will be linked to the

main campus travel plan. TfL officers note however that the presented information is now out of date and should be reviewed once the final level of car parking associated with this application has been agreed with a view to deliver a modal shift towards sustainable travel. The Council should then secure, monitor, enforce and ensure funding for the full travel plan through a S106 planning agreement. The submission of both the construction logistics plan (CLP) and the delivery and servicing plan (DSP) should be secured by condition. Mayoral Community Infrastructure Levy 2 (MCIL2), is charged at a rate of £60 per square metre of floorspace in the London Borough of Hillingdon.

Local planning authority's position

34 Hillingdon Council's planning officers are assessing the scheme possibly recommending approval to their planning committee early January 2021.

Legal considerations

35 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. 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

36 There are no financial considerations at this stage.

Conclusion

37 London Plan and the Mayor's Intend to Publish London Plan policies on Green Belt, education, urban design and inclusive access, sustainable development and transport are relevant to this planning application. The application does not comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out below; however, the possible remedies stated could address these deficiencies:

- Principle of development: Although the proposal for a new research centre building forms part of a major-developed Green Belt site, it is inappropriate development as it would have a greater impact on openness than the existing situation. The proposal does not meet any of the NPPF exception tests. However, very special circumstances including academic benefits, substantial employment, inward investment and sustainability benefits have been demonstrated that would clearly outweigh the limited harm that the proposals would cause. The proposal therefore accords with Policy 7.16 of the London Plan, Policy G2 of the Mayor's Intend to Publish London Plan and the NPPF.
- Urban design and inclusive access: The Council must secure details of materials to be used to ensure the best possible build quality is delivered in the context of the site's Green Belt setting. The approach to inclusive design is supported and must be secured by condition.
- Sustainable development: Further information is required in regard to energy, flood risk, green infrastructure and circular economy to accord with policies of the London Plan and the Mayor's Intend to Publish London Plan.
- Transport: Car parking should be reduced to support a shift to sustainable transport. Further information is required regarding the implementation of the Mayor's Healthy Streets and Vision Zero objectives, as well as cycle parking proposals. A site wide travel plan should be secured as well as full construction logistics, and delivery and servicing plans by appropriate conditions and a planning agreement.

HEATHROW SAFEGUARDING

We have now assessed the above application against safeguarding criteria and can confirm that we

have no safeguarding objections to the proposed development. However, we would like to make the following observations: Cranes Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, Cranes and Other Construction Issues (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>) Landscaping The development is close to the airport and the landscaping which it includes may attract birds which in turn may create an unacceptable increase in birdstrike hazard. Any such landscaping should, therefore, be carefully designed to minimise its attractiveness to hazardous species of birds.

GLAAS

No archaeological requirement

NATS

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

TFL

Summary of Key Issues

Car parking should be reduced to support a shift to sustainable transport. Further information is required regarding the implementation of Healthy Streets and Vision Zero objectives, as well as cycle parking proposals. A site wide Travel Plan should be secured as well as full construction logistics, and delivery and servicing plans by condition.

Site Location and Context

The site is located within the Brunel University Campus accessed via Kingston Lane, on land currently occupied by a 118 space car park. Existing university buildings and internal access roads bound the site on all sides. The site is located approximately 2.7km from the Transport for London Road Network (TLRN) and approximately 0.5km from the Strategic Road Network (SRN).

The nearest London Underground station is Uxbridge (served by Metropolitan and Piccadilly Line services), located approximately 1.5km north of the site. The site is served by 4 bus routes at a regular frequency with stops located on Kingston Lane to the east of the site. Consequently, the site has a Public Transport Access Level (PTAL) of 2 on a scale of 0-6b, where 6b is highest.

Healthy Streets

The presented proposals have not addressed either Healthy Streets or Vision Zero objectives contrary to the requirements of ItP Policy T2 (Healthy Streets). The applicant should identify appropriate improvement and secure by legal agreement.

Trip Generation and Impacts

The number of new full-time employees has been stated as up to 15. While no trip generation or assessment has been undertaken, it is not anticipated that there will be any strategic impact to vehicular traffic or public transport.

Parking

The proposal includes the retention of all 118 car parking spaces, either adjacent to the proposal or around the university campus. Policy T6.2 allows a maximum of 15 car parking spaces associated with 1500sqm of B1 office space. Therefore the applicant is strongly recommended to reduce car parking levels in order to improve the sustainability of the site in favour of public transport, walking, and cycling.

It is stated that five electric vehicle charging points (EVCPs) will be provided onsite equating to 10% of the overall parking provision, although these are not marked on the plans or consistent with the 118 proposed car parking spaces. EVCP provision should therefore be increased to 12 and marked on the plans.

Policy T4 (B), and T6 (G) require that a Car Park Design and Management Plan (CPDMP) is prepared and presented in support of the application. This should detail the management of blue badge parking which it is noted are fairly remote from the three AMCC building entrances. The applicant is urged to review this location.

Given the intended use of site car parking for general campus use, a site wide CPDMP should be established. It is noted that a permit system is in place throughout the campus so this should form the basis of the CPDMP to be secured as part of any consent.

A total of 20 cycle spaces are proposed against a policy requirement of 6 long and 2 short stay spaces. However, the application documents present differing levels of existing and proposed cycle parking for the site, and the plans seem to suggest concentrating all provision in one part of the site potentially to the detriment of existing provision.

All cycle parking should be designed and laid-out in accordance with the London Cycling Design Standards (LCDS) and should be fit-for-purpose, secure and well-located. It cannot be confirmed if the current cycle parking location and design achieves this, and details of cycle parking should be confirmed.

Travel Plan (TP)

A Travel Plan has been submitted as part of the application submission, which will be linked to the main campus TP. GLA officers note the presented information is now out of date and must be reviewed once car parking has been agreed.

It is suggested that there is wider review of TP objectives to include a meaningful reduction in car-based activity at the site and the inclusion of the University Car Park permit system and CPDMP in the TP process to deliver mode shift.

LBH should secure, monitor, enforce and ensure funding for the full Travel Plan through S106 agreement.

Delivery and Servicing and Construction Logistics Plan

Although both the Construction Logistics Plan (CLP) and the Delivery and Service Plan (DSP) have not been submitted with this application, it is required that they should be secured by condition. The latter may be achieved by requiring the existing DSP for the other two buildings that form part of the site to be amended.

Mayoral Community Infrastructure Levy 2 (MCIL2)

MCIL2 is charged at a rate of £60 per square metre of floorspace in the London Borough of

Hillingdon.

HISTORIC ENGLAND

Thank you for your letter of 17 December 2020 regarding the above application. On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

Internal Consultees

ACCESS OFFICER

Brunel University seek planning consent to construct a new Advanced Metals Casting Centre to fabricate and test prototypes made from molten metal. Reference has been made to the 2016 London Plan and its contained policies 3.1, 3.5 and 7.2. Policies D5 and D12 set out in the 2019 (intend to publish) London Plan have also been referenced. Whilst the supporting Design and Access Statement makes positive reference to Approved Document M to the Building Regulations, the Equality Act 2010 and BS8300, referencing inclusivity for staff, academics and research students, much of the facility will be inaccessible to disabled students and staff. The Equality Act 2010 seeks to protect disabled students in educational settings to ensure an equal learning experience on par with their non-disabled peers.

The DAS states that "accessible access provision will be provided where reasonable and practical- " which immediately raises a concern. All aspects of the learning experience to be delivered within this facility must be accessible to all students. It is considered unacceptable to exclude students on the grounds of disability and health and safety concerns. If non-disabled students would have access to the casting furnace area, the laboratories and the upper level decks, then provision must be made for the disabled students to benefit from the same experience. If disabled students are unable to participate fully in the academic syllabus, then the objective to achieve an accessible and inclusive facility will have failed. Further details are required on the following: Boulevard gradients; paving; seating; external lighting; soft landscaping; access to the casting furnace area, laboratories, upper level decks and workshop.

Conclusion: at present, I am not able to support this proposal as I consider the facility will likely exclude disabled students from fully participating. A meeting with me should be requested.

CASE OFFICER COMMENT:

The application proposes new buildings which will provide additional research and development space within the Science Park. There is currently a S106 in place which covers the entire Science Park and prevents the buildings within it from being used for educational purposes. This is covered within the "planning history" section of this report. This detail has been provided to the Access Officer who has stated objection relating to accessibility concerns for students and the objection has been withdrawn providing a head of term is included to ensure the new buildings are also not used for educational purposes. As such the scheme as is, is considered to be acceptable by the Access Officer.

CONTAMINATED LAND

1 Summary of Comments:

I have reviewed the contents of the following document which was submitted with the application:

· Document Title: BCAST AMCC3 Laboratories Ground Condition Statement; Ref: P300199-BDP-XX-XX-RP-S-0001 Rev P02; Dated 18/09/2020; Prepared by BDP Consultants Ltd

The above mentioned ground condition statement refers to an earlier combined phase 1 and phase 2 report produced by REC for a previous application at the Brunel University site.

The REC report provides details from an area of land which constitutes a significant proportion of land which is within the boundary of the proposed site.

I concur with details within the BDP statement which indicate:

"The site testing undertaken for that investigation is in close proximity to the site of the proposed infill extension and the results are sufficiently analogous to the recent AMCC3 site investigation to be considered representative of the ground conditions in that area of the site. It is not therefore considered necessary to undertake any further site investigation works specifically for the infill extension."

Notwithstanding the above, I recommend the following conditions and informative be applied to any forthcoming award of planning permission:

Condition: Discovery of Unforeseen Contamination.

If, during development, contamination not previously identified is found to be present at the site then no further development, (unless otherwise agreed in writing with the Local Planning Authority [LPA]) shall be carried out until a remediation strategy, detailing how the contamination will be dealt with, has been submitted to and approved in writing by the LPA.

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 Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

Condition: Imported Materials.

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. Note: The Environmental Protection Unit (EPU) must be consulted for their advice when using this condition.

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.

Informative: Asbestos.

Due to the age of the buildings, there is a possibility that asbestos will be present therefore, demolition and removal of any asbestos containing material (ACM) must be carried out in accordance with guidance from the Health and Safety Executive (see <https://www.hse.gov.uk/asbestos/index.htm>)

2 Reason for Refusal (if objecting):

N/A (subject to conditions)

3 Observations:

The LPA records contain an earlier site investigation at a representative proportion of the newly proposed site, the details of findings and recommendations within the report are now summarised as follows:

Asbestos

Results of laboratory quantification identified asbestos levels below limits of detection, therefore, the risk from asbestos is not expected to be unacceptable. However, given the historical site uses, in conjunction with proposed development consideration to the potential for asbestos is required to be given during construction activities.

Controlled waters

No unacceptable risks have been identified

Ground Gas

No unacceptable risks have been identified

Soils

Soil samples were recorded with elevated pH and thereby for the purpose of disposal would require to be highlighted as hazardous waste; the report recommends any selected receiving landfill should be informed accordingly.

FLOODING

Conditions proposed. A Flood Risk Assessment by BDP has been submitted by the applicant. The drainage network is private and owned and maintained in its entirety by Brunel. It is noted that a survey has been undertaken and this identifies poor condition drainage that this development will need to connect into, that needs repair and that it is not clear where this area discharges into the River Pinn or what condition the rest of the network to that point is. The proposed discharge rate for the 6814m² plus landscaping area is 2.5l/s. A green roof is proposed and supported for the infill specialist laboratory but not the larger research building. In addition two small rain gardens are included. Permeable paving as well as tanks are provided to restrict run off from this area up to and including the 1 in 100 year plus 40% climate change event. Exceedance routes are not clear at this stage and subject to further level information but finished flood levels are raised 150mm above surrounding ground. The overflow carparking is not indicated in areas of flood risk. However further detailed design is required to confirm the final layout as well as additional works to ensure the drainage network is a condition and suitable for this development therefore the following condition is requested:

Condition requested: Prior to commencement, (excluding demolition and site clearance) the details of a scheme for the provision of sustainable water management shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it manages water in the most sustainable ways and is compliance with the strategy set out in FRA report produced by BDP dated September 2020 which sets out the site will: Achieve a run off rate from the site of 2.5l/s Provided through the following SuDs elements: Green Roof, rain gardens, permeable paving and tanks. The responsibility for the drainage system lies with the university. Further details need to be provided on certain elements within the drainage design. Any changes to the strategy should be justified and evaluated and the final proposals must be integrated with provision of green

infrastructure, air quality and urban greening requirements to justify the most sustainable final solution is provided. Additional information should be provided on: Green roofs which were specified and further detail of these detailed design stage and Rain gardens Methods to minimise the use of potable water through i. incorporating water saving measures and equipment. ii. Collecting water for use and recycling iii. Safe access and egress must be demonstrated - any above ground storage and or overland flooding or flows paths should be mapped, (please include depths and velocities and hazards) above the 100, plus climate change. Relevant Policies Hillingdon Local Plan: Part 1- Strategic Policies Policy EM6 Flood Risk Management in (Nov 2012), Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 1 Living Walls and Roofs and on site vegetation (Jan 2020) Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 9 Management of Flood Risk (Jan 2020) Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 10 Water Management, Efficiency and Quality (Jan 2020) London Plan Policy 5.12 Flood Risk Management (March 2016) London Plan Policy 5.13 Sustainable Drainage (March 2016), and London Plan Policy 5.15 Water use (March 2016). National Planning Policy Framework (June 2019), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

HIGHWAYS

Site Characteristics & Background

The proposal comprises of a new Automotive 'high performance alloys' research building (AMCC3) which would total approximately 1500m² (GIFA) and is to be located within the southernmost eastern corner of the University campus. The proposal is to be co-located with the AMCC1 & 2 research buildings. The scheme would also involve the demolition of the nearby existing 'Gardiner' building scaled at 484m² (GIFA).

The building would replace an existing area consisting of 118 parking spaces. 65 spaces are to be re-provided adjacent to the new build with 53 spaces distributed elsewhere within the campus. Hence it is proposed that there would be no net loss of overall parking provision as a consequence of the proposal. It is understood that the level of student patronage is to remain unchanged, as per the previously withdrawn application (532/APP/2019/1637) for a new research building, however the facility would employ 10-15 FTE new staff in addition to 10 existing FTE staff who would be present on-site at any one time.

The only vehicular access into the campus site is from Kingston Lane and there are currently 1936 car parking spaces provided across the campus as a whole which is 'capped' to a maximum parking level of 2088 spaces secured by a s106 legal agreement as per the original master-plan of 2004. These spaces are subject to a parking management regime during core University hours (8am to 4pm) which includes permit controlled and reserved spaces with an element of pay & display provision. These spaces are uncontrolled outside of the core hours and are therefore available to the general public.

The campus is located 2km to the south of Uxbridge Town Centre and exhibits a public transport accessibility level (PTAL) rating of 1a which is considered as low and therefore heightens dependency on the use of private motor transport.

Parking Provision

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 overall campus parking provision is currently operating below the maximum 'cap' of 2088 spaces as agreed within the secured master-plan in 2004 with 1936 on site spaces in play. The applicant states that as a result of prior site planning permissions, there are a total of 69 consented spaces not implemented as yet hence the current total 'existing + consented' on-site quantum

should theoretically amount to 2005 (1936+69) spaces. If necessary, this would therefore allow scope for further additional new spaces to be provided up to the capped limit of 2088. The proposal intends to replace all existing spaces (118) lost to the redevelopment with no envisaged 'net' uplift. 65 spaces are to be re-provided adjacent to the new/reconfigured build with 53 spaces distributed elsewhere within the campus. These areas include the 'Wilfred Brown' Car Park, Eastern Gateway gravel car park and to the rear of 'Elliott Jacques' Building with 18,34 & 1 space re-provided respectively. The parking arrangement in proximity to the application site and the redistributed spaces located at the above locations within the whole campus site are considered satisfactory for the purposes of this proposal.

On the assumption that the overall campus student patronage is not proposed to vary together with the moderate uplift in staffing numbers related to the proposal, there is no measurable concern related to the replacement of spaces without an increase in overall site provision. However, a parking management arrangement is recommended in order to ensure that the 118 rearranged spaces are utilised for their intended purpose. This would be achieved via an appropriate planning condition.

Electric Vehicle Charging Points (EVCP's)/Disabled Compliant Bays

Within the overall reconfigured quantum of 118 spaces, there is a requirement for approximately 10 disabled compliant spaces and 6 EVCP's (active & passive) and in the case of the latter, 5 spaces are indicated in total which should be rectified. This rectification together with the disabled compliant provision should be secured via planning condition.

Cycle Parking

A total of 759 cycle spaces are in place for the whole campus.

Provisions in line with LP 2016 minimum standards should be as follows:-

. 'Long Stay' provision of 1 space per 4 staff & 1 space per 20 students.

. 'Short Stay' provision of 1 space per 7 students.

A total of 20 cycle spaces have been indicated as being specifically allocated to the proposal. As a maximum of 25 staff would be operating within the building, this quantum of provision exceeds minimum standards and is therefore considered acceptable.

Vehicular Trip Generation

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.

As the overall site parking provision is to remain unchanged, it is envisaged that the proposal would not produce a measurable variation in overall traffic generation. Hence any marginal fluctuation in activity can therefore be absorbed within the local road network without notable detriment to traffic congestion and road safety.

Operational Servicing Requirements & Internal Road Layout/ Pedestrian Permeability

A framework servicing/ delivery plan should be conditioned accordingly with the aim of ensuring that internal and external site conflicts are avoided/minimised. As the frequency of service-related activities is likely to remain comparable to the existing 'research building' use, the principle of operation is therefore considered to be acceptable. Details of servicing and access including for emergency services and waste collection access have been submitted and broadly conform to the Department for Transport's (DfT) - Manual for Streets (MfS) (circa 2007) best practice for road and parking layouts with vehicular and pedestrian site permeability to internal and external destinations being maintained. The designs are therefore considered broadly workable as presented.

Travel Plan (TP)

The extant University 'whole site' TP should be maintained and encompass the proposal as per the submitted details for the AMCC3 rebuild. This is confirmed by the applicant and an indicative TP has

been submitted which is considered broadly fit for purpose.

The TP aims to provide a coherent and unified approach to achieve a modal shift away from the 'single occupancy' private motor car thereby leading toward a sustainable personal travel mode to and from the site. By design, the TP represents a long-term strategy for managing travel modes for all users of the site hence it will need to be secured under planning condition. This will allow for a review mechanism in years 1, 3 and 5 following site occupation which will help ensure compliance to the sustainable travel mode 'SMART' targets as set within the submitted action plan. There are no further observations.

Construction Logistics Plan (CLP) and Phasing Regime

A full and detailed CLP will be a requirement in order to help address the constraints and sensitivities of the internal and external local road network. This will assist in avoiding/minimising potential detriment to the internal campus roads and public realm.

Any phasing regime, if applicable, should be submitted with very clear and concise details at the application submission stage to allow for an informed decision to be made on the phasing methodology.

Conclusion

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

PLANNING POLICY

The application form incorrectly refers to B1(b). It needs to be resubmitted as E1 and then conditions agreed restricting the use of the site to: 'for research and development of products or processes being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.' Subject to the above, the Planning Policy Team would not raise any objection to a research building being located at Brunel University.

LANDSCAPING

This site is centred on a car park in the centre of Brunel University's Science Park, in the south-east corner of the campus, off Kingston Lane. The car park is situated between the Russell the Eliot Jaques. The external spaces associated with the car park and building perimeters were landscaped, with tree planting associated with the earlier phases of development. There are no TPO's or Conservation Area designations affecting the site. COMMENT A tree report has been prepared by the Landscape Partnership which has identified and assessed 81 individual trees and a group which are on, or close to, the site. There are no 'A' grade trees. 20 trees are category 'B' - whose condition, value and predicted useful life make them worthy of retention. 8 trees are category 'U' whose poor condition justifies their removal in the interests of sound management. The remaining trees are category 'C' - whose condition and value poses less of a constraint on development.

ARBORICULTURAL IMPACT ASSESSMENT (Landscape Partnership Report, Section 5) 36 trees will be removed to facilitate the development, of which 6 are 'B' grade with the others all 'C' or 'U'. 5 'U' grade trees will be removed for arboricultural reasons. Two further trees will be affected by the development due to encroachment within their RPA's (root protection areas). The tree protection details and arboricultural method statement are thin and the arboricultural strategy drawing ref. TLP-603 is unclear regarding the tree protection fencing and alignment.

ECOLOGICAL IMPACT ASSESSMENT, by The Landscape Partnership In chapter 6, it is noted that

significant ecological enhancement of this site is not possible, however, native species have been incorporated into the landscape design, with species rich wildflower grassland specified and green-roofed structures within the landscape. Bird and bat boxes will also be installed. No further ecological enhancements are recommended.

DESIGN & ACCESS STATEMENT (By Oobe) The landscape design objectives and landscape masterplan concept are set out in chapter 6 of the D&AS. Four character areas; green boulevard, green street, wildlife garden and academic square are described. The proposals aim to contribute to local green infrastructure in accordance with the GLA's Urban Greening Factor guidance (06.1). A provisional score of 0.319 has been achieved, compared with a target figure of 0.3 for commercial developments. The design report incorporates rain gardens and illustrates the level changes across the site. A lighting strategy including uplift trees is described. The circulation strategy through the site is set out in a circulation diagram designed to accommodate the needs of all users (chapter 10). Hard and soft landscape details, including a palette of hard materials, street furniture and examples of planting palettes are provided in chapter 11. Landscape detail sheets, by Oobe, include an illustrative planting strategy with final details to be confirmed.

RECOMMENDATION No objection subject to pre-commencement condition COM8 and conditions COM9 (parts 1,2,3,4,5 and 6) and RES10.

URBAN DESIGN AND CONSERVATION

The application seeks permission to construct a new research building including an infill building with the redevelopment of an existing building together with associated substation, two bin stores, car parking, access and landscaping. There have been a series of pre-application discussions regarding the development where a number of design concerns have been raised. Some amendments have been made to overcome these concerns, but it is now clear that further changes may start to compromise the buildings ability to function. The proposed BCAST 3 is a functional building that has a light industrial aesthetic which is proposed to be built on the car park between Eliot Jaques and the Russell buildings.

Attempts have been made to lessen its impact by reducing its height, volume, footprint as well as its positioning on the proposed development site. It is understood that the applicant's requirements for process driven research has largely established the design, layout, height and volume of the development. There are still a number of design concerns, particularly with the cramped nature of development and its closeness to the Eliot Jaques and Russell buildings. It is appreciated, however, that the building has now been reduced to such an extent that any further reduction would likely compromise the operations of the facility. Efforts have been made to mitigate some of the harm by increasing the landscaping around the development along with the provision to some green walls to help 'soften' the appearance of the block and improve its setting.

Despite the design concerns it is appreciated that the proposal also provides public benefits that would need to be taken into consideration and put into the planning balance. Should the application be minded for approval than I would suggest that conditions are attached requesting samples of the external facing materials, signage and landscaping.

ENERGY AND SUSTAINABILITY

I have no objections to the proposed development subject to it proceed in accordance with the approved plans and the following condition in relation to living walls/screen.

Condition

Prior to above ground works, a plan showing the incorporation of living walls/screens into the development shall be submitted to and approved in writing by the Local Planning Authority. The plan

shall show how planting will be incorporated into at least the southern elevation and covering a sufficient area to be of value to screening the building and providing an ecological benefit (through the inclusion of nectar rich planting). The development must proceed in accordance with the approved plan.

Reason

To ensure the development contributes to sustainable design and enhances opportunities for wildlife in accordance with Policy EM7 of the Local Plan Part 1.

I have no objections to the approaches to ecology or energy and no further comments to make.

NOISE

The NIA report is 17 pages, with nine pages of main text, including some tables and figures. The purpose of the NIA is stated in the introductory section as follows:

"The purpose of the assessment is to determine the existing ambient background noise level representative of the worst affected dwellings to the proposed development. Based on this level, limits will be set on the sound pressure level from plant units at the facades of nearby receptors. receptors."

This is as we would expect. The NIA actually goes further and presents an outline assessment of noise generated from the operation of the building - in terms of the manufacturing machinery as opposed to the building services plant - and also considers the surrounding University office buildings as noise-sensitive receptors. Since, however, the latter are not a concern for LBH, the NIA is not commented on in this regard.

Overall, the NIA does cover the required elements and the limitations are broadly in keeping with its outline nature, whilst it references the most relevant British Standard, i.e. BS 4142. There is no reference to any policy, however, nor the Council's Noise SPD1, whilst there are considered to be question marks over the sufficiency of the survey data, and, arguably, the University's Halls of Residents could have been included as a noise-sensitive receptor (closer than the nearest dwellings). However, the adopted criterion is relatively stringent, and the risk of potentially significant impact is considered to be very low, and thus we are inclined to agree with the proposed noise rating level limits and the conclusion that, "assuming that plant and machinery adhere to these limits there will be a low risk of complaints from nearby noise sensitive receptors. receptors."

The NIA is discussed in further detail below taking each section (following the Introduction) in turn. Our recommendations are presented in Section 4 of this Memo.

Site Description

Despite being Section "3", this section follows Section 1. It correctly identifies the nearest dwellings as those few, 2-storey properties on Kingston Lane, next to the Hillingdon Pentecostal Church. As mentioned above, the University's office buildings are also identified, which surround the proposed new building; however, there is no mention of the University's Halls of Residence, which, whilst more remote than the offices, are closer than the nearest dwellings. It would seem prudent to include these in the future assessment of plant noise (see Section 4 of this Memo).

The "primary contributors to background noise levels on site are taken to be the Traffic noise from Kingston

Lane" and "Noise from activities at the Brunel University Sports Park". Since, however, background sound levels are defined as the level(s) exceeded for 90% of the time - i.e. the underlying levels/conditions present for the majority of the time - these do not seem the more likely sources in this regard, especially at night.

Environmental Noise Survey

The survey was conducted during November 2018, and so is not subject to any uncertainty associated with the current conditions during the pandemic. We do have concerns, however, regarding the duration and location. Despite the sound level meter being installed at a secure location, the survey fell short of even a single 24-hour period. This means that there are no data with which to check how the levels may vary on different days or under different meteorological conditions.

The survey location was also elevated on the roof of the AMCC 1 building, and so whilst it was at a similar distance from Kingston Lane as the rear of the nearest dwellings, it was potentially more exposed to surrounding sources of ambient and background sounds. An additional measurement was taken closer to the dwellings, and whilst this seemingly resulted in a similar level to that obtained at the main survey location, the fact that it was clearly a brief, individual measurement, during the morning traffic peak-hour, road-side of the properties (and not to the rear, where they would be most sensitive to noise) renders it meaningless.

However, the potential significance of these concerns is linked to both the adopted criterion and the risk of impact(s). As it is, a generally stringent criterion has been adopted (as discussed below), which is likely to account (though not by design) for the potential uncertainty of the survey data, whilst, given the distance and screening between the scheme and the dwellings, the risk of significant impact is considered very low.

Helpfully, a time-history trace of the main results is presented, which, crucially, doesn't show any "bottoming-out" or "plateauing" of the data, which might have been a sign of a local source or sources (such as building services plant) that wouldn't have been relevant to the conditions at the dwellings.

The operating hours of the building or associated plant appear to be unknown at this stage, and so consideration has been given to both daytime and night-time conditions.

The data have been processed to determine the modal values for the day and night-time periods. This would normally be done, based on the example in BS 4142, using 15-minute period levels, rather than the adopted 5-minute period levels; however, as stated in the NIA, there is no fixed requirement in this regard, and the approach is considered acceptable.

The daytime and night-time background sound levels have been determined to be 47 dB and 35 dB, respectively. Whilst these are broadly as we would expect, we can see the conditions being lower at the rear of the properties; however, this is not necessarily significant on account of the adopted criterion, as discussed below.

Noise Break-out Assessment

This section represents additional scope to that defined in the introductory section, as mentioned above. Whilst the assessment is outline in nature, and only covers the manufacturing machinery and not the building services plant, it helps to provide context/scale to the potential for noise impact(s).

Since the actual machinery is apparently unknown, the assessment is based on measurements within the AMCC 1 building, which appears to represent a worst-case approach. And whilst operating hours also seem to be unknown, the assessment appears to be based on the presumption of daytime operation only (which would seem reasonable).

Not surprisingly, and despite the generally worst-case approach, a very low level is calculated at the nearest dwellings (some 180 m away, with no line of sight).

In the absence of identifying the Halls of Residence as noise-sensitive receptors, no assessment is presented in this regard. However, despite being closer than the dwellings, they are still remote and would seemingly be screened by intervening buildings, such that, at least on the basis of daytime operations, sound levels are likely to be sufficiently low.

Noise Rating Limits

It is stated that, "In addition to the noise breaking out from within the building, there will be a number of plant units which are associated with AMCC3. The data for the proposed plant is not available at this time, the operational hours of these plant units is also unknown .." Accordingly, daytime and night-time noise emission limits are proposed, which is as we would expect.

Notably, there is no reference to the Council's Noise SPD. Instead, and it's not clear why, the criterion of 10 dB below the background sound levels has been adopted. Since, however, this is more stringent than the default requirement of the SPD, this is considered acceptable. Whilst, due to the potential uncertainty associated with the survey data, this is perhaps also a necessity.

It is stated that, "These noise levels [i.e. the limits] have taken into account contribution of both the levels of the noise from machinery within AMCC3 and the plant units together. It has been assumed that activity noise from the activities within AMCC3 will only take place during day time hours. hours." Since, however, the same criterion/approach is applied to the day and night-time periods, these statements are confusing, whilst it is not clear if the limit(s) are intended to be applied to both sets of sound sources. In the next, final section, however, it is indicated that the limits apply to both (i.e. all such sources).

Conclusion

This section comprises two paragraphs. The first summarises the proposals and purpose of the NIA, the second is as follows: "The assessment has indicated that the maximum rating level of the proposed plant in line with the provisions of BS 4142: 2014. As such, assuming that plant and machinery adhere to these limits, the assessment indicates that there will be a low risk of complaints from nearby noise sensitive receptors. receptors."

Strictly, BS 4142 received minor amendments in 2019, and is now referred to as BS 4142:2014+A1:2019; however, this is not significant. Also, strictly, since 2014 the Standard no longer determines the likelihood of complaints (though it can be used for complaint investigations), but rather the potential for adverse impact. Notwithstanding this, we are inclined to agree that, "assuming that plant and machinery adhere to these limits there will be a low risk of complaints from nearby noise sensitive receptors. receptors."

RECOMMENDATIONS

Rather than revise the NIA, and since a condition would be required in any case, we would recommend a condition along the following lines should LBH be mindful to grant permission:

- A detailed assessment to be undertaken to confirm the scheme to control machinery and plant noise emanating from the site. The site noise is to be determined in accordance with BS 4142, and standard calculation procedures such as those in ISO 9613 and BS EN ISO 12354, as required, and shall be no higher at the nearest residential accommodation (including dwellings and Halls of Residence) than the relevant "Plant Noise Rating Level Limit" presented in Table 7.1 of the MACH Acoustics Ltd Noise Impact Assessment report (dated 18/09/2020). Full details to be submitted to, and approved by, LBH.

AIR QUALITY

The traffic associated with the proposed development will affect the Uxbridge Air Quality Focus Area, originating traffic emissions which will add to current exceedances. As per the new London Plan, developments need to be neutral as minimum and positive in Focus Areas, contributing to the

reduction of emissions in these sensitive areas.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019- 2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London

Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan Intent to Publish version (December 2019) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

The trip generation rates for the proposed development were not provided. However, it is noted that there will be no increase in the level of parking. Analysis of the Air Quality report submitted to support the planning application indicates that the proposed development is not anticipated to result in a change in AADT flows of more than 73 per day or significantly affect average speeds on the local road network. As such the proposed development is anticipated to meet the relevant air quality neutral criterion of no increase in emissions above the current use.

Given the additional information provided in the Transport Assessment and confirmed by LBH Highways, it is anticipated that when the site is fully operational there will be a maximum of 15 - 25 staff using the facility at any one time. It is expected that around 10 staff will be existing personnel at the University with around 10 - 15 new staff. Some of these staff would drive, but some would use other modes of transport. There would be occasional deliveries made by good vehicles to the building, which will be coordinated with the existing AMCC1 and AMCC2 research buildings as much as possible.

The transport consultation response states that 6 EVCP's (active & passive) are needed which is assumed to be accepted by the Applicant. It is also noted that the University has committed to a Travel Plan and there is already one in operation for the campus. In this context and given the extremely low probability of additional vehicles on the network (assumed additional 5 to 10 AADT, given the nature of the application site the use of public transport is extensive), no further action is required.

Observations

In addition, an Air Quality condition is required to develop and implement a Low Emission Strategy. See text below.

Condition Air Quality - Low Emission Strategy

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall address

- 1) the fleet composition serving the proposed development to be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards.
- 2) the supply of energy to the proposed development. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements;

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.

- 3) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with a minimum of the number of charging points required in the London Plan.
- 4) a clear and effective strategy to encourage staff / users to
 - a) use public transport;
 - b) cycle / walk to work where practicable;
 - c) enter car share schemes;

d) purchase and drive to work zero emission vehicles.

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 DME1 14 of the emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, Mayor's Intent to Publish London Plan Policy S11, and paragraph 170 of the National Planning Policy Framework (2019).

Conditions - Reducing Emissions from Demolition and Construction

A No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

Reason: Compliance with London Plan Policy 7.14 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

B All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority.

The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

Context

The proposed development is within an Air Quality Management Area and will affect identified Air Quality Focus Areas. Air Quality Focus Areas are defined by the GLA as areas already suffering from poor air quality where prioritisation of improvements is required. This is supported by:

Local Plan Part 2 Policy DME1 14

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:

i) be at least "air quality neutral";

ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and

iii) actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

BUILDING CONTROL

I have checked and attached the comments for this application below:

· This fire risk assessment has been reviewed as submitted, however it is not considered the final fire risk assessment. Design for means of escape, active/passive fire measures and access for the fire services will be subject to change as the scheme progresses and therefore a final risk

assessment will be required to be submitted along with the Building Control application for review.

- This fire risk assessment appears to have been produced by a suitably qualified assessor who have attempted to address the standards of Paragraph B within the London Plan Policy D12 (Fire Safety)

- These comments do not prejudice any formal comments made by the London Fire Emergency Planning Authority (LFEPA). A consultation to the LFEPA will be made as part of the Building Control application process.

- The final Fire Risk Assessment will need to be checked by a suitably qualified Fire Safety Specialist in order to discharge the Policy D12 planning condition and any costs to be recovered

- The principles of the submitted Fire Strategy Report shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approved details.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The whole of the application site is designated as Green Belt. The main policy issue in relation to this development is considered to be the principle of additional development within the Green Belt and its impact on the openness, character and appearance of the Green Belt.

GREEN BELT

The NPPF (2019) sets out the national planning policy approach to development in the Green Belt. It states that planning authorities should continue to consider the construction of new buildings in the green belt as "inappropriate". However the NPPF notes that certain forms of development can be considered as being 'not inappropriate' provided they preserve its openness and do not conflict with the purposes of including land within it.

Paragraph 145 lists these exceptions. Of relevance to the proposed development, this includes:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) 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;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing

development; or

- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning

Although the NPPF no longer refers to major developed sites, paragraph 145 states that limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, would not constitute inappropriate development in the Green Belt.

London Plan (March 2016) policy 7.16, and Publication London Plan policy G2 (December 2020) and the NPPF (2019) confirm that the strongest protection should be given to the green belt and that inappropriate development should be refused, except in very special circumstances.

Policy EM2 of the Local Plan: Part 1 (2012) confirms that any proposals for development within the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

Policy DME1 4 of the Hillingdon Local Plan : Part 2 - Development Management Policies (March 2020) confirms that only predominantly open land uses will be considered acceptable within the Green Belt and that planning permission for other uses will not be granted.

Policy DME1 4 of the Hillingdon Plan : Part 2 - Development Management Policies (2020) states:

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

On balance it is therefore considered that the proposal constitutes inappropriate development. The applicant sets out 'very special circumstances' to justify such development. These relate to the substantial employment, inward investment and sustainability benefits of the proposals, as detailed below.

The proposed development would play an important role in ensuring that the University stays at the forefront in engineering research. The facility would directly employ 10-15 FTE staff, who would be transferred from the existing University research projects at the campus. However, given the nature of the proposed research, there will be substantial wider opportunities for job creation and investment.

The project is also one of National importance in relation to the potential economic benefits. The UK Government's vision for the future is a mixed and balanced economy, where manufacturing activities complement services to deliver the widest possible range of economic and social benefits. Manufacturing plays a key role in rebalancing the economy. It will create a more resilient UK economy which is less vulnerable to sector specific shocks, and will improve the UK's capability to take advantage of the new opportunities which may arise as a result of anticipated changes in global demand.

The materials industry in the UK has an annual turnover of £200bn, contributes 15% to the country's GDP, employs 1.5 million people and supports around 4 million more jobs. The Engineering and Physical Sciences Research Council has identified "understanding and designing of new materials for new applications" as a top priority for scientific and technological breakthroughs by 2050, since it underpins most other strategic challenges facing the UK over the next 50 years. Most recently, advanced materials have been identified as one of the Eight Great Technologies for favourable government support. The proposed development facility directly related to this nationally strategic project.

However, the UK's research capacity and international visibility in this area has declined dramatically, with the UK rapidly falling behind the other G8 countries. There is, therefore, an urgent need to reinforce metallurgical research for high value manufacturing in the UK, and the proposed BCAST3 facility will be a specific investment dedicated to achieving this aim.

The proposed research would release sustainability benefits of national and international importance. The proposed research is aimed at producing more efficient metal alloys, leading to far less waste in terms of materials and energy.

In addition, it is noted that the development would be located in Brunel University's Science Park. Although the Science Park forms part of the University's campus, a legal agreement and conditions preclude most of the buildings at the Park for anything other than scientific research and light industrial production or manufacture, which is dependent research or development. The proposed use is similar to research and development facilities established on the Science Park and is therefore considered appropriate at this location.

Officers consider that the benefits, when weighed against the drawbacks of the proposed development are significant and therefore very special circumstances weighing in favour of the proposal exist in the case of the proposed development. The GLA shares this view and has stated that there are very special circumstances that exist to justify the development proposed. The proposal is therefore considered acceptable in principle.

Notwithstanding the above, in assessing the application, it will be necessary to determine whether material planning benefits outweigh any planning objections or potential harm, relating to visual and landscape impacts, noise and disruption during operations, air quality, traffic movements, duration of operations and ecological impacts.

7.02 Density of the proposed development

Not applicable to this application.

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

ARCHAEOLOGY

Policy 7.8 of the London Plan (March 2016), Policy HC1 of the Publication London Plan (December 2020) and Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) seek to ensure that areas which are identified as

being of archaeological interest are protected. The application site is not located within an area of archaeological priority or interest and notably Historic England (GLAAS) have raised no objections to the current proposals. As such the application is considered acceptable.

CONSERVATION AREA AND LISTED BUILDING CONSIDERATIONS

Policy 7.8 of the London Plan (March 2016), Policy HC1 of the Publication London Plan (December 2020) and Policy Policy DMHB 1, DMHB 4 of the Hillingdon Local Plan Part Two - Development Management Policies (2020 seek to ensure that development is designed to protect or enhance the historic environment.

The Urban Design and Conservation Officer notes that the application site is not in a designated conservation area. The nearest conservation areas are The Greenway to the north east and Hillingdon Village to the north west. These are located some distance from the application site and it is considered that neither of these areas will be affected by the proposed development.

Within the University Campus, the nearest listed building is The Lecture Theatre building which is some distance from the application site. It is considered that the new development would have little impact on the setting of this structure. Outside the campus, the nearest listed buildings are the Gate House and Chapel at Hillingdon Cemetery, which are also set well away from the site and are screened by the mature trees that fringe the cemetery. The Conservation Officer considers that there would be no adverse impact on their setting.

It is therefore considered that the proposal would not have a detrimental impact on the setting of heritage assets, in accordance with to Policy 7.8 of the London Plan (March 2016), Policy HC1 of the Publication London Plan (December 2020) and Policy DMHB 1, DMHB 4 of the Hillingdon Local Plan Part Two - Development Management Policies (2020.

7.04 Airport safeguarding

Paragraph 95 of the National Planning Policy Framework requires that planning decisions promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

Policy DMAV 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

B) In consultation with the Airport Operator, the Council will ensure that:

- i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and
- ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

Given the height of the proposed development, there are so air safeguarding concerns raised and no objections received from statutory bodies.

Subject to the conditions noted above, the proposed development would not be considered contrary to Policy DMAV 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the National Planning Policy Framework (February 2019).

7.05 Impact on the green belt

This issue has been partly addressed in part 7.01 of the report.

London Plan (2016) policy 7.16 , Publication London Plan Policy G2 (December 2020) and the NPPF (2019) confirm that the strongest protection should be given to the green belt and that inappropriate development should be refused, except in very special circumstances.

Policy EM2 of the Local Plan: Part 1 (2012) confirms that any proposals for development within the Green Belt will be assessed against national and London Plan polices, including the very special circumstances test.

Policy DMEI 4 of the Hillingdon Local Plan : Part 2 - Development Management Policies (March 2020) confirms that only predominantly open land uses will be considered acceptable within the Green Belt and that planning permission for other uses will not be granted.

The site, which is situated within the Green Belt and a Green Chain, falls within an area hardstanding within the car park of the Science Park and the smaller of the two buildings would form a link between the Gardiner and the existing BCAST building. The Design and Access Statement provides a number of context elevations which are used to assess the visual impact of the proposed development. The document illustrates that the site is within the existing developed 'Science Park' of the University campus and is located within an area that has an urban fringe 'Office Park' character. The public footpath (Nursery Lane), which passes within close proximity to the south of the site, offers direct views of the buildings within the Science Park.

The link between the Gardiner and the existing BCAST would be constructed after the partial demolition. The larger of the two buildings would be set with the Science Park car park and would be surrounded by buildings to the north, east and west. The main building would be set against a back drop of existing fairly modern mainly 2 storey buildings within the Science Park and would be relatively well screened from Kingston Lane by operation BCAST 1 and 2 buildings, existing trees and proposed planting. It is therefore considered that the building could be located in this position without a significant impact on the appearance of this part of the site and its immediate context. However, it will be necessary to ensure that any proposed landscaping around the building is sufficient in order to provide a visual and physical separation between the existing and proposed buildings which also contributes to the setting of the buildings and is an attractive space for those who interact with the Science Park and the wider University campus.

Overall, given that the proposal involves a building in an area of the campus that has been previously developed, the existing landscape character, and the proposed planting strategy, it is considered that the visual impacts of the proposal are unlikely to be of significant detriment to the character of the area, or the perception of openness of the Green Belt. It is therefore considered that there would not be an unacceptable impact on the amenity and openness of the Green Belt. The proposals are therefore considered to be in accordance with Saved Policy EM1 of the Local Plan : Part 1 (2012), DMEI 4 of the Local Plan : Part 2 -

Development Management Policies (2020), London Plan Policy 7.16 (March 2016) G2 (Publication London Plan December 2020) and the relevant NPPF (2019) policies.

7.07 Impact on the character & appearance of the area

Paragraph 131 of the NPPF (2019) requires that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policy 7.6 of the London Plan (March 2016) requires new developments to make be of the highest architectural quality and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.

Policy D1 of the Publication London Plan (December 2020) requires all development to make the best use of land by following a design led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) re-emphasises the importance of good design in new development by;

- A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure;
- B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space;
- C) safeguarding the development potential of adjoining sites and
- D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 of the Local Plan: Part Two (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The building concept essentially follows that of the first two AMCC phases, consisting of clear span laboratory workshop space along with small support office and welfare facilities hub. However, AMCC3 differs from the earlier phases in that the research area is divided into two buildings one a workshop the other and specialist laboratory with ancillary support offices connecting to a reconfigured Gardiner Building.

The workshop type research space is designed to accommodate the industrial sized equipment arranged to achieve industry-standard safe operating spaces. The second smaller building is divided into individual specialist laboratory spaces with environmentally controlled conditions which houses highly sensitive electron microscopes and calibrated instrumentation machines.

The arrangement of the two buildings has been established to provide the best connectivity with AMCC 1 and AMCC 2 laboratory facilities and the research community within the Science Park. Finally the proposal requires a modification to the Gardiner Building. The

demolition of the north wing enables the workshop to be move to the south of the car park site to reduce the impact of the building on the Russell and Elliot Jacques buildings.

As an industrial building typology the workshop is a single space wide span large volume (45.4m long x 9.6m high 20.3m wide), open plan research laboratory to accommodate industrial sized pieces of equipment, with a central circulation space allowing for clear spaces for movement and safety around each, as required under Health and Safety requirements. The workshop building has been subject to a number of revisions and has been moved in order to provide a greater separation distance between the new and existing buildings and this current layout is broadly supported. Notwithstanding this point whilst the separation distance between the east facing elevation and the Elliot Jaques has been increased to 15 metres, the west facing elevation is separated from the Russell building by 9.6 metres and extends out to 14.2 metres as the building tunnels towards the south.

Taking into consideration the contrasting designs of the existing and proposed buildings to the east and west and the Gardiner Building to the south and the contrasting materials which are proposed, a greater separation distance would be beneficial. Notwithstanding this point it is accepted the the applicant has revised the scheme which includes the provision of a linear park and academic square around the buildings each to provide an enhanced visual buffer which softens the impact the proposed workshop would have on the character and appearance of the area and the views from outside of the Science Park.

In terms of the scale of the building and how it sits within the context of the adjacent buildings, the proposed elevations illustrate that the workshop building would exceed the height of both the Elliot Jaques and Russell Buildings which are more traditional designed buildings constructed of brick. Whilst the height of the proposed building exceeds that of its neighbours, it is not considered that the height would be unduly visible and/or harmful from local vantage points.

With regards to the specialist laboratory this would form a link between the existing BCAST building and the Gardiner which provides office space which is connected to the operations undertaken within each of the BCAST buildings. As with the Elliot Jaques the Gardiner is a building with a more traditional typology, constructed of brick with a flat roof and windows providing outlook, daylight and sunlight to each of the rooms within the building. It is noted that the entire facades of the Gardiner Building would be rendered to blend in with the proposed laboratory building and further details of the materials including the render would be secured by an appropriately worded condition.

It is noted that the other ancillary buildings such as the substation would be limited in scale and as such are not considered to have a detrimental impact upon the surrounding context.

It is considered that the quality and character of views towards the site would not, in general terms, be significantly adversely affected. Overall, whilst concerns remain about the contrasting building typologies (existing and proposed) and the lack of a greater separation distance between the existing and proposed buildings which would soften the cramped view of the development from outside of the Science Park, it is considered that the benefits of the scheme outweigh the potential harm.

7.08 Impact on neighbours

Policy DMHB 11 (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

There are no residential properties within the immediate vicinity of the proposed

development. It is therefore not considered that the proposal would result in an over dominant form of development, or that there would be a material loss of privacy, daylight or sunlight to surrounding properties which would detract from the amenities of neighbouring occupiers, in compliance with the above mentioned policies and relevant design guidance.

7.09 Living conditions for future occupiers

This consideration relates to the quality of residential accommodation and is not applicable to this type of development.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 6 of the Local Plan: Part Two (2020) sets maximum car parking standards. For a development of this type it is required that the quantum of car parking provided is determined 'on an individual basis using a transport assessment and a travel plan, and in addition provision for taxi and bus/coach access and parking'.

The Healthy Streets approach forms the core theme of the Publication London Plan and Mayor Transport Strategy (2018). Healthy Streets for London (2018) demonstrates the health benefits of more inclusive and healthier street environments which are aimed to encourage active lifestyle.

Policy T2 Healthy Streets' (intended to publish version, 2019) outlines that development proposals should:

- Demonstrate how they will deliver improvements that support the ten Healthy Streets indicators in line with TfL guidance;
- Reduce the dominance of vehicles on London's streets whether stationary or moving; and
- Be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

The main access to the site is on Kingston Lane which forms the eastern boundary of the site. Northwards, Kingston Lane leads to the A4020 and southwards to Hillingdon Hospital and the Brunel University Sports Park.

There is an established network of pedestrian routes formed by footways surrounding and throughout the site which provide good connections to the campus from all surrounding areas.

The main pedestrian walkway through the centre of the campus connects the main eastern access on Kingston Lane with the western access on Cleveland Road; where there is a signal controlled pedestrian crossing providing safe crossing facilities to the Halls of Residence.

There are several additional pedestrian access points surrounding the site ensuring good pedestrian access to the campus from all directions. There is secure parking provision for cycles on site at various locations across the campus, with shelters provided at most locations and it is noted that Cleveland Road is part of the local cycle network as a signed on-road route.

There are a range of Transport for London (TfL) bus services which provide access to the University. These are located on Cleveland Road and Kingston Lane, close to the main site access points.

With regards to car parking the overall campus parking provision is currently operating below the maximum 'cap' of 2088 spaces as agreed within the secured master-plan in 2004 with 1936 on site spaces operational. The proposal for a building to be constructed within the car park would result in the displacement of 53 car parking spaces which are proposed to be located elsewhere within the campus. These areas include the 'Wilfred Brown' Car Park, Eastern Gateway gravel car park and to the rear of 'Elliott Jacques' Building with 18,34 & 1 space re-provided respectively.

TFL have raised within their comments for the parking to be reduced as they see this development as an opportunity to reduce car use. The LPA is of the opinion that developments should not result in the net loss of car parking particularly where the proposed development could result in additional vehicle trips. Given the relatively low number of additional two way vehicle movements which would be resultant of the employment of 15 new FTE staff the LPA's position is that no additional parking should be provided but there should also be no net loss. As such the LPA considers the proposed car parking arrangement to be satisfactory. Any site wide review of parking would be justified during the potential new masterplan review.

A total of 20 cycle spaces have been indicated as being specifically allocated to the proposal. As a maximum of 25 staff would be operating within the building, this quantum of provision exceeds minimum standards and is therefore considered acceptable. TFL state that the cycle parking numbers are inconsistent and the additional spaces could result in a detrimental impact upon the site wide cycle strategy. The councils Highways Engineer has reviewed the proposal and has no concerns with the proposed cycle parking arrangement or its impact upon the wider campus.

With regards to TFL's request for Healthy Streets and Vision Zero improvements to be secured within a legal obligation, both of these considerations were reviewed as part of a recent proposal at the Universities Rugby Pitch approximately 100 metres north of the site. Pedestrian connectivity to and from the main campus and the proposed development will be via the existing footpaths. The footpaths along Kingston Road between the site, main campus and the bus stop are in good condition as is the signalised crossing leading into the the main campus from Kingston Lane.

A number of existing cycle paths exist within the university campus and link to the broader network of Local Cycle Network and National Cycle Route. There is also a public pathway along the southern boundary of the site. To the immediate south of the Proposed Development is Celandine Route, which is a designated off-road shared pedestrian / cycle route, which links to Nursery Lane to the west. The Proposed Development is located approximately 1km to the west of National Cycle Network Routes 6 and 61. Furthermore the entire campus benefits from a number of cycle scheme stations where students and visitors can use a bike from one of the cycle stands at a charge and travel between a number of different locations locally.

In terms of servicing and delivery and access for emergency services, the Councils Highways Engineer raises no concerns with the proposed arrangements.

Taking these points into consideration the Local Planning Authority considers the proposal acceptable and conforms with Policies DMT 2 and DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

7.11 Urban design, access and security

URBAN DESIGN

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

SECURITY

The planning statement does not provide reference to how the proposed development adheres to the principles of secure by design. As such a suitably worded condition is to be attached to any grant of consent requiring the development to accord with the principles of secure by design.

7.12 Disabled access

Policy 7.2 of the London Plan (March 2016) requires that all new development proposals provide the highest standards of accessible and inclusive design.

Publication London Plan Policy D5 relates to inclusive design (December 2020). It notes that the The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.

Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

A) 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;
- 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;
- vii) deliver proposals which incorporate the principles of inclusive design.

The application has been reviewed by the Councils Accessibility Officer who originally raised an objection to the proposal stating that the submission failed to demonstrate adequate provision for the access to the workshop for students with a disability. The use of the building would be restricted to use class E(g) (ii) and any grant of consent would be subject to a legal agreement which includes an obligation to extend to the restriction of the buildings within the Science Park from being used for educational purposes to incorporate the proposed buildings. Upon clarification of the above, the Access Officer has removed his objection and stated that the proposal is considered to be acceptable given the limited number of staff to be employed and that the building would not be used for educational purposes thus there would be no access for students.

7.13 Provision of affordable & special needs housing

Not applicable to this application

7.14 Trees, landscaping and Ecology

TREES AND LANDSCAPING

The NPPF states that development proposals should seek to respect and retain, where possible, existing landforms and natural features of development sites, including trees of amenity value, hedges and other landscape features. It states that development should make suitable provision for high quality hard and soft landscape treatments around buildings.

Policy DMHB 14 of the Local Plan:Part Two (2020) notes all developments will be expected

to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

Publication London Plan Policies G1 and G5 (December 2020) relate to Green Infrastructure and Urban Greening. They confirm that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high- quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. This is to be measured through use of the Urban Greening Factor.

The landscape design surrounding the AMCC 3 building focuses on creating a series of high quality urban spaces with a ribbon of green wrapping through the buildings. The landscape creates a destination within the university while creating key links to the wider masterplan. The design consists of four main character areas, these are;

- (1) The Boulevard.
- (2) The Wildlife garden.
- (3) The Academic Square.
- (4) Green streets.

Green walls are proposed to the main building, Infill Specialist Laboratory building and the rebuilt section of the Gardiner Building. In addition, a sedum roof is proposed to the Infill Specialist Laboratory.

The proposed development achieves an Urban Greening Factor score of 0.32, which exceeds policy requirements contained in the Publication London Plan (December 2020) which is a score of 0.3 for commercial developments. It is noted the GLA state this should be improved however Policy G5 states that commercial developments not including B2 and or B8 uses should provide a rating of 0.3. The development would formally have been considered a B2 use (light industrial) which now forms part of the E use class and therefore does not need to adhere to the ratings within the policy. As such the proposal provides well in excess of what is required for this type of building.

The Landscaping Statement contains analysis of sun and shading for the proposed green spaces. The studies show that the site has good levels of light throughout the whole day in both the summer and winter months. The central courtyard will receive large amounts of sun throughout the day. The boulevard between the proposed AMCC building and Russell will receive good light mid morning through to early evening.

Overall, the proposals are considered to deliver improvements to the landscaping and green space within the Science Park, improving an area that is currently dominated by hard surfacing and car parking.

The main site is part of a car park with associated soft landscaping which includes some relatively young trees and an area of established landscape to the north and west of The Russell Building. Most of these trees have become well established and will be and will be largely unaffected by the construction process, if they are adequately protected during the project. Trees currently located within the car park have established less well and these trees will be removed to enable the proposed building. Elsewhere three relatively poor-quality Birch trees will be removed to enable the proposed access to the revised parking along the east side of the site.

Opportunities to plant new trees within the site are relatively limited, although the wider university campus has a thriving extensive tree population of broad species and age diversity. Some trees will be removed from a closely planted group of trees around the northern end of The Russell Building. Whilst several are B category trees are to be removed to enable the proposed development, the bulk are C category trees, presumably planted as part of the landscape scheme for the development of The Russell Building. Planted closely together a number of these trees are now in poor condition and declining.

The redevelopment of this part of the campus provides the impetus to plant new trees, expanding both the age range and species diversity which will help reduce the vulnerability of the currently limited species palette to pest and disease.

The arboricultural report does not provide adequate information relating to tree protection measures and it is important that measures are put in place pre and during the construction phase. As such an appropriately worded condition shall be attached to any grant of consent pertaining to the submission of a tree protection plan.

Taking the above into consideration the proposed development would accord with the relevant local and regional policies which are referred to above.

ECOLOGY

Immediately to the north of the site is a designated Nature Conservation Site of Metropolitan or Borough Grade I Importance. The following planning policies are taken into consideration:

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy 7.19 of the London Plan (March 2016) states that development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy EM3 of the Local Plan: Part 1 - Strategic Policies (November 2012) advises that for development adjacent to rivers, the Local Planning Authority will seek to secure and where possible enhance the role of the river and its immediate surroundings as a wildlife corridor.

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

An ecology report has been submitted in support of the proposals. This confirms that there would be no negative impacts on existing ecology. The report makes recommendations to incorporate bird and bat boxes, to enhance habitats at the site. It also notes the benefits of the proposed landscaping. The report concludes that with the proposed enhancements, the proposals would lead to a beneficial impact on ecology. The location of the bird and bat boxes shall is not indicated on the site or landscaping plans therefore this shall be secured within a landscaping condition.

7.15 Sustainable waste management

Policy 5.17 of the London Plan (March 2016) sets out the Mayors Spatial Policy for Waste Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling.

Refuse from the building will be collected by the existing refuse lorries serving the site. Two new waste stores are proposed to be constructed on the edge of site boundary in front of the Russell Building. Refuse arrangements will be dealt with as part of the wider campus arrangements and secured by way of condition. This involves the transfer of any waste to a central collection point, which is already established.

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (2016) and SI 2 (Publication London Plan December 2020) requires developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

Be lean: use less energy
Be clean: supply energy efficiently
Be green: use renewable energy

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (2016).

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

In relation to the energy credentials of the proposed building, details are set out within the Energy Strategy. The document concludes as follows.

- (1) Reductions in emissions for the new development have been demonstrated via demand reduction and green energy generation, in line with the energy hierarchy specified by the London Plans.
- (2) The scheme seeks to optimise fabric performance, natural light and predominantly utilises natural ventilation to reduce mechanical system loads.
- (3) The design incorporates efficient systems and low carbon air source heat pumps (ASHPs). This is supplemented by renewable energy generation from 158m² of solar photovoltaic (PV) panels.
- (4) In total, for SAP 12 these measures contribute an overall estimated carbon saving of 50% over the notional building in terms of regulated energy, providing an estimated carbon saving of 18.6 tonnes of CO₂ per year.

The GLA comments state that the energy strategy is generally policy compliant, however, the applicant is required to submit additional information related to overheating and cooling,

maximising PV, futureproofing for district heating network, heat pumps, and Whole lifecycle carbon assessment. Notwithstanding this comment a review of the supporting documents identifies information to satisfy these points as shown below.

Section 8.0 of the energy statement provides information pertaining to overheating, demonstrating that the approach to design has prioritised interventions in accordance with the cooling hierarchy, with the research lab space demonstrating compliance with CIBSE TM52 via natural ventilation. The cooling strategy described in section 3.1.6, 3.1.7 and 3.1.8 which states that the building has been designed with minimal glazing to limit solar gains, air source heat pumps will be used to cool the ancillary spaces and a wind catcher design will provide natural cooling to the workshop space.

Section 3.3.1 provides detail of the roof mounted solar PV array, which has been maximised (other areas of the roof are needed for other functions). Furthermore Section 3.2 describes the future DH connection potential and strategy which states that the design includes distribution boards with integral energy meters. These will have the capability to connect to future energy management systems. Building users can identify the energy consuming end uses, for example through labelling or data outputs, utilising the digital readout on the distribution boards.

As no further information has been provided by the GLA which would indicate if further information is required to satisfy the energy policies no further information has been requested from the applicant. Moreover the Councils Energy and Sustainability Officer has assessed the submission and raised no objection subject to a condition pertaining to further details relating to living walls, green roofs and green walls. As such the proposal is considered to be acceptable.

7.17 Flooding or Drainage Issues

Policy 5.13 of the London Plan (2016) states that development proposals should use sustainable urban drainage systems (SuDs) unless there are good reasons for not doing so and that developments should aim to achieve green-field run-off rates. Policy 5.15 goes on to confirm that developments should also minimise the use of mains water by incorporating water saving measures and equipment.

Policy DMEI 10 of the Local Plan: Part Two (2020) applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

A Flood Risk Assessment has been submitted by the applicant which states that the site is located within Flood Zone 1. As such the site is identified as being at very low risk of surface water or fluvial flooding.

A green roof is proposed and supported for the infill specialist laboratory but not the larger research building. In addition two small rain gardens are included. Permeable paving as well as tanks are provided to restrict run off from this area up to and including the 1 in 100 year plus 40% climate change event.

The stage 1 GLA response states that further details on attenuation storage volume values and calculation methods should be provided. The Flood Risk Assessment (Doc. No. 26676-BDP-XX-XX-RP-C-0002) includes preliminary calculations for surface water attenuation volumes. Detailed calculations will be developed in the next design stages and a condition to ensure these details are submitted and approved in writing by the Local

Planning Authority will be attached to any grant of planning consent.

Subject to further information to be secured by condition the application is considered acceptable.

7.18 Noise or Air Quality Issues

NOISE

Policy 7.15 of the London Plan (March 2016) states that development proposals should seek to manage noise by:

- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- b. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;
- c. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- d. separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout - in preference to sole reliance on sound insulation;
- e. where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
- f. having particular regard to the impact of aviation noise on noise sensitive development;
- g. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

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

The applicant has submitted a noise assessment which includes an environmental noise and breakout noise assessment. The documents has been reviewed by the Councils Noise consultant who advises that whilst the document is broadly acceptable a further detailed assessment should be undertaken to confirm the scheme to control machinery and plant noise emanating from the site is in accordance with BS 4142. Subject to the imposition of conditions, this application is considered to accord with policies EM8 of the Local Plan Part 1 (2012) and DMHB 11 of the Local Plan Part Two(2020).

AIR QUALITY

Policy DME1 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Sustainability Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to Air Quality enhancements.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Developments are expected to be:

- Air quality neutral;
- include mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors; and
- actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

The application site falls within an Air Quality Focus Area and given the scale of the development the applicant is required to submit an Air Quality Assessment demonstrating that the development would be air quality neutral.

The traffic associated with the proposed development will affect the Uxbridge Air Quality Focus Area, originating traffic emissions which will add to current exceedances. As per the new Publication London Plan (2020), developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

The AQA focuses solely on the proposed impact of the buildings upon the focus area. The trip generation rates for the new development are 10-15 new two-way vehicle movements between the 15 FTE additional staff. The additional trip generation is very low. Given that there is no increase in car parking proposed and the scheme includes urban greening elements which would benefit air quality the proposal is considered to comply with the above policies.

The supporting document has been assessed by the Council's Air Quality Officer who has raised no objection to the proposal subject to conditions pertaining to reducing emissions during construction and the use of low energy use vehicles. In addition it has been agreed that the university should extend its existing travel plan to incorporate this new development which demonstrates the commitment to shifting to more sustainable transport modes and reducing the impacts of air quality. This is to be secured by way of a s106 obligation.

Taking the above into consideration the proposed development is considered to comply with the relevant air quality policies.

7.19 Comments on Public Consultations

See external comments section of this report

7.20 Planning obligations

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and

iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

At a regional level, policy 8.2 'Planning Obligations' of the London Plan (March 2016) stipulates that when considering planning applications of strategic importance, the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. It also states that development proposals should address strategic as well as local priorities in planning obligations.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

The obligations sought are as follows:

A). Secure the restriction of use of the building to:

- (i) scientific research associated with or ancillary to industrial production or manufacture
- (ii) light industrial production or manufacture of a nature which is dependent upon or gives rise to regular consultation with either or both of the following:
 - the research development and/or design staff of the occupier or any company with which the occupier is associated or any company forming part of a group of companies of which the occupier is part
 - the scientific staff or facilities of Brunel University or of other scientific institutions or bod

B). Travel Plan. The applicant shall amend the universities existing site wide travel plan to incorporate the additional trips associated to the proposed development and it's community use.

C) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances.

The proposal is not liable for the London Borough of Hillingdon CIL and the Mayor of London's CIL, as although the scheme provides more than 100 sq.m of floorspace in accordance with paragraph 52 of the CIL regulations temporary planning permissions are exempt from CIL liability.

7.21 Expediency of enforcement action

None

7.22 Other Issues

CONTAMINATED LAND

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The site is currently in use as a car park and therefore appropriate site and laboratory testing has been undertaken to identify any contamination risks. All test results were returned within acceptable limits, and therefore the risk to human health is considered to be low.

The site is located within an area of less than 1% radon potential and as such no precautionary measures are required. Ground gas monitoring has been carried out as part of the site investigations, with appraisal of the results concluding that no special protection measures are required. Notwithstanding this point the application has been reviewed by the Councils Contaminated Land Officer who has suggested attaching two conditions and an informative relating to imported materials and the discovery of contaminated material on site whilst construction is carried out.

FIRE SAFETY

In accordance with Policy D12 'Fire safety' of the Publication London Plan (December 2020) , all major development proposals should be submitted with a Fire Safety Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The policy states :

A. 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 and ensure that they:

1. are designed to incorporate appropriate features which reduce the risk to life in the event of a fire
2. are constructed in an appropriate way to minimise the risk of fire spread
3. provide suitable and convenient means of escape for all building users
4. adopt a robust strategy for evacuation which all building users can have confidence in
5. provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B. All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

1. the building's construction: methods, products and materials used
2. the means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated management plan approach
3. access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
4. how provision will be made within the site to enable fire appliances to gain access to the

building.

The application is supported by a Fire Safety Strategy which has been provided by a suitable fire safety assessor. The strategy has been reviewed by the Councils Building Control Team who have stated that the document provided is sufficient however it does state that amendments will be required throughout the final design process. As such a suitably worded condition has been included to ensure that a comprehensive and final Fire Safety Strategy is submitted and approved by the Local Planning Authority in consultation with Building Regulations.

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

Very special circumstances for the development, which include substantial employment, inward investment and sustainability benefits of the proposal, have been established to justify why normal Green Belt policy should not apply in this case. In addition, the general principle of the development is considered acceptable, as the proposal is required in connection with scientific research and light industrial production or manufacture, which is dependent research or development, similar to research and development facilities established on the Science Park. The principle of the development is therefore considered acceptable at this location.

In terms of the impact on the Green Belt, the proposed changes to the landform are minimal. While some trees will be removed to accommodate the proposal, new tree planting is proposed and it is considered that the visual impacts of the proposal will not be of significant detriment to the character and openness of this part of the Green Belt.

Whilst the proposed new buildings would result in some visual harm in terms of its relationship with the neighbouring buildings given its contrasting materials which are more industrial and the lack of a greater separation distance between the new and existing buildings, the benefits of the scheme are considered to outweigh the harm.

In addition there are no flood risk issues associated with this development subject to conditions.

The BCAST 3 development would result in the displacement of 53 parking spaces which are proposed to be sited in appropriate locations within the wider campus. In order to ensure that the university remains committed to reducing car use and shift towards more sustainable modes of transport, an obligation has been included within the heads of terms for a legal agreement to ensure that the existing travel plan is extended to incorporate the BCAST 3.

In addition an obligation to restrict the buildings use to research only has also been included in order to prevent the changing of the use of the building to a use which could have a greater impact upon material planning considerations such as educational use.

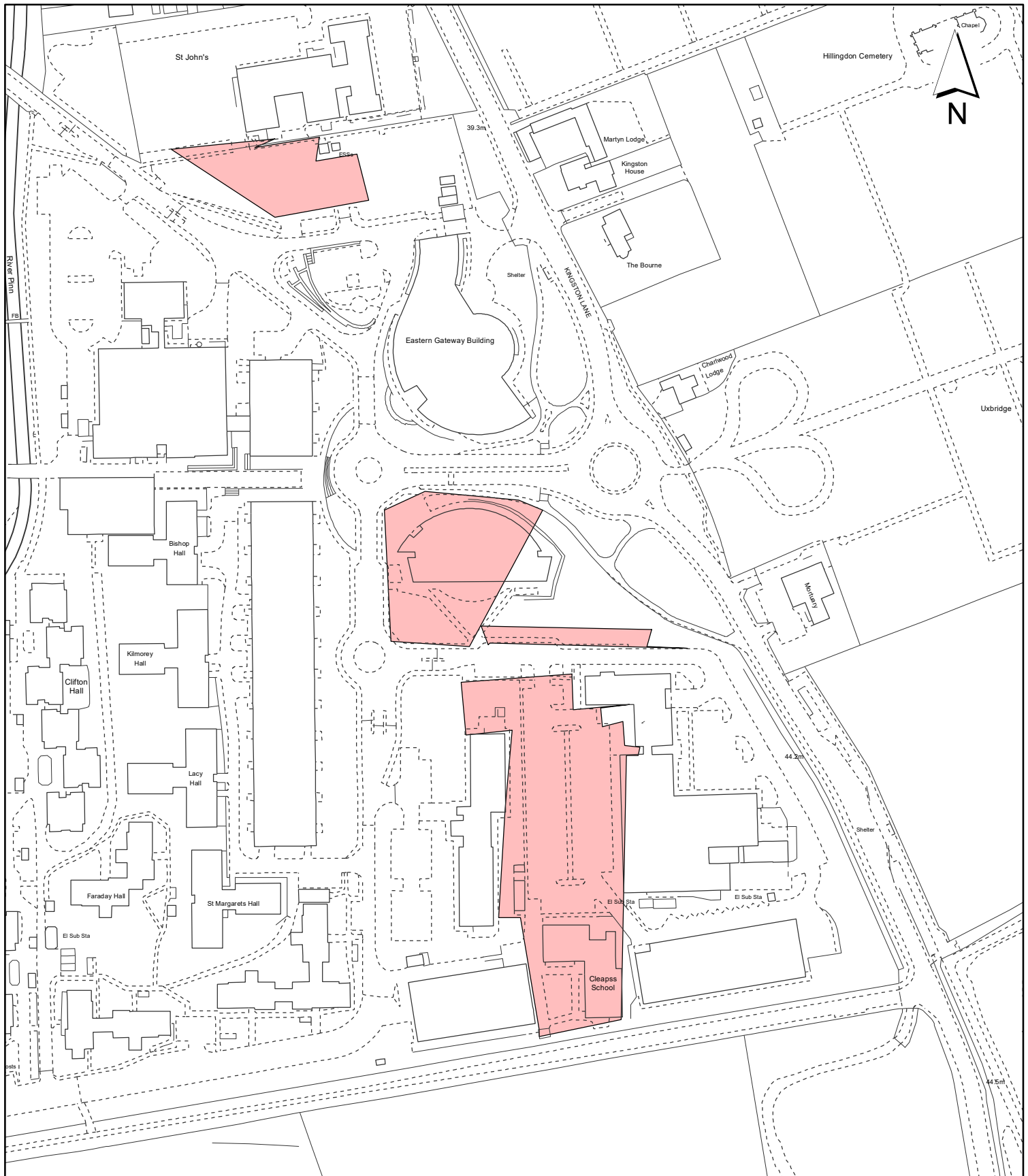
Approval is therefore recommended subject to a S106 agreement and conditions.

11. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
Hillingdon Local Plan: Part Two Policies Map (2020)
The London Plan (2016)
National Planning Policy Framework (2019)
Publication London Plan (2020)
Supplementary Planning Document 'Accessible Hillingdon', adopted September (2017)

Contact Officer: Christopher Brady

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Notes:

 Site boundary

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Site Address:

Brunel Uni BCAST 3

Planning Application Ref:
532/APP/2020/3198

Planning Committee:
Major

Scale:
1:2,000

Date:
January 2021

LONDON BOROUGH OF HILLINGDON
Residents Services
Planning Section

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