

Report of the Interim Director of Planning, Regeneration & Public Realm

Address	LAND EAST OF MONS BARRACK ST ANDREWS PARK HILLINGDON ROAD UXBRIDGE
Development:	Reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19 (Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works).
LBH Ref Nos:	585/APP/2022/665
Drawing Nos:	LEO-BDP-ZZ-00-DR-A-PL-1210 Rev P09 LEO-BDP-ZZ-00-DR-A-PL-1211 Rev P13 LEO-BDP-ZZ-ZZ-DR-A-PL-1415 Rev P03 LEO-BDP-ZZ-00-DR-A-PL-1220 Rev P01 Proposed Plan Level LC Indicative Location of Additional Accessible Parking Bays LEO-BDP-ZZ-02-DR-A-PL-1213 Rev P07 LEO-BDP-ZZ-01-DR-A-PL-1212 Rev P07 LEO-BDP-ZZ-ZZ-DR-A-PL-1417 Rev P03 LEO-BDP-ZZ-ZZ-DR-A-PL-1418 Rev P02 26th April 2022 CO2 Emissions Calculations AF2674 Issue 01 3rd March 2022 Fire Statement Report September 2022 Planning Statement Addendum 24th November 2022 LEOMB Internal Daylight Sunlight Addendum Report 5105977 03/03/22 Transport Addendum Note Covering Letter dated 4th March 2022 LEO-BDP-ZZ-ZZ-DR-A-PL-1416 Rev P04 LEO-BDP-ZZ-ZZ-DR-A-PL-1414 Rev P04 March 2022 Rev 01 Reserved Matters Planning Statement 3002349-BDP-ZZ-XX-RP-A-0001-06 Rev 01 LEO-BDP-ZZ-03-DR-A-PL-1214 Rev P07 LEO-BDP-ZZ-ZZ-DR-A-PL-1412 Rev P03 LEO-BDP-ZZ-ELE-DR-A-PL-1271 Rev P02 LEO-BDP-ZZ-ELE-DR-A-PL-1272 Rev P02 LEO-BDP-ZZ-ELE-DR-A-PL-1273 Rev P02 LEO-BDP-ZZ-ELE-DR-A-PL-1170 Rev P06 LEO-BDP-ZZ-ELE-DR-A-PL-1171 Rev P07 LEO-BDP-ZZ-ELE-DR-A-PL-1270 Rev P04 LEO-BDP-ZZ-ELE-DR-A-PL-1274 Rev P04 LEO-BDP-ZZ-ELE-DR-A-PL-1275 Rev P04 400101-BDP-16-00-DR-A-2011 Rev B 2683-TS-02 Rev P2 LEO-BDP-ZZ-05-DR-A-PL-1216 Rev P06 LEO-BDP-ZZ-RL-DR-A-PL-1004 Rev P04 LEO-BDP-ZZ-RL-DR-A-PL-1001 Rev P03 2683-LA-03 Rev P7 LEO-BDP-ZZ-RL-DR-A-PL-1002 Rev P03 LEO-BDP-ZZ-ELE-DR-A-PL-1370 Rev P02

LEO-BDP-ZZ-ELE-DR-A-PL-1371 Rev P02
 LEO-BDP-ZZ-ELE-DR-A-PL-1372 Rev P02
 LEO-BDP-ZZ-ELE-DR-A-PL-1373 Rev P03
 LEO-BDP-ZZ-ZZ-DR-A-PL-1374 Rev P02
 LEO-BDP-ZZ-ZZ-DR-A-PL-1375 Rev P02
 LEO-BDP-ZZ-ZZ-DR-A-PL-1376 Rev P02
 LEO-BDP-ZZ-ZZ-DR-A-PL-1411 Rev P03
 LEO-BDP-ZZ-ZZ-DR-A-PL-1413 Rev P02
 LEO-BDP-ZZ-ZZ-DR-A-PL-1419 Rev P01
 LEO-BDP-ZZ-RL-DR-A-PL-1003 Rev P03
 LEO-BDP-ZZ-04-DR-A-PL-1215 Rev P08
 LEO-BDP-ZZ-ZZ-DR-A-PL-1410 Rev P03

Date Plans Received:	07/03/2022	Date(s) of Amendment(s):	06/10/2022
Date Application Valid:	07/03/2022		16/06/2022
			19/12/2022
			30/01/2023
			07/03/2022
			21/09/2022
			03/07/2022

1. SUMMARY

This application is for reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19. The outline application granted consent for means of site access from the central access road, now known as Burton Road, within St Andrews and for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works. Internal access, layout, scale, appearance and landscaping were reserved for subsequent approval, for which this application seeks consent.

The scale and massing are in accordance with the outline consent and the design of the proposals is considered to be appropriate. The application proposes 90 dwellings, including 28 no. 1 bedroom units (31%), 48 no. 2 bedroom units (53%) and 14 no. 3 bedroom units (16%). The proposed mix represents a minor conflict with Policy DMH 2 at 16% family units. However, on balance, the scheme is delivering 35% affordable housing that would be policy and tenure compliant. If the quantum of family units were higher, the scheme would be unable to deliver the same level of affordable housing.

The application site is also now within Uxbridge Town Centre as designated by the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). This is an area where a higher proportion of one and two bedroom units are considered to be acceptable as set out by Policy H10 of the London Plan (2021). The proposed development would provide 14 x 3 bedroom dwellings, which is an increase on the 12no. originally proposed at outline stage. The Council's Policy Team Manager raises no objection to the housing mix proposed.

The Reserved Matters application is in accordance with the outline consent reference 585/APP/2017/2819 and is deemed to essentially accord with relevant local and national

policies while delivering a substantial number of new dwellings.

As such the application is recommended for approval.

2. RECOMMENDATION

APPROVAL subject to the following:

1 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:

LEO-BDP-ZZ-RL-DR-A-PL-1001 Rev P03 Site Location Plan

LEO-BDP-ZZ-RL-DR-A-PL-1004 Rev P04 Proposed Site Block Plan

LEO-BDP-ZZ-00-DR-A-PL-1210 Rev P09 Proposed Plan - Level LG

LEO-BDP-ZZ-00-DR-A-PL-1211 Rev P13 Proposed Plan - Level 00

LEO-BDP-ZZ-01-DR-A-PL-1212 Rev P07 Proposed Plan - Level 01

LEO-BDP-ZZ-02-DR-A-PL-1213 Rev P07 Proposed Plan - Level 02

LEO-BDP-ZZ-03-DR-A-PL-1214 Rev P07 Proposed Plan - Level 03

LEO-BDP-ZZ-04-DR-A-PL-1215 Rev P08 Proposed Plan - Level 04

LEO-BDP-ZZ-05-DR-A-PL-1216 Rev P06 Proposed Plan - Level RF

LEO-BDP-ZZ-ELE-DR-A-PL-1271 Rev P02 Proposed Elevations - North East & South East (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1272 Rev P02 Proposed Elevations - South & West (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1273 Rev P02 Proposed Elevation - South West (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1170 Rev P06 Proposed Context Elevations North & East

LEO-BDP-ZZ-ELE-DR-A-PL-1171 Rev P07 Proposed Context Elevations South & West

LEO-BDP-ZZ-ELE-DR-A-PL-1270 Rev P04 Proposed Elevation - North (Block A)

LEO-BDP-ZZ-ELE-DR-A-PL-1274 Rev P04 Proposed Elevations - North & East (Block B)

LEO-BDP-ZZ-ELE-DR-A-PL-1275 Rev P04 Proposed Elevations - South & West (Block B)

LEO-BDP-ZZ-ZZ-DR-A-PL-1410 Rev P03 Apartment Types (1 Bedroom) Sheet 1 of 2

LEO-BDP-ZZ-ZZ-DR-A-PL-1411 Rev P03 Apartment Types (1 Bedroom) Sheet 2 of 2

LEO-BDP-ZZ-ZZ-DR-A-PL-1412 Rev P03 Apartment Types (2 Bedrooms) Sheet 1 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1413 Rev P02 Apartment Types (2 Bedrooms) Sheet 2 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1414 Rev P04 Apartment Types (2 Bedrooms) Sheet 3 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1415 Rev P03 Apartment Types (3 Bedrooms) Sheet 1 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1416 Rev P04 Apartment Types (3 Bedrooms) Sheet 2 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1417 Rev P03 Apartment Types (3 Bedrooms) Sheet 3 of 3

LEO-BDP-ZZ-ZZ-DR-A-PL-1418 Rev P02 Part M4(3) Unit

LEO-BDP-ZZ-ZZ-DR-A-PL-1419 Rev P01 Apartment Types (Duplex Units)

LEO-BDP-ZZ-ELE-DR-A-PL-1370 Rev P02 Bay Study 01

LEO-BDP-ZZ-ELE-DR-A-PL-1371 Rev P02 Bay Study 02

LEO-BDP-ZZ-ELE-DR-A-PL-1372 Rev P02 Bay Study 03

LEO-BDP-ZZ-ELE-DR-A-PL-1373 Rev P03 Car Park entrance Study

LEO-BDP-ZZ-ZZ-DR-A-PL-1374 Rev P02 Core 1 Entrance Study

LEO-BDP-ZZ-ZZ-DR-A-PL-1375 Rev P02 Core 2 Entrance Study

LEO-BDP-ZZ-ZZ-DR-A-PL-1376 Rev P02 Core 3 Entrance Study

LEO-BDP-ZZ-00-DR-A-PL-1220 Rev P01 Proposed Plan Level LG Indicative Location of Additional Accessible Parking Bays

2683-LA-03 Rev P7 Landscape Masterplan

400101-BDP-16-00-DR-A-2011 Rev B Parameter Plan - Landscape

2683-TS-02 Rev P2 Tree Removal/Retention Plan; and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

2 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:

Design and Access Statement - Reserved Matters 3002349-BDP-ZZ-XX-RP-A-0001-08 Rev 08

Fire Statement Report AF2674 Issue 01 3rd March 2022

Reserved Matters Planning Statement March 2022 Rev 01

CO2 Emissions Calculations 26th April 2022

Planning Statement Addendum September 2022

Transport Addendum Note 5105977 03/03/22

LEOMB Internal Daylight Sunlight Addendum Report 24th November 2022

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 (2021).

3 NONSC Photovoltaics

Prior to above ground works, full details including specifications of the Photovoltaics required to deliver the CO2 reductions as set out in the Energy Statement Addendum dated April 2018 shall be submitted to the Local Planning Authority for approval in writing. The details shall include the type and size of PVs, as well as elevations and a roof plan showing their incorporation on the roof space and the method for fixing them to the roof. The details shall also include the methods for monitoring the use of the PVs and the collection and use of any 'feed in tariffs'. The development must proceed in accordance with the approved plans.

REASON

To ensure the development achieves CO2 reductions in accordance with Policy SI 2 of the London Plan (2021), Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies DMEI 1, DMEI 2 and DMEI 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

4 RES13 Obscure Glazing

The window(s) facing west towards the building known as the 'Mons Block' shall be glazed with permanently obscured glass to at least scale 4 on the Pilkington scale and be non-opening below a height of 1.8 metres taken from internal finished floor level for so long as the development remains in existence.

REASON

To prevent overlooking to adjoining properties in accordance with policies DMHB 11 and DMHD 1-2 of the Hillingdon Local Plan Part 2 (2020).

INFORMATIVES

1

The applicant is advised that the details submitted to discharge Condition 7 (Landscaping)

of the outline consent should include details of the 5 trees proposed to replace the two trees hereby consented to be removed. The submission should also include details of the secure hedging and railing proposed for the ground floor and podium levels.

2 I52 Compulsory Informative (1)

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

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.

DMAV 1	Safe Operation of Airports
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development

LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking

4 I70 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 I73 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

3. CONSIDERATIONS

3.1 Site and Locality

The application site forms part of St Andrews Park (the former RAF Uxbridge Site). The site is an area of land located in the western part of the wider site to the east of the Mons Barrack Block which is locally listed. The site is bounded by Hillingdon Road to the west, Burton Road and Phase 3C to the south, Churchill Road and Phase 4 to the east and the remaining sections of the future Town Centre Extension to the north. The Southern boundary of the site is occupied by a line of mature horse chestnut trees, the majority of which are to be retained, forming an important strategic landscape green link.

3.2 Proposed Scheme

Planning consent reference 585/APP/2017/2819 dated 14-03-19 granted permission for 'Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.'

This application relates to the reserved matters submission following that grant of consent. The principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access and movement and tree retention and removal. Therefore, the emerging proposals are in relation to internal layout, scale, appearance, access (internal only) and landscaping in accordance with the requirements of Condition 2 of planning permission ref: 585/APP/2017/2819.

In summary, the key features of the proposed development are:

- 90 residential dwellings comprising a mix of:

- 1 x 1 bed 1 person
- 27 x 1 bed 2 person
- 17 x 2 bed 3 person
- 31 x 2 bed 4 person
- 2 x 3 bed 4 person
- 9 x 3 bed 5 person
- 3 x 3 bed 6 person

This equates to 28 no. 1 bedroom units (31%), 48 no. 2 bedroom units (53%) and 14 no. 3 bedroom units (16%).

Unit Type 2A is included in the above as 2 bed 3 person units, however they have been designed so that they can be delivered without structural alteration as a 2 bed 4 person M4(2) unit or a 2 bed 3 person M4(3) Wheelchair User Home. 9 of the 13no. proposed Type

2A units are proposed to be delivered as Part M4(3) Wheelchair User Homes in accordance with Condition 11 of the outline consent. The location of the part M4(3) units is required to be confirmed prior to occupation in accordance with Condition 11.

- Affordable provision of 35% by habitable room
- 10% wheelchair accessible units in accordance with Part M4(3) and the remaining 90% in accordance with Part M4(2).
- 63 car parking spaces (ratio of 0.7 spaces per unit), including 7 accessible spaces (10%) for wheelchair users
- 90 long stay cycle spaces for residents (including 10 spaces for larger cycles)
- 5 motorcycle parking spaces
- Private and communal amenity space
- Soft and hard landscaping

The development consists of 2 blocks of up to 6 storeys set around a podium level communal amenity space for residents. This would supplement the private amenity provision offered by balconies and terraces for each individual unit.

The slope across the site means that at the west of the site this podium area would be level with the surrounding roads, while at the eastern end it is a storey above the adjacent roads. This enables the development of a proposed lower ground level incorporating apartments along the eastern facade and access to basement car and cycle parking beneath the podium level.

A substantial portion of the site along its southern edge is given over to informal open space enabling the retention of a row of significant trees and creating a strong green link across the masterplan area from West to East connecting to St Andrew's Park.

An external substation is also proposed as it has been identified that there is no connection to an electrical substation for the site. As such, the proposals have incorporated a substation that has been located externally to the building so that it is able to serve future buildings and developments in the surrounding area if required. The proposed substation is proposed to be located within the public realm in the south-eastern corner of the site and the landscaping proposals include screening of this by evergreen planting.

3.3 Relevant Planning History

585/APP/2009/2752

R A F Uxbridge Hillingdon Road Uxbridge

1. Outline application (all matters reserved, except for access) including demolition of some existing buildings and:
 - a) Creation of up to 1,296 residential dwellings (Class C3) of between 2 to 6 residential storeys;
 - b) Creation of up to 77 one-bedroom assisted living retirement accommodation of between 3 to 4 storeys;
 - c) Creation of a three-form entry primary school of 2 storeys;
 - d) Creation of a hotel (Class C1) of 5 storeys of up to 90 beds;
 - e) Creation of a 1,200 seat theatre with ancillary cafe (Sui Generis); office (Class B1a) of up to 13,860sq.m; energy centre (Sui Generis) of up to 1,200sq.m; and retail (Class A1, A2, A3, A4, A5) of up to 2,850sq m; in buildings of between 4 to 6 storeys as well as a tower element associated with the theatre of up to 30m;
 - f) Creation of a local centre to provide up to 150sq.m of retail (Class A1 and A2) and 225sq.m GP surgery (Class D1); Means of access and improvements to pedestrian linkages to the Uxbridge Town centre; car parking; provision of public open space including a district park; landscaping; sustainable infrastructure and servicing.

2. In addition to the above, full planning permission for:

- a) Creation of 28 residential dwellings (Class C3) to the north of Hillingdon House of between 2 to 3 storeys as well as associated amenity space and car parking;
- b) Change of use of Lawrence House (Building No. 109) to provide 4 dwellings (Class C3), associated amenity space and car parking including a separate freestanding garage;
- c) Change of use and alterations to the Carpenters building to provide 1 residential dwelling (Class C3);
- d) Change of use and alterations to the Sick Quarters (Building No. 91) to provide 4 dwellings (Class C3) as well as associated amenity space and car parking;
- e) Change of use of Mons barrack block (Building No. 146A) to provide 7 dwellings (Class C3) as well as associated amenity space and car parking.
- f) Change of use of the Grade II listed former cinema building to provide 600sq.m Class D1/2 use (no building works proposed);
- g) Change of use and alterations to the Grade II listed Hillingdon House to provide 600sq.m for a restaurant (Class A3) on the ground floor and 1,500sq.m of office (Class B1) on the ground, first and second floors;

Decision: 18-01-2012 Approved

585/APP/2015/848 St Andrews Park Hillingdon Road Uxbridge

Variation of condition 5 of planning permission ref: 585/APP/2009/2752 dated 18/01/2012 (redevelopment of former RAF Uxbridge site) to amend approved plans and drainage strategy regarding the Town Centre Extension phase of the development.

Decision: 21-12-2015 Approved

585/APP/2016/4442 St Andrew'S Park Hillingdon Road Uxbridge

Reserved matters (layout, scale, appearance and landscaping) for the erection of 101 dwellings together with associated parking and landscaping within the Town Centre Extension (East/Dice) Phase of planning permission ref. 585/APP/2015/848 dated 21-12-2015.

Decision: 10-01-2018 Approved

585/APP/2016/4504 St Andrew'S Park Hillingdon Road Uxbridge

Reserved matters (layout, scale, appearance and landscaping) for the erection of 294 dwellings and up to 469 sq.m of retail floorspace (use classes F.2, E and Public House/Takeaway (Sui Generis), formerly A1-5) development together with associated parking and landscaping within the Town Centre Extension (West) Phase of planning permission ref. 585/APP/2015/848 dated 21-12-2015.

Decision: 30-11-2021 Approved

585/APP/2017/2819 Land East Of Mons Barrack Block, St Andrew'S Park Hillingdon Road

Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.

Decision: 01-08-2018 Approved

585/APP/2019/829 Land Off Thompson Rd & St Luke'S Rd, Former Raf Uxbridge Hillingdon
Erection of a building containing 72 assisted living apartments and communal facilities (Use Class C2) with associated parking and landscaping.

Decision: 21-08-2019 Approved

585/APP/2022/149 St Andrews Park Hillingdon Road Uxbridge
Details pursuant to the partial discharge of Conditions 62 (Tree Protection) and 66 (Method Statement) for the Town Centre West Phase of planning permission reference 585/APP/2015/84 approved 21-12-15 (Variation of condition 5 of planning permission ref: 585/APP/2009/2752 date 18/01/2012 (redevelopment of former RAF Uxbridge site) to amend approved plans and drainage strategy regarding the Town Centre Extension phase of the development).

Decision: 14-10-2022 Withdrawn

Comment on Relevant Planning History

The application site sits within the former RAF Uxbridge site, now known as St Andrews Park. Planning permission was approved on 18th January 2012 under application reference 585/APP/2009/2752 for the following across the wider site:

1. Outline application (all matters reserved, except for access) including demolition of some existing buildings and:
 - a. Creation of up to 1,296 residential dwellings (Class C3) of between 2 to 6 residential storeys;
 - b. Creation of up to 77 one-bedroom assisted living retirement accommodation of between 3 to 4 storeys;
 - c. Creation of a three-form entry primary school of 2 storeys;
 - d. Creation of a hotel (Class C1) of 5 storeys of up to 90 beds;
 - e. Creation of a 1,200 seat theatre with ancillary cafe (Sui Generis); office (Class B1a) of up to 13,860 sq m; in buildings of between 4 to 6 storeys as well as a tower element associated with the theatre of up to 30m;
 - f. Creation of a local centre to provide up to 150 sq m of retail (Class A1 and A2) and 225 sq m GP surgery (Class D1); means of access and improvements to pedestrian linkages to the Uxbridge Town Centre; car parking; provision of public open space including a district park; landscaping; sustainable infrastructure and servicing.
2. In addition to the above, full planning permission for:
 - a. Creation of 28 residential dwellings (Class C3) to the north of Hillingdon House of between 2 to 3 storeys as well as associated amenity space and car parking;
 - b. Change of use of Lawrence House (Building no. 109) to provide 4 dwellings (Class C3), associated amenity space and car parking including a separate freestanding garage;
 - c. Change of use and alterations to the Carpenters building to provide 1 residential dwelling (Class C3);
 - d. Change of use and alterations to the Sick Quarters (Building No. 91) to provide 4 dwellings (Class C3) as well as associated amenity space and car parking;

- e. Change of use of Mons barrack block (Building No. 146A) to provide 7 dwellings (Class C3) as well as associated amenity space and car parking;
- f. Change of use of the Grade II listed former cinema building to provide 600sqm Class D1/2 use (no building works proposed);
- g. Change of use and alterations to the Grade II listed Hillingdon House to provide 600 sq m for a restaurant (Class A3) on the ground floor and 1,500 sq m of office (Class B1) on the ground, first and second floors.

Of particular significance to the current application is element 2 (e) of this consent 'Change of use of Mons barrack block (Building No. 146A) to provide 7 dwellings (Class C3) as well as associated amenity space and car parking'. The Mons Block sits at the western end of the application site.

An application for a non-material amendment to vary the Phasing Plan was approved in January 2015 (Application Ref. 585/APP/2014/4023). An application to amend the approved parameter plans for the outline consent was approved under planning permission reference 585/APP/2015/848 dated 21-12-15. This permission supersedes the original outline permission reference 585/APP/2009/2752.

Various applications for Reserved Matters relating to Phases 1, 2, 3, 4, 6, The Dice buildings and Town Centre West have been approved and development has commenced on site.

The area covered by Reserved Matters application reference 585/APP/2016/4504 dated 18-03-22 for the Town Centre West Phase overlapped with the area of the site covered by this application. The Reserved matters consent approved 23 Town Houses on the area of land East of the Mons Barrack block on which 90 residential units are proposed within the current application.

Application reference 585/APP/2017/2819 dated 14-03-19 granted consent for 'Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.'

The current application is for the Reserved Matters relating to this outline consent. It should be noted that the outline consent included a number of conditions which secured the need for details to be provided to and approved by the Local Planning Authority.

4. Planning Policies and Standards

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

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

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The London Plan (2021)
- The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

The proposed development would be assessed against the policies and proposals in the Development Plan set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

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.EM6	(2012) Flood Risk Management
PT1.H1	(2012) Housing Growth
PT1.H2	(2012) Affordable Housing
PT1.HE1	(2012) Heritage

Part 2 Policies:

DMAV 1	Safe Operation of Airports
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density

DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- 13th April 2022

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

Consultation letters were sent to 131 local owner/occupiers on 14/03/22 and site notices were also posted. Two letters of objection have been received that can be summarised as:

- Insufficient parking
- Proposed electric vehicle charging facilities are inadequate
- Removal of some of the trees along Burton Road/junction with Churchill Road is unnecessary
- Existing poor quality landscaping
- Increased pressure on amenities, including schools and transport

LONDON FIRE BRIGADE

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required. Please note that full documentation will be expected when contacting LFB for a building regulations consultation, in order to provide a more detailed response.

The Applicant is advised to ensure the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector who in some circumstances may be obliged to consult the Fire Authority.

Internal Consultees

POLICY OFFICER

Housing Size Mix

Policy H10 of the London Plan (2021) states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes local evidence of need. Policy DMH 2 of Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.

Family housing is defined within the glossary of the London Plan (2021) and outlines it must generally be of a size that has three or more bedrooms. It is worth noting that the Secretary of State directed changes to Policy H10, in order address the need for new family housing, to prevent families from being forced to move outside of London. These changes were incorporated into the final version of the London Plan (2021). It should be noted that the adoption of the Local Plan: Part 2 (2020) and London Plan (2021) policies on housing size mix are a significant shift from previous iterations of the development plan.

The proposal would be for the following housing size mix:

- 29 x 1 Bedroom (32.2%)
- 49 x 2 Bedroom (54.4%)
- 12 x 3 Bedroom (13.3%)

The proposal has increased the number of family units by one since the pre-application submission. It is clear that the site still does not conform to the council's local evidence of housing need. In terms of the site-specific factors outlined in Policy H10 that may allow a different mix, it is noted that the site is within the Uxbridge Town Centre boundary, albeit at the very edge. However, it is not near to a station and has a PTAL rating of only 2. The scheme is purely residential and there is no requirement to provide non-residential development, which may reduce the ability of the site to provide family units. Furthermore, there are not deemed to be any other site constraints which would prohibit the inclusion of a much higher proportion of family units.

As previously outlined in November 2021, the housing mix for the previous application (585/APP/2016/4504) was only considered to be acceptable on balance with the inclusion of 27 townhouses. This proposal seeks to replace these family sized units with just 12 equivalent properties. It is not considered that Paragraph 7.40 of the Planning Statement explains how the proposal is in conformity with the relevant policies or justifies a departure from them.

Case Officer comments:

The outline consent for the site included a proposed housing mix that was considered acceptable and approved, taking into consideration that the wider St Andrews Park development has provided significant levels of family housing. Phases 1, 2, 3, 4 and 6 have delivered the majority of their units as family dwellings. Through pre-application discussions the number of 3 bed units has increased. Following receipt of the above comments the applicant has further increased the number of 3 bed units from 12no to 14no. The Council's Policy Officer has confirmed that the level of family housing is now considered to be acceptable.

ACCESS OFFICER

This application is for reserved matters pursuant to planning permission 585/APP/2017/2819 for 90 residential dwellings 10% of which are required to be wheelchair user dwellings in accordance with the 2016 London Plan policy 3.8, with all remaining units to the M4(2) standard.

1. Condition 8 of the above approval requires an allocated and dedicated parking space to each of the residential units. It is unclear how this arrangement could work, firstly because only 63 spaces (0.7 spaces per unit) are proposed for 90 residential units, and secondly, where parking is provided, all M4(3) units should each be allocated a dedicated parking space (as set out in Approved Document M).

2. As required by Condition 11 drawing no. LEO-BDP-ZZZZ- DR-A-PL-1418, Rev. P01 has been submitted for the M4(3) unit design. Accessible housing should be interspersed throughout the buildings and across all types and tenures. One bed units are of little use to most wheelchair users therefore, of the required nine M4(3) units, five x 2 bed and four x 3 bed units should be provided.

3. The Design and Access Statement should be amended to reflect the above changes and submitted to ensure compliance with Condition 4 of the above Outline Approval.

Conclusion: amendments are requested as per points 1-3 above.

Case Officer comment's:

It should be noted that Condition 8 of the outline consent requires that the parking be allocated to the residential use proposed and the parking level provided is in accordance with the outline consent. In addition no one bed units are proposed as M4(3) units. The Council's Access Officer's comments were provided to the applicant who has provided a response setting out the impact of increasing the number of 3 bedroom M4(3) units, as set out within Section 7.12 of this report. The Council's Access Officer has reviewed this response and confirmed that they no longer require any amendments to the proposals.

FLOODING

The landscaping plan does not show it integrates with the need to deliver Condition 15 on surface water management as requested and specified in the planning application that Surface Water detailed design will include a variety of Sustainable Drainage Measures within the site. This may mean that requirements are required to the landscaping plan in order to meet requirements within any subsequent drainage plan submitted.

It is not indicated how in the landscaping plan this complies with requirements that all amenity space should also be designed to be dual purpose and above ground solutions where possible at the source to control water other than some indicated permeable paving. Many of the landscaped area appear raised rather than lowered i.e. where it first reaches the ground rather than being conveyed elsewhere.

Case Officer's comments:

These comments were provided to the applicant who has advised on the proposed sustainable drainage techniques. In addition Condition 15 attached to the outline consent ref. 585/APP/2017/2819 requires the full details of a drainage strategy, detailing any on and/or off-site drainage works, including surface water drainage, to be submitted and approved by the local planning authority. The submitted Landscape Masterplan provides sufficient flexibility to incorporate sustainable drainage techniques and the detailed landscape arrangement will be secured via the future discharge of Condition 7.

LANDSCAPE ARCHITECT

This submission has been the subject of a pre-application presentation and discussion on 20 January 2022. The current D&AS (2.02) highlights three aspects of the landscape which were discussed:

- The indicative landscape proposals are acceptable in principle, but the functionality of the proposed spaces should be defined within the RM submission.
- It is accepted that Dowding Park can accommodate the playspace requirements of children above the age of 5.
- Defensible space should be provided in relation to the lower ground and ground floor apartments to ensure privacy.

The current submission includes a Landscape Strategy Report, prepared for VSM by Allen Pyke, dated 22 March 2022. The introduction confirms that the report has been prepared to support Condition 7 of the outline planning application ref. 585/2017/2819. The landscape strategy is in accordance with previously supported objectives, as summarised in section 2.0

An Urban Greening Factor of 0.36 has been calculated with an accompanying table and masterplan in section 3.0 The landscape typologies comprise; flower-rich perennial planting (score:1550), existing tree cover (score: 400), intensive green roof (score 300), hedges / shrubs (score: 100), with permeable paving contributing 79 and new tree planting 76. The overall score may need to be revised downwards if the scheme is amended or mature trees removed.

Section 4.0 provides illustrative details and images of hard landscape materials including paving and external furniture.

Section 5.0 analyses the play space strategy, with reference to the London Plan Policy S4 and Hillingdon's policy DMHB19. The scheme provides < 200m² of informal play space for children of 0-5 years. The scheme will rely on its proximity to Dowding Park, within 100m of the site, for play and sporting activity for older children.

Section 6.0 outlines the planting strategy, with indicative species selections. In accordance with previous proposals this will include the retention of the existing trees, new tree planting with both

large and small /medium size trees, hedges, shrub/herbaceous mixes and flowering / species rich lawns.

Ecology and sustainability are considered in section 7.0, with the importance of suitable species selection and management / maintenance regimes acknowledged. One possible missed opportunity is the management of the wide grass verge beneath the trees alongside Burton Road.

Recommendations

1. The landscape strategy highlights the need for defensible space around ground floor (ground level and podium level) windows. The use of structural planting (hedges) is specified. These should be located on the outside of any railings / fences and maintained by the estate/ landscape management company, to ensure that they are consistently managed and maintained across the scheme - with any failed plants replaced with the same species.

2. The landscape strategy confirms; 'existing trees to be retained in accordance with the approved tree retention plan'. A recent tree report by Artemis has been queried because it recommends the felling and removal of two of the mature Horse chestnuts along the Burton Road frontage which have hitherto been scheduled 'to be retained'. Clarification is required following advice from the Council's Arboricultural Manager.

3. Refer to the above notes regarding the potential downgrading of the UGF score, if it is found necessary to remove mature trees from the site.

4. There may be ways of enhancing the UGF and biodiversity of the site, by creating a wildflower, or floral, meadow under the trees alongside Burton Road. If this is done, the species mix should allow good sight lines and have close-mown edges to provide sharp definition. Other considerations include the provision of extensive green roofs beneath the PV's at roof level.

5. As noted by the drainage officer, there is no reference to SUDS, or how the landscape contributes to the SUDS strategy.

Case Officer comment's:

With regard to the revised Tree Removal / Retention Plan ref. 268-TS-02 Rev P2 that shows that an additional tree needs to be removed from the site, the Council's Arboricultural Manager has visited the site and has agreed with the conclusions. The revised Landscape Masterplan (ref. 2683-LA-03 LEO MONS GMP_RevP7) includes an additional no. 5 trees (no. 3 in location of T49 and no. 2 to the south of Block B) to replace T49. The proposed replacement trees ensure the originally submitted UGF score of 0.36 is retained. The submitted Landscape Masterplan provides sufficient flexibility to incorporate sustainable drainage techniques and the detailed landscape arrangement will be secured via the future discharge of Condition 7.

ARBORICULTURAL MANAGER

I went and had a look at this just now. Both T40 and T49 are Horse Chestnuts, they have flushed with their spring leaves and have full canopies however on closer inspection their trunks have lots of decay and on this basis I would agree with the U category.

HIGHWAYS OFFICER

The Highway Authority require dropped kerbs and tactile paving is provided on the footways either side of Burton Road and Churchill Road entrances. Within the site double yellow lines should be provided at each of these access roads. This is to keep these areas free of parked cars which would otherwise obscure sight lines and hinder refuse vehicle access to the collection points as well as emergency service access.

To protect pedestrians using the ramp to access the lower ground level parking 1.5m wide coloured

surfacing should be provided with pedestrian markings to indicate it is where pedestrians should walk. This should be provided on the northern side of the ramp.

The doors to the Core 1 and Core 2 Cycle storage should open inwards.

Subject to the above there are no highway objections to this proposal.

HIGHWAYS OFFICER further comments

In their letter dated 8th September 2022 the applicant gave a satisfactory response to all the points raised by the Highway Authority. There are no highway objections to this proposal.

URBAN DESIGN AND CONSERVATION

The reserved matters application seeks to agree details for internal access, layout, scale, appearance and landscaping pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19 for the erection of up to 90 dwellings (Use Class C3).

The principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access, movement, tree retention / removal.

The proposed massing sits within and accords with the details shown on the approved parameter plan under the outline consent. No objection is raised to the siting and layout of the blocks as proposed. The separation distances between the habitable rooms of the proposed and adjacent blocks look to be acceptable, however, the separation distances on the north side are below 21 metres. It would be useful to see the window positions of TCW3a and TWC 3b in relation to those of the proposed scheme to determine any impacts.

The design of the elevations has been developed further from those presented at pre-application stage. The breaking down of the facade with recessed bays and decorative brick elements including the emphasis of the ground floor is supported and will help to break up the mass of the development and provide visual interest.

The design is generally considered acceptable and respectful to the surrounding development and should sit 'quietly' with the locally listed Mons Block to the west whilst also having a shared visual language with the other Town Centre West development.

The primary facing material of brick is supported in principle. The contrasting colours of red and dark blue brick would respect the established palette of materials in the locality and are an appropriate response. It will be important for the colour, tones and texture of the brick to be agreed along with the colour of the mortar. These could be controlled by conditions.

The principal entrances still do not appear to be celebrated enough and appear lost in the facade. These should be emphasised more possibly by the use of signage with the name of the residential block. Further detailed drawings of the communal entrances should be submitted.

There are concerns with the residential unit on the north elevation which is set below ground level. This would have an extremely poor outlook directly onto a blank retaining wall. The drawings also suggest that there would be a hedge around the top of the lightwell, but this would likely have to be railings on safety ground and would exacerbate the sense of enclosure. It would be more successful if the unit became a duplex encompassing the first-floor unit so that dwelling has a much improved outlook.

The detailed design of the access to the carparking is not shown in detail. Although this is not visible on the elevational drawings it would, in reality, be a prominent element due to the extent of

excavation required to incorporate the access road and would be visible to passers-by. This will need to be carefully detailed so that it does not draw undue attention and detract from the development. I would suggest additional detailed proposals for the vehicular entrance are also submitted with the application.

URBAN DESIGN AND CONSERVATION 2nd comments

The amended drawings received 21 /09/22 have addressed previous design concerns.

The submitted revised drawings refs. LEO-BDP-ZZ-00-DR-A-PL-1210 - Proposed Plan - Level LG_P08 and LEO-BDP-ZZ-00-DR-A-PL-1211 - Proposed Plan - Level 00_P11) show that the previously proposed northern lower ground floor unit, that was enclosed by a lightwell, has now been removed and replaced with two 3-bed duplex units across the lower ground and ground floors. This is a welcomed change that results in a better outlook for the residential units.

The proposed residential entrances are now better celebrated and are more visible on the elevation making the building more legible. These amendments are also supported. The proposed car parking entrance is now shown in more detail. Views towards this area will be framed by Block A and B and it is agreed that views would primarily be directed towards the podium landscaped area due to entrance being partially below ground level. The detailed design of this secondary element would not detract from the overall design quality of the development and is supported.

The amendments are considered acceptable and have addressed previous design concerns. No further objection is raised to the development.

DAYLIGHT AND SUNLIGHT CONSULTANT

Impact on neighbouring properties

P2 have included a section outlining the daylight amenity of the neighbouring consented St Andrews Blocks with the proposal in place.

P2 conclude from the analysis that while there may be several daylight alterations within these proposed blocks as a result of the development, they will not be material alterations.

AY are in agreement with the P2 conclusion that is no material change in the overall daylight levels to what was previously considered acceptable by the council.

Conclusions

Based on the previous Guidelines, AY are generally in agreement with the scope of properties assessed and methodology used in relation to the neighbouring assessments.

AY are in agreement with the implementation of the sunlight and overshadowing methodologies and the conclusions reached. The daylight and impacts on the consented neighbouring buildings are considered to be acceptable based on the negligible change in position with the introduction of the proposed.

Overshadowing

P2 carried out the required overshadowing assessments and reported on them in their February 2022 report based on the 2011 guidance. The February report outlined that the amenity areas assessed would be compliant for overshadowing against the 2011 BRE Criteria. As the proposed massing is the same and the methodology used for overshadowing has not changed with the 2022 guidance there is no requirement for further assessment.

Internal Daylight and Sunlight

From a review of the internal daylight, sunlight assessments undertaken we are satisfied that the scope is sufficiently comprehensive.

Daylight - The report outlines that 234 of the 256 rooms (91%) of rooms assessed within the proposed block will meet the lux targets set out in the guidance when LKD's are assessed against a 150 lux target. From a review of the results AY can confirm this is correct. While we would as standard practice also assess LKD's against a 200 lux target we agree these results demonstrate a high level of daylight compliance.

Sunlight - The report outlines that 82% of units will meet the BRE criteria for sunlight exposure regardless of orientation and that the majority of units failing are north facing. Following our review AY can confirm these statements are correct.

AY are satisfied with P2 conclusion that the schemes daylight and sunlight internal amenity is acceptable as per the 2022 guidance.

WASTE STRATEGY

The planning application states that the distance from the collection vehicle to the bin store is 25 meters in distance although the council policy states that the maximum pull distance for containers is 10 meters.

Ensure that there are dropped kerbs at every location a collection vehicle will stop.

Regarding the basement car park - please confirm the maximum height of vehicles to enter this basement.

WASTE STRATEGY 2nd comments

Please ensure there is a dropped kerb on each path from bin store to where the collection vehicle can safely stop. All other measures are satisfactory.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Paragraph 119 of the NPPF (2021) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Policy GG4 of the London Plan (2021) seeks to ensure that more homes are delivered. This is reinforced by Policy H1 of the Local Plan: Part 1 - Strategic Policies (2012) which gives general support to housing provision to meet and exceed the Council's minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.

The principle of the proposed development was established under the site wide outline planning consent for the former RAF Uxbridge site and under the outline planning consent reference 585/APP/2017/2819 for this site that granted permission for 'Outline planning application with means of site access from the central access road (internal access, layout, scale, appearance and landscaping reserved for subsequent approval) for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works.'

7.02 Density of the proposed development

Policies H1 and SD6 of the London Plan (2021) encourage the comprehensive mixed use redevelopment of sites to enable the provision of high density residential and mixed use

development in accessible locations, whilst also supporting the overall vitality of town centres. Policies D1 to D4 of the London Plan (2021) place greater emphasis on a designed approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure.

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states Hillingdon will apply the density standards in a flexible manner, according to local circumstances. Supporting paragraph 5.66 recognises that areas such as Uxbridge town centre are more suited to higher density development, which in some cases may exceed London Plan Standards.

Numerical density standards have recently been removed from the adopted London Plan 2021 to avoid the quantitative standards being applied mechanistically.

The site has an approximate area of 0.7ha and therefore the proposed scheme has a density of 129 units per hectare which sits within the density range recommended by the London Plan at the time of the outline consent being approved.

The density proposed is now slightly below that recommended by Policy DMHB 17 and the supporting Table 5.2 which has a range of 165 to 405 u/ha for Uxbridge Town Centre sites. However this suggested density range is for areas with a PTAL of 4-6 and the application site has a PTAL rating of 3, with a small section of PTAL rating 2. The density range within Table 5.2 for 'Other Town Centres' with a PTAL of 2-3 is 80 to 170 u/ha within which the proposed density sits.

As stated above Policy DMHB 17 states Hillingdon will apply the density standards in a flexible manner, and the numerical density standards have recently been removed from the adopted London Plan 2021.

Therefore, the proposed density is considered to be appropriate, in particular when compared to the 27 units previously consented and as such represents an optimisation of the site. In addition the outline scheme was considered to represent an appropriate density for the site and development of up to 90 dwellings was consented and has therefore been established under consent reference 585/APP/2017/2819.

HOUSING MIX

Policy H10 of the London Plan (2021) states that new development should consist of a range of unit sizes, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3 bedroom properties, as identified in the Strategic Housing Market Assessment 2016.

In accordance with Policy DMH 2 Hillingdon Local Plan: Part 2 - Development Management Policies (2020), developments should demonstrate how the provision of family housing has

been optimised, to address local needs.

This scheme's location is now within Uxbridge Town Centre as designated by the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). This is an area where a higher proportion of one and two bedroom units are considered to be acceptable as set out by Policy H10 of the London Plan (2021). The proposed development would provide 14 x 3 bedroom dwellings, which is an increase on the 12no. originally proposed at outline stage. These units would contribute towards the Borough's need for family sized housing, plus the identified substantial need for one- and two-bedroom units.

The proposed mix represents a minor conflict with Policy DMH 2 at 15.6% family units. However, on balance, the scheme is delivering 35% affordable housing that would be policy and tenure compliant. If the quantum of family units were higher, the scheme would be unable to deliver the same level of affordable housing.

Taking this into consideration, along with the sites location within Uxbridge Town Centre, the increase in family units since the outline stage and the significant number of family dwellings that have been consented or delivered within the wider St Andrews site, the mix is considered to be acceptable.

The Council's Policy Team Manager has reviewed the submitted details and confirmed that the proposed housing mix, following the increase in 3 bed units, is now deemed to be acceptable.

Accordingly, it is considered that the proposal would consist of an appropriate housing mix in accordance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021).

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

The NPPF (2021) Chapter 16 requires the conserving and enhancing of the historic environment. Paragraphs 189-208 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 201 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy HC1 of the London Plan (2021) requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, including registered historic parks, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy HE1 of the Local Plan: Part One (2012) states the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens and historic landscapes, both natural and designed.

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

A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:

i) it sustains and enhances the significance of the heritage asset and puts them into viable

uses consistent with their conservation;

- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
- iii) it makes a positive contribution to the local character and distinctiveness of the area;
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

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

A) Applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.

C) The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required.

D) Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Policy DMHB 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm or loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.

C) Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.

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

A) All development, including extensions, alterations and new buildings will be required to

be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

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

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

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The proposals are within the setting of a Grade II Listed Building - The Former Cinema Building, and a Locally Listed Building (non-designated heritage asset) - The Mons Block.

The principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access and movement and tree retention and removal. Therefore, the emerging proposals are in relation to internal layout, scale, appearance, access (internal only) and landscaping in accordance with the requirements of Condition 2 of outline planning permission ref: 585/APP/2017/2819.

The proposed massing sits within and accords with the details shown on the approved parameter plan under the outline consent. The Council's Design and Conservation Officer has reviewed the application and provided detailed comments. No objection has been raised to the siting and layout of the blocks as proposed.

The Council's Conservation and Design Officer has been involved throughout the pre-application process and raises no objections to the design of the amended proposals, noting that concerns over a proposed material can be resolved through the discharge of Condition 10 attached to the outline consent. Residential buildings were approved in this location as part of the outline consent for the development and the buildings have been designed to a high standard with architectural interest and respond appropriately to the heritage assets. The Council's Conservation and Design Officer has commented the design is considered acceptable and respectful to the surrounding development and should sit 'quietly' with the locally listed Mons Block to the west whilst also having a shared visual

language with the consented Town Centre West phase of the development. The maximum height of the buildings was reduced adjacent to the Mons Block and a separation distance secured as part of the outline planning consent.

As such the proposal is considered to be acceptable and in accordance with Policies HC1 of the London Plan (2021), HE1 of the Local Plan: Part One (2012) and DMHB 1, DMHB 2, DMHB 3 and DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

ARCHAEOLOGY

Paragraph 194 of the NPPF (2021) states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Policy HC1 'Heritage conservation and growth' of the London Plan states:

A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent

weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

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

The site is not in a location that is archaeologically sensitive. The Greater London Archaeological Advisory Service reviewed the outline application and raised no objection to the development nor requested that any conditions be attached to any grant of planning consent.

The proposed development is therefore deemed to accord with Policy DMHB 7 of the Local Plan: Part 2 - Development Management Policies (2020), Policy HC1 the London Plan (2021) and the NPPF.

7.04 Airport safeguarding

Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (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.

Heathrow Airport and the National Air Traffic Services were both been consulted on the outline application and confirmed that they had no objections to the proposals. The submitted reserved matters are within the massing parameters consented at outline stage.

The proposed development is therefore deemed to accord with Policy DMAV 1 of the Local Plan: Part 2 Development Management Policies (2020).

7.05 Impact on the green belt

Paragraph 137 of the NPPF (2021) states that the essential characteristics of Green Belts are their permanence and openness.

Paragraph 147 of the NPPF (2021) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 of the NPPF (2021) requires local planning authorities to ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Policy G2 of the London Plan (2021) states that the strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Policy DMEI 6 of the Local Plan: Part Two (2020) states that new development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries. Dowding Park is designated as Green Belt land and lies 100metres from the site.

The land directly to the east of the site within the new Dowding District Park is designated as green belt. However, the site itself is not within the green belt and is separated from the green belt by consented development that is in the final stages of construction. In addition, the location and massing of the proposed scheme was approved under the outline consent. As such the proposals are considered to have an acceptable impact on the green belt and are deemed to be in accordance with relevant policy.

7.07 Impact on the character & appearance of the area

Policy BE1 of the Local Plan: Part One (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two (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 principles of development on this site were approved as part of the outline consent, including the parameter plans showing site layout, scale, landscaping, access and movement and tree retention and removal. Therefore, the emerging proposals are in relation to internal layout, scale, appearance, access (internal only) and landscaping in accordance with the requirements of Condition 2 of outline planning permission ref: 585/APP/2017/2819.

The proposed massing sits within and accords with the details shown on the approved parameter plan under the outline consent. The Council's Design and Conservation Officer

has reviewed the application and provided detailed comments. No objection has been raised to the siting and layout of the blocks as proposed.

The design of the elevations has been developed following advice provided by the Council's Design and Conservation Officer. The breaking down of the facade with recessed bays and decorative brick elements including the emphasis of the ground floor is supported and will help to break up the mass of the development and provide visual interest.

The design is considered acceptable and respectful to the surrounding development and should sit 'quietly' with the locally listed Mons Block to the west whilst also having a shared visual language with the other the other Town Centre West development.

The primary facing material of brick is supported in principle. The contrasting colours of red and dark blue brick would respect the established palette of materials in the locality and are an appropriate response.

Concerns were raised with regard to the principal entrances as originally submitted. They were considered to not be celebrated enough and appear lost in the facade. Following design amendments to the proposals, the Council's Design and Conservation Officer has confirmed that the proposed residential entrances are now better celebrated and are more visible on the elevation making the building more legible.

Concerns were also raised with regard to the detailed design of the access to the car parking. This would, in reality, be a prominent element due to the extent of excavation required to incorporate the access road and would be visible to passers-by. Following further design amendments, the Council's Design and Conservation Officer has confirmed that the proposed car parking entrance is now shown in more detail. Views towards this area will be framed by Block A and B and it is agreed that views would primarily be directed towards the podium landscaped area due to entrance being partially below ground level. The detailed design of this secondary element would not detract from the overall design quality of the development and is supported.

In terms of materials, it is recognised that it will be important for the colour, tones and texture of the brick to be agreed along with the colour of the mortar. These details are controlled by a materials condition (Condition 10) attached to the outline planning consent.

The general layout and massing of the development has been approved under the outline planning consent. The design of the proposals has been revised in discussion with the Council's Design and Conservation area and is now considered to be acceptable and respectful to the surrounding development, including the locally listed Mons Block to the west, and to have a shared visual language with the adjacent Town Centre West development.

As such the proposals are considered to be in accordance with Policy BE1 of the Local Plan: Part One (2012), Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020).

7.08 Impact on neighbours

Paragraph 130 (f) of the NPPF (2021) states that new development should seek to 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience'.

Policy D14 of London Plan (2021) states that in order to reduce, manage and mitigate noise to improve health and quality of life, proposals should manage noise by amongst other criteria, avoiding significant adverse noise impacts on health and quality of life and 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 existing noise-generating uses.

Policy BE1 of the Local Plan: Part One (2012) requires developments to be appropriately designed so that they do not adversely affect their surroundings or the local character.

Policy DMHB 11 part B) of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that development proposals should not adversely impact on the amenity of adjacent properties and open space.

Paragraph 5.38 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: "The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary."

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook."

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space".

The proposed layout, scale and massing of the proposals has been approved as part of the outline planning consent 585/APP/2017/2819. The development proposes separation distances of over 21m between existing and proposed habitable room windows so as to respect the residential amenity of existing residents and not to cause overshadowing or overdominance of properties. Along the Eastern boundary of the site the distance between Block A and the opposite Dice Block varies between 38m and 20m. Along the Southern boundary the distance between Blocks A and B and the houses to the South is over 36m.

The exception to the 21m habitable room window distance is those windows proposed closest to the consented Town Centre West development to the north and to those within the existing Mons Block to the west.

Only 2 windows per level of Town Centre West are less than 21m from the proposed scheme (18.3m or 20m separation distances is achieved). The 18.3m separation distance is between bedrooms in the proposed northern block and dual aspect living rooms in Town Centre West Block. The separation distance is between secondary windows to each of the living rooms affected. The secondary windows could reasonably be obscured by the

resident if desired while retaining the primary view from the living space. The separation distance between living rooms in the proposed block and the narrow southern elevation of the Town Centre West development is 20.1m. The elevational treatment and position of windows has been carefully designed to mitigate privacy concerns. It should be noted that where 21m has not been achieved it is across a public street and therefore the 21m separation distance is not as rigorously applied given that members of the public already use the intervening space.

Along the Western boundary the distance between the flank end walls of Blocks A and B and the Mons Block is just over 16m. Due to this proximity all windows in the upper levels of these flanks walls are either obscured glazing or designed as a splayed bay to direct views away from the Mons Block so as not to impact on privacy for future occupiers. A condition is recommended to be attached to any grant of planning consent to secure the obscure glazing.

The Council's Daylight and Sunlight specialist has reviewed the daylight and overshadowing impacts on the consented neighbouring buildings and confirms that they are considered to be acceptable.

The proposed separation distances and impact on consented dwellings are therefore considered to be acceptable and in accordance with Paragraph 130 (f) of the NPPF (2021), Policy D14 of London Plan (2021) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.09 Living conditions for future occupiers

Policy D6 of the London Plan (2021) provides minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights that apply to all residential accommodation that is self-contained.

Internal Space Standards

Policy DMHB 16: 'Housing Standards' requires that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should meet or exceed the most up to date internal space standards.

All of the dwellings proposed comply with the internal space standards as set out in 'Minimum Space Standards for New Dwellings' of the London Plan 2021.

Amenity Space

Policy DMHB 18: 'Private Outdoor Amenity Space' of the Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the Council standards set out in Table 5.3. which are as follows:

- 1 bedroom flat - 20 sqm per flat
- 2 bedroom flat - 25 sqm per flat
- 3+ bedroom flat - 30 sqm per flat

Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

The development proposed is required to deliver the following external amenity space:

- 1 Beds x 28 x 20m² = 560m²
- 2 Beds x 48 x 25m² = 1200m²
- 3 Beds x 14 x 30m² = 420m²

Total = 2180m²

The application proposes a total of 2591m² of external amenity space across the site, including 1342.4m² of private garden and balcony amenity space and 1249m² of communal amenity space within the podium.

In total an excess of 411m² of external amenity space for use by residents of the development is proposed above the level required by Policy DMHB 18: 'Private Outdoor Amenity Space' of the Local Plan: Part 2 - Development Management Policies (2020). In addition, the site is within the wider St Andrews Park development, which includes the new 40 acre (16.2 hectare) District Park (now named Dowding Park) delivered as part of the wider scheme. Dowding Park is located close to the development site with strong pedestrian links available.

The proposal would therefore provide sufficient private outdoor amenity to fully comply with Policy DMHB 18, each property would benefit from its own private amenity space and the significant level of public open space already provided as part of the wider development, the proposed level of amenity for future occupiers is therefore deemed acceptable.

Child's Play

Policy DMHB 19 'Play Space' of the Local Plan: Part 2 - Development Management Policies (2020) states that new major residential developments which result in a significant net increase in child yield an occupancy of ten or more children will be required to provide children and young people's play facilities on-site. Where a satisfactory level of provision for children and young people's play facilities cannot be achieved on-site, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area.

Policy DMCI 5 'Children's Play Areas' of the Local Plan: Part 2 - Development Management Policies (2020) states that for all major development proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds. In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.

London Plan Policy S4 requires development proposals to make provisions for play and informal recreation based on the expected child population generated by a development. This is supported by the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10m² of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum, and makes clear that play space should not be segregated by tenure.

Based on the housing mix, the GLA calculator sets a total requirement at 10sqm per child of 324.2sqm of play space consisting of a requirement of:

- 164sqm for ages 0-4 (within 100m of the site)
- 112sqm for ages 5-11 (within 400m of the site)

- 32sqm for 12+ ages (within 800m of the site)

The application proposes up to 200sqm of play space for 0-4-year-old children to be delivered within the communal amenity space, which would be accessible to all residents. This provision is based on the maximum-case scenario and exceeds the 164sqm London Plan Policy S4 requirement.

The site is also located within 100m of the entrance to Dowding Park, which includes a play area and sports pitches. It is also located in close proximity to other play facilities (such as the play space on Churchill Road) and informal play elements in communal spaces within the wider St Andrew's Park development. These play spaces and Dowding Park are all within 400m walking distance of the site, in accordance with the distance requirements set by the London Plan for older children's offsite play spaces. The existing play facilities in the surrounding area will therefore meet the requirements for older children within the proposed scheme.

The proposed development and the surrounding network of play spaces therefore meets the needs of the future occupiers of this development in accordance with local and regional planning policies.

Public Open Space

Policy G4 of the London Plan (2021) states that development proposals should:

- 1) not result in the loss of protected open spaces
- 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency

Policy DMCI 4 (Open Spaces in New Development) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) encourages proposals for major new residential development to make provision for new open space, or enhancements to existing open space and says that proposals that fail to do so will be resisted.

The wider St Andrews Park development proposals include the new 40 acre (16.2 hectare) Dowding Park as well as other smaller areas of public space across the site, therefore the level of public open space provided as part of the wider development is considered to be acceptable and in accordance with policies G4 of the London Plan (2021) and DMCI 4 of the Hillingdon Local Plan: Part 2 (2020).

Daylight/sunlight

The National Planning Policy Framework paragraph 123, part C stipulates that "local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site."

Planning Practice Guidance (2019) Paragraph 6 of the section 'Effective use of land' states that "Where a planning application is submitted, local planning authorities will need to consider whether the proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers, as well as assessing whether daylight and sunlight within the development itself will provide satisfactory living conditions for future occupants..."

Paragraph 7 states that "All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings.

The Supplementary Planning Guidance on Housing (March 2016) states "An appropriate degree of flexibility needs to be applied when using the BRE guidelines to assess the daylight and sunlight impacts of new developments on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, larger sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."

The application was supported by an Internal Daylight, Sunlight and Overshadowing Report (P2881 V1 February 2022) which concluded that overall, the performance against the BRE criteria was excellent for a high-density regeneration scheme such as this, with the overwhelming majority of habitable rooms exceeding the relevant daylight and sunlight targets. However the report was generated prior to the new Daylight and Sunlight BRE guidelines being released in June 2022 and as such a Daylight and Sunlight Addendum was requested from the applicant that has been provided (dated 24th November 2022).

Both the original report and the addendum have been reviewed by the Council's independent 3rd party Daylight and Sunlight specialists. The addendum report outlines that 234 of the 256 rooms (91%) of rooms assessed within the proposed block will meet the lux targets set out in the guidance when Living/Kitchen/Dining rooms are assessed against a 150 lux target.

From a review of the results the Council's independent 3rd party Daylight and Sunlight specialists have confirmed this is correct and that these results demonstrate a high level of daylight compliance.

The addendum report also outlines that 82% of units will meet the BRE criteria for sunlight exposure regardless of orientation and that the majority of units failing are north facing. Following their review the Council's specialists have confirmed this is correct.

An overshadowing assessment was not included in the addendum report, as the required overshadowing assessments were provided in the original report based on the 2011 guidance. The original report outlined that the amenity areas assessed would be compliant for overshadowing against the 2011 BRE Criteria. As the proposed massing is the same and the methodology used for overshadowing has not changed with the 2022 guidance there is no requirement for further assessment.

The Council's Daylight and Sunlight specialists have confirmed that they are satisfied with details submitted and that the schemes daylight and sunlight internal amenity is acceptable as per the 2022 guidance.

The proposed scheme is therefore considered to have been developed to maximise natural daylight and sunlight availability to the new dwellings, wherever possible.

Outlook

Concerns were raised with the proposals as originally submitted due to the proposed residential unit on the north elevation which would have been single aspect and set below ground level. This unit would have had an extremely poor outlook directly onto a blank retaining wall. The drawings also indicated that there would be a hedge around the top of the lightwell, but this would likely have to be railings on safety grounds and would exacerbate the sense of enclosure. The applicants were advised that this unit was unacceptable and an alternative solution such as the unit becoming a duplex dwelling encompassing the first-floor should be investigated so as to provide a much improved outlook.

The submitted revised drawings refs. LEO-BDP-ZZ-00-DR-A-PL-1210 - Proposed Plan - Level LG_P08 and LEO-BDP-ZZ-00-DR-A-PL-1211 - Proposed Plan - Level 00_P11) show that the previously proposed northern lower ground floor unit has now been removed and replaced with two 3-bed duplex units across the lower ground and ground floors. This is a welcomed change that results in a better outlook for the residential units.

The separation distances between the habitable room windows of the blocks is 21 metres and acceptable. No single aspect north facing units are proposed. As such the level of outlook proposed for future occupiers is considered to be acceptable.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Paragraph 111 of the NPPF (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Policy T6 of the London Plan (2021) states that new residential development should not exceed the maximum parking standards set out in Table 10.3. All residential car parking spaces must provide infrastructure for electric or Ultra Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

Policy DMT 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also, that impacts on local amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing roads.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity.

The application proposes 63 car parking spaces for the 90 units, which equals a parking ratio of 0.7 car parking spaces per unit. 7 of the car parking spaces would be accessible spaces, which is 10% of the total. In terms of cycle parking 90 long stay spaces are proposed, including 10 spaces for larger cycles. In addition, 5 motorcycle parking spaces would be provided. The level of parking proposed accords with the details approved as part the outline consent as secured by Condition 7 and is therefore deemed to be acceptable.

Under the outline consent a contribution of £8,000 towards Highways Improvements was secured along with the requirement for a Travel Plan with £20,000 bond.

The Council's Highways Officer has reviewed the details submitted as part of the reserved matters application and requested that dropped kerbs and tactile paving is provided on the footways either side of Burton Road and Churchill Road entrances. Within the site double yellow lines should be provided at each of these access roads. This is to keep these areas free of parked cars which would otherwise obscure sight lines and hinder refuse vehicle access to the collection points as well as emergency service access.

Following discussions with the applicant dropped kerbs and tactile paving are now provided as requested and double yellow lines introduced (revised drawings refs LEO-BDP-ZZ-00-DR-A-PL-1210 Rev P08 and LEO-BDP-ZZ-00-DR-A-PL-1211 Rev P11). Full details of hard surfacing materials are required as part of the discharge of Condition 7 on the outline permission.

The Council's Highways Officer requested that the doors to the Core 1 and Core 2 Cycle storage should open inwards and the scheme has been amended to incorporate this request.

To protect pedestrians using the ramp to access the lower ground level parking, the Highways Officer requested that 1.5m wide coloured surfacing should be provided with pedestrian markings on the ramp to indicate it is where pedestrians should walk. These details were provided to the applicant who has responded to clarify that the ramp on the southern side is provided for vehicle access and the pedestrian access to the lower ground parking is provided via the cores. Pedestrian use of the ramp is not intended to be encouraged for safety reasons, and as a result, they considered that provision of pedestrian markings would encourage pedestrian use of this ramp. Furthermore, access to the car park via the ramp will be controlled via a roller shutter door and therefore it would not be a key route for pedestrians. Pedestrian access is provided from the street via surface level entrances at the main cores, and residents or other pedestrians can enter and exit the car park through the main residential cores. The Council's Highways Officer has confirmed that they accept this response and raise no more objections to the proposals.

As such the proposals are now deemed to accord with Paragraph 111 of the NPPF (2021), Policy T6 of the London Plan (2021) and Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

7.11 Urban design, access and security

CRIME PREVENTION

Policy D11 of the London Plan (2021) requires development proposals to contribute to the minimisation of potential physical risks and include measures to deter crime and anti social behaviour.

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;

- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

The proposed development was reviewed by the Metropolitan Police Secure by Design Officer at outline stage and the development is considered to adhere to the principals of Secure by Design and no objections have been raised.

In addition, Condition 9 of the outline planning permission requires full details of security measures to achieve the Secured by Design accreditation to be submitted prior to occupation of the development.

7.12 Disabled access

Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design. They should:

- 1) be designed taking into account London's diverse population;
- 2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
- 3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
- 4) be able to be entered, used and exited safely, easily and with dignity for all; and
- 5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Policy D7 of the London Plan (2021) states:

A) To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:

- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

Condition 11 of the outline consent requires that 10% of the units shall meet the standards for M4(3) 'wheelchair user dwellings' and the remainder shall meet the standards for M4(2) 'Accessible and adaptable dwellings' as set out in Approved Document M to the Building Regulations (2015).

The Council's Access Officer has reviewed the proposals and requested that additional parking spaces be provided for the accessible units so that each of the 9 units would have its own accessible space. However, as per the outline consent Condition 7, the proposed scheme is required to provide 10% of the parking spaces as accessible, which the submission is in accordance with (7 out of the 63 approved spaces).

In addition to complying with the requirements of the conditions under the outline consent, the proposed 7 accessible spaces for a 90-unit development exceed the requirements of London Plan (2021) Policy T6.1(g). Policy T6.1(g) states that 3% of overall dwellings should have designated disabled parking bays from the outset and it should be

demonstrated how an additional 7% provision could be provided for in the future on request. The proposed development provides 8% provision of designated disabled parking bays when compared to the overall unit number (90 units) and therefore exceeds the requirement to provide 3% provision from the outset.

The applicant has confirmed that there is potential to provide additional designated disabled parking bays in the future if required; a matter which can be appropriately dealt with when seeking to discharge Condition 8 of the outline consent which requires the submission of a Parking Allocation Scheme. The allocation of accessible parking bays would be based on residential demand in line with London Plan (2021) Policy T6.1(g). 10% provision based on unit nos. would result in a loss of no. 2 parking bays, which would reduce the overall parking ratio below the requirement set out by Condition 7.

The Council's Access Officer has also requested that accessible housing should be interspersed throughout the buildings and across all types and tenures, noting that one bed units are of little use to most wheelchair users. Policy D7 of the London Plan (2021) notes that the provision of accessible housing is to "provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children". The proposals provide 9 no. 2 bedroom units as M4(3) wheelchair accessible; i.e. 10% of the overall unit number. No one-bedroom accessible units are proposed in direct response to the feedback received at pre-application stage. The Access Officer's request to provide three-bedroom accessible units was put to the applicant who confirmed that the provision of three-bedroom wheelchair accessible units would result in an overall decrease of three bedroom units within the scheme within the constraints of the consented envelope. This would be in direct conflict with the feedback received from the Council's Policy Officer who is seeking to maximise the provision of three bedroom units for families.

Unit Type 2A has been designed so that they can be delivered without structural alteration as a 2 bed 4 person M4(2) unit or a 2 bed 3 person M4(3) Wheelchair User Home. 9 of the 13no. proposed Type 2A units are proposed to be delivered as Part M4(3) Wheelchair User Homes in accordance with Condition 11 of the outline consent. The location of the part M4(3) units is required to be confirmed prior to occupation in accordance with Condition 11

The Council's Access Officer has accepted the above and therefore raises no objections to the proposals. The proposals are therefore deemed to accord with Policies D5 and D7 of the London Plan (2021).

7.13 Provision of affordable & special needs housing

AFFORDABLE HOUSING PROVISION

Policy H4 of the London Plan (2021) sets out a strategic target for 50 percent of all new homes delivered across London to be genuinely affordable and that major developments which trigger affordable housing requirements should be subject to the threshold approach (Policy H5).

Policy H2 of the Hillingdon Local Plan: Part 1 (2012) states that housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.

Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020) states that 50% affordable housing should be delivered with the tenure split 70% Social/Affordable Rent and 30% Intermediate. In exceptional circumstances, where on-site provision of affordable housing cannot be delivered and as a last resort, a financial contribution will be required to provide off-site affordable housing on other sites which may be more appropriate or beneficial in meeting the Borough's identified affordable housing needs.

The Mayor's Affordable Housing and Viability SPG and Policy H8 of the London Plan set out that as well as ensuring no net loss of affordable homes, all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.

The NPPF directs that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

As noted in this report, through the outline planning consent for the wider St Andrew's Park development the site has existing planning consent for 27 town houses, which is part of the Phase known as 'Town Centre West'. As the affordable housing provision relating to these 27 no. townhouses within the Town Centre West Reserved Matters application were incorporated into the apartment buildings to the north, the provision of affordable housing within the outline consent for this site area was calculated on the basis of the uplift of 63 units (i.e. 90 units minus the 27 units who's affordable housing contribution is provided elsewhere).

However, as the Town Centre West Phase was not under construction at the time the outline consent for this site was granted, in order to safeguard maximum delivery of affordable housing, two proposals for the provision of affordable housing were secured by the legal agreement:

1. 35% delivery of the uplifted housing numbers subject to the Town Centre West Phase being under construction prior to occupation of this development, OR
2. 35% on-site delivery within the extent of this outline planning application.

The scheme as proposed would provide 35% affordable housing on the uplift above the TCW proposals (calculated by habitable room) with a 30:70 split between affordable rented and intermediate products. The exact location, layout, tenure and unit split of the affordable housing will be confirmed as part of the discharge of the first obligation of Schedule 1 of the Section 106 Agreement of the 2019 outline permission ref. 585/APP/2017/2819.

The application will deliver policy compliant levels of affordable housing, secured via the legal agreement. Therefore, the affordable housing provision is deemed acceptable and in accordance with Policy H4 and H5 of the London Plan (2021), Policy H2 of the Hillingdon Local Plan: Part 1 (2012), Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020)

The Mayor's Affordable Housing and Viability SPG and the NPPF.

7.14 Trees, landscaping and Ecology

Policy EM4 (Open Space and Informal Recreation) of the Local Plan: Part 1 - Strategic Policies (2012) says that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing

spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities. The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) including front and back gardens for the benefit of wildlife and a healthier lifestyle, mitigating climate change.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states (amongst other things) that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit and that development proposals will be required to provide a landscape scheme. The policy also seeks to protect existing trees through tree root protection areas and an arboricultural method statement where appropriate. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

The Council's Landscape Architect has reviewed the proposed scheme and provided detailed comments, recommending the need for defensible space around ground floor (ground level and podium level) windows. The use of structural planting (hedges) is specified within the proposals. These should be located on the outside of any railings / fences and maintained by the estate/ landscape management company, to ensure that they are consistently managed and maintained across the scheme. These details can be secured through Condition 7 of the outline consent. An informative is recommended to be attached to any grant of planning consent to remind the applicant of the need to provide these details.

The applicant has provided a revised Tree Removal / Retention Plan ref. 268-TS-02 Rev P2 that shows that an additional tree needs to be removed from the site tree no. T49 when compared to the details approved under the 2019 outline consent. This tree needs to be removed as the submitted Tree Survey recommended the tree is felled to ground on the basis as its structural condition has significant defects that can't be remediated.

The Council's Arboricultural Manager visited the site to assess the trees in question and confirmed their poor state of repair, with their trunks showing significant levels of decay. The loss of Trees T40 and T49 is therefore considered acceptable.

The revised Landscape Masterplan (ref. 2683-LA-03 LEO MONS GMP_RevP7) includes an additional 5no. trees (3no. in location of T49 and 2no. to the south of Block B) to replace T49. The proposed replacement trees can be secured through Condition 7 of the outline consent. An informative is recommended to be attached to any grant of planning consent to remind the applicant of the need to provide these additional tree details. The additional trees also ensure the originally submitted UGF score of 0.36 is achieved.

As such the proposed landscaping is deemed to be acceptable and in accordance with

Policy EM4 (Open Space and Informal Recreation) of the Local Plan: Part 1 - Strategic Policies (2012) and Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.15 Sustainable waste management

WASTE STRATEGY

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) states that development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

This is supported by Policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012).

Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan (2021) states:

A Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

- 1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
- 2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products
- 3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- 4) meet or exceed the municipal waste recycling target of 65 per cent by 2030¹⁶³
- 5) meet or exceed the targets for each of the following waste and material streams:
 - a) construction and demolition - 95 per cent reuse/recycling/recovery
 - b) excavation - 95 per cent beneficial use¹⁶⁴
- 6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

The Council's Waste Strategy Officer has reviewed the submission and following the receipt of further details, including proposed dropped kerbs, has confirmed that the details are acceptable. As such the proposals are deemed to be in accordance with Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan (2021), Policy EM11 of the Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

7.16 Renewable energy / Sustainability

Policy SI 2 of the London Plan (2021) requires major developments to be net zero-carbon. Major development proposals are expected to include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided that an alternative proposal is identified and delivery is certain.

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 (March 2016).

Policies DMEI 1, DMEI 2 and DMEI 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) relate to reducing carbon emissions (and decentralising energy) and require that all developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

The outline planning consent for the wider St Andrew's Park development as approved under application reference 585/APP/2009/2752 and amended under planning permission reference 585/APP/2015/848 proposed the provision of 'exemplar' Code for Sustainable Homes Level 6 dwellings within the location of the current application site. Whilst the majority of the wider site is being brought forward in line with the site wide consent the outline consent superseded the outline planning permission.

The outline application was supported by a Sustainability and Energy Statement that was reviewed by the Council's Sustainability Officer who raised a concern with the proposed scheme as it failed to provide an exemplar level of development in terms of energy and sustainability. Given this standard was required as part of the outline consent, and the rest of that scheme was coming forward, it was deemed appropriate for this phase to meet that same standard of sustainability. The applicant was informed of these concerns and entered discussions with the Council's Sustainability Officer. An addendum was subsequently submitted to the original Energy Strategy (Addendum dated April 2018) which was reviewed by the Council's Sustainability Officer and confirmed as acceptable. The developer confirmed through the amended document that the scheme would be exemplar through being 'on-site' zero carbon. The addendum was included within the approved documents list when the outline application was approved in order to secure the level of sustainability required.

As originally submitted the RMA application provided little detail of how it would be in accordance with the Energy Strategy Addendum. When this matter was raised with the applicant they provided additional details in the form of a supporting letter dated 26th April 2022 that included CO2 emissions calculations. The proposed solution to achieve zero carbon on site is the extensive use of photovoltaics (PVs) and as such these details were requested. The applicant responded to say that at present it is not possible to provide full details of the PVs, though they have set aside sufficient space within the roofs of the development (drawing reference LEO-BDP-ZZ-05-DR-A-PL-1216 Rev P02) and confirmed that the PVs will not be visible from the streetscene. It has therefore been agreed with the applicant and the Council's Sustainability Officer that should the application be approved, a condition will be attached to the consent requiring full details of the PVs to be submitted and approved.

It should be noted that should the proposed PVs fail to deliver net zero carbon on this site then a s73 application would be required to amend the Energy Strategy. Such a proposal is highly unlikely to be considered favourably given the initial commitments set out.

Subject to the PV condition, the application is deemed to be in accordance with Policy SI 2 of the London Plan (2021), Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies DMEI 1, DMEI 2 and DMEI 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.17 Flooding or Drainage Issues

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

The Council's Flood and Water Management Officer has reviewed the proposals and raised some concerns with regards to how the landscaping will integrate with the required surface water management including any sustainable drainage measures within the site. It is also not indicated in the landscaping plan how the amenity space has been designed to be dual purpose, and what above ground solutions are proposed to control water other than some indicated permeable paving.

These comments were provided to the applicant who has advised that the following sustainable drainage techniques for the surface water drainage of the Land East of Mons Block are proposed:

- Source control - the Landscape Strategy is proposing the use of 350 m2 of intensive green roof/vegetation.
- Pervious pavements to allow rainwater run-off to infiltrate below finished development surfaces and provide storage if needed.

Condition 15 attached to the outline consent ref. 585/APP/2017/2819 requires the full details of a drainage strategy, detailing any on and/or off-site drainage works, including surface water drainage, to be submitted and approved by the local planning authority. The submitted Landscape Masterplan provides sufficient flexibility to incorporate sustainable drainage techniques and the detailed landscape arrangement will be secured via the future discharge for Condition 7.

The applicant's have advised that a detailed landscaping design and detailed Drainage Strategy will be developed accordingly to address the requirements of Conditions 7 and Condition 15 respectively. As such the proposed details are considered to be acceptable at this stage, noting that further details are required to be submitted and approved.

7.18 Noise or Air Quality Issues

AIR QUALITY

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy SI 1 of the London Plan (2021) further supports this.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) states:

- 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 improvement of air quality, especially within the Air Quality Management Area.

The Council's Environmental Protection Unit reviewed the submitted details at outline stage and confirmed that they had no objections to the proposals. No air quality issues were raised and no contribution towards air quality was deemed to be required to be secured via the outline s106 agreement. It should be noted that air quality contributions were secured as part of the site wide planning consent for St Andrews.

7.19 Comments on Public Consultations

Where comments relate to material planning considerations they have been considered within the body of this report.

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states:

A) 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. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

B) Planning obligations will be sought on a scheme-by-scheme basis:

- i) to secure the provision of affordable housing in relation to residential development schemes;
- ii) where a development has infrastructure needs that are not addressed through CIL; and
- iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

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

It should be noted that this is a reserved matters application and the relevant obligations to mitigate the impact were secured under the outline permission. The Heads of Terms agreed under the outline consent reference 585/APP/2017/2819 were:

1. Contribution of £8,000 towards Highways Improvements.
2. Travel Plan (with £20,000 bond)
3. Affordable Housing on site (tenure delivery 70% social rent, 30% intermediate) (35% of the uplift calculated by habitable room if the 'Town Centre West' Phase is delivered or 35% of all units consented under this application).
4. Construction Training: Training Costs: £2500 for every £1m build cost + Coordinator Costs: 28/160 x £71,675
5. Project Management & Monitoring Fee: 5% of total cash contributions.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m² or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable is as follows:

- Residential Dwelling Houses (C3) - £95 per square metre

7.21 Expediency of enforcement action

None

7.22 Other Issues

CONTAMINATED LAND

Paragraph 183 of the NPPF (2021) states that planning policies and decisions should ensure that:

- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
- b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

Paragraph 184 of the NPPF (2021) states that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

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

Policy DME1 12 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) 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.

C) Where initial studies reveal potentially harmful levels of contamination, either to human

health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

Policy DMEI 13 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Development proposals that include the importation of waste material (inert or otherwise) must be accompanied by a monitoring plan that includes:

- i) the amount and types of material to be imported;
- ii) the timetable for disposal;
- iii) onsite precautions to be taken to ensure only authorised vehicles and waste will be allowed on to site; and
- iv) methods for reviewing and reporting on the progress of the disposal to the Local Planning Authority.

B) On commencement of the disposal operation the applicant will provide a written report in accordance with A) iv) above that provides details of:

- i) the types and quantities of waste that have been imported, including carrier notices where appropriate;
- ii) the source of the waste imported to the site;
- iii) appropriate details of the company/companies importing the material; and
- iv) updates in accordance with A) iv) pertaining to the progress of material importation and disposal in compliance with the approved plans.

C) Where assurances cannot be given that the appropriate protection and safeguards can be implemented, then the Council will expect the applicant to provide contingency plans including providing security bonds (through legal agreements) to ensure any subsequent harm can be remediated and the site made good.

D) Proposals that include the importation of waste materials (inert or otherwise) that are not accompanied by the appropriate level of controls or safeguards will not be supported.

The outline consent reference 585/APP/2017/2819 included Condition 16 which relates to contamination. As this condition remains part of the consented proposals, the scheme is considered in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies DMEI 12 and DMEI 13 of the Hillingdon Local Plan: Part 2 (2020).

FIRE SAFETY

Policy D12 Fire safety of the London Plan states:

A In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space:
 - a) for fire appliances to be positioned on
 - b) appropriate for use as an evacuation assembly point
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
- 6) 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, including manufacturers' details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) 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
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

In accordance with the London Plan (2021) Policy D12, a Fire Statement has been submitted. The London Fire Brigade (LFB) have been consulted on the proposals and have raised no objections to the application.

8. Observations of the Borough Solicitor

General

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

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

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

Planning Conditions

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

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The

obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable

10. CONCLUSION

This application is for reserved matters (internal access, layout, scale, appearance and landscaping) pursuant to Condition 2 of planning permission reference 585/APP/2017/2819 dated 14-03-19. The outline application granted consent for means of site access from the central access road, now known as Burton Road, within St Andrews and for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works. Internal access, layout, scale, appearance and landscaping were reserved for subsequent approval, for which this application seeks consent.

The scale and massing are in accordance with the outline consent and the design of the proposals is considered to be appropriate. The application proposes 90 dwellings, including 28 no. 1 bedroom units (31%), 48 no. 2 bedroom units (53%) and 14 no. 3 bedroom units (16%). The proposed mix represents a minor conflict with Policy DMH 2 at 15.6% family units. However, on balance, the scheme is delivering 35% affordable housing that would be policy and tenure compliant. If the quantum of family units were higher, the scheme would be unable to deliver the same level of affordable housing.

The application site is also now within Uxbridge Town Centre as designated by the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). This is an area where a higher proportion of one and two bedroom units are considered to be acceptable as set out by Policy H10 of the London Plan (2021). The proposed development would provide 14 x 3 bedroom dwellings, which is an increase on the 12no. originally proposed at

outline stage. The Council's Policy Team Manager raises no objection to the housing mix proposed.

The Reserved Matters application is in accordance with the outline consent reference 585/APP/2017/2819 and is deemed to essentially accord with relevant local and national policies while delivering a substantial number of new dwellings.

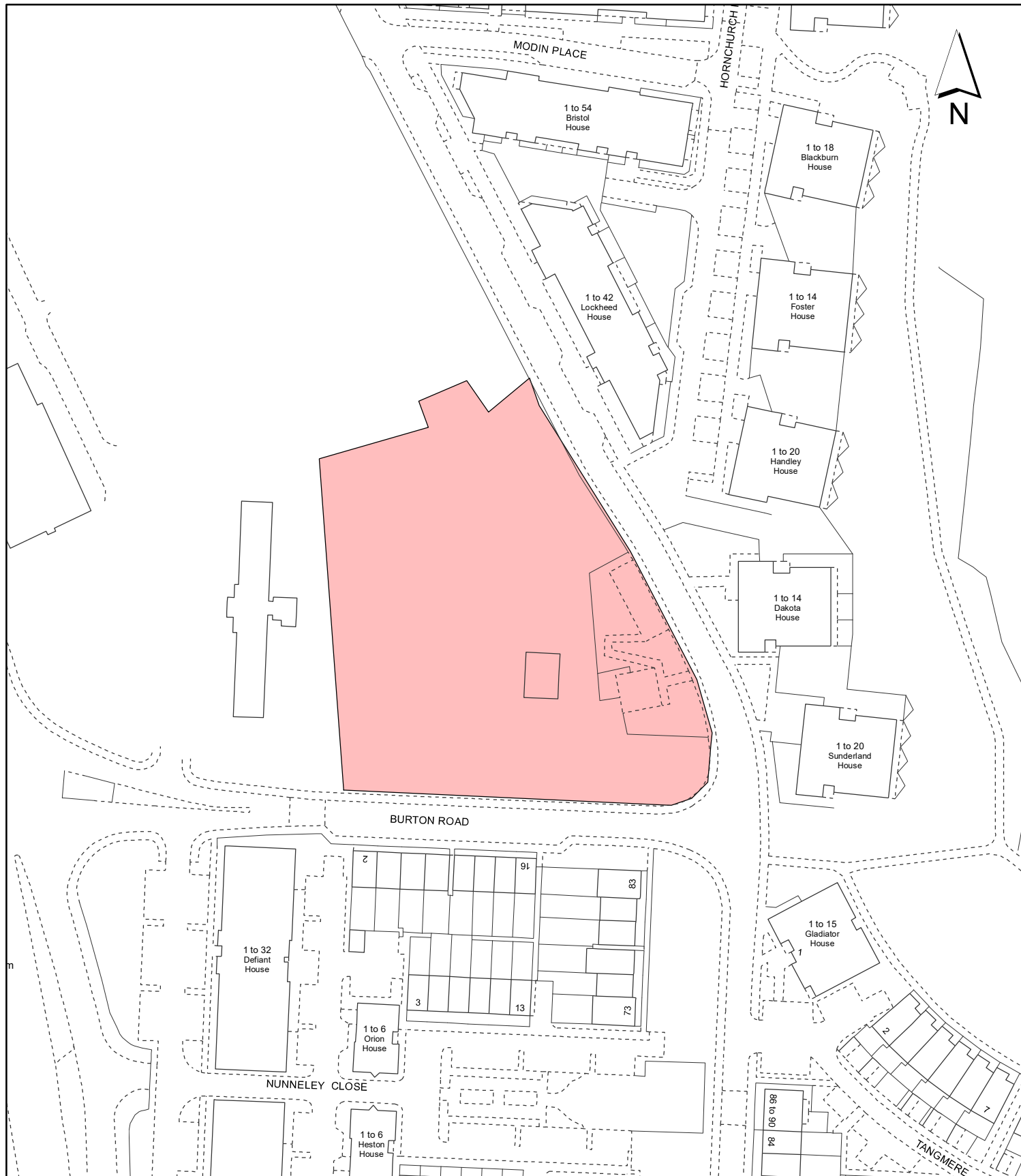
As such the application is recommended for approval.

11. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
The London Plan (March 2021)
National Planning Policy Framework (NPPF) (July 2021)
National Planning Practice Guidance (NPPG)

Contact Officer: Ed Laughton

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.

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Site Address:

Land East of Mons

Planning Application Ref:

585/APP/2022/665

Planning Committee:

Major

Scale:

1:1,250

Date:

February 2023

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

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



HILLINGDON
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