

Report of the Head of Development Management and Building Control Committee Report

Case Officer: Rhian Thomas	23589/APP/2025/3164
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Date Application Valid:	24-03-26	Statutory / Agreed Determination Deadline:	21-07-26
Application Type:	Full	Ward:	Hayes Town

Applicant: **Paul Adams**

Site Address: **Hayes Hawks BMX Track, Lake Farm Country park, Dawley Road, Hayes, UB3 1EJ.**

Proposal: **Erection of new floodlighting to the perimeter of the existing BMX Track.**

Summary of Recommendation: **GRANT planning permission subject to conditions**

Reason Reported to Committee: **Required under Part 6 of the Planning Scheme of Delegation (the Council is the Applicant)**



Summary of Recommendation:

GRANT planning permission subject to the conditions set out in Appendix 1.

1 Executive Summary

- 1.1 The application seeks full planning permission for the installation of 6 no. 15m high floodlighting columns around the existing BMX track at Lake Farm Country Park, Hayes. The proposal is intended to support the continued and extended use of this established recreational facility, particularly during evening periods and the winter months.
- 1.2 The key planning considerations relate to the principle of development, impact on the Green Belt, design and visual impact, residential amenity, highways, ecology and biodiversity, as well as technical matters including flooding, contaminated land and other environmental considerations.
- 1.3 The proposal is considered acceptable in principle as an enhancement to an existing community recreational facility and is supported by national, regional and local planning policy. It is not inappropriate development within the Green Belt, would preserve openness, and would not give rise to unacceptable impacts in respect of character and appearance, neighbouring amenity, highway safety, or environmental factors.
- 1.4 Due regard has been given to all material planning considerations and the submitted supporting information. It is concluded that the proposal complies with the Development Plan, and no material considerations indicate that a contrary decision should be taken. The planning application is therefore recommended for approval subject to the conditions set out in Appendix 1.

2 The Site and Locality

- 2.1 The application site relates to an existing BMX track located within Lake Farm Country Park, Hayes. The site forms part of a large area of public open space characterised by grassland, recreational uses and associated infrastructure, including a skate park and ancillary structures connected to the BMX facility.
- 2.2 The site is located within the Metropolitan Green Belt. A small portion of the site is identified as being at risk of surface water flooding. The site is also located within the Hillingdon Air Quality Management Area (AQMA) and within the defined buffer zone of a landfill site

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- 2.3 The character of the surrounding area is defined by open space, with residential properties located at a significant distance from the BMX track along Dawley Road and surrounding streets.

Figure 1: Location Plan (application site edged red)



Figure 2: Street View Image of the Application Site



3 Proposal

- 3.1 Planning permission is sought for the installation of 6 x 15 metre floodlights to the perimeter of the existing BMX Track.

Figure 3: Proposed Flood Light Arrangement (please note – larger version of plan can be found in the Committee Plan Pack)

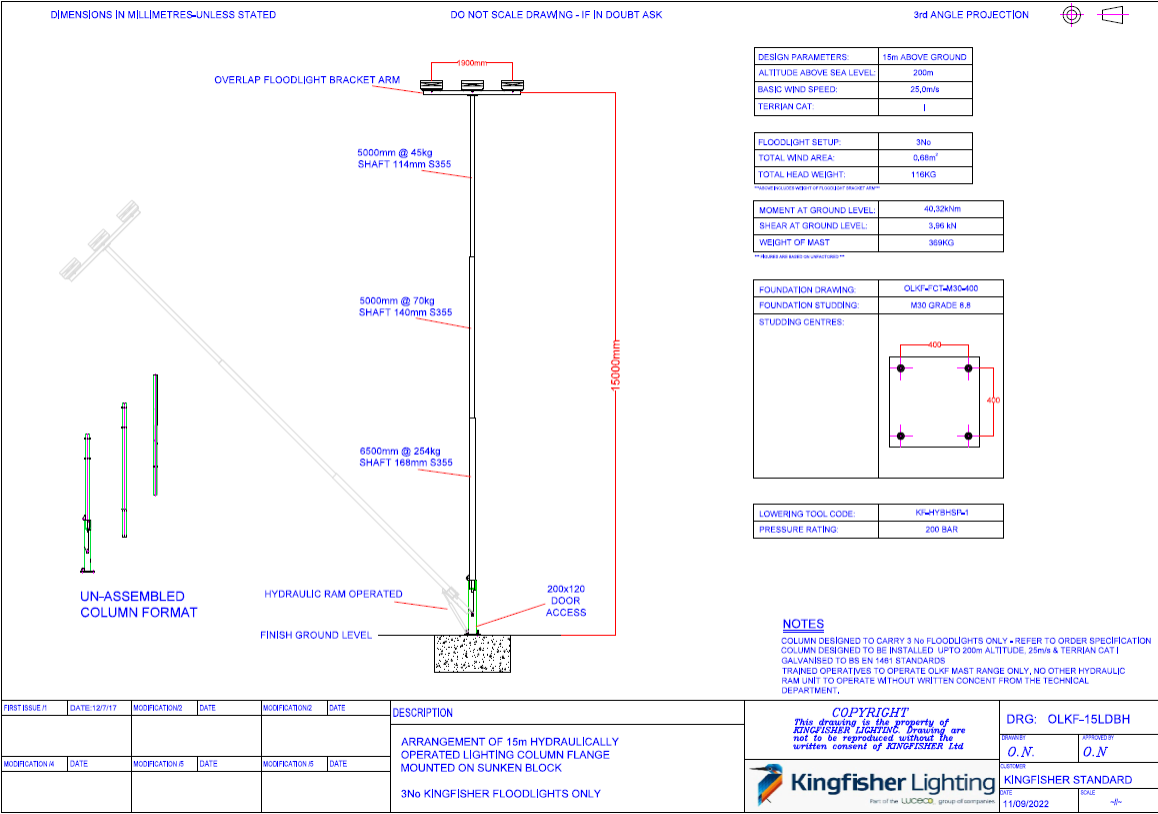


Figure 4: Proposed Scale Plan (height of pole)

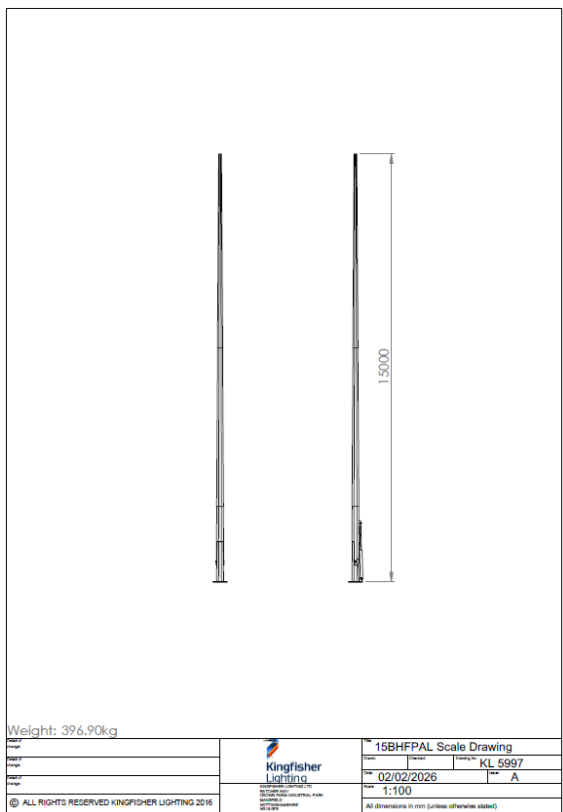


Figure 5: Proposed Layout and Lighting Plan

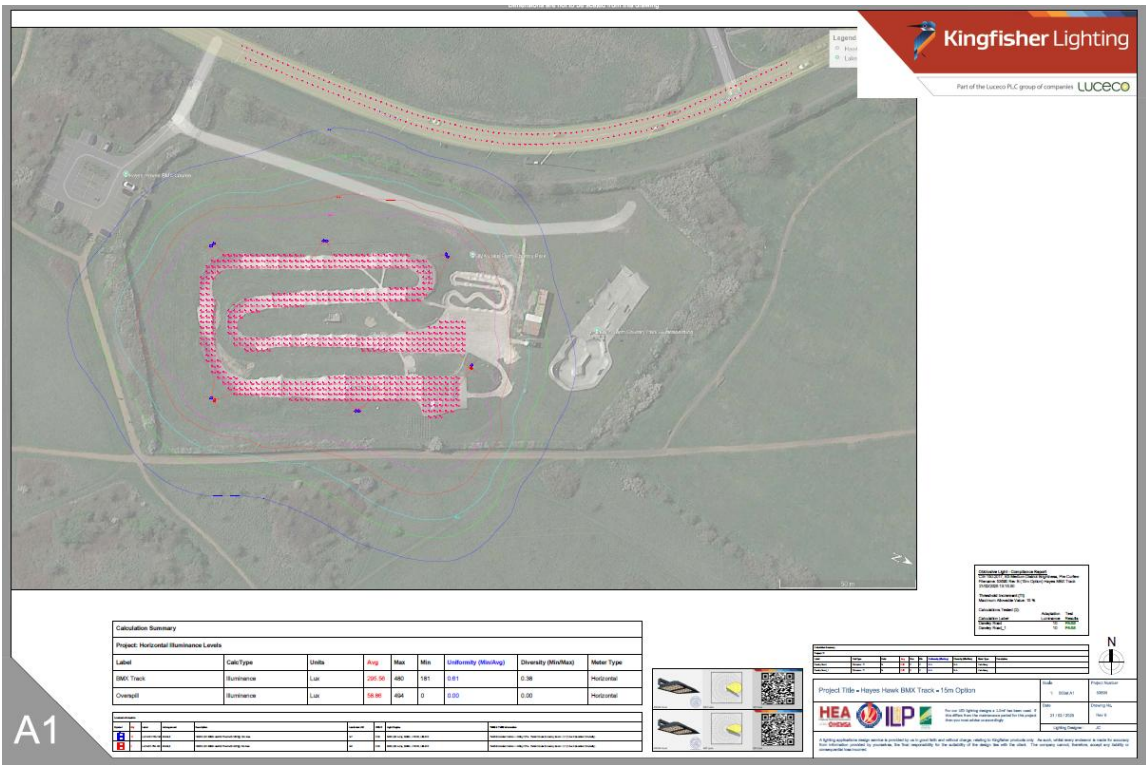
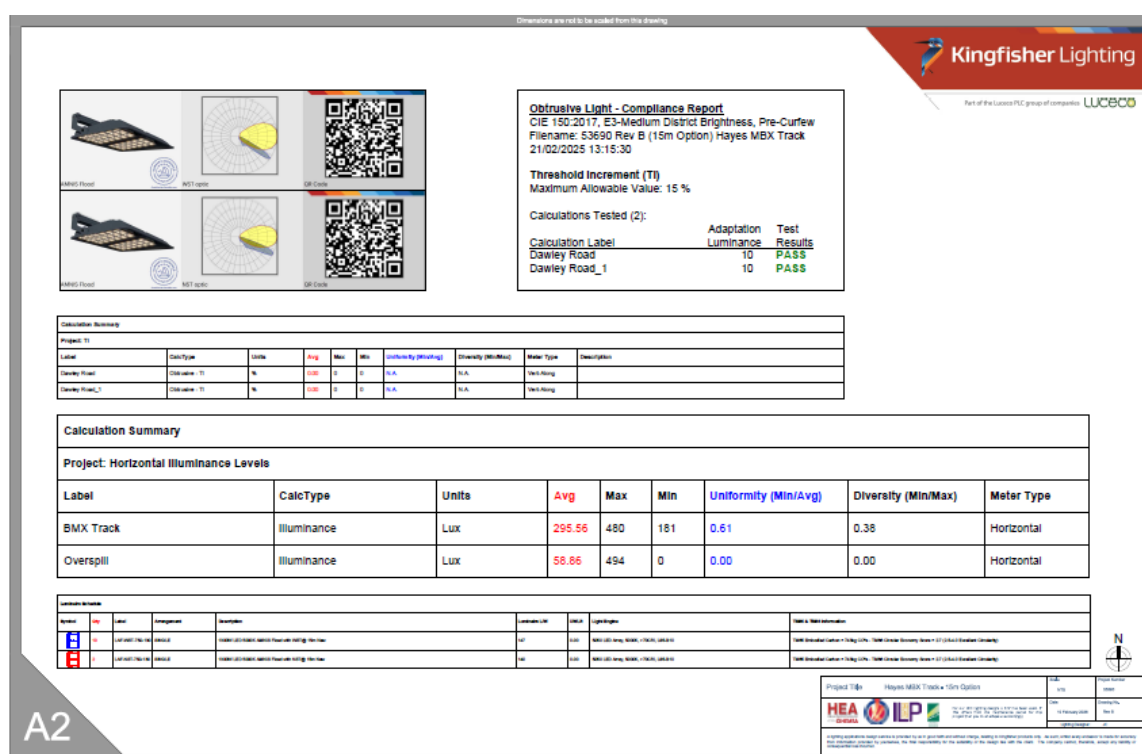


Figure 6: Proposed lighting plan



4 Relevant Planning History

A list of the relevant planning history related to the property can be found in Appendix 2.

5 Planning Policy

- 5.1 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

6 Consultations and Representations

- 6.1 Four neighbouring properties were consulted on the application by letter dated 25-03-26. The consultation period expired 17-04-26.
- 6.2 A site notice was displayed 26-03-26 and expired 19-04-26. A press advertisement was also displayed on 15-04-26 and expired 07-05-26.
- 6.4 No public representations have been received.
- 6.5 Consultee responses received are summarised in Table 1 (below). Full copies of the responses have also separately been made available to Members.

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Table 1: Summary of Consultee Responses

Consultee and Summary of Comments	Planning Officer Response
Contaminated Land Officer No objection in relation to the application on land contamination, subject to land contamination informative.	This is noted and the relevant informative note added.
Highway Authority No objection, subject to a condition to ensure lighting is shielded to prevent glare or light spillage onto the adjacent public highway.	This is noted and a compliance condition has been added to ensure the lighting is carried out in accordance with the submitted details.

7 Planning Assessment

Principle of Development

- 7.1 The application seeks full planning permission for the installation of floodlighting around the existing BMX track at Lake Farm Country Park, Hayes. The proposal comprises 6 x 15m raise-and-lower lighting columns fitted with LED luminaires positioned around the perimeter of the established track.
- 7.2 The BMX track is a long-standing use within the park, leased from the Council and operated by a community sports club. The proposal does not involve a change of use or loss of open space, but instead represents ancillary development to support and enhance an existing recreational use
- 7.3 At a national level, the NPPF (2024) supports the retention and enhancement of sports and recreational facilities. Paragraph 96 encourages planning decisions that enable and support healthy lifestyles, including through access to high quality open space and opportunities for sport and recreation. Paragraph 103 also supports the protection and continued use of existing sports facilities. The proposed lighting would enable safe, extended use of the track during evenings and winter months, increasing accessibility and community participation.
- 7.4 At the strategic level, the London Plan (2021) supports improvements to social infrastructure. Policy S1 (Developing London's social infrastructure) seeks to ensure infrastructure meets community needs, while Policy S5 (Sports and recreation facilities) supports the retention and enhancement of existing sports facilities. The proposal would improve the usability of an established facility and increase its availability to the local community.

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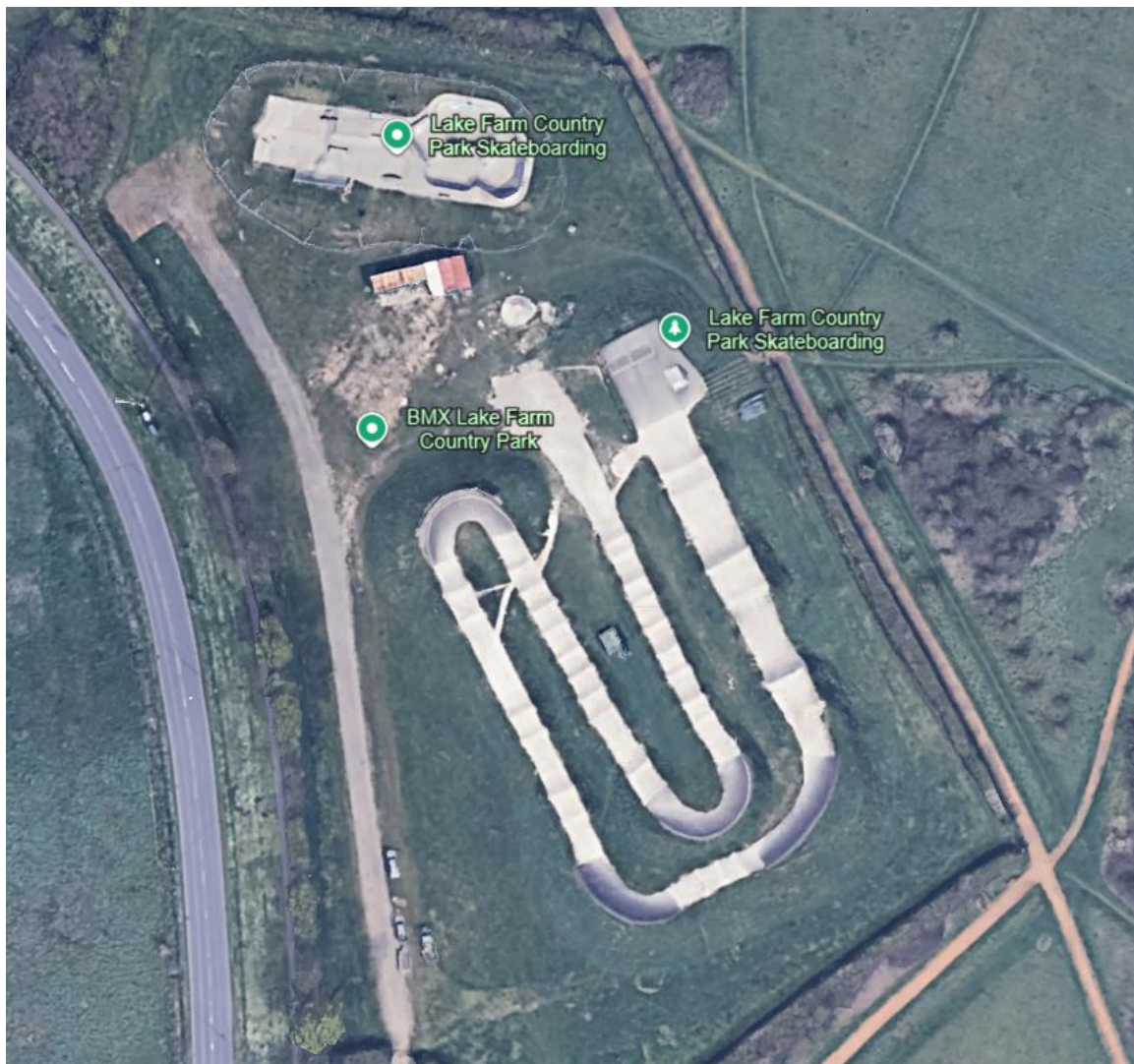
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- 7.5 At local level, the proposal accords with Policies DMCI 1 and DMCI 2 of the Hillingdon Local Plan Part 2 (2020). Policy DMCI 1 (Infrastructure Provision) supports the provision and enhancement of community infrastructure, while Policy DMCI 2 (Open Space, Sport and Recreation) supports improvements to existing recreational facilities and resists their loss. The proposal would not result in any loss of open space and instead represents an enhancement to an established sporting use.
- 7.6 Accordingly, the development is considered to represent a proportionate enhancement to an existing community facility and is acceptable in principle, subject to other material planning considerations.

Design / Impact on the Character and Appearance of the Area

- 7.7 The application proposes the installation of 6 no. 15m high floodlighting columns positioned around the perimeter of the existing BMX track within Lake Farm Country Park. The columns are of a simple, functional design and incorporate modern LED luminaires designed to direct light downwards onto the track.
- 7.8 The site forms part of a large area of open space characterised by expansive grassland, recreational uses and associated infrastructure. The BMX track itself, along with other features such as the adjacent skate park and ancillary equipment, already introduces elements of built form and activity within this part of the park. In this context, the proposed lighting columns would read as ancillary features associated with an established sporting use, rather than incongruous structures.

Figure 7: Areal Image of Site (Search Google Earth)



- 7.9 Whilst the columns would have a height of 15m, their slender profile and limited number (6 in total) would ensure that they do not appear overly dominant or visually intrusive within the wider open landscape. The spacing of the columns around the track, together with the presence of surrounding vegetation and existing recreational infrastructure, would further reduce their visual prominence. The development would therefore not result in an overbearing form of development or materially detract from the open character of the park.

Figure 8: View of the site from southeast corner



Figure 9: View of site from northwest corner



Figure 10: View of centre of the site



- 7.10 In policy terms, the proposal accords with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020), which seeks to ensure that new development is appropriately designed and respects the character and appearance of the surrounding area. Similarly, Policy D3 of the London Plan (2021) requires development to respond positively to its context and be of a high-quality design, while Policy D8 supports the provision of well-designed public realm and recreational spaces.
- 7.11 Taking these considerations into account, the proposed floodlighting is appropriately sited, of an appropriate scale and designed such that it would not result in harm to the character and appearance of the area. The development is therefore compliant with the above policy framework.

Impact on the Green Belt

- 7.12 Paragraph 153 of the NPPF (2024) states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. '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.

- 7.13 Paragraph 154 of the NPPF (2024) goes on to state that development in the Green Belt is inappropriate unless one of a number of exceptions applies, including the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport and recreation, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 7.14 At the regional level, London Plan (2021) Policy G2 (London's Green Belt) confirms that the Green Belt should be afforded the strongest protection and that inappropriate development should be refused except in very special circumstances, in line with national policy.
- 7.15 At the local level, Policy EM2 of the Hillingdon Local Plan Part 1 and Policy DME1 4 of the Hillingdon Local Plan Part 2 (2020) seek to protect the openness and permanence of the Green Belt, resisting inappropriate development unless it falls within an identified exception or very special circumstances are demonstrated.
- 7.16 The proposed development comprises the installation of 6 no. 15m high floodlighting columns to serve an existing BMX track, which is an outdoor sports facility within a public park setting. The lighting is directly related to, and functionally necessary for, the continued and enhanced use of the track, particularly during evenings and winter months when daylight is limited. The proposal is therefore considered to represent an appropriate ancillary facility to support outdoor sport.
- 7.17 In assessing whether the development satisfies the requirements of Paragraph 154(b), regard must be had to its impact on the openness of the Green Belt, which has both spatial and visual dimensions.
- 7.18 In spatial terms, the development would result in a negligible impact on openness, as the proposal does not involve the erection of buildings or substantial structures that would enclose or occupy significant space. The lighting columns have a limited physical footprint and are distributed around the perimeter of the existing track, which is already in active recreational use.
- 7.19 In visual terms, it is acknowledged that the columns would have a height of 15 metres and would be visible within the surrounding open landscape. However, the structures are of a slender, utilitarian design and limited in number (6 in total), ensuring that they do not appear unduly prominent or overbearing when viewed within the context of a large and active recreational space. The siting of the columns adjacent to an existing BMX facility, together with surrounding vegetation and established recreational features, ensures that they are read as part of the existing sporting infrastructure rather than as isolated or intrusive elements within the wider Green Belt. Furthermore, the lighting units are designed to be directional and used only during defined hours, thereby limiting wider visual effects and avoiding unnecessary light spill into the surrounding Green Belt.

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- 7.20 Having regard to the above, it is considered that the proposal would preserve the openness of the Green Belt and would not conflict with the purposes of including land within it, particularly given that the site would remain in its established use for outdoor recreation and would continue to contribute to the openness and function of the wider Green Belt.
- 7.21 Accordingly, the development is considered to fall within the exception set out in Paragraph 154(b) of the NPPF (2024) and is therefore not inappropriate development in the Green Belt. As such there would not be a requirement for the applicant to demonstrate very special circumstances in justifying the development.

Residential Amenity

- 7.22 Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020) seeks to ensure that development does not adversely impact the amenity of neighbouring occupiers by reason of, among other matters, dominance, visual intrusion, noise, light pollution or other disturbance.
- 7.23 The application site is located within Lake Farm Country Park and is well separated from surrounding residential properties. The nearest residential properties along Dawley Road are approximately 290 metres from the site, whilst properties along Botwell Common Road are approximately 258 metres away. In addition, Lake Farm Park Academy is located approximately 330 metres from the site. These separation distances are substantial and provide a significant buffer between the development and any sensitive receptors.
- 7.24 The proposed development comprises the installation of 6 no. 15m floodlighting columns around an existing BMX track. In terms of their physical presence, the columns would be located within an established recreational area and, given the distances involved, would not give rise to any overbearing impact, loss of outlook, loss of light or sense of enclosure for neighbouring occupiers.
- 7.25 The submitted lighting specification confirms that the proposed luminaires are designed with strong directional control, with fittings angled downwards towards the track to minimise upward light spill. The scheme utilises specialist sports lighting equipment with beam control to ensure that illumination is contained within the site. The supporting lighting assessment demonstrates compliance with recognised standards for obtrusive light (CIE 150:2017), with testing confirming no unacceptable glare or light spill towards surrounding receptors or the adjacent highway. These measures ensure that the proposed lighting would not result in significant light intrusion or glare.
- 7.26 Furthermore, the lighting would only be used during defined operational hours associated with training sessions and would be switched off when not in use, thereby limiting the duration of any illumination. Should the application be determined for approval, a condition is recommended restricting the hours the floodlighting can be used to 9:30pm.

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- 7.27 In terms of noise and activity, whilst the provision of lighting would allow for use of the BMX track during darker periods, particularly in winter months, the site would continue to operate as an established recreational facility. Given the significant separation distances to the nearest residential properties, it is not considered that the proposal would result in any material increase in noise or disturbance that would harm neighbouring amenity.
- 7.28 Overall, having regard to the siting of the development, the substantial distances to neighbouring properties, and the controlled lighting design, the proposal would not result in unacceptable harm to the amenity of neighbouring occupiers. The development is therefore considered to comply with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

Highways and Parking

- 7.29 Policy DMT 2 (Highway Impacts) of the Hillingdon Local Plan Part 2 (2020) seeks to ensure that development would not have an unacceptable impact on highway safety or the efficient operation of the highway network.
- 7.30 Policy DMT 5 (Pedestrians and Cyclists) supports proposals that do not prejudice the safety of non-motorised users.
- 7.31 At a strategic level, Policy T2 (Healthy Streets) of the London Plan (2021) requires development to ensure safe and efficient movement of people and vehicles, including avoiding impacts that could compromise highway safety.
- 7.32 Paragraph 116 of the NPPF (2024) similarly requires that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe.
- 7.33 The application relates solely to the installation of floodlighting to an existing BMX track and does not involve any alterations to access arrangements, parking provision or the overall use of the site. As such, the proposal is not expected to materially increase trip generation or place additional demand on the highway network.
- 7.34 The Council's Highway Authority has reviewed the submitted details, and it is noted that the luminaires are angled downwards with strong directional control, and the columns are positioned such that they do not align with the adjacent highway. The submitted modelling demonstrates that there would be no direct glare or light spill affecting the highway, and no adverse impact on driver visibility.
- 7.35 The Highway Authority is satisfied that the proposal would not give rise to glare or distraction to road users and would not adversely affect highway safety or the operation of the network during evening hours. Furthermore, given that the proposal does not intensify the use of the site beyond its existing lawful use, no material increase in traffic generation is anticipated.

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- 7.36 Accordingly, the Highway Authority has raised no objection to the proposal, subject to a condition requiring the lighting to be installed and operated in accordance with the approved details and to prevent glare or light spill onto the highway.
- 7.37 Having regard to the above, the proposal is considered acceptable in highways terms and compliant with Policies DMT 2 and DMT 5 of the Hillingdon Local Plan Part 2 (2020), Policy T2 of the London Plan (2021), and the relevant provisions of the NPPF (2024).

Noise

- 7.38 Policy D14 of the London Plan (2021) seeks to ensure that development does not result in unacceptable noise impacts on surrounding land uses.
- 7.39 The proposal relates to the installation of floodlighting to an existing BMX track and does not introduce any new noise-generating equipment. Whilst the provision of lighting would enable the continued use of the facility during darker hours, particularly in winter months, the use of the site for recreational purposes is already well established.
- 7.40 The site is located within a large area of open space and is separated from the nearest residential properties, such that any noise associated with the use of the BMX track would dissipate over distance. The proposal is not expected to materially increase the intensity or frequency of use beyond its existing operation, and any activity would remain consistent with the established use of the site.
- 7.41 Furthermore, the use of the lighting would be limited to defined hours, which can be controlled by condition, ensuring that activity does not extend to late night periods.
- 7.42 Having regard to the above, the proposal is not expected to give rise to unacceptable noise impacts and is considered to comply with Policy D14 of the London Plan (2021).

Air Quality

- 7.43 The site is located within the Hillingdon Air Quality Management Area (AQMA), where development is expected to minimise emissions and avoid adverse impacts on local air quality.
- 7.44 The proposal relates solely to the installation of floodlighting to an existing BMX track. The development would not materially increase traffic generation or introduce combustion sources and therefore would not result in any measurable impact on local air quality.

Accessibility

- 7.45 Policy D5 of the London Plan (2021) (Inclusive Design) seeks to ensure that development is designed to be inclusive and accessible to all users. The proposal does not involve any alterations to the layout, access arrangements or usability of the existing facility. As such, it would not prejudice inclusive access to the site, and the BMX track would remain accessible to all users in the same manner as existing. The development is therefore considered to comply with Policy D5 of the London Plan (2021).

Trees and Landscaping

- 7.46 Policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) seeks to ensure that development protects and enhances existing trees, hedgerows and landscaping features.
- 7.47 The proposed development involves the installation of 6 no. floodlighting columns positioned around the existing BMX track. The columns would be sited within areas of existing soft landscaping (grass) associated with the established recreational use of the site.
- 7.48 The proposal would not result in the removal of any trees or significant vegetation. The lighting columns would be supported by small-scale foundations with a limited physical footprint, and as such would not result in any material harm to the surrounding landscaped environment.
- 7.49 It is acknowledged that some minor ground disturbance would be required to facilitate the installation of the columns and associated foundations. However, this would be localised and temporary in nature and can be appropriately controlled through the use of planning conditions requiring the reinstatement of any disturbed land to its existing condition following completion of the works. In addition, a condition can secure the removal of the floodlighting and restoration of the land should the structures become redundant in the future.
- 7.50 Given the nature and scale of the proposal, and its siting within an established area of managed open space, it is considered that the development would not adversely impact existing landscaping features or the wider green setting of the park. The development would therefore comply with Policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020).

Ecology

- 7.51 A Preliminary Ecological Appraisal (PEA) has been submitted in support of the application, based on a site survey undertaken in October 2025.
- 7.52 The site comprises managed grassland, hardstanding associated with the BMX track, and boundary hedgerows, which form part of a wider green corridor within Lake Farm Country Park. These habitats are considered common and of low intrinsic ecological value, although they provide some opportunities for wildlife.

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- 7.53 The assessment confirms that there are no statutory ecological designations within 2km of the site, and no evidence of protected species being present on the site that would be directly affected by the proposal.
- 7.54 The site and surrounding parkland may provide commuting and foraging habitat for bats, particularly along boundary hedgerows, and may also support species such as breeding birds, reptiles and hedgehogs. However, the report concludes that the proposed development would not result in significant impacts on these species, given the limited scale of works and the absence of habitat loss.
- 7.55 In relation to the proposed lighting, the PEA identifies a potential for minor disturbance to bats but concludes that impacts would be limited due to the seasonal and restricted use of the floodlighting, with most usage occurring during winter months when bat activity is low. Furthermore, the lighting design and specification is intended to limit light wider spillage beyond the site, thereby limiting wider ecological impact.
- 7.56 Overall, the PEA concludes that the development would not give rise to significant ecological harm, subject to the implementation of standard good practice measures during construction. Officers therefore consider that the development would comply with Policy DMEI 7 of the Hillingdon Local Plan Part 2 and Policy G6 of the London Plan 2021.

Biodiversity Net Gain

- 7.57 Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity. In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 7.58 Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.
- 7.59 In this instance, the proposal is considered to fall within the de minimis exemption, as the development would result in only a very small-scale loss of non-priority habitat associated with limited ground works for the installation of lighting columns. The submitted Preliminary Ecological Appraisal confirms that the proposal would not result in any significant habitat loss and therefore a requirement to deliver 10% biodiversity net gain would not be triggered.

Flooding and Drainage

- 7.60 The application site is not located within Flood Zone 2 or Flood Zone 3, and is therefore at low risk of fluvial flooding. Whilst a small part of the wider site lies within an area identified as being at risk of surface water flooding, the proposed floodlighting columns are not positioned within this area.
- 7.61 The proposal relates to the installation of lighting columns only and would not introduce significant areas of hardstanding or alter existing ground levels. As such, the development would not affect surface water drainage patterns or increase flood risk on or off site. Accordingly, the proposal is considered acceptable in flood risk and drainage terms.

Land Contamination

- 7.62 The application is supported by a Phase II Contamination and Geotechnical Assessment (Land Science Ltd, November 2025). The investigation comprised intrusive ground works including boreholes and laboratory testing of soil samples across the site.
- 7.63 The assessment found:
- No evidence of significant contamination within the soils, with no visual or olfactory indicators recorded during site investigation.
 - Laboratory analysis confirmed that contaminant concentrations do not exceed relevant human health or environmental screening levels, and no significant risks to end users or controlled waters have been identified.
 - No ground gas risks or radon issues were identified, and no specific gas protection measures are required.
 - All soils were classified as non-hazardous, with materials suitable for reuse on site or disposal as inert waste.
- 7.64 The report concludes that no remediation measures are necessary and that the site is suitable for the proposed development.
- 7.65 The Council's Contaminated Land Officer has reviewed the submitted information and raises no objection to the proposal. However, given the site's proximity to a landfill buffer area, an informative is recommended to ensure appropriate construction techniques are employed to minimise potential ground gas ingress during any groundworks.
- 7.66 Having regard to the above, the proposal would be acceptable where assessed in relation to Policies DMEI 11 and DMEI 12 of the Local Plan Part 2, subject to the recommended informative.

8 Other Matters

Human Rights

- 8.1 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equality

- 8.2 Due consideration has been given to Section 149 of the Equality Act with regard to the Public Sector Equality Duty in the assessment of this planning application. No adverse equality impacts are considered to arise from the proposal.

Local Finance Considerations and CIL

- 8.3 Not applicable as the proposed development is not CIL liable.

9 Conclusion / Planning Balance

- 9.1 The proposal seeks to enhance an existing BMX facility within Lake Farm Country Park through the provision of floodlighting, enabling its continued and extended use during evenings and winter months. The development is supported in principle by national, London Plan and local planning policies which seek to promote participation in sport and the provision and enhancement of community infrastructure.
- 9.2 The proposal has been carefully assessed against all relevant material considerations. It is considered acceptable in Green Belt terms, falling within the exception set out in Paragraph 154(b) of the NPPF (2024), and would preserve the openness and function of the Green Belt. Furthermore, the development would not result in harm to the character and appearance of the area, nor would it give rise to unacceptable impacts on neighbouring amenity, highway safety, ecology, or other environmental considerations.
- 9.3 Overall, the proposal represents a proportionate and appropriate enhancement to an established recreational use, providing community benefits without giving rise to material harm.
- 9.4 The proposal is considered to comply with the Development Plan and no material considerations indicate that a contrary decision should be taken. Consequently, the application is recommended for approval subject to the conditions set out in Appendix 1 (below).

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10 Background Papers

- 10.1 Relevant published policies and documents taken into account in respect of this application are set out in the report. Documents associated with the application (except exempt or confidential information) are available on the [Council's website here](#), by entering the planning application number at the top of this report and using the search facility. Planning applications are also available to inspect electronically at the Civic Centre, High Street, Uxbridge, UB8 1UW upon appointment, by contacting Planning Services at planning@hillingsdon.gov.uk.