



**HILLINGDON**  
LONDON

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Date: 20th September 2019  
Our Ref: 4266/PRC/2019/144

Dear GI Hearn

**RE: Redevelopment of site to provide residential-led mixed-use scheme of circa 515 units, flexible commercial/community uses accompanying landscaping, car and cycle parking and open space.**

**SITE: Former Master Brewer Site Freezeland Way Hillingdon**

I refer to your request for pre-application planning advice dated 08-07-19 and our subsequent meetings on 12-08-19 and 19-09-19 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: Pre App Brochure 01685\_Pre App\_190725\_S received 12-08-19 - received 12 Aug 2019  
TFL PRE-APPLICATION NOTE dated July 2019 - received 09 Aug 2019  
Supporting Summary Structural Technical Note - received 09 Aug 2019  
Technical Note - ARBORICULTURAL IMPACT ASSESSMENT - received 09 Aug 2019  
Technical Note -TOWNSCAPE AND VISUAL IMPACT ASSESSMENT - received 09 Aug 2019  
BMD.19.020.RP.001 TVIA - Appendix A - Methodology - received 09 Aug 2019  
BMD.19.020.TVIA TN Appendix B - received 09 Aug 2019  
Briefing Note - Scope of Application - received 09 Aug 2019  
Briefing Note - Scope of Application - received 09 Aug 2019  
Proposed Energy Strategy and Sustainability Requirements - received 09 Aug 2019

**Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.**

**The Site and Surrounds**

The application site area measures 2.48ha and comprises land formerly occupied by the Master Brewer Hotel, a public house/motel with 106 bedrooms, conferencing and restaurant facilities and 200 parking spaces.

The site falls within the North Hillingdon Local Centre. Currently the former Master Brewer site comprises hard standing. The semi mature vegetation within the site has recently been cleared. Large advertising boards are located on the boundary adjacent to Long Lane. Semi mature and mature boundary planting envelope the site on each of its boundaries. Vehicular access to the site is provided via an entrance/exit point onto Freezeland Way, with an additional exit point available on Long Lane, both of which have been blocked with temporary concrete bollards and fencing.

The site is broadly flat but inclines at its boundary adjacent to Long Lane (approximately 2.5 metres) and declines to the embankment adjacent to the A40 (approximately 3 metres). Following demolition of the former Master Brewer Hotel and associated buildings, the site is currently derelict and awaiting redevelopment.

The wider built environment is characterised by predominantly 2/3 storey detached and semi detached residential and commercial properties. Immediately to the west of the site is Long Lane/A437, beyond which is a vacant site which lies adjacent to Hillingdon Station and benefits from planning permission for a 5 storey office development measuring 11,574 sq.m and 289 car parking spaces. This permission has been partially implemented by the construction of a roundabout and associated access.

To the south of the site is Freezeland Way and beyond this, the North Hillingdon Local Centre. Green Belt land is located to the east of the site. To the north beyond the A40 there is also an extensive area of Green Belt and this area includes the setting of some important historic sites, such as Ickenham Manor and Swakeleys House. These areas are sensitive in terms of views to and from the site. The wider built environment is characterised by predominantly 2/3 storey detached and semi detached residential and commercial properties.

The site is approximately 200 metres east of Hillingdon London Underground Station. This station is adjacent to TfL bus routes and coach stops which provide services to Uxbridge, Oxford and Ickenham. The site has a Public Transport Accessibility Level of 3 (PTAL).

The site has an extensive planning history going back many years. The applications most relevant to the site are listed below.

The following applications submitted on 12-06-12 were refused on 10/12/13:

- A full application ref: 4266/APP/2012/1544 for the mixed use commercial development
- Outline Planning application ref: 4266/APP/2012/1545 for the erection of 5 part 4, part 5 storey blocks to provide 125 residential units.

The following applications were approved by the Council's Major Applications Planning Committee, subject to the completion of a S106 Agreement. The S106 Agreement has not yet been signed and decision notices have therefore not been issued.

- Application ref: 4266/APP/2014/518

Mixed use redevelopment comprising the erection of a foodstore, measuring 3,543 sq.m (GIA) (Use Class A1) (inclusive of delivery and back of house areas) with 179 car parking spaces and 32 cycle spaces; 3 retail units totaling 1,037 sq.m (GIA) (Use Class A1 to A5); a 6 storey (plus plant level) 70 bed hotel (Use Class C1), with associated car parking and cycle spaces; together with highways alterations and landscape improvements

- Application Ref: 4266/APP/2014/519

Erection of 125 residential units (Use Class C3) with 100 car parking spaces and 138 cycle parking spaces and associated highways alterations together with landscape improvements

(Outline Application with details of appearance reserved).

The following application was refused on 19-02-19.

· Application Ref:4266/APP/2017/3183

Construction of a residential-led, mixed use development comprising buildings between 4 and 9 storeys to provide 437 residential units (Use Class C3); employment floor space (Use Classes B1(a-c)); flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking; and hard and soft landscaping, plant and other associated ancillary development.

## **The Proposal**

The proposal envisages the delivery of approximately 590 residential dwellings (including Council land), or 515 units (excluding Council land), comprising 1, 2 and 3 bedroom flats across 10 blocks with retail and employment floorspace. The proposed buildings will range in height from 2 to 11 storeys. Communal parking spaces and cycle storage are also proposed.

The layout places the majority of the car parking in podium parking areas.

The development will comprise continuous 'L' form block of buildings along the western and northern boundaries ranging between 5 to 11 storeys in height, creating an internal landscaped space in which are located three free standing blocks, ranging between 4 to 7 storeys in height.

The heights of the outer perimeter blocks vary from 5 storey to a single 11 storey building at the north west corner of the site. A 6/8 storey 'entrance' building is located at the south west corner.

It is proposed to provide 46% of the residential units as 1 bedroom apartments, 51% as 2 bedroom and 3% as 3 bedroom flats. However, at the meeting you indicated that this unit mix was subject to change, with the 3 bed units increasing to 15%.

The scheme proposes a parking ratio of 0.3 spaces per dwelling.

At the meeting, it was confirmed that the scheme will not include Council land.

## **Planning Policy**

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon Local Plan: Part 1, Saved Unitary Development Plan policies, the London Plan 2016, the NPPF and supplementary planning guidance prepared by both LB Hillingdon and the GLA.

### **Emerging policy**

With regard to emerging policy, the National Planning Policy Framework (NPPF) (2018) Paragraph 48 states that Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the NPPF.

The Revised Proposed Submission Local Plan Part 2 (LPP2) documents (Development Management Policies, Site Allocations and Designations and Policies Map Atlas of Changes) were submitted to the Secretary of State for examination in May 2018.

The public examination hearing sessions took place over one week in August 2018. Following the public hearing sessions, the examining Inspector advised the Council in a Post Hearing Advice Note sent in November 2018 that he considers the LPP2 to be a plan that could be found sound, subject to a number of main modifications.

The main modifications proposed by the Inspector were agreed by the Leader of the Council and the Cabinet Member for Planning, Transport and Recycling in March 2019 and were published for public consultation from 27 March to 8 May 2019.

Regarding the weight which should be attributed to the emerging LPP2, Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that Local Planning Authorities may give weight to relevant policies in emerging plans according to:

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

With regard to (a) above, the preparation of the LPP2 is now at a very advanced stage. The public hearing element of the examination process has been concluded and the examining Inspector has indicated that there are no fundamental issues with the LPP2 that would make it incapable of being found sound subject to the main modifications referred to above.

With regard to (b) above, those policies which are not subject to any proposed main modifications are considered to have had any objections resolved and can be afforded considerable weight. Policies that are subject to main modifications proposed by the Inspector will be given less than considerable weight. The weight to be attributed to those individual policies shall be considered on a case by case basis considering the particular main modification required by the Inspector and the material considerations of the particular planning application, which shall be reflected in the report, as required.

With regard to (c) it is noted that the Inspector has indicated that subject to main modifications the LPP2 is fundamentally sound and therefore consistent with the relevant policies in the NPPF.

Notwithstanding the above, the starting point for determining planning applications at this time remains the adopted policies in the Local Plan: Part 1 Strategic Policies and the Local Plan: Part 2 Saved UDP Policies 2012.

#### Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.E5 (2012) Town and Local Centres
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM4 (2012) Open Space and Informal Recreation
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.T1 (2012) Accessible Local Destinations

#### Other Policies:

- AM1 Developments which serve or draw upon more than a walking distance

	based catchment area - public transport accessibility and capacity considerations
AM10	Incorporation in new developments of additions to the proposed cycle network
AM11	Improvement in facilities and promotion of safety and security at bus and rail interchanges; use of planning agreements to secure improvement in public transport services
AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - (i) Dial-a-ride and mobility bus services (ii) Shopmobility schemes (iii) Convenient parking spaces (iv) Design of road, footway, parking and pedestrian and street furniture schemes
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM3	Proposals for new roads or widening of existing roads
AM7	Consideration of traffic generated by proposed developments.
AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE13	New development must harmonise with the existing street scene.
BE18	Design considerations - pedestrian security and safety
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE26	Town centres - design, layout and landscaping of new buildings
BE28	Shop fronts - design and materials
BE29	Advertisement displays on business premises
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE36	Proposals for high buildings/structures in identified sensitive areas
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE39	Protection of trees and woodland - tree preservation orders
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
H4	Mix of housing units
H5	Dwellings suitable for large families
LE6	Major officer and other business proposals in town centres
OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures

OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OL5	Development proposals adjacent to the Green Belt
PR23	Hillingdon Circus
R1	Development proposals in or near areas deficient in recreational open space
R16	Accessibility for elderly people, people with disabilities, women and children
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
R2	Provision of recreation, entertainment and leisure facilities in Town Centres
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
DME 2	Employment Uses Outside of Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
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
DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
DMTC 3	Maintaining the Viability of Local Centres and Local Parades
LPP 2.15	(2016) Town Centres
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.11	(2016) Affordable housing targets
LPP 3.12	(2016) Negotiating affordable housing on individual private residential and mixed-use schemes

- LPP 3.13 (2016) Affordable housing thresholds
- LPP 3.3 (2016) Increasing housing supply
- LPP 3.4 (2015) Optimising housing potential
- LPP 3.5 (2016) Quality and design of housing developments
- LPP 3.6 (2016) Children and young people's play and informal recreation facilities
- LPP 3.7 (2016) Large residential developments
- LPP 3.8 (2016) Housing Choice
- LPP 3.9 (2016) Mixed and Balanced Communities
- LPP 4.12 (2016) Improving opportunities for all
- LPP 5.1 (2016) Climate Change Mitigation
- LPP 5.10 (2016) Urban Greening
- LPP 5.11 (2016) Green roofs and development site environs
- LPP 5.12 (2016) Flood risk management
- LPP 5.13 (2016) Sustainable drainage
- LPP 5.14 (2016) Water quality and wastewater infrastructure
- LPP 5.15 (2016) Water use and supplies
- LPP 5.2 (2016) Minimising Carbon Dioxide Emissions
- LPP 5.7 (2016) Renewable energy
- LPP 6.10 (2016) Walking
- LPP 6.11 (2016) Smoothing Traffic Flow and Tackling Congestion
- LPP 6.13 (2016) Parking
- LPP 6.2 (2016) Providing public transport capacity and safeguarding land for transport
- LPP 6.3 (2016) Assessing effects of development on transport capacity
- LPP 6.4 (2016) Enhancing London's Transport Connectivity
- LPP 6.9 (2016) Cycling
- LPP 7.14 (2016) Improving air quality
- LPP 7.3 (2016) Designing out crime
- LPP 7.4 (2016) Local character
- LPP 7.5 (2016) Public realm
- LPP 7.7 (2016) Location and design of tall and large buildings
- LPP 8.2 (2016) Planning obligations
- LPP 8.3 (2016) Community infrastructure levy
- NPPF- 12 NPPF-12 2018 - Achieving well-designed places
- NPPF- 13 NPPF-13 2018 - Protecting Green Belt land
- NPPF- 14 NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
- NPPF- 15 NPPF-15 2018 - Conserving and enhancing the natural environment
- NPPF- 16 NPPF-16 2018 - Conserving & enhancing the historic environment
- NPPF- 2 NPPF-2 2018 - Achieving sustainable development
- NPPF- 5 NPPF-5 2018 - Delivering a sufficient supply of homes
- NPPF- 7 NPPF-7 2018 - Ensuring the vitality of town centres
- NPPF- 8 NPPF-8 2018 - Promoting healthy and safe communities
- NPPF- 9 NPPF-9 2018 - Promoting sustainable transport

**Main Planning Issues**

## 1. Principle of development

The principle of a mixed-use development use is established through strategic and local level policy. In addition, the Council's Major Planning committee has resolved to grant planning permission for commercial and residential uses on the site, subject to the completion of a S106 Agreement. The Council's emerging Site Allocations DPD, also specifically promotes the redevelopment of the site for a mixed use development, incorporating residential use. It should however be noted that this document has not yet formally been adopted for development control purposes.

The strategic planning context of the site is provided by the NPPF, London Plan (2016) and Local Plan Part 1 Policies E5, H1 and H2. Paragraphs 24 to 27 of the NPPF set out the matters to be considered in the determination of planning applications for main town centre uses, including residential uses. London Plan Policy 3.3 (increasing housing supply) seeks to increase London's housing supply, enhance the environment, improve housing choice and affordability and to provide better accommodation for Londoners.

Local Plan Policy PT1.H1 seeks to ensure the Council meets and exceeds its minimum strategic dwelling requirement and affirms the London Plan targets to deliver 4,250 new homes in the Borough from 2011 to 2021 or 6,375 dwellings up to 2026. The proposal would include up to 515 residential units, which will contribute towards the Council's housing supply as prescribed in the London Plan and emerging local policy.

Policy PT1.E5 (Town and Local Centres) affirms the Council's commitment to improve town and neighbourhood centres across the Borough and improve public transport, walking and cycling connections whilst ensuring an appropriate level of parking is provided. Policy H2 seeks to ensure that housing provision meets the needs of all types of households, maximising the delivery of affordable housing. Subject to appropriate unit mix and tenure, the proposal would be consistent with the aims of these policies.

In addition, Policy H4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) also seeks to encourage additional housing in town centres. Policy H8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) is also relevant, in that it states that a change of use from non-residential to residential will only be permitted if;

- (i) a satisfactory residential environment can be achieved;
- (ii) the existing use is unlikely to meet demand for such
- (iii) the proposal is consistent with the other objectives of the plan.

As detailed in other sections of this letter, the proposal would need to provide an adequate residential environment, particularly given specific site constraints, such as the proximity of the site to a busy road network.

### Commercial Uses

At a more site-specific level, the context is provided by Saved Policy PR23 of the Part 2 - Saved UDP Policies (November 2012). In establishing the principle for the development, PR23 provides a framework for the type of development deemed to be acceptable. The pre application brochure indicates that there will be some form of commercial use. Although the nature of the proposed commercial use on the site has not yet been finalised, should proposals come forward that involve the development of the site for predominantly residential purposes, the Council is likely to accept a proportion of other uses that are appropriate to the 'Local Centre' designation. These could include a hotel, restaurant or small scale retail or business uses. A mixed-use residential-led development, would therefore be considered acceptable, provided issues of scale, density, traffic intensification and impact on the Green Belt are suitably addressed.

National and strategic policy context seeks to promote competitive town centres. The NPPF identifies a need to enhance existing markets and where appropriate, create new ones,



creating conditions where businesses can invest, expand and adapt. In addition, the growth, management and adaptation of town centres to ensure vitality should be positively promoted. This supports the London Plan's approach to assessing and bringing forward additional capacity (Policy 2.15 and Policy 4.7). The proposal supports these objectives.

### Emerging Policy

Whilst there are modifications proposed to emerging Policy SA 14 within the emerging Local Plan Part 2 (Site Allocations and Designations Document), it is not considered that there is an unresolved objection to the principle of inclusion of the site for mixed use redevelopment. As such, it is considered that weight may be given to Policy SA 14. The indicative capacity of this site has increased to 250 units. Ultimately however, the final capacity should be determined by a design-led approach.

Notwithstanding the above policy considerations, planning guidance advocates a mixed-use development on the site which respects the scale and function of the existing Local Centre and the adjoining Green Belt. The type of uses proposed and the quantum of development will therefore be determining issues in terms of the scale and function of the existing Local Centre, the openness and visual amenities of the adjoining Green Belt and impact on the local road network.

Should proposals come forward that involve the development of the site for predominantly residential purposes, with an element of other appropriate town centre uses, emerging Policy SA14 states that the following key principles will need to be considered:

- A range of housing types and tenure will need to be provided on the site, to reflect the conclusions of the Council's latest Housing Market Assessment.
- The key urban design principles should result in the creation of a neighbourhood with clearly defined links to the main shopping area in North Hillingdon, where the scale and massing of buildings reflects local character and the PTAL rating of the site.
- Whilst the nature of the scheme will be predominantly residential, the Council will accept a proportion of other uses that are appropriate to the site's location within the North Hillingdon Local Centre, including a hotel, restaurant and small scale retail.
- Be of a scale that is in keeping with the Local Centre; and
- Form a comprehensive development scheme across the whole site.

It is noted that given the steer provided by policy guidance and the resolutions to approve schemes on the site, the Mayor supports the principle of a residential led mixed-use development of the site.

In conclusion, the re-use of previously developed land in town centres for new housing in a mixed use scheme is considered to be consistent with both national, London Plan and local planning guidance. The principle of the a residential led mixed use scheme therefore meets the policy requirements of the adopted Development Plan, emerging policy and the Council's objectives for the site, subject to issues of appropriate mix of commercial uses, scale, density, traffic intensification, on site parking provision and impact on the Green Belt being suitably addressed.

### Affordable Housing

The London Plan sets the policy framework for affordable housing delivery in London. The London Plan Affordable Housing and Viability Supplementary Planning Guidance (SPG) sets out the Mayor's long-term aim is for half of all new homes to be affordable. Policies 3.10 - 3.13 of the London Plan requires that boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes, having regard to their affordable housing targets.

Emerging Policy DMH 7: (Provision of Affordable Housing) states that

A) In accordance with Policy H1 of the Local Plan Part 1 :

- i) developments with a capacity to provide 10 or more units will be required to maximise the delivery of on-site affordable housing;
- ii) subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split (70% Social/Affordable Rent and 30% Intermediate) as set out in Policy H2: Affordable Housing of the Local Plan Part 1.

B) Affordable housing should be built to the same standards and should share the same level of amenity as private housing.

C) Proposals that do not provide sufficient affordable housing will be resisted.

The application exceeds the threshold of 10 units and above, therefore affordable housing provision by way of a S106 Legal Agreement is required. If less than 35% affordable housing is proposed, any application will need to be supported by a financial viability appraisal (FVA). This will need to be submitted ideally using the Three Dragons Toolkit provided by the Greater London Authority. Financial appraisals will be referred to the Council's specialist consultant for comment. The applicant will be asked to meet the Council's costs prior to any such action. Should the offer reach 35% or above (with an appropriate tenure in line with SPG), a FVA will not be required.

The Council would expect the affordable housing provision to be provided on site and be similar in design to the rest of the site, as well as complying with Housing Quality Indicators (HQI's) and Design and Quality Standards (Housing Corporation). The room sizes must meet minimum standards for affordable housing in Hillingdon.

In terms of tenure, Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default products), and the remaining 40% to be determined by the Local Planning Authority.

Please note that we would like to see 3 bed units bought forward on an affordable rent basis for this scheme. It is likely that the tenure for delivery of any affordable housing units proposed would be sought on an affordable rent basis, as this is the need in this area, with grant funding being available for this type of tenure.

## 2. Design

### DENSITY

The local area is considered to represent an suburban context and has a Public Transport Accessibility Level (PTAL) of 3.

Emerging Policy DMHB 20 17: (Residential Density) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.3, which sets out the following criteria for other town centres with a suburban setting and a PTAL of 2-3: - 80 -100 u/ha or 200 - 250 hr/ha (assuming Ave. 3 hr/unit). Developments will be expected to meet habitable rooms standards.

Policy 3.4 of the London Plan seeks for new developments to achieve the maximum possible density which is compatible with the local context. Table 3.2 of the London Plan recommends that for a PTAL of 3, a density of 150 - 250 hr/ha or between 50-95 u/ha, (assuming 2.7-3.0 hr/u) can be achieved for the application site. For an urban context, Table 3.2 of the London Plan recommends a range of 70 -170 u/ha or 200 - 450 hr/ha.

The site has an area of 2.48 hectares and the proposed density with 515 units is in the region of 207 units/ha. The proposed density therefore exceeds the London Plan recommended density ranges for both a suburban and urban context. The proposed density is also over

twice the recommendations set out in the emerging Local Plan Part 2 Development Management Policies Document.

Given the suburban character of the wider built environment, it will be important to demonstrate that the units will have good internal and external living space, and that the scale and layout of the proposed development is compatible with sustainable residential quality, having regard to the specific constraints of this site.

#### UNIT MIX

Saved UDP Policies H4 and H5 seek to ensure a practicable mix of housing units are provided within residential schemes. Emerging Policy DMH 2: (Housing Mix) 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.

A mixture of 1, 2 and 3 bedroom apartments is proposed. It is noted that 15% of 3 bedroom homes are proposed. However, in a relatively large scale residential development such as this, it would be expected to provide a range of housing types to reflect the conclusions of the Council's latest Housing Market Assessment, including larger units as part of any affordable housing offer. The Housing Market Assessment identifies the need for 3 bedroom units and 2 bedroom units would not be considered to meet these needs. The developer is advised to undertake further work to maximise the provision of family housing on site to support the emerging proposal. The provision of 3 bedroom duplexes may contribute towards meeting this need for family type accommodation, but these would need to be fit for purpose, including to provision of private external amenity areas.

#### CHARACTER AND APPEARANCE

Saved UDP Policies BE13 and BE19 states that the Local Planning Authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area. Policy BE1 of the Local Plan: Part 1 Strategic Policies (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 BE35 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) requires major development adjacent and visible from the A40 to be of a high standard of design.

Policy BE36 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (2012) states that areas sensitive to high buildings or structures will only be permitted if they will not mar the skyline, intrude unacceptably into important local views or interfere with aviation or navigation. This is carried forward in emerging policy DMHB 10: (High Buildings and Structures). This policy states that any proposal for a high buildings and or structures will be required to respond to the local dominant context and satisfy the criteria listed below:

- i) be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings;
- ii) it must be located in an area of high public transport accessibility and be fully accessible for all users
- iii) be of a height, form, massing and scale footprint that is proportionate to its location and sensitive to adjacent buildings and the wider townscape context of its surroundings. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views
- iv) achieve high architectural quality and include design innovation, materials and finishes, lighting and night time impact
- v) where residential uses are proposed, include high quality and useable private and communal amenity space and ensure an innovative approach to the provision of open space
- vi) not adversely impact on the microclimate
- vii) be well managed, provide positive social and economic benefits and contribute to socially

balanced and inclusive communities;

viii) comply with aviation and navigation requirements and not interfere, to an unacceptable degree, with adversely impact upon telecommunication, television and radio transmission networks;

and

ix) demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes

Emerging Policy DMHB 13 11: (Design of New Development) states inter alia that:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest quality standards and, incorporating principles of good design, including:

i) harmonising with the local context by existing street scene and setting taking into account the surrounding:

- scale of development, considering the height, mass and bulk and form of development 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; and local topography, views both from and to the site; and

- natural impact on neighbouring open spaces and their environment 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; and

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

Emerging Policy DMHB 14 12: (Streets and Public Realm) states inter alia that:

A) Development should be well integrated with the surrounding area and should be easily accessible for all people by. It should:

i) improve the legibility and promote routes and wayfinding permeability between the development and civic local amenities;

ii) ensure public realm design takes account of the local characteristics established townscape character and quality of the surrounding area;

iii) include landscaping treatment that is suitable for the location, serves a purpose and, contributes to local green infrastructure, the appearance of the area and ease of movement through the space; and

iv) provide safe and direct pedestrian and cycle movement through the space;

v) incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard;

vi) where appropriate, include the installation of public art; and

vii) delivering proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.

B) Public realm improvements will be sought from developments located close to transport interchanges and community facilities to ensure easy access between different transport modes and into local community facilities.

## LAYOUT

Access to the site is similar to the previous Spenhill mixed use scheme, which has been approved in principle by Committee. The layout is based on continuing the existing Long Lane high street form into the site, leading to an angular offset street line that accesses the site in the form an L-shaped road. This approach to extending the settlement form is supported, as it maintains a good degree of street continuity and creates a potentially well-defined settlement edge.

The continuous built development along the north and west boundaries is intended to provide a barrier against the adverse effects of noise and pollution from Long Lane and the A40, creating an internal landscaped space, in which three free standing blocks are located.

It is acknowledged that there might be merit in the creation of a protective "edge" to the development along the Long Lane and A40 boundaries and to use the built form to screen central open shared amenity area from surrounding traffic noise and intrusion. This can, however also create a "wall like" and visually dominant element and this was considered to be the case in the recently refused scheme.

The ground floor layouts of the edge buildings should be designed to achieve an active street form. Visual and pedestrian connections to the site to North Hillingdon Centre should be reinforced by an appropriately designed building on the south west corner, that emphasises the entrance to the site, with appropriate commercial uses particularly at ground (street) level. The use of duplex units with front doors at ground level and the creation of active frontages across the scheme, including at the base of the south east block would be supported.

The layout of the residential blocks along the eastern boundary with the Green Belt broadly follows the format of the aforementioned schemes approved by Committee. However, it is not clear how the treatment of buildings and spaces along the eastern boundary will integrate both visually or physically with the open space to the east. It will be necessary to ensure that the residential blocks have been sited so that a sufficient gap exists between each building, to provide visual permeability from the Green Belt into the site.

In addition, it is considered important that on the eastern edge of the site, enough space between the site boundary and buildings/gardens is provided, to create a green "transition area" to the open space. This would also provide some space and a setting for the development, rather than relying on off site greenery as a screen. In the current drawings, the lower floors appear to be very close on the boundary and this area looks generally rather cramped.

The scheme proposes to retain the existing woodland buffers, approximately 12.00 metres wide on the north boundary (A40) and on the western boundary. The Long Lane bridge embankment is approximately 13.00 metres and has an approximate 2.5 metre rise to the road edge to the bridge over the A40. This outer edge planting will help to mitigate environmental effects and provide visual screening for the proposed residential development.

However, the embankment land is outside the red line boundary and this limits the option for a street defining built edge. It is noted that the design concept for the west boundary is dependent on the retention and appropriate management of this road side planting. However,

it is not clear if the developer has control over this planted area. Potentially, this area, owned by TfL, could be cleared for highway-related maintenance.

The three blocks within the centre of the site are set within areas of shared open space, which will accommodate an urban square, green street, communal gardens, formal and informal play areas and additional parking. No objections are raised to this design strategy.

It will be important to ensure that adequate connectivity is provided between the parking areas and proposed flats they are intended to serve. Pedestrian permeability should be encouraged and there should be easy access on foot through the perimeter blocks, particularly as some of the residents may not be able to park next to their own blocks. There is also a need to ensure that adequate security is provided to deter crime. As such, a layout that encourages natural surveillance and self policing should be developed.

#### Council Land

At the meeting, it was emphasised by officers that the proposed development should be designed so that it would not prejudice to future development of the Council owned land to the south. As a guide, it was recommended that the free standing blocks be set in a minimum of 10.5 metres from the southern boundary, so that these blocks would not negatively impact on the site delivery through overshadowing, overdominance and privacy thereby constraining site development of Council land. It is noted that the scheme appears to adhere to this strategy.

It is noted that the internal estate road has been aligned such that the 'B' grade oak can be retained on Council land and this is welcomed.

#### SCALE AND APPEARANCE

This is not an historically sensitive site, although its hinterland has a strong "Metroland" suburban character, particularly in terms of its layout, and the scale and massing of the surrounding buildings. The development as proposed is still very urban in character within this largely suburban location, although as an island site, a more densely developed scheme may be appropriate in this location. However, officers remain concerned about the scale and massing of the proposed new development.

The wider impact of the buildings on the town centre and its skyline were carefully considered as part of the 2014 Spenhill schemes, by assessing their visual impact from a number of key viewpoints. Previous Committee resolutions have supported mixed use schemes, which have incorporated well spaced residential blocks of between 4-to 5 storeys in height, the tallest structure being a single "focal point" hotel building of 6 storeys. This was located at and positioned to mark the Hillingdon Circus junction. It was considered that a landmark building of not more than 6 storeys would be appropriate on the south west corner. This is to ensure that any proposed building at this location should fit in with the scale of existing commercial and residential buildings to the south and not to obstruct views to any key focal points.

During the pre application meeting, the Local Planning Authority raised concerns regarding the height and massing of the development and its scale relationship with the existing suburban fabric of North Hillingdon.

The scheme proposes a 315m continuous 'wall' of development along the perimeter to the north and west that wraps around the site from the A40 to Long Lane. This continuous ribbon of development, comprises of the taller buildings of the proposed development, with no 'breaks' in order to maintain the seal against the A40 and Long Lane.

It is noted that the finger form blocks along the northern edge have been connected at the

north end and the upper-level connecting units are 5 storeys, to allow for a varied roof line. The heights of the outer buildings vary from 5 to 8 storeys with a single 11 storey building at the north west corner of the site. A 6/8 storey 'entrance' building is located at the south west corner. The inner courtyard buildings are between 4 to 7 storeys in height.

Notwithstanding the variation of roof heights, it is considered that cumulatively, the outer walls of the development would rise up dramatically above the existing buildings on the south side of Hillingdon Circus to the extent that they would appear completely out of scale and overbearing. The presence of the 11 storey tower block, contributes to a development that would completely overwhelm its immediate surroundings.

The development currently under consideration would break the skyline where at present there are uninterrupted views of Harrow. Its presence would mar the skyline and be intrusive where uninterrupted views are less common and more valued. The size of the development and its unrelieved northern and western facades, positioned relatively close to the site boundary's and relative to the footpath along Long Lane, compounds the scale of the development and the potential harsh canyon like pedestrian environment at ground level.

In effect, due to the juxtaposition in scale between the proposed 4 to 11 storeys and existing 2 to 3 storey suburban context, the proposed development will be considered as a series of tall buildings. Existing and emerging policy and the supporting Townscape Study evidence base has clearly identified areas of Uxbridge and Hayes as the only suitable areas for tall buildings within the Borough. This site is not Uxbridge or Hayes. High buildings and structures are defined as those that are substantially taller than their surroundings, causing a significant change to the skyline. The site is not identified as an area appropriate for an 11 storey building.

If the design approach of the creation of a protective edge to the development along the Long Lane and A40 boundaries is to be taken forward, then there should be larger breaks in the buildings at the upper levels and a greater variation in height, to create a more interesting skyline. As such, the continuous northern edge building to the A40 and Long Lane could be supported, but further modification should be considered for it to work as an acoustic/air quality barrier. Concerns remain about the view from Ickenham Manor, as the scheme would appear as a large block on the horizon and very visible above the tree line. This suggests that the roofline of the development still needs more thought; and ideally lowered in places to create a more broken and interesting skyline.

Your team was advised that there may be scope to include a taller building at the Hillingdon Circus junction, or at the north-west corner where the road rises up and the additional bulk of the building can be screened by the embankment. However, overall the buildings should be no more than 4- to 5 storeys generally and up to 6 storeys in the areas identified above, with the upper floors set back. You are advised to consider setting back the top floors to taller perimeter block buildings further break down massing.

The design of the blocks is difficult to comment on at present, due to lack of sufficient information.

## LANDSCAPING

Hillingdon UDP (UDP) policies, OL1-OL7, BE5-BE7, BE26 and BE38, and PR23 and PR24, and the planning briefs for A40 Western Avenue and Hillingdon House Farm are relevant in terms of landscape planning and the scheme. Saved Policy PR23 in the UDP reflects the planning brief adopted in 1990 and refers to nine objectives relating to land within the Green Belt and the 'Developed Area' at Hillingdon Circus, of which the site forms part, adjacent to the Green Belt. The site is in the vicinity of the Western Avenue, A40 Area of Environmental Opportunity, to which policy OL9 applies. Emerging site specific Policy SA 14 identifies a

need for development proposals in this location to reinforce and enhance the Green Belt landscape to improve its visual function.

Emerging Policy DMHB 14: (Trees and Landscaping) states that:

- A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.
- C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.
- D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the tree will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to off-site provision.

At the strategic level, London Plan Policy 7.4 identifies that development proposals should provide a high quality design response that contributes to a positive relationship between the urban structure and natural landscape features, including the landform and topography of the area.

The site benefits from the green spatial buffer of Council land to the south and Green Belt open space to the east, with access to Freezeland Covert and the Hillingdon Trail / Celandine Route.

Part of the site is covered by TPO 6, however there are no remaining trees on the development site which are protected by the TPO, although two oaks survive on the Council-owned land in the south-east corner- T7 and T9 on the schedule.

The willows near the site entrance are visually dominant.

This pre-application submission follows the refusal of application ref. 2017/3183 for development of the former Master Brewer site. The site previously received committee approval for a mixed use development (Tesco Store and residential).

The following comments are based on the submitted pre-app document, dated August 2019, Technical Notes prepared by BMD and the site meeting with part of the design team on 19 September 2019.

A brief Technical Note about an Arboricultural Impact Assessment confirms that an updated tree survey has been prepared (although not yet submitted). The area surveyed includes the site to be developed, the Hillingdon-owned land in the south-east corner and the recently acquired plot of Green Belt land (comprising grassland, scrub and woodland) immediately to the east of the site.

Many trees have already been removed from the centre of the site, leaving the boundary trees along the west (Long Lane) boundary, the north (A40 boundary), east (Freezeland Covert boundary) and the south (Hillingdon-owned land).

According to the information gleaned at the site meeting additional tree removal will be required to facilitate the development. Essentially the only remaining landscape buffers around the boundaries will be the 'borrowed' landscape - managed by others - on the Long Lane road embankment, above the A40 retaining wall and on Hillingdon-owned land. The lapsed hedgerow along the Freezeland Covert boundary will remain under the control of the developer, however, it is envisaged that only selected lengths will be retained as part of the



final layout.

The technical note confirms that 8% of the trees on site were 'A' grade trees and 47% were 'B' grade - most of which have already been removed.

The current layout includes built development rising to up to 11 storeys. Buildings along the west and north boundaries will be designed to take into account the adjacent road noise. This will include dual-aspect units with balconies and / or podium level gardens facing the quieter, sheltered south. The sketch layouts indicate a greater area of ground level green open space within the centre of the site, compared with the refused application.

The purchase of the plot of Green Belt land will be used to provide better visual permeability and physical connectivity with the public open space of Freezeland Covert. It is understood that the proposed replacement tree planting exceeds that of previous schemes.

A technical note has been provided to explain the methodology of the TVIA, together with the proposed view points which exceed those previously considered. The TVIA will be considered once received.

The tree loss on this site is significant, however, this loss was previously accepted as part of the Tesco (Spenhill) scheme. Nevertheless, the additional height of development will inevitably have greater visual impact on the surrounding receptors. While the open spaces within the site appear to be an improvement on the previous schemes, the potential adverse effects on daylight and microclimate are, as yet, unknown.

While the acquisition of the plot of Green Belt land to the east will benefit the scheme, the footprint of grey development has been moved closer to the Green Belt boundary. In addition to providing attractive and accessible amenity space for residents the landscape layout should provide safe and attractive play spaces for children.

The aim should be to retain only the best trees on-site which have a potentially useful life expectancy. It is the Council's expectation that the future layout of the site should be designed to secure the long-term retention of the valuable and new trees, taking account of their growth potential.

Within the central area, the aim should be to secure as much green open space as possible. The area around the entrance and central urban hub could be more open in character, to facilitate access and wayfinding, with shared surfacing. Within the central site, parking bays should be grouped compactly, to minimise impact on landscape character. A spatial buffer between the built development and the northern boundary should be landscaped to ensure that they are pleasant or comfortable spaces for residents to use.

A screen/buffer will be required between the site and the adjoining Green Belt and tree planting on the roads frontage. The existing hedgerow along the northern boundary should be retained and enhanced through management and re-planting, to maintain and enhance its role in screening the site from the A40.

The site's eastern boundary provides an effective screen to much of the proposed residential development. It is recommended that work is undertaken to this boundary planting to further improve its form and screening effectiveness. As with the previous schemes approved by committee, it is also likely that a woodland buffer may be required on the adjacent Green Belt land, to further supplement the existing eastern boundary planting. This woodland buffer would be delivered through a Section 106 Agreement.

Any future submission should be supported by a Design and Access Statement with a strong landscape strategy section - or a separate Landscape Report. The statement should include images and illustrations which convey the quality of spaces and examples of finishes and

(hard and soft) landscape materials which will be used. In terms of information, any future planning application should include:

- (1) A survey of the trees on and close to the site, an assessment of the arboricultural (tree-related) implications of the development and tree protection information required by BS5837:2012, and a 'tree protection, demolition and construction method statement;
- (2) A comprehensive landscape master plan and/or landscaping proposals will also be required in order to demonstrate compliance with Saved UDP Policy BE38.
- (3) A plan for the long-term management of the trees and landscape of the site.
- (4) Associated information about proposed underground services, street lighting etc.
- (5) Existing and proposed levels and services.
- (6) A lighting scheme is required to take account of any ecological issues.

If the scheme provides communal facilities to service future occupiers, these spaces should be appropriately landscaped to ensure maximum utility.

Finally, the urban greening factor has been introduced as part of the London Plan, as a means of scoring the merit of various green infrastructure and SUDs interventions across the urban environment. The developer should provide a measured assessment and scoring of these landscape and wider environmental benefits provided by the development, to aid the assessment of the scheme by the LPA.

### 3. Amenity

Policy BE20 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will seek to ensure that buildings are laid out so that adequate daylight, sunlight and amenities of existing houses are safeguarded. Policy BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that planning permission will not be granted for new development, which by reason of its siting, bulk and proximity, would result in a significant loss of residential amenity of established residential areas.

The supporting text to Policies BE20 and BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states 'that while some proposals of substantial width, height and depth, may not cause loss of amenity by reason of daylight or sunlight, these may nonetheless still be over-dominant in relation to the adjoining property and/or its private amenity space. This in turn can result in a depressing outlook detracting from residential amenity'.

Emerging Policy DMHB 13 11: (Design of New Development) states inter alia that:

All development, including extensions, alterations and new buildings will be required to be designed to the highest quality standards and, incorporating principles of good design, including ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

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

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

Whilst there would be no objection in design terms in principle to the site being developed mainly for housing, the surrounding environment is hostile in terms of traffic noise and air quality. These are issues that will need to be factored into the design, as well as the more usual urban design considerations.

Space Standards

The London Plan 2016 at table 3.3, which reflect National Space Standards, recommends minimum unit sizes in order to ensure a good level of internal residential amenity. Emerging Policy DMHB 18 16: (Housing Standards) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. Any submitted scheme should comply with these minimum standards. These represent planning minimum requirements. Larger unit sizes may be required to address housing corporation requirements or wheelchair accessibility standards.

#### Privacy

It will be necessary to ensure that an acceptable living environment is created for prospective residents in terms of privacy and overlooking. Distances of at least 21 metres should be maintained between individual blocks which will be used to make provision towards private amenity space and car parking.

The use of balconies and terraces should only be used where there are no overlooking opportunities to or from adjoining properties. Ideally, balconies should be integrated into the design of the building rather than presented as an external 'add on', to minimise privacy impacts and maximise potential for use.

#### Outlook

There are issues with the poor outlook and amenity of the continuous and finger form blocks on the perimeter that face the A40. The developer is advised to undertake further work to ensure that adequate standards are achieved for future residents of these units, in terms of noise outlook and light, to support the emerging proposal.

#### External Amenity Space

External Amenity Space: Policy BE23 of the Hillingdon Local Plan: Part 2 -Saved UDP Policies (November 2012) sets out that new developments should ensure adequate external amenity space. The HDAS - 'Residential Layouts' sets out the minimum requirements any application will need to comply with these HDAS minimum requirements.

The proposed development should incorporate a children's play area at ground floor level of an appropriate size, in accordance with the London Plan Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation. It should be located within a secure area of the site, subject to natural surveillance from the proposed units.

#### 4. Highways

From the highways perspective, there is no substantive change in proposal (as compared to the previously refused 2019 application (4266/APP/2017/3183)) other than the increase in the number of residential units from 437 to 515 and the lowering of the on-plot parking ratio from 0.5 to 0.3 per unit.

The previous scheme was, amongst other reasons, refused on the grounds of insufficient on-site parking and excessive vehicle trip generation, resulting in potential detrimental burden on the local highway network, namely the signalised Hillingdon Circus junction.

Utilising detail presented within the previous refusal, the developer is strongly encouraged to reflect on the highway/transport content within that committee report which still bears relevance to this revised proposal. You will need to fully justify how this new proposal has addressed the two parking and trip generation refusal reasons, especially in the light of a significant rise in the number of residential units from 437 to 515 and the further reduction in on-site parking provision.

## PARKING

The Council's interim residential car parking standards allows for a maximum of 1.5 spaces per dwelling for communal parking and 2 spaces per dwelling for curtilage parking. 10% of all spaces should be suitable for drivers with disabilities. Parking areas should be designed with regard to 'secure by design' principles (for example, in a manner which enables good surveillance with complementary illumination).

In addition to car parking requirements, 1 motorcycle space should be provided per 20 car spaces and 1 bicycle space should be provided per unit. Bicycle spaces should be provided in a secure, lockable enclosure, with no more than 4 bicycles per enclosure. Again, 'secure by design' principles should be applied when considering siting and design of enclosures.

The Draft London Plan allows for up to 0.75 spaces per dwelling for Outer London sites with a PTAL of 3.

It is understood that the forthcoming application proposes a parking ratio of 0.3 spaces per dwelling unit, which is substantially below both the Council's and London Plan maximum standards. You have been advised that notwithstanding TfL seeking a lower parking ratio, the Council is likely to seek a minimum parking ratio of 1:1 for the residential element of the scheme.

It should be noted that the currently adopted and the emerging Hillingdon Local Plan policies set out the standards the Council consider necessary to provide the right amount of parking within new developments. As stated above, at present, the Council will be seeking a minimum parking ratio of 1:1, given the PTAL value of the site and the indicative unit mix. This approach will ensure that those living in the new homes can park conveniently, without creating additional on street parking demand to the detriment of others. This achieves a balance between the demand for parking and the consequences in terms of congestion and the wider environmental impacts.

The Council has recently reaffirmed its current planning policy relating to car parking spaces for new developments and will resist attempts to reduce this standard at the cost of higher density of future developments. Members had recently reached crossparty agreement to oppose the Mayor's parking standards in favour of local standards. As a result, greater emphasis will be placed upon local standards. As the proposal in its current form falls short of the 1:1 parking ratio standard, the developer is advised to undertake further work to maximise the provision of parking on site, to support the emerging proposal.

## TRAVEL PLAN

Any proposal for a development on a site of this size would need to be accompanied by a Green Travel Plan. Please refer to Best Practice for Workplace Travel Planning for New Development (Transport for London). The threshold stated in TfL Guidance for Residential Travel Planning and applied in Hillingdon is that residential developments of over 80 dwellings will require a full travel plan. Development with less than 80 dwellings is likely to require a less detailed travel plan.

## COMMERCIAL UNITS

Advice on the parking requirements for the commercial element of the proposals can be provided, once the precise uses have been established. It is not clear how the commercial units will be serviced and their parking provision kept separate from resident's parking. In terms of servicing of the commercial units, any retail unit may need to be split, to avoid issues associated with noise and servicing. A unit of approximately 300 sqm could be acceptable as a restaurant but a flexible use (A1/A3) could present noise and transport

issues that would need to be fully assessed by the Council's highway engineer.

## OFF SITE WORKS

At the meeting, it was confirmed that if the scheme were to receive planning permission, all the previously listed highway/transport mitigations (as those indicated within the previous report) would apply to the new proposal with potential review/enhancement. i.e. improved signalised arrangement at Hillingdon Circus, financial contribution toward public transport/sustainable travel including the new 278 bus service etc, with consideration of possible additional measures that could be applied to the public realm to benefit both the scheme and local environment.

## INTERNAL SITE ARRANGEMENTS

The internal road layout should reflect good design practice in accord with the DfT's Manual for Streets (circa 2007) with a predominantly shared road surface arrangement. Especially for this scale of proposal, care should be taken with regard to marrying this form of provision with extensive traffic calming, with a view to lowering overall vehicle speeds thereby promoting a safer environment for the pedestrian community. Design consideration for the visually impaired should also be placed on high priority as acknowledged by the developer at the pre-application meeting.

A Traffic Assessment should accompany any planning application. The scope of the required traffic assessment should be agreed with the Council's Highways Engineer and your Transport Consultants.

## 5. Other

### AIR QUALITY

The NPPF states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

The proposed development is within an Air Quality Management Area (AQMA) and in an area which currently appears to be close to the European Union limit value for annual mean nitrogen dioxide, and may be exceeding the EU limit value adjacent to the A40. The A40 and the areas around the junctions within Hillingdon have been identified as priority areas for improvement with regard to poor air quality. As such, an air quality assessment should be provided as part of any application. This will be assessed by the Council's specialist officers, in conjunction with the submitted transport assessment.

As part of the design, officers will be looking to push back the development from pollution sources such as the A40 and Long Lane, incorporate low/zero emissions technologies with regard to energy and will seek to ensure that any associated transport proposals take the protection of future residents into account. The use of bespoke green infrastructure throughout design to address pollution will be encouraged.

As a minimum, mitigation, in order to ensure the development is at least air quality neutral should be incorporated in the proposals, in accordance with Policy 7.14. (Improving Air Quality) of the London Plan, Policy PT1.EM8 of Hillingdon Local Plan Part 1, Emerging Policy DMEI 14 (Air Quality) and the NPPF.

### NOISE

Saved Policies OE1 and OE3 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies

(November 2012) seek to protect the environment from the adverse effects of pollutants and to ensure sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable.

The most significant noise source affecting the site is road traffic noise from the A40 and A437 (Long Lane). To the north east of the site is RAF Northolt and to the west of the site is a railway line, although the latter may affect the ambient noise levels to a lesser extent.

Given the proximity of the site to busy roads to the north and west, any planning application will require a noise assessment. The Council's Supplementary Planning Document: 'Noise' provides further advice on this matter.

## CONTAMINATION ISSUES

Applications for sensitive developments (including housing) should be supported by a desk top study confirming known or potential contamination issues. The level of information required at this stage will vary, dependent on the Local Planning Authority's concerns.

Further information can be found in the Council's Supplementary Planning Guidance 'Land Contamination', which is available on the Council's website. Clarification, if required, can be sought from the Council's Specialist Simon Snape ([ssnape@hillington.gov.uk](mailto:ssnape@hillington.gov.uk)). Applications will be distributed to the Council's specialists and if necessary, to the Environment Agency for their comment, and conditions recommended by these bodies applied in the event of an approval.

## CRIME PREVENTION

The design and layout should also have regard to secure by design principals. You may wish to contact Adam Lindsay of the Metropolitan Police on (ph# 0208 733 3703 or 07825103933) or by e-mail: [DOCOMailbox.NW@met.police.uk](mailto:DOCOMailbox.NW@met.police.uk) to discuss means of ensuring community safety by design. An early involvement by the Crime Prevention Adviser is encouraged.

## WASTE MANAGEMENT

Policy 5.17 of the London Plan sets out the Mayors Spatial Policy for Waste Management, including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. The bin stores which should have external access, be convenient for use by residents and appropriate for servicing. Any refuse or recycling stores should be located within an appropriate distance of the vehicle collection point to enable easy servicing by refuse vehicles.

## RENEWABLE ENERGY / SUSTAINABILITY

Applicants are advised to consult the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction (available at [http://www.london.gov.uk/mayor/strategies/sds/sustainable\\_design.jsp](http://www.london.gov.uk/mayor/strategies/sds/sustainable_design.jsp)) to assist in achieving a sustainable development.

### Energy

Policy 5.2 of the London Plan states that major residential developments should meet the following reduction targets for carbon dioxide in buildings build to 2010 Building Regulation standards:

From 1st October 2016 all major residential schemes will need to comply with the Zero Carbon standard. Guidance from the GLA is that all major residential schemes (including those part of mixed used proposals) will have to demonstrate at least 35% CO2 reductions

on site. The remainder (if any) will be offset through a payment per carbon tonne as part of a S106 or Unilateral Undertaking.

We would expect to see a full energy assessment which incorporates a strategy (or strategies) as to how the zero carbon reduction would be achieved. It is acceptable to set out a couple of different options for reaching the reduction, provided that there is clear analysis of their applicability within the development. The zero carbon must be set against a clearly defined 2013 Building Regulation baseline, measured in kWh and KgCO<sub>2</sub>. This should be a total for the whole development. The designs of the development must clearly incorporate the identified measures. For example if PVs are proposed, we would expect to see a roof plan setting out the location, orientation, pitch and the appropriate amount.

The Technical Note Hillingdon Gardens - Summary of Proposed Energy Strategy and Sustainability Requirements dated 29th July 2019 states that the development will meet Zero Carbon for the residential elements. The details will need to be fairly well advanced ahead of a determination, to ensure any offset payment is secured through a S106 Agreement.

## Sustainability

### Electric Charging Bays

Policy 6.13 of the London Plan requires 1 in 5 parking spaces to be served by an electric charging point. The Council would require a strategy that shows 40% of all spaces to be served by a charging point with plan for phasing in future points (i.e.20% active; 20% passive for the residential component of the scheme).

### Water Resources

The Borough is in a seriously water stressed area and we would expect to see proposals that achieve 105 litre per person per day, in accordance with Policy 5.15 of the London Plan. We would also expect the initial proposals to demonstrate the inclusion of water collection and reuse measures to reduce the demand on potable water.

Further guidance on Energy and Sustainability on an updated scheme can be provided on request by the Council's Sustainability Officer (Ian Thynne -ian.thynne@hillingdon.gov.uk) who will be able to advise you on energy issues.

## ECOLOGY

The site previously had an extensive range of foliage around the cleared buildings. The central trees have now been cleared. The site was also home to an ornamental pond. The combination of the entire on-site flora provided a fair to good quality environment for a diverse range of species. Bats have been recorded on the site.

The proposals to remove large quantities of flora including part of the tree belt to the east means the loss of a significant amount of fair to good quality natural environment. This loss needs to be compensated for.

The development will need to undertake a Phase 1 habitat survey of the entire site, including the tree belts to the east and north. Any further surveys recommended by this report will need to be submitted prior to determination, and should ideally be submitted prior to validation. Natural England advises against validation of applications where further surveys are required.

The site is fairly constrained and there is not much room for ecological compensation within the context of the development. Any additional planting will generally be dispersed for the purpose of landscaping in an ornamental manner, as opposed to an ecological context. The

applicant will need to demonstrate that the loss of all the ecological features can be compensated for. In accordance with the London Plan, the development should also contribute to ecological enhancements. If the compensation and enhancements cannot be located on site, then the applicant should investigate the possibilities of off site works.

Due to the constrained nature of the site, it is more likely that the off site option is preferable. The applicant is therefore advised that prior to determination, a clear strategy will need to be put in place that clearly demonstrates the development will mitigate and enhance the existing ecological features.

## FLOODING

The site does not appear to fall within a flood plain. Notwithstanding this, the size of the site (>1ha in area) is such that a Flood Risk Assessment will be required as part of any planning application. Please note that the site is adjacent to a critical drainage area.

## MoD SAFEGUARDING

The site falls within the RAF Northolt flight path. The MoD may have concerns regarding heights of buildings, cranes and materials. You are advised to seek early contact to discuss height restrictions.

## 6. Planning Obligation and CIL (Mayor and LBH)

### S106 PLANNING OBLIGATIONS

Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) requires that where developments generate the need for additional facilities, financial contributions will be sought. The Council has formally adopted its Planning Obligations Supplementary Planning Document (supplementary planning guidance). The proposed development is likely to generate requirements for planning obligations in respect of:

1. Affordable Housing
2. Construction Training: in line with the s106 SPD an in kind scheme delivered during the construction phase will be sought as a result of this proposal.
3. Highways: in line with the S106 SPD, any and all highways works will be required to be met by the applicant.
4. Landscape Screening and Ecological Mitigation
5. Air Quality
6. Public Transport contribution - towards North/South bus routes
7. Project Management and Monitoring Fee: in line with the s106 SPD a contribution equal to 5% of the total cash contributions secured under the s106 will be sought to enable the management and monitoring of the resulting agreement.

### 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 100m<sup>2</sup> 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 £35 per square metre. 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 will be £95 per square metre for the residential element of the proposals. It is not possible to provide figures for the commercial element as insufficient information has been provided. Should you require further information please refer to the Council's Website



It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

#### FINANCIAL VIABILITY ASSESSMENTS (FVAs)

Applicants are advised that two versions of the FVA must be submitted as part of a planning application:

- 1) A full FVA, used for full consideration of financial implications.
- 2) A redacted FVA removing any commercially sensitive information alongside a signed statement confirming that your viability appraisal has been prepared in accordance with best practice and the RICS guidance (paragraph 4.5.4 RICS Financial Viability in Planning), with a clear explanation of why the redaction is appropriate having regard to the tests in the Act (for the purposes of FOI).

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

#### 7. Application Submission

Confirmation of the list of documents to be submitted:

- Covering letter,
- Planning application form and ownership certificates,
- Community Infrastructure Levy Additional Information Form,
- Design and Access Statement (including Photographs And Photomontages;; Refuse Disposal Details; Secure By Design Statement; and Wheelchair Accessibility Statement),
- Application drawings (including site location plan; existing site plans; and proposed floorplans, sections and elevations @ 1:200)
- Planning Statement (including Planning Obligations/Draft Heads Of Terms
- Transport Assessment,
- Travel Plan,
- Statement of Community Involvement,
- Air Quality Assessment,
- Acoustic Assessment,
- Flood Risk Assessment and Surface Water Strategy,
- Land Contamination Assessment,
- Tree Survey/Arboricultural Implications,
- Energy and Sustainability Statement,
- Daylight/Sunlight Assessment,
- Landscaping Strategy including amenity/play space assessment, landscape masterplan and drawings,
- Ecology Survey and Phase 1 Habitat Report,
- Townscape Visual Impact Assessment,
- Bird Strike Mitigation,
- M+E Concept Design / Utilities Statement,
- Ventilation Statement, and
- Archaeology Statement.
- Viability Statement - confidential
- Viability Statement - redacted
- EIA Screening (Already submitted)

#### 8. Conclusion

The principle of the a residential led mixed use scheme is considered to meet the policy requirements of the adopted Development Plan, emerging policy and the Council's objectives for the site, subject to issues of appropriate mix of commercial uses, scale, density, traffic intensification, parking and impact on the Green Belt being suitably

addressed.

The main issues that need to be addressed in relation to the proposal are highways issues and the the scale of the proposed residential use. In addition, urban design and sustainability issues will need to be satisfactorily resolved.

It is acknowledged that the present open and degraded site together with the poor quality development on adjoining land to the west, are major detractors in Hillingdon Circus's function as local shopping centre. This is made worse by the presence of a heavily engineered highway infrastructure and the domination by road traffic, resulting in a chaotic mix. The site is clearly in need of an appropriate scheme of redevelopment, bringing regeneration, vibrancy and improvements to the townscape of North Hillingdon, as recognised in the Local Plan. However these need to be integrated in a way that brings environmental improvements to the whole environment of the Circus and not merely the site itself.

The current scheme is substantially denser than the Spenhill schemes which Committee resolved to grant planning permission in 2014, subject to a s106 Agreement. This approved in principle scheme was for a lower rise scheme of 4 to 5 storeys, with a taller focal element of a 6 storey at the south west corner. The spacing between the blocks was more in proportion to their heights, and the relationship to the Green Belt.

This current 4 to 11 storeys scheme greatly exceeds the density, height, scale and massing of the 2014 scheme and it is considered that that the impact of development is overbearing and incongruent with it's townscape surroundings and landscape setting.

The scale and massing needs to be reconsidered. The scheme currently requires further enhancements with respect to design, layout and scale, to ensure that the development is of an acceptable quality overall. The height of the proposed blocks remains a concern and there is a need to refine the adopted approach, to create a scheme with character fitting with North Hillingdon built form and to achieve an appropriate edge to the settlement.

Any future development needs to preserve or enhance the character of the surrounding area, having regard to adjoining land uses including the adjacent Green Belt. In terms of the residential element, the provision of a satisfactory residential environment should be ensured. This includes the provision of an appropriate level of amenity space and compliance with HDAS guidance. Landscaping proposals should be presented as part of the main application.

In Transport/Highway terms, the acceptability (or otherwise) of a future planning application will be dependent on final designs and an appropriate response to the comments and recommendations made within this appraisal. This includes capturing and addressing all of the relevant technical aspects and concerns raised within the highway/transport section of the planning committee report for the refused 437 unit scheme.

As highlighted at the pre-application meeting, a strong element of concern remains with the further reduction of on-plot parking provisions and the imposed traffic burden the proposal, as presented, is likely to bring. In terms of the proposed car parking provision, as the proposal in its current form falls short of the 1:1 parking ratio standard, the developer is advised to undertake further work to maximise the provision of parking on site, to support the emerging proposal.

#### 9. Planning Performance Agreement

Central Government encourages the use of PPAs for larger and more complex major planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process. Currently the planning officers carry high workloads and given the importance of your project should you require a

dedicated planning resource focusing on your application to ensure it is dealt with as a priority, it is highly recommended that you enter into a PPA, which would involve funding from the developer to allow the Authority to hire an additional planner to act as a dedicated case officer for your proposals.

The key advantage to entering into a PPA is that the Council will have the resources in place to ensure that the application proceeds through the application process in a timely fashion and result in high quality development. Mandip Malhotra is available to discuss the details of a PPA ([mmalhotra@hillington.gov.uk](mailto:mmalhotra@hillington.gov.uk)), or please do come back to me should you have any queries.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

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Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Karl Dafe  
Principal Planning Officer  
Major Applications Team  
London Borough of Hillingdon**

#### Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

**Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.**

