

Planning Statement

Inland Limited

Hillingdon Gardens
Former Master Brewer Motel Site
Freezeland Way
UB10 9PQ

October 2019

Prepared by

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Public

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This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

DATE	ORIGINATORS	APPROVED
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Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 INTRODUCTION

1.1 This Statement has been prepared by GL Hearn in support of a detailed planning application submitted by Inland Limited (hereinafter referred to as 'the Applicant') in respect of the redevelopment of the Former Master Brewer motel site, Freezeland Way, Hillingdon, UB10 9PQ (hereinafter referred to as 'the site'). For the purpose of this application the site is also referred to as 'Hillingdon Gardens'. A Proposed Site Plan is provided at Appendix A.

1.2 This application seeks planning permission for the following proposed development ('the development'):

"Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (164 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development".

1.3 This statement should be read and considered in conjunction with the plans and drawings submitted as part of the detailed planning application. The submission format meets the requirements agreed with the Council during pre-application discussions and comprises the following suite of documents:

- Cover Letter (GL Hearn);
- Planning Application Form and Ownership Certificates (GL Hearn);
- Community Infrastructure Levy Additional Information Form (GL Hearn);
- Planning Statement (GL Hearn);
- Design and Access Statement and Masterplanning Principles (JTP);
- Detailed Application Drawings (Collado Collins);
- Transport Assessment (WSP);
- Travel Plan (WSP);
- Statement of Community Engagement (Terrapin);
- Air Quality Assessment (Create Consulting);
- Acoustic Assessment (Spectrum);
- Flood Risk Assessment and Surface Water Strategy (ICIS Design Limited);
- Land Contamination Assessment (Delta Simons);
- Tree Survey and Arboricultural Implications (Bradley Murphy Design);
- Energy and Sustainability Statement (Cudd Bentley);
- Daylight/Sunlight Assessment (Robinson Consulting);
- Landscaping Masterplan and Drawings (Bradley Murphy Design);
- Ecology Phase 1 Habitat Report (Bradley Murphy Design);
- Townscape Visual Impact Assessment (Bradley Murphy Design);

- Bird Strike Mitigation (Bradley Murphy Design);
- M+E Concept Design (Cudd Bentley);
- Ventilation Statement (Cudd Bentley);
- Archaeology Statement (AOC);
- Topographical Survey; and
- Fire Strategy

- 1.4 In addition, the application submission is supported by masterplan drawings prepared by JTP, detailed architectural drawings prepared by Collado Collins Architects, and landscape drawings by Bradly Murphy Design, which are listed in Appendix B.
- 1.5 This statement provides an overview of the site, the development proposals and an evaluation of the proposed development against relevant national, strategic and local planning policy guidance.

Background

- 1.6 The site was acquired by the Applicant from Meyer Homes in February 2019. The site has been subject to numerous development proposals and has an extensive planning history (as set out within Section 4 of this Statement), which focussed on the delivery of a retail-led scheme, before more recently a residential-led scheme.
- 1.7 This planning application follows an application submitted 2017 (4266/APP/2017/3183) which was refused for the construction of a residential-led, mixed-use development comprising buildings between 4 and 9 storeys to provide 437 residential units; employment floorspace (Use Class B1(a-c)); and flexible commercial floor space. Since the refusal of this scheme the Applicant has acquired a further parcel of land at the eastern end of the site. This further enables the scheme to be better integrated with the adjacent area of Green Belt and improves accessibility to open space for the benefit of the local community. This proposal aligns with the Council's long term and emerging aspirations for North Hillingdon and the emerging Local Plan: Part 2 Site Allocations and Designations (Clean Version with Proposed Modifications, 2019, hereafter referred to as LPP2).
- 1.8 In developing the current application proposal, the Applicant has undertaken extensive consultation with the local community and has engaged in an open and transparent dialogue with key statutory consultees. The Applicant has engaged with the local community and local community groups including the Ickenham Residents Association, Oak Farm Residents Association and the Ickenham Neighbourhood Plan Group. The Applicant has also engaged with the London Wildlife Trust. The submission proposal has been subject to, and reflects, pre-application discussions held with the Greater London Authority ('GLA'); the London Borough of Hillingdon (LBH or LB Hillingdon) (acting as the Local Planning Authority ('LPA')); and Transport for London ('TfL').

- 1.9 Preapplication advice has also been sought from the Ministry of Defence (MOD) Defence Infrastructure Organisation (DIO) owing to the site's proximity to the Royal Air Force Northolt to the east.
- 1.10 The Applicant is committed to on-going dialogue during the determination process with the above-mentioned consultees and individuals.

Vision

- 1.11 The vision for Hillingdon Gardens is to establish the site as a residential-led, mixed-use scheme, which forms an integrated part of the wider North Hillingdon Local Centre. The proposal will deliver high quality new homes in a green urban setting, incorporating new public realm that will be accessible to the existing community of North Hillingdon. The access and landscaping strategy will increase pedestrian permeability within and through the site. The strategy has been conceived as a series of spaces establishing new and improved connections to the wider community and to the area of Green Belt land located to the east of the site.
- 1.12 Key objectives:
- Creation of a neighbourhood with clearly defined links to North Hillingdon Local Centre;
 - Provision of uses appropriate to the site's location within the North Hillingdon Local Centre;
 - Creation of a residential-led, mixed-use scheme with an appropriate mix of dwelling types and density to provide much needed new homes in the borough;
 - Provision of a range of housing types and tenures on site;
 - Contribution to the regeneration of North Hillingdon and delivery of the adopted and emerging policy aspirations for this area; and
 - Sustainable regeneration of an underutilised brownfield site.

Structure of Statement

- 1.13 The purpose of this statement is to describe the key characteristics of the application site, surrounding area and the proposed development. It goes on to assess the principle issues arising from the proposal in light of the relevant planning policy context and relevant material considerations. This statement is structured as follows:
- **Section Two** provides a summary of the planning benefits of the proposed development;
 - **Section Three** describes the existing site and surrounding area;

- **Section Four** describes the planning history pertinent to the proposal;
- **Section Five** provides a description of the proposed development;
- **Section Six** summarises the planning consultations undertaken;
- **Section Seven** outlines the planning policy framework relevant to the proposed development;
- **Section Eight** assesses the proposals against the provisions of the relevant national, regional and local planning policies and other material considerations;
- **Section Nine** outlines the proposed S106 draft Heads of Terms and CIL contributions; and
- **Section Ten** sets out the conclusions.

2 SUMMARY OF PLANNING BENEFITS

2.1 The proposal delivers a series of significant benefits to the local area as summarised below.

Regeneration of Hillingdon Circus

- Sustainable regeneration of a 2.53ha brownfield site through the provision of high-quality place-making and design;
- Creation of a new, secure and inclusive residential neighbourhood;
- Utilisation of an under-used and unattractive site, which makes limited contribution to the North Hillingdon local Centre and currently detracts from the setting of the adjacent Green Belt located to the east of the site;
- Delivery 514 new residential units, of which 35% will be affordable, making a valuable contribution to the annual housing requirement for the borough;
- Provision of a mix of uses that will promote and enhance the vitality and viability of the Local Centre;
- Integration of the site within the existing local centre, delivery of a high quality and distinctive development that will assist in reinstating the 'Circus'.

New Affordable Employment Opportunities

- Potential for new jobs and spin off economic activity including construction jobs and supply chain linkages;
- On-site commercial space creating long-term employment opportunities.

Landscaping and Public Realm

- Significant landscaping improvements that will enhance the site and surrounding area, generating environmental improvements whilst also improving connections and pedestrian experience to and from the site;
- Urban greening and biodiversity net gain; and
- A hierarchy of formal and informal play spaces for children of all ages.

Transport Network and Public Transport Improvements

- A series of transport-related improvements and initiatives to be delivered as part of the development including:
 - A contribution to cover a mitigation solution at Hillingdon Circus
 - Electric vehicle charging provision above London Plan requirements
 - The provision of four car club bays
 - Provision of one complimentary Oyster Card with £40 credit per household upon first occupation
 - Contribution towards bus improvements
 - Provision of a Travel Plan, supported by a comprehensive Park Management Plan

Contributions

- In addition to the above-mentioned benefits, the Applicant will be entering into more detailed discussions regarding relevant and necessary financial contributions to further support the development proposal.
- The development will be required to make Community Infrastructure Levy (CIL) contributions in accordance with the rates set out in the Hillingdon Council Charging Schedule (April 2014) and Mayoral Community Infrastructure Levy 2 (MCIL2) (April 2019).

3 SITE AND SURROUNDING AREA

Overview

- 3.1 The following section describes the key characteristics of the application site and surrounding area. An assessment of the constraints and opportunities associated with the site and wider area is set out within the accompanying Design & Access Statement.

The Application Site

- 3.2 The application site is located to the west of Central London and south of the A40/Western Avenue within the London Borough of Hillingdon. Uxbridge Town Centre is located approximately 2.3 km to the south-west of the site and Ickenham approximately 1.6km to the North. The site is bounded to the south by Freezeland Way and to the immediate west by Long Lane/A437. Designated Green Belt land is located to the east of the site and extends in this direction along the majority of the North Hillingdon Settlement Boundary.

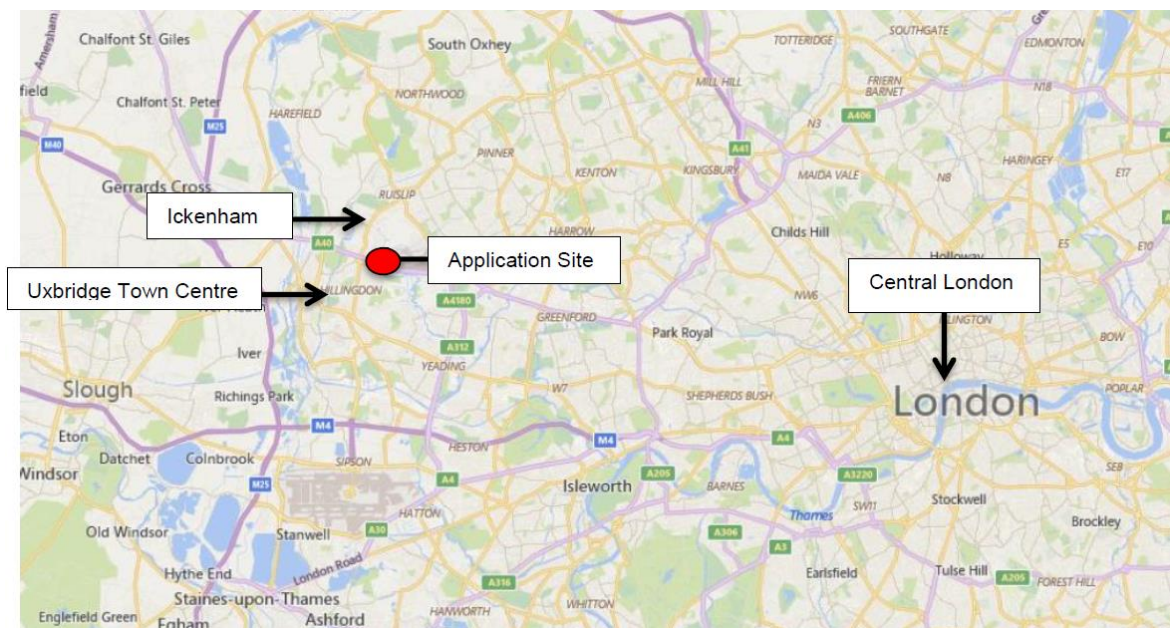


Figure 1: Wider site location plan

- 3.3 The application site area measures approximately 2.53 ha and is located within North Hillingdon Local Centre. The site was formerly occupied by the Master Brewer Motel, a public house/motel with 106 bedrooms, conferencing and restaurant facilities and 200 parking spaces. Following demolition of the Motel and associated buildings, the site is currently derelict and awaiting redevelopment. The site has been vacant for some 9 years (buildings demolished in 2009, vacant since 2008).

- 3.4 The site is largely self-contained, separated (visually and physically) by the surrounding highways network, most notably A40 Western Avenue and A437 Long Lane to the north and west respectively (but completely open on the eastern site boundary, which is designated Green Belt).
- 3.5 In its current form, the site comprises hard standing and semi-mature vegetation with large advertising boards located on the boundary adjacent to Long Lane. Semi-mature and mature boundary planting envelope the site on each of its boundaries. 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).
- 3.6 Vehicular access to the site is provided via one existing access point from Freezeland Way, albeit this access point has been blocked with temporary concrete bollards and fencing. There is also an unused vehicle crossover on the south-west corner from Long Lane North.
- 3.7 The site is well-served by public transport, located approximately 200 metres east of Hillingdon London Underground Station, which provides access to Central London via the Metropolitan and Piccadilly lines. This station is adjacent to TfL bus routes and coach stops, which provide services to Ickenham, Uxbridge, and Oxford. In view of the site's proximity to public transport, it has a Public Transport Accessibility Level of 3 (PTAL).
- 3.8 The application site is allocated as a 'Local Centre' in the emerging Local Plan. The introduction of community facilities and an increase in population on the Site will provide local employment and stimulate local businesses in the area.
- 3.9 Inland Homes have also acquired a parcel of land on the site's eastern boundary that falls within the Green Belt. As detailed in the Design and Access Statement and Landscaping Proposals for the site, the development of Hillingdon Gardens will utilise the proximity of this land to the site's eastern boundary to provide integrated landscaping and connections to the wider area. The application site does not contain, nor is it within the setting of, any designated heritage assets.

Surrounding Area

- 3.10 The wider built environment is characterised by predominantly 2/3 storey detached and semi/detached residential and commercial properties. Within North Hillingdon Local Centre, commercial uses and services are typically accommodated at ground floor with residential uses above.
- 3.11 In view of its location and size, the site marks a distinct transition between the urban nature of North Hillingdon Local Centre and the wider suburban residential area. Owing to its size, accessibility to

public transport links, inclusion within the North Hillingdon Local Centre and separation in visual and physical terms from the surrounding townscape by reason of the significant highway network; the site is notably unique from the more typical 'suburban' residential typology of the surrounding area, operating as an urban 'island site' within a wider suburban context. It is on this basis that the development proposals have emerged.

4 PLANNING HISTORY

- 4.1 The following section provides a summary of the pertinent planning history relevant to the site and its proposed redevelopment. Consideration has also been given to relevant planning applications within the immediate area.

EIA Screening Opinion

On 2 August 2019, an EIA Screening Opinion was requested by GL Hearn on behalf of the applicant from the London Borough of Hillingdon (see Ref: [4266/APP/2019/2607](#)). The Screening request included a Screening Report which provided an initial assessment of the proposed development in accordance with the 2017 EIA Regulations. LB Hillingdon was formally asked for their opinion on whether or not an EIA would be required for the Hillingdon Garden proposals. On 3 October 2019 LBH provided written confirmation that an EIA would not be required.

Application Site Planning History

2017 – Full Planning Application (4266/APP/2017/3183) and Request for an Environmental Impact Assessment Screening Opinion

- 4.2 Full planning application for “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 application was refused on 21 March 2019.**
- 4.3 A request for an Environmental Impact Assessment Screening Opinion was made to the LPA on 25 July 2017 in relation to the residential-led redevelopment of the Site. **On 24 August 2017, the LPA confirmed that the development proposal will not require EIA.**

2014 – Full and Outline Planning Applications (4266/APP/2014/518 and 519)

- 4.4 For a “mixed-use redevelopment of the former Master Brewer Motel comprising the erection of a foodstore, measuring 3,543 sqm (GIA) (Use Class A1), with 179 car parking spaces and 32 cycle spaces; an additional 3 retail units, measuring 1,037 sqm (GIA), (Use Class A1 to A5); a 70 bed hotel (Use Class C1) and 19 car parking spaces and 4 cycle spaces; 125 residential units (Use Class C3) with 100 car parking spaces and 138 cycle parking spaces and associated highways alterations together with landscape improvements”. The application achieved resolution to grant full and outline

planning permission (subject to s106 agreement) on 27 August 2014. **Application subsequently marked 'No Further Action'.**

2012 – Full and Outline Planning Applications (4266/APP/2012/544 and 4266/APP/2012/1545)

- 4.5 For a “Mixed-use redevelopment of the former Master Brewer Site comprising the erection of a food store, measuring 3,543 sqm (GIA) (Use Class A1), with 181 car parking spaces and 32 cycle spaces; an additional 3 retail units, measuring 1037 sqm (GIA), (Use Class A1 to A5); a safer neighbourhoods unit, measuring 100 sqm (GIA) (Use Class D1); an 84 bed hotel (Use Class C1) and 18 car parking spaces and 16 cycle spaces; 125 residential units (Use Class C3) with 99 car parking spaces and 150 cycle parking spaces and associated highways alterations together with landscape improvements”. **This application was refused on 2 December 2013.**

2011 – Full and Outline Planning Applications (4266/APP/2011/2034 and 4266/APP/2011/2035)

- 4.6 Full and Outline Planning applications involving “Mixed use redevelopment of the former Master Brewer Site comprising the erection of a food store, measuring 3,312 sqm (GFA) (use class A1), with 198 car parking spaces and 32 cycle spaces; an additional 3 retail units, measuring 1,034 sqm (GFA), (use class A1 to A5); a safer neighbourhoods unit, measuring 100 sqm (GFA) (use class D1); an 84 bed hotel (use class C1) and 22 car parking spaces and 4 cycle spaces; 53 residential units (use class C3) with 56 car parking spaces and 60 cycle parking spaces and associated highways alterations together with landscape improvements”. **This application has been marked with 'No Further Action'.**

2005 – Outline Planning (in duplicate form) (4266/APP/2005/2978 & 4266/APP/2005/2979)

- 4.7 Two outline planning applications were submitted for the erection of a Tesco superstore (7,673 m²), 1,244m² of additional space for A1, A2, A3, A4 or D1 uses within the Use Classes Order, car parking for 409 cars, 205 residential apartments, including affordable housing, together with 205 car parking spaces, highway alterations and landscaping and the demolition of the Master Brewer Motel. **The application was refused on 14 June 2006.**
- 4.8 Duplicate application 4266/APP/2005/2979 was the subject of an appeal for non-determination. The Council subsequently resolved that if they had the power to do so the application would have been refused for the above-mentioned reasons. It should be noted that during the inquiry process the Council's reasons for refusing the application in respect of Green Belt and cumulative impact were removed. **The appeal was subsequently withdrawn January 2007.**

2004 – Outline Planning Application (4266/APP/2004/2715)

- 4.9 Outline Application submitted for the redevelopment of the site to provide a comprehensive mixed-use scheme comprising Use Class A1 food store (8,819m²), 4 retail units (805m²) and retail parking for 538 vehicles, plus 220 residential units including affordable housing and parking for 230 vehicles, highway alterations to Long Lane and Freezeland Way including new access to the site off Freezeland Way (involving demolition of the Master Brewer Motel). **The application was refused on 23 December 2004.**

Table 1: Summary of Site Planning History

	2004 Proposal	2005 Proposal	December 2010 Consultation	2011 Proposal	2012 Proposal	2014 Proposal	2017 Proposal
Foodstore (GFA)	8,819sqm	7,673sqm	3,312sqm	3,312sqm (excluding Boh and delivery area)	3,543sqm (excluding Boh and delivery area)	3,543sqm (excluding Boh and delivery area)	None
Hotel	None	None	120 rooms	84 rooms	84 rooms	70 rooms	None
Independent Retail Units (GIA)	805sqm	1,244sqm	998sqm	1,034sqm	1,037sqm	1,037sqm	425sqm
Homes	220 Units (Circa 30% affordable)	205 units (Circa 30% affordable)	142 units (53 Spenhill Land / 89 Council)	53 units (0% affordable)	125 units (15% affordable)	125 units (15% affordable)	437 units
Commercial	None	None	None	None	None	None	341sqm
Community Facility (GFA)	None	None	Safer Neighbourhood Unit 100sqm	Safer Neighbourhood Unit 100sqm	Safer Neighbourhood Unit 100sqm	None	None
Parking	768	614	297	319	298	298	219

Other Relevant Planning History within the Surrounding Area

Land Adjacent to Hillingdon Station & Swallow Inn, Long Lane, Hillingdon (former Ruston Bucyrus site, located to the west of the subject site and Long Lane)

2012 – Full Planning Application (3049/APP/2012/1352)

- 4.10 Full Application for the “Demolition of the existing public house and timber yard, and the erection of a mixed-use redevelopment comprising a foodstore (7829sqm GEA) (Use Class A1); a 6 storey 82 bed hotel (Use Class C1); a 720sqm restaurant/public house facility (Use Class A3/A4); and 107 residential units (Use Class C3), together with reconfiguration of the existing commuter car park, and associated landscaping, car/cycle parking and ancillary works”. **The application was refused in March 2014.**

2002 – Full Planning Application (3049H/99/974)

- 4.11 A revised planning application for a five-storey office building of 11,574sqm was granted on 11 July 2002 (3049H/99/974). However, it is believed that this consent was never implemented, and has therefore expired.

1993 – Outline Planning Application (3049R/92/1404) and Reserved Matters (3049/AB/96/1706)

- 4.12 Outline Planning Permission was granted for the redevelopment of the former Ruston Bucyrus site for 8,130sqm of office floorspace (3049R/92/1404) in 1993. Reserved Matters were subsequently approved in April 1997 (3049/AB/96/1706) and the consent lawfully implemented by virtue of the construction of a mini roundabout on Freezeland Way.
- 4.13 An application for an additional floor to the above consented scheme (3049H/99/974) was refused planning permission on 12th July 2000. The applicants appealed this decision, which was subsequently dismissed by the Secretary of State on 30th January 2001, on the basis only that the appellants failed to execute a unilateral undertaking for a landscape mitigation scheme.

5 PRE-APPLICATION CONSULTATION AND SCHEME EVOLUTION

Overview

- 5.1 The applicant carried out pre-application consultation with the Greater London Authority (GLA), Transport for London (TfL), the Defence Infrastructure Organisation (DIO), and the Local Planning Authority (LPA); key stakeholders including local resident groups, the London Wildlife Trust, and the local community. The consultation approach responds to the advice laid out within the National Planning Policy Framework, 2019 (NPPF) and that is contained in LB Hillingdon's Statement of Community Involvement.
- 5.2 The pre-application consultation was carried out to gauge feedback and the opportunity for stakeholders to contribute to and shape the proposals. Full details pertaining to the consultation process are outlined in the Statement of Community Involvement which accompanies this application.

Determining Authority (Hillingdon Council)

- 5.3 A pre-application discussion was held with LB Hillingdon to discuss the principles of development and design prior to submission of the planning application. Initial feedback from officers confirmed that the principle of development is supported, although there was a requirement to assess the detailed design, density and quality of the development before accepting the scale of the development. Other planning considerations to review under further consideration included the parking provision.

Defence Infrastructure Organisation (DIO)

- 5.4 Consultations were also carried out with the DIO given the site's proximity to Royal Air Force Station Northolt. After a revision of the site proposal and design the DIO expressed that they did not have concerns with the building heights proposed.

Greater London Authority (GLA)

- 5.5 The applicant consulted with the GLA to discuss strategic issues with respect to principles of development, affordable housing, housing, urban design, inclusive access, sustainable development and transport. A summary of GLA feedback in respect of these issues is set out below.

Principle of development

- 5.6 Initial feedback supported the principle and scale of development, subject to detailed design and other planning considerations including the minimisation of north facing units and the provision of urban greening as a key narrative.

Affordable Housing

- 5.7 The proposal for 35% affordable housing by habitable room before subsidy is supported in principle, subject to agreement on affordable housing tenure mix.

Housing

- 5.8 On density, the GLA notes the site lends itself well to the creation of a new high-quality, high-density mixed-use neighbourhood, subject to demonstration that the full residential potential at the site has been optimised in order to maximise available land.

Urban design

- 5.9 The proposed layout principles are well supported. The GLA seeks to maximise active frontages and optimise ground floor interfaces between blocks whilst ensuring the number of single-aspect units is minimised. Minimal car parking is also encouraged.
- 5.10 The proposed height and massing strategy is considered to respond well to the site's context with the tallest elements along the northern edge and the lowest components lining the southern boundary of the site in closest proximity to the low-rise residential properties which front Freezeland Way.
- 5.11 The architectural features proposed are welcomed and should be incorporated across the scheme.

Inclusive access

- 5.12 London Plan policy objectives on inclusive access should be achieved. The scheme must demonstrate that 10% of units across the development, comprising a mix of unit sizes will be delivered as wheelchair user dwellings, the remaining units must be delivered to Building Regulation M4(2) specifications. The proposal should also achieve the highest standards of fire safety.

Sustainable development

- 5.13 The residential component of the scheme should achieve net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.
- 5.14 Proposals to incorporate urban greening measures as part of the development design should ensure that site levels are designed to allow Sustainable Drainage Systems (SuDS) strategy to function properly.

Transport

- 5.15 Proposals to retain the existing vehicular access junction on Freezeland Way and interventions proposed as part of the previous scheme at the site were considered acceptable subject to a Stage 1 Road Audit and swept path analysis being undertaken.
- 5.16 GLA officers noted that whilst the proposed ratio of car parking spaces at 0.3-0.35 spaces per residential unit accords with draft London Plan policy, there is potential to reduce car parking provision to encourage more sustainable modes of transport and fully utilise public transport connections.
- 5.17 In addition to the 3% of disabled car parking spaces proposed, it should be demonstrated on a plan as part of the Parking Design and Management Plan how an additional 7% of dwellings could be provided with a designated disabled persons parking space in future upon request.
- 5.18 Cycle parking is to be provided in conformity with the minimum standards for quantum outlined in the draft London Plan which is welcomed.
- 5.19 Proposals to incorporate new pedestrian routes through to the Green Belt land to the east of the site to help promote walking and cycling in the vicinity of the site are supported.

Transport for London (TfL)

- 5.20 The applicant consulted with TfL to discuss strategic issues with respect to site access, car parking, cycle parking, trip generation and modal split, public transport impact, highway impact assessment and traffic modelling, internal highway proposals, active travel zone assessment, walking, cycling, healthy streets and vision zero, construction, servicing, travel planning and MCIL. A summary of TfL feedback in respect of these issues is set out below.

Site Access

- 5.21 Feedback from TfL confirmed that the site access strategy is acceptable in principle, subject to relevant Stage 1 Road Safety Audits and swept path analysis being undertaken.

Car Parking

- 5.22 In line with the GLA's comments, TfL noted that whilst the proposed ratio of car parking spaces at 0.3-0.35 spaces per residential unit accords with draft London Plan policy, they would encourage a reduction of car parking provision as much as possible.

- 5.23 In addition to the 3% of disabled car parking spaces proposed, it should be demonstrated on a plan as part of the Parking Design and Management Plan how an additional 7% of dwellings could be provided with a designated disabled persons parking space in future if required.
- 5.24 Proposals to incorporate Electric Vehicle Charging Points (EVCPs) are welcomed and supported.

Cycle Parking

- 5.25 Cycle parking is to be provided in conformity with the minimum standards for quantum outlined in the draft London Plan which is welcomed.

Trip Generation and Modal Split

- 5.26 As a result of the trip generation assessment, TfL recommended that a 20% vehicle trip reduction is applied given that this would represent a good balance between policy mode share targets and proposed car parking supply, whilst still ensuring a robust impact assessment. The redistribution of these trips was also discussed to lower the pedestrian mode share. Proposals to revise trip generation were considered acceptable.

Public Transport Impact

- 5.27 TfL considered that given the increase in number of units and lower car parking ratio, which in turn resulted in an increase in the number of bus trips generated, it is expected that an increased contribution will be sought in the region of £800,000 to £1.5m.
- 5.28 TfL assumed that given proximity of the site to Hillingdon station, all trips would start/finish here. Upon review of the TA, TfL would determine if any mitigation against capacity would be sought.

Highway Impact and Traffic Modelling

- 5.29 No changes to the highway mitigation measures attached to the previous applications on the site are proposed. TfL therefore expected that since modelling was undertaken, demand in this area of the network may have changed. TfL therefore require baseline surveys to be undertaken to ensure that the network operation has not changed and that the modelling undertaken in 2017 is still valid. The input into the models should then be altered to reflect the updated baseline flows, as well as revised trip rates from the development.
- 5.30 It is noted that the site will be served by the 278 bus route from December 2019. TfL expect that this route would be run in the models in order to ensure that these reflect the current and future network demand.

Internal Highway Proposals

- 5.31 The proposed two-way loop road is to be treated as a shared space. TfL require that these spaces are legible and comfortable to use for visually impaired people through the design scheme. TfL recommended that sufficient kerb upstands should be outlined in the submission, in order to allow assessment on the acceptability of the proposals.

Active Travel Zone (ATZ) Assessment

- 5.32 The TA should include an ATZ assessment in line with TfL guidance to promote the Mayor's Healthy Streets approach.

Walking, Cycling, Healthy Streets and Vision Zero

- 5.33 TfL welcomed proposals to include a landscape public realm square in the south-western corner and additional pedestrian routes through the Green Belt land to the east of the site. The proposed design changes to existing road layout should be assessed against the 10 Healthy Streets indicators using the Healthy Streets Check for designers in order to ensure the development delivers improvements on the existing layout.
- 5.34 In line with the Mayor's Vision Zero aspiration, TfL strongly encouraged identification of any improvements to the road network, in order to reduce the likelihood of an accident.

Construction

- 5.35 TfL requires an Outline Construction Logistics Plan (CLP) to be submitted in support of the application, written in accordance with TfL's guidance. It is expected that the impacts of construction will be carefully managed, in order to ensure that highway operation, bus services and pedestrian movements remain unaffected during the works.

Servicing

- 5.36 Details on how the site will operate, including measures to rationalise and manage servicing activities should be included as part of a Delivery and Servicing Plan (DSP).

Travel Plan

- 5.37 TfL requires the production of a framework travel plan in accordance with TfL's guidance for travel planning.

Mayoral Community Infrastructure Levy (MCIL)

- 5.38 The development will be liable to pay MCIL2 as well as Borough CIL.

Stakeholder Approach

- 5.39 The applicant has engaged with the local community through meetings with local resident associations, including Ickenham Residents Association and Oak Farm Residents Association. A public consultation event was held on the 25th July 2019 to which the LPA ward members and the general public were invited. In addition to the public consultation event there was a consultation telephone line, website and email address available to the public to provide consultation feedback or ask questions.
- 5.40 The application will be subject to further consultation post-submission through the statutory consultation period afforded to planning application submissions.
- 5.41 Table 6.1 of the Statement of Community Involvement provides a summary of key issues and the applicant response.

Outcomes

Design and Housing Mix

- 5.42 The latest design revisions seek to address key issues raised by key stakeholders as detailed above. The buildings proposed have been orientated as to ensure the lowest potential levels of disturbance to residential amenity. A line of buildings on the site's northern and western edges helps to shield the site from noise and pollution, affords a sense of enclosure to the site and helps create the vehicular circulation route through the site.
- 5.43 35% tenure blind affordable housing will be provided with accessible housing provided in line with the emerging London Plan standards.
- 5.44 The commercial units within the site provide an active street frontage along Long Lane, while the landscaping along the ground floor residential units and undercroft parking creates a natural street scape. SuDs have been incorporated into the site.

Transport and Connectivity

- 5.45 A parking ratio of 0.3 has been achieved, aligning with emerging London Plan standards and the Mayor's Transportation Strategy (MTS). Parking will provide active provision for 20% electric vehicle (EV) spaces, with the remaining spaces having passive EV provision. There will be 20 accessible spaces onsite, inline with the emerging London plan targets.

- 5.46 The development will contribute to the forthcoming 278 bus service in an effort to increase public transport to the site. Pedestrian routes within the site will be well lit, overlooked and landscaped in order to encourage walking throughout the site on to/from public transport.
- 5.47 There will be 894 secure cycle parking spaces on site and cycle routes throughout the site out to surrounding roads and local cycle paths.
- 5.48 As required by TfL a Service and Delivery Strategy and Travel Plan have been provided with the Transport Assessment (TA). The TA outlines details for a CLP, expected to be secured by a condition once a principle contractor is appointed.

6 PROPOSED DEVELOPMENT

Overview

- 6.1 Hillingdon Gardens is proposed to be a residential-led mixed-used development that provides 514 new homes in the heart of the North Hillingdon Local Centre. The high-quality scheme will consist of one, two, and three-bedroom homes within a mixed-tenure neighbourhood. The development will be integrated into the surrounding setting, providing connections to local and regional greenways and enhanced access to local Green Belt land located adjacent to the eastern extent of the site. The development will provide a series of interlinked open spaces and gardens that filter through the site and into the surrounding areas.
- 6.2 The scheme will create a focal point and new landmark building that responds to and respects the surrounding environment while contributing to the sustainable regeneration of North Hillingdon and brings into use an underutilised brownfield site. The site will consist of 12 buildings situated strategically within the site to provide permeability and maximum amenity while accommodating the site constraints. The buildings on site will reflect the design principles of the surrounding architecture and include terraced houses, mansion blocks, park pavilions and a varied height scheme of two to eleven stories including stepping stone building features.
- 6.3 This section provides a high-level overview of the description of development and the core principles of the site and the landscape. This section should be read in conjunction with the Design and Access Statement and associated documents.

Quantum of Development

- 6.4 The table shown below provides an outline of the proposed quantum of residential development across the site:

Table 2: Proposed Quantum of Residential Development

Building	Number of Residential Units	Habitable Rooms
1	61	149
2	37	102
3	35	98

4	46	153
5	64	151
6	45	113
7	45	107
8	46	117
9	15	45
10	50	164
11	35	88
12	35	88
Total	514 Units	1,375 Habitable Rooms

Masterplan Vision and Principles

6.5 The architect and masterplanning teams have worked collaboratively to create a vision for the site that positively responds to the natural elements of the area, enhances the setting in which the development is located and mitigates the impacts of the site constraints. The scheme aims to deliver a vibrant mixed-use community that integrates the natural environment into the built form. There are six design principles of the site that have guided the development of the site:

- **Design Principle 1:** Create a focal point and a new landmark building that responds to the existing road junction.
- **Design Principle 2:** Open up the eastern edge to allow the park to filter through in to the site.
- **Design Principle 3:** Create a series of interlinked gardens and squares that draws the value in to the site.
- **Design Principle 4:** Create a buffer to deflect the noise from the adjacent motorway.
- **Design Principle 5:** Front Freezeland Way with lower scale houses to respond to the local character.
- **Design Principle 6:** Use the green links to connect the site to the wider area.

- 6.6 These principles provide a masterplanning framework to ensure the development is carefully designed to reflect the local environment and surrounding area. The proposed site layout, massing, and density provide an optimum level of site permeability while providing enclosure for residential spaces and buffering from the adjacent highway infrastructure. The site has been orientated north south to avoid single aspect dwellings and increase light throughout the development. Residential accommodation is provided in the form of duplexes and flats, offered within a mix of market and affordable tenancy types. Units located along the northern boundary of the site have been provided as oversized units, incorporating private amenity space that would have traditionally been provided as a balcony as additional floor area within each unit. This approach has been taken to ensure that these units are provided with adequate and comfortable accommodation adjacent to a more hostile edge. All units will benefit from additional private, shared outdoor amenity space.
- 6.7 Working within the framework set out by the design principles the 12 residential-led mixed-use buildings are set out as described in the following section.

Building 1

- 6.8 Building 1 is mixed- use and will include 368m² (GIA) of flexible commercial space (B1/A1/A3/D1) on the ground floor. The building is designed as a hinge block, fronting on to Long Lane as well as Freezeland Way. There is a commercial unit fronting on to Hillingdon Circus, providing an amenity gateway entrance into the site. There is a second commercial site that fronts Long Lane, providing an active street frontage to the site. At eight stories this building is proposed to be a landmark building, marking site within North Hillingdon Local Centre.
- 6.9 Building 1 provides 61 dwellings with residential units located on the first to seventh floors. The façade material will be primarily composed of brick with accented metal framing and reconstituted stone.

Buildings 2, 3 and 4

- 6.10 These buildings are situated along the western edge of the site, running parallel to Long Lane. As they front Long Lane, Buildings 2 and 3 have ancillary uses on the ground floor, this provides a level of protection from the road for residents. Building 4 is inward facing into the development and therefore hosts ground floor residential dwellings on the north side and a 217m² (GIA) flexible commercial space on the ground floor and 602m² (GIA) of commercial space (B1/A1/A3/D1) on the upper ground floor facing north, creating a commercial hub at the entrance of the site. Buildings 2 and 3 are both eight storeys, Building 2 provides 37 dwellings and Building 3 provides 35, while Building 4 provides 46 units with varied heights from 2 to seven storeys high, which includes duplex houses.

- 6.11 The façade of Buildings 2, 3 and 4 is primarily brick, accented with reconstituted stone and metal framing. The façade of the duplex housing that forms part of Building four is red brick. Balconies will be located on eastern elevation of Buildings 2 and 3 overlooking the internal podium garden space. Building 4 has balconies located on both the eastern and western elevation of the building.

Buildings 5 to 9

- 6.12 Forming the northern extent of the site these buildings are inward facing into the development, promoting a sense of enclosure and a neighbourhood feel. Each of the buildings overlook a central landscaped podium garden, under which the parking is located. The northern edge of the site runs adjacent to the A40 and will therefore not include habitable rooms that face the highway. These units have been designed as oversized units that include private amenity space.
- 6.13 Building 5 is 11 storeys and accommodates 64 dwellings. Building 5 is a landmark building on the north east corner of the site. This location is ideal for a taller building as it is situated both Long Lane and the A40; therefore, limiting impacts on adjacent uses as there are limited nearby amenities. The internal facing eastern and southern elevations each have residential balconies situated for sun exposure and overlooking the podium garden below. The façade of this building and the attached four-storey duplex housing consists of buff brick with reconstituted stone building accents and metal cladding and framing.
- 6.14 Buildings 6, 7, and 8 are each up to eight storeys. Buildings 6 and 7 accommodate 45 dwellings and Building 8 accommodates 46 dwellings. These buildings will each be stepped in height, with the southern elevation of each building stepped back at the sixth floor to soften the appearance of the buildings from the interior of the site and to provide a terraced space for residents. Each of the buildings have four-storey duplex housing situated between the eight storey buildings.
- 6.15 Consistent with the overall design of the site the primary facade material will be brick, and the duplex housing will be entirely buff brick with metal framed windows. The façade of the sixth to eighth stories of each of the buildings will be insulated metal panelling.
- 6.16 Building 9 is three storeys and accommodates 15 dwellings. Located in closer proximity to the adjacent Green Belt than the other buildings on the southern extent of the site, this building makes up the lowest building in the stepped-down approach to the open space beyond. The building has overhanging balconies on the eastern and southern elevation, overlooking the internal site and the neighbouring green space.

Building 10

- 6.17 At seven storeys tall Building 10 is entirely enclosed within the site, delivering 50 units. The building is situated centrally within the site and overlooks the heart of the development, Brewery Square. Balconies on the western and eastern elevation take advantage of the green space below, overlooking the amenity space within the site. The façade is primarily red brick with metal cladding finishing the seventh storey.

Buildings 11 and 12

- 6.18 These two buildings taper the development down five storeys to accommodate the adjoining Green Belt land. The primary façade is brick with an exterior steel frame that provides simple but outstanding detailing to the building face. Together these buildings provide 70 units.

Landscaping, Character Areas and Play Spaces

- 6.19 The scheme seeks to create a neighbourhood that reflects the surrounding natural environment and assimilates the built form into the wider landscape. Greening will be prominent throughout the site including central parklands that, high podium gardens partially enclosed by residential buildings and green streets to calm traffic across the development. Overall there will be 1.28ha of public landscape and natural corridors.
- 6.20 Existing green assets will be retained where possible to enable the development to integrate into the existing environment. A softer green edge will be created along the eastern extent of the site to draw the natural environment setting from the adjacent Green Belt into the site. Given the surrounding residential and amenity space, balconies are provided on all sides of the building.
- 6.21 The design team have identified six character areas within the site that will offer different amenities to residents. The character areas are described as follows:
- **Hillingdon Circus** provides a gateway to the site re-animates the corner of Freezeland Way and Long Lane with landscaping and planting to buffer the busy road and a gateway building to anchor the entrance to the site.
 - **The Approach** encompasses the primary pedestrian and vehicular access to the site. In this area the ground floor uses of each building will include mixed-use commercial space to provide active frontages and local amenity.
 - **High Gardens** provides private amenity space for residents to help create a sense of enclosure and privacy.
 - **Brewery Square** acts as a natural centre and heart of the development, drawing the landscape and natural ecosystems from the adjacent Green Belt into the site.

- **The Wander** areas are the east-west connections through the site that link the surrounding walking routes to the development. These routes are aligned with SuDs to sustain the natural drainage of the site.
- **The Meadow** is an existing green space to the east of the site that is rich in biodiversity. The development will seek to enhance this area and enable residents to have easy access to the natural amenity space.

- 6.22 There will be a hierarchy of play spaces on site that will provide formal and informal spaces for children. Formal play spaces will be located in the centre of the development while informal play spaces will be dispersed across the site, including doorstep play spaces for younger children.

Transport, Movement and Connectivity

- 6.23 While the site is bounded on three sides by main roads the development seeks to encourage travel to and from the site by public transport and active travel modes such as walking and cycling. As the local and strategic roads surrounding the site are constrained by traffic congestion, the nearby Hillingdon London Underground Station offers residents a close and convenient option for direct travel into central London via the Piccadilly and Metropolitan lines and westward via bus and coach services. The development will use a pedestrian focused design to ensure that the public spaces are central to the neighbourhood and employ active frontages along movement corridors to create a safe and interactive environment while incorporating enclosed semi-private and private spaces for residents.
- 6.24 Vehicles will enter the site via Freezeland Way then on to a central vehicle loop that enables access within the site through a core road network. This will provide access to each building for residents, servicing and deliveries, while limiting excessive vehicle traffic and preventing external through-traffic from using the site. 164 parking spaces will be provided across the site in centralised parking areas under podium gardens and additional on-street parking for residents and guests of the site. Parking spaces will be integrated into the site to avoid the appearance of a car-orientated development. Blue Badge parking will be provided in line with the draft London Plan standard of a 10% provision. Additionally, 20% of parking spaces provided will include active electric vehicle charging ports, while the remaining spaces will have passive electrical charging capability.
- 6.25 Pedestrian and cycle routes have been designed to ensure that they are integrated into the scheme for optimum accessibility, appropriately lit and overlooked for enhanced safety and linked to wider pedestrian and cycle routes to increase site permeability. Cycle access to the site will follow vehicular access along the central access loop with access and egress from Freezeland Way. There will be private cycle storage locations as well as on street cycle parking to provide secure and convenient cycle infrastructure to residents and their guests. Across the site there will be approximately 894 cycle parking spaces provided.

- 6.26 Those walking and cycling will be able to access the site via the main access route off Freezeland Way in addition to pedestrian access routes from Long Lane and the Green Belt land to the east of the site. There will be direct pedestrian access to Hillingdon Station from Long Lane. The site sits between two strategically important walking routes within Hillingdon. The site will provide access to both the Celandine Route and the Hillingdon Trail east-west pedestrian connections.

Energy and Sustainability

- 6.27 The energy strategy of the development will follow a Be Lean, Be Clean, Be Green hierarchy in order to reduce the development's energy impact. To achieve this the development includes design features such as energy efficient lighting and mechanical ventilation, water saving fixtures to target a limited consumption of 105L per person daily and building fabrics that exceed thermal performance threshold requirements.
- 6.28 There will be photovoltaic panels situated on roofs of the majority of the buildings on site, with the exception of the pavilion houses and terraced house. There will be an energy sub-station on site that will be located to the west of Building 2 and in the ground floor of Building 5.

7 PLANNING POLICY

Overview

- 7.1 The following section provides a summary of the planning policy context relevant to the consideration of this application.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) and Section 70(2) of the Town and Country Planning Act 1990 (as amended) require planning applications to be determined in accordance with policies contained within the Statutory Development Plan unless material considerations indicate otherwise. The determination of an application for planning permission is to be made in accordance with the Development Plan, unless material considerations indicate otherwise.

Material Planning Circumstances

- 7.3 Since the submission of the previous application August 2017, the revised NPPF has been published and updated in February 2019, replacing the previous 2012 and 2018 versions that were considered as part of the previous planning application submission. The NPPF is also supported by changes to the National Planning Practice Guidance.
- 7.4 At the strategic level, the draft London Plan has been submitted to the Secretary of State, with Examination in Public held between February and May 2019. The revised version of the plan with the Mayor's updated comments was published in July 2019. The adopted London Plan remains as part of the Development Plan currently, but the draft London Plan should be considered a material consideration in the determination of any planning applications.
- 7.5 LB Hillingdon have submitted their Local Plan Part 2 (LPP2) Development Management and Site Allocations document to the Secretary of State for Examination in Public, which was held in August 2018. The Proposed Main Modifications version of the Plan was consulted upon between March and May 2019, and the Council is anticipating the Inspector's Report imminently.

National Planning Policy

- 7.6 The following national policies and guidance are pertinent to the proposal:
- National Planning Policy Framework, 2019 (NPPF)
- 7.7 Paragraphs 7 and 8 state that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development has three overarching objectives; economic,

social and environmental. At the heart of the Framework is a presumption in favour of sustainable development. Developments should be approved without delay where they accord with an up-to-date development plan.

- 7.8 Paragraph 38 goes on to state that local planning authorities should approach decisions on proposed development in a positive and creative way seeking to approve applications for sustainable development where possible.
- 7.9 Paragraph 118 c) identifies that decisions should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”
- 7.10 Paragraph 118 d) also states that decisions should “*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more efficiently (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure.*”
- 7.11 Paragraph 145 identifies exceptions to inappropriate development in the Green Belt which include “the provision of appropriate facilities (in connection with the existing use of land or a change of use).....for outdoor recreation;.....as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it”.

National Planning Policy Guidance (NPPG)

- 7.12 The NPPG provides more detailed guidance to support policy set out in the NPPF. It offers further practical advice in terms of the application of planning policy in the following area of relevance to the proposed development:
- Conserving and enhancing the historic environment;
 - Flood Risk and Coastal Change;
 - Green Belt;
 - Health and wellbeing;
 - Housing and economic development needs assessments;
 - Housing and economic land availability assessment;
 - Housing supply and delivery;
 - Natural Environment;

- Noise;
- Open space, sports and recreation facilities, public rights of way and local green spaces;
- Strategic environmental assessment and sustainability appraisal;
- Travel plans, transport assessments and statements in decision-taking;
- Viability; and
- Water supply, wastewater and water quality.

Strategic Planning Policy

- 7.13 The London Plan was adopted in 2011 with consolidated amendments made in 2016 and provides strategic planning policy guidance for the London Boroughs. The London Plan has been analysed in Section 8 and in the relevant technical documents supporting this submission. This policy document is currently in the process of being replaced by the emerging draft London Plan.
- 7.14 The following strategic Supplementary Planning Guidance documents are also of relevance:
- Housing SPG (March 2016);
 - Affordable Housing and Viability SPG (August 2017); and
 - Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012).
- 7.15 The emerging draft London Plan has its Mayoral comments published in July 2019, addressing questions raised at the Examination in Public between March and May 2019. Relevant policies of the emerging consolidated draft London Plan have been analysed in Section 8.

Local Planning Policy

- 7.16 The Development Plan for Hillingdon Council consists of the following suite of documents:
- Hillingdon local Plan: Part 1 (LPP1) – Strategic Policies (November 2012);
 - Saved Unitary Development Plan Policies – Adopted as the Hillingdon Local Plan: Part Two (September 2007); and
 - The West London Waste Plan (July 2015).
- 7.17 Consideration has also been given to emerging policy documents including:
- Hillingdon Local Plan: Part 2 – Development Management Policies (Proposed Main Modifications Version) (March 2019);

- Hillingdon Local Plan: Part 2 – Site Allocations and Designations (Proposed Main Modifications Version) (March 2019); and
 - Hillingdon Local Plan: Part 2 – Policies Map (Proposed Main Modifications Version) (March 2019).
- 7.18 The LPA is in the process of the preparation of its Local Plan Part 2 Development Management, Site Allocations and Proposals Map documents, which will provide the overall policy direction for the Borough. Once adopted, the document will supersede existing saved UDP policies, currently adopted as the Local Plan Part 2.
- 7.19 The Local Plan Part 2 was submitted to the Secretary of State for Communities and Local Government on 18 May 2018. The hearing sessions for examination took place in August 2018. The Council received a post Hearing Advice Note from the Inspector on 30 November 2018 where various changes were proposed in order for the Plan to be found sound. Since then the Council released a consultation on these Proposed Main Modifications which finished on 8 May 2019. The responses to this are compiled before being reconsidered by the Inspector who will then issue a final report.
- 7.20 The application site is allocated as part of draft Policy SA 14: Master Brewer and Hillingdon Circus as Site B. The council deem residential-led mixed use development appropriate in this location. The site allocation policy also sets out the following criteria for the site:
- Development within the area should secure substantial planting and landscaping in association with any development;
 - Promote a mix of uses that takes advantage of the north/south and east/west communications network to serve Borough-wide and community interests;
 - Environmental improvements and landscaping as necessary to enhance the local shopping and residential environmental; and
 - Result in public transport improvements particularly North and South links.
- 7.21 Additional criteria within the policy wording includes:
- 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.
 - All proposals across Sites A and B should be of a scale that is in keeping with the Local Centre; and
 - Form a comprehensive development scheme across the site.

7.22 The Local Plan is also supported by Supplementary Planning Documents. The following adopted and emerging documents are of relevance:

- Planning Obligations SPD (July 2014);
- Land Contamination SPG (January 2014);
- Hillingdon Design and Accessibility Statement SPD (May 2013);
- Accessible Hillingdon SPD (May 2013);
- Affordable Housing SPD (2006);
- Noise SPD (2006);
- Community Safety SPG (July 2004); and
- Air Quality SPG (2002).

7.23 An application to establish a Neighbourhood Area and Neighbourhood Forum for Ickenham was approved by the Council on Thursday 15 December 2016. The site falls within the designated Ickenham Neighbourhood Plan Area boundary. In March 2019 the Ickenham Neighbourhood Forum (INF) released an update setting out the vision and objective for the emerging Neighbourhood Plan. The draft Neighbourhood Plan will be consulted again in due course however the timescale for the next stages are yet to be announced.

8 PLANNING CONSIDERATIONS

Overview

- 8.1 The purpose of this section is to draw out the key policy themes at national, strategic and local level in terms of the issues pertinent to the application site and its proposed redevelopment. The key relevant policy themes are:
- Principle of Development;
 - Quality of Proposed Accommodation;
 - Design;
 - Transport and Parking;
 - Environmental Matters; and
 - Amenity Provision and Landscaping.
- 8.2 The key policy references are provided for each theme (and associated topics), as well as a brief explanation of how the scheme complies.

Principle of Development

- 8.3 The appropriateness of a residential-led, mixed-use development at the site is clearly established through national, strategic and local policy.
- 8.4 At the heart of the NPPF and NPPG is the presumption in favour of sustainable development (paragraph 11, NPPF) which states that development proposals that accord with an up-to-date development plan should be approved without delay.
- 8.5 The NPPF promotes an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 117).
- 8.6 Paragraph 118 of the NPPF specifically identifies mixed-use schemes in the context of encouraging multiple benefits from both urban and rural land. Furthermore, paragraph 91 highlights the importance of mixed-use schemes in promoting social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other.

- 8.7 At the strategic level Policy 2.7 (f) of the London Plan identifies that in outer London improvements to the business environment should be prioritised through ‘enhancing the vibrancy of town centres through higher density, retail, commercial and mixed-use development including housing’.
- 8.8 At the local level the application site is allocated as an opportunity site within the LPA’s saved Unitary Development Plan (Saved 2007) Policy PR 23, which provides a broad framework for the type of development acceptable for the site. This policy is further supported by emerging Site Allocation policy ‘SA 14 - Master Brewer and Hillingdon Circus, Hillingdon (Site A and Site B)’, which identifies the site(s) as suitable for residential-led, mixed-use development. Additionally, LPP2 allocates the site as a Local Centre which provide a full range and choice of retail uses and local services for local people. Draft policy DMTC 3 protects and enhances the function of local centres by retaining uses that support their continued viability and attractiveness to the locality they serve.
- 8.9 The site is located in a built-up area of London with good access to public transport and services. The existing buildings associated with the Former Master Brewer Motel have long since been demolished leaving it vacant (but secured to prevent trespass) and as such is considered to represent a significantly underutilised site in this prominent and sustainable location. Due to its physical condition, location and existing built environment, the site is regarded as ‘brownfield land’ and suitable for a residential-led, mixed-use redevelopment.
- 8.10 Having established the principle of development we now provide commentary on the constituent parts of the scheme in the context of relevant planning policy.

Residential

- 8.11 The principle of a residential-led, mixed-use redevelopment coming forward at the site is well-established in the Development Plan. The London Plan promotes the utilisation of previously developed land (i.e. Policy 3.3). Draft Policy H1 Increasing Housing Supply of the emerging London Plan seeks to ensure that boroughs achieve their ten-year housing targets through the optimisation of housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially sites that have existing or planned public transport access levels (PTAL) of 3-6 or which are located within 800m of a station or town centre boundary.
- 8.12 The adopted Hillingdon LPP1 envisages future housing growth south of the A40 (Policy H1). Furthermore, the emerging policy set out in emerging Hillingdon LPP2 acknowledges the role of the site in securing significant residential development in the Borough (Policy SA14 Master Brewer and Hillingdon Circus – Site B).

- 8.13 There is a clear policy requirement at a national, regional and local level to provide new housing. Policy H1 of the draft London Plan also sets Hillingdon a ten-year housing target (net housing completions) of 15,530 dwellings / 1,553 dwellings per annum. This is a significant uplift in the requirement of Policy 3.3 of the adopted London plan that seeks a delivery of 559 dwellings per annum in Hillingdon.
- 8.14 The proposal to provide 514 residential units is entirely consistent with the identified housing requirement generally. Whilst the emerging policy, as currently worded, states that 125 new residential units should be provided on site, it should be noted that this quantum was proposed on the basis of the previous scheme (which incorporated a food store) and without the benefit of detailed design proposals being developed. The quantum of development proposed is considered to be acceptable given the revised additional dwellings target in the London Plan identified for LB Hillingdon and the opportunity to maximise density through good design.

Commercial Uses

- 8.15 The commercial space within the development will comprise of mixed-use flexible space that could include retail, food service or community uses. Retail space (provided as a flexible use class, A1/A3) would reinforce the vitality and viability of the North Hillingdon Local Centre by providing three new commercial units within a prominent and visible part of the site alongside new public realm. The proposed business space would make a modest yet useful contribution towards the identified target of 9,000 new jobs within the Borough.
- 8.16 This space is envisaged to offer flexible and affordable accommodation that could support a range of business uses (use class B1(a-c)). The provision of a modest amount of retail/commercial uses as part of a mixed-use scheme in this location is considered to be aligned with National and Strategic policy objectives for the promotion of competitive town centres and it is envisaged that the redevelopment of the site will enhance the vitality and viability of the Local Centre. Notwithstanding, it is considered that the proposal is of an appropriate scale so as not to cause harm to the existing function of North Hillingdon Local Centre.
- 8.17 Chapter 8, paragraph 91 of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places that promote social interaction, for example through mixed-used developments with strong pedestrian and cycle connections and active street frontages. The current London Plan supports bringing forward additional retail capacity where there is a local need (Policy 2.7, 2.15 and 4.7).

- 8.18 These uses are consistent with the LPP2 emerging site allocation (SA14) which states that the site should accommodate a residential led mixed-use site that contributes to the creation of a neighbourhood, provides a mix of uses and improves links to the area's main shopping centre, North Hillingdon. 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".

Summary

- 8.19 In summary, the proposal would represent a comprehensive redevelopment of the site and specifically the layout of the development has been designed so as not to prejudice the delivery of development on neighbouring land owned by the Council (adjacent to Freezeland Way) should this be made available for development.

Quality of Proposed Accommodation

- 8.20 The residential development proposed for the site is outlined in Section 6 of this document and in supporting planning drawings. In addition, the Design and Access Statement and other supporting material provide a full explanation of the approach taken with regard to the housing proposals.

Affordable Housing

- 8.21 In the current London Plan, Policy 3.11 and 3.12 states that the maximum reasonable amount of affordable housing provision should be sought when negotiating on individual private residential and mixed use-schemes. It also states that targets should be applied flexibly; taking into account, inter alia, site costs, the availability of public subsidy and other scheme requirements.
- 8.22 Within the London Plan, the aim is to ensure that Londoners have access to a wide choice of homes that they can afford which meet their requirements for homes of different sizes and types (Policy 3.8). In terms of tenure split, London Plan Policy 3.11 aims for 60% of the provision to be affordable rent and 40% intermediate housing.
- 8.23 The draft London Plan seeks for 50% of all new homes in London to be genuinely affordable, with major developments to deliver affordable housing through a threshold approach set out in Policy H6. This seeks a minimum of 35% provision of affordable housing onsite, with a tenure split of 30% low cost rented homes (either as London Affordable Rent or Social Rent), 30% intermediate products (including London Living Rent and London Shared Ownership) and the remaining 40% to be determined by the borough as low cost or intermediate homes.

- 8.24 Hillingdon's current Local Plan Policy H2 states that housing provision is expected to include a range of housing to meet the need of all types of households. LBH will seek to maximise the delivery of affordable housing from all sites. For sites with a capacity of 10 or more units, the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units. The policy supporting text sets an indicative target of 35% of all new units to be delivered as affordable. It also sets an indicative tenure mix of 70% social rented and 30% intermediate but notes that housing market conditions in Hillingdon are complex and a blanket approach will not be appropriate for all areas in the borough.
- 8.25 The emerging policy position at a local level in LPP2 at Policy DMH 7: Provision of Affordable Housing seeks to ensure the provision of affordable housing on sites with a capacity to provide 10 or more units. Subject to viability, a minimum of 35% of all new homes should be delivered as affordable housing, with a tenure split of 70% affordable/social rent and 30% intermediate.
- 8.26 Aligned with regional and local policy affordable housing guidance, the proposal seeks to provide 35% affordable housing, compliant with both regional and local affordable housing policies.

Housing Mix

- 8.27 Paragraph 61 of the NPPF states that the provision of a range of housing sizes available for different groups living in the community should be adequately planned for and the assessed need for affordable housing should be met onsite (para 62). The NPPF advises local authorities to effectively plan for the provision of affordable housing, stating that major decisions should expect a minimum affordable home ownership target of 10% (para 64).
- 8.28 This is reflected in Policy 3.8 and 3.9 in the London Plan which seeks to ensure that Londoners have access to a wide choice of homes that they can afford, and which meet their requirements for homes of different sizes and types. The London Plan requires new developments to offer a mix of housing sizes and types.
- 8.29 The draft London Plan seeks to ensure that schemes generally consist of a range of unit sizes, determined by evidence of local need or when this is not available, the range identified in the 2017 London Strategic Housing Market Assessment should be used to inform proposals.
- 8.30 Local policy is provided within Saved UDP Policy H4 which seeks to provide a range of housing sizes (where practicable) including units of one or two bedrooms. Within town centres predominantly one- and two-bedroom development will be preferable. Saved Policy H5 states that the Council will

encourage dwellings suitable for large families, to help address the shortage of larger homes in the Borough.

- 8.31 Emerging LPP2 at 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”. The site will comply with Policy DMH2 and with guidance set out in the Site Allocation SA14: Master Brewer Site, which states that the site should provide a range of housing types and tenures.
- 8.32 The mix of housing proposed across the development offers homes that range from one-bedroom flats to three-bedroom homes, with an average housing make up of:
- 52% One-bedroom, two people;
 - 17% Two-bedroom, three people;
 - 16% Two-bedroom, four people; and
 - 16% Three-bedroom, five people.

Density

- 8.33 The adopted London Plan sets out a density matrix related to setting in terms of location, existing building form and massing, and PTAL rating to use as a guide to determine appropriate density in an area. This approach has been removed from the draft London Plan, with the focus instead on determining the appropriate density for a site through a design-led approach.
- 8.34 Policy D1A Infrastructure requirements for sustainable densities still requires site density to be proportionate to PTAL ratings and connectivity and accessibility by walking and cycling. Policy D1B Optimising site capacity through the design-led approach requires the consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity.
- 8.35 LB Hillingdon set out in LPP2 a residential density matrix at Policy DMHB 17: Residential Density, where developments are expected to take account of the density standards set out in Table 5.3. The site is considered to be in an urban/suburban area categorised as an “Other town centre”, with an indicative upper density of between 200-510 habitable rooms per hectare or 80-170 units per hectare. It is however acknowledged in the policy pre-amble at paragraph 5.67 that LB Hillingdon will apply the (now-removed) density standards set out in the London Plan in a flexible manner.
- 8.36 The site’s density has been determined through a design-led approach, as per the requirements of the draft London Plan. This design-led approach has also taken account of the site’s location close

to Hillingdon London Underground station and other public transport connections alongside its location within Hillingdon District Centre to determine a density that both creates the best offering of housing provision and also takes advantage of the site's sustainable location and public transport connections.

Accessible Housing

- 8.37 Policy D3 of the draft London Plan states that development proposals are required to achieve the highest standards of accessible and inclusive design. The draft London Plan sets out at Policy D5 Accessible Housing that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. All other dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 8.38 LPP2 states at Policy DMHB 16: Housing Standards that in the case of major developments, at least 10% of new housing is to be accessible or easily adaptable for wheelchair users. The proposal seeks to comply with this requirement through the provision of the appropriate number of accessible or adaptable dwellings.
- 8.39 The development will provide accessible housing inline with the draft London Plan standards and in compliance with The Building Regulations Approved Document M, Category M4(3). The development will also incorporate inclusive access across the site.

Impact on Residential Amenity

- 8.40 Development is required to protect, and where possible seek to improve, the amenity of surrounding existing and future residents and building occupants, as well as the amenity of the surrounding public realm.
- 8.41 The London Mayor has set out minimum space standards for dwellings of different sizes which are based on the minimum GIA required for new homes relative to the number of occupants and taking into account commonly required furniture and the spaces needed for different activities and moving around. (Table 3.3, London Plan, 2016). The Mayor's Housing SPG (2016) further states that all dwellings should meet and where possible exceed these nationally described space standards (Standard 24). These standards are reiterated in the emerging Hillingdon LPP2 as Table 5.1, which replicates Table 3.3 of the London Plan (Paragraph 5.59). All units proposed within the development meet nationally described space standards.

- 8.42 Appendix A of the emerging Hillingdon LPP2 includes householder development principles that should be incorporated into development design to provide residential amenity. These principles include that adequate distances that should be maintained to any area from which overlooking could occur and as a guide (but also taking into account the character of the area) the distance should not be less than 21m between facing habitable rooms and windows and 24m from window to patio and door. This is further supported by Saved Policy BE24 which requires that new buildings should protect the privacy of occupiers and their neighbours.
- 8.43 The proposal suitably protects amenity through design and layout which inhibits overlooking of private spaces and habitable rooms; minimises and where necessary mitigates the impact of noise and air pollution with high-quality design and a high-level of urban greening; and does not result in the deterioration of sunlight or daylight or adversely impacts on visual amenity. The proposal achieves adequate separation distances between proposed buildings and also ensures a separation boundary of 10.5m from land located to the south of the site. Detailed amenity considerations are set out fully within the accompanying Design & Access Statement and Daylight and Sunlight Assessment.

Design Amenity Provision and Landscaping

- 8.44 As described earlier in the document, JTP is the masterplanning consultant for this development and carried out a number of design exercises to determine the best approach to the layout of the site. The aim was to achieve an appropriate residential density while creating an amenity that high-quality and protected from existing site constraints. The full layout of the site is detailed in the accompanying Design and Access Statement; however, the how the design approach complies with planning policy objectives is summarised below.
- 8.45 Policy at local, strategic and national level all state the importance of high quality, inclusive design that functions well and adds to the overall quality of the area. Policy 3.5 (Quality and design of housing developments) of the London Plan states that “housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London’s residential environment and attractiveness as a place to live”. This policy is further supported at the local level by Hillingdon LPP1 Policy BE1, which states that all new development should be of high-quality design supported by high quality public realm, which enhances the local distinctiveness of the area and contributes to community cohesion and a sense of place.
- 8.46 Policy 7.4 of the current London Plan further emphasises the need for buildings, streets and open spaces to be designed to a high-quality respond to local character, contributing to a positive

relationship between urban structure and natural landscape features. UDP Saved Policy BE3 states that new development should retain and utilise topographical and landscape features providing landscaping wherever appropriate.

- 8.47 Emerging Hillingdon LPP2 provides further detail in relation to the design of new development and identifies that new development will be required to be designed to the highest standards and incorporate principles of good design.
- 8.48 Policy GG2 of the draft London Plan– Making the best use of land, supports the redevelopment of brownfield land, and sites that lie within and on the edge of town centres, to create successful sustainable mixed-use places that make the best use of land. This policy also supports the application of a design-led approach to determine the optimum development capacity of sites, and the protection and enhancement of London’s open spaces included Green Belt land.
- 8.49 The draft London Plan Policy D1 provides a guideline for achieving high-quality design within London’s form and characteristics. Development requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planning supporting infrastructure capacity. This is supported by Policy D2 – Delivering Good Design, which states that masterplans should be used to help bring forward development and ensure that it delivers high quality design and place-making based on the requirements set out in Policy D1.
- 8.50 Draft London Plan Policy D7 – Public realm seeks to ensure that opportunities to create new public realm should be encouraged and explored where appropriate, and to ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.
- 8.51 The development has come into vision through a design-led approach, ensuring that high-quality housing was at the focus of the proposal. Buildings on site take a stepped approach to massing, with taller buildings situated on the western extent of the site where nearby uses are less sensitive. To respond to and respect the Green Belt beyond the eastern edge of the site buildings are tiered down to five-storeys adjacent to the open space beyond. The architecture that inspired the design of each of the buildings on site is reflective of local architecture. Using characteristics such as Mansard roofs, arched thresholds and defined bases on buildings across the site, architectural features found in development across North Hillingdon.

- 8.52 There will be 1.28ha of new landscaped amenity space on site, delivered through formal and informal play spaces, green and natural corridors and wandering spaces crossing the site. These high-quality public and private spaces provide residents and visitors inclusive, accessible and useful amenity space within their neighbourhood.
- 8.53 As described in Section 5, the application proposal has been subject to, and reflects, pre-application discussions held with representatives of the Council, the GLA and other technical bodies, resident groups and the local community. The scheme has been designed having regard to feedback received but has also been informed by the surrounding built context.

Townscape and Visual Impact and Impact on the Green Belt Setting

- 8.54 Chapter two of the NPPF outlines the presumption in favour of sustainable development achieved by fostering a well-designed and safe built environment with accessible open spaces (Ch 8), by protecting and enhancing the natural, built and historic environment (Ch 13, 15), and by making effective use of land (Ch 11).
- 8.55 There is a policy presumption at all levels in favour of the protection of Green Belt land against inappropriate development. Where development is proposed adjacent to Green Belt land, it is promoted that proposals should not injure the visual amenity by virtue of siting, materials, design, traffic or activities generated (London Plan Policy 7.16, LPP1 Policy EM2, UDP Policy OL5 and emerging Hillingdon LPP2 Policy DMEI 4).
- 8.56 The London Plan promotes the creation of high-quality development (Policy 3.5) that follow sustainable design principles (Policy 5.3) and urban greening (Policy 5.10) while responding to the local character of the area (Policy 7.4).
- 8.57 The draft London Plan favours the protection and retention of Green Belt land, as well as enhancement where appropriate. While the development is not proposing any development on Green Belt land it is located adjacent to a Green Belt Site. Policy G2 of the draft London Plan states that development proposals that would harm the Green Belt should be refused; however, the enhancement of it to provide appropriate use to Londoners should be supported. The development will open up the currently disused Master Brewer site, providing enhanced access to the Green Belt site.
- 8.58 The current Local Plan LPP1 Policy BE1 states that new development should be designed to be appropriate within the context of Hillingdon's urban form and make a positive contribution to the local

area. Policies EM2 and EM4 state that the Council will seek to protect the current extent of Green Belt land and enhance open spaces with new areas of vegetation.

- 8.59 Hillingdon's UDP saved Policy OL5 states the LPA will only permit proposals for development adjacent to Green Belt if the visual amenity of the land. Further, the emerging Local Plan LPP2 Policy DMHG 11 outlines the standards of good design expected of new development which includes harmonising with the local context and protecting valuable features, landscaping and biodiversity.
- 8.60 The proposed development is a design-led proposal that seeks to integrate into the surrounding mixed urban and green landscape. The site has been designed to maximize urban greening, enhance biodiversity and minimise impacts on the adjacent Green Belt. The proposed meadow approach to the east of the site enables the development to gradually integrate into the adjoining open space and create a soft, green boundary along the eastern edge of the site. The accompanying Townscape and Visual Impact Statement considers the relationship of the proposal to the adjacent Green Belt in visual and landscape terms. This assessment is based upon 18 viewpoints agreed with the Council and concludes that outside of the construction period of the development the immediate visual impacts on the physical landscape and townscape are negligible to minor.
- 8.61 The long-term impact on the physical landscape and townscape are considered to be beneficial as the trees on the site mature and the site contributes to the network of high quality connected open spaces and neighbourhood amenity.

Landscaping, Play Space and Amenity Provision

- 8.62 Hillingdon Gardens seeks to provide a 1.28ha of green amenity space across the development, providing a significant level of public and private amenity space. The provision of amenity space, place spaces, and landscaping are provided in the Design and Access Statement and the Landscape Masterplan and drawings, and a summary of policy compliance is provided below.

Amenity Provision

- 8.63 The NPPF paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction through the provision of mixed-use developments, accessible green infrastructure and community and public space. Paragraph 92 states that developments should plan positively for the provision of shared spaces.
- 8.64 Paragraph 127 of the NPPF outlines the ways in which planning policies and decisions should ensure that new developments contribute to well designed places. This includes the provision of high standard of amenity spaces for current and future users of the site.

- 8.65 Residential amenity standards are set out in Draft London Plan Policy D4 Housing quality and standards and the Mayor's Housing SPG (2016). Draft London Plan Policy D4 confirms "A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant". Additionally, "[T]he minimum depth and width for all balconies and other private external spaces should be 1.5m".
- 8.66 Policy DMHB 18: Private Outdoor Amenity Space in Hillingdon's LPP2 seeks to ensure that all new residential development will provide good quality and useable private outdoor amenity space in accordance with the standards set out within the policy wording.
- 8.67 The development proposes to provide 12,889m² of public amenity space as well as 493m² of private amenity space. The centralised green spaces within the site are a key feature, providing a link to the adjacent Green Belt land and the green corridors connecting to and from the site. Ground floor dwellings will have private amenity space which includes private cycle parking.

Landscaping

- 8.68 London Plan Policy 5.10, Urban Greening expects development proposals to contribute to urban greening, with features such as tree planting, green roofs and walls. Further, Policy 7.4 Local Character, seeks high quality design that contributes to a positive relationship between the urban structure and natural landscape features. The Hillingdon Gardens development seeks to connect with the existing Green Belt land to the east of the site's boundary and as such the layout and design of the site has been carefully considered to promote movement through the site towards this space.
- 8.69 London Plan Policy 7.5 Public Realm requires landscape treatment within the public realm, including street furniture and infrastructure, to be of the highest quality.
- 8.70 Draft Policies D1 and D7 of the draft London Plan and Paragraph 127 of the NPPF (2019) support the provision of high-quality landscaping as part of the public realm within new development. Landscape design and the quality of the public realm has been a central focus to the masterplanning and design evolution of the proposed development. The landscape masterplan sought to create a permeable and fully accessible public realm, comprising a series of interconnected spaces with a mix of high quality softscape and hardscape features.
- 8.71 Policy D1B Optimising site capacity through the design-led approach seeks to ensure that proposals provide conveniently located green and open spaces for social interaction and other activities.

- 8.72 As outlined in Section 6, the development scheme has defined six landscape character areas within the site, each with a unique landscape offer. A central green core will anchor the development into the wider public realm and provides visual connections to adjacent amenity spaces.
- 8.73 The key principles of the landscape masterplan for the site are to create:
- A hierarchy of spaces;
 - Promote connectivity and movement;
 - Implement green corridors; and
 - To integrate the natural landscape into the development.
- 8.74 The layout of the site has been proposed to maximise the available connections with nearby green space, as well as seeking to provide open space within the site boundary for the above purposes and is therefore considered to be policy compliant.

Play Space

- 8.75 Standards set out across the multi-level policy documents have guided the design of play spaces throughout the evolution of the development.
- 8.76 The current London Plan Policy 3.6 states that development proposals should make provision for play and informal recreation based on the expected child population of that scheme, including an assessment of future need. The Mayor's Shaping Neighbourhoods Play and Informal Recreation SPG for a minimum of 10 m² of play space per child.
- 8.77 Draft London Plan Policy S4 states that schemes that are likely to be used by children should increase the opportunity for play and informal recreation and incorporate good quality and accessible play provision for all ages, at least 10m² per child.
- 8.78 Hillingdon's LPP1 Policy EM5, Sport and Leisure states that development proposals should ensure that sufficient children's play space is provided for new residential development, in accordance with national and local guidelines.
- 8.79 Hillingdon's LPP2 Policy DMHB 19: Play Space seeks for new major residential developments to provide on-site play facilities. The policy states that any development that will result in the occupancy of ten or more children must provide children and young people's play facilities on-site. Further, a supporting statement within this document requires that larger housing developments provide at least 5m² of suitable formal play space on site, based on the child yield of the development as a whole. The Design and Access Statement provides full detail on the approach taken but it is understood that the proposal is policy compliant in this regard.

8.80 The development provides a hierarchy of formal and informal play spaces across the site. These spaces are thought to provide a range of options for children of different ages. Using the 'SPG play space requirement calculator' which allocates a GLA benchmark of 10m² of dedicated play space per child, a total of 2078m² play space is required. The development seeks to provide 2285m² of total play space area, including:

- 1157m² of dedicated formal and informal play area for children 0-5 years;
- 700m² of dedicated formal and informal play area for children 5-11 years; and
- 428m² of dedicated formal and informal play area for children 12 years and over.

8.81 The development provides a variety of play spaces totalling an amount of play space that is over the GLA benchmark requirements; therefore, the development is thought to be policy compliant.

Transport and Parking

8.82 The Transport Assessment submitted with this application outlines the transport proposals within the development on the transportation network and details how the development will mitigate impacts arising from the development and provide improvements to the transport system. The Transport Assessment accompanied by the Travel Plan and Service and Delivery Strategy set out the applicant's intention to support and promote sustainable travel to and from the site.

Highways Impacts

8.83 Chapter 9 of the NPPF: Promoting Sustainable Transport states that transport should be considered at the earliest stages of plan-making to ensure that the:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places. (paragraph 102).*

8.84 Paragraph 108 of the NPPF identifies that development proposals should take appropriate opportunities to promote sustainable transport, provide safe and suitable access for all users; and ensure any significant impact on existing transport networks can be acceptably mitigated.

- 8.85 Paragraph 109 states that development proposals should only be refused on highways grounds where they are assessed to have an unacceptable impact on highway safety or the cumulative impact on the road network would be severe.
- 8.86 The NPPF states that developments should prioritise pedestrian and cycle movements and provide high quality access to public transport, while creating a place that is safe, secure and attractive for all modes of transport (paragraph 110). The provision for those with disabilities and limited mobility should be provided for. Electric vehicle charging points provided at convenient locations should be included in the site design.
- 8.87 In line with the NPPF the site has been designed to promote sustainable travel via walking, cycling and public transport. The provision of parking for those with disabilities and restricted mobility, as well as electric vehicle charging points will be provided in line with the emerging London Plan standards.
- 8.1 The adopted London Plan supports new development that reduces the need to travel by private car and instead improves and promotes access to public transport and other sustainable transport methods. Policy 6.1 (Strategic approach) states that development proposals in locations of high public transport accessibility and/or capacity, which generate high numbers of trips, will be supported where it can be demonstrated that the proposal encourages travel by sustainable transport modes, in accordance with Policy 6.3 (Assessing effects of development on transport capacity).
- 8.2 Policy 6.3 states that development proposals should ensure that the development does not have an adverse impact on the capacity of the transport network nor should it adversely affect the safety of the network. The Traffic Assessment provided within this application highlights that the development is expected to have a minor impact on the safety of the network and an improved impact compared to the 2017 development proposal put forward for this site. Despite this, transport management plans have been proposed to ensure the development does not pose adverse impacts on the network and that sustainable travel modes are promoted from the inception of the development.
- 8.3 The draft London Plan states at Policy T1 Strategic approach to transport states that development should facilitate the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. All development should also make the most efficient use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes.

- 8.4 The Council aims to direct development to the most appropriate locations in order to reduce the impact on the transport network but also seeks to improve north-south public transport links in the borough as stated in Hillingdon LPP1 Policy T1 and T3.
- 8.5 Policy DMT2 from the emerging Hillingdon LPP2 details that development proposals must ensure that safe and efficient access to the highway network is provided to the Council's standards. There should also be no contribution from new development to the deterioration of air quality, noise for local amenity or safety for all road users. New development should also provide safe, secure and convenient access facilities for cyclists and pedestrians. Mitigation measures should be included to address any traffic impacts in terms of capacity and functions of existing and committed roads.
- 8.6 UDP Saved Policies AM1, AM2, AM7 and AM8 all require development to avoid negatively impacting on traffic congestion and quality of the environment and therefore promote development that is accessible to sustainable modes of transport.
- 8.7 The Transport Assessment shows that the number of car driver trips during the AM and PM network peak hours is less than was forecast as part of the 2017 site application, therefore no further traffic impact assessments were undertaken. The results of the 2017 Transport Assessment found the impacts on the network to be minor, and with the reduced parking offer, contributions towards improvements to public transport and improved pedestrian and cycle access through the site it is thought that the highways impact of the development will be lessened from the 2017 development proposal.
- 8.8 On-site measures will help lessen the impact of the development on the network. As outlined in the Transport Assessment, these will include the improvement of pedestrian and cycle connections, upgrades to nearby crossings and dropped kerbs to improve mobility access. In addition to these improvements, the bus stop on Freezeland Way is proposed to be widened to accommodate a shelter and the developer will contribute towards the operation of the forthcoming 278 bus service.
- 8.9 The proposed Travel Plan, Service and Delivery Strategy and the Car Parking Management Strategy will assist in mitigating the impacts of traffic coming to, from and travelling within the site.

Parking

- 8.10 London Plan Policy 6.13 seeks to reduce reliance on private car parking, providing maximum standards of car parking spaces. For one- and two-bedroom residential units the recommended maximum number of car parking spaces is less than one per unit, while three-bedroom dwellings have a maximum provision of 1.5 spaces per unit.

- 8.11 The draft London Plan Policy T6 outlines the car parking strategy for new development in London. Table 10.3 as part of Policy T6.1 Residential Parking sets a requirement of up to 0.75 spaces per dwelling in outer London areas of PTAL 3, not specifying the number of units in each dwelling. However, it does specify that where studios and one-bedroom flats make up a proportion of the development provision of car parking spaces across the development is less than 1.5 spaces per unit.
- 8.12 The Hillingdon LPP1 highlights that simple measures such as prioritising car parking for low emissions vehicles and car clubs can contribute to the reduction of harmful emissions and therefore developers should integrate some of these sustainable transport measures into development proposals. This will be expected to be demonstrated through the submission of travel plans (Paragraph 9.14).
- 8.13 LB Hillingdon set out in LPP2 that development proposals must comply with the parking standards outlined in Appendix C. For flats, this is a parking ratio of one space per unit for studio flats, one to 1.5 spaces per unit for one to two-bedroom flats, and two spaces per unit for three- and four-bedroom dwellings.
- 8.14 Pre-application engagement has been carried out with TfL, who were consulted on matters relating to car parking and cycle parking provision. This pre-application engagement has informed the level of car parking proposed with a ratio of 0.3 deemed suitable. One parking space will be provided for each three-bedroom unit, 0.45 spaces will be provided for two-bedroom units and one-bedroom units will be car-free.

Cycle Infrastructure

- 8.15 Paragraph 102 of the NPPF provides support the promotion of cycling, outlining that development proposals should encourage modes of sustainable transport including cycling, and should therefore provide sufficient cycle infrastructure and facilities.
- 8.16 Policy 6.9 (Cycling) of the adopted London Plan, which outlines the Mayor's ambition to increase cycling across London, which by 2026 shall account for 5% of all modal share. The London Plan provides additional guidance on the minimum cycle parking standards for new development. For residential dwellings (Use Class C3) parking requirements for long stay cycle parking are 1no. space per studio and one-bedroom units and two spaces for all other dwellings. Short stay cycle parking provision requires one space per 40 units. The Mayor's Housing SPG also requires individual and communal cycle storage to be secure, sheltered and well lit, with convenient access to the street (Standard 21).

- 8.17 The emerging London Plan retains a similar policy position that promotes the uptake of cycling with Policy T5 (Cycling) setting out that all developments should provide the minimum cycle parking standards (in line with Table 10.2), with all cycle parking fit for purpose, secure, well located and able to cater for larger or adapted cycles. Developments must also accommodate long and short stay bicycle parking spaces.
- 8.18 The development is considered to fully align with the emerging context of the draft London Plan by providing a complaint level of cycle storage and infrastructure, thus accommodating the needs of all future users of the site. To encourage cycle movements through and across the site, a number of new cycle ways will be provided across the site, connecting to and enhancing existing network routes.
- 8.19 Hillingdon's Saved UDP Policy AM9 promotes the provision of secure, attractive and adequate cycle parking facilities. Emerging Policy DMT5 reflects UDP Policy AM9, states that developments are required to ensure safe, direct and inclusive access for pedestrians and cyclists on the site and connections to the wider network. This policy emphasises the retention and enhancement of existing pedestrian and cycle routes, the provision of a high quality and safe public realm and separating well signposted and attractive pedestrian and cycle routes from vehicular traffic, where possible.
- 8.20 The development will provide 894 cycle parking spaces distributed across short-term lock up facilities and longer-term cycle parking structures. Cycle parking spaces will be provided in secure and sheltered easily accessible locations. A small number of cycle parking spaces will also be provided for the commercial and retail units. This will be provided in line with emerging London Plan requirements. Short-stay cycle parking will be incorporated into the public realm, strategically located in order to increase exposure and limit theft.

Service and Delivery

- 8.21 Paragraph 110 of the NPPF indicates that applications for development should ensure that the efficient delivery of good and services has planned for in the site design.
- 8.22 The current London Plan Policy 6.1 aims to promote the efficient distribution of freight while minimising impacts on the network. Policy 6.14 highlights that developments that generate high numbers of freight movements close to major transport routes should promote the uptake of the Fleet Operators Recognition Scheme, Construction Logistics Plans, DSPs and more innovative freight solutions.

- 8.23 The emerging London Plan (Policy T7) states that developments should facilitate sustainable freight and servicing through the adequate provision of service and delivery infrastructure. Delivery and Servicing plans should be provided for large developments to enable consolidation of services on site.
- 8.24 The Delivery and Servicing Plan provided with the application submission aims to ensure that servicing of the development can be carried out efficiently, without creating any negative impacts upon the local highway network, residents and commercial occupiers within and surrounding the site and the environment.

Environmental Considerations and Sustainability

Biodiversity and Ecology

- 8.25 Chapter 15 of the NPPF outlines the framework for conserving and enhancing the natural environment. Paragraph 170 states that planning decisions should seek to minimise the impacts on and provide net gains to biodiversity, subsequently; development proposals should help to improve local environmental conditions.
- 8.26 Policy 7.19 of the London Plan requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity as well as providing access to nature in areas deficient in accessible wildlife sites. Policy 7.21 requires existing trees of value to be retained as part of development and any lost as a result of development to be replaced.
- 8.27 The draft London Plan applies a similar requirement to enhance biodiversity by ensuring that new developments secure a net biodiversity gain through the creation of new ecological habitats in accordance with draft Policy G6 (Biodiversity and access to nature).
- 8.28 At a local level, UDP Saved Policies state the importance of nature conservation, enhancement and protection. Furthermore, it is identified that development proposals will only be permitted if they do not adversely affect the integrity of the biodiversity of the site (Saved Policy EC1, EC2, EC3 and EC5). Policy EM7 of the LPP1 states that Hillingdon's biodiversity will be protected and enhanced with special attention paid to Sites of Importance for Nature Conservation (SINCs) and sites with Metropolitan and Borough Grade 1 and 2 importance. The Policy states that the Council will expect the provision of biodiversity enhancements where feasible, including the provision of green roofs and sustainable drainage systems.

- 8.29 Local planning policy also requires the safeguarding, enhancement and extension of open spaces, informal recreational and environmental opportunities by maintaining existing trees and native vegetation and resisting the loss of open spaces, trees and woodland (Policy EM4, LPP1).
- 8.30 Policy DME17 of the emerging Hillingdon LPP2 requires the design and layout of new development to retain and enhance any significant existing features of biodiversity value within the site. Policy DMHB 11: Design of new Development states that all development should incorporate principles of good design, including landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- 8.31 Policy D7 Public Realm of the draft London Plan seeks to incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity. Similarly, Policy G5 Urban Greening states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site design, by incorporating measures such as high-quality landscaping (including trees).
- 8.32 Policy G6 of the emerging London Plan: Biodiversity and Access to Nature seeks to ensure that developments manage impacts on biodiversity and that they aim to seek net biodiversity gain. Proposals that reduce deficiencies in access to nature should be considered positively.
- 8.33 As part of the design development process, the appropriate investigative surveys have been carried out to gain an understanding of the biodiversity onsite and to determine what impacts (if any) the proposal will have, as well as opportunities for mitigation and net gain. The full details of the ecology and biodiversity on site and the potential impacts of development are provided in the Ecological Assessment submitted as part of the application package. Details of the proposed landscaping are contained within the Design and Access Statement and in the Landscape plan, both submitted with this application.
- 8.34 The woodlands on site were not found to meet the description of a UK Priority Habitat on account of the proportion of non-native species and their plantation nature and structure. No other habitats on site meet the criteria to be considered as UK Priority Habitats or Local BAP Habitats. The Site itself as a whole was considered to generally conform to the Local BAP habitat description: Wasteland.
- 8.35 A portion of the Site covering approximately 0.5 ha is located within Ickenham Marsh, Austin's Lane Pastures and Freezeland Covert (SINC) and therefore will be affected by the proposed development. It is understood that this area is to include landscaped areas and areas for biodiversity enhancements.

All other nature conservation sites in the area are considered to be separated enough from the site to prevent impacts from the development.

- 8.36 Of the protected species on site the Slow Worm was confirmed to be present on site. There was evidence of nesting birds and two trees were identified as suitable for roosting bats. There was the potential habitat on site for hedgehogs and the Stag Beetle and suitable foraging habitat for badgers although no evidence of them was found on site. There were two invasive species found on site: Butterfly Bush and Japanese Knotweed. Based on the assessment of the site it is considered unlikely to support significant populations of protected or notable species.
- 8.37 The potential presence of protected and notable species on Site means that they are a material consideration in the planning system through the NPPF and the Local Planning Policy (Hillingdon Local Plan: Objective S08 and Policy EM7; The London Plan: Policy 7.19).
- 8.38 With mitigation the impacts of development could be minimised; however, species-specific mitigation, avoidance, and/or compensation measures will be necessary to prevent such impacts.
- 8.39 The Ecological Assessment provides details of opportunities for biodiversity net gain within the proposed development, these include:
- Habitat enhancement and creation;
 - Species enhancement and Species Action Plans; and
 - Eradication of non-native species.

Archaeology

- 8.40 Chapter 16 of the NPPF outlines the framework in which to conserve and enhance the historic environment. Paragraph 189 states that local planning authorities should require development proposals to describe the significance of any heritage asset that may be affected by development. Paragraph 197 states that any impacts of a development proposal on non-designated heritage assets should be taken into account when determining an application.
- 8.41 The London Plan Policy 7.8 (Heritage assets and archaeology) of the London Plan seeks to maintain and enhance heritage assets and their settings and protects archaeological resources, landscapes and significant memorials. Emerging London Plan Policy HC1 states that development proposals should identify assets of archaeological significance and avoid or minimise harm.
- 8.42 Locally, the adopted LPP1 Policy HE1 states that the Council will conserve and enhance Hillingdon's historic landscape including archaeologically significant areas. Emerging policy in the Hillingdon

LPP2 (DMHB7) states proposals should ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed, or if that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works.

- 8.43 The Archaeology Desk Based Assessment submitted with this application concludes that there are no known archaeological finds or features within the site boundary and furthermore the site appears to have historically been low lying agricultural (meadow) land, which was unlikely to have been utilised for settlement purposes in the most recent historic periods.
- 8.44 The assessment is not able to conclude that there is sufficient information to rule out that no archaeological deposits can be anticipated within the site boundary. On the basis of the known archaeological finds and features within the defined study area, it is anticipated that any buried archaeological deposits relating to prehistoric to post-medieval activity, if present, would most likely comprise features and evidence of Local Importance. Given the prehistoric evidence located to the south of Freezeland Way, there is potential for archaeological remains of higher significance to be located within the site boundary.
- 8.45 In light of this there is potential for south of Freezeland Way, there is potential for archaeological remains of higher significance to be located within the site boundary. Therefore, the scope of the assessment and the proposed mitigation measures (by way of targeted evaluation) will ensure any archaeological interest will be satisfactorily recorded. Further details have been provided in the accompanying Archaeological Desk-Based Assessment.

Aviation

- 8.46 Saved UDP Policy A6 states that the LPA will not grant planning permission for development likely to interfere with the safe and efficient operation of Northolt airport. The RAF Uxbridge SPD (January 2009) identifies aviation safeguarding requirements for the RAF Uxbridge site due to its proximity to RAF Northolt, and states that, “any new developments will need to ensure there are no adverse impacts on the safe and effective operation of RAF Northolt.” The general form of the proposed town centre heights at the RAF Uxbridge site will be three to six storeys, and only buildings of exceptional design that respect RAF Northolt safeguarding issues and sustainability objectives will be permitted at five to six storeys and above. High rise development and new buildings will need to be sited and designed to ensure they do not pose a potential hazard or risk to aircraft utilising RAF Northolt or associated radar equipment, and this will apply to temporary structures such as construction cranes.

- 8.47 As set out in the Planning History section of this Planning Statement, technical advice was issued by the Defence Infrastructure Organisation (part of the MoD) confirming that there was no objection to the proposed heights of the emerging development or other safeguarding concerns, including the proposed Photovoltaic Panels. Updated further information was requested in relation to bird strike hazards and construction management, including the impact of cranes on the safeguarding zone. A Bird Hazard Management Plan and Outline Construction Management Plan has been duly prepared and submitted to support the application.
- 8.48 The submitted Bird Hazard Management Plan sets out the proposed design mitigation features to be followed, particularly in relation to roof features. It also contains details of a management regime to ensure that any on-going bird hazards are capable of being mitigated through on-going maintenance. As such this proposal would continue to allow RAF Northolt to operate in a safe and efficient manner in accordance with Saved Policy A6 of the UDP.

Air Quality

- 8.49 Paragraph 181 of the NPPF states that planning decisions should sustain and contribute towards with relevant limits and objectives for pollutants, with consideration for Air Quality Management Areas (AQMA). The development proposal is situated within an AQMA. Further, Paragraph 181 outlines that opportunities to improve air quality and mitigate impacts should be identified. These measures should be considered at the plan making stage to ensure a strategic approach to air quality management.
- 8.50 The NPPG states that air quality assessments should be proportionate to the nature and scale of the development, as well as the level of concern about air quality (para 007).
- 8.51 The current London Plan Policy 7.14 seeks to improve air quality, with development proposals minimising exposure to existing poor air quality and promoting sustainable design and construction to reduce emissions from the demolition and construction of buildings. New proposals should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality such as AQMAs.
- 8.52 Draft London Plan SI1 Improving air quality states that development proposals should not lead to a further deterioration of existing poor air quality or create any new areas that exceed air quality limits. In order to achieve this, Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality, with particular focus to developments within Air Quality Focus Areas.

- 8.53 At the local level, Hillingdon LPP1 further supports that development should not cause deterioration in local air quality levels; should ensure the protection of both existing and new sensitive receptors; and should demonstrate air quality neutrality within the AQMA (Policy EM8). The requirement for development proposals is further stated in the more recent emerging Hillingdon LPP2 Policy DMEI14.
- 8.54 LPP2 Policy DMEI 14: Air Quality states that development proposals should as a minimum be air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors both existing and new, and actively contribute towards the improvement of air quality especially within the Air Quality Management Area.
- 8.55 The Air Quality Assessment addresses the concerns raised by the Local Authority with regard to elevated pollution levels and the potential impact of additional road vehicle exhaust emissions. The Assessment looks at both the construction and operational phases of the development. Potential changes to local air quality as a result of the development in relation to UK Air Quality Objectives (AQO) and EU Air Quality Standards. Also, where required, the Air Quality Assessment considers mitigation measures to reduce the effect of the proposed development upon local air quality.
- 8.56 There is the potential for air quality impacts as a result of fugitive dust emissions from the site during construction. Sensitive receptor locations were located up to 500m from the site access route, with a 50m buffer from the road network. There were no sensitive ecological receptors found within 50m of the site so further ecological assessment was not undertaken. Based on the Assessment, sensitivity to potential dust impacts on the receiving environment was high due to dust spoiling; however potential human health impacts were found to be low during earthworks and construction and medium for trackout processes. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction and track out activities was predicted to be negligible.
- 8.57 Sensitive receptor locations were identified though a desk-top study During the operational phase of the development. Annual mean NO₂ concentrations were predicted across the development. Modelling indicated that there were exceedances of the AQO throughout the modelling area, but this the exceedance was only at one of the residential (unit G) with 41.55ug/m³. The location may be the back wall of the unit, and as such, it is considered that annual mean NO₂ levels at the development site should not be viewed as a constraint to development. Additionally, it is not predicted that concentrations will exceed the 1-hour mean AQO for NO₂ across the development site in the 2021 opening year scenario.

- 8.58 The Air Quality Assessment states that the development is considered to be suitable without the implementation of mitigation measures to protect future users against elevated NO₂ concentrations.
- 8.59 Modelling of the predicted concentrations of particulate matter (PM₁₀) across the development site found no exceedances of the AQO throughout the modelling area. As such, it is considered that annual mean PM₁₀ levels at the development site should not be viewed as a constraint to development.
- 8.60 Background levels of NO₂ and PM₁₀ are likely to be lower at elevated heights due to increased distance from emission sources, such as the local road network. Therefore, predicted concentrations at heights above ground floor level were considered to be acceptable in regard to pollutant exposure and were not assessed further.
- 8.61 PM_{2.5} impacts were not considered further in the Assessment as PM₁₀ concentration levels were between 20-25ug/m³ and are therefore unlikely to exceed PM_{2.5}.
- 8.62 The Air Quality Assessment recommends a number of best practices to further mitigate against air quality impacts in the construction and operational phase of the development, including measure already taken into consideration in this application. Table 5.6 in the Assessment outlines measures to limit air quality impacts during the construction phase of the development. During the operational phase, these include the implementation of EV charging ports, a travel plan, car club and green infrastructure and landscaping.

Noise

- 8.63 The site's location close to Freezeland Way, Long Lane and the A40/Western Avenue means that the surrounding area is subject to a significant level of traffic movement. The site also lies within a reasonable proximity to RAF Northolt. Whilst noise levels are somewhat softened by the existing vegetation on the site's boundary, measures as set out below have been taken in consideration of Noise SPD guidance on noise sensitive development, to ensure that future residents are not exposed to inappropriate levels of noise and pollution and that residential amenity is protected.
- 8.64 A noise survey and acoustic assessment has been carried out to ascertain the noise impact on future residents. The report evaluates the impact of noise from site generated road traffic. The most significant noise 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, but these affect the ambient noise levels to a lesser extent.

- 8.65 The assessment has carefully considered policy set out in the National Planning Policy Framework, the Noise Policy Statement for England (NPSE) and the Government's Planning Practice Guidance.
- 8.66 Paragraph 170 of the NPPF states that *planning policies and decisions should contribute to and enhance the natural and local environment by [...] preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of [...] noise pollution.*
- 8.67 Paragraph 180 requires that planning policies and decisions take into account the likely effects (including cumulative effects) of development and in doing so should:
- a) mitigate and reduce to minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; and
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.
- 8.68 The NPSE notes (para.2.7) that the application of the NPSE should enable noise to be considered alongside other relevant issues and not be considered in isolation.
- 8.69 The PPG sets out government guidance on the role of noise in the planning process. Of relevance to this scheme, it advises that *"Noise needs to be considered when...new developments would be sensitive to the prevailing acoustic environment"*. Whilst it does advise that noise can override other planning concerns, it states that as with the NPSE and the NPPF it does not expect noise to be considered in isolation from other economic, social and environmental dimensions of proposed development. It asks an LPA to consider whether or not:
- a significant impact is occurring or likely to occur;
 - an adverse effect is occurring or likely to occur; and/or
 - a good standard of amenity can be achieved.
- 8.70 The PPG says that for development, mitigation can be considered in terms of engineering (reducing noise at source, or containing it), layout (orientating the layout to minimise impact), conditions (the use of planning conditions) and mitigation to the dwellings themselves. Noise impacts can also be offset where residents have access to a quiet façade, a quiet external amenity space for their sole or shared use, or a public amenity space nearby.
- 8.71 London Plan Policy 7.15 aims to reduce and manage noise to improve health and quality of life and supports the objectives of the Mayor's Ambient Noise Strategy. Further to this the Mayor's Housing SPG requires that the layout of adjacent dwellings and the location of lifts and circulation spaces

should seek to limit the transmission of noise to sound sensitive rooms within dwellings (Standard 30).

- 8.72 The draft London Plan Policy D13: Noise outlines the ways in which development proposals should manage and mitigate noise impacts. This includes improving and enhancing the acoustic environment, promoting an appropriate sound scape for within the development. Development should seek to separate out noise generating uses, or where not possible use good acoustic design to mitigate potential noise impacts. New development should be insulated against existing noise generating sources and development should adhere to the Agent of Change Policy D12.
- 8.73 Hillingdon LPP1 Policy EM8 seeks to promote the maximum possible reductions in noise levels and minimise the number of people potentially affected in target areas as identified by the Defra Noise Action Plan. Additionally, UDP Saved Policy OE3/OE5 states that buildings or uses which have the potential to cause noise annoyance will only be permitted if the impact is mitigated within acceptable levels by engineering, layout or administrative measures.
- 8.74 The accompanying Acoustic Assessment has looked at specific methodologies detailed in BS 8233:2014 "Guidance on sound insulation and noise reduction for buildings", and "Guidelines for Community Noise- World Health Organisation". The Assessment sets out the acoustic performance required by glazing and ventilation to meet national guidelines (BS8233) for internal noise, during the day and the night for the updated scheme. Refer to the Assessment for further details.
- 8.75 The acoustic model indicates varying noise levels across the site, with noise levels being higher with closer proximity to the A40 and Long Lane. With appropriate glazing ventilation strategies put in place, the acoustic model shows that noise levels would meet BS8233 and World Health Organisation standards for residential space.
- 8.76 For outdoor balconies and gardens BS8233 advises noise levels should not exceed 50 dB $LA_{eq,T}$ with an upper guideline of 55 dB $LA_{eq,T}$. However, if quiet amenity space is provided nearby, this restriction may be partially off-set. While outdoor noise levels are not expected to exceed $LA_{eq,T}$ 55 there are quieter areas provided across the site that will be between $LA_{eq,T}$ 50 and 55 dB.
- 8.77 The Assessment found that while there will be an increase in traffic generated noise from the site it is expected to be negligible. Construction noise, while temporary, should be managed by a Construction Environmental Management Plan (CEMP).

Sustainable Design

- 8.78 National planning policy aims to support a low carbon future and to increase the use and supply of renewable and low carbon energy (Paragraph 148, NPPF). Draft London Plan SI2 Minimising Greenhouse Gas Emissions seeks to ensure that major new development will be net zero-carbon, though the reduction of greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the 'Be lean, be clean, be green' energy hierarchy.
- 8.79 At a local level Hillingdon Council aim to ensure that climate change mitigation is addressed at every stage of the development process by encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan (Policy EM1).
- 8.80 Government policies require significant energy reductions from buildings. The London Plan requires all major commercial developments to achieve a 35% carbon reduction beyond Part L 2013, and all residential developments to now be carbon neutral. Any cash in lieu required for compliance will be calculated assuming a carbon off-set price of £60 per tonne of carbon dioxide for a period of 30 years. An energy model of the development will inform the recommended sustainability features and calculate the CO₂ emissions reduction at the Hillingdon Gardens development from a base Part L 2013 compliant build. The passive design and energy efficiency measures to be incorporated within the design are features such as passive design, energy efficiency measures incorporating design features such as energy efficient lighting, occupancy and daylight sensing in relative areas, as well as the upgrading of 'U' values. The building will comply with Part L 2013 through energy efficiency and passive measures alone before the introduction of any renewable or low zero carbon technology.
- 8.81 It is anticipated that further measures will be considered that may be adopted as a means of reducing carbon emissions associated with the development; such measures include the use of construction materials that will be responsibly and legally sourced, as well as ensuring that all timber used is sourced in compliance with the UK Government's Timber Procurement Policy.
- 8.82 Local Plan Policy EM8 requires that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. It is anticipated that this will be achieved through the specification of water efficient sanitary fittings, such measures include dual flush toilets and low flow taps. This will help to further reduce the energy demand of the development as well as help to conserve water resources within the local area.
- 8.83 Flood maps sourced from the Environment Agency highlight that the majority of the development is located within Flood Zone 1 and is at low risk of flooding from fluvial sources.

- 8.84 Local Plan Policy T1 will steer development to the most appropriate locations in order to reduce their impact on the transport network. The development is located North East of Uxbridge and as such is within walking distance of a number of public transport nodes (including Hillingdon Station), as well as a range of primary local amenities such as postal services and cash points. These features combine to create an inherently sustainable location for the proposed development and reduce the need for car-based travel and transport-related pollution.
- 8.85 The incorporation of these sustainability measures allow for the proposed Hillingdon Gardens development to be deemed sustainable whilst targeting compliance with local and national policy.

Flood Risk and Drainage

- 8.86 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (Paragraph 155). To support this, the London Plan Policy 5.12 states that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF. Additionally, developments which are required to pass the Exceptions Test (as set out in the NPPF and the Technical Guidance) will need to address flood resilient design and emergency planning.
- 8.87 Hillingdon LPP1 Policy EM1 seeks to ensure that climate change mitigation is addressed at every stage of the development process by locating and designing development to minimise the probability and impacts of flooding, requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption. This is further supported by emerging Hillingdon LPP2 Policy DMEI9, which states that development proposals in flood risk zones 2 and 3a (medium and high probability risk) and areas identified as being at risk from artificial sources, sewer and surface water flooding and ordinary watercourses or historic flood events will be required to submit an appropriate level Flood Risk Assessment (FRA) to demonstrate that the development is resistant and resilient to all relevant sources of flooding. Furthermore, UDP Saved Policy OE8 states planning permission will not be granted for new development or redevelopment of existing urban areas that would result in an increased flood risk due to additional surface water run-off, unless the proposed development includes appropriate attenuation measures to a standard satisfactory to the council.
- 8.88 The proposed development buildings are to be used for residential, retail and commercial purposes at ground floor level. The Flood Risk Assessment prepared in support of this application identifies that all of the development site lies within Flood Zone 1, which has a low probability of flooding (less than 1 in 1000 annual probability of flooding of river or sea flooding in any year).

- 8.89 An assessment of all potential sources of flood risk has been carried out including coastal; drains and sewers; groundwater; overland surface water; and reservoirs. It is considered that there is a low risk of flooding to the site from these sources, without any flood reliance / flood resistance measures in place.
- 8.90 Safe access and egress has been considered for the development with the site being suitable for safe access and egress to be gained. This would be achieved through an increase in the height of the access routes, which will be raised by at least 300mm above the general low-lying areas of the site.
- 8.91 The surface water run-off is to be managed so it conforms to The London Plan Paragraph 5.13, and Sustainable Design and Construction Supplementary Planning Guidance (SPG) produced by the Greater London Authority.
- 8.92 Accordingly, in flood risk terms the development is considered acceptable and does not increase flood risk or detrimentally affect third parties. The surface water management of the post development site adheres to all current regulations and therefore in flood risk and drainage terms the proposed development is considered acceptable.

Contamination

- 8.93 New development should be fit for its location taking account of ground conditions and any risks arising from instability and contamination as stated in paragraph 178 of the NPPF. To support national planning policy, Hillingdon LLP1 Policy EM8 requires major development proposals to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill. Similarly, emerging Hillingdon LPP2 Policy DME12 requires any land contamination issues to be adequately assessed and, if required, the site to be safely remediated to ensure development can be made suitable for its proposed use.
- 8.94 A Preliminary Risk Assessment in respect of contamination has been prepared to accompany this planning application. This report is designed in accordance with 'the Model Procedures for the Management of Land Contamination (CLR 11)', the relevant requirements of national planning policy (NPPF) and Planning Practice Guidance (Land Affected by Contamination). Potential sources of off-site contamination have been identified on site and include a railway, railway sidings, a works and a garage. Ground conditions either comprised of Made Ground or concrete over sandy gravel.

- 8.95 There is considered to be limited potential for historical sources of contamination off-site; however, these are not considered to represent a significant risk, given the distance of the contaminants from the site and absence of detectable significant contamination.
- 8.96 Nevertheless, considering the proposed residential-led use of the site, its historic commercial/industrial use and the presence of existing contamination, the overall risks posed to Human Health or controlled waters are considered to be low and any potential risks can be addressed by appropriate mitigation measures identified within the Assessment and secured by a planning condition.

Daylight, Sunlight and Overshadowing

- 8.97 As a part of the development proposal for the Hillingdon Gardens site an assessment of Daylight and Sunlight (DLSL) Assessment was carried out. This section provides an overview of how the proposal meets the policy requires using the results of the DLSL Assessment.
- 8.98 Currently there is no specific legislative framework relating to developments and their potential effect on daylight and sunlight. When considering development proposals, it is normal to have regard to 'Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice (Second Edition)', published by the Building Research Establishment (BRE Guide). Additionally, there is an emerging standard, the European Daylight Standard, EN 17037:2019, however due to Britain's planned exit from the European Union, there is uncertainty of whether this standard will be adopted by local authorities in the country. For this reason, the DLSL Assessment focusses compliance on the BRE Guide which is widely adopted as policy.
- 8.99 The current London Plan Policy 7.6 Architecture, states that that all buildings must not cause an unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings including the effect of overshadowing. Further, Policy 7.7 states proposed tall buildings should not have an adverse impact on their surroundings in relation to any unacceptable overshadowing.
- 8.100 Draft London Plan Policy D4, Housing Quality and Standards states that development proposals should demonstrate that sufficient daylight and sunlight can be delivered to all new residential uses and show that the proposal will not be to the detriment of existing and surrounding residential units.
- 8.101 The areas of study of external impacts in the DLSL Assessment include residential properties in proximity to the development, specifically the habitable rooms that are considered closest to the development. As the nearest residential receptors lie significantly below the 25-degree angle as

recommended by the BRE Guide, all daylight and sunlight impacts to the properties comply fully with the aspirations of the BRE Guide as is proven by the analysis.

- 8.102 The analysis of internal daylight and sunlight levels within the proposed development was undertaken in the DLSL Assessment. All buildings were assessed and found to be in compliance with the daylight and sunlight aspirations of the BRE guide. There were, however, a number of shortfalls identified, namely in relation to window positioning, adjacent massing within the development, and/or where windows face away from due south. Despite these shortfalls, the Assessment states that the design is supportable as any derogations are consistent with development in that location.

9 COMMUNITY INFRASTRUCTURE LEVY & SECTION 106

- 9.1 The draft Heads of Terms to feed into any S106 Agreements will be discussed in further detail with statutory consultees and the Local Planning Authority during the application's determination period.
- 9.2 Similarly, all Community Infrastructure Levy contributions will be agreed upon during the application's determination period.

10 CONCLUSION

- 10.1 This planning statement supports the application of a residential-led mixed-use development described as the:

“Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (164 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development”

- 10.2 This application follows the submission of a full application submitted in 2017 (4266/APP/2017/3183) which was refused for the construction of a residential-led, mixed-use development comprising buildings between 4 and 9 storeys to provide 437 residential units; employment floorspace (Use Class B1(a-c)); and flexible commercial floor space.
- 10.3 The Master Brewer site has been vacant for over a decade, in which time it has been subject to further applications for development, including hybrid planning application in February 2014 for Full and Outline planning permission for a mixed-use development comprising the erection of a food store, measuring 3,543 m² (GIA) (Use Class A1); 3 retail units totalling 1,037 m² (GIA) (Use Class A1 to A5); a 70 bed hotel (Use Class C1); erection of 125 residential units (Use Class C3) and associated highways alterations together with landscape improvements (application reference numbers: 4266/APP/2014/518 and 519). The 2014 application was resolved to grant planning permission, subject to the completion of a Section 106 (s106) Agreement. Although consent was secured in principle, the application was subsequently marked as 'No Further Action' by the Local Planning Authority as no s106 agreement was completed.
- 10.4 The Applicant's vision to bring forward a residential-led mixed-use scheme in this location is supported in principle by both the LPA and the GLA and is aligned with the site allocation SA14 site B in the emerging Local Plan LPP2. Developing a high-quality, design-led residential community that is integrated with the surrounding natural landscape aligns closely with the Council's emerging aspirations to see sustainable housing growth within the strategic site allocations across the borough. Given the site's location within North Hillingdon Local Centre; relative separation from the surrounding built environment; and its proximity to local amenities, services and public transport, a higher density proposal is supported and promoted. The level of residential development proposed (514 units) will represent a significant and valuable contribution to local housing supply.
- 10.5 Through consultation with stakeholders such as Hillingdon Council, the GLA, TfL, the DIO and local community groups the design of the development proposal has evolved to align with relevant policy

and incorporate local and regional aspirations for the site. The site has been designed to protect residents from site constraints and enhance the surrounding natural environment by increasing and improving access and providing green corridors for pedestrian and cyclists through the site. The proposal will enhance the appearance of the site and be a positive contribution to the North Hillingdon.

- 10.6 The residential-led mixed-use nature of the site means that jobs will be created within the North Hillingdon Local Centre which will serve the current and future community, without detracting from the nearby town centre uses. The increase in residential amenity in the area will contribute an increase in local economy through increased footfall, trade and community vibrancy.
- 10.7 This application has been supported by specialist technical reports, which have demonstrated that the Hillingdon Gardens proposed scheme poses limited impacts to the local and natural environment, that will be overcome with appropriate mitigation measures.
- 10.8 Given the results of the various technical reports that support this application, in addition to the ways in which this application is compliant with local, regional and national policy, is aligned with policy aspirations for the site and has support in principle from the affected stakeholders, it is reasonable to conclude that this planning application be assessed and approved without delay.

Appendices

APPENDIX A: Proposed Site Plan

APPENDIX B: Drawing Schedules

APPENDIX C-1: GLA pre-app comments

APPENDIX C-2: TfL pre-app comments

APPENDIX C-3: Hillingdon Council pre-app comments

