

Planning Statement – Temporary Works for Greenway Sewer Diversion Southern Site

May 2021

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1 Introduction

- 1.1 This document is in support of a planning application relating to enabling work for the re-routing of a small section of sewer network at The Greenway, off High Road, Ickenham, at approximate Grid Reference TQ0809586654, as part of the enabling works for the HS2 railway.
- 1.2 Thames Water Utilities Limited (Thames Water) is the statutory sewerage undertaker for the London Borough of Hillingdon. As a statutory sewerage undertaker Thames Water has a duty to provide, improve and extend a system of public sewers and to make provision for the treatment of sewage under the Water Industry Act 1991. As part of the enabling works for the HS2 railway, Thames Water are required to assess their assets which may be affected.
- 1.3 Diversion of a section of an existing below ground sewer is required, which is a key part of the wastewater network serving the surrounding area. The sewer passes underneath the route of the Marylebone to Birmingham railway line (Chiltern Main Line) and requires diversion to avoid being impacted by the HS2 works, which include a portal required to bring the HS2 rail line from underground to above ground at this location.
- 1.4 This sewer diversion work is essential to ensure that Thames Water continues to provide wastewater services to residents in the surrounding area in its capacity as a statutory undertaker, and Thames Water has therefore designed this diversion.
- 1.5 Whilst the required works to the north of the railway line constitute permitted development under the Town and Country Planning (General Permitted Development) Order 2015, this application relates to the works south of the railway line, for which Thames Water is seeking planning consent, comprising: temporary modifications (widening) to the existing construction access adjoining Ickenham High Road on the southern side of the railway; a temporary southern working compound; temporary access track between High Road and the southern compound location; a temporary welfare compound; and a temporary bridge for a watercourse crossing.
- 1.6 This document provides a description and assessment of the proposals and relevant topics. The following are appended in support of the application:
 - Appendix A - Heritage Statement
 - Appendix B - Construction Logistics Plan for Temporary Site Access
 - Appendix C - Ecology Report
 - Appendix D - Stage 2 Tree Survey Report: Mains Work
 - Appendix E - Statement of Community Involvement
 - Appendix F - Geo-Environmental Interpretative Report (GIR)
 - Appendix G - Ground Investigations Factual Report
 - Appendix H - Geotechnical Report
 - Appendix I - HS2 Code of Construction Practice (CoCP)
 - Appendix J - Design and Optioneering Report
 - Drawings:
 - 01 - J923_01-AJ-TS001304-101-DR-P-0010 - Site Location Plan
 - 02 - J923_01-AJ-TS001304-101-DR-C-0036 - Site Plan Existing
 - 03 - J923_01-AJ-TS001304-101-DR-C-0037 - Existing Access
 - 04 - J923_01-AJ-TS001304-101-DR-C-0030 - Site Plan Proposed
 - 05 - J923_01-AJ-TS001304-101-DR-C-0031 - Site Plan A (1:200)
 - 06 - J923_01-AJ-TS001304-101-DR-C-0032 - Site Plan B (1:200)
 - 07 - J923_01-AJ-TS001304-101-DR-C-0033 - Site Plan C (1:200)
 - 08 - J923_01-AJ-TS001304-101-DR-C-0034 - Temporary Works Plan
 - 09 - J923_01-AJ-TS001304-101-DR-C-0035 - Visibility Splay and Hoarding

- 10 - J923_01-AJ-TS001304-101-DR-C-0003 - Long-Section
- 11 - J923_01-AJ-TS001304-101-DR-C-0002 - Utilities Plan
- 12 - H582_05-HI-TS001304-101-DR-C-0147_P02 - Bridge Plan and Elevation and plan (Reference Design)
- 13 - H582_05-HI-TS001304-101-DR-C-0111_P02 - Indicative Access Section (Reference Design)
- 14 - H582_05-HI-TS001304-101-DR-C-0142_P04 - Shaft Section 1 (for information)
- 15 - H582_05-HI-TS001304-101-DR-C-0122_P05 - Shaft Section 2 (for information)
- 16 - J923_01-AJ-TS001304-101-DR-C-0051 - Habitat Plan
- 17 - Landscape Plans

2 Application Site

- 2.1 The application site is on the north side of High Road, Ickenham in the area between Oak Avenue and The Green, extending north west and covering the allotments to the west of Ickenham Stream.
- 2.2 The application site area includes the existing gravel hardstanding access track from High Road, Ickenham, and a small area of amenity grass to the north east which is enclosed by a foot rail. This area of grass, which also contains a dog foul bin, a general litter bin and a seating bench, separates the existing access road from the car parking area for the Soldiers Return Public House. A small raised bed is present immediately adjacent to the High Road, Ickenham, between the existing access and the access to the Soldiers Return Public House. The modified access road will provide a link between High Road, Ickenham and the compound area behind the Public House for the sewer diversion works, and a further access track will link to the second compound on the north west part of the site which is currently in use as allotments.
- 2.3 To the south west, the site is partly bordered by an area enclosed by temporary hoardings. Planning permission was granted for residential development in this area by Hillingdon Council on 12th December 2016 (ref: 51656/APP/2014/4334) and it is understood that this consent has expired. The existing access track forms part of The Hillingdon Trail, a 20-mile path from Cranford in the south-east to Harefield in the north-west. The small area of amenity grass includes a number of trees, as identified in the enclosed Tree Report (Appendix D).
- 2.4 The land within the application site is in council ownership (registered under title AGL197570 to the Mayor and Burgesses of the London Borough of Hillingdon). The area is not subject to any ecological or landscape designations. High Road, Ickenham is a Classified B Road.
- 2.5 The site is located within Registered Common Land which includes the allotment area, council-owned woodland and the open space areas adjacent to the Soldiers Return Public House. The main working compound will be located within the allotments, and another smaller compound behind the Public House, providing ancillary and welfare facilities.

3 Permitted Development Rights

- 3.1 The majority of the sewer diversion works (other than a small section where the route crosses beneath the railway) are outside of the limits of the HS2 Act (i.e. outside of the HS2 site boundary). The diverted sewer will be entirely below ground level and, as such, this aspect of the scheme constitutes permitted development under Part 13, Class B (a) of the Town and Country Planning (General Permitted Development) Order 2015 (GPDO), as: “development not above ground level required in connection with the provision, improvement, maintenance or repair of a sewer”.

3.2 Compounds on land adjoining the main works would also constitute permitted development under Part 4, Class A of the GPDO, as: "The provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land". However, the section of temporary access track between the proposed compound behind the Soldiers Return Public House and Ickenham High Road does not constitute permitted development under Part 2, Class B of the GPDO - "The formation, laying out and construction of a means of access to a highway which is not a trunk road or a classified road, where that access is required in connection with development permitted by any Class in this Schedule". This aspect of the development therefore requires a planning application under the Town and Country Planning Act 1990, due to the modification of an access to a classified road – High Road, Ickenham (B466).

4 Proposed Development

4.1 To enable the sewer diversion works, temporary compounds will be required on the land occupied by allotments and on the open space area to the north-west of the Soldiers Return Public House. The reception shaft and temporary working compound will be situated on the land occupied by allotments, with most of the works along the south-western boundary of this area. Site offices, welfare, parking, wheel washing equipment and other facilities will be located within a second temporary compound in the open space area to the north-west of the Soldiers Return Public House. The site compounds will be accessed via an existing access off High Road, Ickenham, to the west of the Soldiers Return Public House, which will need widening and improving. This temporary access route will pass through the wooded and open space areas behind the public house, across the Ickenham Stream via a temporary bridge, and will then adjoin the area of land currently occupied by allotments.

4.2 This temporary work is not permitted under Part 2 Class B of Schedule 2 of the GPDO as it involves the formation, laying out and construction of a means of access to a highway which is a classified road. The application site area includes the two temporary compound areas, the temporary access track and temporary bridge, as shown in the enclosed Site Plan (J923_01-AJ-TS001304-101-DR-C-0030). Through discussions between Hillingdon Council and the construction contractor, efforts have been made to minimise the site area and to use only a portion of the allotment area, meaning that not all allotment plots will be occupied by the construction works, as can be seen on the site plan.

4.3 The proposed works consist of –

- **Site working compound and welfare compound areas** - The working compound area will be located within the area currently occupied by allotments and will include temporary storage of soil. Site offices, welfare facilities, deliveries, parking, and wheel wash facilities will be accommodated within the open space area behind the Soldiers Return Public House.
- **Widened and modified existing access off High Road** - The existing track to the south-west of the Soldiers Return Public House will be widened and modified to enable safe access and egress by construction vehicles. The proposed modifications consist of the altering of the kerb lines to facilitate the site entrance, with the existing services that cross the footpath to be supported by reinforcing with steel plates. The main vehicle gates, accessed via biometric sign-in, will be set back along the access track, as shown on the Site Plan (J923_01-AJ-TS001304-101-DR-C-0030). The existing access is in close proximity to the access into the car park of the Soldiers Return Public House, and there will be a highway crossover with the proposed widened access and the public house car park access.

- **New section of temporary track through the woodland into the allotments** – A temporary access track to the working compound from Ickenham High Road will allow construction vehicles to access the storage and working areas.
- **A temporary bridge over the Ickenham Stream** - A temporary bridge will be required over the Ickenham Stream, as the existing bridge is not suitable for construction traffic.

4.4 The diverted sewer is to be constructed entirely below ground at a depth of approximately 10 metres below ground level. The temporary site compounds, working areas and access tracks are to be removed on completion of construction and any affected land, including the allotments, is to be reinstated to its original condition. The development will not therefore be visible at ground level and any potential impacts will be temporary in nature and confined to the construction phase. Details of the impacts of the proposals and intended mitigations are discussed later in this document under each relevant topic, as well as in the appended reports.

4.5 The works are provisionally proposed for commencement of construction in September/October 2021, with work expected to be completed by March 2023.

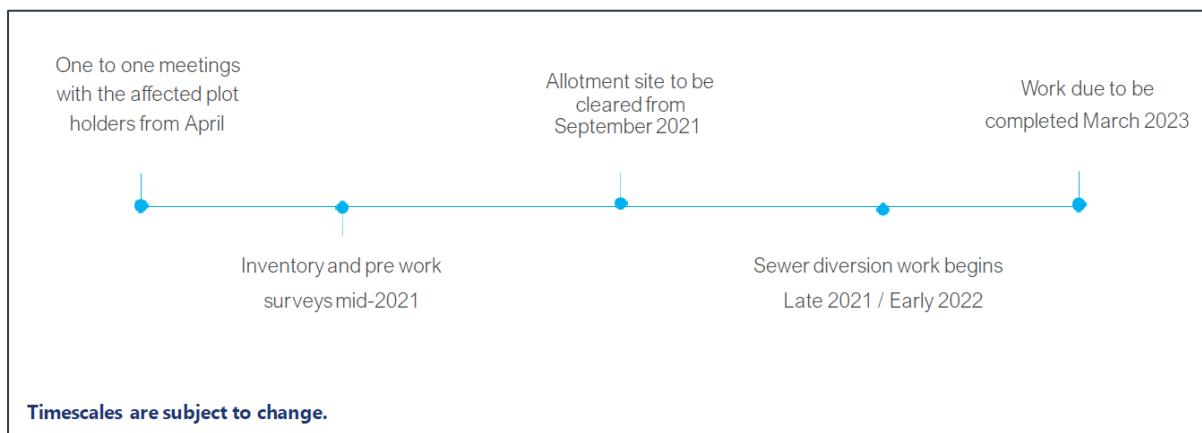


Figure 1: Indicative timeline of works

4.6 The Design and Optioneering Report (Appendix J) outlines the planned underground sewer diversion works and the optioneering process that took place to determine the most appropriate solution.

5 Planning Policy

5.1 It is considered that the following policies are relevant to the application, and the alignment of the proposals with these policies is discussed later in this document.

National Planning Policy

5.2 The revised National Planning Policy Framework (NPPF) was published in February 2019. The policy guidance it contains which is relevant to the determination of this application includes provision for:

- A presumption in favour of sustainable development.
- Approving development proposals that accord with the development plan without delay.
- Proactive drive and support for sustainable economic development to deliver infrastructure that the country needs.

Local and Regional Planning Policy

5.3 The development plan for the proposed development comprises the London Borough of Hillingdon Local Plan Part 1: Strategic Policies (adopted November 2012), Local Plan Part 2: Development Management Policies, Site Allocations and Designations (adopted January 2020) and the London Plan (March 2021). The development plan policies that are considered relevant to the assessment of the proposals are listed below.

- **Hillingdon Local Plan Part 1:**
 - Core Policy HE1: Heritage
 - Core Policy BE1: Built Environment
 - Core Policy CI2: Leisure and Recreation
 - Core Policy EM2: Green Belt, Metropolitan Open Land and Green Chains
 - Core Policy EM4: Open Space and Informal Recreation
 - Core Policy EM6: Flood Risk Management
 - Core Policy EM7: Biodiversity and Geological Conservation
 - Core Policy EM8: Land, Water, Air and Noise
- **Hillingdon Local Plan Part 2:**
 - Policy DMHB 1: Heritage Assets
 - Policy DMHB 3: Locally Listed Buildings
 - Policy DMHB 14: Trees and Landscaping
 - Policy DMEI 4: Development on the Green Belt or Metropolitan Open Land
 - Policy DMEI 6: Development in Green Edge Locations
 - Policy DMEI 7: Biodiversity Protection and Enhancements
 - Policy DMEI 9: Management of Flood Risk
 - Policy DMEI 10: Water Management, Efficiency and Quality
 - Policy DMEI 12: Development of Land Affected by Contamination
 - Policy DMT 2: Highways Impacts
- **The London Plan 2021:**
 - Policy SI5 Water Infrastructure
 - Policy HC1 Heritage Assets and Archaeology
 - Policy G6 Biodiversity and Access to Nature
 - Policy G7 Trees and Woodlands
 - Policy D14 Noise
 - Policy G2 London's Green Belt
 - Policy G4 Open Space
 - Policy G9 Geodiversity

6 Assessment of Proposed Development

Pre-Application Advice

6.1 Pre-application advice was received from Hillingdon London Borough Council on 5th May 2021, as a report which provided a preliminary assessment of the proposals, including an indication of the main issues raised by the relevant council officers. This included issues of potential ground contamination; maintenance access; impacts on heritage assets; and reinstatement of the site. The following sections of this chapter outline the consideration that has been given to these issues, amongst others, and mitigation measures that are proposed. References are provided for relevant appendices which provide further details.

Wastewater Infrastructure

6.2 Policies within both the Hillingdon Local Plan (DMEI 10) and the London Plan (SI5) are supportive of the provision of necessary wastewater infrastructure. Policy DMEI 10 is aimed at ensuring

adequate provision of water and wastewater infrastructure to serve existing and new development. Policy SI5 aims to ensure that London has adequate and appropriate wastewater infrastructure.

6.3 The proposed temporary works are necessary for the diversion of an existing below ground sewer that is a key part of the wastewater network serving the surrounding area. This work is essential to ensure that Thames Water continues to provide wastewater services to residents in the surrounding area in its capacity as a statutory undertaker. The principle of the proposed development is therefore in accordance with the above-mentioned policies.

Impact on Green Belt

6.4 In relation to impacts on the Green Belt, the proposal does not constitute the construction of new buildings as set out in paragraph 145 of the NPPF. Paragraph 146 of the NPPF states that certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes engineering operations.

6.5 The Government's Planning Practice Guidance (PPG) on Green Belt development provides guidance on assessing the impact of a proposal on the openness of the Green Belt. This lists matters that the courts have identified may need to be taken into account when making this assessment, including:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.*

6.6 Any such impact upon openness will be for a short period of time with the temporary, minimal impacts on openness being entirely reversible. It is therefore considered that given the temporary nature of the works and the reinstatement of the site, the proposals would not have a long or medium term negative impact on the openness of the Green Belt, and that any short term impacts are clearly outweighed by the statutory requirements of Thames Water.

6.7 In light of the above, given the classification of the proposals as an engineering operation, the temporary nature of the work, and the proposed reinstatement of the site, the development is not considered to be inappropriate development in the Green Belt and therefore does not conflict with paragraph 133 of the NPPF, policy DMEI 4 and DMEI 6 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020), Policy EM2 of the Local Plan Part 1 (2012) and Policy G2 of the London Plan (2021). This was confirmed in pre-application advice received from Hillingdon London Borough Council.

Highway and Access Impacts

6.8 Hillingdon Local Plan Policy DMHB 12 requires development to be well integrated with the surrounding area, providing safe and direct pedestrian and cycle movement through the space and using good quality materials undertaken to a high standard. Policy DMT 2 states that development proposals must ensure that safe and efficient vehicular access to the highway network is provided to the Council's standards.

6.9 The proposed development includes temporary alterations to the existing access from Ickenham High Road. The Vehicle Tracking Plans within the appended Construction Logistics Plan (CLP) for Temporary Site Access (Appendix B) show that the largest type of construction vehicles

(16.5m articulated) can safely enter and exit the modified access. The Visibility Splay Plans within the same document shows that the necessary visibility splays will be provided at this junction. It should be noted that the appended CLP is included as provisional information only, subject to update by the appointed contractor once the detailed construction requirements have been finalised. It is suggested that a planning condition is used to secure the relevant details in an updated Construction Method Statement and/or Construction Logistics Plan.

- 6.10 The average anticipated daily number of construction vehicles (7.5t or above) expected on site over the project duration is 2 vehicles. An increase in vehicles will be required during the shaft construction phases between months 3 and 7, with an expected peak of 16 vehicles required on a single day in the programme. This will not be for a prolonged period and from month 9 onwards a reduced level of vehicles will be required. It is not considered that this level of additional traffic will have an adverse impact on the highway network or on the amenity of the surrounding area. It is not anticipated that any road closures will be necessary as part of the works.
- 6.11 Pre-application advice has highlighted that the site access will occupy land that is used by Hillingdon Council's Green Spaces team to access the surrounding land for maintenance, and that the proposals may block this access. The maintenance requirements for the relevant land will be established through discussions with the Green Spaces team, and the contractor will either arrange access or undertake the required maintenance themselves.
- 6.12 The proposed modifications to the access incorporate a widened vehicle crossover. In order to ensure that construction vehicles can safely access works areas and the works site compound, traffic management measures / safety mitigation will be implemented on site by the appointed contractor. The Visibility Splay Plans show there is adequate visibility for construction vehicles entering or exiting the haul road access.
- 6.13 Traffic management measures will mitigate risks to highway users and pedestrians for the duration of construction and the site will be reinstated to its original condition on completion of the sewer diversion works. The appended Construction Logistics Plan contains further provisional details, subject to update by the construction contractor.
- 6.14 The proposed development is therefore in accordance with Policies DMHB 12 and DMT 2.
- 6.15 Pre-application advice from Hillingdon Council in relation to the site access suggested the longer-term retention of the access improvements for the benefit of residents and the council, with appropriate drainage. It is recognised that this needs to be balanced with the requirement to reinstate the green space and maintain or enhance the setting of the nearby heritage assets, as stated in the heritage section of the pre-application advice. As such, collaboration with the relevant Hillingdon Council officers will take place in due course, to establish an appropriate solution which can be secured via a planning condition. The proposals for reinstatement are shown in the Landscape Plan.

Residential and Leisure Amenity Impacts

- 6.16 Hillingdon's Core Policy BE1 requires all new development to be designed appropriately to protect the amenity of surrounding buildings. Hillingdon's Core Policy EM8 and London Plan Policy D14 also seeks to ensure that noise generating development is adequately controlled and mitigated. Hillingdon Core Policies EM4 and CI2 look to protect and improve leisure and recreational facilities within the borough, including green infrastructure. Similarly, London Plan Policy G4 aims to protect green space and ensure it remains publicly accessible.
- 6.17 The new sewer and manholes will be installed entirely below ground and will not generate any significant noise or vibration. There will be no additional odour emissions. Dust mitigation and best practice measures will be implemented via a Construction Method Statement (CMS), to be supplied once a contractor has been appointed.

6.18 The appended HS2 London-West Midlands Code of Construction Practice (CoCP) (Appendix I) outlines noise and vibration mitigation measures applied on the HS2 project. Noise mitigations appropriate to the works and in line with HS2 standards will be implemented, including noise and vibration monitoring to ensure and demonstrate compliance with all noise and vibration commitments and the requirements of the HS2 CoCP.

6.19 Policy EM8 also aims to ensure that development does not cause deterioration in the local air quality levels. Appropriate air quality management measures will be implemented, in line with the HS2 CoCP standards. In dry weather dust suppression equipment will be used and monitors may be put in place. Machinery and dust-causing activities are to be located away from sensitive receptors, where reasonably practicable. The erection of hoardings along the site boundary will also help to mitigate the spread of dust, along with other measures such as covering materials, deliveries or loads entering and leaving the construction site for the purposes of preventing materials and dust spillage.

6.20 The HS2 CoCP also requires all construction vehicles used during construction to be powered by set minimum vehicle emission standard engines in order to mitigate impacts on local air quality. Euro class standards have been set for heavy goods vehicles and light duty vehicles.

6.21 Onsite working hours will initially be Monday to Friday 8am-6pm and Saturday 8am-1pm, however once the tunnel construction starts, there will be periods in which the tunnel boring machine will be running for 24 hours a day. These specific periods will be confirmed once a more detailed programme is established by the contractor. The amenity of surrounding properties will be protected, including through appropriate noise limits and mitigations during construction. Once complete, the new sewer will be entirely below ground, and any noise or vibration would be negligible.

6.22 The reinstatement of the site following completion of the works means the leisure amenity of the open green areas, the allotment gardens, and the public footpath will be fully restored, in alignment with Hillingdon's Core Policies EM4 and CI2, and London Plan Policy G4.

Water and Flood Risk

6.23 The Ickenham Stream (main river) runs south of the railway and joins the Yeading Brook (main river) before flowing to the River Crane and finally the River Thames. It runs adjacent to the allotments, and under The Greenway. Some of the works will be directly adjacent to the Ickenham Stream. The Environment Agency (EA) Flood Risk Officer has confirmed that he has witnessed the Ickenham Stream flowing in both directions as a result of rainfall from different areas draining to the stream. None of the works fall within Flood Zone 2 or 3, with the exception of a portion of the temporary bridge which crosses the Ickenham Stream, so the risk of flooding is considered to be very low. A flood model was completed to determine the temporary bridge requirements and will be submitted to the EA as part of the permit application. The proposals therefore align with Hillingdon's Policy DMEI 9 and Core Policy EM6.

6.24 Thames Water's GIS shows that there are surface water sewers in proximity to the works (within roads) and that a number of these drain to the Ickenham Stream and to the River Pinn. Hillingdon's Policy EM8 seeks to safeguard and improve all water quality. Mitigation measures will be implemented to prevent pollution of controlled waters via direct runoff or via highway gullies, including the protection of the gullies leading to surface water sewers. Such mitigation measures will be in line with the requirements of the HS2 CoCP.

6.25 Environmental Permits and Consents will be obtained from the Environment Agency and Hillingdon Council Drainage Officers where required for all dewatering, discharges, abstractions, and other works (such as the temporary bridge) affecting the Ickenham Stream.

Heritage

6.26 Core Policy HE1 Heritage aims to conserve and enhance Hillingdon's distinct and varied environment, its setting and the wider historic landscape. Policy DMHB1 states that the Council will expect development proposals to avoid harm to the historic environment. Similarly, Policy DMHB3 requires proposals to retain the setting of locally listed buildings. London Plan Policy HC1 sets out that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

6.27 There are locally listed buildings near the proposed access to the southern working area (1-2 The Green, 61 High Road, 65 High Road [The Soldier's Return public house] and 67-69 High Road). These buildings and their settings will not be affected in the longer-term, and the site will be reinstated to its original condition. It is recognised that there will be some temporary effects on the setting of these buildings. The access route will be partly situated within the wooded area and therefore ensures some existing screening of this route as well as of the site compound in the allotment area. The reinstatement of the site will aim to enhance the verdant quality of the site as far as possible. The pre-application report raised specific concerns regarding the loss of the existing flower bed along Ickenham High Road. It is intended that this will be replaced, however, as stated in the Highways and Access section, it is recognised that Hillingdon's desire for longer-term betterment of the access needs to be balanced with the requirement to reinstate the green space and maintain or enhance the setting of the nearby heritage assets, and this will be subject to further discussions with Hillingdon. Reinstatement proposals are shown in the Landscape Plan.

6.28 As suggested in pre-application advice, it is proposed that the Soldiers Return Public House will be surveyed and monitored, and any mitigations implemented as required, to ensure the building is safeguarded. This could be secured via planning condition.

6.29 The heritage impacts are discussed further in the appended Heritage Statement (Appendix A).

6.30 There are no other archaeological designations within 500 metres of the site, however the appended Heritage Statement (Appendix A) discusses any proposed mitigations in relation to unrecorded archaeological remains. The proposed development is temporary in nature, and the site will be reinstated to its original condition on completion of construction.

6.31 The application site is not subject to any statutory and non-statutory archaeological designations. There are a number of Prehistoric finds and Mediaeval monuments within the area immediately surrounding the works location and as such there is potential for previously unrecorded archaeological remains to be present within the working area. Greater London Archaeology Advisory Service (GLAAS) has confirmed to HS2 (DRN 26/05/20) that the prospect of significant archaeological discoveries south of the Chiltern Mainline is considered to be very low. This is due both to the results of archaeological evaluation within Ruislip Golf Course, and the largely suburban built-up character of the area south of the Chiltern Mainline.

6.32 It is therefore expected that there will be no, or very limited, impacts to heritage assets as a result of the proposed development and the proposals are therefore in accordance with Hillingdon's Policies HE1 and DMBH 1, and London Plan Policy HC1.

Biodiversity and Trees

6.33 Hillingdon Local Plan Policy DMHB 14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit, and Policy DMEI 7 requires loss of biodiversity to be replaced with features of equivalent value on-site. Core Policy BE1 requires all new development to be designed appropriately to the context of Hillingdon's landscape. London Plan Policy G6 states that development proposals should

manage impacts on biodiversity and aim to secure net biodiversity gain. London Plan Policy G7 requires trees and woodlands to be protected and maintained.

- 6.34 The proposed location for the southern working area, site compound and access road have been selected to minimise the need for tree removal, as far as possible. However, in order to enable the construction works some removal of trees and canopy pruning will be required along the route of the southern access road. None of the trees to be removed are subject to Tree Preservation Orders.
- 6.35 A Tree Survey (Stage 2 Tree Survey Report: Mains Work (Ruislip Golf Club & The Greenway)) has been prepared and is appended to this document (Appendix D). The Tree Survey identifies the individual trees and tree groups that are proposed for removal/canopy-pruning and sets out the measures proposed to protect retained trees during construction. As the contractor finalises the designs, efforts will be made to minimise the number of trees and areas of vegetation removed, and therefore amendments to the details in the Tree Survey may be required as construction requirements are confirmed.
- 6.36 The mitigation and management measures as set out in Section 5.2.3 of the Stage 2 Tree Report: Main Works (Appendix D), for proposed works adjacent to/within the RPA's of the retained trees shall be adopted for those trees along the south western boundary, where originally it states that they will be a protected with barriers. The trees in the associated area are TG10, TG11, T54, TG14, T8, TG15, T63, T64, T65 and T66.
- 6.37 Any pruning required to limit the damage to branches and limbs will be subject to the necessary ecological surveys and supervision as stated.
- 6.38 An arboriculturist will be on site to oversee site set up, removal of trees and canopy-pruning, and ensure that suitable tree and root ground protection measures are in place prior to the commencement of construction. An ecological watching brief will also take place in the event that any removal of trees/vegetation would take place within the bird nesting season (March to August), although it is currently anticipated that the works would commence in October/November 2021, outside the bird nesting season.
- 6.39 Reinstatement of the land, including the provision of replacement trees will be undertaken as shown on the Landscape Plan (Drawing 17). The proposed replanting of trees will provide a biodiversity benefit in the longer term and will ensure that there will be no significant adverse impact on nature conservation, habitats or species, including trees and woodlands. This will be in keeping with Thames Water's Asset Standards to replace trees on at least a like-for-like basis and where possible to provide biodiversity enhancements.

6.40 The Tree Survey Report identifies the trees that will require removal as part of this application, as follows:

Location	Trees / Tree Groups to be removed	Category	Height (m)	Trunk / Stem Diameter (mm)	Tree Group Approx Area (m ²)
Allotments	T38	B	18	1200	
	T39	B	10	610	
	T77	B	24	630	
	TG8 (all)	C	6	120	291
	TG17 (all)	C	7	300	131
Woodland	T14	C	8	460	
	T16	C	16	700	
	T28	C	19	420	
	T189	C	18	380	
	T193	C	16	360	
	TG5 (part of)	C	10	450	210
	TG9 (part of)	C	12	500	1019
	TG16 (part of)	C	15	400	109
Open Space off The Green	TG3 (part of)	C	6	240	11
	TG79 (part of)	C	5	150	168
Access road off High Road, Ickenham	T1	C	11	345	
	T2	C	5	60	
	T4	C	6	140	
	T5	C	13	250	
	T6	C	13	395	
	T7	C	16	580	
	TG1	C	12	140	76
Totals	Trees	14			
	Tree Groups (No)	8		Tree Group Area	2015m ²

Table 1: Trees to be removed

6.41 Use of temporary ground protection and erection of Heras tree protection fencing in accordance with BS5837:2015 around certain trees will be implemented, as detailed in the Tree Constraints and Protection Plan (Appendix C to the Stage 2 Tree Survey Report [Appendix D]). Any pruning required will be undertaken by a competent arboriculturist and kept to a minimum.

6.42 Whilst several trees will require removal, proposals for the replanting of the trees are shown within the Landscape Plans (Drawing 17), supporting the longer-term biodiversity of the site, with an aim to provide a biodiversity benefit. The appended Ecology Report (Appendix C) discusses other relevant biodiversity issues.

6.43 The landscape will be returned to its original condition, and the proposed development is therefore considered to be in accordance with Hillingdon's Local Plan Policy DMHB 14, DMEI 7, Core Policy BE1, and London Plan Policies G6 and G7.

Ecology

6.44 Hillingdon's Core Policy EM7 requires protection and enhancement of protected and priority species and habitats, as well as improvements to biodiversity.

6.45 A bat roost potential survey was completed in Spring 2019 for trees which could be impacted south of The Greenway. Trees of moderate/high potential which were required to be removed or pruned were then assessed by a tree climbing survey and emergence surveys in September 2020. Detailed climbing and dusk emergence surveys of trees inspected showed low or negligible suitability. A further bat roost potential survey of all trees to be removed will be completed during summer 2021.

6.46 A preliminary bat roost assessment (PRA) was undertaken on the 26th of February 2021 by two ecologists. A total of seventeen outbuildings located at Ickenham Green Allotments were assessed. This survey was not a follow up to any previous ecological surveys conducted in the area by Jacobs UK Ltd. A systematic search of the interior and exterior of outbuilding 1 and the exterior of outbuilding 2-17 was made from the ground with the aid of binoculars and a high-powered torch.

6.47 Four outbuildings are considered to have low suitability for roosting bats. A limited number of small gaps were found on the exterior of these outbuildings, which have the potential to support small numbers of crevice-dwelling bats. The other thirteen outbuildings are considered as having negligible suitability for roosting bats.

6.48 No evidence of roosting bats was recorded during the PRA and no outbuildings were considered to provide habitat suitable for hibernating bats. For the four outbuildings in the allotments identified as having low potential to support roosting bats, further surveys will be undertaken to determine the use of these structures by bats if present. This will consist of either a single external and internal endoscope inspection of all potential roost features on these outbuildings, or a single emergence/re-entry survey for each outbuilding, carried out by a suitably qualified ecologist between May and September 2021. If no bats or bat roosts are identified during the surveys then no further surveys are required, and the structures will be removed.

6.49 eDNA surveys for great crested newts were undertaken on two small ponds located within the allotments to the south of The Greenway in April 2019. One pond obtained a negative result and the second pond an indeterminate result. Based on the proximity of the ponds to each other it was deemed that great crested newts are absent from both ponds within the allotments.

6.50 The areas of scrub and trees within and adjacent to the proposed development are considered suitable to support breeding birds, with the wider habitats providing suitable nesting, commuting and foraging habitat for a variety of bird species. Pre-construction checks for nesting birds will be undertaken by a qualified ecologist should works commence within the nesting season, although works are provisionally scheduled for construction in October/November 2021, outside of the nesting season.

6.51 A small population of slow worm is resident within the allotments, and small populations of common lizard, slow worm and grass snake are resident along the adjacent railway habitat. Wherever possible, the temporary access tracks and working areas have avoided stands of tall vegetation to ensure that reptiles are not harmed during the works, and vegetation clearance within areas of the site considered suitable to support reptiles will be cleared in a sensitive manner under the guidance contained within a Precautionary Method of Works (PMW) and the presence of a qualified ecologist.

6.52 Surveys conducted in connection with HS2 have confirmed badger activity in the wider area although no signs of badgers were observed within the woodland to the east of the allotments or within the overall footprint of the proposed development. However, as badgers are a highly mobile

species pre-construction checks for badgers will be undertaken by a qualified ecologist prior to the works commencing. Surveys have concluded that the Ickenham Stream has no potential to support water vole or other riparian species. Ecological toolbox talks will also be given to site personnel by the site ecologist.

6.53 The Ecology Report appended to this document (Appendix C) provides further details on relevant ecological issues and the appropriate mitigations to ensure that species and habitats are protected and enhanced, including sensitive methods and timing for vegetation clearance. The proposals therefore accord with Hillingdon's Core Policy EM7.

Community Engagement

6.54 Community engagement has taken place with residents along The Greenway, The Green, and Oak Avenue; users of the footpath and allotments; Ickenham Cricket Club; and residents in the wider area and local businesses. A record of this engagement is provided in the appended Statement of Community Involvement (Appendix E).

6.55 This explains that appropriate engagement and consultation has taken place, including public drop-in sessions and letter drops in advance of the works. Discussions with some residents of The Green took place in December 2020 and a community update briefing took place on 4th March 2021, which took place online due to the implications of Covid-19.

6.56 Community engagement has also involved liaising with the individual allotment plot holders. This includes understanding and mitigating their concerns, as well as establishing their requirements in terms of reinstating the allotment plots. A full inventory and precondition survey will be carried out within the working area. Following completion of the sewer diversion works the ground in the allotments will be rotovated to a standard agreed with the allotment secretary/society, and Thames Water will work with the allotment secretary/society to identify and offer assurances on areas that can be improved. This could include: improvements to the footpaths and local roads in the area, which are affected by the works; increasing the current water supply; replacement of the communal shed; installation of new sheds and fences; and replacement of items such as topsoil, boarded planting beds and consumables (manure/sand/compost).

6.57 Engagement with the local community will continue ahead of construction and throughout the construction period including notifications of the planning application and how to view / comment on the plans; one to one meeting with residents of The Green; and engagement events with the local community and allotment holders.

Ground Investigations and Contamination

6.58 A site-specific ground investigation (GI) was undertaken (May/June 2020) to confirm the stratigraphy, geotechnical parameters, any structural geological features, groundwater conditions, the thickness and composition of Made Ground, construction materials specification, excavated materials management and health and safety of the construction crew. The GI include soil and groundwater sampling for chemical testing to assess the nature and extent of potential contaminants. Standpipes were to be installed for groundwater and ground gas monitoring.

6.59 A Geo-Environmental Interpretative Report (GIR) was completed by Stantec in September 2020, and is appended to this document, along with a Factual Report on Ground Investigations which summarises the investigative work and findings (Appendices F and G respectively). This ground investigation included four boreholes completed south of the railway line (allotments) in May and June 2020. Groundwater and ground gas monitoring was completed on four separate occasions between 15-16th June 2020 and 4th August 2020. The GIR shows no asbestos was detected, no exceedances of Generic Assessment Criteria (GAC) were recorded in soil leachate tests and

hazardous properties were not detected in the soil samples. There were no obvious signs of visual or olfactory contamination noted on the borehole logs.

- 6.60 Soil samples from the Stantec boreholes (2020) showed no exceedances of commercial or public open space GACs (S4UL, C4SL- Lead only, Stantec GAC-cyanide only). No asbestos was detected in the two topsoil samples and four made ground samples. No hazardous properties were detected in the samples. One groundwater sample was collected for each of the boreholes. One exceedance the Environmental Quality Standards (EQS) of nickel was found at Borehole 8 and one of sulphate was found at Borehole 7.
- 6.61 This assessment shows there is very little evidence of contamination at the site. Appropriate toolbox talks and safe working practices will be adopted, and a watching brief maintained throughout construction. Should visual and/or olfactory indicators of contamination be encountered (including potential asbestos containing materials (ACMs)) works will cease in that area and advice will be sought from a suitably qualified Geo-Environmental Engineer.
- 6.62 A soils management plan (SMP) and construction environmental management plan (CEMP) will be developed once the contractor has been appointed and established further construction details, which will follow current guidance and waste management requirements. This will look to retain and reuse materials in-situ where possible in the first instance. It is expected that approximately 50% of excavated material will be reused or recycled. This figure will be confirmed in the SMP/CEMP.
- 6.63 During construction, mitigation measures recommended within the above-mentioned ground investigation reports relating to contaminated land will be implemented and adhered to on site. Safe working practices will be in place during construction, along with appropriate pollution prevention measures to avoid contamination of the ground, water and air during construction. The proposals are therefore in compliance with Hillingdon's Policy DMEI 12.

Utilities

- 6.64 There are several utilities within the vicinity of the proposed works. A utilities survey has been carried out and records have been requested from the relevant utility companies. This information is shown in the Utilities Plan (J923_01-AJ-TS001304-101-DR-C-0002). The scheme has been designed to avoid impacts on these utilities.
- 6.65 Prior to the commencement of any exploratory hole all positions were checked for buried services by a specialist utility surveyor using a cable avoidance tool (CAT), signal generator, and ground penetrating radar (GPR). The survey was carried out by RSK SafeGround.

Public Rights of Way (PRoW)

- 6.66 The majority of the works including the temporary compounds and access road are Registered Common Land, and designated Green Belt land. Any permanent works in this area will be entirely below ground and the associated working areas, site compounds and access roads will all be temporary in nature. Access to the common will not be impeded in the longer term once construction is completed and the land is reinstated. Discussions with Hillingdon Council as the controller of the common are ongoing.
- 6.67 A Public Footway is located adjacent to the proposed works. Known as the Hillingdon Trail and Willow Tree Wanderer Footway (Footpath R146 and U81), it crosses the golf course north-south and follows a tunnel under the railway into The Greenway. It then runs west along The Greenway, turns south-west and then south-east along the boundary of the allotments and woodland before re-joining the High Road at Ickenham. The Hillingdon Trail also follows the existing access to the south of The Soldiers Return public house, which is to be widened to facilitate access for construction vehicles to the welfare and working compounds. A small section of the footpath to

the west of the allotment area may require a temporary re-alignment during the works, keeping the footpath open but segregated from construction traffic access. This is shown in the Site Plan (J923_01-AJ-TS001304-101-DR-C-0030). The final approach will be agreed with Hillingdon Council's PRoW Officer, with the necessary consultation and notices concluded prior to the start of works.

6.68 Associated dewatering works may require a discharge pipe to be laid along the footpaths (Footpath R145 and Hillingdon Trail U81) to discharge to the River Pinn (main river). Safe public access along these footpaths will be maintained.

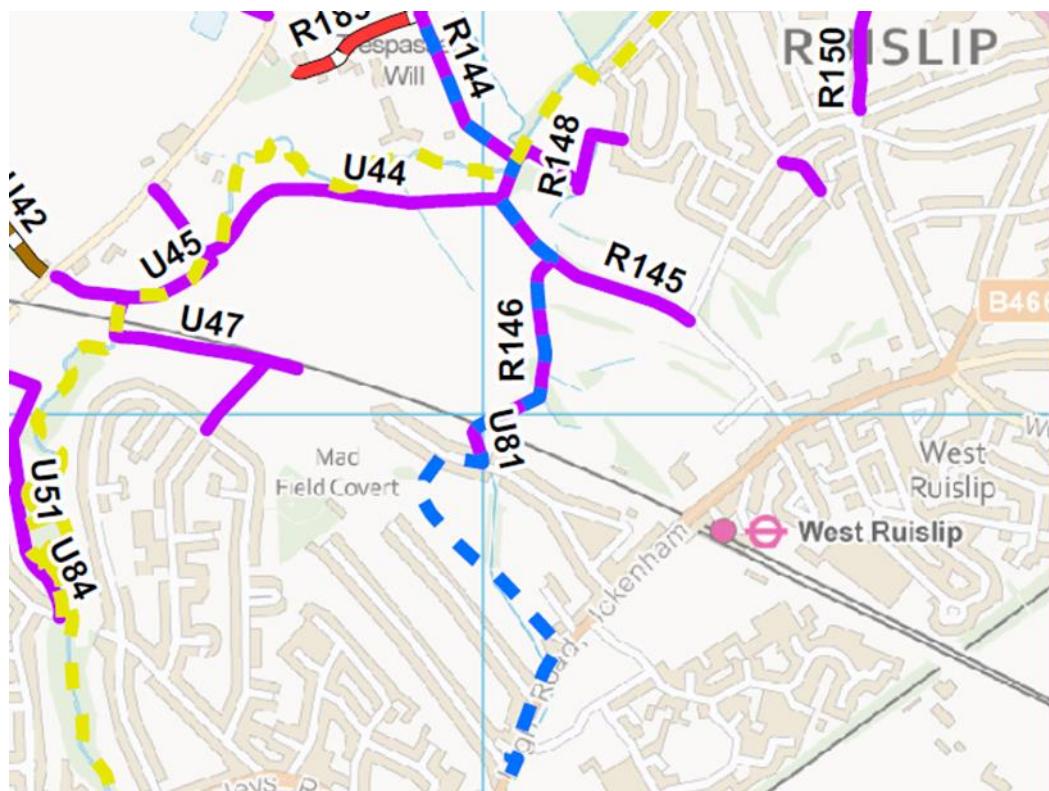


Figure 2: Public Rights of Way, Hillingdon Borough Council

7 Conclusion

7.1 The proposed temporary development is necessary to enable essential works to divert an existing below ground sewer, which is a key part of the wastewater network serving the surrounding area. This is required to avoid the sewer being impacted by the HS2 works, which include a portal required to bring the HS2 rail line from underground to above ground at this location. The sewer re-alignment work is necessary to ensure that Thames Water continues to provide wastewater services to residents in the surrounding area in its capacity as a statutory undertaker. Both the London Plan and the Hillingdon Local Plan recognise the need for adequate wastewater infrastructure and the pressure on the capacity of the existing network. Wastewater infrastructure is a fundamental aspect of the built environment, and therefore an important aspect of a planning authority's role in ensuring the development of the necessary infrastructure required to serve the area's population. Both the London Borough of Hillingdon and the Greater London Authority are supportive of the principle of necessary such development.

- 7.2 The proposed development is temporary in nature and will not result in any significant adverse impacts on heritage assets, biodiversity, or the wider environment in the long term. Any impacts associated with an increase in construction traffic will be temporary and will not have an unacceptable adverse impact on the highway. The proposed design and traffic management measures will ensure the safety of highway users and pedestrians. The site will be reinstated to its original condition on completion of construction.
- 7.3 The proposed development is in accordance with the policies of the development plan and it is considered that planning permission should be granted.
- 7.4 Additionally, it is proposed that a Construction Method Statement / Construction Environment Management Plan would be provided once a sufficient level of detail is known, subsequent to the appointment of a contractor. This could therefore be secured via planning condition.