

Planning Statement

Land At Moorcroft Lane, Pield Heath Road, Hillingdon

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1. Introduction

- 1.1 Savills UK Ltd have been instructed by The Hillingdon Hospitals NHS Foundation Trust (subsequently referred to as 'the Trust') to submit a planning application for the following development at the Land at Moorcroft Lane, Pield Health Road, Hillingdon, UB8 3HD.

Description of Development

"Provision of a temporary car park."

Background

- 1.2 On 18th January 2023, a Hybrid planning permission was approved for the redevelopment of Hillingdon Hospital (ref. 4058/APP/2022/1788) for the following development:

"Full Planning Permission for the demolition of the existing Hillingdon hospital and associated buildings, and the erection of a new, replacement hospital, multi storey car park, mobility hub alongside highway works and opens space incidental to the proposed development; and for outline planning permission, with all matters reserved except for access, for a mixed use development comprising up to 327 residential units and 800 sqm of supporting commercial, business and service use."

- 1.3 Due to the application being of a potential strategic importance, it was referred to the Mayor under category 1A, 1B, 1C and 3F of the Schedule to the Order 2008 and therefore was subject to a GLA Stage 2 referral. This was completed on 14th September 2023 and it concluded that the Mayor was content for the Council to determine the case itself as the strategic issues raised at consultation stage were successfully resolved.
- 1.4 In the S106 agreement for the above planning permission, there is an obligation for confirmation of a Temporary Visitor and Staff Parking scheme, to come forward before the commencement of Phase 1. The S106 defines the Temporary Car Park as *"means of an off-site area of land nominated by the Owner for use as a car park by Hillingdon Hospital NHS Trust staff and visitors which can accommodate approximately 450 cars and vehicles."*
- 1.5 Schedule 11 of the S106 agreement states that:

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“Temporary Hospital Parking Arrangements

The Owner hereby covenants and agrees with the Council so as to bind the Hospital Land:

1. Not to Commence Phase 1 of the Development until either:

1.1 planning permission for a Temporary Car Park has been granted; or

1.2 a licence to occupy a Temporary Car Park has been entered into between the Owner and the owner of land to be used as a Temporary Car Park or

1.3 a lease to occupy a Temporary Car Park has been entered into between the Owner and the owner of the land to be used as a Temporary Car Park.”

- 1.6 The Applicant is pursuing option 1.1 and applying for planning permission for a Temporary Car Park, which is the subject of this application. The reasons for this are set out further in this statement.
- 1.7 During the first phase of the construction period Mott MacDonald advised that 675 hospital parking spaces will be lost. To offset this loss, the Trust has developed a decant strategy which includes some services being provided offsite at Mount Vernon Hospital with associated temporary car parking provision for 127 spaces.
- 1.8 This leaves a residual number of approximately 470 to 570 car parking spaces lost during construction of Phase 1. A temporary car park is therefore required to accommodate the shortfall during construction of Phase 1. The number of spaces has been reduced further with the intention of fewer car journeys to the hospital taking place as demonstrated in the Framework Travel Plan. This temporary car park is critical to the successful implementation of the hospital redevelopment and the significant public benefits that a new hospital will create.
- 1.9 This Planning Statement has been prepared following examination of the site and surroundings, research into the relevant planning history, and an examination of the adopted and emerging policy documents. This Statement provides background information on the Site and an assessment of the proposals in relation to planning policy and other material considerations, as set out under the following sections:

- **Section 1** provides the introduction and background to the proposals;

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- **Section 2** provides a summary of the site's context and the surrounding area;
- **Section 3** provides a summary of the planning history relevant to the site and the pre-application consultation undertaken;
- **Section 4** provides a summary of the Proposed Development;
- **Section 5** sets out the relevant planning policy framework for the Site;
- **Section 6** demonstrates the conformity of the proposed development with planning policy and
- **Section 7** presents our conclusions in respect of the proposed development.

Supporting Information

1.10 The documents submitted are:

- **Air Quality Assessment**, prepared by RSK;
- **Arboricultural Planning Statement**, prepared by ADAS;
- **Agronomist Survey**, prepared by TOHA;
- **Biodiversity Net Gain**, prepared by ADAS;
- **Car Park Management Plan**, prepared by SCP Transport Planning;
- **CIL Form 1 – Additional Information**, prepared by Savills
- **Covering Letter**, prepared by Savills;
- **Construction Management Plan**, prepared by GRAHAM Construction;
- **Site Selection Report**, prepared by Savills;
- **Site Location Plan**, prepared by Ingleton Wood
- **Design and Access Statement**, prepared by Ingleton Wood;
- **Ecological Survey**, prepared by ADAS;
- **Flood Risk Assessment and SuDS**, prepared by RSK;

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- **Landscaping and Planting Strategy**, prepared by Wynne-Williams Associates;
- **Lighting Assessment and Details**, prepared by Ingleton Wood;
- **Noise Impact Assessment**, prepared by RSK Acoustics;
- **Proposed architectural drawings**, prepared by Ingleton Wood
- **Transport Statement**, prepared by SCP Transport Planning;
- **Travel Plan**, prepared by SCP Transport Planning;
- **Site Investigation**, prepared by RSK Geosciences and
- **Security Strategy**, prepared by Ingleton Wood.

1.11 In addition to the above, an **Application Form/Ownership Certificate, Community Infrastructure Levy (CIL) Additional Questions Form**, and **Covering Letter** (prepared by Savills) have also been supplied. The **Application Fee** has also been provided under separate cover.

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2. Site and Surroundings

- 2.1 As detailed in the Section 106 Agreement, the construction of a new Hillingdon Hospital cannot commence until a temporary car park is secured. This is required in order to offset the car parking spaces that will be lost as a result of building the new hospital. The temporary car park is required to serve the existing hospital to ensure it remains fully operational until the new hospital is fully constructed.

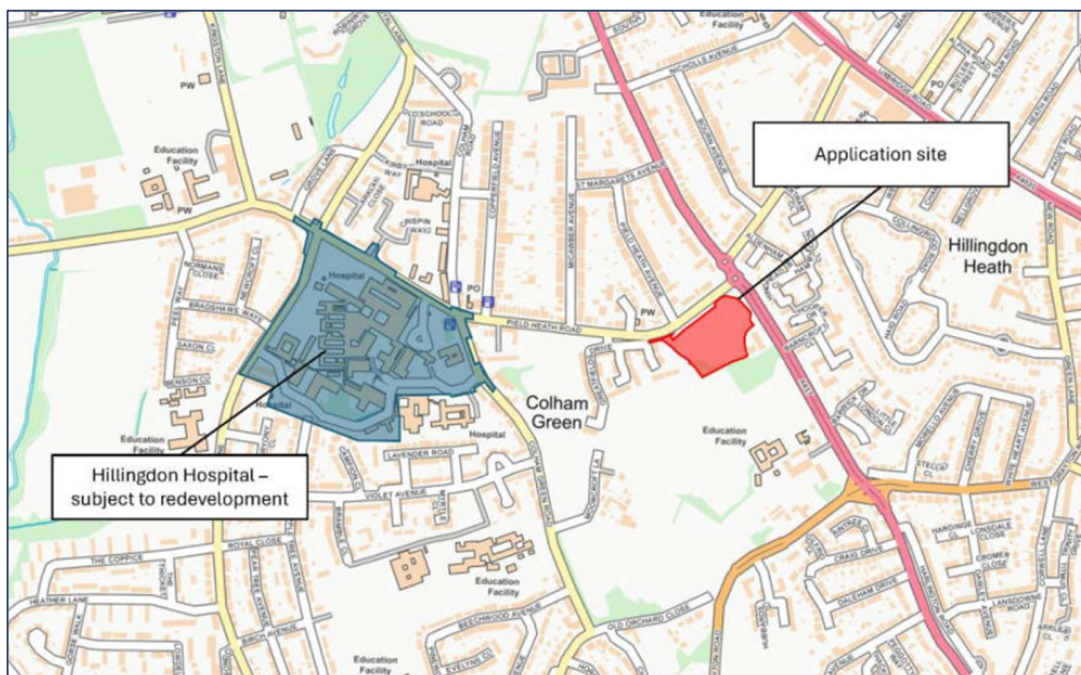


Figure 1 – Location of the Site in the context of Hillingdon Hospital which is only 600m (approx.) away

- 2.2 The Moorcroft Lane site is located approximately 600m to the east of Hillingdon Hospital's main entrance (entrance A), a 9 minute walk or a 2 minute drive from the hospital.

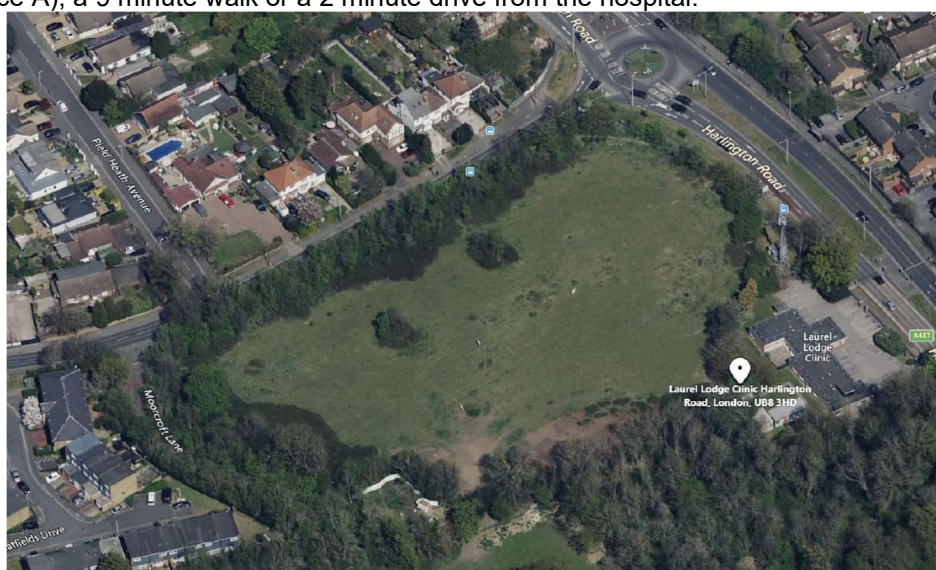


Figure 2 – Aerial view of Moorcroft Lane site

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- 2.3 The site is approximately 1.4 hectares of grassland and is currently used for grazing horses under an agricultural licence. It is generally flat with well-established tree belts around all of its borders. These screen the site from external views, which mean that the proposed car park will largely not be visible. The site is not publicly accessible and is not a public or recreational open space.
- 2.4 The Site is bounded to the north and east by the highway, and beyond this are mainly two storey residential dwellings. To the south of the site there is private woodland. Laurel Lodge healthcare facility is to the eastern corner of the site.



Figure 3 – View looking north east on Pield Heath Road shows the high level of screening from existing trees (right)

- 2.5 There is an existing entrance to the site shown in the photograph below.



Figure 4 – Existing entrance to Moorcroft Lane site as viewed from Pield Heath Road (to the left) and from above (to the right and indicated in orange)

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- 2.6 The Site is conveniently located close to the Hillingdon Hospital, with pedestrian pavements linking both Sites. This makes the Site an excellent location for a temporary car park whilst works to develop the hospital are being undertaken.
- 2.7 The site has a PTAL rating of 2-3 which is generally consistent with the surrounding area and the hospital site.

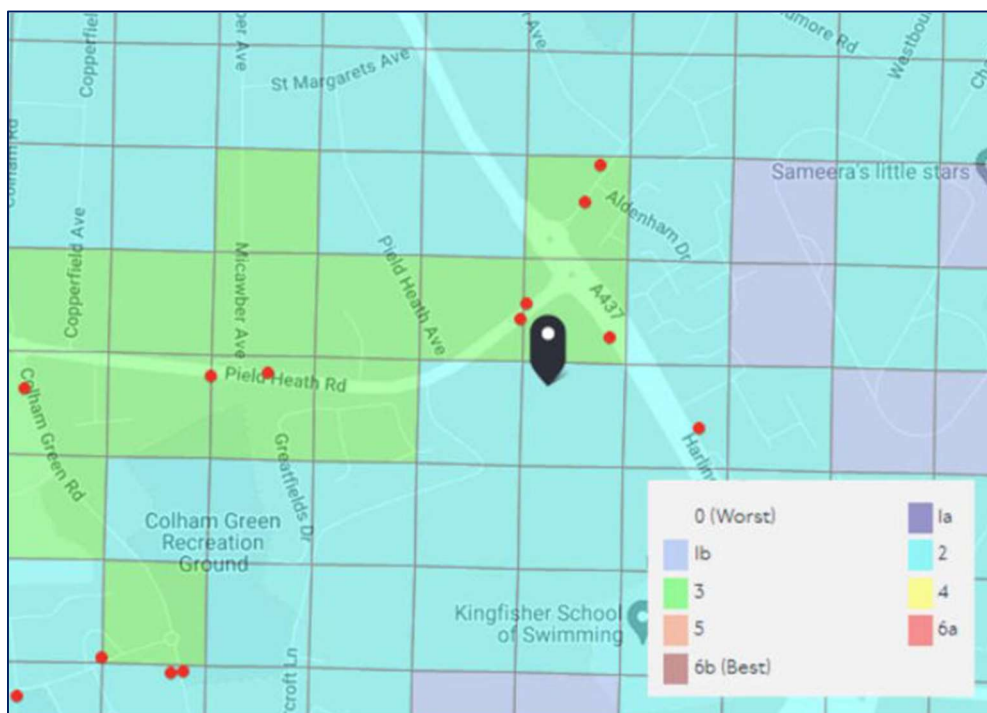


Figure 5 –PTAL rating between 2-3

Designations

- 2.8 This site is located in Flood Zone 1, meaning that flooding is unlikely to occur.
- 2.9 There are no “heritage assets” in this site or in the local vicinity. The site does not fall within a Conservation Area.
- 2.10 There are no Tree Preservation Orders on the site.
- 2.11 The site is designated as Metropolitan Green Belt.

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3. Planning History

Planning History

- 3.1 The full planning history of the site is included in **Appendix 1**. Most relevant to these proposals is the hybrid planning permission to redevelop Hillingdon Hospital (ref. 4058/APP/2022/1788). The successful implementation of this consent is reliant on a temporary car park solution being found and agreed.

Pre-application Advice

- 3.2 A Pre-Application meeting with Hillingdon Council took place on the 13th April 2022 (ref. 77070/PRC/2022/38), addressing the proposals for a temporary car park at the Land at Moorcroft Lane.
- 3.3 In their written response, dated 19th August 2022, the Council advised that a number of matters would need to be addressed.
- 3.4 Firstly, greater justification was sought around the level of car parking that needs to be provided and to examine this in the context of how much capacity within the existing hospital site could be provided. The Transport Statement submitted with this application scheme explores the existing car parking lost to the development of the hospital, what is possible to be provided on site and how parking numbers can be mitigated. However, as this is a temporary car park that seeks to simply offset existing provision that will be lost and the S106 envisages that a significant amount of parking (circa 450 spaces are to be provided), it is correct that the main method of reducing parking demand for the hospital is dealt with by the main hospital redevelopment (ref. 4058/APP/2022/1788). This has been permitted on the basis of an overall reduction in car parking provision and a series of measures to improve public transport options. This will be the long term solution for parking at the hospital.
- 3.5 Due to the proposed location of the car park on designated Green Belt the applicant's wider site selection assessment looking at potential existing car parks and brownfield sites would need to be provided to substantiate the selection of the land at Moorcroft Lane as the location for the temporary car park. A Site Selection Report is submitted with this application that examined an extensive dataset of sites, constraints, distances and opportunities and assesses these.
- 3.6 The pre-application letter (ref. 77070/PRC/2022/38) also requires a series of other matters to be addressed. These matters include Arboricultural impacts, Agronomist survey, ecology, amenity, noise, management plan, flooding, air quality and biodiversity (now a regulatory requirement). All of these matters have been fully considered and reports addressing these subjects are submitted with the planning application. The overall summary of the reports is included within this statement to address planning policy.

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- ### *Landscaping*

- [illegible]

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- 4.7 The light green areas shown in the plan above represent the soil mount areas which will be approximately 1.25m high. The darker green areas represent perennial ryegrass which will be located atop the roundabout and to the edges of the bays.

Restoration Works

- 4.8 Following an anticipated period of 7 years, the temporary car park will be removed and the land will be restored. Additional planting and landscaping will also be established to further improve the condition of the land, achieving biodiversity net gain.



Figure 8 – Proposed landscape strategy following decommissioning of temporary car park which will result in BNG

- 4.9 Following the re-instatement, it is anticipated the site will accommodate habitats of higher distinctiveness and of better condition compared to baseline. The remediation landscaping is predicted to generate an on-site increase of 1.30 units (+17.30%) and 0.09 linear units (+38.22%).

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5. Planning Policy Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act and Section 70(2) of the Town and Country Planning Act 1990 (as amended) outlines the requirement for planning applications to be determined in accordance with the development plan for an area, unless any material considerations indicate otherwise. This requirement is reiterated within the introduction to the National Planning Policy Framework (NPPF).
- 5.2 For the purposes of S.38(6) of the Planning and Compulsory Purchase Act and S.70(2) of the Town and Country Planning Act, the development plan consists of:
- Local Plan: Part 1 Strategic Policies (Adopted November 2012);
 - Local Plan: Part 2 Development Management Policies (Adopted January 2020)
 - The Local Plan Part 2: Site Allocations (January 2020)
 - The West London Waste Plan (July 2015)
 - The London Plan (March 2021)

Other Material Considerations

National Planning Policy Framework (NPPF) (2023)

- 5.3 In addition to the adopted development plan, the National Planning Policy Framework (NPPF) is an important material consideration. The NPPF sits outside of the adopted development plan, however outlines the Government's planning policies. The revised NPPF was adopted in December 2023.
- 5.4 The draft NPPF was consulted on between 30th July and 24th September 2024. The revised NPPF is anticipated to be adopted shortly.
- 5.5 Planning Practice Guidance (PPG) is also a material consideration.

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6. Planning Considerations

6.1 This section assesses the proposals against the national, regional and local planning policy framework and sets out the main planning issues. The main planning considerations for the development, and those which will be assessed in the following section are considered to be as follows:

- 1) **Principle of Development**
- 2) **Transport and Highways**
- 3) **Landscape, Ecology and Biodiversity**
- 4) **Trees**
- 5) **Residential Amenity**
- 6) **Flooding and Sustainable Drainage**
- 7) **Air Quality**
- 8) **Contamination**

1) Principle of Development

6.2 The site is located within the designated Green Belt.

6.3 The Green Belt serves five purposes which are set out in paragraph 143 of the NPPF:

- *a. to check the unrestricted sprawl of large built-up areas;*
- *b. to prevent neighbouring towns merging into one another;*
- *c. to assist in safeguarding the countryside from encroachment;*
- *d. to preserve the setting and special character of historic towns and;*
- *e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

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6.4 Paragraph 152 of the NPPF notes that development in the Green Belt is 'inappropriate' and should not be approved except in 'Very Special Circumstances'. NPPF Paragraph 154 notes exceptions as:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - – not have a greater impact on the openness of the Green Belt than the existing development; or
 - – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority

6.5 Paragraph 155 notes *"Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it"*. These are:

- a) mineral extraction;
- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.'

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- 6.6 Policy G2 of the London Plan, Policy EM2 of the Hillingdon Local Plan: Part 1 – Strategic Policies, and Policy DME1 4 of Hillingdon Local Plan part 2: Development Management policies, reflect the protection of Green Belt and exceptions as outlined in the NPPF.
- 6.7 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land **permanently** open. Indeed NPPF paragraph 142 states that the essential characteristics of Green Belts are their **openness** and the **permanence**.
- 6.8 Paragraph 154 of the NPPF states that an LPA should consider the construction of new **buildings** as inappropriate in the Green Belt.
- 6.9 It is noted that a proposal for a car park does not meet the explicit tests for exceptions as outlined in paragraphs 154 and 155 of the NPPF, and therefore development of this kind must demonstrate 'Very Special Circumstances' which outweigh any potential harm to the Green Belt caused by the development.
- 6.10 NPPF paragraph 153 states that *'Very Special Circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm resulting from the proposal, is clearly outweighed by other considerations.'*
- 6.11 The first matter to consider therefore is if constructing development within the Green Belt leads to harm, what is the degree of that harm? In order to judge that, the existing condition, designations and characteristics of the site need to be considered. For example, the harm to a Green Belt site that is largely hidden, contains some buildings and has low landscape value would be lower compared to the same development on a high landscape value, very open and visible Green Belt site for instance.
- 6.12 The selected site at Moorcroft Lane is:
- 6.13 Very hidden – being concealed on all sides by thick and tall perimeter trees and other planting that largely prevent views in to the site and therefore severely limits any appreciation of its "openness".
- 6.14 Private land – the ability to enter the site publicly and appreciate its openness from *within* the site is not possible and so the public appreciation of this is again severely limited in terms of understanding "openness". There is also no public use of the site for any recreation or open space function.
- 6.15 Ecological Value – It was found in the Preliminary Ecological Appraisal that none of the habitats on site were highly distinctive and comprised mostly common species assemblages.
- 6.16 The degree to which harm would be caused to the Green Belt is therefore heavily influenced by these site characteristics. Against these characteristics, the **VSC matters** can be assessed. These are set out below and it is considered that these significantly outweigh the harm to the Green Belt:
- 6.17 Lack of Buildings- the proposals are for a surface treatment and change of use with only one small security hut that could be considered a "building" under paragraph 153 of the NPPF. The car park, whilst development as a result of being an engineering operation, it is not a building or a structure and so the openness of the Green Belt will be largely unaffected.

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- 6.18 Permanence – The proposal is not seeking to remove or alter the current extent of the Green Belt, but it is instead seeking to lay temporary hard standing for the car park. As a central tenet of Green Belt policy, the proposals do not cause any **permanent** impacts on the Green Belt. The proposals are entirely temporary.
- 6.19 BNG – The temporary nature of the development also allows for the site to be returned to its original condition, alongside introducing important landscape improvements which will provide BNG. This will ensure that the Green Belt is maintained in the long term.
- 6.20 Delivery of a new hospital for Hillingdon – the approved Hillingdon Hospital redevelopment delivers **substantial public benefits** for the whole Borough and wider area. It can only be delivered on land currently containing surface level car parking for the existing hospital. In order to build the new Hillingdon Hospital, the existing hospital must remain operational and that includes providing appropriate levels of parking for staff and visitors. The S106 for the planning permission secures this requirement.
- 6.21 Proximity – There are significant benefits for staff welfare, convenience and staff retention and for those working shift patterns to be able to access parking facilities as close as possible to the hospital. The site provides a very convenient location for the hospital, being only a short walk away (accessible by well lit safe pavements).
- 6.22 Lack of alternative sites – Another significant consideration is that there is also a lack of other suitable sites available that will achieve the purpose required.
- 6.23 In the pre-application undertaken with Hillingdon in August 2022 (ref. 77070/PRC/2022/38), the applicant was asked to fully explore all sites with potential for temporary hospital car parking.
- 6.24 A Site Selection Report was undertaken and fully justifies why this site has been selected.
- 6.25 In discussion with the Trust, and considering realistic requirements of Hospital Staff for car parking accessible 24 hours a day, the following parameters were defined:
- *Preference is for one single site to come forward for all spaces, to maximise ease of use and management by the Trust;*
 - *Preference is for the site to be within 15 minutes walking distance of the Hospital;*
 - *Options with the potential for a “shuttle bus” to be used to sites further afield. These potential sites should be no more than a 15 minutes bus journey away. This is an undesirable option due to the operational challenges of running the shuttle bus for all users;*
 - *It will need to be accessible 24 hours a day, as staff undertake shift patterns meaning that they will need access at all times of day; and,*
 - *On site security will need to be provided, alongside suitable lighting of the car park for safety.*

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- 6.26 A Site Selection Report has been prepared in response to this advice and is submitted with this application. This analysis included the examination of an initial 170 sites which met the Trust's requirements (such that they are at least 5,000 sqm which is the measure for between 350-450 space car park), and with a filter in regards to travelling time, such that the data includes all sites that are within 15 minute walk of the hospital and those within a 15 minute shuttle bus journey, as advised by the Trust and the Council. 13 of these sites were within 15 minutes' walk of the hospital, and were therefore inherently more desirable. After filtering out sites that were not in use as a recreation ground, park or a school, 6 sites were left within a walking distance. The Site Selection Report examines these sites and concludes that the Moorcroft Lane site is the most suitable option for the temporary car park.
- 6.27 The initial 170 sites were further filtered by those which could be accessed within 15 minutes driving time during peak hour traffic, then by applying local policies and planning considerations and giving each of the remaining 10 a Red, Amber or Green rating.
- 6.28 Of these 10 sites, only one scored 'Green' for transport, but other restrictions resulted in the exclusion of this site. Given the existing access (although requiring upgrade) and proximity to the hospital site, the application site was one of three shortlisted sites which received an Amber rating, and one of two which was not excluded on other (non-transport) considerations.
- 6.29 It has therefore been demonstrated that despite the Moorcroft Lane site being located on the Green Belt, it is the only feasible option for the temporary car park location. The proposals therefore meet 'Very Special Circumstances'. It has been demonstrated that the land at Moorcroft Lane is the most suitable site available to use. Any harm generated the development will only be temporary and will be far outweighed by the significant benefits generated by enabling the delivery of the new Hillingdon hospital and the longer term BNG benefits delivered to the site at Moorcroft Lane.

2) Transport and Highways

- 6.30 Policy T1, T5 and T6 of the London Plan (2021) work together to provide a way for the strategic target of reduction in private vehicle transport, and an increase in trips within London to be made by foot, to be met by 2041.
- 6.31 Policy DMT 2: Highways impacts requires development to ensure that safe and efficiency vehicular access is provided, that proposals do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents, and that impacts on local amenity and residents are minimised through routing traffic by the most direct means to the strategic road network, avoiding local distributor and access roads.
- 6.32 Policy DMT 5 of the Hillingdon Local Plan: Part 2 Development management Policies reflects this target.
- 6.33 Policy DMT6: vehicle parking, requires that parking standards should apply to facilitate sustainable development.
- 6.34 The car park is necessary for staff and the operation of the hospital and would be available 24/7. Whilst 127 spaces have been moved through the redirection of services to Mount Vernon Hospital, the works would still leave a shortfall of spaces. The temporary car park would offset the loss of 385 car parking spaces whilst the Hillingdon Hospital development is under construction.

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- 6.35 The car park is within a short walk of the hospital. This meets the aim of the hospital in providing safe, secure and practical access to the hospital for staff and visitors.
- 6.36 The temporary car park will provide 343 standard bays for use by the hospital staff. There will also be provision for 4 electric vehicle charging bays. This is below the standard EV provision for permanent car parking, that need to be designed to accommodate the future ramping up of electric vehicle use. However, this proposal is for a temporary car park with an anticipated seven year life span. Therefore, the provision of EV charging points is considered in line current demand and also weighing up the other factor that EV charging points are expensive to install and therefore not feasible to install high numbers over a temporary duration.
- 6.37 In the pre-application advice (ref. 77070/PRC/2022/38) it was requested that *“5% of all spaces should be designated as disabled persons parking with a further 5% being enlarged bays.”* This has been accommodated in these proposals, with 38 blue badge bays being provided (11% of spaces). It is noted that although there is provision of blue badge parking at the main hospital site, this has been included in the design of the temporary car park as a precaution to align with policy requirements and the pre-application advise.
- 6.38 A Trip Generation Assessment has been prepared by SCP Transport Planning based upon the Hillingdon Hospital Redevelopment Transport Assessment, 2022 prepared by Mott MacDonald. It has been assessed in the context that the car park is temporary and is redirecting the vehicles away from the nearby existing car park to the temporary site.
- 6.39 The updated car parking survey data was used to re-estimate the traffic profile associated with the temporary car park. This resulted in a readjustment of the car parking needed to offset the loss of parking spaces on site at the hospital. As a result, the number of temporary car parking spaces needed has also been slightly reduced.
- 6.40 A PICAD assessment has been undertaken for the operation of the site access junction at weekday AM and PM peak periods. It was not considered necessary to undertake this for quieter times as the peak times would provide the *“worst case scenario”*. The results show that the junction will operate satisfactorily throughout the peak periods, with no queuing predicted on either Pield Heath Road or the access to the Site. Therefore, the effect on the junction is negligible.
- 6.41 As outlined in the accompanying Transport Statement, the impacts of the proposed car park have been assessed and the new junction will not have any discernible impact on the local highway network.
- 6.42 A Travel Plan has also been produced in support of this application. Due to the temporary nature of the use, the Travel Plan focusses on providing information to staff about alternatives to driving to the car park and instead using sustainable modes to travel directly to the hospital. This will be monitored through travel surveys annually to determine whether it is being effective in reducing personal car dependence.
- 6.43 Overall, it has been demonstrated that the proposed development will be acceptable in transport and highways terms.

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3) Landscape, Ecology and Biodiversity

- 6.44 Policy DMHB 14 of the Hillingdon Local Plan: Part 2 – Development Management Policies (2020) requires all developments to retain or enhance existing landscaping, trees and biodiversity. This requires development proposals to provide a landscape scheme.
- 6.45 As the proposals are for a temporary use, there are two key components to the landscaping proposals. The first relates to the landscaping of the temporary use which will be implemented for the purposes of the car park. The second, and arguably more significant are the landscape and biodiversity and enhancements that will be implemented following the decommissioning of the car park use. This will ensure that the land is not only restored back to its existing condition but it is improved and will ultimately provide a better offering to the green belt in the long term.
- 6.46 As highlighted in the in NPPF, paragraph 186:
- “If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.”*
- 6.47 Policy DMEI 7: Biodiversity Protection and Enhancement requires that development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss is avoidable, replacement is required on site or via offsite contributions. The policy notes that where significant harm cannot be avoided, development proposals will usually be refused.
- 6.48 It is acknowledged that in order to develop the land to be temporarily used as a car park, the majority of habitats within the development footprint will be lost, with the exception of 0.2697 ha of Other Broadleaved Woodland, which will be retained and protected. Following a period of seven years, the site will be reinstated to its former use, after which the habitat improvement will occur to enable a 10% BNG to be achieved. Following reinstatement, it is anticipated that the site will accommodate habitats of higher distinctiveness and of a better condition compared to the existing situation. The remediation landscaping will result in an on-site increase of 1.30 units (+17.30%) and 0.09 linear units (+38.22%).
- 6.49 The Biodiversity Net Gain Assessment accompanying this submission details how this will be achieved through the remediation strategy. It is also noted that subject to planning permission being granted and this approach being approved by the Council, a habitat management and monitoring plan should be prepared for the development to ensure the recommended habitat creation and enhancement measures are implemented and to detail long-term management and monitoring requirements over a minimum 30 year period or until target conditions are met.
- 6.50 It was noted in the pre-application advice (ref. 77070/PRC/2022/38) that a full Agronomist survey of the site would be required. This has been produced by Tim O'Hare Associates which included a site investigation that found that the soil is characterised by a medium soil texture and its current compacted condition means it is likely to suffer from lack of drainage and insufficient aeration. Treatment to remove large stones from the topsoil would be necessary and the potassium deficiency should be remedied. This report outlines the soil management practices throughout the sequence of proposed works.

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- 6.51 Overall, the proposals will result in a short term loss in habitats for the duration of the temporary car park. This will be mitigated by the BNG which will occur in the long term following the decanting of the car park and the implementation of the landscape remediation works. This will result in the land being in a better condition than existing and it will guarantee a long term contribution to the Green Belt and biodiversity.

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4) Trees

- 6.52 London Plan Policy G7 promotes the protection, maintenance and planting of new trees in appropriate locations in order to increase the extent of London that benefits from tree coverage. As such, development proposals are expected, wherever possible, to retain existing trees of value. Where the removal of trees is necessary, the policy is clear that there should be adequate replacement based on the existing value alongside the planting of additional new trees.
- 6.53 LPP2 Policy DMHB14 aligns with the above, and sets out how *“all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit”*. Planning applications for proposals that affect existing trees are required to provide an accurate tree survey which outlines the provision on the site and where trees are proposed for removal, proposals are expected to provide replacement provision.
- 6.54 In accordance with LPP2 Policy DMHB14, the application is supported by an Arboricultural Impact Assessment, prepared by ADAS. A survey was undertaken which identified 51 arboricultural features, comprising 32 individual trees and 19 groups of trees which have the potential to be impacted by the proposals. One of these arboricultural features was awarded a high-quality A grade, 15 were awarded a moderate-quality B grade, 29 were awarded a low-quality C grade, and six were assessed as being unsuitable for retention, and graded U due to their condition.
- 6.55 As part of these proposals, 5 of these features will be removed. The development will impact one high-quality A grade feature T23, one moderate-quality B grade feature T20 and one low-quality C grade feature T16. The impacts are caused by the development of the access and egress from Pield Heath Road and the footprint of the car park signage.
- 6.56 To mitigate this loss, it has been recommended to replant with English oak, English elm and silver lime to be situated within an area of the site which will allow for adequate growing space for the tree to reach maturity.
- 6.57 The 3 trees removed are sycamore but it has not been proposed to replace these due to their extensive presence on site.
- 6.58 It is also recommended that 6 U grade features are removed due to their poor condition, and this has been recommended irrespective of the development. No remedial planting is therefore required as a result of the removal of these poor quality features.

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- 6.59 During construction, tree protection measures will be implemented including a Construction Exclusion Zone and tree protection barriers.

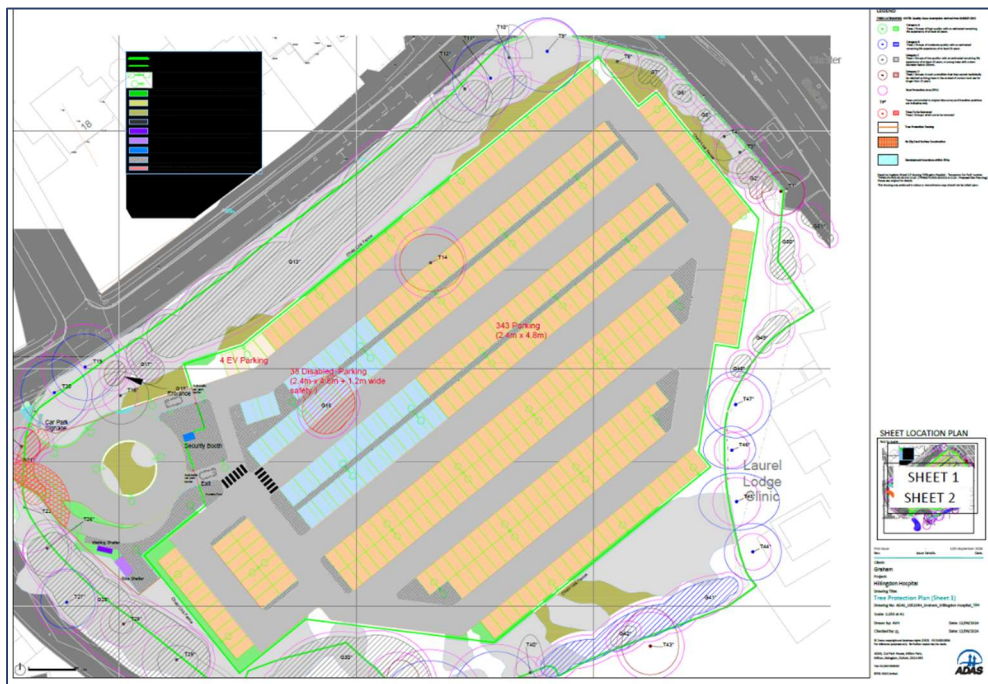


Figure 9 – Tree Protection Plan (Sheet 1) showing the location of tree protection fencing and no dig hard surface construction areas

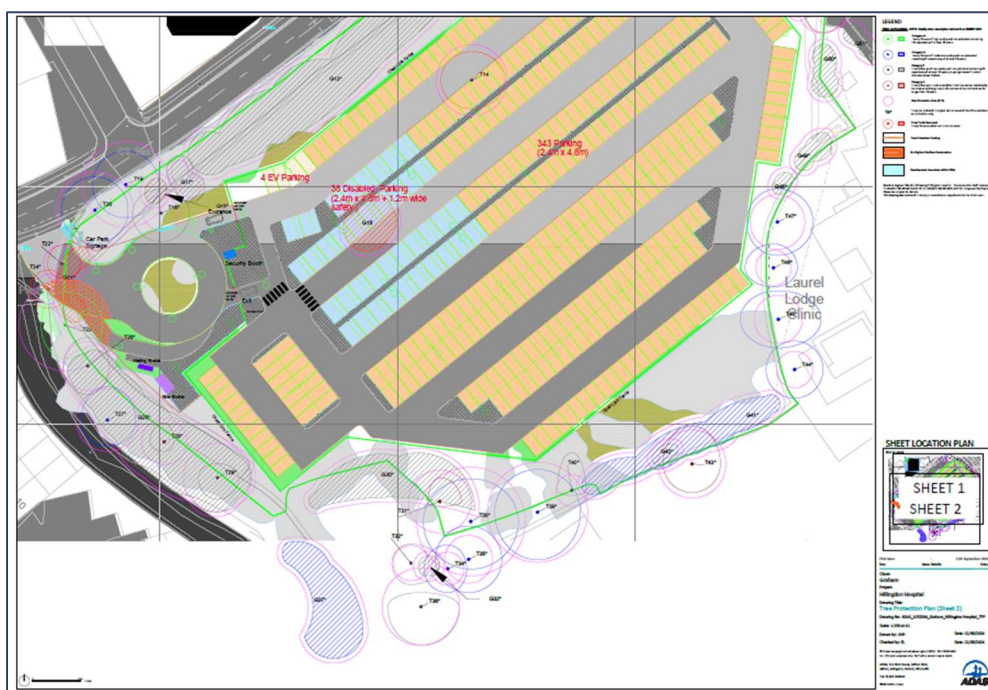


Figure 10 - Tree Protection Plan (Sheet 2) showing the location of tree protection fencing and no dig hard surface construction areas

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- 6.60 ADAS concluded that they were satisfied that with the recommendations followed, the development could take place without causing undue harm to the trees that have been identified for retention. The proposals are therefore acceptable in compliance with LP Policy G7 and LPP2 Policy DMHB14.

5) Residential Amenity

- 6.61 Policy DMHB 11 of the Development Management Policies (2020) and Policy BE1 of the Strategic Policies (2012) both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties, including a reduction in access to daylight and sunlight, or a loss of privacy or outlook.
- 6.62 In the pre-application advice (ref. 77070/PRC/2022/38) it was noted that *“as a result of the application site’s location, on the opposite side of the highway from the nearest residential properties and the existing mature landscaping at the site periphery, it is considered that the proposed development would have reduced adverse impact on residential amenity in terms of a loss of outlook, light or privacy.”* This is considered to remain the case with the current iteration of the proposals for the temporary car park at this site.

Noise

- 6.63 LPP1 Policy EM8 states that *“the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.”* In the pre-application advice (ref. 77070/PRC/2022/38) it was requested that a future planning application should be supported by a Noise Impact Assessment.
- 6.64 A Noise Impact Assessment has been prepared by RSK Acoustics. This involved undertaking a noise survey of the existing conditions at the nearest residential receptors as identified below:



Figure 11 – Aerial satellite image showing the location of the three nearest noise receptors

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6.65 Following this, predicted noise levels arising from cars passing, car door shutting and EV charging were calculated. Noise levels arising from these sources were found to remain definitively and robustly below existing noise levels derived from the noise survey. Therefore, the proposed temporary car park is deemed to be acceptable in noise terms and is therefore in compliance with Policy EM8.

Lighting

6.66 It is proposed to have lighting during dark hours to ensure there is adequate visibility for users. This has been carefully designed to also ensuring that neighbouring properties are not negatively impacted by light spill. The lighting will cover the general parking access areas.

6.67 The lighting will be controlled via wireless fixtures, with the times that this will be operating varying between the seasons. The lighting will be in compliance with CIBSE lighting guide LG6 and utilises energy efficient LED dimmable fittings.

6.68 As demonstrated by the lighting distribution study submitted. The houses on Field Heath Road are a sufficient distance away to not be impacted.

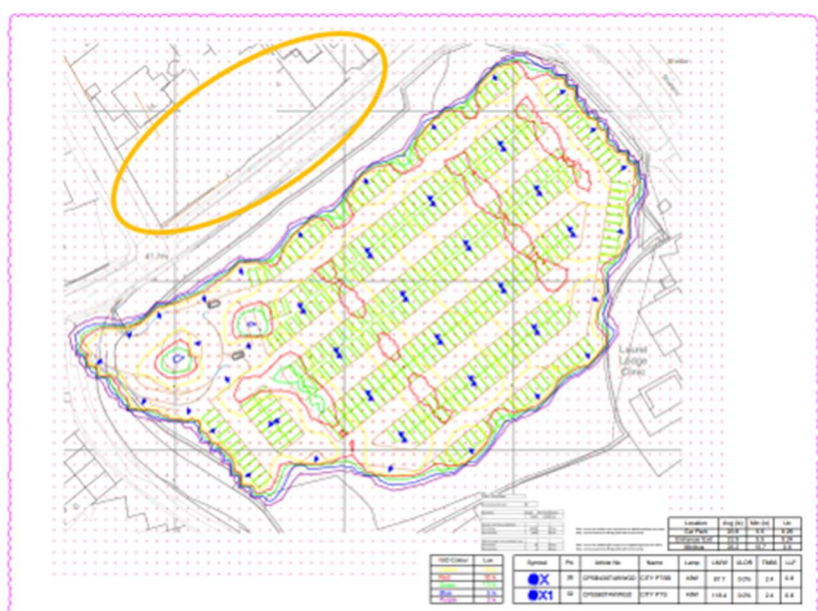


Figure 12 – Light levels distribution demonstrates that the houses fronting Field Heath Road (circled in orange) will not be impacted by the proposed lighting

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Security

- 6.69 As the car park will be used by staff 24/7, it is important that visitors feel safe using the facilities. Closed-circuit television will operate on site and due to the distance between the temporary car park and the main hospital, a security system will be linked to the hospital through radio frequency antennas. This will include antennas with receivers and antennas at both the car park and the hospital site to allow monitoring and control.
- 6.70 It is also proposed for a 2m high chain link fence to be constructed around the perimeter of the site. This will avoid any access into the site other than through the main barrier and gate.
- 6.71 A staff permit system will operate on the site and there will be clear signage indicating that it is designated for NHS staff parking only. There will be a security booth and parking wardens on site to ensure that only valid vehicles are present.
- 6.72 Full details of the proposed security measures are outlined in the Security Strategy prepared by Ingletton Wood accompanying this application. This demonstrates that the security and safety of users of the temporary car park have been well considered and the amenity of users will be protected.
- 6.73 Overall, it has been demonstrated that these proposals would protect the residential amenity of neighbouring properties for the duration of the car park being in operation. It has also been made evident that the users of the car park will be kept safe by the security and lighting strategy.

6) Flooding and Sustainable Drainage

- 6.74 NPPF paragraph 165 encourages that development is located in areas away from those areas at risk of flooding, and that where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 170 notes that application may need to be supported by a Flood Risk Assessment, and should not increase the risk of flooding elsewhere. It also notes that development should only be allowed in areas at risk of flooding where, in light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- 6.75 NPPF Annex 3 notes that 'car parks' are considered to be in the 'less vulnerable' flood risk vulnerability classification.
- 6.76 The Moorcroft Lane site is located within Flood Zone 1. A Flood Risk Assessment and SuDS has been prepared by LDE. This concluded that there is a very low risk of flooding at the site and that it is unlikely that there will be a substantial change to the risk of flooding as a result of climate change.

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- 6.77 In terms of SuDS, the existing situation is a site which is 100% permeable due to the greenfield nature of the Site. Due to the proposed use introducing hardstanding, there will be an increase in impermeable area and surface water runoff across the site. It will therefore be necessary to manage surface water on-site through conveyance towards the proposed point of discharge, whilst providing sufficient attenuation for all events up to the 1 in 100 year event inclusive of climate change.
- 6.78 The majority of the car park will be paved with an interlock grid permeable pavement with a gravel surface finish. This will allow for effective runoff infiltration, allowing the excess flows to be stored within the underlain coarse aggregate stone layers. At the roundabout, access will be drained via gullies and a slot drainage channel will be installed to prevent any runoff from leaving the site. The proposed SuDS features are designed to provide the required storage volume to retain the 1 in 100 plus 40% climate change event.

7) Air Quality

- 6.79 Policy SI 1 of the London Plan (2021) 'Improving air quality' states that development proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create an unacceptable risk of high levels of exposure to poor air quality.
- 6.80 The Council has declared an Air Quality Management Areas (AQMA) in the area from the southern boundary north to the border defined by, the A40 corridor from the western borough boundary, east to the intersection with the Yeading Brook north until its intersection with the Chiltern-Marylebone railway line, declared for nitrogen dioxide (NO₂). The proposed development site is located in the AQMA and in close proximity to the Hillingdon Hospital Air Quality Focus Area.
- 6.81 An Air Quality Impact Assessment (AQIA) has been prepared by RSK.
- 6.82 As the Temporary Car Park is accommodating vehicles that would have previously parked at the hospital, and it has been determined that there will be a reduction in the number of trips, it is considered unlikely that there will be any significant impacts on air quality during the operational phase.
- 6.83 There are no building emissions associated with the proposed development and therefore the proposed development is predicted to be better than 'air quality neutral' in respect of building emissions. The transport emissions associated with the proposed development are predicted to be less than the current emissions and therefore the proposed development is predicted to be better than 'air quality neutral' in respect of transport emissions.

Construction Phase

- 6.84 It has been found that the dust emission magnitude for earthworks, construction and track out is small. It is not anticipated that construction vehicles and plant will have a significant effect on local air quality. Appendix B of the AQIA outlines the recommended mitigation measures.
- 6.85 It has been determined that with the appropriate mitigation measures, the proposals comply with the relevant national and local policies and there are no air quality constraints.

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8) Contamination

- 6.86 Policy EM8 of the Strategic Policies Plan (2012) and Policy DMEI 13 of the DMP (2020) seeks to control the risk from contamination. Policy DMEI 12 of the DMP (2020) in particular states that the Council will support planning permission for development of land which is impacted by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be used safely through remediation.
- 6.87 Previously developed land is preferable for limiting the impact of development on the surrounding environment, and to restrict the need for extensive development.
- 6.88 A car park is at low risk for contamination. However, where contamination is known it is preferable to avoid such sites due to additional costs of construction of the trust.
- 6.89 The pre-application (ref. 77070/PRC/2022/38) requested that information would be required in an application to demonstrate that the site had undergone appropriate risk assessment in terms of land affected by contamination and in accordance with the proposed change of use to a temporary car park.
- 6.90 A Phase 1 and Phase 2 Geo-environmental and Geotechnical Interpretative Report has been prepared by RSK Geosciences. The key findings of the geo-environmental assessment found that there are no complete contaminant linkages at the site and therefore it is suitable for the development of the temporary car park.

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7. Conclusion

- 7.1 This Planning Statement supports a full planning application for a temporary car park on the Land at Moorcroft Lane, Pield Heath Road, Hillingdon.
- 7.2 Planning permission was granted in October 2023 for the comprehensive redevelopment of Hillingdon Hospital which will provide a new and improved hospital, alongside the provision of residential, commercial and business uses. In order for this permission to be implemented, and in line with the S106, a temporary car park is required for the duration of the works. This will allow the existing hospital to function whilst the works for the new hospital are carried out.
- 7.3 Following a pre-application meeting with Hillingdon Council in 2022, the Applicant team have undertaken a detailed site selection process which has found that the Moorcroft Lane site is the most suitable site for the temporary car park.
- 7.4 This application has also demonstrated that the site and proposals are acceptable in terms of landscape, ecology, residential amenity, transport and highways, flooding and drainage, air quality and contamination. Once the temporary car park has been removed, the site will be brought back into its previous use, however, it is also proposed to introduce landscape improvements that will result in a BNG. This will mean that the land at Moorcroft Lane can remain as a part of the Green Belt whilst contributing an extremely beneficial temporary use and become a high quality green space in the future.
- 7.5 Overall, the proposals align with the NPPF, London Plan and Hillingdon Local Plan. This will enable the approved proposals to redevelop the hospital to be realised which will deliver high quality healthcare, sustainable development and provide much needed housing.

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Appendix 1 – Site Planning History

Reference	Address	Proposal	Decision	Date
29006/APP/2023/3634	Moorcroft Farm, Moorcroft Lane, Hillingdon	Erection of a new agricultural building following demolition of existing agricultural building.	Approved	20/02/2024
4058/APP/2022/1788	Hillingdon Hospital Field Heath Road Hillingdon	Hybrid planning application for: FULL application seeking planning permission for demolition of existing buildings (excluding the Tudor Centre and the Old Creche) and redevelopment of the site to provide the new Hillingdon Hospital (Use Class C2), multi-storey car park and mobility hub, vehicle access, highways works, associated plant, generators, substation, new internal roads, landscaping and public open space, utilities, servicing area, surface car park/ expansion space, and other works incidental to the proposed development; and OUTLINE planning application (all matters reserved, except for access) for the demolition of buildings and structures on the remaining site (excluding the Grade II Listed Furze) for a mixed-use development comprising residential (Class C3) and supporting Commercial, Business and Service uses (Class E), new pedestrian and vehicular access; public realm, amenity space, car and cycling parking.	Approved	12/10/2023
75391/APP/2020/3190	2 Moorcroft Cottages, Moorcroft Lane, Hillingdon, UB8 3QL	Erection of a single storey rear extension, which would extend beyond the rear wall of the original house by no more than 4 meters, for which the maximum height would be no more than 3.03m and for which the height of the eaves would be no more than 2.85 meters	Prior Approval Not Required	03/12/2020
75391/APP/2020/491	2 Moorcroft Cottages, Moorcroft Lane, Hillingdon, UB8 3QL	Erection of a single storey rear extension, which would extend beyond the rear wall of the original house by 4 metres, for which the maximum height would be 2.9 metres, and for which the height of the eaves would be 2.9 metres	Refused	08/04/2020
61255/APP/2011/1322	3 Moorcroft Cottages, Moorcroft Lane, Hillingdon	Single storey rear extension (Application for a Certificate of Lawful Development for a Proposed Development)	Approved	27/07/2011
29006/G/95/1468	Moorcroft Farm, Moorcroft Lane, Hillingdon	Erection of a radio equipment cabin, 15 metre high steel lattice mast with antenna and microwave dish (Consultation under Schedule 2, Part 24 of the Town and Country Planning (General Permitted Development) Order 1995)	Approved	11/01/1996
29006/E/95/1115	Moorcroft Farm, Moorcroft Lane, Hillingdon	Erection of a radio base station including 22.5 metre tower, equipment cabin and security fencing	Refused	20/01/1997
29006/F/95/1020	Moorcroft Farm, Moorcroft Lane, Hillingdon	Erection of a radio equipment cabin, 15 metre high steel lattice mast and cellnet antennae (Consultation under Schedule 2, Part 24 of the Town and Country Planning (General Permitted Development) Order 1995)	Prior Approval Required	08/09/1995
29006/C/92/1233	Moorcroft Farm, Moorcroft Lane, Hillingdon	Erection of a radio base station, including a 22.5 metre high telecommunication tower, equipment cabin and security fencing	Withdrawn	19/11/1992