

## DELEGATED DECISION

- Please select each of the categories that enables this application to be determined under delegated powers  
 - Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.

<b>APPROVAL RECOMMENDED: GENERAL</b>		Select an Option
1.	No valid planning application objection in the form of a petition of 20 or more signatures, has been received	<input type="checkbox"/>
2.	Application complies with all relevant planning policies and is acceptable on planning grounds	<input type="checkbox"/>
3.	There is no Committee resolution for the enforcement action	<input type="checkbox"/>
4.	There is no effect on listed buildings or their settings	<input type="checkbox"/>
5.	The site is not in the Green Belt (but see 11 below)	<input type="checkbox"/>
<b>REFUSAL RECOMMENDED: GENERAL</b>		
6.	Application is contrary to relevant planning policies/standards	<input type="checkbox"/>
7.	No petition of 20 or more signatures has been received	<input type="checkbox"/>
8.	Application has not been supported independently by a person/s	<input type="checkbox"/>
9.	The site is not in Green Belt (but see 11 below)	<input type="checkbox"/>
<b>RESIDENTIAL DEVELOPMENT</b>		
10.	Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha	<input type="checkbox"/>
11.	Householder application in the Green Belt	<input type="checkbox"/>
<b>COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT</b>		
12.	Change of use of retail units on site less than 1 ha or with less than 1000 sq. m other than a change involving a loss of A1 uses	<input type="checkbox"/>
13.	Refusal of change of use from retail class A1 to any other use	<input type="checkbox"/>
14.	Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.	<input type="checkbox"/>
<b>CERTIFICATE OF LAWFULNESS</b>		
15.	Certificate of Lawfulness (for proposed use or Development)	<input type="checkbox"/>
16.	Certificate of Lawfulness (for existing use or Development)	<input type="checkbox"/>
17.	Certificate of Appropriate Alternative Development	<input type="checkbox"/>
<b>CERTIFICATE OF LAWFULNESS</b>		
18.	ADVERTISEMENT CONSENT (excluding Hoardings)	<input type="checkbox"/>
19.	PRIOR APPROVAL APPLICATION	<input type="checkbox"/>
20.	OUT-OF-BOROUGH OBSERVATIONS	<input type="checkbox"/>
21.	CIRCULAR 18/84 APPLICATION	<input type="checkbox"/>
22.	CORPSEWOOD COVENANT APPLICATION	<input type="checkbox"/>
23.	APPROVAL OF DETAILS	<input type="checkbox"/>
24.	ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where the Heads of Terms have already received Committee approval	<input type="checkbox"/>
25.	WORKS TO TREES	<input type="checkbox"/>
26.	OTHER (please specify)	<input type="checkbox"/>

**The delegation powers schedule has been changed. Interim Director of Planning, Regeneration & Public Realm can determine this application**

Case Officer:

Signature:

Date:

**A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informative's are satisfactory.**

Team Manager:

Signature:

Date:

**The decision notice for this application can be issued.**

**Director / Member of Senior Management Team:**

Signature:

Date:

**NONE OF THE ABOVE DETAILS SHOULD BE USED IN THE PS2 RETURNS ODPM**

**Item No.**                      **Report of the Head of Development Management and Building Control**

**Address:**                      HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX

**Development:**                Removal of existing generator and associated equipment serving Substations 2 and 3, and installation of new replacement generators with associated works.

**LBH Ref Nos:**                **9011/APP/2025/2502**

**Drawing Nos:**                1 9 3 3-D B C-S 2-0 0-D R-A-0 0 0 1 REV P05  
1933-DBC-ZZ-00-DR-A-0300 P05  
1933-DBC-ZZ-00-DR-A-0301 REV P05  
1933-DBC-ZZ-00-DR-A-0313 REV P02  
1933-DBC-ZZ-00-DR-A-0314 P01  
1933-DBC-ZZ-00-DR-A-0325 REV P02  
1 6 2 2-D B C-Z Z-0 0-D R-A-0310  
Design and Access statement  
1933-DBC-S2-XX-DR-A-0002 REV P03  
Cover Letter  
Air Quality Assessment  
Preliminary Ecological Assessment  
Noise impact assessment

**Date Plans received:**    26-09-25                      **Date(s) of Amendments(s):**

**Date Application valid**    26-09-25

## 1. SUMMARY

The application seeks planning permission for the removal of an existing emergency generator and associated equipment serving Substations 2 and 3 at Harefield Hospital, and the installation of two replacement containerised generators with associated plant and a new fenced compound. The works are required to address failures and obsolescence in the existing standby power provision and to secure a resilient emergency power supply for the hospital.

The proposals would increase the extent and height of built plant, which necessitates the partial removal of a low-value tree group, and introduction of additional palisade fencing within an established tree belt, resulting in a low level of harm to Green Belt openness, the Conservation Area and the site's landscape character. However, supporting evidence demonstrates that alternative locations within the hospital campus are severely constrained and that the chosen site is the least harmful and most operationally workable option. Noise and air quality impacts have been assessed and are considered acceptable and there are no highway objections. Substantial weight is afforded to the public benefits of upgrading critical hospital infrastructure, and having regard to

the strong national and local policy support for essential public service infrastructure, the limited identified harms are considered to be clearly outweighed and the scheme is recommended for approval, subject to conditions.

## 2. RECOMMENDATION

### APPROVAL subject to the following:

#### 1. COM3 Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

#### REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

#### 2. COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans and reports, numbers:

1933-DBC-S2-00-DR-A-0001 P05  
1933-DBC-S2-XX-DR-A-0002 P03  
1933-DBC-ZZ-00-DR-A-0300 P05  
1933-DBC-ZZ-00-DR-A-0301 P05  
1933-DBC-ZZ-00-DR-A-0313 P02  
1933-DBC-ZZ-00-DR-A-0314 P01  
1933-DBC-ZZ-00-DR-A-0325 P02  
1622-DBC-ZZ-00-DR-A-0310 P04

and shall thereafter be retained/maintained for as long as the development remains in existence.

#### REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

#### 3. OM19 Construction Management Plan

Prior to development commencing, the applicant shall submit a demolition and construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).

- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

#### REASON

To safeguard the amenity of surrounding areas in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan.

#### 4. NONSC Construction Environmental Mgmt Plan (CEMP)

All demolition, site clearance and construction works shall be carried out in full accordance with the approved Construction Environmental Management Plan (CEMP) (Biodiversity) by Bradley Murphy Design Ltd, ref. BMD.25.0201.RPE.MP.001, dated November 2025, including all ecological protection, supervision, pollution control and species safeguarding measures set out therein.

The approved CEMP shall be adhered to and implemented throughout the construction period of the development.

#### REASON

To minimise impacts on habitats and species and to safeguard the environment during construction, including the protection of nearby ancient woodland and sensitive habitats, in accordance with Policy G6 of the London Plan (2021), Policy EM7 of the Hillingdon Local Plan Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020) and Paragraph 187 of the National Planning Policy Framework (2024).

#### 5. COM8 Tree Protection

All tree protection measures shall be installed and all works carried out strictly in accordance with the submitted Arboricultural Impact Assessment by Middlemarch, ref. RT-MME-180902-02 Rev A, dated August 2024 and the Arboricultural Method Statement by Middlemarch, ref. RT-MME-183677-01, dated October 2025, including the Tree Protection Plan (drawing no. C183677-01-01). Protective fencing shall be erected before any demolition, site clearance or construction works commence and shall be retained for the duration of the works. No materials, plant, soil or waste shall be stored within the Root Protection Areas of retained trees.

#### REASON

To protect retained trees which contribute to the character and appearance of the area and the Conservation Area, in accordance with London Plan (2021) Policy G7 and Policies DMHB 11, DMHB 14 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020).

#### 6. NONSC Acoustic Enclosures

The generators and associated plant hereby approved shall be installed with the acoustic enclosures, silencers and flue arrangements specified in the approved Noise Impact Assessment by Hoare Lea, ref. 1016320-HLE-RP-AC Rev 01, dated 12/09/2025, and on the approved plans, and shall thereafter be retained and maintained for the lifetime of the development. No alternative generators or plant with higher sound power levels shall be installed without the prior written approval of the Local Planning Authority.

## REASON

To ensure the plant operates as assessed and to safeguard the amenity of nearby residents and hospital users, in accordance with London Plan (2021) Policy D14 and Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

### 7. RES15 Sustainable Water Management

The development hereby approved shall be carried out and retained in accordance with the approved Flood Risk Assessment and Drainage Strategy by Meinhardt, ref. 4279-MHT-CV-RP-0001, dated 15 September 2025, and the surface water drainage measures set out therein, including the use of infiltration trenches / permeable sub-base and on-site attenuation sufficient to accommodate events up to the 1 in 100 year storm plus climate change allowance. The approved drainage measures shall be installed prior to first operation of the generators and shall thereafter be retained and maintained for the lifetime of the development.

## REASON

To ensure the development does not increase the risk of flooding in accordance with Policy DME1 10 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policy S15.

### 8. NONSC Hours of Testing

Testing of the generators shall not occur more than once per calendar month and shall only occur between the hours of 09:00 to 17:00 Monday to Friday (excluding Bank Holidays), with a testing period not exceeding a total of three hours on any test day.

## REASON

To ensure no undue noise impacts occur to adjacent noise sensitive receivers in accordance with Policy D14 of the London Plan (2021) and Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

### 9. NONSC Biodiversity Gain Plan

No development shall take place on any part of the site until a Biodiversity Gain Plan for the site, demonstrating compliance with the 10% biodiversity net gain requirement in accordance with the Environment Act 2021, has been submitted to and approved in writing by the Local Planning Authority.

The Biodiversity Gain Plan should include:

- i. Baseline Biodiversity Assessment: Using the latest Defra Biodiversity Metric, a report of the site's predevelopment biodiversity value; and
- ii. On-Site Enhancement and 30-year Habitat Management Plan (HMP) detailing measures to achieve BNG on-site, including species protection, habitat creation, and ongoing management strategies to maintain gains for a minimum of 30 years. The HMP should, as a minimum, include:
  - a) Description and evaluation of the features to be managed.
  - b) Aims, objectives and targets for management.
  - c) Description of the management operations necessary to achieving aims and objectives.
  - d) Prescriptions for management actions.
  - e) Preparation of a works schedule, including an annual works schedule.
  - f) Details of the monitoring needed to measure the effectiveness of management.
  - g) Details of the timetable for each element of the monitoring programme.

h) Details of the persons responsible for the implementation and monitoring.

i) Report to the Council routinely regarding the state of the Biodiversity Net Gain requirements for development in years 1 (post-completion), 3, 5, 10, 20, and 30, with biodiversity reconciliation calculations at each stage; or

Where a biodiversity net gain of 10% is not achievable on site, in addition to the Baseline Biodiversity Assessment

(i), the following shall be included in the BGP:

iii. Off-Site Biodiversity Credits or Statutory Credits: Where on-site measures do not achieve the 10%

net gain, confirmation of the purchase of off-site biodiversity credits or statutory credits must be provided, including a receipt or proof of transaction as part of the Plan.

The approved Biodiversity Gain Plan shall be strictly adhered to, and development shall commence and operate in accordance with it.

#### REASON

To ensure the development delivers a Biodiversity Net Gain and secures the protection and effective management of the remaining habitat on site in accordance with Section 15 of the National Planning

## INFORMATIVES

### 1. I99 Unexpected Contaminated Land

In the event that contamination is found at any time when carrying out the development that was not previously identified, the applicant is advised to cease works in the affected area and contact the Local Planning Authority and an appropriately qualified contaminated land specialist without delay. Appropriate investigation and, where necessary, remediation should then be undertaken in accordance with current best practice and relevant guidance, to ensure the site is suitable for its intended use and to protect human health and the environment.

### 2. I52 Compulsory Informative (1)

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

### I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The

London Plan (2021) and national guidance.

NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D14	(2021) Noise
LPP S2	(2021) Health and social care facilities
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP HC1	(2021) Heritage conservation and growth
LPP G2	(2021) London's Green Belt
LPP SI1	(2021) Improving air quality
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP T4	(2021) Assessing and mitigating transport impacts
BE1	Development within archaeological priority areas
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EM6	(2012) Flood Risk Management
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 11	Design of New Development
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 2	Reducing Carbon Emissions
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMEI 4	Development on the Green Belt or Metropolitan Open Land

DMEI 14	Air Quality
DMCI 2	New Community Infrastructure
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts

### 3. CONSIDERATIONS

#### 3.1 Site and Locality

Harefield Hospital is located off Hill End Road in Harefield. The hospital occupies an extensive campus comprising a mixture of historic and modern clinical buildings, plant, internal access roads, parking and landscaped areas. The site lies within the Metropolitan Green Belt, the Harefield Village Conservation Area and an Archaeological Priority Area, and includes the Children's Wing of the main block which is a locally listed building.

The application site is situated towards the south-eastern edge of the hospital campus, adjacent to the internal access road that runs parallel to Rickmansworth Road. This part of the site currently accommodates an existing standby generator and associated plant on an area of hardstanding, set behind a belt of trees and vegetation which forms a strong green boundary between the hospital and the residential properties on Rickmansworth Road and Vernon Drive, approximately 30m to the east.

#### 3.2 Proposed Scheme

The application seeks planning permission for the removal of the existing generator and associated obsolete equipment, and the installation of two new containerised standby diesel generators, a bulk fuel tank and associated control equipment within a new compound. The equipment would be housed within acoustically attenuated containers, generally around 3m high, with flues measuring approximately 7-10m in height. The compound itself would extend over an area of approximately 300sqm, including around 152sqm of plant footprint, and would be enclosed by 2.4m high dark-green palisade fencing.

The works also include associated below-ground infrastructure to connect to Substations 2 and 3 and removal of part of a low-value tree group along the eastern boundary to accommodate the extended plant area. The generators are designed to operate for limited daytime testing (up to three hours once per month) and in emergency mains-failure events only.

#### 3.3 Relevant Planning History

9011/APP/2025/2481      HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
 Details pursuant to the discharge of Condition 4 (Demolition and Construction Management Plan) of planning permission ref. 9011/APP/2024/3347, dated 27-05-25 (Removal of existing fuel tank/generator equipment (and associated structures and installations) and installation of new replacement generator equipment (including associated flue) and associated works.)

**Decision:** 19-11-2025      Approval

- 9011/APP/2024/3347 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Removal of existing fuel tank/generator equipment (and associated structures and installations) and installation of new replacement generator equipment (including associated flue) and associated works.  
**Decision:** 27-05-2025 Approval
- 9011/APP/2024/2134 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Replacement of existing 1no 3.5m stub tower and 6no. existing antennas with 1no. new 6m stub tower accommodating 6no. new antennas, internal upgrade of the existing cabin, installation of 1no. new GPS node with associated ancillary works.  
**Decision:** 22-10-2024 Approval
- 9011/APP/2022/2378 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Retrospective installation of an electrical generator alongside the erection of substation enclosure and supporting ancillary works.  
**Decision:** 30-09-2022 Approval
- 9011/APP/2022/1778 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Erection of a substation enclosure to enable installation of an SSN electrical generator (General Permitted Development Order 2015 (as amended) Schedule 2, Part 15, Class b(e) and (f) Prior Approval for the erection of a building for electricity undertakings)  
**Decision:** 08-07-2022 Withdrawn (P)
- 9011/APP/2022/1528 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Details pursuant to Condition 4 (Landscape Scheme) of planning permission ref. 9011/APP/2021/4365 dated 11/02/2022: Temporary permission (5 years) for a MRI unit, including a single MRI Unit, control room, examination room, tech room and plant room and associated timber walkway to include a reporting office, cleaners store and a linen store with associated works.  
**Decision:** 06-07-2022 Approval
- 9011/APP/2021/4440 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Demolition of walkway between the PSU and Heart and Science Centre.  
**Decision:** 11-03-2022 Refusal
- 9011/APP/2021/4395 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Demolition of walkway between the PSU and Heart and Science Centre.  
**Decision:** 17-12-2021 No Further Action(P)
- 9011/APP/2021/4365 HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Temporary permission (5 years) for a MRI unit, including a single MRI Unit, control room, examination room, tech room and plant room and associated timber walkway to include a reporting office, cleaners store and a linen store with associated works.

**Decision:** 11-02-2022      Approval

9011/APP/2020/1598      HAREFIELD HOSPITAL HILL END ROAD HAREFIELD MIDDLESEX  
Details pursuant to Conditions 3 (tree protection), 4 (landscaping) and 5 (drainage plan) of  
planning permission Ref: 9011/APP/2019/4072, dated 20-03-20 (Creation of 2 formal hospital  
gardens including planting, furniture and paths)

**Decision:** 23-06-2020      Approval

### **Comment on Planning History**

Numerous applications have been submitted for various extensions to the hospital over the years.  
The recent planning history is listed above.

## **4. Advertisement and Site Notice**

4.1      Advertisement Expiry Date: **26th November 2025**

4.2      Site Notice Expiry Date:      Not applicable

## **5. Comments on Public Consult**

### **EXTERNAL CONSULTEES:**

84 surrounding properties have been consulted on 22-10-2025 with the consultation period expiring  
on 12-11-2025.

No responses have been received to the public consultation.

### **INTERNAL CONSULTEES:**

LBH Conservation and Urban Design Specialist: The site of the proposed generators is within the  
Harefield Village Conservation Area and falls within the designated Green Belt. The site is also on  
the edge of part of the historic Listed Building. Along Rickmansworth Road, a continuous belt of  
mature trees defines the boundary of the hospital site. This green edge contributes significantly to  
the verdant character of the Harefield Village Conservation Area, one of its key defining features.

The proposed generators are mostly around 3m but with elements of approximately 7m and 10m  
with boundary fencing at 2.4m high. The location of the development requires the clearance of part  
of a key green infrastructure feature within the Green Belt and visible from part of the Locally Listed  
building. The proposed generator location does not take advantage of the existing base and  
position of the current generators, which would result in less disturbance to the tree belt. While it is  
acknowledged that part of the existing generators lies within the root protection zone of a Category  
A tree, this was evidently considered acceptable in the past.

The removal of part of a tree group that contributes to the Conservation Area with built form in the  
Green Belt will result in harm to the Green Belt, the nearby heritage asset of the locally listed  
building and green infrastructure feature that is characteristic of the Conservation Area. Concern is  
raised that the ongoing pattern of incremental planning applications submitted for Harefield Hospital

may appear minor in isolation, together they represent a significant and cumulative impact on the locally listed building and its setting. It is recommended that Instead of continual submission of small-scale interventions a masterplan would better integrate the future needs of the hospital.

The Arboricultural Impact Assessment and or the proposals lacks mitigation replacement tree planting in line with the London Plan Policy G7 Trees and Woodlands states: "Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-Tree or CAVAT, or another appropriate valuation system." Accordingly, a plan showing the mitigation tree planting needs to be provided based on the value of the existing trees to be removed.

In summary, we object to this planning application and recommend that an alternative site be considered, one that would better limit the proposed generators' impact on the Green Belt, the locally listed building, the Conservation Area, and the surrounding green infrastructure.

Planning Officer Response: The comments of the Conservation and Urban Design Officer are noted. The concerns raised in respect of Green Belt, heritage impact, tree loss, cumulative change and the absence of replacement planting are addressed in the Green Belt, Heritage, Trees/Landscaping and BNG sections of this report. For the reasons set out, it is considered that the proposal would result in a low level of harm, which is outweighed by the significant public benefits associated with providing essential emergency power infrastructure for the hospital.

LBH Highways: No objection subject to a condition securing a construction management plan.

LBH Contaminated Land Officer: No objection, subject to a land contamination informative.

LBH Noise Specialist: Given the nature and context of the proposed development apparent from the information provided I do not consider noise and vibration to be a material planning issue.

LBH Air Quality Specialist: The two proposed diesel backup generators are for life saving purposes and outside both the AQMA and any Focus Area - therefore the LBH considers the development air quality neutral and no additional mitigation is required in this instance.

Greater London Archaeological Advisory Service: Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: Area: Harefield North

Although within the Harefield North Archaeological Priority Area the proposed development is small-scale and not in a location likely to harm assets of archaeological interest.

No further assessment or conditions are therefore necessary.

## 6. Local Plan Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.HE1	(2012) Heritage
PT1.CI1	(2012) Community Infrastructure Provision
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise

Part 2 Policies:

NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D14	(2021) Noise
LPP S2	(2021) Health and social care facilities
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP HC1	(2021) Heritage conservation and growth
LPP G2	(2021) London's Green Belt
LPP SI1	(2021) Improving air quality
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP T4	(2021) Assessing and mitigating transport impacts
BE1	Development within archaeological priority areas
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EM6	(2012) Flood Risk Management
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 11	Design of New Development
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 2	Reducing Carbon Emissions
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 14	Air Quality
DMCI 2	New Community Infrastructure
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts

In addition: Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)  
The Local Plan: Part 2 - Development Management Policies (2020)  
The Local Plan: Part 2 - Site Allocations and Designations (2020)  
The West London Waste Plan (2015)  
The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2024) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

## **7. MAIN PLANNING ISSUES**

### **7.1 Impact on the amenities of the occupiers of neighbouring residential properties**

Paragraph 135 f) of the NPPF and Policy D3 of the London Plan outline the importance of planning in securing good standards of amenity for existing and future occupiers of land and buildings. Policy DMHB 11 of the Hillingdon Local Plan Part 2 seeks to ensure that new development does not result in a detrimental impact upon adjacent properties and their amenity space in terms of outlook, privacy, amenity, noise and daylight / sunlight. London Plan Policy D14 seeks to ensure that development proposals reduce, manage and mitigate noise avoid significant adverse noise impacts on health and quality of life.

The main issue with regards to residential amenity is the impact of noise generated by the development. The site lies within a predominantly residential area, with the closest dwellings on Vernon Drive and Rickmansworth Road located approximately 30m from the application site boundary. Given the separation distance, it is not considered that there would be any significant harmful effects in terms of outlook, privacy or daylight / sunlight. Furthermore, the proposed development would be screened from view by mature trees on the eastern boundary of the wider hospital site.

In terms of noise, the submitted Noise Impact Assessment confirms that baseline noise levels were established from long-term monitoring undertaken in 2024. The assessment has been carried out in accordance with the manufacturer's data for the two proposed containerised generators. The generators are expected to run together for up to three hours once per month during weekday daytime periods for testing, and otherwise only under emergency mains-failure conditions.

Predicted facade levels at the nearest dwellings during testing gave a combined rating level that is equal to the adopted daytime background level and therefore indicative of a "low impact" under BS 4142 (industry standard for rating and assessing industrial and commercial sound). In a worst-case emergency scenario situation, when the generators could operate at night, the cumulative rating

level at the nearest dwellings is predicted to be approximately 5 dB above the conservative night-time background level, which corresponds to a potential "adverse" impact in strict BS 4142 terms. However, the report notes that: (i) emergency running would be infrequent and of limited duration; (ii) background noise levels in the immediate vicinity of the hospital are likely to be higher than those adopted from the quieter northern position; and (iii) even with partially open bedroom windows, internal levels are expected to remain within the recommended night-time guideline values.

Having regard to this context and the life-safety role of the equipment, such short-term emergency operation is not considered to give rise to a significant adverse effect on residential amenity. The assessment also demonstrates that predicted internal noise levels within nearby hospital buildings would remain below the day and night time criteria set out in Department of Health / NHS guidance, such that the plant would not prejudice the functioning of noise-sensitive medical uses on the site.

On this basis, and subject to conditions securing acoustic enclosures, the restriction of routine testing to weekday daytime hours and to a maximum of three hours per month and an upper limit on plant rating levels at the nearest residential facades in line with the submitted predictions, it is considered that the proposed generators would not result in unacceptable noise impacts on neighbouring occupiers. The development would therefore accord with Policy DMHB 11 of the Hillingdon Local Plan Part 2, London Plan Policies D3 and D14 and paragraph 135 f) of the NPPF in respect of residential amenity.

## **7.2 Impact on Street Scene**

Paragraph 135 of the NPPF, Policy D4 of the London Plan, Policy BE1 of the Hillingdon Local Plan Part 1 and Policy DMHB 11 of the Hillingdon Local Plan Part 2 collectively seek high-quality design which respects local character and the visual amenity of the street scene, including within designated areas such as the Harefield Village Conservation Area. The site lies on the south-eastern edge of the hospital campus adjacent to Vernon Drive / Rickmansworth Road and currently accommodates an existing emergency generator and associated plant on an area of hardstanding, set behind a substantial belt of trees and vegetation that forms the visual edge of the hospital in longer views from Rickmansworth Road.

The proposal would replace the existing generator with two larger containerised units, associated bulk fuel tank and control equipment within a new fenced compound. The compound boundary would comprise 2.4m high palisade fencing finished in dark green to match existing fencing on the hospital site, with the plant and flues set behind this enclosure.

The development would also require clearance of part of the existing vegetated strip, although the submitted DAS and Planning Statement confirm that the extent of vegetation removal has been reduced through design iteration, with a substantial tree and vegetation buffer retained between the compound and the residential frontage on Rickmansworth Road.

In public views from Rickmansworth Road the retained tree belt will continue to provide effective screening such that the generators and fencing would be largely concealed, with only limited or filtered views of upper elements and flues during winter months. The Planning Statement states that this screening will result in "little to no view of the proposed plant equipment" from Rickmansworth Road, and that the site is perceived as a service/plant edge to the working hospital rather than part of the formal civic frontage. Given the set-back position within the wider hospital site, the backdrop of existing hospital buildings and the continuation of an established fencing typology and colour, it is considered that the proposal would read as part of the internal service infrastructure of the hospital and would not appear unduly prominent in the wider street scene.

Some harm would arise from additional built form, the intensification of utilitarian plant and the introduction of additional palisade fencing within a conservation area setting, together with the localised erosion of the vegetated edge. However, this impact is limited in extent and is mitigated by the retained tree belt and can be further softened through replacement planting and landscape management, to be secured by condition. On balance, the proposal is therefore considered to preserve the overall character and appearance of the street scene when viewed from Rickmansworth Road and Vernon Drive and to comply with the above reference policies.

### **7.3 Traffic Impact/Pedestrian Safety**

Policy DMT 1 of the Hillingdon Local Plan Part 2 states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

The Council's Highways Officer has reviewed the application and has confirmed that the only highway-related matter is ensuring that the scheme's construction does not disrupt the surrounding highway network. As such, a Construction Management condition is attached.

Subject to the attached condition, the proposal would meet the transport needs of the development and it complies with Policy DMT 1 of the Hillingdon Local Plan Part 2.

### **7.4 Carparking & Layout**

See above section 'Traffic Impact/Pedestrian Safety'.

### **7.5 Urban Design, Access and Security Considerations**

Relevant planning considerations are dealt with in other sections of this report.

### **7.6 Other Issues**

PRINCIPLE OF DEVELOPMENT:

The application site is located within the Green Belt wherein London Plan Policy G2 and Policy DMEI 4 of the Hillingdon Local Plan Part 2 state that development in the Green Belt will not be permitted unless there are very special circumstances and that redevelopment will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and the purposes of including land within it, than the existing development. Section 13 of the NPPF states that development in the Green Belt is inappropriate unless one of a number of exceptions applies, including paragraph 154 g): "limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt."

The submitted Planning Statement states that the proposed development also qualifies as 'Grey Belt' under the December 2024 NPPF changes and that the proposal meets all of paragraph 155's criteria for development in Grey Belt (use of Grey Belt land, demonstrable need for the infrastructure, sustainable location etc.), thus should not be regarded as inappropriate development. The applicant has also advanced a 'very special circumstance' case based on the critical need to secure resilient emergency power for the hospital and patient safety.

Whilst regard is given to Policy DMEI4, greater weight is given to the December 2024 NPPF, as this is more recent and represents the current Government policy on Green Belt openness.

In the context of paragraph 154 g), previously developed land (PDL) is defined in Annex 2 of the NPPF as 'land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land

(although it should not be assumed that the whole of the curtilage should be developed).'

#### - Impact on Openness

According to paragraph 153 of the NPPF, when considering applications for development in the Green Belt, local planning authorities are required to ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. However, paragraph 153 is caveated by footnote 55, which states "other than in the case of development on previously developed land or grey belt land, where development is not inappropriate". Therefore, where the redevelopment of PDL is proposed, provided that the scheme does not cause 'substantial' harm to Green Belt openness (and is thus appropriate), then the local planning authority need not consider any other harm to the Green Belt (e.g. conflict with Green Belt purposes, visual harm etc.).

The below assessment will consider whether the proposed redevelopment would cause substantial harm to the openness of the Green Belt. According to the NPPF, the fundamental aim of Green Belt policy is to prevent urban sprawl and safeguard the countryside from encroachment by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. The concept of openness relates to the lack of development or built form - as distinct from the absence of visual impact. However, it has been well-established by case law that the openness of the Green Belt has a visual aspect as well as a spatial aspect. As such, the impact of a proposal on the openness of the Green Belt should be assessed taking into account both its spatial and visual impact.

The site currently accommodates an established emergency generator and associated plant on an area of hardstanding (65 sqm) within the wider developed hospital complex, together with an area of vegetation which forms part of a belt of trees along the eastern edge of the campus. The proposal would remove the existing plant and provide two larger containerised generators and associated equipment within a new fenced compound (plant area of 152 sqm within a compound of 300 sqm), together with associated cabling and an area of vegetation clearance (343 sqm). The Planning Statement identifies the site as PDL for the purposes of Annex 2 of the NPPF and argues that the scheme amounts to the partial redevelopment of PDL under paragraph 154 g), such that it should not be regarded as inappropriate development provided it does not cause substantial harm to openness.

From the Council's perspective, the proposal would increase the overall amount and height of built plant and introduce palisade fencing into an area that is currently partly vegetated, resulting in some loss of spatial and visual openness at the very edge of the hospital site. However, this harm would be localised, contained within an established service/plant corridor already characterised by hospital buildings and hardstanding, and largely screened in views from Rickmansworth Road by the retained tree belt. Having regard to the previously developed nature of the site, the functional need for adjacency to Substations 2 and 3, and the limited extent of encroachment into the vegetated buffer, it is considered that the proposal represents the redevelopment of PDL which would result in a greater spatial impact on Green Belt openness by virtue of the increase in built form, however it is not considered that the impact would be substantial when both spatial and visual aspects are weighed up. On balance, the proposal is therefore regarded as appropriate development within the Green Belt for the purposes of NPPF paragraph 154 g) and compliant with policy DMEI 4.

Weight is also given to the submitted options appraisal which demonstrates that alternative locations within the hospital campus were assessed but discounted on operational and technical grounds (see below 'Alternative Locations within the Hospital Site'). The submitted documents support the conclusion that the chosen location represents the least harmful and most operationally

efficient site for the required plant within the developed hospital estate. Even if a contrary view were taken and the proposal were judged to be inappropriate development that would substantially harm Green Belt openness, the very significant public benefits associated with securing a resilient emergency power supply for a regional specialist hospital (as set out further below) would amount to very special circumstances that would clearly outweigh that limited harm, consistent with NPPF paragraph 153 and Policy G2.

#### - Public Service Infrastructure

Paragraph 101 of the NPPF requires decision-makers to give significant weight to the importance of new, expanded or upgraded public service infrastructure, including hospitals, when considering planning applications. The proposal comprises the replacement and upgrade of the hospital's standby generators serving Substations 2 and 3, in response to failures in the existing equipment, non-compliance with current standards and reliance on temporary hire sets which have been subject to vandalism and theft, placing critical clinical operations at risk. The works are therefore essential to ensure continuity of power to intensive care, theatres and other life-safety services in the event of mains failure.

At the strategic level, London Plan Policy S2 supports the provision and enhancement of high-quality health and social care facilities and Local Plan Policy DMCI 2 supports the refurbishment and re-use of existing premises for community facilities, which includes hospital infrastructure.

Taken together, national policy and the Development Plan place strong support behind necessary upgrades to public service infrastructure of this nature. Having regard to the need for the replacement generators and the fact that the development is confined to an existing plant area within the hospital campus, it is considered that the principle of the proposed generator replacement is acceptable in land use terms.

#### - Alternative Locations within the Hospital Site

The applicant has demonstrated that alternative locations across the wider hospital campus have been considered and reasonably discounted. The proposed generators are required to serve Substations 2 and 3 and must comply with the Department for Health's 'Health Technical Memorandum 06-01: Electrical services supply and distribution', which imposes strict limitations on cable length, earthing arrangements and fault protection. As set out in the submitted Design and Access Statement, this results in a preferred maximum cable radius of approximately 100m from the substations, beyond which electrical performance, resilience and safety could be compromised. Large parts of the hospital site therefore fall outside acceptable operational parameters. In addition, the scale of the generators, associated fuel tanks and control equipment necessitates a sufficiently sized compound, which is not available in many other areas of the site without encroachment into sensitive landscaped areas or interference with existing buildings and access routes. The chosen location re-uses an area already associated with generator infrastructure, thereby minimising the extent of new development and avoiding the unnecessary dispersal of plant across the site. On this basis, it is considered that the proposed siting represents the most appropriate and least harmful option within the hospital estate.

#### - Conclusion on Principle of Development

Taking the above into account, it is concluded that the proposal represents the partial redevelopment of previously developed land within the established hospital complex which, while increasing the quantum of plant and introducing a fenced compound, would not result in substantial harm to the spatial or visual openness of the Green Belt. It therefore falls within the exception at

paragraph 154 g) of the NPPF and is regarded as appropriate development, compliant with London Plan Policy G2 and Policy DMEI 4 of the Hillingdon Local Plan Part 2. Significant weight is also afforded to the need for upgraded public service infrastructure under paragraph 101 of the NPPF, London Plan Policy S2 and Policy DMCI 2, given the critical role of the generators in maintaining safe, continuous operation of Harefield Hospital. Even if a contrary view were taken and the scheme were judged to be inappropriate development, the very substantial public benefits of securing a resilient emergency power supply for this specialist regional hospital would amount to very special circumstances sufficient to clearly outweigh any Green Belt harm. Accordingly, the principle of development is considered acceptable, subject to the detailed matters addressed in this report.

## IMPACT ON HERITAGE ASSETS

The application site is located within Harefield Village Conservation Area, wherein Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that local authorities should have special regard to preserving or enhancing the character and appearance of Conservation Areas. The site is also within 50m of the Children's Wing of the main block of the hospital, which is a locally listed building, i.e. a non-designated heritage asset, and within an Archaeological Priority Area.

Paragraph 212 of the NPPF states that great weight should be given to the conservation of heritage assets when considering the impact of a proposed development and the Council expects development proposals to avoid harm to the historic environment. Policy DMHB1 of the Local Plan Part 2 states that development that has an effect on heritage assets will only be supported: where it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF; where it makes a positive contribution to the local character and distinctiveness of the area; and where the proposal would relate appropriately in terms of design etc.

Policy DMHB 11 and DMHB 13 of the Local Plan Part 2 seek to protect features of positive value, including the safeguarding of heritage assets. Policy HE1 of the Hillingdon Local Plan Part 1 states that the Council will expect developments to conserve and enhance Hillingdon's distinct and variant environment, its setting and the wider historic landscape which includes archaeological significant areas. In accordance with paragraphs 214 and 215 of the NPPF, where a development proposal will lead to harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

The Rickmansworth Road frontage is defined by a continuous belt of mature trees and vegetation which forms a strong, verdant edge to the hospital and is identified by the Conservation Officer as a key positive contributor to the character and appearance of the Conservation Area and the setting of the historic hospital buildings.

The proposal would introduce two containerised generators of around 3m in height, with associated elements rising to approximately 7-10m, set within a 2.4m high palisade-fenced compound. It necessitates the removal of part of the existing tree group along the eastern boundary, thereby eroding a section of the green buffer between the developed hospital campus and Rickmansworth Road. The Conservation Officer has been consulted and raises concern that this represents further incremental encroachment of built form and utilitarian infrastructure into Green Belt and the Conservation Area, with a resulting degree of harm to: the verdant character of the conservation area edge; the setting of the locally listed building; and the wider green infrastructure. A further concern is expressed about the cumulative effect of a series of minor proposals at Harefield Hospital and a preference for a comprehensive masterplan approach to future development.

Officers recognise that the removal of part of the tree belt and the introduction of additional plant and fencing will result in some harm to the character and appearance of the Conservation Area and to the setting of the locally listed hospital building. However, it is considered that the compound is located within an existing service / plant corridor at the edge of the hospital, which is read in the context of substantial modern hospital buildings rather than the principal historic frontage. In addition, a significant proportion of the tree belt would be retained, such that views of the plant from Rickmansworth Road would be largely filtered and seasonal, with the compound remaining visually recessive in the streetscene. Moreover, there is no physical alteration to the fabric of the locally listed building, and the separation distance and intervening road mean that its immediate architectural presence and appreciation as part of the historic hospital complex are maintained.

Taking these matters together, the proposal is considered to give rise to a low level of less than substantial harm to the significance of the Harefield Village Conservation Area (through localised erosion of the verdant boundary and introduction of additional utilitarian development) and to the setting of the locally listed Children's Wing as a non-designated heritage asset. In line with the NPPF, this harm must be weighed against the public benefits of the scheme. In this case, the development provides essential associated infrastructure to secure a resilient emergency power supply for a regional specialist heart and lung hospital, directly supporting the continued safe operation of life-saving clinical services. Substantial weight is afforded to these public benefits and to the strong policy support for upgraded public service infrastructure, particularly in the health sector.

While the Conservation Officer recommends that an alternative site be considered and raises broader concerns about cumulative impacts in the absence of a hospital-wide masterplan, the technical and operational evidence submitted (and assessed above in the "Alternative Locations" section) demonstrates that realistic alternative siting options are severely constrained and that the chosen location represents the least harmful and most operationally workable option within the campus. The desirability of a future masterplan is acknowledged, but its absence does not, in itself, justify refusal.

On balance, it is considered that the scheme results in a low level of less than substantial harm to the Conservation Area and to the setting of the locally listed building. However, when this limited heritage harm (and the associated Green Belt and townscape effects) is weighed against the significant public benefits of providing critical emergency power infrastructure for the hospital, and subject to conditions securing appropriate materials, fencing treatment and landscaping, the public benefits are considered to clearly outweigh the identified harm. The proposal is therefore acceptable in heritage terms and complies with the relevant provisions of the NPPF, London Plan Policy HC1 and Hillingdon Local Plan heritage policies, when read as a whole.

## TREES AND LANDSCAPING

London Plan Policy G7, Policy DMHB 11, Policy DMHB 12, Policy DMHB 14 and Policy DMEI 10 of the Hillingdon Local Plan Part 2 seek to retain trees of value, protect them during construction, and secure appropriate mitigation where loss is unavoidable, including replacement planting or contributions towards off-site provision.

An Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement (AMS) have been submitted in support of the application. These identify one individual tree and two tree groups within the assessment area: a Category A European lime (T1), a Category B mixed group (G1) and a Category C mixed group (G2) along the eastern boundary adjacent to Rickmansworth Road. The

AIA notes that the majority of the tree cover is of low quality, but that T1 and G1 have higher retention value and, together with G2, contribute to screening the hospital from the adjacent road. The site is within the Harefield Village Conservation Area and the trees therefore also contribute to its wider character.

To accommodate the generator compound, the proposals require the partial removal of Group G2 within the footprint of the new plant. G2 is assessed as Category C (low quality / lower retention value), comprising juvenile to semi-mature mixed broadleaves, some of which are defective or short-lived and heavily affected by ivy. The higher value lime (T1) and the Category B group G1 are to be retained. Works within the root protection area (RPA) of T1 are limited to the removal of existing hardstanding and obsolete generator infrastructure, and the installation of new generator bases and service trenches at the periphery of the RPA. The AIA and AMS consider these impacts to be low, noting that the affected areas are already hard-surfaced and likely to contain relatively few structural roots. A minor crown lift to T1 (from 2m to 3m clearance) is required to facilitate fencing and access, which is not expected to materially affect its health or amenity value.

The AMS sets out detailed tree protection measures, including the establishment of a fenced Development Exclusion Zone around retained trees (notably T1 and G1), controls on demolition and hard-surface removal within RPAs, restrictions on compound and material storage locations, and arboricultural supervision of sensitive operations. Subject to these measures being secured by condition and adhered to on site, it is considered that the retained trees can be protected.

Given the constraints of the site, no specific on-site replacement tree planting is proposed. The partial loss of G2 will locally thin the vegetated edge along Rickmansworth Road and reduce its contribution to screening and to the verdant character of the Conservation Area and Green Belt boundary. This gives rise to a low level of harm to the site's visual amenity and landscape character, however in terms of ecology and biodiversity it is considered that any harm will be offset by the provision of Biodiversity Net Gain (BNG).

The low level of visual harm and impact on landscape character is weighed against the benefits of the scheme, namely that the proposal would provide essential infrastructure and would maintain resilient clinical operations, which are given substantial weight. Moreover, an adequate level of screening would be provided by the vegetation along the boundary with Rickmansworth Road. A condition is recommended to secure compliance with the AMS and Tree Protection Plan.

On balance, the proposal is considered acceptable in arboricultural and landscaping terms, in accordance with the above mentioned policies.

## ECOLOGY

Paragraph 187 of the NPPF requires planning decisions to minimise impacts on and provide net gains for biodiversity. London Plan Policy G6 and Policy EM7 of the Hillingdon Local Plan Part 1 seek to protect designated sites and biodiversity features from inappropriate development and to secure appropriate mitigation and enhancements.

A Preliminary Ecological Appraisal (PEA) has been submitted in support of the application, which identifies a range of statutory and non-statutory designated sites within 2 km of the hospital. The proposals relate to a small area (c.0.055 ha) of previously developed land and adjacent vegetation and will not result in direct land-take from, or functional impacts on, any designated site. The site comprises a narrow strip of lowland mixed deciduous woodland and scrub with an associated tree belt off-site along the eastern boundary, together with small areas of modified grassland and hardstanding. These habitats are of low to moderate ecological value at site level, however no

evidence of protected species was found on site.

The development would result in the loss of part of the woodland / scrub within the footprint of the new generator compound, with the remainder of the off-site tree belt and modified grassland retained. Subject to the inclusion of informative notes regarding precautionary measures for vegetation clearance and securing a Construction Environmental Management Plan (CEMP) by condition, the development is considered acceptable in ecological terms and to accord with the objectives of the NPPF, London Plan Policy G6 and Policy EM7 of the Hillingdon Local Plan. In terms of Biodiversity Net Gain, a minimum 10% net gain is to be delivered via off-site habitat provision secured through a Biodiversity Gain Plan (see below).

## BIODIVERSITY NET GAIN

Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Furthermore, Policy EM7 of the Hillingdon Local Plan Part 1 seeks to protect biodiversity features from inappropriate development and encourages the provision of biodiversity improvements from all developments. 10% biodiversity net gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990.

The application is supported by a Statutory Biodiversity Metric, Biodiversity Net Gain Assessment, BNG Solution Methodology and a letter from Biodiversity Units UK Ltd confirming that BNG units are available for purchase. The supporting information confirms that BNG would be secured via the purchase of off-site units, which would be secured by planning condition requiring submission and approval of a Biodiversity Gain Plan prior to commencement. Subject to the above condition, the proposal is considered capable of complying with paragraph 187 of the NPPF, London Plan Policy G6 and Policy EM7 of the Hillingdon Local Plan.

## AIR QUALITY

Policy SI1 of the London Plan and Policy DME1 14 of the Hillingdon Local Plan Part 2 seek to ensure that development is appropriately air quality neutral/positive, does not lead to unacceptable deterioration in local air quality or introduce new receptors into areas of poor air quality, and that particular regard is had to the health and amenity of sensitive uses.

An Air Quality Assessment (AQA) has been submitted in support of the application. The report confirms that the site is not located within an Air Quality Management Area (AQMA). The proposals involve two standby diesel generators that will only operate for periodic testing and during emergency power-outage events. The submitted AQA confirms that the impacts on air quality in the area would not be significant, would be in line with EPUK and IAQM guidance, and that no additional mitigation measures are required, provided the plant is installed, maintained and operated in line with the assumptions in the report. No new long-term sensitive receptors are introduced by the scheme and therefore a site-suitability assessment is not required.

Given the emergency / standby nature of the plant, the limited hours of operation, and the modelling results demonstrating negligible impacts at nearby residents and healthcare facilities, it is considered that the development would not give rise to unacceptable effects on local air quality or on residential and occupational amenity. The Council's Air Quality Officer has reviewed the proposal and confirmed no objection to the proposal given the location and purpose of the generator equipment, and that no further mitigation is required.

As such, it is considered there would be no significant impacts on air quality in the area, and the

proposal complies with Policy D14 of the London Plan and Policy DMEI 14 of the Hillingdon Local Plan Part 2.

## CONTAMINATED LAND

Policy DMEI 12 of the Hillingdon Local Plan Part 2 states that the Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

The Council's Contaminated Land Officer has reviewed the proposal and has no objection to the works, subject to the inclusion of an informative note relating to the discovery of unexpected land contamination.

As such, it is considered the proposal would be in accordance with Policy DME1 12 of the Hillingdon Local Plan Part 2.

## FLOOD RISK AND DRAINAGE

Policy SI12 and SI13 of the London Plan and Policy EM6 of the Hillingdon Local Plan Part 1, require development to be directed to areas of lowest flood risk, to ensure that it is safe for its lifetime and does not increase flood risk elsewhere, and to incorporate sustainable drainage systems wherever practicable.

The application site lies within Flood Zone 1 (lowest risk), is outside any Critical Drainage Area identified in the Borough's Surface Water Management Plan and has a low risk of surface water flooding. Nonetheless, a site-specific Flood Risk Assessment and Drainage Strategy has been submitted in support of the application.

Surface water run off would be managed via a network of porous gravel / infiltration trenches beneath and around the proposed equipment, designed to attenuate and infiltrate runoff onsite. It is considered that the proposed drainage measures are acceptable, the development will be safe for its lifetime and will not increase flood risk elsewhere, to accord with the above policies.

## CONCLUSION:

The proposed development would deliver essential infrastructure within an established hospital campus in the Green Belt. In line with paragraph 101 of the NPPF and London Plan Policy S2, significant weight is given to the need for, and benefits of, upgraded public service infrastructure of this nature.

The scheme would result in an increase in built plant and a new fenced compound at the edge of the campus, together with the partial loss of a low-value tree group, giving rise to a low level of harm to the openness of the Green Belt, the character and appearance of the Harefield Village Conservation Area and the site's landscape character. However, on balance it is considered that the limited and localised harm identified to Green Belt openness, heritage significance and landscape character is clearly outweighed by the substantial public benefits of providing critical emergency power infrastructure for Harefield Hospital. The development is considered to comply with the Development Plan when read as a whole and with the NPPF, and is therefore recommended for approval, subject to conditions.

## 8. Reference Documents

National Planning Policy Framework (2024)

The London Plan (2021)

Hillingdon Local Plan: Part 1 - Strategic Policies (2012)

Hillingdon Local Plan: Part 2 - Development Management Policies (2020)

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