

# Planning Statement

## Inland Limited

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

October 2019

## Prepared by

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Public

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## Quality Standards Control

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


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### Limitations

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## 1 INTRODUCTION

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

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

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

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

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



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

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

## Background

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

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

## Vision

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

## Structure of Statement

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

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

## 2 SUMMARY OF PLANNING BENEFITS

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

### Regeneration of Hillingdon Circus

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

### New Affordable Employment Opportunities

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

### Landscaping and Public Realm

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

## Transport Network and Public Transport Improvements

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

## Contributions

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

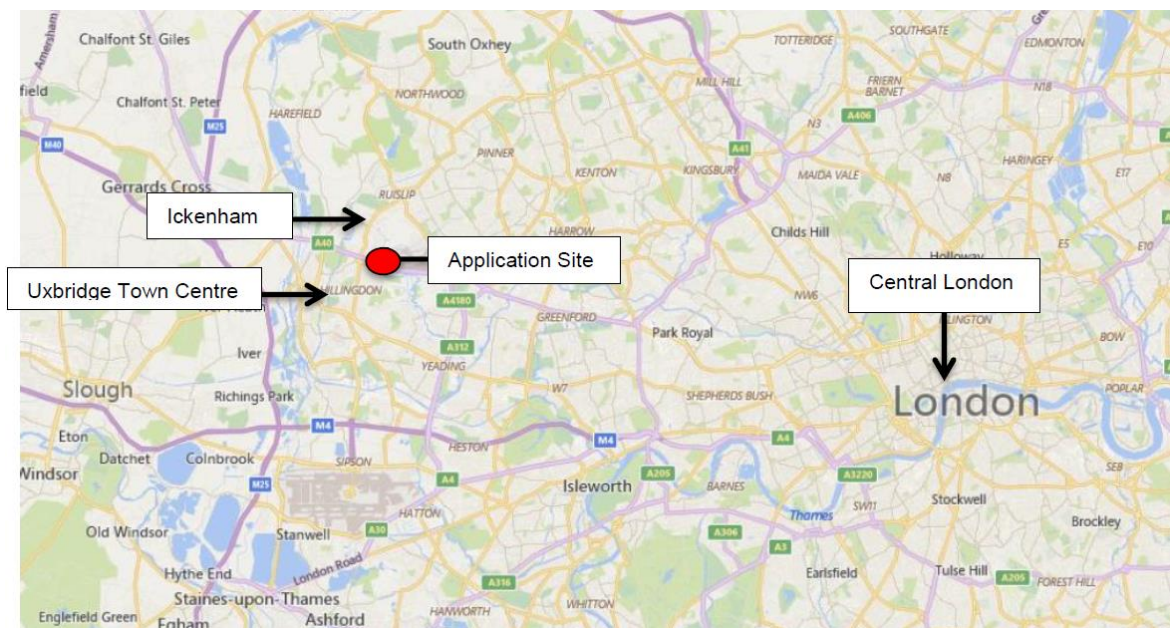
### 3 SITE AND SURROUNDING AREA

#### Overview

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

#### The Application Site

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



**Figure 1: Wider site location plan**

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

- 3.4 The site is largely self-contained, separated (visually and physically) by the surrounding highways network, most notably A40 Western Avenue and A437 Long Lane to the north and west respectively (but completely open on the eastern site boundary, which is designated Green Belt).
- 3.5 In its current form, the site comprises hard standing and semi-mature vegetation with large advertising boards located on the boundary adjacent to Long Lane. Semi-mature and mature boundary planting envelope the site on each of its boundaries. The site is broadly flat but inclines at its boundary adjacent to Long Lane (approximately 2.5 metres) and declines to the embankment adjacent to the A40 (approximately 3 metres).
- 3.6 Vehicular access to the site is provided via one existing access point from Freezeland Way, albeit this access point has been blocked with temporary concrete bollards and fencing. There is also an unused vehicle crossover on the south-west corner from Long Lane North.
- 3.7 The site is well-served by public transport, located approximately 200 metres east of Hillingdon London Underground Station, which provides access to Central London via the Metropolitan and Piccadilly lines. This station is adjacent to TfL bus routes and coach stops, which provide services to Ickenham, Uxbridge, and Oxford. In view of the site's proximity to public transport, it has a Public Transport Accessibility Level of 3 (PTAL).
- 3.8 The application site is allocated as a 'Local Centre' in the emerging Local Plan. The introduction of community facilities and an increase in population on the Site will provide local employment and stimulate local businesses in the area.
- 3.9 Inland Homes have also acquired a parcel of land on the site's eastern boundary that falls within the Green Belt. As detailed in the Design and Access Statement and Landscaping Proposals for the site, the development of Hillingdon Gardens will utilise the proximity of this land to the site's eastern boundary to provide integrated landscaping and connections to the wider area. The application site does not contain, nor is it within the setting of, any designated heritage assets.

### Surrounding Area

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

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



## 4 PLANNING HISTORY

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

### EIA Screening Opinion

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

### Application Site Planning History

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

- 4.2 Full planning application for “Construction of a residential-led, mixed use development comprising buildings between 4 and 9 storeys to provide 437 residential units (Use Class C3); employment floor space (Use Classes B1(a-c)); flexible commercial floor space (Use Classes A1/A3); associated car and cycle parking; and hard and soft landscaping, plant and other associated ancillary development”. **The application was refused on 21 March 2019.**
- 4.3 A request for an Environmental Impact Assessment Screening Opinion was made to the LPA on 25 July 2017 in relation to the residential-led redevelopment of the Site. **On 24 August 2017, the LPA confirmed that the development proposal will not require EIA.**

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

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

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

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

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

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

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

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

- 4.7 Two outline planning applications were submitted for the erection of a Tesco superstore (7,673 m<sup>2</sup>), 1,244m<sup>2</sup> of additional space for A1, A2, A3, A4 or D1 uses within the Use Classes Order, car parking for 409 cars, 205 residential apartments, including affordable housing, together with 205 car parking spaces, highway alterations and landscaping and the demolition of the Master Brewer Motel. **The application was refused on 14 June 2006.**
- 4.8 Duplicate application 4266/APP/2005/2979 was the subject of an appeal for non-determination. The Council subsequently resolved that if they had the power to do so the application would have been refused for the above-mentioned reasons. It should be noted that during the inquiry process the Council's reasons for refusing the application in respect of Green Belt and cumulative impact were removed. **The appeal was subsequently withdrawn January 2007.**

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

- 4.9 Outline Application submitted for the redevelopment of the site to provide a comprehensive mixed-use scheme comprising Use Class A1 food store (8,819m<sup>2</sup>), 4 retail units (805m<sup>2</sup>) and retail parking for 538 vehicles, plus 220 residential units including affordable housing and parking for 230 vehicles, highway alterations to Long Lane and Freezeland Way including new access to the site off Freezeland Way (involving demolition of the Master Brewer Motel). **The application was refused on 23 December 2004.**

**Table 1: Summary of Site Planning History**

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

### Other Relevant Planning History within the Surrounding Area

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

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

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

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

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

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

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

## 5 PRE-APPLICATION CONSULTATION AND SCHEME EVOLUTION

### Overview

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

### Determining Authority (Hillingdon Council)

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

### Defence Infrastructure Organisation (DIO)

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

### Greater London Authority (GLA)

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

#### Principle of development

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

### **Affordable Housing**

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

### **Housing**

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

### **Urban design**

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

### **Inclusive access**

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

### **Sustainable development**

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

## **Transport**

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

## **Transport for London (TfL)**

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

## **Site Access**

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

## **Car Parking**

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

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

#### **Cycle Parking**

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

#### **Trip Generation and Modal Split**

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

#### **Public Transport Impact**

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

#### **Highway Impact and Traffic Modelling**

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



### **Internal Highway Proposals**

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

### **Active Travel Zone (ATZ) Assessment**

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

### **Walking, Cycling, Healthy Streets and Vision Zero**

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

### **Construction**

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

### **Servicing**

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

### **Travel Plan**

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

### **Mayoral Community Infrastructure Levy (MCIL)**

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

## Stakeholder Approach

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

## Outcomes

### Design and Housing Mix

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

### Transport and Connectivity

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

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

## 6 PROPOSED DEVELOPMENT

### Overview

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

### Quantum of Development

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

**Table 2: Proposed Quantum of Residential Development**

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

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

## Masterplan Vision and Principles

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

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

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

#### **Building 1**

- 6.8 Building 1 is mixed- use and will include 368m<sup>2</sup> (GIA) of flexible commercial space (B1/A1/A3/D1) on the ground floor. The building is designed as a hinge block, fronting on to Long Lane as well as Freezeland Way. There is a commercial unit fronting on to Hillingdon Circus, providing an amenity gateway entrance into the site. There is a second commercial site that fronts Long Lane, providing an active street frontage to the site. At eight stories this building is proposed to be a landmark building, marking site within North Hillingdon Local Centre.
- 6.9 Building 1 provides 61 dwellings with residential units located on the first to seventh floors. The façade material will be primarily composed of brick with accented metal framing and reconstituted stone.

#### **Buildings 2, 3 and 4**

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

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

### **Buildings 5 to 9**

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

## Building 10

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

## Buildings 11 and 12

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

## Landscaping, Character Areas and Play Spaces

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



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

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

### Transport, Movement and Connectivity

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

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

### Energy and Sustainability

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

## 7 PLANNING POLICY

### Overview

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

### Material Planning Circumstances

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

### National Planning Policy

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

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

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

#### **National Planning Policy Guidance (NPPG)**

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

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

### Strategic Planning Policy

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

### Local Planning Policy

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

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

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

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

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

## 8 PLANNING CONSIDERATIONS

### Overview

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

### Principle of Development

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



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

### **Residential**

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

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

#### **Commercial Uses**

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

- 8.18 These uses are consistent with the LPP2 emerging site allocation (SA14) which states that the site should accommodate a residential led mixed-use site that contributes to the creation of a neighbourhood, provides a mix of uses and improves links to the area's main shopping centre, North Hillingdon. The Council will accept a "proportion of other uses that are appropriate to the site's location within the North Hillingdon Local Centre, including a hotel, restaurant and small-scale retail".

### **Summary**

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

### **Quality of Proposed Accommodation**

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

### **Affordable Housing**

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

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

### **Housing Mix**

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

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

- 8.31 Emerging LPP2 at Policy DMH 2: Housing Mix states that “the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council’s latest information on housing need”. The site will comply with Policy DMH2 and with guidance set out in the Site Allocation SA14: Master Brewer Site, which states that the site should provide a range of housing types and tenures.
- 8.32 The mix of housing proposed across the development offers homes that range from one-bedroom flats to three-bedroom homes, with an average housing make up of:
- 52% One-bedroom, two people;
  - 17% Two-bedroom, three people;
  - 16% Two-bedroom, four people; and
  - 16% Three-bedroom, five people.

#### **Density**

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

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

### **Accessible Housing**

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

### **Impact on Residential Amenity**

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

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

#### Design Amenity Provision and Landscaping

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

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

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



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

#### **Townscape and Visual Impact and Impact on the Green Belt Setting**

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

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

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

### Landscaping, Play Space and Amenity Provision

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

#### **Amenity Provision**

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

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

### **Landscaping**

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

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

### **Play Space**

- 8.75 Standards set out across the multi-level policy documents have guided the design of play spaces throughout the evolution of the development.
- 8.76 The current London Plan Policy 3.6 states that development proposals should make provision for play and informal recreation based on the expected child population of that scheme, including an assessment of future need. The Mayor's Shaping Neighbourhoods Play and Informal Recreation SPG for a minimum of 10 m<sup>2</sup> of play space per child.
- 8.77 Draft London Plan Policy S4 states that schemes that are likely to be used by children should increase the opportunity for play and informal recreation and incorporate good quality and accessible play provision for all ages, at least 10m<sup>2</sup> per child.
- 8.78 Hillingdon's LPP1 Policy EM5, Sport and Leisure states that development proposals should ensure that sufficient children's play space is provided for new residential development, in accordance with national and local guidelines.
- 8.79 Hillingdon's LPP2 Policy DMHB 19: Play Space seeks for new major residential developments to provide on-site play facilities. The policy states that any development that will result in the occupancy of ten or more children must provide children and young people's play facilities on-site. Further, a supporting statement within this document requires that larger housing developments provide at least 5m<sup>2</sup> of suitable formal play space on site, based on the child yield of the development as a whole. The Design and Access Statement provides full detail on the approach taken but it is understood that the proposal is policy compliant in this regard.

8.80 The development provides a hierarchy of formal and informal play spaces across the site. These spaces are thought to provide a range of options for children of different ages. Using the 'SPG play space requirement calculator' which allocates a GLA benchmark of 10m<sup>2</sup> of dedicated play space per child, a total of 2078m<sup>2</sup> play space is required. The development seeks to provide 2285m<sup>2</sup> of total play space area, including:

- 1157m<sup>2</sup> of dedicated formal and informal play area for children 0-5 years;
- 700m<sup>2</sup> of dedicated formal and informal play area for children 5-11 years; and
- 428m<sup>2</sup> of dedicated formal and informal play area for children 12 years and over.

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

### Transport and Parking

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

### Highways Impacts

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

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

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

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

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

### **Parking**

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

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

### **Cycle Infrastructure**

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



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

### **Service and Delivery**

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

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

## Environmental Considerations and Sustainability

### Biodiversity and Ecology

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

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

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

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

### **Archaeology**

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

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

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

#### **Aviation**

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

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

#### **Air Quality**

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

- 8.53 At the local level, Hillingdon LPP1 further supports that development should not cause deterioration in local air quality levels; should ensure the protection of both existing and new sensitive receptors; and should demonstrate air quality neutrality within the AQMA (Policy EM8). The requirement for development proposals is further stated in the more recent emerging Hillingdon LPP2 Policy DMEI14.
- 8.54 LPP2 Policy DMEI 14: Air Quality states that development proposals should as a minimum be air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors both existing and new, and actively contribute towards the improvement of air quality especially within the Air Quality Management Area.
- 8.55 The Air Quality Assessment addresses the concerns raised by the Local Authority with regard to elevated pollution levels and the potential impact of additional road vehicle exhaust emissions. The Assessment looks at both the construction and operational phases of the development. Potential changes to local air quality as a result of the development in relation to UK Air Quality Objectives (AQO) and EU Air Quality Standards. Also, where required, the Air Quality Assessment considers mitigation measures to reduce the effect of the proposed development upon local air quality.
- 8.56 There is the potential for air quality impacts as a result of fugitive dust emissions from the site during construction. Sensitive receptor locations were located up to 500m from the site access route, with a 50m buffer from the road network. There were no sensitive ecological receptors found within 50m of the site so further ecological assessment was not undertaken. Based on the Assessment, sensitivity to potential dust impacts on the receiving environment was high due to dust spoiling; however potential human health impacts were found to be low during earthworks and construction and medium for trackout processes. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction and track out activities was predicted to be negligible.
- 8.57 Sensitive receptor locations were identified though a desk-top study During the operational phase of the development. Annual mean NO<sub>2</sub> concentrations were predicted across the development. Modelling indicated that there were exceedances of the AQO throughout the modelling area, but this the exceedance was only at one of the residential (unit G) with 41.55ug/m<sup>3</sup>. The location may be the back wall of the unit, and as such, it is considered that annual mean NO<sub>2</sub> levels at the development site should not be viewed as a constraint to development. Additionally, it is not predicted that concentrations will exceed the 1-hour mean AQO for NO<sub>2</sub> across the development site in the 2021 opening year scenario.

- 8.58 The Air Quality Assessment states that the development is considered to be suitable without the implementation of mitigation measures to protect future users against elevated NO<sub>2</sub> concentrations.
- 8.59 Modelling of the predicted concentrations of particulate matter (PM<sub>10</sub>) across the development site found no exceedances of the AQO throughout the modelling area. As such, it is considered that annual mean PM<sub>10</sub> levels at the development site should not be viewed as a constraint to development.
- 8.60 Background levels of NO<sub>2</sub> and PM<sub>10</sub> are likely to be lower at elevated heights due to increased distance from emission sources, such as the local road network. Therefore, predicted concentrations at heights above ground floor level were considered to be acceptable in regard to pollutant exposure and were not assessed further.
- 8.61 PM<sub>2.5</sub> impacts were not considered further in the Assessment as PM<sub>10</sub> concentration levels were between 20-25ug/m<sup>3</sup> and are therefore unlikely to exceed PM<sub>2.5</sub>.
- 8.62 The Air Quality Assessment recommends a number of best practices to further mitigate against air quality impacts in the construction and operational phase of the development, including measure already taken into consideration in this application. Table 5.6 in the Assessment outlines measures to limit air quality impacts during the construction phase of the development. During the operational phase, these include the implementation of EV charging ports, a travel plan, car club and green infrastructure and landscaping.

#### **Noise**

- 8.63 The site's location close to Freezeland Way, Long Lane and the A40/Western Avenue means that the surrounding area is subject to a significant level of traffic movement. The site also lies within a reasonable proximity to RAF Northolt. Whilst noise levels are somewhat softened by the existing vegetation on the site's boundary, measures as set out below have been taken in consideration of Noise SPD guidance on noise sensitive development, to ensure that future residents are not exposed to inappropriate levels of noise and pollution and that residential amenity is protected.
- 8.64 A noise survey and acoustic assessment has been carried out to ascertain the noise impact on future residents. The report evaluates the impact of noise from site generated road traffic. The most significant noise affecting the site is road traffic noise from the A40 and A437 (Long Lane). To the north east of the site is RAF Northolt and to the west of the site is a railway line, but these affect the ambient noise levels to a lesser extent.



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

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

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

## **Sustainable Design**

- 8.78 National planning policy aims to support a low carbon future and to increase the use and supply of renewable and low carbon energy (Paragraph 148, NPPF). Draft London Plan SI2 Minimising Greenhouse Gas Emissions seeks to ensure that major new development will be net zero-carbon, though the reduction of greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the 'Be lean, be clean, be green' energy hierarchy.
- 8.79 At a local level Hillingdon Council aim to ensure that climate change mitigation is addressed at every stage of the development process by encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan (Policy EM1).
- 8.80 Government policies require significant energy reductions from buildings. The London Plan requires all major commercial developments to achieve a 35% carbon reduction beyond Part L 2013, and all residential developments to now be carbon neutral. Any cash in lieu required for compliance will be calculated assuming a carbon off-set price of £60 per tonne of carbon dioxide for a period of 30 years. An energy model of the development will inform the recommended sustainability features and calculate the CO<sub>2</sub> emissions reduction at the Hillingdon Gardens development from a base Part L 2013 compliant build. The passive design and energy efficiency measures to be incorporated within the design are features such as passive design, energy efficiency measures incorporating design features such as energy efficient lighting, occupancy and daylight sensing in relative areas, as well as the upgrading of 'U' values. The building will comply with Part L 2013 through energy efficiency and passive measures alone before the introduction of any renewable or low zero carbon technology.
- 8.81 It is anticipated that further measures will be considered that may be adopted as a means of reducing carbon emissions associated with the development; such measures include the use of construction materials that will be responsibly and legally sourced, as well as ensuring that all timber used is sourced in compliance with the UK Government's Timber Procurement Policy.
- 8.82 Local Plan Policy EM8 requires that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. It is anticipated that this will be achieved through the specification of water efficient sanitary fittings, such measures include dual flush toilets and low flow taps. This will help to further reduce the energy demand of the development as well as help to conserve water resources within the local area.
- 8.83 Flood maps sourced from the Environment Agency highlight that the majority of the development is located within Flood Zone 1 and is at low risk of flooding from fluvial sources.

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

### **Flood Risk and Drainage**

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

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

#### **Contamination**

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

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

#### **Daylight, Sunlight and Overshadowing**

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

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

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

## **9 COMMUNITY INFRASTRUCTURE LEVY & SECTION 106**

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



## 10 CONCLUSION

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

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

- 10.2 This application follows the submission of a full application submitted in 2017 (4266/APP/2017/3183) which was refused for the construction of a residential-led, mixed-use development comprising buildings between 4 and 9 storeys to provide 437 residential units; employment floorspace (Use Class B1(a-c)); and flexible commercial floor space.
- 10.3 The Master Brewer site has been vacant for over a decade, in which time it has been subject to further applications for development, including hybrid planning application in February 2014 for Full and Outline planning permission for a mixed-use development comprising the erection of a food store, measuring 3,543 m<sup>2</sup> (GIA) (Use Class A1); 3 retail units totalling 1,037 m<sup>2</sup> (GIA) (Use Class A1 to A5); a 70 bed hotel (Use Class C1); erection of 125 residential units (Use Class C3) and associated highways alterations together with landscape improvements (application reference numbers: 4266/APP/2014/518 and 519). The 2014 application was resolved to grant planning permission, subject to the completion of a Section 106 (s106) Agreement. Although consent was secured in principle, the application was subsequently marked as 'No Further Action' by the Local Planning Authority as no s106 agreement was completed.
- 10.4 The Applicant's vision to bring forward a residential-led mixed-use scheme in this location is supported in principle by both the LPA and the GLA and is aligned with the site allocation SA14 site B in the emerging Local Plan LPP2. Developing a high-quality, design-led residential community that is integrated with the surrounding natural landscape aligns closely with the Council's emerging aspirations to see sustainable housing growth within the strategic site allocations across the borough. Given the site's location within North Hillingdon Local Centre; relative separation from the surrounding built environment; and its proximity to local amenities, services and public transport, a higher density proposal is supported and promoted. The level of residential development proposed (514 units) will represent a significant and valuable contribution to local housing supply.
- 10.5 Through consultation with stakeholders such as Hillingdon Council, the GLA, TfL, the DIO and local community groups the design of the development proposal has evolved to align with relevant policy

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

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

## **Appendices**

**APPENDIX A:** Proposed Site Plan

**APPENDIX B:** Drawing Schedules

**APPENDIX C-1:** GLA pre-app comments

**APPENDIX C-2:** TfL pre-app comments

**APPENDIX C-3:** Hillingdon Council pre-app comments



## Hillingdon Gardens - Former Master Brewer Motel Site, Freezeland Way, UP10 9PQ

A detailed planning application was submitted on behalf of Inland Limited in October 2019 in relation to the above-mentioned site. The application seeks planning permission for the following proposed development, known as Hillingdon Gardens:

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

The proposal has sought to deliver a masterplanned, residential-led, mixed-use scheme that will positively regenerate this long-term vacant site to deliver substantial public benefits, as presented in the submitted application documents and acknowledged in the officer's report to the committee on 19 February 2020.

This detailed planning application is the outcome of over 12 months intensive work by the design team in collaboration with officers and other stakeholders.

The scheme emerged from a landscape-led masterplanning process which informed layout, scale, massing, orientation, connections, permeability and movement through the site.

The design responds to the constraints of the site by seeking to connect these spaces effectively via green infrastructure provision and sustainable movement through better established connections.

The adopted Site Allocation, identifies this brownfield site as a strategic site allocation and sets the context for the residential-led, mixed-use regeneration of the site for both housing and appropriate uses to support the local centre.

### Summary of Scheme Benefits

The proposal will deliver a series of significant benefits which are summarised to include:

- ◆ Sustainable regeneration of a 2.48ha vacant brownfield allocated site, which currently makes no contribution to the North Hillingdon local Centre.
- ◆ Delivery of the Council's aspirations for the site in line with the adopted site allocation, through the provision of high-quality place-making and design; and integration of the site within the existing local centre that will assist in reinstating the 'Circus'.
- ◆ Creation of a new, secure and inclusive residential neighbourhood through the delivery of new residential units comprising an appropriate mix of dwelling types that would provide much needed new homes in this part of the borough.
- ◆ Delivery of 182 genuinely affordable new homes (achieving 35% compliant delivery on a unit and habitable room basis), which will make a valuable contribution to the boroughs affordable housing requirement. The affordable housing will be provided as 70% social (London Affordable Rent) and 30% intermediate (Shared Ownership) on a habitable room basis, which fully accords with planning policy across all levels.

- ◆ Provision of a mix of flexible commercial uses (Use Classes B1/A1/A3/D1) that will promote and enhance the vitality and viability of the Local Centre, alongside facilities to support Met Policing Dedicated Ward Officer requirements.
- ◆ Long-term employment opportunities created by the provision of on-site commercial space and potential for new jobs and spin off economic activity including construction jobs and supply chain linkages.
- ◆ Delivery of significant landscaping improvements that will enhance the site and surrounding area, generating environmental improvements whilst also improving connections and pedestrian experience to and from the site. The scheme would also provide a financial contribution of £539,000 towards landscape screening and ecological mitigation secured by a S106 agreement.
- ◆ Delivery of a scheme that provides a positive 26% net-gain in biodiversity in excess of the Gov't target of 10% and an urban greening factor of 0.4. This significant provision has been achieved in consultation with the London Wildlife Trust and through a nature recovery network.
- ◆ A hierarchy of high-quality formal and informal play spaces for children of all ages which exceeds the GLA's child play space requirements.
- ◆ The delivery of a significant quantum of high quality public open space, which will be of benefit to existing and new residents.
- ◆ Emphasis on the delivery of Healthy Streets principles alongside a reduced level of car parking provision (0.3 ratio) to reflect the site's sustainable location adjacent to a public transport hub and to respond to the climate crisis. The proposal seeks to amend resident approaches to travel towards more sustainable methods of movement, which are less car focused.
- ◆ A series of transport-related improvements including:
  - Entering into a S278 and/or S38 agreement to address any and all on-site and off-site highway works including:
    - Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities;
    - Improved pedestrian and cycling facilities throughout the signalled junction and potential improvements to the service road approach in Freezeland Way;
    - Creation of a new public realm 'Gateway' on Freezeland Way;
    - Enhanced bus stop provisions for the 'Oxford Tube' bus service;
    - Monitoring of signal optimisation at Hillingdon Circus;
    - Contingency monies to remedy any parking displacement onto the public highway (£20,000);
    - Review of local public lighting, road signage and marking provisions;
    - Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable; and
    - Implementation of vehicle actuated speed signs (up to a cost of £5,000).
  - Parking permit free development for all future residents.
  - A financial contribution of £1.365m (£455,000 per annum over 3 years) towards bus improvements.
  - Up to 4 car club membership bays, with one bay provided upon initial occupation and three years annual membership per household upon first occupation.

- Travel Plan initiatives/incentives with a financial performance bond (£20,000), including:
  - On-site cycle hub repair and maintenance facilities and Brompton / traditional cycle hire;
  - Continuous access and operation of the cycle 'hub';
  - Complementary oyster cards with £40 credit per household upon first occupation; and
  - 20% electric vehicle charging provision with active facilities, with the remainder all featuring passive provision.
- ◆ Delivery of significant financial contributions secured by a S106 Agreement including:
  - A financial contribution of £586,422 towards carbon offset fund secured by a S106 Agreement.
  - A financial contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement secured by a S106 Agreement.
  - A financial contribution of £35,000 to enable the Council to extend the watercourse from the site to Freezeland Covert as part of improvements to the Green Belt land to the east of the development.
  - Either a construction training scheme delivered during the construction phase of the development or a financial contribution secured in line with London Borough of Hillingdon guidance.

In summary, the proposed development comprises a high-quality, residential-led mixed-use scheme that on balance, aligns with London Plan and Local Plan policy objectives. The scheme would deliver clear and significant planning benefits; in particular a valuable contribution to local housing supply including substantial quantum of genuinely affordable housing.

February 2020

## Hillingdon Gardens Off-site Landscape Proposals:

## Cost estimate

Revised estimate based on Grontmij plan ref.W105860L07 Rev A (dated 2012) with additional items to reflect the current circumstances.

The Hillingdon Gardens application will result in a significant uplift in the local residential population with an influx of families on an island site (surrounded by busy roads and the railway) where accessible public open space is in short supply.

This estimate allows for an amended landscape layout which will need to be prepared to reflect the current development proposals. Specific changes related to the current development include:

- new footpath links are required between the developed site, the public open space and Freezeland Covert,
- the provision of play / sports facilities (outdoor gym) is required to provide opportunities for formal and informal recreation
- the landscape layout will need to incorporate scrapes, swales and ponds designed to contribute towards the current SUDS / drainage strategy,
- specimen tree and woodland planting is required to mitigate the loss of extensive tree cover on the development site, required to facilitate the development.

Item	Unit	Qty	£/Cost	Sub-total
To install a children's play area				100,000
To install other recreational facilities				100,000
To lay Coxwell gravel footpaths, 1.4 metres wide	metre	1,000	115	115,000
To install SUDS features (scrapes, swales and ponds)*				65,000
To plant trees @14-16cm girth + 3 years maintenance	each	100	400	40,000
To plant and maintain woodland (whips / transplants)	m2	5,000	10	50,000
To install boundary fencing /security (part of site)	metre	350	40	14,000
To provide waymarking /signage (3 locations)				<u>6,000</u>
 SUB-TOTAL				 £490,000
To design scheme and manage contract**				<u>£49,000</u>
 <b>TOTAL:</b>				 <b>£539.000</b>

### Notes:













\*The cost of the SUDS features includes earthworks, swales ponds in addition to the £35K negotiated with the drainage team.

\*\* A new masterplan will be required with design details, contract documents and project management. Fees at 10% of project cost assumed.

RR (February 2020)

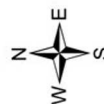


## Highways Browser

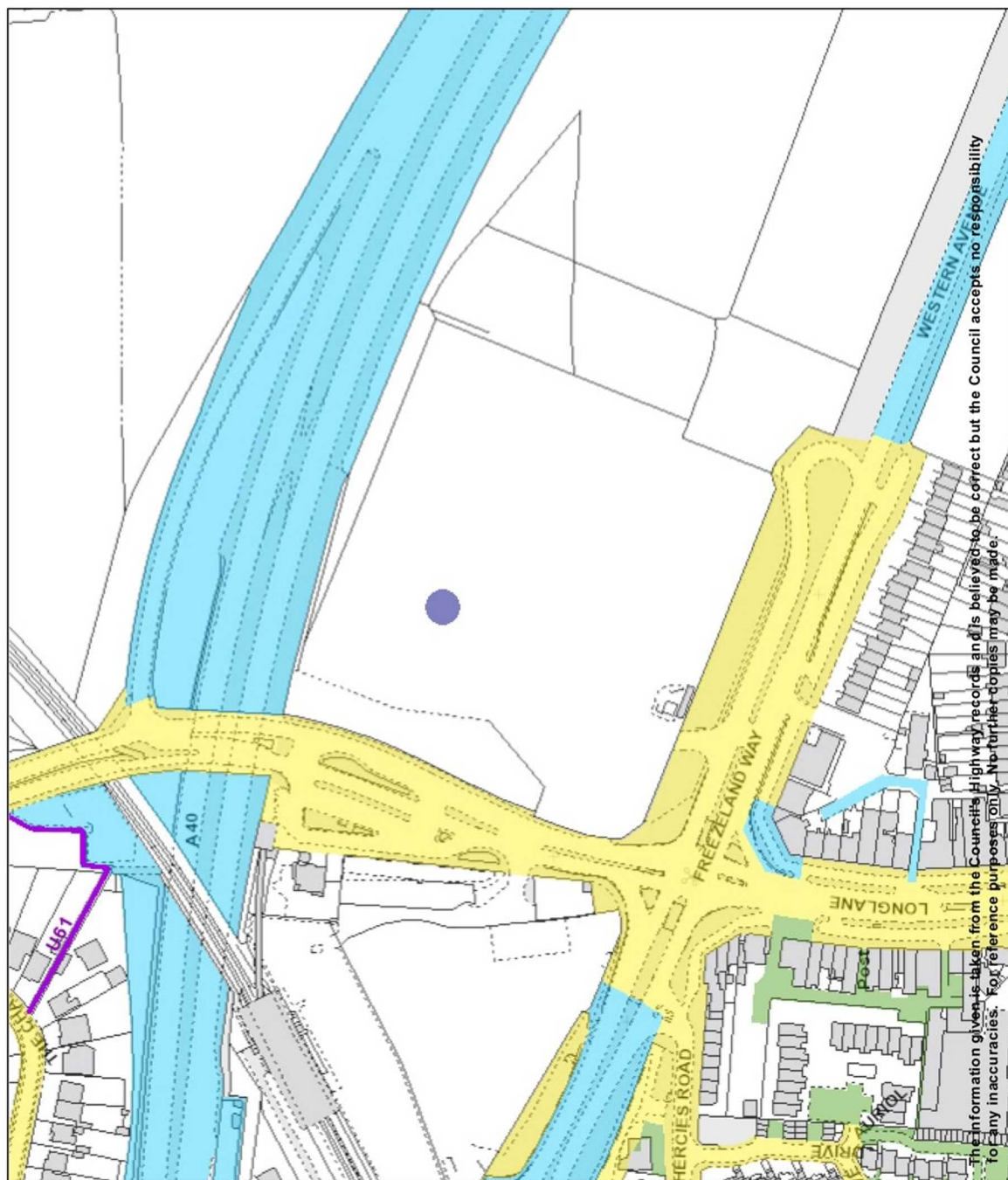
-  Bridleway
-  Byway Open To All Traffic
-  Footpath
-  Road Widening Line (Indicative only)
-  Adopted Highway
-  Housing Department Maintained
-  Housing but right of way (not public)
-  Privately maintained
-  Section 38 or 228 -subject to adoption
-  Other - see map notes
-  Heathrow Airport
-  Borough Boundary



**HILLINGDON**  
LONDON



## Map Notes



The information given is taken from the Council's Highway records and is believed to be correct but the Council accepts no responsibility for any inaccuracies. For reference purposes only. No further copies may be made.

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# Hillingdon Gardens Document Schedule – 03.08.2020

Original Submission (reflective of Committee Report and updated to regularise errors)		Revised Submission (for those cells left blank, the Original Submission documents remain current)	
Drawing / Document Title	Drawing no.	Drawing / Document Title	Drawing no.
<b>Collado Collins</b>			
Location Plan	E0-001_RevP4 (Not listed on committee report)		
Existing Site Plan	E0-100_RevP3		
Proposed Site Plan	P0-001_RevP4 ( <b>Committee report states 001_Rev P3 instead of P4</b> )		P0-001_RevP7
Ground Floor Plan	P0-100_RevP3		P0-100_RevP6
First Floor Plan	P0-101_RevP3		P0-101_RevP6
Second Floor Plan	P0-102_RevP3		P0-102_RevP5
Third Floor Plan	P0-103_RevP3		P0-103_RevP5
Fourth Floor Plan	P0-104_RevP3		P0-104_RevP5
Fifth Floor Plan	P0-105_RevP3		P0-105_RevP5
Sixth Floor Plan	P0-106_RevP3		P0-106_RevP5
Seventh Floor Plan	P0-107_RevP3		P0-107_RevP5
Eighth Floor Plan	P0-108_RevP3		P0-108_RevP5
Ninth Floor Plan	P0-109_RevP3		P0-109_RevP5
Tenth Floor Plan	P0-110_RevP3		P0-110_RevP5
Roof Plan	P0-111_RevP3		P0-111_RevP5
Site Sections Sheet 1	P0-200-RevP3		P0-200-RevP5
Site Sections Sheet 2	P0-201-RevP3		P0-201-RevP4
Site Elevations Sheet 1	P0-300-RevP3		P0-300-RevP4
Site Elevations Sheet 2	P0-301-RevP3		P0-301-RevP5
Site Elevations Sheet 3	P0-302-RevP3		P0-302-RevP4
Site Elevations Sheet 4	P0-303-RevP3		P0-303-RevP4
Building 1 Floor Plans	P1(01)-100_RevP3		P1(01)-100_RevP6
Building 2 Floor Plans	P1(02)-100_RevP3		P1(02)-100_RevP6
Building 3 Floor Plans	P1(03)-100_RevP3		P1(03)-100_RevP5
Building 4 Floor Plans	P1(04)-100_RevP3		P1(04)-100_RevP6
Building 5 Floor Plans	P1(05)-100_RevP3		P1(05)-100_RevP6
Building 6 Floor Plans	P1(06)-100_RevP3		P1(06)-100_RevP5
Building 7 Floor Plans	P1(07)-100_RevP3		P1(07)-100_RevP5
Building 8 Floor Plans	P1(08)-100_RevP3		P1(08)-100_RevP5
Building 9 Floor Plans	P1(09)-100_RevP3		P1(09)-100_RevP5
Building 10 Floor Plans	P1(10)-100_RevP3		P1(10)-100_RevP6
Building 11 Floor Plans	P1(11)-100_RevP3		P1(11)-100_RevP5
Building 12 Floor Plans	P1(12)-100_RevP3		P1(12)-100_RevP6
Building 1 Elevations	P3(01)-100_RevP3		P3(01)-100_RevP4
Buildings 2, 3 Elevations	P3(02-03)-100_RevP3		P3(02-03)-100_RevP4
Building 4 Elevations	P3(04)-100_RevP3		P3(04)-100_RevP5
Building 5 Elevations	P3(05)-100_RevP3		P3(05)-100_RevP4
Building 6 Elevations	P3(06)-100_RevP3		P3(06)-100_RevP4
Building 7 Elevations	P3(07)-100_RevP3		P3(07)-100_RevP4
Building 8 Elevations	P3(08)-100_RevP3		P3(08)-100_RevP4
Building 9 Elevations	P3(09)-100_RevP3		P3(09)-100_RevP4
Building 10 Elevations	P3(10)-100_RevP3		P3(10)-100_RevP4
Building 11 Elevations	P3(11)-100_RevP3		P3(11)-100_RevP4
Building 12 Elevations	P3(12)-100_RevP3		P3(12)-100_RevP4
Area Schedule	2019-09-24 RevP3 (Not listed on committee report)		2020-04-23 RevP4
Dwelling Schedule	2019-12-12 RevP5 (Not listed on committee report)		2020-04-15 RevP6
Ground Floor Plan - Access	P0-700 Rev P1		P0-700 Rev P3
First Floor Plan - Access	P0-701 Rev P1		P0-701 Rev P3

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Second Floor Plan - Access	P0-702 Rev P1		P0-702 Rev P3
Third Floor Plan - Access	P0-703 Rev P1		P0-703 Rev P2
Fourth Floor Plan - Access	P0-704 Rev P1		P0-704 Rev P2
Fifth Floor Plan - Access	P0-705 Rev P1		P0-705 Rev P2
Sixth Floor Plan - Access	P0-706 Rev P1		P0-706 Rev P2
Seventh Floor Plan - Access	P0-707 Rev P1		P0-707 Rev P2
Eighth Floor Plan - Access	P0-708 Rev P1		P0-708 Rev P2
Ninth Floor Plan - Access	P0-709 Rev P1		P0-709 Rev P2
Tenth Floor Plan - Access	P0-710 Rev P1		P0-710 Rev P2
Dwelling Types 1B2P Sheet9_w	P4-109 Rev P1	Dwelling Type 1B2P-08	P4-1208 Rev P1
Dwelling Types 2B3P Sheet 5_w	P4-115 Rev P2	Dwelling Type 2B3P-04	P4-2304 Rev P1
		Dwelling Type 2B3P-07	P1-2307 Rev P1
Dwelling Types 3B6P Sheet 5_w	P4-152 Rev P1	Dwelling Type 3B6P-02	P4-3602 Rev P1
Ground Floor Bulky Waste Plan	P0-100 Rev P3		P0-100 Rev P6
Ground Floor Plan - Tenure	P0-400 Rev P1		P0-400 Rev P3
First Floor Plan - Tenure	P0-401 Rev P1		P0-401 Rev P3
Second Floor Plan - Tenure	P0-402 Rev P1		P0-402 Rev P3
Third Floor Plan - Tenure	P0-403 Rev P1		P0-403 Rev P2
Fourth Floor Plan - Tenure	P0-404 Rev P1		P0-404 Rev P2
Fifth Floor Plan - Tenure	P0-405 Rev P1		P0-405 Rev P2
Sixth Floor Plan - Tenure	P0-406 Rev P1		P0-406 Rev P2
Seventh Floor Plan - Tenure	P0-407 Rev P1		P0-407 Rev P2
Eighth Floor Plan - Tenure	P0-408 Rev P1		P0-408 Rev P2
Ninth Floor Plan - Tenure	P0-409 Rev P1		P0-409 Rev P2
Tenth Floor Plan - Tenure	P0-410 Rev P1		P0-410 Rev P2
<b>BMD</b>			
Landscape Masterplan	BMD.19020.DR.P001 Rev A		No longer used
Landscape Masterplan (Coloured)	BMD.19020.DR.P100 Rev A		No longer used
Overall General Arrangement	BMD.19020.DR.P100 Rev A		BMD.19020.DR.P100 Rev C
Overall General Arrangement General Arrangement 1 of 4	BMD.19020.DR.P101 Rev A		BMD.19020.DR.P101 Rev C
General Arrangement 2 of 4	BMD.19020.DR.P102 Rev A		BMD.19020.DR.P102 Rev C
General Arrangement 3 of 4	BMD.19020.DR.P103 Rev A		BMD.19020.DR.P103 Rev C
General Arrangement 4 of 4	BMD.19020.DR.P104 Rev A		BMD.19020.DR.P104 Rev C
Podium Gardens General Arrangement	BMD.19020.DR.P105 Rev A		BMD.19020.DR.P105 Rev B
Roof Gardens General Arrangement 1 of 4	BMD.19020.DR.P106 Rev A		BMD.19020.DR.P106 Rev B
Roof Gardens General Arrangement 2 of 4	BMD.19020.DR.P107 Rev A		BMD.19020.DR.P107 Rev B

## Hillingdon Gardens Document Schedule – 03.08.2020

Roof Gardens General Arrangement 3 of 4	BMD.19020.DR.P108 Rev A (Committee report states P108 Rev 3 instead of Rev A)		BMD.19020.DR.P108 Rev B
Roof Gardens General Arrangement 4 of 4	BMD.19020.DR.P109 Rev A		BMD.19020.DR.P109 Rev B
Planting Plan 1 of 4	BMD.19.020.DR.P301 Rev B		BMD.19.020.DR.P301 Rev D
Planting Plan 2 of 4	BMD.19020.DR.P302 Rev A		BMD.19020.DR.P302 Rev C
Planting Plan 3 of 4	BMD.19.020.DR.P303 Rev B		BMD.19.020.DR.P303 Rev D
Planting Plan 4 of 4	BMD.19020.DR.P304 Rev A		BMD.19020.DR.P304 Rev C
Podium Gardens Planting Plan	BMD.19020.DR.P305 Rev A		BMD.19020.DR.P305 Rev B
Roof Gardens Planting Plan 1 of 4	BMD.19020.DR.P306 Rev A		BMD.19020.DR.P306 Rev B
Roof Gardens Planting Plan 2 of 4	BMD.19020.DR.P307 Rev A		BMD.19020.DR.P307 Rev B
Roof Gardens Planting Plan 3 of 4	BMD.19020.DR.P308 Rev A		BMD.19020.DR.P308 Rev B
Roof Gardens Planting Plan 4 of 4	BMD.19020.DR.P309 Rev A		BMD.19020.DR.P309 Rev B
Site Wide Sections	BMD.19020.DR.P401 Rev A		
Green Belt Land	BMD.19.020.DR.SK003		
Arboricultural Implications Plan	BMD.19.020.DRG.P902 Rev A (Committee report states 903 instead of 902)		
Tree Constraints Plan	BMD.19.020.DRG.P901 Rev A		
Ecology Phase 1 Habitat Report	BMD.19.020.RPE/P1.801.RevA-.Ecology, September 2019		
Townscape and Visual Impact Assessment*	BMD.19.020.RP.001, October 2019		
Townscape and Visual Impact Assessment Addendum*	BMD.19.020.RP.006.A, December 2019		
		ZTV – 2020 Parameters Bare Earth*	BMD.19.020.TVIA.FIG.0003 Rev C
		ZTV – 2020 Parameters Visual Barriers*	BMD.19.020.TVIA.FIG.004
		Hillingdon Gardens Verified Views*	V3D 170401 July 2020
<b>*These documents should be read together. The revised submission documents provide an update to respond to design changes made in July 2020.</b>			
Bird Hazard Management Plan	BMD.19.020.RPE/TN.803.BHMP, September 2019		
Reptile Report	BMD.19.020.RPE/P2.804-Reptile, October 2019		
<b>GL Hearn</b>			
Planning Statement	October 2019		
<b>JTP / Collado Collins</b>			
Design and Access Statement	October 2019		
<b>WSP</b>			
Transport Assessment including Residential Travel Plan and Delivery;	Rev 2, October 2019	Transport Assessment including Residential Travel Plan and Delivery;	Rev 3, July 2020

## Hillingdon Gardens Document Schedule – 03.08.2020

Servicing Plan; and Car Park Management Plan		Servicing Plan; and Car Park Management Plan	
Transport Addendum Note - 2019 Traffic Surveys	November 2019		
Proposed Highway Improvements Plan	70057679-TP-SK-17 Rev C		70057679-TP-SK-17 Rev D
Proposed Parking Arrangements with Disabled Parking for 10% of Residential Dwellings	70057679-TP-SK-18 Rev A		70057679-TP-SK-18 Rev B
<b>Terrapin</b>			
Statement of Community Involvement	2nd October 2019		
<b>Create Consulting</b>			
Air Quality Assessment	MR/JEB/P19/1773/01 Revision A, September 2019		Superseded by new assessment
Air Quality Assessment	MR/JEB/P19/1773/02 Revision B, October 2019 (Not listed on committee report)		Superseded by new assessment
		Air Quality Assessment (New)	ref. MR/CS/P19-1773/02 Rev A, April 2020
		Air Quality Technical Note – Air Quality Neutral Assessment	BD/P19-1773/01TN, June 2020
<b>Spectrum</b>			
Acoustic Assessment	NDT5824/17025/Rev8, 3 <sup>rd</sup> October 2019		NDT5882/17025/Rev 9, 22 <sup>nd</sup> January 2020
<b>ICIS Design</b>			
Surface Water Management Report	Rev D, September 2019		
Flood Risk Assessment	Rev C, September 2019		
<b>Delta Simons</b>			
Preliminary Geo-Environmental Risk Assessment	17-00420.02, October 2019		
<b>AOC</b>			
Archaeology Assessment	23887, September 2019		
<b>Cudd Bentley</b>			
Energy Statement	JR/5550/17, Ver 01/10/19		
Sustainability Statement	JR/5550/17, Ver 01/10/19		
Ventilation Strategy	5550/3/SP, June 2019		
		GLA Carbon Emission Reporting Spreadsheet	5550-GLA Carbon Emission Reporting Spreadsheet_v1.1
		Hillingdon Gardens Overheating Study in Compliance with CIBSE Guidance TM59	January 2020

## Hillingdon Gardens Document Schedule – 03.08.2020

		Hillingdon Overheating Assessment in compliance with CIBSE Guidance TM59	February 2020
		Overheating Checklist	Cudd Bentley
		Air Source Heat Pump Product Information	
		Building 01 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50003 Rev P01
		Building 02 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50004 Rev P01
		Building 03 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50005 Rev P01
		Building 04 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50006 Rev P01
		Building 05 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50007 Rev P01
		Building 06 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50008 Rev P01
		Building 07 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50009 Rev P01
		Building 08 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50010 Rev P01
		Building 09 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50011 Rev P01
		Building 10 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50012 Rev P01
		Building 11 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50013 Rev P01
		Building 12 Riser / Roof Services Layout	5550-CBC-01-XX-DR-SK-50014 Rev P01
		Heat Distribution Services Layout	5550-CBC-XX-XX-DR-M-50001 Rev P01
		Possible Air Source Heat Pump Locations with Storage	5550-CBC-XX-XX-DR-M-50003 Rev P01
		Typical Heating Schematic	5550-CBC-XX-XX-DR-M-50006 Rev P01
<b>Robinsons Surveyors</b>			
Daylight / Sunlight Assessment	3 <sup>rd</sup> October 2019		Superseded by new assessment
Average Daylight Analysis	30 <sup>th</sup> September 2019 (Not listed on committee report)		Superseded by new assessment
Daylight Sunlight Assessment Letter	24 <sup>th</sup> January 2020 (Not listed on committee report)		Superseded by new assessment
Daylight Sunlight Assessment	13 <sup>th</sup> February 2020 (Not listed on committee report)		Superseded by new assessment
		Internal Daylight and Sunlight Report (New)	29 <sup>th</sup> May 2020
<b>MK Surveys</b>			
Topographical Survey	July 2019		
<b>Omega Fire (BB7)</b>			
Fire Strategy	OF-OFS-3671-01-A, Rev A, 13 <sup>th</sup> September 2019		OF-OFS-3671-01-E, Rev E, 22 <sup>nd</sup> April 2020
Proposed Disabled Refuge Locations Drawing Pack	BB-DRC-3671-02, 10 <sup>th</sup> January 2020		
<b>London Wildlife Trust</b>			

## Hillingdon Gardens Document Schedule – 03.08.2020

Biodiversity Net Gain and Urban Greening Factor Calculations	October 2019		
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## Hillingdon Gardens – Draft Conditions Schedule

10 July 2020

This condition schedule has been prepared to assist the GLA with the drafting of planning conditions in relation to application ref. GLA/0995g/02 (GLA reference) / ref. 4266/APP/2019/3088 (LPA reference). The draft condition wording set out in this schedule is not the proposed or agreed condition wording but is for the GLA to add to / amend as appropriate, whilst aligning with London Borough of Hillingdon standard condition wording and requirements.

No.	Topic	Comments	Proposed Condition Wording
1	Time Limit	Standard condition	<p><b>Standard LBH condition wording:</b></p> <p><i>The development hereby permitted shall be begun before the expiration of three years from the date of this permission.</i></p> <p><i>Reason: To comply with Section 91 of the Town and Country Planning Act 1990.</i></p>
2	Accordance with Approved Plans [& Documents?]	<p>Standard condition.</p> <p>[Should this also include approved documents?]</p>	<p><b>Standard LBH condition wording:</b></p> <p><i>The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers [and documents]:</i>  <i>[INSERT APPROVED DRAWING REFS &amp; DOC REFS HERE]</i></p> <p><i>REASON To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).</i></p>
3	Materials	Not stated as required in the committee report but assume this is a standard requirement for major schemes.	<p><b>Example LBH condition wording:</b></p> <p><i>Detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority before the</i></p>



		<p>Standard LBH materials condition wording taken from another recent major application.</p> <p>Condition trigger added in relation to submission of window and door details as was not stated in example condition wording. See addition in blue.</p>	<p>relevant part of the works is begun, and the works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:</p> <p>(a) Samples of materials</p> <p>(b) Details of roof parapets, window and door reveals, spandrel panels</p> <p>(c) Details of balconies, railings, metal cladding,</p> <p>(d) Details of signage and external lighting</p> <p>Sample panels required</p> <p>Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel (s) so approved.</p> <p>Windows and doors</p> <p>Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority <i>before the relevant parts of the approved works are commenced</i>. The works shall be undertaken in accordance with the approved details.</p> <p>Reason: To ensure that the development presents a satisfactory appearance in accordance with Policy HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies DMHB 1, DMHB 4 and DMHB 11 of the Hillingdon Local Plan Part 2 (2020).</p>
4	Landscape Scheme	Condition RES10 - recommended condition wording set out in committee report.	<p><b>Recommended standard LBH Landscape Scheme (RES10) condition wording:</b></p> <p>No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:</p>

		<p>Following review we request that this condition wording is amended to be triggered by commencement of above ground level works to provide greater flexibility. This is due to the potential for the items listed requiring further input / design by third parties prior to submission which requires greater lead in times. Proposed alternative trigger wording shown in blue.</p> <p>Amendments to the recommended condition wording are proposed in blue / strikethrough including:</p> <ul style="list-style-type: none"> <li>- Amends to wording of 2.d in relation to electric vehicle charging points to remove incorrect reference to 5% provision.</li> <li>- Removal of reference to living walls and roofs as none are proposed and the justification as to why no part of the development can include them has already been discussed and agreed.</li> </ul>	<p>1. Details of Soft Landscaping</p> <p>1.a Planting plans (at not less than a scale of 1:100),</p> <p>1.b Written specification of planting and cultivation works to be undertaken,</p> <p>1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate</p> <p>2. Details of Hard Landscaping</p> <p>2.a Refuse Storage</p> <p>2.b Cycle Storage</p> <p>2.c Means of enclosure/boundary treatments</p> <p>2.d Car Parking Layouts (including <i>identification of demonstration that 5% of all parking spaces are served by electrical charging points</i>)</p> <p>2.e Hard Surfacing Materials</p> <p>2.f External Lighting</p> <p>2.g Other structures (such as play equipment and furniture)</p> <p><del>3. Living Walls and Roofs</del></p> <p><del>3.a Details of the inclusion of living walls and roofs</del></p> <p><del>3.b Justification as to why no part of the development can include living walls and roofs</del></p> <p>4. Details of Landscape Maintenance</p> <p>4.a Landscape Maintenance Schedule for a minimum period of 5 years.</p> <p>4.b Proposals for the replacement of any tree, shrub, or area of surfacing/seedling within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.</p> <p>5. Schedule for Implementation</p> <p>6. Other</p> <p>6.a Existing and proposed functional services above and below ground</p>
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			<p>6.b Proposed finishing levels or contours</p> <p>Thereafter the development shall be carried out and maintained in full accordance with the approved details.</p>
5	Tree Protection	<p>Condition RES8 – recommended condition wording set out in committee report.</p> <p>[Reviewed against conditions drafted for other recent major applications – same wording]</p>	<p><b>Recommended standard LBH Tree Protection (RES8) condition wording:</b></p> <p><i>Trees, hedges and shrubs shown to be retained on the approved plan(s) shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during (or after) construction, or is found to be seriously diseased or dying, another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs' Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.</i></p>
6	Arboricultural Method Statement	<p>Condition RE9 – recommended condition wording set out in committee report.</p>	<p><b>Recommended standard LBH Arboricultural Method Statement (RE9) condition wording:</b></p>

		<p>[Reviewed against conditions drafted for other recent major applications – same wording]</p>	<p>No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:</p> <ol style="list-style-type: none"> <li>1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.</li> <li>2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority. Such fencing should be a minimum height of 1.5 metres. Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed. The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas: <ol style="list-style-type: none"> <li>2.a There shall be no changes in ground levels;</li> <li>2.b No materials or plant shall be stored;</li> <li>2.c No buildings or temporary buildings shall be erected or stationed.</li> <li>2.d No materials or waste shall be burnt; and.</li> <li>2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.</li> </ol> </li> <li>3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.</li> </ol>
7	<b>Air Quality – Low Emission Strategy</b>	Recommended condition wording from LB Hillingdon Air Quality Officer.	<b>Condition wording as recommended by LBH Air Quality Officer:</b>

		<p><i>[Subject to ongoing discussions with GLA Officers regarding Air Quality]</i></p>	<p><i>1. No above ground works shall be undertaken until a clear and effective low emission strategy (LES) have been submitted to and approved in writing by the Local Planning Authority. The strategy shall include, but not be restricted to:</i></p> <ul style="list-style-type: none"> <li><i>a) effective ways to manage contractual arrangements with the occupiers of the flexible commercial use so that the fleet composition serving the site facilities will be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards;</i></li> <li><i>b) provision of a clean supply of energy to the site. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements. The boilers to be specified to meet ultra-low NOx emissions standards of &lt; 40mg/kWh.</i></li> </ul> <p><i>The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority.</i></p> <ul style="list-style-type: none"> <li><i>c) An electric vehicle fast charging bay. This is to be implemented as part of the proposal with the minimum requirements as per the London Plan.</i></li> <li><i>d) a clear and effective strategy to encourage/support staff and residents of the site to</i> <ul style="list-style-type: none"> <li><i>i) use public transport;</i></li> <li><i>ii) cycle / walk to work where practicable;</i></li> <li><i>iii) enter car share schemes;</i></li> <li><i>iv) enter cab share schemes to and from the airport and or home / work locations;</i></li> <li><i>v) purchase and drive to work zero emission vehicles.</i></li> </ul> </li> </ul> <p><i>Measures to support and encourage modal shift, will include but be not restricted to incentives for residents and employees to use public transport to reduce their car ownership.</i></p> <p><i>The measures in the agreed scheme shall be maintained throughout the life of the development.</i></p>
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			<p><b>Reason:</b> As the application site is within an Air Quality Management Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DME1 14 of the emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, and paragraph 170 of the National Planning Policy Framework (2018).</p>
8	<b>Air Quality - Construction</b>	<p>Recommended condition wording from LB Hillingdon Air Quality Officer.</p> <p>[Subject to ongoing discussions with GLA Officers regarding Air Quality]</p>	<p><b>Condition wording as recommended by LBH:</b></p> <ol style="list-style-type: none"> <li>1. No development shall commence until proof of the registration in GLA's database (<a href="http://nrmm.london/nrmm/about/what-nrmm-register">nrmm.london/nrmm/about/what-nrmm-register</a>) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority.</li> <li>2. The London's Low Emission Zone for non-road mobile machinery to comply with the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.</li> <li>3. This will apply to both variable and constant speed engines for both NOx and PM. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments.</li> </ol> <p><b>Reason:</b> Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and London Plan Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition' (2014).</p>
9	<b>Archaeology - Stage 1 Written Scheme of Investigation</b>	<p>Recommended condition wording from Greater London Archaeological Advisory Service (GLAAS).</p>	<p><b>Condition wording as recommended by GLAAS:</b></p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p>

			<p><i>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/ development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</i></p> <p><i>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.</i></p> <p><i>B. The programme for post-investigation assessment and subsequent analysis, publication &amp; dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</i></p>
10	<b>Bird Hazard Management Plan</b>	<p>Comments received from Ministry of Defence Safeguarding Department recommending condition is attached which requires that the development is carried out strictly in accordance with the submitted BHMP and that those measures set out within the BHMP are implemented in perpetuity.</p> <p><i>[Non-standard condition wording proposed – draft condition wording suggested by Knight Frank]</i></p>	<p><b>Non-standard condition – draft wording as proposed by Knight Frank:</b></p> <p><i>The development hereby approved shall be carried out strictly in accordance with the submitted Bird Hazard Management Plan (ref. BMD.19.020.RPE/TN.803.BHMP, September 2019) and shall remain in force for the life of the development.</i></p> <p><b>Reason:</b> <i>In the interests of aircraft safety in compliance with Policy DMAV 1, DMAV2 and DMAV3 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).</i></p>
11	<b>Construction Management Strategy &amp; Crane Details</b>	<p>Recommended condition wording from Ministry of Defence Safeguarding Department.</p>	<p><b>Condition wording as recommended by MOD:</b></p> <p><i>Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence. The Construction Management Strategy shall cover the application site and any adjoining land which will be used during the construction period.</i></p>



			<p><i>Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting).</i></p> <p><i>The approved strategy (or any variation approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence) shall be implemented for the duration of the construction period.</i></p> <p><b>Reason:</b> <i>To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.</i></p>
12	Secured by Design	<p>Comments received from Metropolitan Police recommending that a condition is attached.</p> <p>[Draft condition wording taken from committee report]</p>	<p><b>Condition wording as recommended by Met Police:</b></p> <p><i>(1) Prior to carrying out above grade works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve full Secured by Design Accreditation. The development shall only be carried out in accordance with the approved details.</i></p> <p><i>(2) Prior to the first occupation of each building or part of a building or use, a Secured by Design accreditation shall be obtained for such building or part of such building or use. This will ensure the building has the minimum recommended resilience to crime and anti social behaviour issues that it will face for this area.</i></p> <p><b>Reason:</b> <i>In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to reflect the guidance contained in the Council's SPG on Community Safety By Design and to ensure the development provides a safe and secure environment in accordance with London Plan (2015) Policies 7.1 and 7.3.</i></p>



13	<b>Construction Logistics Plan</b>	<p>Request from Highway Authority for a full and detailed CLP to be secured by condition.</p> <p>[Standard LBH Construction Logistics Plan condition wording taken from another recent major application]</p>	<p><b>Standard LBH Construction Logistics Plan condition wording:</b></p> <p><i>Prior to development commencing, the applicant shall submit a Construction Logistics Plan to the Local Planning Authority for its approval. The plan shall detail:</i></p> <ul style="list-style-type: none"> <li><i>(i) The phasing of development works</i></li> <li><i>(ii) The hours during which development works will occur.</i></li> <li><i>(iii) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).</i></li> <li><i>(iv) 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).</i></li> <li><i>(v) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the construction process.</i></li> <li><i>(vi) The storage of construction materials on site.</i></li> </ul> <p><i>The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.</i></p> <p><b>Reason:</b> To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).</p>
14	<b>Service and Delivery Plan &amp; Site Waste Management Plan</b>	<p>Request from Highway Authority for a full and detailed SDP to be secured by condition.</p> <p>[Standard LBH Service and Delivery Plan condition wording taken from another recent major application which also includes reference to a Site Waste Management Plan]</p>	<p><b>Standard LBH Construction Logistics Plan condition wording:</b></p> <p><i>Prior to occupation of the development, a Service and Delivery Plan and a Site Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, servicing, delivery and collection or refuse shall be carried out as agreed within this approved plan.</i></p>

			<b>Reason:</b> To ensure appropriate servicing of the site, to safeguard highway safety, and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).
15	<b>Commercial Waste Management Plan</b>	<p>Stated in committee report that a condition in relation to a Commercial Waste Management Plan is required.</p> <p>[Could be covered by Service and Delivery Plan &amp; Site Waste Management Plan (see condition 14)]</p>	Query whether this requirement can be covered within Service and Delivery Plan & Site Waste Management Plan Condition (no. 14)?
16	<b>Ground Contamination</b>	<p>Recommended condition wording from Contaminated Land Officer provided.</p> <p>[Alternative condition wording recommended by Delta Simons provided in blue]</p>	<p><b>Condition wording as recommended by Contaminated Land Officer with Delta Simon amends and comments:</b></p> <p><i>An assessment of the risks associated with land contamination has been prepared and submitted to the Local Planning Authority (LPA): Preliminary Geo-Environmental Risk Assessment; Issued: October 2019; Project No. 17-0420.02; Prepared by: Delta-Simons Environmental Consultants Limited.</i></p> <p><i>(i) The development, with the exception of vegetation clearance or demolition works or intrusive investigations, shall not commence until a scheme to deal with contamination has been submitted to the Local Planning Authority (LPA) in accordance with the Supplementary Planning Guidance Document on Land Contamination, and approved by the LPA. The scheme shall include all of the following elements unless the LPA dispenses with any such requirement specifically and in writing:</i></p> <p><i>a) A targeted ground investigation, focusing on areas of potential contaminants at: i) the location of the infilled pond; ii) the location of the underground reservoir / storage tanks to supplement the existing assessment.</i></p> <p><i>The investigation should include, where relevant, soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment.</i></p>

			<p>The assessment shall be carried out by a suitably qualified and experienced consultant/contractor. The report should also clearly identify all pertinent land contamination risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and</p> <p>(b) A written Remediation and Verification Strategy providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement of each phase of development. The Strategy shall include details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.</p> <p>(ii) If during remediation or development works contamination of such extent, quantity or location in excess of that identified in the ground investigations and not addressed in the submitted Remediation and Verification Strategy is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation.</p> <p>(ii) If during remediation or development works contamination of such extent, quantity or location in excess of that identified in the ground investigations and not addressed in the submitted Remediation and Verification Strategy is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation. All works which form part of the remediation scheme in a specific phase shall be completed before any part of the specific phase is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing.</p> <p>(iii) Upon completion of the approved remedial works in the agreed Remediation and Verification Strategy, a comprehensive Verification Report shall be prepared. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved</p>
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			<p>methodology. <i>This Condition shall not be discharged until the Verification Report has been submitted to and approved by the LPA.</i></p> <p>(iv) <i>No waste shall be imported to site. If a requirement to import soils or other materials to site is identified then any such import must be undertaken in accordance with a Materials Management Plan or valid exemption. All imported soils or other materials for landscaping or other purposes shall be imported only in accordance with the agreed Remediation and Verification Strategy, shall be clean and free of contamination / be suitable for the intended use with appropriate independent testing undertaken on the as received materials on site. The results of this testing shall be submitted and approved in writing by the Local Planning Authority prior to occupation. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.</i></p>
17	Wheelchair Parking	Recommended condition wording from LBH Access Officer.	<p><b>Condition wording as recommended by Access Officer:</b></p> <p><i>Not less than one accessible parking space shall be allocated to each Wheelchair Home Standard dwellinghouse, which shall be secured by way of deed or covenant. The accessible parking bays shall accord with the design principles as set out in BS 8300:2018, with all defining features and facilities retained in perpetuity.</i></p> <p><b>Reason:</b> <i>To ensure that sufficient housing stock is provided to meet the needs of wheelchair users in accordance with Policy 3.8(d): Housing Choice of the adopted London Plan (March 2016).</i></p>

18	<b>Wheelchair Housing</b>	Recommended condition wording from LBH Access Officer.	<p><b>Condition wording as recommended by Access Officer:</b></p> <p><i>The development hereby approved shall ensure that 10% of the residential units are constructed to meet the standards for Category 3 M4(3) dwelling, with all remaining units designed to the standards for Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.</i></p> <p><b>Reason:</b> To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 (c) and (d) is achieved and maintained.</p>
19	<b>Approved Document M Building Certificate</b>	<p>Recommended condition wording from LBH Access Officer.</p> <p>[Preference to reword condition to allow post completion assessment to be issued 6 months post completion of units on a block by block basis. Suggested amends in blue / strikethrough.]</p>	<p><b>Condition wording as recommended by Access Officer:</b></p> <p><del>Prior to the occupation of the dwellings hereby approved,</del> a A building completion certificate, issued by Building Control or an equivalent representative body, confirming compliance with the prescribed standards for M4(2) and M4(3) dwellings as set out in Approved Document M to the Building Regulations (2010), 2015 edition, shall be submitted to the Local Planning Authority <i>within 6 months of the completion of the relevant block.</i></p> <p><b>Reason:</b> To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 (c) and (d), is achieved and maintained.</p>
20	<b>Accessible child play space equipment</b>	Recommended condition wording from LBH Access Officer.	<p><b>Condition wording as recommended by Access Officer:</b></p> <p><i>Prior to the occupation of the development hereby approved, details of children's play equipment to be installed, to include young people with sensory and/or complex multiple disabilities, shall be submitted to and approved in writing by the Local Planning Authority; all such provisions shall remain in place for the life of the building.</i></p>

			<p><b>Reason:</b> To ensure that all children and young people, including those with sensory, complex or multiple disabilities, have access to suitable play areas and equipment, in line with London Plan 3.6 and 7.2.</p>
21	<p><b>Accessible external materials</b></p>	<p>Recommended condition wording from LBH Access Officer.</p> <p>[Following review we request that this condition wording is amended to be triggered by commencement of above ground level works of the relevant phase. Proposed alternative trigger wording shown in blue.]</p>	<p><b>Condition wording as recommended by Access Officer:</b></p> <p>No development <i>above ground level within the relevant phase of works</i> shall take place until details have been submitted to and approved in writing by the Local Planning Authority of:</p> <p>(i) an external environment that is conducive to the mobility needs of blind and visually impaired people, to include wayfinding and suitable crossing points, materials and street furniture that provide adequate contrast against which they are seen;</p> <p>(ii) pavers and other surfacing materials that provides wheelchair users with a smooth, seamless surface, with appropriately positioned crossing points. Thereafter, the development shall be implemented in accordance with the approved details and the accessibility features shall thereafter be retained in perpetuity.</p> <p><b>Reason:</b> To ensure that older and disabled people have good access to the development in accordance with policy 7.2 of the London Plan (2016).</p>
22	<p><b>Sustainable Water Management</b></p>	<p>Recommended condition wording from LBH Flood Risk Officer.</p> <p>[Following review we request that this condition wording is amended to be triggered by commencement of above ground level works. Proposed alternative trigger wording shown in blue.]</p>	<p><b>Condition wording as recommended by Flood Risk Officer:</b></p> <p>Prior to commencement <i>of above ground level works</i>, <del>(excluding demolition and site clearance)</del> a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:</p> <p>a) Sustainable Drainage features:</p> <p>i. Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance</p>

			<p><i>with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided.</i></p> <p><i>ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality and amenity benefits.</i></p> <p><i>iii. Runoff rates - surface water discharge from the site must no greater than pre-developed greenfield runoff rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change,</i></p> <p><i>iv. Drainage calculations - include calculations to demonstrate that the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.</i></p> <p><i>v. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and include details on flow paths, depths and velocities. Safe access and egress for the site must be demonstrated.</i></p> <p><i>b) Long-term management and maintenance of the drainage system.</i></p> <p><i>i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.</i></p> <p><i>ii. Include details of the necessary inspection regimes and maintenance frequencies.</i></p>
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			<p>iii. Where managed flooding of the ground surface is proposed, the plan should include the appropriate actions for those areas and document the actions required to ensure the safety of the users of the site during a rainfall event.</p> <p>c) Minimise water use.</p> <p>i. incorporate water saving measures and equipment.</p> <p>ii. provide details of how rain and/or grey water will be recycled and reused in the development.</p> <p>Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.</p> <p><b>Reason:</b> To ensure that surface water run off is controlled and to ensure the development does not increase the risk of flooding in accordance with Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy DME1 10 of the Hillingdon Local Plan: Part 2 (January 2020), Policy 5.12 Flood Risk Management of the London Plan (March 2016), Policy 5.13 Sustainable Drainage of the London Plan (March 2016) and the National Planning Policy Framework (February 2019).</p>
23	Reptile Mitigation Strategy	Recommended condition wording by Ecology Officer set out in committee report.	<p><b>Condition wording as recommended by Ecology Officer:</b></p> <p>Prior to commencement of development, a scheme for the protection of reptiles shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide full details of the likely impacts to reptiles and the proposed measures to secure the protection and conservation of reptiles. The scheme shall demonstrate how reptiles will be accommodated onsite or offsite before, during and after construction as well as proposals for translocation offsite if necessary. No works, including site clearance, must commence until the scheme has been fully agreed and the measures for protection</p>



			<p><i>secured and implemented where necessary. The development must then proceed in accordance with the mitigation strategy.</i></p> <p><b>Reason:</b> <i>To ensure the protection of reptiles in accordance with EM7 of the Local Plan.</i></p>
24	<b>Bat Scoping Study</b>	<p>Recommended condition wording by Ecology Officer set out in committee report.</p>	<p><b>Condition wording as recommended by Ecology Officer:</b></p> <p><i>Prior to the commencement of development an updated bat scoping study shall be submitted for the whole site (including the tree belt on the northern part of the site). The study shall include recommendations for any further surveys and submitted to and approved in writing by the Local Planning Authority. If the study recommends further surveys, then these will need to be carried out prior to any clearance work unless agreed otherwise in writing with the Local Planning Authority; the results of the further surveys shall be submitted to and agreed in writing with the Local Planning Authority. The development must proceed in accordance with the studies and surveys and include any recommended mitigation as deemed necessary unless otherwise agreed in writing with the Local Planning Authority.</i></p> <p><b>Reason:</b> <i>To secure up to date information on the importance of the site for bats to mitigate any impacts in accordance with EM7 of the Local Plan.</i></p>
25	<b>Low and Zero Carbon Energy Technologies</b>	<p>Recommended condition wording by Energy Officer set out in committee report.</p> <p>[Suggested alternative condition wording proposed by Cudd Bentley shown in blue]</p>	<p><b>Condition wording as recommended by Energy Officer:</b></p> <p><i>Prior to above ground works, full details of the low and zero carbon energy technologies as proposed in the energy assessment (Cudd Bentley, JR/5550/17) shall be submitted to and approved in writing by the Local Planning Authority. The details shall include full specifications of the technology and equipment to be used, their location on the site, and how they meet the energy and co2 reduction targets identified in the energy assessment. The details shall also include noise assessments for the air source heat pumps, roof and elevation plans for the PVs (as well as fixing mechanisms and sunlight assessment), and</i></p>

			<p><i>maintenance schedules for both technologies. Finally the details shall also include proposals to monitor performance of the technology and how this will be reported to the Council on an annual basis. <del>The development must proceed in accordance with the approved details and technology must deliver the agreed CO2 reduction targets.</del> The development must proceed in accordance with the approved details and CO2 reductions achieved by the technologies proposed reported annually for a 3 year period from occupation.</i></p> <p><b>Reason:</b> To ensure the development contributes to a reduction in CO2 in accordance with Policy 5.2 of the London Plan.</p>
26	Energy – PV's	<p>Request from GLA Energy Officer for a condition requiring details of the PV proposals prior to the commencement of above ground works to demonstrate that PV has been maximised.</p> <p>[Following review we request that this condition wording is amended to be triggered by pre-occupation of the relevant phase.]</p>	<p>GLA to provide draft condition wording for agreement.</p>
27	CEMP	<p>Stated in committee report that a condition in relation to CEMP is required. No wording recommended.</p> <p>[Standard LBH Construction Environmental Management Plan condition wording taken from other recent major applications]</p>	<p><b>Standard LBH CEMP condition wording:</b></p> <p><i>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></p> <ul style="list-style-type: none"> <li><i>(i) The phasing of development works</i></li> <li><i>(ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).</i></li> <li><i>(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.</i></li> </ul>

			<p>(iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).</p> <p>(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).</p> <p>(vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.</p> <p>(vii) The storage of demolition/construction materials on site.</p> <p>The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.</p> <p><b>Reason:</b> To safeguard the amenity of surrounding areas in accordance with Policy DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)</p>
28	<b>Final Car Parking Management Plan / Parking Management Strategy</b>	Stated in committee report that a condition to secure a Final Car Parking Management Plan / Parking Management Strategy is required. No recommended wording provided.	
29	<b>Final Travel Plan</b>	Stated in committee report that a condition to secure a Final Travel Plan is required. No recommended wording provided.	GLA to provide draft condition wording.
30	<b>Commercial and Plant Noise Assessment and Limits</b>	Stated in committee report that a condition in relation to commercial and plant noise assessment and limits is required. No recommended wording provided.	GLA to provide draft condition wording.

31	<b>Noise Mitigation, Ventilation and Cooling Strategy</b>	Stated in committee report that a condition in relation to noise mitigation, ventilation and cooling strategy is required. No recommended wording provided.	GLA to provide draft condition wording.
32	<b>Provision of Electric Vehicle Charging Points</b>	<p>Stated in committee report that a condition is required to secure the provision of EVCPs. No recommended wording provided.</p> <p>Electric Vehicle Charging Points (EVCP's) are proposed on site at a ratio of 20% active and 80% passive spaces.</p> <p>[Standard LBH Construction Logistics Plan condition wording taken from another recent major application but amended (in blue) to refer to proposed EVCP provision]</p>	<p><b>Example EVCP condition wording taken from major planning application:</b></p> <p><i>Prior to the commencement of the superstructure a plan showing provision for electric charging points to serve 20% active and 80% passive car parking spaces should be submitted to and approved in writing by the Local Planning Authority. The plan shall set out the location of the charging points, the chosen technology and clear presentation of how the bays will be marked. The development shall proceed in accordance with the approved plan.</i></p> <p><i>REASON To provide car parking for electric vehicles to help tackle air quality impacts and meet the climate change challenges in accordance with Policy 6.13 of the London Plan (2016).</i></p>
33	<b>Provision of Motorcycle Spaces</b>	Stated in committee report that a condition is required to secure the provision of motorcycle spaces. No recommended wording provided.	<p>8no. motorcycle spaces to be provided.</p> <p>GLA to provide draft condition wording.</p>
34	<b>Cycle Parking Review</b>	Stated in committee report that a condition is required to secure a cycle parking review. No recommended wording provided.	GLA to provide draft condition wording.
35	<b>Monitoring of Highway Road</b>	Request from Highway Authority for the monitoring of the extent of surrounding highway road network at	GLA to provide draft condition wording.

		intervals to be secured by condition. No recommended wording provided.	
36	<b>Highway Safety Audit</b>	Request from Highway Authority for a planning condition securing a Highway Safety Audit and improvements to the service road approach in Freezeland Way subject to the findings of the survey. This would include the introduction of a 'No-entry' prohibition at the western end of the service road in proximity of the site entrance. No recommended wording provided.	GLA to provide draft condition wording.
37	<b>Urban Greening Factor</b>	Stated in committee report that a condition is required to secure the delivery of the 0.4 UGF. No recommended wording provided.	GLA to provide draft condition wording.
38	<b>Fire Strategy</b>	Stated in committee report that a condition to secure the submission, agreement and implementation of a detailed Fire Strategy this is required. No recommended wording provided.	GLA to provide draft condition wording.
39	<b>CIL Phasing Plan</b>	Request that a condition be included to enable phasing of development for the purposes of CIL. Suggested condition wording provided.	<p><b>Draft wording as proposed by Knight Frank:</b></p> <p><i>Prior to the commencement of any CIL phase, a CIL phase plan setting out the scope of that CIL phase together with a CIL Additional Information Requirements Form shall be submitted to the Council.</i></p> <p><i>Reason: To allow CIL liability to be calculated for each phase and for any reliefs to be determined.</i></p>

40	District Heating Network	Condition to be attached to require the scheme to be designed to connect to or not prejudice the future connection to any relevant existing DHN connection opportunities or any other heat supply scheme.	GLA to provide draft condition wording.
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## **Hillingdon Gardens – Design Update Summary**

May 2020

The following summary provides an overview of the proposed design updates to be incorporated into the Hillingdon Gardens scheme. These minor adjustments are the result of further detailed design progression, capturing layout efficiencies and necessary strategy updates.

This summary should be read in conjunction with the corresponding drawing mark-ups, which identify the proposed adjustments.

<b>Building No's</b>	<b>Updates</b>
All Buildings	<ul style="list-style-type: none"> <li>Area schedule updated to suit revised layouts – internal layout tweaks.</li> <li>Please refer to Area Schedule P4 and Dwelling Schedule P6 enclosed. A summary of the area and unit mix adjustments are also summarised below for ease.</li> </ul>
Building 1	<ul style="list-style-type: none"> <li>Dry riser position incorporated to suit hydrant requirements and fire tender locations within site layout.</li> <li>Riser space now included for commercial requirements to roof space.</li> <li>Roof plans updated for commercial plant space allocation. Sufficient space provided to meet the requirements for each use class as currently flexible. To be revised accordingly subject to end user specification. Details to be provided once known.</li> <li>Potential DHN plant room space indicated within cycle store area.</li> <li>Permanent maintenance access from stair core added and indicated residential plant requirements.</li> <li>Internal amenity to faceted 1B2P (101.03).</li> <li>Communal areas updated to suit compliant fire strategy.               <ul style="list-style-type: none"> <li>Riser door positions altered &amp; communal risers included. Communal risers indicated to suit installations and accesses correctly to meet fire strategy.</li> <li>Risers still located within sterile lobbies for wet services only (water).</li> </ul> </li> <li>Sixth floor parapet to perimeter terraces increased to meet AD Part K height and omit metalwork balustrading.</li> <li>Refined window design with reduced transparent glass areas in line with overheating requirements. DLSL has been assessed accordingly.</li> <li>Recessed balconies updated to provide containment with metal balustrading to suit new building regulations in lieu of laminate glass.</li> </ul>
Buildings 2/3/4	<ul style="list-style-type: none"> <li>1B2P added to B2 at first floor along with podium access route allowing for SBD compliance within building.</li> <li>Subsequent minor reduction to commercial floorspace – refer to area schedule P4 and area summary below.</li> <li>2No units in B4 (401.03 &amp; 401.04) replaced with 3B6P retaining 514No. total units (to suit Building 2 updated for podium access).</li> <li>Internal amenity update to sixth floor units due to soffit servicing zone allowances to units beneath.</li> <li>Dry riser position incorporated to suit hydrant requirements and fire tender locations within site layout.</li> <li>Natural car park ventilation provisions provided with louvre screened penetrations and podium telescopic vent.</li> <li>Potential sub-divisions with commercial spaces indicated.</li> <li>Roof plans updated for commercial plant space allocation. Sufficient space provided to meet the requirements for each use class as currently flexible. To be revised accordingly subject to end user specification. Details to be provided once known.</li> </ul>

	<ul style="list-style-type: none"> <li>• Permanent maintenance access from stair core added and indicated residential plant requirements.</li> <li>• Communal areas updated to suit compliant fire strategy. <ul style="list-style-type: none"> <li>○ B2 lift &amp; riser positions flipped with first floor access onto podium.</li> <li>○ B3 lift &amp; riser positions flipped.</li> <li>○ B4 natural/mechanical shaft provisions included to all upper floors.</li> <li>○ Communal risers indicated to suit installations and accesses correctly to meet fire strategy.</li> <li>○ Risers still located within sterile lobbies for wet services only (water) – excluding B4 due to differing natural/mechanical shaft strategy.</li> </ul> </li> <li>• B2 &amp; B3 glass balustrading on rooftop terrace areas swapped in favour of metal balustrading to meet non-combustible building regulations.</li> <li>• Natural/mechanical ventilation shaft terminations now included to roof.</li> <li>• Refined window design with reduced transparent glass areas in line with overheating and DSL requirements. DLSL has been assessed accordingly.</li> <li>• 2No. sixth floor unit windows reduced to coordinate internal partitions between KLD and Bed3. DLSL has been assessed accordingly.</li> </ul>
Building 5	<ul style="list-style-type: none"> <li>• Sub-station moved externally to simplify structural and fire safety designs.</li> <li>• 400mm ramp/fall into car park area to increase clear headroom for disabled spaces.</li> <li>• Dry riser position incorporated to suit hydrant requirements and fire tender locations within site layout.</li> <li>• Natural car park ventilation provisions provided with acoustic louvre screened penetrations.</li> <li>• Permanent maintenance access from stair core added and indicated residential plant requirements.</li> <li>• Communal areas updated to suit compliant fire strategy. <ul style="list-style-type: none"> <li>○ Sub-station removed, communal door positions on each floor separating sterile lobby. Communal risers indicated to suit installations and accesses correctly to meet fire strategy.</li> <li>○ Risers still located within sterile lobbies for wet services only (water).</li> </ul> </li> <li>• Refined window design with reduced transparent glass areas in line with overheating requirements. DLSL has been assessed accordingly.</li> </ul>
Building 6/7/8	<ul style="list-style-type: none"> <li>• 400mm ramp/fall into car park areas to increase clear headroom for disabled spaces.</li> <li>• 6No. units at 5<sup>th</sup> floor levels now with balcony amenity space in lieu of mid-rooftop terraces (plots 605/705/805.01 &amp; 02).</li> <li>• 6No. units at 6<sup>th</sup> &amp; 7<sup>th</sup> floor levels swapped onto south elevations to match adjacent plots and provide preferable amenity space (plots 606/607/706/707/806/807.01).</li> <li>• Dry riser positions incorporated to suit hydrant requirements and fire tender locations within site layout.</li> <li>• Natural car park ventilation provisions provided with acoustic louvre screened penetrations.</li> <li>• Permanent maintenance access from stair core added and indicated residential plant requirements.</li> <li>• Communal areas updated to suit compliant fire strategy. <ul style="list-style-type: none"> <li>○ B6 communal door positions altered.</li> <li>○ B7 communal door positions altered.</li> <li>○ B8 communal door positions altered.</li> <li>○ Communal risers indicated to suit installations and accesses correctly to meet fire strategy.</li> <li>○ Risers still located within sterile lobbies for wet services only (water).</li> </ul> </li> <li>• Reduced metal balustrading to buildings at fifth floor roof area, parapet heights retained and fall restraint lines to be used for maintenance.</li> </ul>



	<ul style="list-style-type: none"> <li>Refined window design with reduced transparent glass areas in line with overheating requirements. DLSL has been assessed accordingly.</li> </ul>
Building 9	<ul style="list-style-type: none"> <li>Dry riser position incorporated to suit hydrant requirements and fire tender locations within site layout.</li> <li>2B3P replacing 1B2P-W units as per previous directive on disabled access/parking.</li> <li>Communal areas updated to suit compliant fire strategy.</li> <li>Communal risers indicated to suit installation.</li> <li>Refined window design with reduced transparent glass areas in line with overheating requirements. DLSL has been assessed accordingly.</li> </ul>
Building 10	<ul style="list-style-type: none"> <li>Internal amenity update to sixth floor units due to soffit servicing zone allowances to units beneath.</li> <li>Dry riser positions incorporated to suit hydrant requirements and fire tender locations within site layout.</li> <li>Permanent maintenance access from stair core added and indicated residential plant requirements.</li> <li>Communal areas updated to suit compliant fire strategy. <ul style="list-style-type: none"> <li>B10 natural/mechanical shaft provisions included to all upper floors.</li> </ul> </li> <li>Glass balustrading on rooftop terrace areas swapped in favour of metal balustrading non-combustible building regulations.</li> <li>Natural/Mechanical shafts terminations now included to roof.</li> <li>Refined window design with reduced transparent glass areas in line with overheating and DSL requirements. DLSL has been assessed accordingly.</li> <li>2No. sixth floor unit windows reduced to coordinate internal partitions between KLD and Bed3. DLSL has been assessed accordingly.</li> </ul>
Buildings 11 & 12	<ul style="list-style-type: none"> <li>B12 sub-station moved externally (along site road opposite B10) to simplify structural and fire safety designs.</li> <li>Dry riser positions incorporated to suit hydrant requirements and fire tender locations within site layout.</li> <li>Permanent maintenance access from stair core added and indicated residential plant requirements.</li> <li>Refined window design with reduced transparent glass areas in line with overheating requirements. DLSL has been assessed accordingly.</li> </ul>

**Area Schedule Changes**

Use	Submitted October 2019		Proposed May 2020		Difference	
	GEA	GIA	GEA	GIA	GEA	GIA
Flexible Commercial (A1/A3/B1/D1)	1,258.7 sqm	1,120.7 sqm	1,141 sqm	925.9 sqm	-117.7 sqm	-194.8 sqm
Other (substation)	42.8 sqm	29.9 sqm	69.1 sqm	48.0 sqm	+26.3 sqm	+18.1 sqm
Residential	50,374.2 sqm	46,090.9 sqm	50,818.5 sqm	46,546.8 sqm	+444.3 sqm	+455.9 sqm
<b>TOTAL</b>	<b>51,675.7 sqm</b>	<b>47,241.5 sqm</b>	<b>52,028.6 sqm</b>	<b>47,520.7 sqm</b>	<b>+352.9 sqm</b>	<b>+279.2 sqm</b>

The changes to floorspace areas are a result of minor layout efficiencies within the existing building footprint such as increased residential plant areas; internalisation of some private amenity spaces; increased residential area with amenity deck access etc.. The overall building footprint is unchanged.

**Unit Mix Changes**

	Submitted October 2019								Proposed May 2020								Difference
	1B1P	1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	TOTAL	1B1P	1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	TOTAL	
Building 1	0	34	8	19	0	0	0	61	0	34	8	19	0	0	0	61	N/A
Building 2	0	22	0	2	0	13	0	37	0	23	0	2	0	13	0	38	+1 1B2P
Building 3	0	3	5	14	0	13	0	35	0	3	5	14	0	13	0	35	N/A
Building 4	0	1	12	17	3	11	2	46	0	5	6	17	3	13	1	45	+4 1B2P -6 2B3P +2 3B5P -1 3B6P
Building 5	0	41	20	3	0	0	0	64	0	41	20	3	0	0	0	64	N/A
Building 6	0	23	8	13	0	0	1	45	0	23	8	13	0	0	1	45	N/A
Building 7	0	23	8	13	0	0	1	45	0	23	8	13	0	0	1	45	N/A
Building 8	0	23	0	21	0	0	2	46	0	23	0	21	0	0	2	46	N/A
Building 9	0	5	5	0	0	5	0	15	0	0	10	0	0	5	0	15	-5 1B2P +5 2B3P
Building 10	0	12	10	2	0	24	2	50	0	12	10	2	0	26	0	50	+2 3B5P -2 3B6P
Building 11	0	17	0	18	0	0	0	35	0	17	0	18	0	0	0	35	N/A
Building 12	0	17	0	18	0	0	0	35	0	17	0	18	0	0	0	35	N/A
<b>TOTAL</b>	<b>0</b>	<b>221</b>	<b>76</b>	<b>140</b>	<b>3</b>	<b>66</b>	<b>8</b>	<b>514</b>	<b>0</b>	<b>221</b>	<b>75</b>	<b>140</b>	<b>3</b>	<b>70</b>	<b>5</b>	<b>514</b>	<b>-1 2B3P +4 3B5P -3 3B6P</b>
%	0%	43%	14.8%	27.2%	0.6%	12.8%	1.6%	100%	0	43%	14.6%	27.2%	0.6%	13.6%	1%	100%	
%	43%		42%		15%			100%	43%		42%		15%			100%	

The above unit mix summary schedule demonstrates that although changes to the residential unit mix are proposed, these are minor in nature and do not represent a material change in planning terms. The overall percentage of one, two and three bedroom units remains un-changed and acceptable in planning policy terms.

# Hillingdon Gardens (Ref. 4266/APP/2019/3088)

## Section 106 Draft Heads of Terms Review

20 January 2020

The following table provides a summary of the draft Section 106 (s106) heads of terms (HOT) identified in relation to the previous planning application submission (ref. 4266/APP/2017/ 3183) for the re-development of the former Master Brewer Motel site alongside an updated list of suggested draft HOT to support the current 2019 planning application submission (ref. 4266/APP/2019/3088) for review, discussion and agreement with the London Borough of Hillingdon.

Red text identifies suggested revisions or additions for discussion/agreement.

HOT	Ref. 4266/APP/2017/ 3183 (2017) Draft HOTs	Ref. 4266/APP/2019/3088 (2019) Draft HOTs																																		
Transport	A s278 and/or s38 agreement will be entered into to address any and all on site and off-site highways works as a result of this proposal. These include the following: <ul style="list-style-type: none"><li>Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities,</li><li>Improved pedestrian and cycling facilities throughout the signalled junction. · Potential improvements to the service road approach in Freezeland Way (fronting the site).</li><li>The creation of a new public realm 'Gateway' fronting the site on Freezeland Way. · Enhanced bus stop provisions for the 'Oxford Tube' bus service, · Monitoring of signal optimisation @ Hillingdon Circus,</li><li>Contingency monies to remedy any parking displacement onto the public highway (£20,000), · Review of local public lighting, road signage and marking provisions,</li><li>Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable.</li><li>Implementation of vehicle actuated speed signs (up to a cost of £5,000).</li></ul>	A s278 and/or s38 agreement will be entered into to address any and all on-site and off-site highways works as a result of this proposal. <ul style="list-style-type: none"><li>Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities,</li><li>Improved pedestrian and cycling facilities throughout the signalled junction. · Potential improvements to the service road approach in Freezeland Way (fronting the site).</li><li>The creation of a new public realm 'Gateway' fronting the site on Freezeland Way. · Enhanced bus stop provisions for the 'Oxford Tube' bus service, · Monitoring of signal optimisation @ Hillingdon Circus,</li><li>Contingency monies to remedy any parking displacement onto the public highway (£20,000), · Review of local public lighting, road signage and marking provisions,</li><li>Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable.</li><li>Implementation of vehicle actuated speed signs (up to a cost of £5,000).</li></ul>																																		
	Parking Permit free development for all future residents	Parking Permit free development for all future residents																																		
	Car Club with 3 years free membership	Car club membership and bays – scope for up to 4 bays, with one bay/car provided upon initial occupation. Three years annual membership per household upon first occupation																																		
Public Transport Infrastructure	A 5 year public transport contribution toward a new bus service (£375,000); Bus priority measures (£30,000) Travel Plan initiatives/incentives with a financial performance bond (£20,000)	Bus improvement contribution – £1.365m (£455,000 per annum (3 years)) contribution towards the new 278 bus service running N/S along Long Lane from Ruislip to Heathrow, plus £30,000 contribution towards bus priority measures Travel Plan initiatives/incentives with a financial performance bond (£20,000), including: <ul style="list-style-type: none"><li>On-site cycle hub – repair and maintenance facilities as well as Brompton / traditional cycle hire</li><li>Continuous access and operation of the cycle 'hub' (in line with TfL request)</li><li>Oyster card – one complementary oyster card with £40 credit per household upon first occupation (loaded oyster cards)</li><li>Electric vehicle charging provision – 20% with active facilities, with the remainder all featuring passive provision.</li></ul>																																		
Affordable Housing	Either 153 units (35%) as affordable housing, comprising 10 units in as Shared Ownership (41%) 90 units as London Affordable Rent (59%) or 174 units (40%) as affordable housing, (assuming grant funding of £28,000 per unit is available), comprising 68 units as Shared Ownership (39%) 106 units as London Affordable Rent (61%)  None of the market housing will be occupied until 100% of the affordable housing is delivered.	<table><tr><th colspan="7">HILLINGDON GARDENS AFFORDABLE HOUSING BREAKDOWN</th></tr><tr><th rowspan="2"></th><th colspan="2">Intermediate (Shared Ownership)</th><th colspan="2">Rented</th><th colspan="2">Subtotal</th></tr><tr><th>no.</th><th>% of total Affordable</th><th>no.</th><th>% of total Affordable</th><th>no.</th><th>% of total unit/HR provision</th></tr><tr><td>UNITS</td><td>61</td><td>33.5%</td><td>121</td><td>66.5%</td><td>182</td><td>35.4%</td></tr><tr><td>HABITABLE ROOMS</td><td>149</td><td>30.3%</td><td>343</td><td>69.7%</td><td>492</td><td>35.2%</td></tr></table>	HILLINGDON GARDENS AFFORDABLE HOUSING BREAKDOWN								Intermediate (Shared Ownership)		Rented		Subtotal		no.	% of total Affordable	no.	% of total Affordable	no.	% of total unit/HR provision	UNITS	61	33.5%	121	66.5%	182	35.4%	HABITABLE ROOMS	149	30.3%	343	69.7%	492	35.2%
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HABITABLE ROOMS	149	30.3%	343	69.7%	492	35.2%																														
Construction Training	Either a construction training scheme delivered during the construction phase of the development or a financial contribution secured equal to the formula as contained in the SPD (£2,500 for every £1m build cost + (total gross floor area/7,200m2 x £71,675) = total contribution)	Either a construction training scheme delivered during the construction phase of the development or a financial contribution secured equal to the formula as contained in the SPD (£2,500 for every £1m build cost + (total gross floor area/7,200m2 x £71,675) = total contribution)																																		

Landscape Screening and Ecological Mitigation	A financial contribution in the sum of at least £252,308.88.	A financial contribution to secure landscape enhancement of the Green Belt land to the east of the development site.
Air Quality	A financial contribution in the sum of £247,906.	Update to follow once additional data available.
Carbon Fund	A carbon fund to make up for the shortfall for this development and to make it policy compliant - Shortfall (tCO2) x Cost per carbon tonne (£) x 30 (years) 176.26 x 60 x 30 = £317,268.	A financial contribution in the sum of £586,422.00 - £60 per tonne of carbon dioxide for a period of 30 years, as set out in Cudd Bentley's submitted Energy Statement.
Project Management and Monitoring Fee	A contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement. Contributions towards education, health, libraries and community facilities are now covered by the Hillingdon Community Infrastructure Levy.	A contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement. Contributions towards education, health, libraries and community facilities are now covered by the Hillingdon Community Infrastructure Levy.
Met Policing	-	Provision of facilities to support Dedicated Ward Officer (DWO) requirements.

### Community Infrastructure Levy

#### Suggested phasing

- Enabling Works
  - o Start – 21/09/2020
  - o End – 13/11/2020
- Phase 1 (Building 1)
  - o Start – 19/10/2020
  - o End – 28/03/2022
- Phase 2 (Buildings 2, 3 & 4)
  - o Start – 10/05/2021
  - o End – 20/02/2023
- Phase 3 (Building 5, 6, 7, 8 & 9)
  - o Start – 28/03/2022
  - o End – 29/04/2024
- Phase 4 (Buildings 10, 11, 12)
  - o Start – 19/06/2023
  - o End – 17/02/2025

#### Suggested planning condition

“Prior to the commencement of any CIL phase, a CIL phase plan setting out the scope of that CIL phase together with a CIL Additional Information Requirements Form shall be submitted to the Council.

Reason: To allow CIL liability to be calculated for each phase and for any reliefs to be determined.”

# Agenda

**Subject:** Hillingdon Gardens – GLA Follow-up Pre-Application (4)

**Location:** City Hall

**Date:** 24 July 2019

**Time:** 4pm

**Attendees:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED])

**Apologies:** n/a

Item no.	Agenda item	Responsibility	Duration
1.	Update following last meeting <ul style="list-style-type: none"> <li>Meetings</li> <li>Initial pre-application advice</li> </ul>	IH/GLH	5 mins
2.	Review of issues raised in relation to previous proposal <ul style="list-style-type: none"> <li>Overview of how revised proposal responds</li> </ul>	CC	10 mins
3.	Detailed Design Presentation <ul style="list-style-type: none"> <li>Reminder of illustrative masterplan</li> <li>Architectural approach to the scheme</li> <li>Updates in relation to housing numbers; density; mix; affordable housing</li> <li>Review of floorplans</li> <li>Landscaping plan</li> <li>Child play space</li> </ul>	CC	40 mins
4.	Forthcoming Meetings <ul style="list-style-type: none"> <li>Public Exhibition</li> <li>Pre-application meeting with LB Hillingdon</li> <li>DIO</li> </ul>	IH/GLH	5 mins
5.	AOB and Next Meeting	ALL	-

**‘Hillingdon Gateway’ – Former Master Brewer Motel site, Freezeland Way, Hillingdon**

Ref. 4266/APP/2017/3183

The following table provides summarised responses to the reasons for refusal identified within the Officer's Committee Report (to be presented on 19 February 2019) pursuant to the above-mentioned planning application.

It is acknowledged that officers of the Local Planning Authority do not object to the principle of the comprehensive redevelopment of the site, as established by national, strategic and local level planning policy.

Reason for Refusal	Summary Response
<p><b>Design</b></p> <p>The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt and would mar the skyline, contrary to Policies BE1 and EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies OL3, OL5, OL26, BE13, BE19, BE21, BE26, BE38, OE1 and PR23 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policies DMHB 10, DMHB 11, DMHB 12, DMHB 14, DMHB 17, DME1 6; Policies 7.4 and 7.6 of the London Plan, the Council's Supplementary Planning Guidance "Design Guide – Residential Layouts</p>	<p><u>Scale, Bulk, site coverage</u></p> <p>The proposal has been designed to make efficient use of previously developed (brownfield) land, improving access and enhancing the setting of the adjacent Green Belt by remedying a derelict site (which currently detracts from the Local Centre and the adjacent Green Belt setting), whilst also creating a new neighbourhood with clearly defined links to North Hillingdon Local Centre. Owing to the site being self-contained, separated (visually and physically) by the surrounding highways network, the design promotes a transitional development between the context of the Local Centre and the more typical ‘suburban’ residential typology of the surrounding area. Due to the size and relative isolation of the site from the surrounding built environment, the opportunity has been taken to make efficient use of the site whilst balancing this against associated constraints.</p> <p>Careful design, with regard to scale and massing, has ensured that the buildings located in proximity to the Green Belt are sensitively positioned and stepped down in height to this edge, consistent with the principle of the previous resolution scheme. Where height and increased scale is proposed, along the west and north boundary, it has been adopted to provide a distinct and protective edge to the central amenity area, protecting the site from road noise and pollution through the use of continuous built volumes. The perimeter buildings are also carefully articulated with alternating heights and façade alignments to create a visually interesting townscape.</p> <p>The tallest buildings are positioned to create two focal points within the site and take advantage of topography changes, particularly in the north west corner.</p> <p>The architectural character and language of the proposal are based on two combinations of forms, materials, colours and textures: (1) long frontages, brick facades, and earth tones on the “edge buildings”, evoking the residential terraces and courtyards continuing from Long Lane; (2) free-standing volumes, smooth tiled facades, and green tones on the central buildings, evoking pavilions within a landscape connected to the Green Belt land. This response to the local context is aimed at providing interest and animation to the local area.</p>

<p>and House Design", emerging Policy SA 14 'Master Brewer and Hillingdon Circus' of the Local Plan: Part Two Site Allocations and Designations and the NPPF (2018).</p>	<p>The proposal responds to the criteria identified under draft Policy SA14 (as updated by the SOPM 2018) which identifies the site as having a potential capacity of 250 -330 units, whilst acknowledging that the actual capacity of the site should be determined by a design-led approach.</p> <p>The general principles of massing and gradation of building heights were agreed during pre-application consultation. Based upon these general principles, the original August 2017 submission complied with the objective policy requirements for separation distances and amenity provision, and was positively evaluated by the GLA in terms of housing design quality, potentially delivering 377 new homes. The several iterations of the scheme produced since the original August 2017 submission have provided the opportunity to develop the design-led approach. Thus, although the number of dwellings has increased from 377 to 437, the building footprints and envelope have not changed. The increase was made possible by an optimisation of the building layouts (more of which benefit from external balconies in the current proposal) and by a decrease in the average number of habitable rooms per dwelling (from 2.94 to 2.72), combined with a reduction of the parking provision (following GLA advice). Notwithstanding the increase in the number of dwellings, the landscape design has also been improved, ensuring an amenity provision (including play space) above the statutory requirements. Thus, the proposed site coverage has been achieved by adjusting the number of dwellings, the average number of habitable rooms per dwelling (i.e. the typology mix), and the number of parking spaces to an optimal balance aimed at satisfying all the consultees and delivering new homes on a brownfield site in a prominent location.</p> <p><u>Height</u></p> <p>The proposal submitted introduces a collection of buildings within the site that range from 4 to 9 storeys.</p> <p>The argument for buildings of height in this location has been informed by a number of technical assessments that consider the social and economic impacts of high buildings on the surrounding area. These include but are not limited to a Townscape and Visual Impact Assessment and a Daylight/Sunlight Assessment, which have influenced the emerging proposal to determine heights appropriate for this location. The impacts of development on the Green Belt, skyline, townscape and nearby airport operations have been duly considered to ensure heights are appropriate for the site's location.</p> <p>The building heights have been carefully considered to adhere to principles of good design. The use of an 8 storey building at the site entrance on the corner of Long Lane and Freezeland Way provides a landmark building at the entrance to the site, re-instating 'the Circus'. The location of the tallest building of 9 storeys has been carefully considered to be placed in the north western corner of the site, reducing any impacts on nearby properties, whilst responding to the boundary conditions to the north and west of the site, which are significant constraints.</p> <p>The proposal presents a well-considered approach to building heights to respond to the characteristics of the site including topography and its location within a designated Local Centre, the vitality, viability and economic growth of which LB Hillingdon should continue to support.</p>
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#### Townscape Character

As reported in the Townscape & Visual Impact Assessment, updated to align with the November 2018 scheme and submitted ahead of the Planning Committee Meeting on 19<sup>th</sup> February 2019:

- The area around the Site is heavily influenced by major road infrastructure. Substantially wide roads are located to the north, west and east of the Site, with the crossing of Long Lane over the A40 and the major road junction between Long Lane and Freezeland Way / Western Avenue having a dominant influence on the immediate streetscape / townscape. Hillingdon Station and its associated bridges combine with the above to dominate the townscape to the north-west of the Site. These influences, including that of the Site are significantly reduced beyond the A40 to the north, as a result of localised topographical changes associated with this transport infrastructure, combined with the extent of intervening built form and vegetation.
- The condition of the townscape of the North Hillingdon Local Centre and its surrounding proximity is considered to be poor and of low value, dominated by the large junction of Long Lane with Freezeland Way / Western Avenue (as the historic alignment of the A40). The Local Centre is comprised of an eclectic mix of buildings with a range of façade detailing and uses - many of which are of poor visual quality - with no sense of unification or focus and has a lack of cohesive vernacular. This is exacerbated by the influence and separation resulting from intervening highways.
- Buildings in close proximity to the Site are generally 2-3 storeys in height. Combined with the largely flat low-lying topography beyond the A40 (north and south), this built form significantly limits views toward the Site and the proposed heights of development.
- There is a significant strip of vegetation along the north and west boundaries that would be retained as part of the development and supplemented with additional planting as shown on the Landscape Plans submitted with this application. This vegetation would serve to soften views of the development, whilst serving to 'ground' its built form.
- The height and hierarchy of built form across the scheme is varied to contribute positively to the character of the townscape within and beyond the site, allowing for legibility between these carefully positioned buildings, enhanced further through the establishment of proposed green infrastructure.

**The scheme is a significant opportunity to provide a landmark development to form a positive gateway into North Hillingdon and a strong backdrop and focal point, unifying the Local Centre.**

#### Density/Character

The relevant policies in the London Plan are clear that the residential densities set out in the SRQ Density Matrix should not be applied mechanistically. In addition, site specific factors should be taken into consideration when arriving at an appropriate density.

When applying the SRQ Density Matrix, in terms of defining the 'setting' of the development site, Paragraphs 1.3.31 - 1.3.33 of the Mayor of London's Housing SPG states:

***"Defining the setting of an area requires local knowledge and may entail an element of professional judgement, recognising the character of an area can change over time...In locations where there is scope for intensification and change, particularly on large sites, 'setting' for the purposes of Table 3.2 should not be defined in a static way in relation to the character of the surroundings area, without considering: the potential for large sites to define their own characteristics in terms of setting and densities; and for new development to be successfully integrated into its immediate context through considerate design"***

The guidance goes on to state (Paragraph 1.3.36) that:

***"In situations where the setting is not already defined, prospective developers should seek to agree the setting (and PTAL ratings) of a site with the borough at an early stage. If agreement cannot be reached they should include their rationale in the Design and Access Statement"***.

Thus it can be considered that the Housing SPG lends further support to taking a flexible interpretation of what constitutes the 'setting' of a site for the purposes of applying the SRQ Density Matrix, particularly in relation to large sites which have strategic importance and can contribute to delivering strategic housing need.

Whilst the wider prevailing pattern of development is 'suburban' in nature (with reference to the criteria set out in Table 3.2 of the London Plan), we consider that the immediate site specific context should be considered as 'urban'. Individual characteristics and material considerations can support the identification of the site as an 'urban' site, albeit within a wider defined 'suburban' context including,

- The location of the site within the North Hillingdon Local Town Centre;
- Its proximity to local amenities and services;
- Its proximity to sustainable public transport links; and
- the previously permitted scheme was of a scale and nature that was appropriate for an 'urban' location.

Indeed, the urban character of the site and immediate Local Centre is acknowledged by officers within the committee report where it is discussed that ***"the urban character of the site and that of Hillingdon Circus needs to be tempered with that of the surrounding suburban residential area adjoining North Hillingdon and Ickenham to the north"*** (paragraph 7.07 (5)) (our emphasis).

The proposed density is also deemed acceptable by virtue of the wider key planning benefits that the proposal will deliver including (not exhaustive):

- The proposal's significant and valuable contribution to local housing supply in accordance with strategic objectives;

- Policy compliant affordable housing provision, with the potential for this to be increased should grant funding be awarded;
- The provision of family sized units to meet identified local housing need;
- Provision of affordable work space (promotion of local job creation and additional economic spin offs);
- Physical regeneration (specifically high quality design);
- Comprehensive landscaping strategy, improved links/access to the Green Belt and the promotion of environmental improvements; and
- Improvement to the transport network and public transport accessibility (i.e. bus contributions).

#### Landscaping and screening

The proposal is supported by a comprehensive Landscape Masterplan that is based upon 4 prevailing character areas and their relationship within the site and connection to the adjacent Local Centre and Green Belt edge. The character areas include the 'Gateway', 'Urban Square', 'Green Core' and 'Residential Street', which provide a mixture of soft and hard landscaped public and way-finding spaces totalling 13,176 sq m of publicly accessible amenity space that has been spread throughout the proposed development. In addition, the proposal will deliver a variety of informal and formal play opportunities within an area of 2,077sq m in excess of policy requirements.

A comprehensive strategy for shrub and tree planting, street furniture and surfacing materials is also included as part of the strategy and is considered to accord with planning policy objectives.

As presented within the landscape section of the Design and Access Statement and within the amendments document, the 97 existing trees identified for removal will be replaced at a ratio above 2:1, with 207 trees that are of a species suitable for the type of land use that is being promoted by the Council. The Applicant is also committing to replace trees with advanced and semi-mature stock that will quickly develop into established and attractive specimens.

The level of proposed amenity space, associated landscaping, on-site play space and tree planting therefore aligns with policy objectives.

#### Green Belt

The proposed development is not situated in the Green Belt and constitutes previously developed land. In this regard, the proposed development will improve the way in which the land meets the 'purposes' identified in the NPPF by reducing the spread of built development on land safeguarded as Green Belt, and by rationalising the development area. Furthermore, the proposed development will preserve the setting of the Green Belt through the use of sympathetic materials that will assist in minimising any perceived visual impact or sense of encroachment. This, coupled with measures to improve the parcel of Green Belt land immediately adjacent to the site and the planning benefits borne of the development itself, is considered to outweigh any perceived impact to the openness of the Green Belt.

Whilst it is concluded that the proposal would be visible from some open spaces (including the adjacent Green Belt), where conspicuous the level of impact would not be adverse and the quality and function of open space would not be diminished by the visibility of taller buildings at the edge of the urban centre. In this regard, although the proposal will be visible from the Green Belt, it is sited and will be delivered in the defined 'Developed Area' (as identified by relevant policy) and would not be inappropriate.

The application proposal has been designed with particular attention to the adjacent Green Belt. The blocks are stepped in height away from the Green Belt so as to not over-impose on the adjacent land, and following advice received from the LPA, the location, position and scale of development has been carefully considered to minimise impact to the Green Belt. The tallest buildings are those situated closest to the North Hillingdon Local Centre and Long Lane/the A40/Hillingdon London Underground station, which are located away from the Green Belt and will be shielded by other buildings and landscaping. The proposed landscaped approach and appearance of buildings all seek to reinforce the open nature of the adjacent land, whilst simultaneously promoting connections to, and use of this space alongside connections to the North Hillingdon Local Centre.

In this regard the proposal is considered acceptable having due consideration to the adjacent Green Belt and its setting.

As reported in the Townscape & Visual Impact Assessment, updated to align with the November 2018 scheme and submitted ahead of the Planning Committee Meeting on 19<sup>th</sup> February 2019:

- Visual amenity is not a purpose of the Green Belt.
- The NPPF states that *"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."* The site does not lie within the Green Belt and so the proposals would not alter its permanence, sense of openness or the fundamental aim of preventing urban sprawl.
- The designation of Green Belt does not reflect nor represent the quality or character of the landscape. To consider these aspects, the TVIA has assessed the likely impact / effect of the proposals on the character of the landscape as described in published National, Regional and Local Character Assessments.

#### Skyline & Views

- There would be glimpsed views of the development from public rights of way (PRoW) and Public Open Space (POS) within the surrounding rural landscape. However, aside from areas adjacent to highways, there are few within 1km of the Site and most are largely screened or heavily filtered by intervening vegetation. Views from PRoW and POS beyond 1km of the Site are already influenced by the existing settlement and / or transport infrastructure, or views of development would be largely constrained by topography, vegetation and built form, therefore the impact of development would be negligible.

	<ul style="list-style-type: none"> <li>• The development would contribute to the skyline of the Local Centre and nearby residential areas. However, given the character of the existing townscape, the development is considered to be of a suitable scale to provide a positive backdrop within the townscape, albeit only to a minor extent.</li> <li>• There would be negative influences on the skyline immediately to the north of the A40, as noted in the TVIA. However, these would be constrained by the settlement edge.</li> <li>• Impacts on the skyline from the Green Belt are not relevant to the TVIA, unless they are publicly accessible.</li> </ul> <p><u>Other</u></p> <ul style="list-style-type: none"> <li>• It is noted that non-compliance to Policy OL3 of the saved UDP is referenced as part of the reason for refusal on design grounds, but this policy was not 'saved' in 2012 and should therefore be disregarded.</li> <li>• The officer's report confirms that the proposal will not result in the loss of residential amenity as set out at paragraph 7.08 which states <i>"It is not therefore considered that the proposal would result in an over dominant form of development which would detract from the amenities of neighbouring occupiers, in compliance with policy BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)"</i>. Reference to Policy BE21 as part of the reason for refusal should therefore be disregarded.</li> <li>• Similarly, reference is made to non-compliance to Policy EM2. However, given the application site is not located within the Green Belt, this policy is not considered to be directly relevant to the site.</li> </ul>
<p><b>Parking</b></p> <p>Car parking provision is insufficient to address the demands of the proposed development in this locality given the site's low public transport accessibility, contrary to Policy AM14 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policy DMT 6 and the Council's Parking Standards.</p>	<p>The Transport Assessment report details why the proposed parking ratio of 0.5 bays per unit, which is supported by TfL, is considered appropriate for the proposed development.</p> <p>While the Borough as a whole is characterised by high levels of car ownership - a point made by the Highway Officer - if Census Data is analysed for the types of units proposed for the development (in terms of unit type, number of bedrooms and type of tenure) within the 3 wards immediately surrounding the site, it reveals a much lower existing level of car ownership that is commensurate with what is now proposed for the development (0.61 cars per unit – significantly lower than the 1 per unit that LB Hillingdon are requesting, and only slightly higher than the 0.5 ratio proposed).</p> <p>Once the proposed travel plan measures and the parking management strategy that is detailed in the Sustainable Travel and Car Park Management report are taken into account, a ratio of 0.5 spaces per dwelling is considered appropriate for the proposed development. The key travel plan measures include the provision of 4 car club bays within the development with 3 years' free membership for new residents, an on-site cycle 'superhub' and free Oyster Cards with £40 credit for new residents, all of which will reduce the requirement for private car ownership. The parking management plan includes a monitoring regime to assess changes in parking demand in surrounding neighbourhoods such that further mitigation can be considered and introduced as required.</p>

	<p>The Committee Report states that car parking provision is insufficient given the site's low public transport accessibility; and yet, the Highway Officer later states that '[the] level of public transport accessibility is not fully reflected within the public transport accessibility level (PTAL) rating for the site which equates to 3 and is therefore officially considered as moderate...' He acknowledges that the site is located immediately adjacent to an LUL station and is served by a number of local (and regional) bus services. This suggests (as is stated in the Transport Assessment report) that the site is, in fact, highly accessible to public transport services, despite its modest PTAL score.</p> <p>The report also states that a higher parking provision should be made as it would assist in 'limiting undue and detrimental parking displacement onto the local highway network'. This risk has been addressed through (a) the introduction of a parking management plan for the scheme (as set out in the Sustainable Travel and Car Park Management report), which will include a CPZ operating across the site to prevent informal or illegal on-street parking, (b) the fact that parking in the surrounding neighbourhoods is already controlled by existing CPZs, thereby preventing new residents from parking beyond the site boundaries and (c) the monitoring regime that has been agreed for 2 years following first occupation of the development to understand any changes in parking demand in the surrounding areas and a pot of money to introduce further mitigation if required.</p> <p>Finally, as is also detailed in the Transport Assessment report, a 2012 report by TfL shows a clear relationship between parking provision and car ownership levels in London residential developments. This report demonstrates that, where parking is not made available for prospective residents of new developments, it will attract people who do not require a car. Indeed, this in turn will mean that car travel will subsequently be lower at the development (thereby impacting on vehicle trip rates).</p> <p>For these reasons, the 0.5 parking ratio is appropriate for the proposed development, which has appropriately been supported by TfL.</p> <p>Please also refer to the accompanying standalone technical rebuttal prepared by WSP in response to internal officer comments received on 04/02/20019.</p>
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<p><b>Traffic</b></p> <p>In the absence of detailed flood risk assessment and drainage report, the application has failed to address the issues relating to flood risk and has failed to demonstrate that this development incorporates sustainable drainage techniques and reduce the risk of flooding. The proposal is therefore contrary to Policy EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies OE7 and OE8 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policy DMEI, Policies 5.12 and 5.13 of The London Plan (2016), the National Planning Policy Framework (2018) and the Planning Practice Guidance (March 2014).</p>	<p>The Committee Report comments on the following key considerations with regards to the traffic impact of the proposed development:</p> <ul style="list-style-type: none"> <li>• The use of TEMPRO traffic growth factors, even though new baseline traffic survey data was collected in 2017 for use in the traffic impact assessment work</li> <li>• Additional information on HS2 construction that has been made available since the traffic impact assessment work was undertaken, and which suggests a further 50-100 vehicle movements would pass through the Hillingdon Circus junction each day</li> <li>• Vehicle trip generation, and the suggestion that this has been underestimated</li> <li>• The fact that Hillingdon Circus junction is already operating close to, at or even over capacity during the AM and PM peak hours, meaning any increase in traffic through the junction at these times would exacerbate existing levels of congestion unless highway mitigation can be achieved</li> </ul> <p>Regarding the traffic flow survey data, the survey dates were reviewed and agreed with TfL to ensure they represented a 'neutral' time on the road network. There is therefore no reason to believe the data collected in 2017 is inaccurate or misrepresentative of typical existing traffic flows on the network. Rather, applying TEMPRO growth factors to 2010 survey data when the 2017 survey results clearly show no growth on the network would likely result in an overestimation of existing, baseline traffic flows.</p> <p>It is correct to state that the impact of the additional 50-100 trips associated with the HS2 construction works (which was not available during planning when the highway assessment work was undertaken) has not been assessed, but it should be noted that this is the total number of movements across an entire day, meaning additional hourly trips would be insignificant. It should also be noted that a Construction Management Plan will be required for the HS2 construction works, which will include restrictions on the timing of construction vehicle trips in order to minimise their impact on the road network. The impact of these additional trips on the operation of the junction would therefore be insignificant and temporary.</p> <p>Regarding the vehicle trip generation forecasts, it should be noted that the trip rates were reviewed in detail and agreed with TfL (and shared with LB Hillingdon). As stated above, there is a close relationship between parking provision and resultant vehicle trip generation at residential developments. The trip rates used within the submitted assessment were based on survey sites that shared the same transport characteristics as the proposed development in terms of number of units, accessibility to public transport services, and parking provision. There is therefore no reason to believe the vehicle trip generation forecasts associated with the proposed development have been underestimated, and no evidence has been provided in the Committee Report to support this statement.</p> <p>In terms of the impact of the proposed development on Hillingdon Circus, traffic impacts were assessed using industry standard traffic modelling packages LinSig and VISSIM. Models were developed, reviewed by TfL and</p>
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accepted as fit-for-purpose for the assessment of Proposed Development traffic impacts. Traffic surveys and modelling of the 2017 Base year confirmed that the network is congested during peak times, in particular around the Hillingdon Circus junction. In the AM peak the southbound approach runs very close to capacity, as does the Freezeland Way (left and ahead) and Western Avenue (right). Traffic conditions in the PM peak are better than the AM, although the Freezeland Way (left) and Western Avenue (right) still operate close to capacity.

The Proposed Development is forecast to generate an additional 106 and 100 vehicle trips through Hillingdon Circus junction during the AM and PM peak hours respectively, equating to between one and two additional vehicles passing through the junction every minute. Overall this represents a 3% increase in peak hour traffic, which is insignificant.

Taking the proposed highway scheme into account, and with some minor signal timing optimisation, the LinSig and VISSIM modelling forecasts that the incremental impact of the Proposed Development on the Baseline situation (with no Committed Development) is minor with small increases in degree of saturation (DoS) and queues at Hillingdon Circus.

In some cases, these increases in DoS are on approaches which are already close to capacity, however LinSig predicts only modest increases in queue lengths (up to 3 vehicles). The impact of the Proposed Development on journey times is also forecast to be minor. Buses were forecast to be largely unaffected, with up to 7 seconds increase in journey time. General traffic journey times along the A437 Long Lane corridor at peak times were forecast to increase by up to 38 seconds during the morning peak. Journey times in the PM peak are almost unchanged.

The Proposed Development impact was also quantified in the context of the Committed Development expected to come forward. With Committed Development (no Proposed Development) the Hillingdon Circus junction is forecast to operate over capacity in the AM peak on the A437 Long Lane north right turn and Freezeland Way left turn. The addition of Proposed Development was forecast to increase the DoS on the Freezeland Way left turn by 7%, but showed very small impact on other approaches. The model forecast a moderate increase in queue on Freezeland Way of 7 PCUs. The impact of the Proposed Development was small in the PM peak. The inclusion of the office development flows in the Committed Development resulted in higher DoS and queue values, but the impact of the Proposed Development was the same as without the office.

Against the Committed Development base, the impact of the Proposed Development on journey times was also forecast to be small. Buses were forecast to be largely unaffected, with up to 6 seconds increase in journey time. General traffic journey times along the A437 Long Lane corridor at peak times were forecast to increase by up to 43 seconds (+14%) during the morning peak. Journey times in the PM peak are almost unchanged. When the office development is included within the Committed Development flows the journey time impact of the Proposed Development is within that reported above for the without development scenario.



	<p>It should be noted that the VISSIM model does not take into account changes to journey routing (trip reassignment) of existing traffic flows, or peak spreading, whereby drivers choose to travel at alternative times to avoid the busiest times on the road network. Once this is taken into account, the queue lengths observed in the future model scenarios could be expected to reduce. It should also be stressed that these are the maximum queue lengths that can be expected during the peak periods, and that for the majority of time the queue lengths would be shorter.</p> <p>Following discussions with TfL, further traffic impact assessment work was undertaken in early 2018 which considered further optimisation of the traffic signal timings at Hillingdon Circus. This demonstrated that, by optimising (i.e. re-balancing) traffic signal timings at the junction, results show that there is scope to prioritise certain traffic movements to meet the traffic management objectives of TfL and LB Hillingdon. The most notable potential gain is on the A437 Long Lane, which could yield significant journey time savings to general traffic and buses.</p> <p>The above demonstrates that (a) significant traffic impact assessment work has been undertaken to understand the impact of the proposed development on the local road network (which TfL has reviewed in detail and approved), (b) the impact of the proposed development alone on the road network would be insignificant, and (c) highway mitigation and highway gain can be achieved through optimisation of the signal timings, even taking into account the cumulative impact of the proposed development and committed development. We therefore contest that the proposed development would 'impose unreasonable traffic burden on the local road network'.</p> <p>Please also refer to the accompanying standalone technical rebuttal prepared by WSP in response to internal officer comments received on 04/02/20019.</p>
<p><b>Access</b></p> <p>The proposed development by reason of its design, form and layout would fail to provide adequate access for future occupiers, particularly to the communal podium gardens and play areas, contrary to Policy BE1 of the Local Plan Part 1 - Strategic Policies (2012), emerging Local Plan Part 2 Development Management Policy DMHB 16, London Plan policies 3.1, 3.5 and 7.2 and the design principles contained within the adopted Hillingdon Design and Access Statements (HDAS): Residential Layouts and Accessible Hillingdon.</p>	<p>The design of the podium access step and ramps has been well considered and complies with relevant design guidance. A balance has been struck between keeping the layout as compact as possible to maximise the provision of public open space and ensuring ramps do not exceed gradients of 1:20 to maximise their accessibility and avoid excessive provision of landings or excessively long ramps. The design of the steps and ramps at both ends of the podium will be further developed during detailed design to include handrails and balustrades that will address any potential safety concerns.</p> <p>The podium level landscape sits above semi-basement parking, which reduces vehicular movement and parking from the streets, making this environment more preferable for pedestrians. The podium itself can be accessed by residents and their visitors via both the stepped and ramped features and via internal lifts located within each building core, providing multiple choices for how this space is used and accessed.</p> <p>Please also refer to the accompanying standalone technical note prepared by Collado Collins in response to the Access Officer's comments received on 04/02/2019.</p>

<p><b>Flood</b></p> <p>In the absence of detailed flood risk assessment and drainage report, the application has failed to address the issues relating to flood risk and has failed to demonstrate that this development incorporates sustainable drainage techniques and reduce the risk of flooding. The proposal is therefore contrary to Policy EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies OE7 and OE8 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policy DME1, Policies 5.12 and 5.13 of The London Plan (2016), the National Planning Policy Framework (2018) and the Planning Practice Guidance (March 2014).</p>	<p>The officer's comments suggest that they would like additional survey work to be undertaken to ensure the sewer the proposal identifies for connection is in suitable condition and that there are no other sewers that might be lower than the existing connection point to be used.</p> <p>The comments raised can be technically resolved by the completion of additional survey work, which would reveal the condition of the existing sewer to allow Thames Water to undertake the appropriate work if there is an issue with the condition.</p> <p>If an additional sewer at a lower level is identified, the proposal could discharge into this, should Thames Water agree to this approach. Should this not be acceptable, the proposal would maintain the current proposal (as previously agreed).</p> <p>It is noted that the comments provided ignore the reduced run off rate that is provided.</p> <p>Furthermore, it is disappointing that after 6 months of consultation, some of the points raised by LBH have appeared for the first time. We have already received informal, pre-application approval from LBH Flood Officer (Adam Littler) having agreed overall principles, discharge rates and undertaken detailed on-site network analysis.</p> <p>If LBH parameters are now changing, then we need specific requirements to be agreed as soon as possible.</p> <p>To clarify the current position, we summarise thus:</p> <ul style="list-style-type: none"> <li>• The Applicant does not have control over, or right to influence SuDS implementation outside the application boundary, where ownership is by others. Therefore, the SWMP is constrained to within the site boundary, where deliverability and maintenance can be assured.</li> <li>• The proposed point of connection to the public sewer replicates the previous surface water drainage system for the site, albeit now at a maximum discharge rates of 12.1 l/s, which has been agreed as the appropriate equivalent greenfield run-off rate. We understood from previous consultation that this was considered to be an appropriate strategy. Public sewer network capacity and connectivity has never previously been raised as a constraint or concern by LBH or Thames Water.</li> <li>• The use of Permeable Paving as a SuDS measure has been excluded from calculation of the size of attenuation tank, due to the relatively low permeability of the ground and high groundwater level, making infiltration rates low and unpredictable. The size of the tank storage is therefore safe in terms of flood mitigation, whilst the use of permeable paving will still provide the benefits of mimicking natural infiltration during low rainfall events and capture of pollutants.</li> <li>• Whilst green roofs and soft landscaping are utilized where under the control of the landlord managed areas, we do not consider rain gardens under the control of tenure blind residential properties to be reliable enough to justify reduction in attenuation volume calculation. Living roofs are not appropriate due</li> </ul>
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	<p>to concerns of increased bird population in the flight path of Northolt Airfield. The overall landscape design and provision of amenity space is covered by the wider consideration of architecture and landscaping, and subject to separate consultation. Maximizing green space within the constraints of building footprint and car parking provision has been a priority for aesthetic and ecological benefit as well as SuDS. We have coordinated areas where this is appropriate to the drainage design.</p> <ul style="list-style-type: none"> <li>• Rainwater harvesting represents a sustainable use of rainwater and could be included within the landscape maintenance strategy, but we have not included it within attenuation calculation because there is no guarantee that the tanks would not already be full when the attenuation volume is required. Management of the tanks just means preventing tanks from filling. This volume is more efficiently provided as part of the main attenuation storage, rather than splitting the tanks and control systems.</li> <li>• Use of a Blue Roof system was considered as a means of providing part of the attenuation volume and there is the potential for this providing some discharge under gravity. It has previously been omitted, on the basis that pumped storage would still be required for lower level parts of the site and the proposed design provides robust mitigation against flood risk. We could revisit this option if LBH prefer.</li> </ul>
<p><b>Energy</b></p> <p>The development fails to satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions on site, contrary to policy EM1 of the Local Plan Part 1 - Strategic Policies (2012), emerging Local Plan Part 2 Development Management Policies DME1 and DMEI 2, Policies 5.2, 5.13 and 5.15 of the London Plan, and the NPPF (2018).</p>	<p>It is common that developments do not achieve zero carbon, the minimum requirement is for residential developments to achieve a 35% carbon reduction, the Hillingdon development has exceeded the minimum requirement by achieving a circa 45% carbon saving. The financial contribution requirement to offset the remaining carbon which is common practice has been agreed and calculated as follows.</p> <p><u>Off-site Contribution</u></p> <p>The off-site contribution needs to be secured through the S106 as a 'carbon offset fund'. The total is:</p> <p>Shortfall (tCO<sub>2</sub>) x Cost per carbon tonne (£) x 30 (years)</p> <p>176.26 x 60 x 30</p> <p>£317,268.</p> <p>This requirement is usually set within the S106 agreement and further details on the plant equipment to be utilised normally forms part of the conditions of approval (as this detail is developed during detailed design stage, RIBA Stages 3 / 4).</p> <p>It should be noted that the Applicant has confirmed its acceptance of the suggested contribution identified (£317,268).</p>
<p><b>Trees</b></p> <p>The development fails to retain and utilise landscape features of merit (high value trees), which could selectively have been retained</p>	<p>Previously consented applications at this site have included the removal of the majority of trees located within the red line boundary, which is a precedent that this application has followed. This level of tree removal has been a core part of these proposals since the earliest stages of Pre-Application consultation with the London Borough of Hillingdon and it has never once been raised as an issue or identified as a likely reason for refusal.</p>

<p>and incorporated within the new built environment. This is contrary to policy BE1 of the Local Plan Part 1 - Strategic Policies (2012), emerging Part 2 Development Management Policy DMHB 14 and Policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).</p>	<p>Notwithstanding the above, whilst a number of trees identified for removal are of Grade B classification, a lot of these are species that are not appropriate for residential developments such as Poplar (high water demand and extensive rooting area), Alder (high water demand) and Ash (prone to die-back and prohibited from being planted). There has been little or no management of trees on site for many years and these have not developed into specimens that would be attractive individually if retained.</p> <p>Where possible, we have retained some existing trees and have ensured that the development is at a suitable distance from the boundary to ensure that boundary trees can be retained where possible. This includes the majority of trees along the southern boundary adjacent to the Council Land.</p> <p>As mentioned within the landscape section of the Design and Access Statement and within the amendments document, the 97 existing trees identified for removal will be replaced at a ratio above 2:1, with 207 trees that are of a species suitable for the type of land use that is being promoted by LBH. The applicant is committing to replace trees with advanced and semi-mature stock that will quickly develop into large and attractive specimens.</p>
<p><b>Noise</b></p> <p>In the absence of a comprehensive noise report, the applicant has failed to demonstrate that the proposed residential units can be sited, designed, insulated or otherwise protected from external noise sources to appropriate national and local standards. The proposal is therefore contrary to Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policies OE1 and OE3 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).</p>	<p>Based upon comments received from LB Hillingdon on 4 February 2019, where it was identified that there was a discrepancy in the mitigation data presented, an amended report (<b>Acoustic Assessment - NDT5380/17025/Rev. 5</b>) has been submitted to the LPA which corrects this error (as discussed with the Environmental Health Officer) and sets out a detailed mitigation strategy that would ensure all noise levels would meet BS8233/WHO standards.</p> <p>The building forms, sizes, and locations are precisely designed to mitigate the noise from external sources. This is achieved by arranging a series of buildings along the west (Long Lane) and north (A40) edges of the site, which will block traffic noise and improve environmental comfort where most of the external amenity has been located. As stated in the Design and Access Statement, those building facades exposed to external noise sources will be robustly detailed. No external balconies have been proposed on facades where simulated noise levels exceed the BS8233 upper guideline of 55 dB LAeq,T. Nevertheless, further mitigation is provided in line with the Government's Planning Practice Guidance (DCLG 06/03/2014) by giving residents access to 'a relatively quiet, protected, external publicly accessible amenity space (e.g. a public park or a local green space designated because of its tranquillity) that is nearby (e.g. within a 5 minutes walking distance)' – i.e. the play areas in the courtyards and the podium landscape.</p>
<p><b>Refuse</b></p> <p>The proposed development fails to provide adequate refuse and recycling facilities for the residential element of the scheme, contrary to Policy EM11 of the Local Plan Part 1 (2012) and Policy 5.16 'Waste Net Self Sufficiency' of the London Plan (2016).</p>	<p>Comments received from LBH Officers (dated 4 February 2019) state that <i>'If 1280 litre wheeled bins are used then there will be adequate capacity for the storage of waste and recycling on the site as a whole.'</i></p> <p>The proposed bin stores have been designed for 1280 litre wheeled bins. It should be noted that adequate capacity is being proposed for the development as a whole. However, additional capacity may be provided for buildings 1, 4, and 6 individually as part of the detailed design process via a minor internal adjustment, following determination of the application, as required.</p>

	Please also refer to the accompanying standalone technical note prepared by Collado Collins in response to internal Officer's comments received on 04/02/2019.
<p><b>Planning Obligations</b></p> <p>The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Off site Highways Works, Public Transport, Travel Plans, Construction Training, Ecological Mitigation, Affordable Housing, Air Quality and Project Management and Monitoring). The scheme therefore conflicts with adopted policies T1, T2, E7, EM7, EM8 and H2 of the Local Plan Part 1 - Strategic Policies (2012), Saved policies AM15, AM2, AM7, OE78, OE7, BE38, EC2, EC3, EC5, EC6 and R17 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), emerging Local Plan Part 2 Development Management Policies DMH 7, DMEI 7, DMEI 14, DMCI 3, DMCI 7, DMT 1, DMT 2, DMT 4 and DMT 5; Policies 3.11, 3.12, 3.13, 6.2, 6.4, 7.1, 7.19 and 8.2 of the London Plan (2016), the adopted Supplementary Planning Document 'Planning Obligations; emerging Policy SA 14 'Master Brewer and Hillingdon Circus' of the Local Plan: Part Two Site Allocations and Designations and the NPPF (2018).</p>	<p>The Applicant has provided commentary on the proposed Section 106 Heads of Terms and identified points of agreement and points of further negotiation as set out in email correspondence to Mandip Malhotra on 11/01/19 as summarised below (in red):</p> <p><i>"The Council's Section 106 Officer has reviewed the proposal, as have other internal and statutory consultees, including the Greater London Authority and Transport for London. The comments received indicate the need for the following contributions or planning obligations to mitigate the impacts of the development. If the application were to be considered for approval, the following broad S106 Heads of Terms would be pursued by the Council:</i></p> <p><i>(i). Transport: A s278 and/or s38 agreement will be entered into to address any and all on site and off site highways works as a result of this proposal. These include the following:</i></p> <ul style="list-style-type: none"> <li><i>• Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities,</i></li> <li><i>• Improved pedestrian and cycling facilities throughout the signalled junction.</i></li> <li><i>• Potential improvements to the service road approach in Freezeland Way (fronting the site).</i></li> <li><i>• The creation of a new public realm 'Gateway' fronting the site on Freezeland Way.</i></li> <li><i>• Enhanced bus stop provisions for the 'Oxford Tube' bus service,</i></li> <li><i>• Monitoring of signal optimisation @ Hillingdon Circus,</i></li> <li><i>• Contingency monies to remedy any parking displacement onto the public highway (£20,000),</i></li> <li><i>• Review of local public lighting, road signage and marking provisions,</i></li> <li><i>• Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable.</i></li> <li><i>• Implementation of vehicle actuated speed signs (up to a cost of £5,000). These items have been discussed and are agreed.</i></li> </ul> <p><i>(ii). Public Transport Infrastructure: A 5 year public transport contribution toward a new bus service (£375,000); Bus priority measures (£30,000), This item has been discussed and agreed.</i></p> <p><i>(iii). Travel Plan initiatives/incentives with a financial performance bond (£20,000), This item is agreed</i></p> <p><i>(iv). Affordable Housing: Either 153 units (35%) as affordable housing, comprising 10 units in as Shared Ownership (41%) 90 units as London Affordable Rent (59%) or 174 units (40%) as affordable housing, (assuming grant funding of £28,000 per unit is available), comprising 68 units as Shared Ownership (39%) 106 units as London Affordable Rent (61%) – this item reflects the options presented (subject to grant) and is accepted.</i></p> <p><i>(v). None of the market housing will be occupied until 100% of the affordable housing is delivered. – this item is NOT accepted. We have included some suggested wording below:</i></p> <p><i>Provision of affordable housing comprising units (habitable rooms) in affordable rent tenure and units (with habitable rooms) in Shared Ownership tenure provided through a Registered Provider. The affordable housing shall be ready for occupation prior to the occupation of no more than 75% of the private sale units on a Phase</i></p>

*basis. The Registered Provider shall be required to comply with the Council's Deed of Nomination Rights in respect of the affordable tenure units.*

*(vi). Construction Training: either a construction training scheme delivered during the construction phase of the development or a financial contribution secured equal to the formula as contained in the SPD (£2,500 for every £1m build cost + (total gross floor area/7,200m<sup>2</sup> x £71,675) = total contribution). This is agreed.*

*(vii). Landscape Screening and Ecological Mitigation: a financial contribution in the sum of at least £252,308.88. As previously indicated this item is NOT accepted. The sum identified has not been discussed and does not relate to the current proposal. Furthermore, it does not account for the third party land constraints that exist to the east of the site boundary (within the Green Belt) and are therefore not within the Applicant's control. The provision of mitigation is identified in the Ecology Report but the scope of the proposed mitigation will require discussions and agreement. As previously suggested, the Applicant is prepared to discuss this but cannot accept the costs derived from a separate proposal.*

*(viii). Air Quality: a financial contribution in the sum of £25,000.(to be further reviewed in light of amendments to the on site parking provision) – an updated contribution of £247,906 has been identified and is NOT accepted. Confirmation of the methodology used to arrive at this figure should be shared with the Applicant (identified as provided within the comments issued).*

*(ix). Carbon Fund: a contribution of £317,268 for a carbon fund to make up for the shortfall for this development and to make it policy compliant – this has been discussed and is agreed.*

*(x). Project Management and Monitoring Fee: a contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement. This is agreed.*

*Contributions towards education, health, libraries and community facilities are now covered by the Hillingdon Community Infrastructure Levy. – noted.*

The applicant has so far agreed in principle to the following proposed Heads of Terms.

- o Affordable Housing – agreed, as per the options presented.*
- o Site Specific Transport Works (including Travel Plan) - agreed*
- o Air Quality Improvements – NOT agreed (see comments above)*
- o Employment and Training Provision – agreed (in line with the comments above)*
- o Ecological Mitigation – NOT agreed (see comments above)*
- o Contribution towards improvements to adjacent Green Belt land" NOT agreed (see comments above)*

The Applicant remains committed to agreeing appropriate Heads of Terms with the Determining Authority.

18 February 2019

[REDACTED]

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**From:** [REDACTED]@glhearn.com>  
**Sent:** 19 February 2019 13:48  
**To:** [REDACTED]  
**Cc:** [REDACTED]@meyerhomes.com)  
**Subject:** RE: RE: GLA 0995f - Master Brewer Hillingdon  
**Attachments:** 190219\_Transport Response.pdf

[REDACTED],  
In addition to the information shared yesterday pursuant to the above-mentioned application, please also find enclosed a technical response prepared in relation to the comments raised by LB Hillingdon's Highways officer.  
Kind regards

[REDACTED]  
[REDACTED]  
Planning Associate Director

GL Hearn Limited  
65 Gresham Street  
London EC2V 7NQ

[REDACTED]  
glhearn.com

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**From:** [REDACTED]  
**Sent:** 18 February 2019 18:50  
**To:** [REDACTED]  
**Cc:** [REDACTED]@meyerhomes.com)  
**Subject:** RE: GLA 0995f - Master Brewer Hillingdon  
**Importance:** High

[REDACTED]  
As promised, please find enclosed a copy of LB Hillingdon's committee report pursuant to the above-mentioned proposal, which recommends the application for refusal.

We have considered the report and prepared a schedule of summary responses in relation to the reasons for refusal identified (attached).

In addition, technical responses to internal officer representations (which were received on 4 February 2019) have been prepared and circulated to LB Hillingdon for consideration. A copy of this information is enclosed for your records – <https://we.tl/t-tbncLiBG0> (responses to internal officer comments) / <https://we.tl/t-3l9fVbOOUb> (technical updates to Acoustic Assessment/TVIA/Travel Plan). Officers of LB Hillingdon have confirmed that they will not consider any additional responses submitted in relation to the application and therefore, this information is submitted to inform future discussions pursuant to the proposal with the GLA and/or an Inspector.

I trust that this is helpful. Please let me know if you have any questions or would like to discuss.

Kind regards



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## FORMER MASTER BREWER SITE, FREEZELAND WAY, HILLINGDON

### Response to LB Hillingdon Highway Officer comments contained in the Planning Committee Report

#### INTRODUCTION

This document provides a response to the Highway Officer comments contained in the Planning Committee report prepared by the London Borough of Hillingdon in January 2019 with regards to the Former Master Brewer Site planning application 4266/APP/2017/3183.

For each of the key transport-related topics addressed in the report, a summary of the comments is provided in blue followed by the applicant's response in black.

#### RESPONSE TO COMMENTS

##### 1. PARKING PROVISIONS – C3 RESIDENTIAL

LBH request a minimum parking ratio of 1 space per unit based upon the adopted UDP and state that they do not support the proposed ratio of 0.5 spaces per unit.

LBH refer to Census Data and state that LB Hillingdon has one of the highest car ownership rates in London as justification for a higher parking ratio.

LBH express concern that the parking ratio would result in detrimental parking displacement onto the highway network.

The Transport Assessment report details why the proposed parking ratio of 0.5 bays per unit, which is supported by TfL, is considered appropriate for the proposed development.

While the Borough as a whole is characterised by high levels of car ownership - a point highlighted by the Highway Officer - if Census Data is analysed for the types of units proposed for the development (in terms of unit type, number of bedrooms and type of tenure) within the 3 wards immediately surrounding the site (Uxbridge North, Ickenham and Hillingdon East), it reveals a much lower existing level of car ownership that is commensurate with what is now proposed for the development (0.61 cars per unit – significantly lower than the 1 per unit that LB Hillingdon are requesting, and only slightly higher than the 0.5 ratio proposed).

Once the proposed Travel Plan measures and the parking management strategy that is detailed in the Sustainable Travel and Car Park Management report are taken into account, a ratio of 0.5 spaces per dwelling is considered appropriate for the proposed development. The key Travel Plan measures include the provision of 4 car club bays within the development with 3 years' free membership for new residents, an on-site cycle 'superhub' and free Oyster Cards with £40 credit for new residents, all of which will reduce the requirement for private car ownership. The parking management plan includes a monitoring regime to assess changes in parking demand in surrounding neighbourhoods such that further mitigation can be considered and introduced as required.

The Committee Report states that car parking provision is insufficient given the site's low public transport accessibility; and yet, the Highway Officer later states that *'[the] level of public transport accessibility is not fully reflected within the public transport accessibility level (PTAL) rating for the site which equates to 3 and is therefore officially considered as moderate...'* He acknowledges that the site is located immediately adjacent to an LUL station and is served by a number of local (and regional) bus services. This suggests (as is stated in the Transport Assessment report) that the site is, in fact, highly accessible to public transport services, despite its modest PTAL score.

The report also states that a higher parking provision should be made as it would assist in *'limiting undue and detrimental parking displacement onto the local highway network'*. This risk has been addressed through (a) the introduction of a parking management plan for the scheme (as set out in the Sustainable Travel and Car Park Management report), which will include a CPZ operating across the site to prevent informal or illegal on-street parking,

(b) the fact that parking in the surrounding neighbourhoods is already controlled by existing CPZs, thereby preventing new residents from parking beyond the site boundaries, and (c) the monitoring regime that has been agreed for 2 years following first occupation of the development to understand any changes in parking demand in the surrounding areas and a pot of money to introduce further mitigation if required.

Finally, as is also detailed in the Transport Assessment report, a 2012 report by TfL shows a clear relationship between parking provision and car ownership levels in London residential developments. This report demonstrates that, where parking is not made available for prospective residents of new developments, it will attract people who do not require a car. Indeed, this in turn will mean that car travel will subsequently be lower at the development (thereby impacting on vehicle trip rates).

For these reasons, the 0.5 parking ratio is appropriate for the proposed development, which has appropriately been supported by TfL.

## 2. CAR CLUB FACILITY

LBH welcome the use of a car club facility at the development.

The car club proposals, which comprise 4 car club parking bays and 3 years' free membership for each dwelling upon first occupation, is proposed as part of the package of sustainable travel measures. If a ratio of 1 parking bay per unit were to be implemented, as is proposed by LB Hillingdon, providing a car club on the site is unlikely to be commercially viable.

The car club facility acts as a buffer for residents who don't typically need to own a car but may prefer to use one occasionally. Implementing this facility will alleviate demand for private car ownership and thus supports the proposed parking ratio of 0.5 bays per unit.

## 3. ELECTRIC VEHICLE CHARGING POINTS

LBH consider the arrangement relating to quantum of EV charging points to be acceptable.

We welcome LBH's comments on this matter.

## 4. DISABLED PARKING

LBH consider the high proportion of blue badge spaces to be acceptable.

We welcome LBH's comments on this matter.

## 5. CYCLE PARKING

LBH consider the quantity of cycle parking spaces to be excessive and believe a reversion toward the saved UDP standard would be considered more prudent.

Proposed cycle parking provision at the development is in line with the Draft London Plan standards, which have been generated using an evidence base that aims to increase the number of people cycling across London. This provision is supported by TfL. Providing cycle parking at this level aligns with national and regional policy, which seeks to encourage behavioural change in the way people travel away from private car use towards using more sustainable travel modes; indeed, the proposed cycle parking provision supports the package of sustainable travel measures and proposed car parking provision.

## 6. MOTORCYCLE / SCOOTER PARKING

Seven motorcycle spaces are provided at present, whilst LBH's UDP policy requires that 18 spaces be provided (1 space per 20 parking spaces). LBH request an uplift to 18 spaces.

The parking strategy for the proposed development detailed in the Transport Assessment does not make any provision for motorcycle / scooter parking, but we would be happy to incorporate this type of parking within the

development in line with LB Hillingdon's UDP policy, which requires 1 motorcycle / scooter parking bay per 20 car parking bays. Based on the proposed residential parking provision of 219 bays, this would require a total of 11 motorcycle / scooter parking bays.

## **7. PARKING PROVISIONS – A1/A3 RETAIL AND B1(A) EMPLOYMENT USE**

LBH note that, whilst the LBH saved UDP standard would recommend up to 11 spaces to serve the proposed retail and commercial uses, three spaces is considered acceptable as car borne demand for the retail use is predicted to be relatively low to non-existent.

We welcome LBH's comments on this matter; however, please note that 5 on-site parking bays are proposed in connection with the retail and employment uses, as is detailed in the Transport Assessment Addendum report (November 2018).

## **8. ELECTRIC VEHICLE CHARGING POINTS**

LBH note that providing only one of the three visitor spaces as an 'active' bay could restrict usage for non-electrified vehicles. LBH suggest that a planning condition could be applied to secure priority use of this bay for electric vehicles, but then recommend against the idea as it could not be enforced in practice.

As stated above, five bays will be provided rather than three. One of these will have active electric charging provision as per London Plan 2016 requirements (20%). We agree with the Council that the proposed planning condition would not be enforceable in practice, and should not therefore be pursued.

## **9. CYCLE PARKING (RETAIL / EMPLOYMENT USES)**

LBH consider the quantity of cycle parking spaces to be acceptable.

We welcome LBH's comments on this matter.

## **10. PARKING MANAGEMENT / ALLOCATION STRATEGY**

LBH state that a Parking Management Strategy would be secured by planning condition.

Noted. A Sustainable Travel and Car Parking Management Plan has been produced and submitted to the Council as part of the Planning Application. This provides details on how parking will be managed within and surrounding the site, and forms a key part of the justification for the proposed parking ratio of 0.5 bays per dwelling.

The car park management strategy will be further developed and submitted to the Council for approval prior to first occupation.

## 11. TRAFFIC IMPACT ASSESSMENT

### TRAFFIC GROWTH

LBH request that a TEMPRO growth factor be applied to the background traffic flows.

Traffic surveys were conducted in 2017, which showed that there had been a small reduction in traffic at the Hillingdon Circus junction since 2010. The survey dates were reviewed and agreed with TfL to ensure they represented a 'neutral' time on the road network. There is therefore no reason to believe the data collected in 2017 is inaccurate or misrepresentative of typical existing traffic flows on the network. Rather, applying TEMPRO growth factors to 2010 survey data when the 2017 survey results clearly show no growth on the network would likely result in an overestimation of existing, baseline traffic flows.

The baseline (existing) traffic modelling assessment work was validated and calibrated to ensure it accurately represented current traffic conditions at Hillingdon Circus in terms of queue lengths and journey times. This was reviewed in detail and approved by TfL before any future year scenarios were modelled.

It should also be noted that the modelling approach, including the agreement not to apply growth factors to the 2010 survey data, was discussed and agreed with both TfL and LB Hillingdon in early 2017 prior to the assessment work being undertaken.

### COMMITTED DEVELOPMENT

LBH acknowledge that three substantive development sites in the area have been assessed as part of the cumulative impact, whilst other lesser scale developments have been omitted due to their comparatively de-minimis predicted highway impacts.

Acknowledged.

### TRAFFIC MODELLING OUTCOMES

LBH states that, in traffic capacity terms, the current baseline scenario indicates that Hillingdon Circus signalised junction operates at and above capacity, both in the am and pm peaks thus creating undue traffic queuing and resultant congestion at the junction and surrounding road network. They continue that the proposal combined with the aforementioned committed developments would clearly exacerbate this position creating a scenario whereby the junction could potentially be inflicted with traffic levels well above operational capacity resulting in greater vehicle queue lengths and associated delays which understandably raises concern.

Later, a summary is provided, which states that 'unless highway mitigation and highway gain can be achieved, the proposed is considered unacceptable on traffic generation grounds'.

The summary conclusion then states that 'The Highway Authority is concerned that the proposal: ... ii) would impose added and unreasonable traffic burden on the local road network, namely the Hillingdon Circus signalised junction, which currently operates at and beyond workable capacity, contrary to policies AM14 and Am7 respectively of the Development Plan (2012)'.

In terms of the impact of the proposed development on Hillingdon Circus, traffic impacts were assessed using industry standard traffic modelling packages LinSig and VISSIM. Models were developed, reviewed by TfL and accepted as fit-for-purpose for the assessment of Proposed Development traffic impacts. Traffic surveys and modelling of the 2017 Base year confirmed that the network is congested during peak times, in particular around the Hillingdon Circus junction. In the AM peak the southbound approach runs very close to capacity, as does the Freezeland Way (left and ahead) and Western Avenue (right). Traffic conditions in the PM peak are better than the AM, although the Freezeland Way (left) and Western Avenue (right) still operate close to capacity.

The Proposed Development is forecast to generate an additional 106 and 100 vehicle trips through Hillingdon Circus junction during the AM and PM peak hours respectively, equating to between one and two additional vehicles passing through the junction every minute. Overall this represents a 3% increase in peak hour traffic, which is insignificant.

Taking the proposed highway scheme into account, and with some minor signal timing optimisation, the LinSig and VISSIM modelling forecasts that the incremental impact of the Proposed Development on the Baseline situation (with no Committed Development) is minor with small increases in degree of saturation (DoS) and queues at Hillingdon Circus.

In some cases, these increases in DoS are on approaches which are already close to capacity; however, LinSig predicts only modest increases in queue lengths (up to 3 vehicles). The impact of the Proposed Development on journey times is also forecast to be minor. Buses were forecast to be largely unaffected, with up to 7 seconds increase in journey time. General traffic journey times along the A437 Long Lane corridor at peak times were forecast to increase by up to 38 seconds during the morning peak. Journey times in the PM peak are almost unchanged.

The Proposed Development impact was also quantified in the context of the Committed Development expected to come forward. With Committed Development (no Proposed Development) the Hillingdon Circus junction is forecast to operate over capacity in the AM peak on the A437 Long Lane north right turn and Freezeland Way left turn. The addition of Proposed Development was forecast to increase the DoS on the Freezeland Way left turn by 7%, but showed very small impact on other approaches. The model forecast a moderate increase in queue on Freezeland Way of 7 PCUs. The impact of the Proposed Development was small in the PM peak. The inclusion of the office development flows in the Committed Development resulted in higher DoS and queue values, but the impact of the Proposed Development was the same as without the office.

Against the Committed Development base, the impact of the Proposed Development on journey times was also forecast to be small. Buses were forecast to be largely unaffected, with up to 6 seconds increase in journey time. General traffic journey times along the A437 Long Lane corridor at peak times were forecast to increase by up to 43 seconds (+14%) during the morning peak. Journey times in the PM peak are almost unchanged. When the office development is included within the Committed Development flows the journey time impact of the Proposed Development is within that reported above for the without development scenario.

It should be noted that the VISSIM model does not take into account changes to journey routing (trip reassignment) of existing traffic flows, or peak spreading, whereby drivers choose to travel at alternative times to avoid the busiest times on the road network. Once this is taken into account, the queue lengths observed in the future model scenarios could be expected to reduce. It should also be stressed that these are the maximum queue lengths that can be expected during the peak periods, and that for the majority of time the queue lengths would be shorter.

Following discussions with TfL, further traffic impact assessment work was undertaken in early 2018 which considered further optimisation of the traffic signal timings at Hillingdon Circus. This demonstrated that, by optimising (i.e. re-balancing) traffic signal timings at the junction, results show that there is scope to prioritise certain traffic movements to meet the traffic management objectives of TfL and LB Hillingdon. The most notable potential gain is on the A437 Long Lane, could yield significant journey time savings to general traffic and buses.

The above demonstrates that (a) significant traffic impact assessment work has been undertaken to understand the impact of the proposed development on the local road network (which TfL has reviewed in detail and approved), (b) the impact of the proposed development alone on the road network would be insignificant, and (c) highway mitigation and highway gain can be achieved through optimisation of the signal timings, even taking into account the cumulative impact of the proposed development and committed development. We therefore contest that the proposed development would 'impose unreasonable traffic burden on the local road network'.

[LBH also note that additional information on HS2 construction has been made available since the traffic impact assessment work was undertaken, which suggests a further 50-100 vehicle movements could pass through the Hillingdon Circus junction each day](#)

The impact of the additional 50-100 trips associated with the HS2 construction works (which was not available during planning when the highway assessment work was undertaken) has not been assessed, but it should be noted that this is the total number of movements across an entire day, meaning additional hourly trips would be insignificant.

It should also be noted that a Construction Management Plan will be required for the HS2 construction works (as requested by LB Hillingdon), which will be required to indicate measures to reduce the impact of construction traffic during the highway peak periods (0730-0930 and 1630-1830). Construction traffic trips will therefore be timed to take place outside the peak periods for traffic congestion at Hillingdon Circus. The impact of these additional trips on the operation of the junction would therefore be insignificant and temporary.

## VEHICULAR TRIP DISTRIBUTION

LBH accept the vehicular trip distribution to and from the development.

We welcome LBH's comments on this matter.

## 12. TRAFFIC GENERATION – C3 RESIDENTIAL / A1 RETAIL / B1 COMMERCIAL

LBH state that the applicant has underestimated both the AM and PM vehicle trip generation, and state that the residential activity for this scale of development is very likely to exceed 100 two-way vehicular movements.

It should be noted that the trip rates detailed in the Transport Assessment were reviewed by and agreed with TfL (and shared with LB Hillingdon). As stated above, there is a close relationship between parking provision and resultant vehicle trip generation at residential developments. The trip rates used within the submitted assessment were based on survey sites that shared the same transport characteristics as the proposed development in terms of number of units, accessibility to public transport services, and parking provision. There is therefore no reason to believe the vehicle trip generation forecasts associated with the proposed development have been underestimated, and no evidence has been provided in the Committee Report to support this statement.

## VEHICULAR TRIP GENERATION

LBH reiterate their belief that the applicant has underestimated the AM and PM peak vehicle trip generation. They go on to quote traffic assessment guidelines produced by the Chartered Institution of Highways and Transportation (CIHT) produced in 1994 (i.e. 25 years ago), which includes trip generation threshold triggers of 5% and 10% development traffic uplift for congested and other roads respectively to establish 'whether mitigation measures (if achievable) could enable a proposal to be acceptable on highway grounds if these percentages were exceeded'. The combined impact of the proposed and committed development traffic would result in an uplift of 8-9% during the AM peak. LBH state that 'this figure of 8-9% greatly exceeds the IHT guideline threshold which, as stated earlier, recommends a figure of up to 5% being an absorbable increase on a congested highway network without measurable detriment and need for mitigation'.

The CIHT traffic assessment guidelines quoted above were produced some 25 years ago and have been superseded by more recent and relevant guidance on best practice traffic assessment methodology for new developments.

Furthermore, LBH implies that the 1994 CIHT guidance indicates that any uplift in traffic flows as a result of new development of more than 5% would result in 'measurable detriment' to highway operations and would result in the 'need for mitigation'. This is a misinterpretation of the guidance, which simply advises that 'a Traffic Impact Assessment should normally be produced where one or other of the following thresholds are exceeded:

- traffic to and from the development exceeds 10% of the two-way traffic flow on the adjoining highway
- traffic to and from the development exceeds 5% of the two-way traffic flow on the adjoining highway, where traffic congestion exists or will exist within the assessment period or in other sensitive locations.'

The guidance therefore advises that a Traffic Impact Assessment should be undertaken where traffic to and from the proposed development exceeds 5% of the two-way traffic on the adjoining highway in cases where that network already suffers from congestion, as is the case at Hillingdon Circus. It does not imply that any increase of more than 5% will necessarily result in measurable detriment to the highway operation, or that there must be a requirement for mitigation. It is the assessment work itself that will determine what the impact on the road network would be and what, if any, mitigation might be required.



In the case of the proposed development, the applicant has followed this guidance by undertaking a comprehensive traffic impact assessment to understand the existing and future operation of Hillingdon Circus, both with and without the proposed development, and exploring options for mitigation in order to manage any negative impacts (see response to comment 11).

### 13. DEVELOPMENT FOOTFALL

LBH state that the number of pedestrian trips forecast to be generated by the proposed development are lower than expected. LBH also acknowledge that there are some physical deficiencies within the existing footway network at Hillingdon Circus, but accept that there is no perfect solution to this.

The pedestrian trips listed (64 AM trips and 49 PM trips) are incorrect, and relate to the previous 377-dwelling scheme. The numbers associated with the current 437-dwelling scheme and presented in table 3-7 of the Transport Assessment Addendum report (November 2018) are 72 pedestrian trips in the AM peak hour and 56 in the PM peak hour.

It should be noted that these represent trips undertaken by a single mode (walk) only, and do not include the pedestrian trips that would be made to Hillingdon LUL station or local bus stops associated with trips where train or bus would be the primary mode of travel. Including these trips would take the pedestrian trips up to 174 AM peak hour and 141 PM peak hour trips. It should also be noted that a significant number of additional pedestrian trips would be made during the wider AM and PM peak periods (i.e. 0700-1000 and 1600-1900).

The applicant agrees that there are some physical deficiencies within the existing footway network adjacent the site, and the highway improvements proposed as part of the application include significant improvements to the pedestrian crossings on 3 arms of Hillingdon Circus junction and immediately adjacent to the site on Freezeland Way, as illustrated in Drawing 70028642-SK-22-G included in Appendix A of the Transport Assessment Addendum report (November 2018). These improvements have been presented to and discussed with both LBH and TfL during pre-application meetings.

### 14. POTENTIAL PEDESTRIAN ENVIRONMENT & TRAFFIC ENHANCEMENTS AT HILLINGDON CIRCUS

LBH acknowledge that there is a fine balance between maintaining road capacity and providing pedestrian related enhancements. LBH believe that the scope for improved vehicle capacity in combination with enhanced pedestrian facilities is not expected to be realistically achievable.

The proposed alterations will improve pedestrian facilities whilst not impacting the traffic flow at the junction. As discussed in Section 6, the vehicle trip generation associated with the development will not have a significant impact on the operation of the Hillingdon Circus junction. Furthermore, as discussed in Section 9, the contributions towards the new 278 bus service will reduce baseline car traffic through the junction as there will be a north-south bus service along Long Lane.

### 15. PUBLIC TRANSPORT ENHANCEMENT / FINANCIAL CONTRIBUTION

LBH note that the developer contribution of £375,000 across five years would significantly enhance bus services for the local community. LBH also acknowledge the developer contributions towards Selective Vehicle Detection measures at Hillingdon Circus junction and bus stop improvements at Freezeland Way.

We welcome these comments and believe that these improvements, and in particular an enhanced or new north-south bus service along Long Lane, would help to alleviate congestion at the Hillingdon Circus junction.

## 16. SYNOPSIS OF HIGHWAY / PUBLIC TRANSPORT – INTERVENTIONS & GAINS

LBH list the mitigation measures that would be secured as a S106 agreement and acknowledge that an element of highway and public transport gain would result if the scheme were to proceed. They go on to state that the overarching key concern related to overburdening the Hillingdon Circus signalled junction would not be remedied, and that the cumulative traffic impacts combined with the listed committed developments would therefore render the scheme unacceptable on highway grounds.

The applicant agrees that the proposed suite of transport and highway interventions associated with the scheme would result in highway and public transport gain, benefiting occupants of the proposed development as well as the wider local community.

Regarding the traffic impact of the proposed development on Hillingdon Circus, see our responses to comments 11 and 12 above.

## 17. APPRAISAL OF THE SURROUNDING ROAD NETWORK AND SITE ACCESS INFRASTRUCTURE

### MEANS OF ACCESS TO THE SITE BY VEHICLE

LBH consider the vehicle access arrangement to be workable and appropriate.

We welcome LBH's comments on this matter.

### MEANS OF DEPARTURE FROM THE SITE BY VEHICLE

LBH require that the creation of a point 'No Entry' prohibition in the slip road just west of the site access to prevent head-on conflicts.

Noted, and this will be incorporated into the highway improvement proposals.

### INTERNAL (THRU-SITE) ROADWAYS / CYCLING / PEDESTRIAN / SERVICING PROVISIONS

LBH consider that the internal roadways give acceptable access to all modes and the design conforms to relevant guidance.

We welcome LBH's comments on this matter.

### TRAVEL PLAN – RESIDENTIAL AND COMMERCIAL / PERFORMANCE BOND CONTRIBUTION

LBH accept the methodology and targets of the Framework Travel Plan; however, they consider that there is further scope to enhance above the 3% uplift in sustainable modes. A Full Travel Plan would be secured under S106 obligation and LBH consider it justifiable to apply a 'Performance Bond' in order to assist with ensuring the continued success of the Travel Plan. This bond would amount to £20,000.

We believe a 10% reduction in single occupancy car travel over 5 years is a reasonable target, but would welcome further discussions on this with LBH. The distribution of this 10% to sustainable modes can be revisited if required by LBH.

The applicant is happy to adhere to a Travel Plan 'Performance Bond'.

### CONSTRUCTION LOGISTICS PLAN AND SERVICING DELIVERY PLAN

LBH note that servicing details have been provided within the TA and are broadly acceptable but require that a full and detailed Construction Logistics Plan and Servicing Delivery Plan are secured by planning condition.

Noted, and the applicant is happy to agree to this.



## 18. SUMMARY AND CONCLUSION

LBH recommend refusal on the basis of insufficient parking and excessive vehicular traffic generation, stating they are concerned that the proposal:

- *i) exhibits insufficient on-plot parking provisions which are likely to create undue and injudicious displaced parking on the local road network and*
- *ii) would impose added and unreasonable traffic burden on the local road network namely the Hillingdon Circus signalled junction which currently operates at and beyond workable capacity, contrary to policies AM14 and AM7 respectively of the Development Plan (2012).*

As has been evidenced in detail throughout the application process and again in this note, a car parking ratio of 0.5 spaces per dwelling reflects both national & regional policy to reduce private car usage and promote the use of more sustainable travel modes, and is representative of existing car ownership levels amongst comparable dwelling types in the local area.

This level of parking is appropriate for a development that is located immediately adjacent to an LUL station that provides rail services on two LUL lines (Metropolitan and Piccadilly) and is within easy access of local bus services. It is further supported by a comprehensive suite of hard and soft travel planning measures, which will enable lower car ownership levels without restricting accessibility, together with a robust car parking management plan that will ensure there is no detrimental impact to on-street parking demand and availability in the local streets surrounding the site.

The proposed parking ratio will also allow the development potential of the site to be met in order to bring much needed new housing to the borough, without resulting in an unacceptable detrimental impact on the surrounding road network.

Regarding the impact of the proposed development on Hillingdon Circus, the extensive traffic impact assessment work that has been undertaken during planning demonstrates that (a) the impact of the proposed development alone on the road network would be insignificant, and (b) highway mitigation and highway gain can be achieved through optimisation of the signal timings, even taking into account the cumulative impact of the proposed development and committed development. We therefore believe that traffic generated by the proposed development can be satisfactorily accommodated on the local road network, as has been recognised by TfL.

██████████  
Senior Strategic Planner, Development Management  
GREATER LONDON AUTHORITY  
City Hall,  
The Queen's Walk,  
London  
SE1 2AA

23 December 2019

Dear ██████████,

**'HILLINGDON GARDENS' - FORMER MASTER BREWER SITE, FREEZELAND WAY, HILLINGDON  
REF: 4266/PRC/2019/3088 (GLA/0995g/01)**

Knight Frank writes on behalf of Inland Limited (the 'Applicant') in relation to the re-development of the Former Master Brewer Motel Site (ref: 4266/PRC/2019/3088/GLA/0995g/01), known as 'Hillingdon Gardens'. We write in response to comments set out in your formal Stage 1 referral feedback letter (dated 02/12/2019).

Our response addresses comments raised under the following headings:

- ◆ Sustainable Development; and
- ◆ Transport.

**Sustainable Development**

Energy

*"the applicant must explore the potential for additional measures to deliver further carbon dioxide reductions. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall".*

The proposed strategy has maximised the integration of renewable energy technologies via a central block-by-block ASHP system and solar PV array at roof level which comprises a 929sq m solar PV array (circa 155.65 kWp; 566 Panels) as shown in the roof plan at **Appendix A**. Roof space for walk ways, plant and amenity space restrict the proposed array from being expanded.

Additionally, carbon savings through the following passive and energy efficiency measures have been maximised:

- a) High performance double glazing with low G values and shading co-efficient to limit the effects of solar gain;
- b) Mechanical Whole House Ventilation with Heat Recovery;

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Our registered office is 55 Baker Street, London, W1U 8AN where you may look at a list of members' names.

- c) The provision of energy efficient lighting;
- d) The provision of time and temperature zone control on HVAC systems;
- e) Improved specific fan powers.

Further carbon reductions may be possible through the specification of a market leading solar PV panel type of a high efficiency and electrical output.

Once, and if there is an improvement in PV's specified efficiency, an updated carbon offset contribution will be calculated for the site.

#### Drainage and Flood Risk

*"The proposed development does not meet the requirements of London Plan policy 5.15 and draft London Plan policy SI.5 as it does not meet the water consumption targets of these policies. The applicant must provide water efficiency information for both the residential and non-residential components of the scheme".*

The water consumption (litres/person/day) of the residential element of the development is compared against a baseline performance that will not exceed 105 litres/person/day. In order to target a maximum water consumption of 105 litres/person/day for the residential element, the following components will either meet the water efficiency consumption levels detailed in **Table 1** from Approved Document G or the Water Efficiency Calculator tool (as stated within Approved Document G) will be completed to demonstrate this level of performance per water fitting type.

<b>Table 2.1 Maximum fittings consumption</b>	
<b>Water fitting</b>	<b>Maximum consumption</b>
WC	6/4 litres dual flush or 4.5 litres single flush
Shower	10 l/min
Bath	185 litres
Basin taps	6 l/min
Sink taps	8 l/min
Dishwasher	1.25 l/place setting
Washing machine	8.17 l/kilogram

**Table 1 Water Fitting Performance Levels – Approved Document G**

For the commercial element, in order to confirm the 25% improvement in potable water consumption, the following components (where applicable/relevant) will meet the water efficiency consumption levels identified under Level 2, as detailed in **Table 2** below.

<b>Component</b>	<b>Performance Levels</b>			
	<b>Base</b>	<b>1</b>	<b>2</b>	<b>Unit</b>
WC	6	4.5	4	Effective flush volume (litres)
Wash hand basin taps	10	8	6	Litres/ min

Showers	12	10	8	Litres/ min
Baths	200	180	160	Litres
Urinal (2 or more)	7.5	6	3	Litres/ bowl/ hour
Urinal (1 only)	10	8	4	Litres/ bowl/ hour
Grey water/ rain water system	0%	0%	0%	% of WC/ urinal flushing demand met using recycled non potable water
Kitchen tap (kitchenette)	10	8	7	Litres/ min
Kitchen tap (restaurant)	10.3	9	8.3	Litres/ min
Domestic dishwashers	17	13	13	Litres/ cycle
Domestic washing machines	90	60	50	Litres/ use
Waste disposal unit	17	17	0	Litres/ min
Commercial dishwashers	8	7	6	Litres/ rack
Commercial washing machines	14	12	10	Litres/ kg

**Table 2 Water Fitting Performance Levels**

Furthermore, where relevant, the following measures will be implemented to monitor water consumption:

1. A water meter will be specified on the mains water supply to each building.
2. Water-consuming plant or building areas, consuming 10% or more of the building's total water demand, will be either fitted with easily accessible sub-meters or have water monitoring equipment integral to the plant or area.
3. Each commercial unit's water meter (main and sub) will have a pulsed or other open protocol communication output to enable connection to an appropriate utility monitoring and management system.

The development will undertake the above water efficiency and water monitoring commitments.

### Urban Greening

*"The urban greening factor must be calculated and submitted prior to the Mayor's decision making".*

The London Wildlife Trust has prepared a Biodiversity Net Gain & Urban Greening Factor Calculations report to support the application submission. A copy of the report is provided at **Appendix B**.

In summary, the report concludes that, in principle, the proposed scheme will achieve an urban greening factor of 0.4. Additionally, the proposed development will in principle achieve a positive net-gain in biodiversity producing a score of 1.4 from a baseline score of 3.8 habitat units and a proposed development scheme of 5.2 habitat units. This represents a 26% biodiversity net gain, which is above HM Government's draft recommendation of achieving 10% net gain.

The suggested recommendations identified in the report have been incorporated into the submitted documentation.

*"A plan colour coding the surface cover types set out within draft London Plan Policy G5 and an accompanying calculation table should also be provided prior to Stage 2".*

As part of the Biodiversity Net Gain & Urban Greening Factor Calculations report, coloured plans and accompanying tables coding the surface cover types of the current and proposed site have been provided. These are also provided at **Appendix B**.

*"Although a tree constraints plan has been provided, further clarification is required regarding the total number of trees proposed for removal. The proposal should ensure that, wherever possible, existing trees of quality are retained. Where it is imperative that trees are removed, there should be adequate replacement based on the existing value of the trees determined by i-tree or CAVAT".*

The submitted proposal has sought to retain existing trees of quality as far as possible. Where the removal of existing trees has been identified as imperative, mitigation against the loss of existing trees is provided. The trees that will be removed, retained and proposed as part of the proposal, in line with the Tree Constraints plan and AIA, are:

- ◆ 43no. Removed Trees (excluding groups)
- ◆ 26no. Retained Trees (excluding groups)
- ◆ 329no. Proposed Trees (including 62 trees at podium level)

In line with on-going discussions with the LPA, proposed tree planting along the western boundary has been reviewed to provide replacement trees of varying maturity (based upon girth measurement) to ensure adequate replacement/mitigation.

## **Transport**

### Site Access

*"Vehicle access via a priority junction is proposed in place of the existing site access location along Freezeland Way, approximately 50 metres east of the Hillingdon Circus junction. Pedestrian access will be provided via access points on Freezeland Way and Long Lane adjacent to Hillingdon Circus. Both are acceptable subject to the details of the highway scheme at Hillingdon Circus being agreed".*

A meeting is being arranged with Transport for London (TfL) to agree the details of the highway scheme at Hillingdon Circus. TfL has confirmed that a post Stage 1 review meeting in January 2020 should be sufficient to resolve this matter.

### Car Parking

*"In accordance with draft London Plan policy T6.1 the applicant should demonstrate how and where general car parking spaces could be converted to provide a further 7% of residential units with a blue badge space if required".*

*"Six general car parking spaces for visitors and the commercial units are proposed, this is welcomed. However, at least one of these spaces should be allocated for use by blue badge holders".*

A Blue Badge Parking Strategy (ref. 70057679-TP-SK-18 A) has been prepared to demonstrate how a further 7% of residential units with a Blue Badge space could be accommodated, if required. One visitor bay has also been allocated for use by blue badge holders. A copy of the strategy ref. 70057679-TP-SK-18 A is provided at **Appendix C**.

We confirm that residents would be exempt from eligibility for parking permits on the streets surrounding the site, and that on-site parking spaces will be leased and not sold. This will be confirmed in the final Car Parking Management Plan that will be secured by planning condition.

#### Healthy Streets

*"TfL requests that further discussion takes place prior to determination of the application to agree the full package of highway interventions".*

As above, a meeting is being arranged with TfL to agree the package of highway interventions. TfL has confirmed that a post Stage 1 review meeting in January 2020 should be sufficient to resolve this matter.

#### Public Transport

*"The proposed development is expected to generate 88 and 53 two-way bus trips in the AM and PM peaks respectively. In order to ensure that sufficient sustainable transport is in place to support the development, a financial contribution must be secured to increase the frequency of route 278 from four to five buses per hour. The estimated cost of delivering this is £455,000 per annum, therefore the total cost to cover three years pump priming is £1.365 million which should be secured as part of any future S.106.*

*The transport assessment includes a station capacity assessment. This assessment needs to be refined in accordance with detailed comments provided to the applicant in order to demonstrate that the additional trips generated by the proposals can be accommodated within the existing station infrastructure".*

The financial contribution towards increasing the frequency of route 278 bus service from four to five buses per hour will be agreed and secured as part of the future S106 agreement.

The Station Capacity Assessment (SCA) of Hillingdon Station has been completed. The enclosed Station Capacity Assessment technical note provided at **Appendix D** outlines the results of the SCA with the updated dataset. The development does not impact the station operation significantly and the conclusions do not change.

#### Travel Planning, Delivery & Servicing, and Construction

*"The applicant has submitted a draft travel plan, delivery & servicing, and construction logistics plan. Within the travel plan the target relating to increasing car club use should be deleted and replaced with a target better reflecting the ambitions in the Mayor's Transport Strategy to increase active travel. Notwithstanding this, the plans are generally acceptable in strategic transport terms and should be secured by appropriate planning condition".*

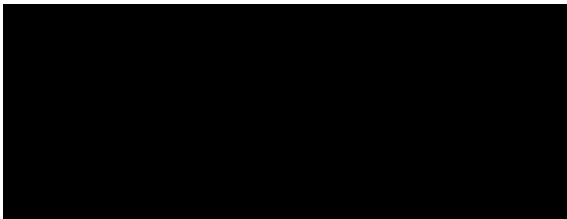
The Travel Plan has been amended accordingly. A copy of the updated report is provided at **Appendix E**.

In accordance with the Mayor's aspirations for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041, the Travel Plan will aim to achieve an 80% mode share by modes other than car driver during the AM and PM peak hours. This target is considered achievable within a 5 year timeframe.

## Conclusion

We trust that the comprehensive responses outlined provide sufficient further information to satisfy the comments and queries raised. However, should you require anything further, please do not hesitate to contact me at this office [REDACTED] [t@knightfrank.com](mailto:[REDACTED]@knightfrank.com)).

Yours sincerely,



Partner

(On behalf of Inland Limited)

cc. [REDACTED], Principal Planner, LB Hillingdon

## Appendix A

Roof Plan showing PV Arrangement



Figure 1. Hillington Gardens site Roof Plan showing the PV arrangement



## **Appendix B**

Biodiversity Net Gain & Urban Greening Factor Calculations report (October 2019);

Colour Coded PROPOSED HABITAT AREAS PLAN (Ref. BMD.19.020.DR.903)

# Hillingdon Gardens

## Biodiversity Net Gain & Urban Greening Factor Calculations

October 2019

**Biodiversity Net Gain summary:** In principle<sup>1</sup>, the Proposed Development will achieve a positive net-gain in biodiversity producing a score of 1.4, from a baseline score of 3.8 habitat units and a proposed development scheme of 5.2 habitat units. This a 26% biodiversity net gain, which is above HM Government's draft recommendation of achieving 10% net gain. Summary tables and plans are provided at the back of this report.

**Urban Greening Factor summary:** In principle<sup>2</sup> the Proposed Development has achieved an urban greening factor of 0.4. Summary table is provided at the back of this report.

**Caveat:** The Biodiversity Net Gain and Urban Greening Factor scores are based on detailed information relating to habitat type<sup>3</sup> (area x distinctiveness x condition x spatial connectivity x location) and surface cover type<sup>4</sup> (area x surface cover factor) respectively. Any changes to the design, size or function of the development may affect scores. For this reason, these scores are valid for three months from the date of this report.

**Sources of information:** Information from the following key sources:

- Phase 1 Habitat Areas (BMD. 19. 020. DRE. 903, dated 04/09/2019)
- Ecological Assessment (BMD. 19.020.RPE/P1.801.RevA. Ecology, Dated 09,2019)
- Proposed Habitat Areas Plan (BMD.19.020. DR.903, dated 13/09/2019)
- Email communication between BMD landscape and ecology staff, during above dates).

### The following assumptions need to be understood:

- The existing site supports 10 distinct habitat types, which comprise.
  - Dry ditch and tree line
  - Broadleaf trees
  - Amenity grassland
  - Bare ground
  - Broadleaf plantation woodland
  - Hardstanding
  - Introduced shrub
  - Poor-semi-improved grassland
  - Scattered scrub
  - Tall ruderal
- The London and Hillingdon Biodiversity Action Plan Priority Habitats: Woodland<sup>5</sup> and Wasteland<sup>6</sup> occur on site. Based on the Ecological Assessment these habitats are in poor condition and are of low ecological value.

<sup>1</sup> Recognising the assessment is based on information that might change through detailed design, reserved matters, construction and site management. The development and its net-gain score will need to be verified at each stage to ensure intended score and ecological value.

<sup>2</sup> Recognised the assessment is based on information that might change through detailed design and reserved matters. The development and its urban greening score will need to be verified at each stage to ensure intended score and ecological value.

<sup>3</sup> <https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>

<sup>4</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-8-green-infrastructure-and-natural-environment/policy-g5>

<sup>5</sup> Woodland <http://downloads.gigl.org.uk/website/final%20woodland.pdf>

<sup>6</sup> Wasteland <http://downloads.gigl.org.uk/website/final%20wasteland.pdf>

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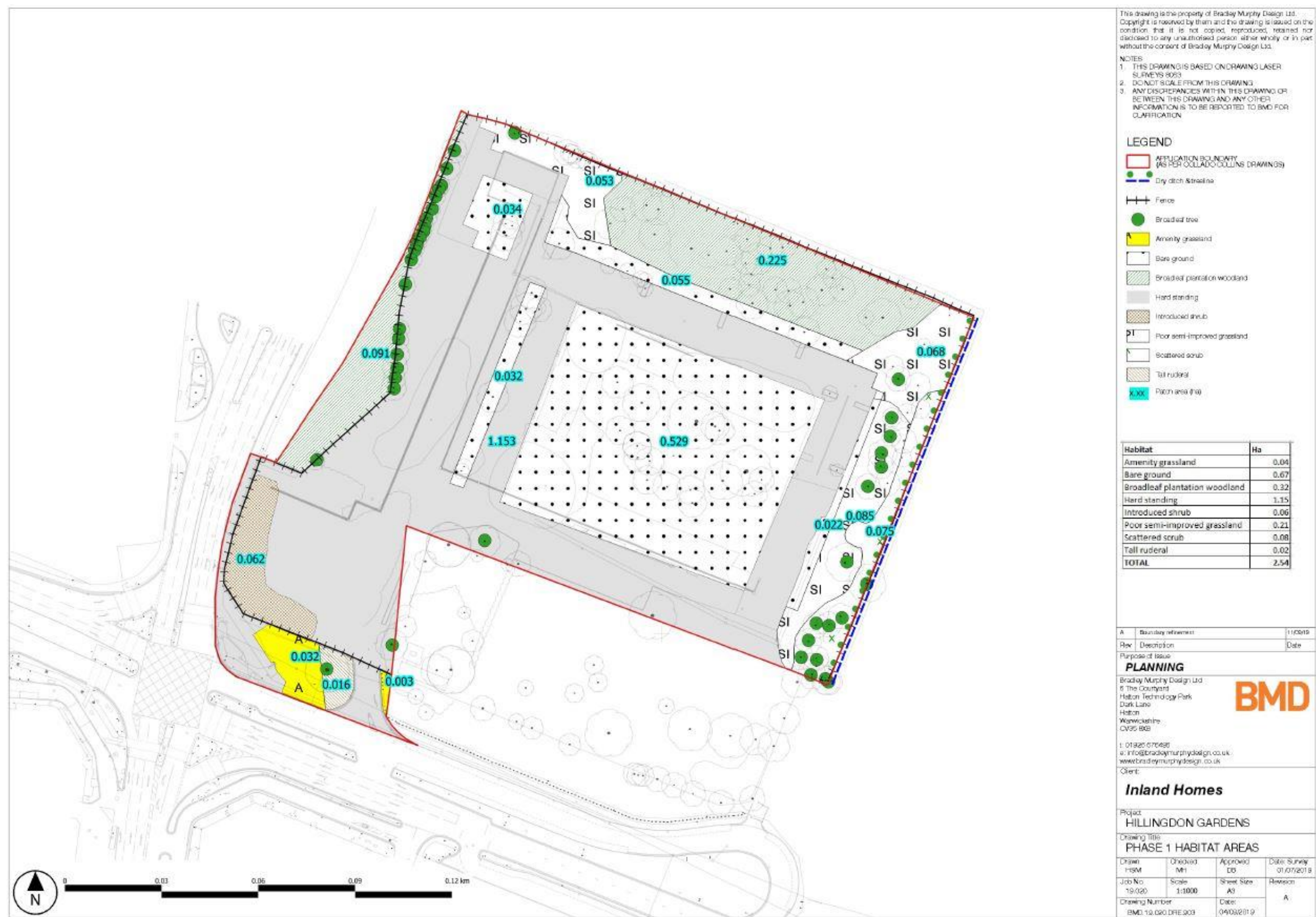
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- The Biodiversity Net-Gain score is based on the creation of 8 distinct habitat types comprising:
  - Sealed surfaces (hardstanding)
  - Broadleaved woodland
  - Mixed native scrub
  - Modified grassland (amenity lawn)
  - Street trees (in hard-surfacing)
  - Open mosaic habitat
  - Introduced shrubs (including herbaceous planting)
  - Flower rich/species-rich neutral grassland
- How these habitat types are managed will influence their value to wildlife and therefore their habitat unit score. At present, the management of these habitats are not known and so they have been assessed as achieving poor condition<sup>7</sup>, until such time further information is provided.
- The assessment has been undertaken using Defra's Biodiversity Net Gain Calculator, a toolkit that is undergoing review, testing and consultation. Any outputs are provisional until the finalised new version is released later this year.
- The proposed design has worked hard to provide new wildlife-rich habitats, and these include predominantly native species mixes replicating, as best possible, locally characteristic woodland habitat within the development boundary.
- In principle, the Proposed Development will also achieve a net gain in relation to linear features. The existing dry-ditch and tree line, being replaced with a native-species hedgerow with additional trees approximately 289m in length.
- The Urban Greening Factor score is based on the creation of 12 distinct surface cover types comprising:
  - Buildings (excluding green roofs/podiums)
  - Sealed surfaces
  - Permeable paving
  - Semi-natural vegetation
  - Hedgerow
  - Ground cover
  - Flower rich grassland
  - Standard trees in connected pits
  - Standard trees in individual pits
  - Rain gardens and SUD's
  - Extensive green roof
  - Intensive green roof
- **Recommendations:**
  - The landscape plan in its current form does not visualise the habitats (e.g. woodland) or ecosystem functions (e.g. surface water management) of the proposed scheme. A revised plan would be beneficial for planning and future management.
  - If existing broadleaf woodland habitat can be retained and enhanced (rather than be removed and recreated) – this would improve the Biodiversity Net Gain score.

---

<sup>7</sup> Condition varies between different habitat types. Some factors that can affect condition include land management practices, disturbance (from humans and cats), compaction, presence and spread of invasive species.

# Existing Habitats: Habitat Types (Phase 1 Methodology)



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# Existing Habitats: Biodiversity Units (Defra Net Gain)

## Area

UK Habitats - Existing habitats															
UK Habitats - Existing habitats				Habitat Distinctiveness		Habitat Condition		Spatial Connectivity			strategic significance			Ecological Baseline	
Ref	Broad Habitat	Enter Baseline Habitat Data Below	Area ha	Distinctiveness	Score	Condition	Score	Spatial Connectivity Rang	Connectivity	Connectivity Multiplier	Strategic Significance	Strategic Significan	Strategic Position Multiplier	Suggested Action	Total Habitat Unit
1	Grassland	Grassland - Modified grassland	0.04	Low	2	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Potential to Develop	0.088
2	Urban	Urban - Vacant/derelict land/ bareground	0.67	Low	2	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Potential to Develop	1.474
3	Woodland and forest	Woodland and forest - Other woodland; broadleaved	0.32	Medium	4	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Mitigate or Compensate	1.41
4	Urban	Urban - Developed land; sealed surface	1.15	V.Low	0	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Potential to Develop	0.00
5	Urban	Urban - Introduced shrub	0.06	Low	2	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Potential to Develop	0.13
6	Grassland	Grassland - Modified grassland	0.21	Low	2	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Potential to Develop	0.46
7	Heathland and shrub	Heathland and shrub - Mixed scrub	0.08	Low	2	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Potential to Develop	0.18
8	Grassland	Grassland - Tall herb communities	0.02	Low	2	Poor	1	Score 33-56	Moderate aggregation / connectivity	1.1	Area/compensation not in local policy/ no local policy	Low Strategic Significance	1	Potential to Develop	0.04

Total Habitat Units (Existing): 3.8

## Linear

	UK Habitats - Existing habitats			Habitat Distinctivness		Habitat Condition		Spatial Connectivity			strategic significance				Ecological Baseline		retention category Biodiversity value			
Ref	hedge number	Hedgerow type	length KM	Distinctivness	Score	Condition	Score	Spatial Connectivity Range	Connectivity	Connectivity Multiplier	Strategic Significance	Strategic Significance	Strategic Position Multiplier	Suggested Action	Total Hedgerow		Length Retained	Units Retained	Length Lost	Units Lost
1	1	Line of Trees	0.179	Low	2	Poor	1	Score 57-81	Highly aggregated / connected	1.15	Within area formally identified in local policy	High strategic significance	1.15	Potential to Develop	0.473455		0	0	0.179	0.47346
2																				
3																				

Total Linear Habitat Units (Existing): 0.5

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## Proposed Habitats: Landscape Planting Areas



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Proposed Habitats: Biodiversity Units (Defra Net Gain)

Area

Change in Distinctiveness and Condition								Spatial Quality						Risk Multipliers				
Proposed Habitat	Distinctiveness Movement	Condition movement	Area ha	Distinctiveness	Score	Condition	Score	Spatial Connectivity			Strategic significance			Temporal Multiplier		Difficulty Multipliers		Habitat Units Delivered
								Spatial Connectivity Score	Connectivity	Connectivity Multiplier	Strategic Significance	Strategic Significance	Strategic Position Multiplier	Time to Target Condition/Yrs	Time to Target Multiplier	Difficulty of Creation Category	Difficulty of Creation Multiplier	
Urban - Developed land; sealed surface			1.35	V.Low	0	Poor	1	Score 57-81	Highly aggregated / connected	1.15	Within area formally identified in local policy	High strategic significance	1.15	0	1.000	Low	1	0.00
Woodland and forest - Other woodland; broadleaved			0.15	Medium	4	Poor	1	Score 57-81	Highly aggregated / connected	1.15	Within area formally identified in local policy	High strategic significance	1.15	20	0.490	Medium	0.67	0.26
Heathland and shrub - Mixed scrub			0.03	Low	2	Poor	1	Score 57-81	Highly aggregated / connected	1.15	Within area formally identified in local policy	High strategic significance	1.15	1	0.965	Low	1	0.08
Grassland - Modified grassland			0.3	Low	2	Poor	1	Score 57-81	Highly aggregated / connected	1.15	Within area formally identified in local policy	High strategic significance	1.15	1	0.965	Low	1	0.77
Urban - Street Tree			0.01	Low	2	Poor	1	Score 57-81	Highly aggregated / connected	1.15	Within area formally identified in local policy	High strategic significance	1.15	20	0.490	Low	1	0.01
Urban - Open Mosaic Habitats on Previously Developed Land			0.36	High	6	Poor	1	Score 57-81	Highly aggregated / connected	1.15	Within area formally identified in local policy	High strategic significance	1.15	2	0.931	Low	1	2.66
Urban - Introduced shrub			0.11	Low	2	Poor	1	Score 33-56	Moderate aggregation /	1.1	Within area formally identified in local policy	High strategic significance	1.15	1	0.965	Low	1	0.27
Grassland - Other neutral grassland			0.21	High	6	Poor	1	Score 33-56	Moderate aggregation /	1.1	Within area formally identified in local policy	High strategic significance	1.15	1	0.965	Medium	0.67	1.03
Grassland - Modified grassland			0.07	Low	2	Poor	1	Score 33-56	Moderate aggregation /	1.1	Within area formally identified in local policy	High strategic significance	1.15	1	0.965	Low	1	0.17

Total Habitat Units delivered: 5.2

Linear

						Spatial Quality										
Existing habitats		Habitat Distinctivness		Habitat Condition		Spatial Connectivity				strategic significance		Temporal Multiplier		Difficulty of Creation Category	Difficulty of Creation Multiplier	Hedge Units Delivered
Habitat Type	Length km	Distinctivness	Score	Condition	Score	Spatial Connectivity Score		Connectivity Multiplier	Strategic Significance	Strategic Significance	Strategic Position Multiplier	Time To Target Condition/Years	Time to Target Multiplier			
Native Hedgerow with trees	0.289	Low	2	Poor	1	Score 9-32	Low aggregation / connectivity	1	Within area formally identified in local policy	High strategic significance	1.15	1	0.965	Low	1	0.64

Total Linear Units delivered: 0.64

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Urban Greening Factor

Proposed Habitats (as per landscape plan)	Surface cover types *	Area (m2)	ha	Factor	Score	* Interpreted Surface cover type from London Plan, G5 Table 1.
Buildings	Buildings	4404	0.440	0	0	
hardstanding	Sealed surface	4105	0.411	0	0	
Permeable paving	Permeable paving	4524	0.452	0.1	0.04524	
Located on solid ground						
Native Species Rich Shrub/scrub planting	semi-natural vegetation	248	0.025	1	0.0248	
Naturalistic /Native Planting	semi-natural vegetation	1262	0.126	1	0.1262	
Native Hedge Planting	hedge	289	0.029	0.6	0.01734	
Amenity Hedge Planting	hedge	0	0.000	0.6	0	
Garden Planting	ground cover	0	0.000	0.5	0	
Amenity lawns	Flower rich grassland	2766	0.277	1	0.2766	
Trees in connected tree pits + below ground cells	Standard trees in connected pits	60	0.006	0.8	0.0048	
Trees in individual pits	Standard trees in individual pits	6	0.001	0.6	0.00036	
Species Rich Wildflower Meadow	semi-natural vegetation	910	0.091	1	0.091	
Species Rich Wet Wildflower Meadow	Rain gardens and SUDs	1220	0.122	0.7	0.0854	
Located above ground (e.g. podium level or roof)						
hardstanding	hardstanding	489	0.049	0	0	
Permeable paving	Permeable paving	0	0.000	0.1	0	
biodiverse green roof	Extensive green roof (80-150mm)	3649	0.365	0.7	0.25543	
Ornamental Planting	Intensive green roof (150mm >)	0	0.000	0.8	0	
Native Hedge Planting	Intensive green roof (150mm >)	0	0.000	0.8	0	
Amenity Hedge Planting	Intensive green roof (150mm >)	279	0.028	0.8	0.02232	
Garden Planting	Intensive green roof (150mm >)	847	0.085	0.8	0.06776	
Amenity Lawns	Intensive green roof (150mm >)	190	0.019	0.8	0.0152	
Trees in connected tree pits + below ground cells	Standard trees in connected pits	0	0.000	0.8	0	
Trees in individual pits	Standard trees in individual pits	0	0.000	0.6	0	
Species Rich Wildflower Meadow	Rain gardens and SUDs	0	0.000	0.7	0	
Species Rich Wet Wildflower Meadow	Rain gardens and SUDs	0	0.000	0.7	0	
Total site area		25248	2.525	0.408923		

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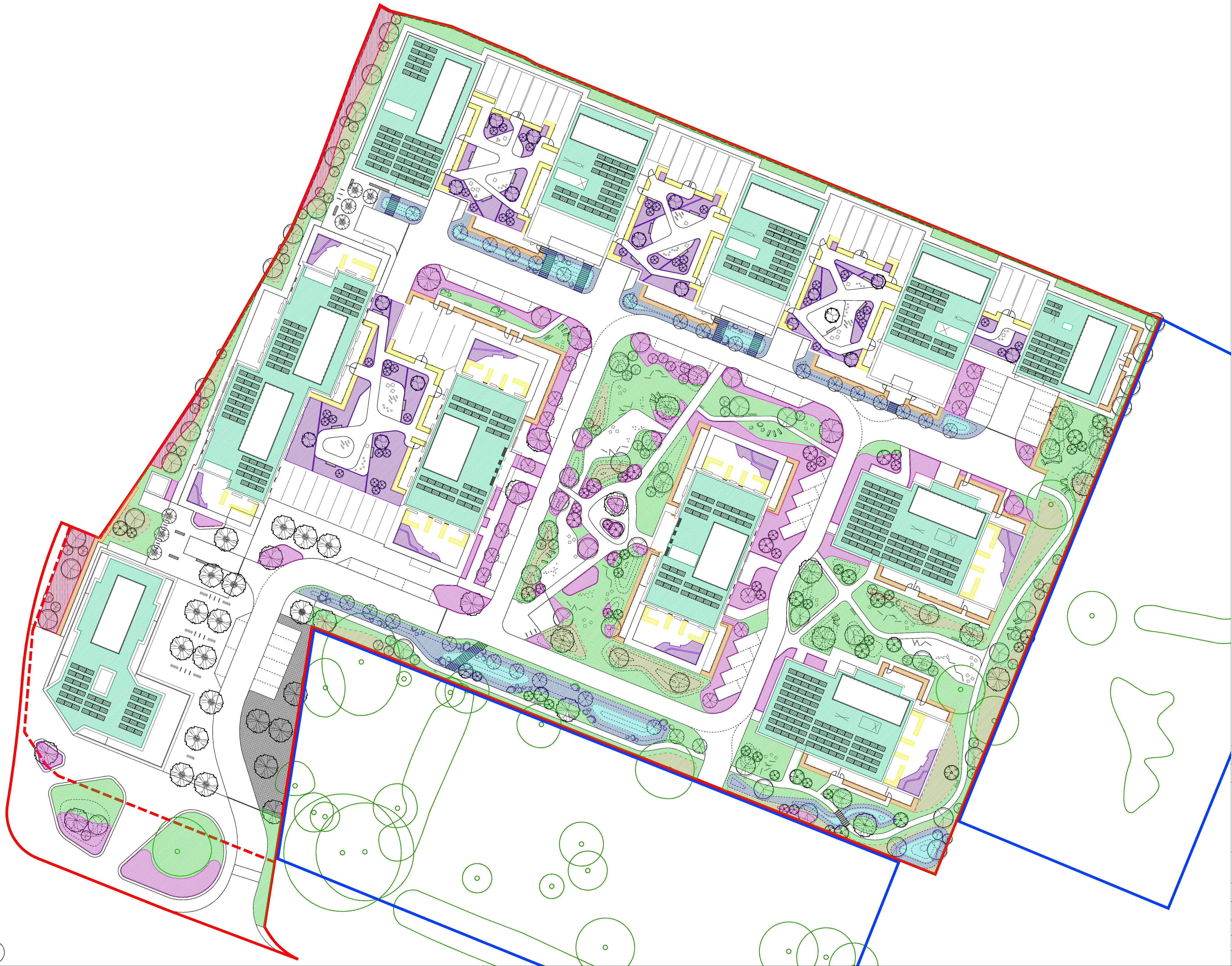




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- NATIVE SPECIES RICH SHRUB/SCUB PLANTING 248M<sup>2</sup>
- ORNAMENTAL PLANTING 1282M<sup>2</sup>  
60% NATIVE SPECIES  
40% WILDLIFE FRIENDLY NON-NATIVE SPECIES
- GARDEN PLANTING 847M<sup>2</sup>  
WILDLIFE FRIENDLY NON-NATIVE SPECIES
- NATIVE HEDGE PLANTING 289M<sup>2</sup>
- AMENITY HEDGE PLANTING 279M<sup>2</sup>
- AMENITY LAWNS 2798M<sup>2</sup>
- SPECIES RICH WILDFLOWER MEADOW 910M<sup>2</sup>
- SPECIES RICH WET WILDFLOWER MEADOW 842M<sup>2</sup>
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- BIO-DIVERSE GREEN ROOF 3649M<sup>2</sup>

Rev	Description	Date
Purpose of Issue		
INFORMATION		
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HILLINGDON GARDENS		
Drawing Title		
PROPOSED HABITAT AREAS PLAN		
Drawn DB	Checked CC	Approved CC
Job No. 19.020	Scale NTS	Sheet Size A1
Drawing Number BMD.19.020.DR.903		
Date 13/09/2019		
Revision		
-		





## **Appendix C**

Blue Badge Parking Strategy 70057679-TP-SK-18 A





DO NOT SCALE

PODIUM PARKING COUNT	
BAY TYPE	GROUND LEVEL
STANDARD	66
BLUE BADGE	38
TOTAL RESIDENTIAL COMMERCIAL / VISITOR	104
CAR CLUB	0
MOTORBIKE	13

EXTERNAL PARKING COUNT	
BAY TYPE	GROUND LEVEL
STANDARD	17
BLUE BADGE	14
TOTAL RESIDENTIAL COMMERCIAL / VISITOR	30
STANDARD COMMERCIAL /VISITOR	5
BLUE BADGE	1
CAR CLUB	4
MOTORBIKE	0

TOTAL	
BAY TYPE	GROUND LEVEL
RESIDENT	83
BLUE BADGE	51
TOTAL RESIDENTIAL COMMERCIAL / VISITOR	134
STANDARD COMMERCIAL /VISITOR	5
BLUE BADGE	1
MOTORBIKE	13

- CAR CLUB BAYS
- VISITOR BAYS
- ELECTRIC CHARGING BAY
- BLUE BADGE PARKING BAY
- MOTORCYCLE PARKING BAY

A

13/12/2019

HFM

FIRST ISSUE

PLO

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REV	DATE	BY	DESCRIPTION	CHK	APP
DRAWING STATUS					
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CLIENT:  
INLAND HOMES

ARCHITECT:  
COLLADO COLLINS

PROJECT:  
HILLINGDON GARDENS

TITLE:  
PROPOSED PARKING ARRANGEMENTS WITH DISABLED PARKING FOR 10% OF RESIDENTIAL DWELLINGS

SCALE @ A2: 1:250	CHECKER: BJS	APPROVED: TJG
PROJECT NO: 70057679	DESIGNED: CRUB	DRAWN: HFM
DATE: December 19		REV:
DRAWING NO: 70057679-TP-SK-18		A
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## **Appendix D**

Station Capacity Assessment Technical Note (December 2019)

## Hillingdon Gardens, Freezeland Way, Hillingdon

# STATION CAPACITY ASSESSMENT NOTE

### NOTE PURPOSE

This document provides a summary of the revised Station High Level Capacity Review at Hillingdon London Underground station, to accompany the Transport Assessment submitted as part of the proposed development at the Former Master Brewer site in Hillingdon, northwest London.

Following the submission of the Transport Assessment, TfL have asked that WSP update the Station Capacity Assessment using more recently available datasets. The purpose of this note is to provide a revised assessment of the footbridge width and gate line requirements according to the LU Station Planning guidance, considering the TfL RODS / NUMBAT data from 2018, cumulative schemes in the local area, and additional demand generated by the proposed development. This note will therefore outline and seek to agree the results of the Station Capacity Assessment.

### STATION CAPACITY ASSESSMENT

The assessment was based in the exit and entry peak 15 minutes according to RODS / NUMBAT data from 2018, and the results are contained in **Appendix A**. The additional Underground trips related to the proposed development and nearby cumulative schemes have also been extracted from the Transport Assessment<sup>1</sup> and Trip Generation Note<sup>2</sup> and applied to the assessment. Using the peak hour factors from S1371 A6 LU Station Planning Guidance, the station peak 15 minute, peak 5 minute and peak minute demands at the footbridge and car park are described in **Table 1**.

Table 1: Boarders and alighters by line

Peak		Peak 15 min at footbridge	Peak 15 min at car park	Peak 5 min at footbridge	Peak 5 min at car park	Avg peak min at footbridge	Avg peak min at car park
AM Peak	Entry	183	34	73	14	12	2
	Exit	42	8	17	3	3	1
PM Peak	Entry	46	22	18	9	3	1
	Exit	91	17	36	7	6	1

### Footbridge width requirements

Considering the peak flows forecast, **Table 2** shows that the footbridge current provision surpasses the required clear width and allows comfortable passenger circulation during peak periods.

Table 2: Peak demands and footbridge width requirements and provisions

Peak		Peak 15 min at Footbridge	Peak 5 min at Footbridge	Peak demand (people/min)	Min. Width required (m)	Width provided
AM Peak	Entry	183	73	18 people/min	1.9m	4.5m
	Exit	42	17			
PM Peak	Entry	46	18	11 people/min	1.9m	4.5m
	Exit	91	36			

<sup>1</sup> 191003\_Hillingdon Gardens\_Transport Assessment\_Final.docx

<sup>2</sup> 190718\_Hillingdon Gardens\_Trip Gen Note.docx

## Gate line requirements

**Table 3** shows the forecast peak 5 minute entry and exit flow at the station. The number of boarders and alighters is based on the frequency of trains.

*Table 3: Entry and exit flows*

	AM peak	PM peak	Train frequency (trains per hour)	
5 minute entry flow	87	27	AM Peak	PM Peak
EB Metropolitan line exits	18	40	10	9
WB Metropolitan line exits	0	2	9	10
EB Piccadilly line exits	9*	0	8	8
WB Piccadilly line exits	7	9	7	8

*\*As original demand data is absent from RODS, it is assumed to be the inverse of westbound flow (higher values than figures interpolated using overall entry / exit data)*

**Table 4** shows that 4 gates (including at least 1 wide aisle gate) will be required to cater for the peak periods with the additional flows related to the proposed development as well as nearby cumulative schemes.

*Table 4: Gate line requirements and provisions*

	AM peak	PM peak
5 minute entry flow	87	27
Peak EB alighters	27	40
Peak WB alighters	7	11
<b>Gate requirement</b>	<b>3 (2+1 WAG)</b>	<b>4 (3+1 WAG)</b>
<b>Gate provision</b>	<b>4 (3+1 WAG)</b>	<b>4 (3+1 WAG)</b>

## SUMMARY

This technical note outlines the results of the revised Station Capacity Assessment at Hillingdon station, to determine the impact of the London Underground trip generation associated with the proposed development at the Former Master Brewer site in Hillingdon.

The revised assessment has utilised RODS / NUMBAT data from 2018, and shows that the current provisions of the station for the footbridge and gate lines are sufficient to cater the current passenger demands and additional demands related to the proposed development and nearby cumulative schemes. Future demand increases to the network have not been considered at this point.

## **Appendix A – Station Capacity Assessment**



Baseline + Cumulative Schemes + Development

Gateline Requirement	4
Bridge Width Requirement (m)	1.9
Bridge Level of Service	B

Development Demand

Source: Trip Generation Note, July 2019

Underground Trips	AM Peak Hour		PM Peak Hour		Relative to Development
	In	Out	In	Out	
		6	45	13	11

RODS Data

Entry												
Time period	Bus/Coach	Bicycle	Motorcycle	Car/Van Parked	Car/Van driven away	Walked	Taxi/ Minicab	RiverBus/Ferry	Other	Not Stated	Total all modes	
Early	40	0	0	0	111	36	164	0	0	0	0	351
AM Peak	241	0	0	0	440	154	582	1	0	0	26	1444
Midday	117	0	0	0	154	33	445	0	0	0	2	751
PM Peak	167	0	0	0	42	91	113	0	0	0	75	488
Evening	23	0	0	0	18	26	65	0	0	0	0	132
Late	14	0	0	0	0	9	1	0	0	0	3	27
Total	602	0	0	0	765	349	1370	1	0	0	106	3193

Exit												
Time period	Bus/Coach	Bicycle	Motorcycle	Car/Van Parked	Car/Van driven away	Walked	Taxi/ Minicab	RiverBus/Ferry	Other	Not Stated	Total all modes	
Early	75	0	0	0	0	1	1	0	0	0	0	77
AM Peak	62	0	0	0	0	17	136	0	0	0	169	384
Midday	77	0	0	0	43	61	311	0	0	0	9	501
PM Peak	164	0	0	0	277	41	452	25	0	0	42	1001
Evening	113	69	0	0	51	15	185	0	0	0	44	477
Late	0	0	0	0	45	0	71	0	0	0	114	230
Total	491	69	0	0	416	135	1156	25	0	0	378	2670

Boarders by Line				Alighters by Line							
Line	Direction	AM Peak	PM Peak	Line	Direction	AM Peak	Base PM Peak	Base + Cumulative AM Peak	Cumulative PM Peak	AM Peak	With Dev. PM Peak
Metropolitan	N	4	8	Metropolitan	N	43	87	87	43	87	45
	S	180	37		S	0	4	4	0	4	0
Piccadilly	E	14	8	Piccadilly	E	17	0	17	0	17	17
	W	2	0		W	12	17	12	17	12	17

Peak Hour Factors

Source: S1371 A6 LU Station Planning Guidance  
Zone 6

	AM Peak	PM Peak
3h -> 1h	0.48	0.39
1h -> 15min	0.27	0.26
15min -> 5min	0.4	0.4

Station Demand Breakdown

		Peak 3 Hours		Peak Hour		Peak 15 Minutes		Peak 5 Minutes		Average Peak Minue	
		Bridge	Parking Lot	Bridge	Parking Lot	Bridge	Parking Lot	Bridge	Parking Lot	Bridge	Parking Lot
AM Peak	Entry	1203	241	622	116	183	34	73	14	12	2
	Exit	322	62	161	30	42	8	17	3	3	1
PM Peak	Entry	321	167	136	65	46	22	18	9	3	1
	Exit	837	164	339	64	91	17	36	7	6	1

Gateline Requirements

	AM		PM		TPH		Headway (minutes)	
	AM	PM	AM	PM	AM	PM	AM	PM
5-minute Entry Flow	87	27						
NB Metropolitan Line Exits	18	40	10	9	6.0	6.7		
SB Metropolitan Line Exits	0	2	9	10	6.7	6.0		
EB Piccadilly Line Exits	9	0	8	8	7.5	7.5		
WB Piccadilly Line Exits	7	9	7	8	8.6	7.5		
Peak WB Alighters	7	10						
Peak EB Alighters	26	40						
Gate Requirement:	3	4						

Bridge Width Requirements

Existing Width:	4.5 m
AM Peak Demand	18 pax/mins
PM Peak Demand	11 pax/mins
	1.049612022
	0.873586701
Width Requirement	1.9 m
Level of Service	B

## **Appendix E**

Residential Travel Plan (December 2019)



Inland Homes Ltd

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# **HILLINGDON GARDENS**

Residential Travel Plan



Inland Homes Ltd

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# HILLINGDON GARDENS

## Residential Travel Plan

**TYPE OF DOCUMENT (VERSION) PUBLIC**

**PROJECT NO. 70057679**

**DATE: DECEMBER 2019**

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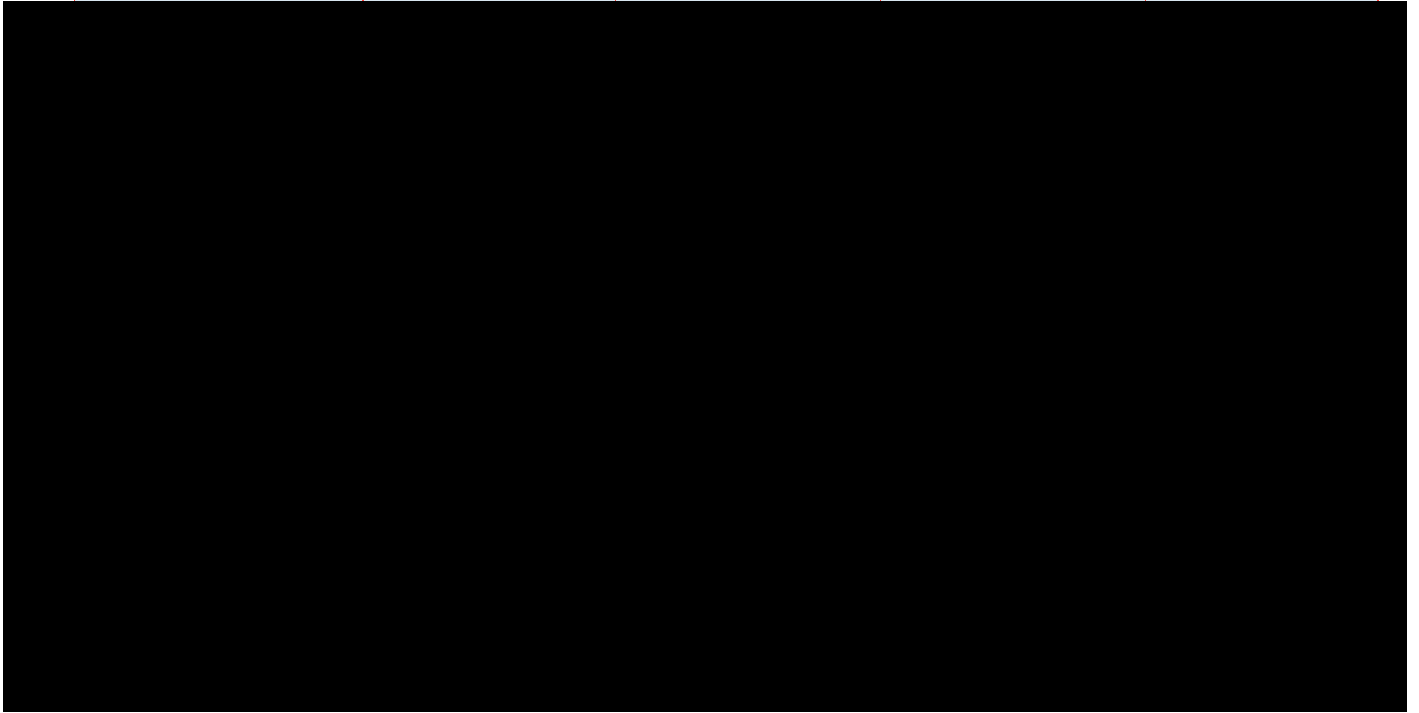
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# QUALITY CONTROL

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Issue/revision	First issue	Revision 1	Revision 2	Revision 3
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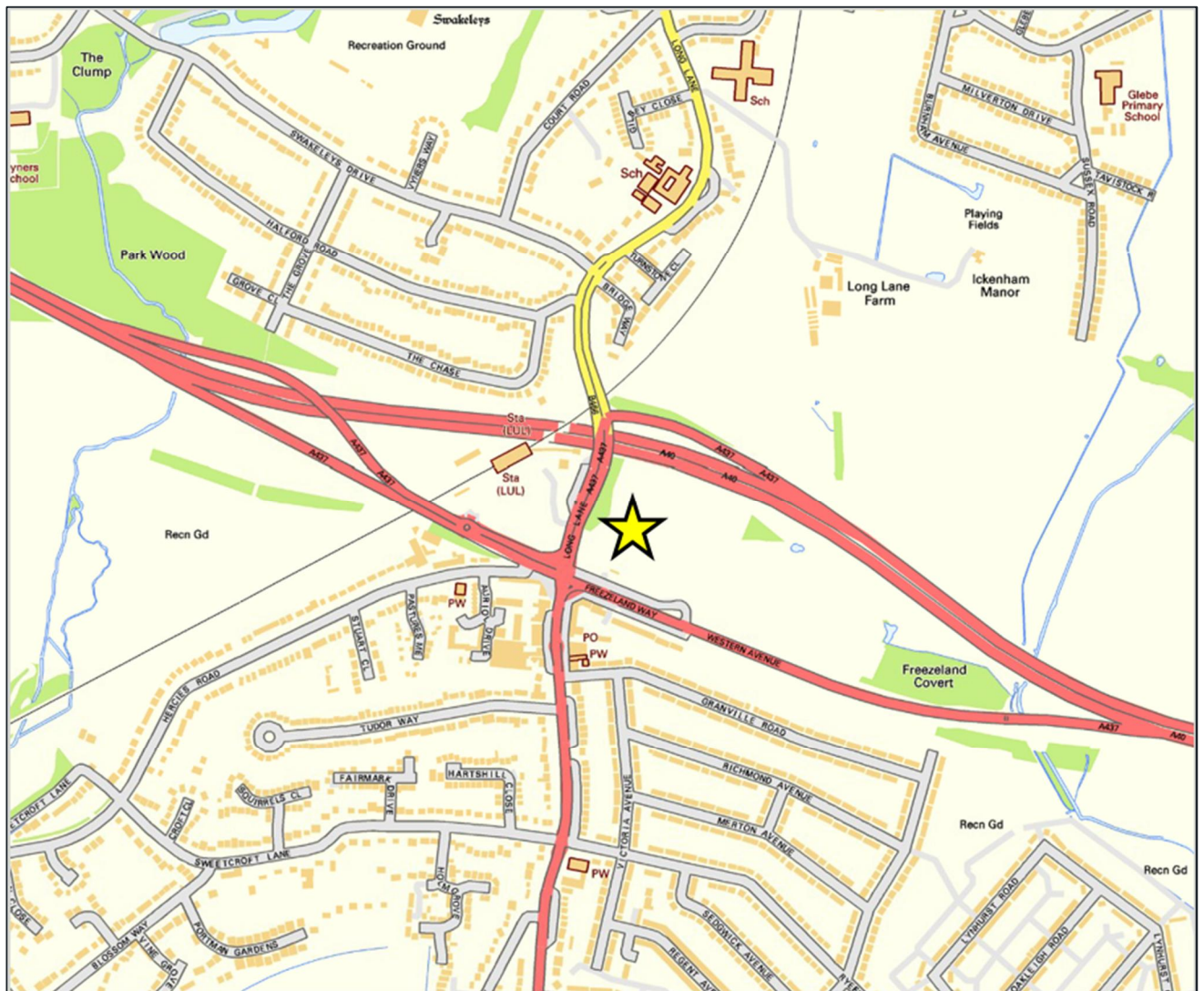


# 1 INTRODUCTION

## 1.1 COMMISSION

- 1.1.1. WSP has been commissioned by Inland Homes Ltd to produce this Travel Plan in support of the proposed development at the Former Master Brewer site, located in the London Borough of Hillingdon.
- 1.1.2. The site is located on Freezeland Way, to the northeast of the Hillingdon Circus junction, as shown in **Figure 1-1**. The site comprises 2.53 hectares of land and is currently a vacant brownfield site that was formerly occupied by the Master Brewer Motel and Public House, as well as associated buildings.

**Figure 1-1: Site location**



## 1.2 PROPOSALS SUMMARY

1.2.1. The proposed development description is as follows:

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

1.2.2. As per the above description, the proposed development will comprise the following land uses:

- i Residential (C3)
- i Flexible retail (A1-A3)
- i Community space (D1)
- i Office (B1a)

1.2.3. A more detailed breakdown of the development proposals is detailed in **Table 1-1**.

**Table 1-1: Proposed development schedule**

Land Use	Relevant development quantum
Residential (C3)	514 units
Flexible retail (A1-A3) / community space (D1) / office (B1)	1,259m <sup>2</sup>

## 1.3 TRAVEL PLAN OVERVIEW

1.3.1. In TfL’s latest guidance, it defines a Travel Plan as:

*‘a long-term management strategy for an existing or proposed development that seeks to integrate proposals for increasing sustainable travel by the future occupier(s) into the planning process and is articulated in a document that is to be regularly reviewed by the future occupier(s) of the site’.*

1.3.2. The Travel Plan involves identifying an appropriate package of measures aimed at promoting sustainable travel, with an emphasis on ‘promoting alternatives to the car’.

1.3.3. The Travel Plan establishes a structured strategy with clear objectives and targets, supported by suitable policies and quality measures for implementation. It is noted that whilst the location of a development, its physical design and proximity to facilities and services create the conditions to make sustainable travel choices a natural option, communicating these opportunities to occupiers is also critical to the success of the Travel Plan.

1.3.4. The Travel Plan will be a ‘living document’ requiring monitoring, regular reviews and revisions to ensure it remains relevant to the site and those using the site and provides continuous improvements for its duration.

- 1.3.5. The Travel Plan demonstrates a holistic approach by incorporating both ‘hard’ engineering measures and ‘soft’ marketing and management measures necessary to address the transport impacts arising from development. The Applicant is fully supportive of the Travel Plan and appreciates the benefit of using and encouraging greater use of sustainable transport for both people and goods.

## **1.4 TRAVEL PLAN PURPOSE AND STRUCTURE**

- 1.4.1. The measures set out in the Travel Plan have been discussed in length with Highway Officers at LBH to agree appropriate measures, targets and monitoring requirements prior to implementation.
- 1.4.2. The structure of the Travel Plan has been prepared to reflect the structure advised within TfL’s Travel Planning Guidance, as follows:
- i Section 2: Planning policy guidance
  - i Section 3: Accessibility and existing conditions
  - i Section 4: Travel demand
  - i Section 5: Objectives and targets
  - i Section 6: Travel Plan strategy
  - i Section 7: Travel Plan measures
  - i Section 8: Monitoring and review

## 2 POLICY CONTEXT

---

### 2.1 INTRODUCTION

- 2.1.1. The national and local transport policies relevant to this development are well documented and this section does not seek to replicate them. Instead, the key themes in the relevant national and local policies are summarised briefly in turn, and where relevant, policies which relate directly to the development are addressed.

### 2.2 NATIONAL POLICY

#### National Planning Policy Framework, 2019

- 2.2.1. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 2.2.2. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, (so that opportunities can be taken to secure net gains across each of the different objectives):
- i An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
  - i A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
  - i An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.2.3. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- i The potential impacts of development on transport networks can be addressed;
  - i Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated.
  - i Opportunities to promote walking, cycling and public transport use are identified and pursued.
  - i The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

- i Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

#### 2.2.4. Planning policies should:

- i Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.
- i Be prepared with the active involvement of local highway authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.
- i Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.
- i Provide for high quality walking and cycling networks and supporting facilities such as cycle parking, (drawing on Local Cycling and Walking Infrastructure Plans).
- i Provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.

2.2.5. If setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

2.2.6. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

#### 2.2.7. Applications for development should:

- i Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.



- i Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
- i Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.
- i Allow for the efficient delivery of goods, and access by service and emergency vehicles.
- i Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

### National Planning Practice Guidance, 2019

- 2.2.8. The National Planning Practice Guidance was published in 2012 and revised in 2019, offering updated and revised guidance on planning where necessary.
- 2.2.9. The online version allows stakeholders to be altered in real time when future amendments to individual policies are made, thereby ensuring that the most up-to-date guidance documents are available. The NPPG provides additional guidance to supplement the planning policies contained in the NPPF.
- 2.2.10. The NPPG provides clarity on the role, function and structure of the Transport Assessments and Travel Plans:

*Transport Assessments and Statements are ways of assessing the potential transport impacts of developments and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans.*

- 2.2.11. Travel Plans, Transport Assessments and Statements can positively contribute to:
  - i Encouraging sustainable travel.
  - i Lessening traffic generation and its detrimental impacts.
  - i Reducing carbon emissions and climate impacts.
  - i Creating accessible, connected, inclusive communities.
  - i Improving health outcomes and quality of life.
  - i Improving road safety.
  - i Reducing the need for new development to increase existing road capacity or provide new roads.
- 2.2.12. They support national planning policy which sets out that planning should actively manage patterns of growth in order to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

### Good Practice Guidelines: Delivering Travel Plans through the planning process (DfT), 2014

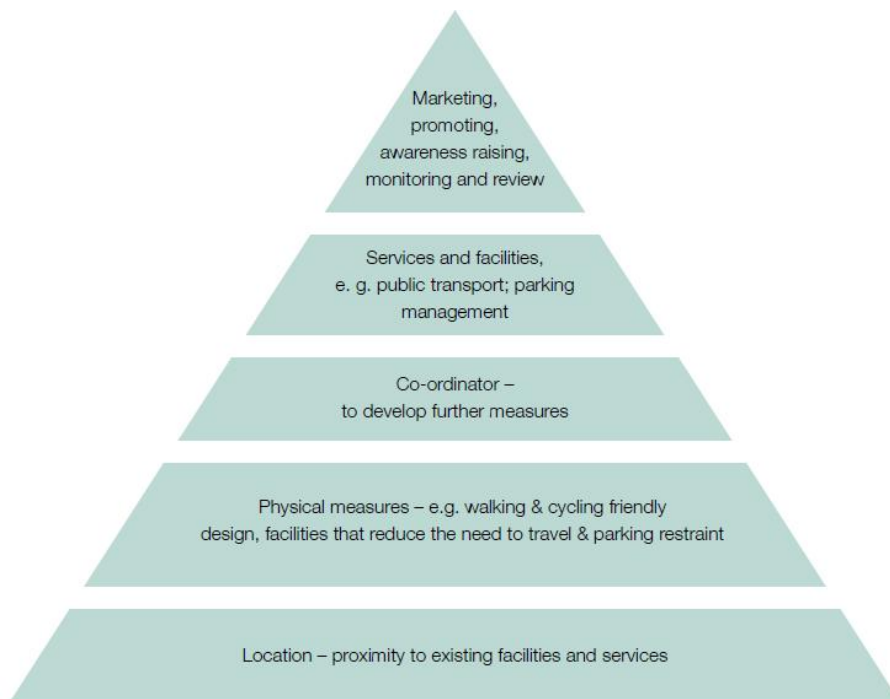
- 2.2.13. The DfT guidelines are intended to assist all stakeholders in determining when a Travel Plan is required, how it should be prepared and what it should contain within the context of an integrated planning and transport process. The guidelines also set out how Travel Plans should be evaluated, secured, implemented, monitored and managed in the longer term as part of this process. Travel Plans are important for major new developments in order to:
  - i “Support increased choice of travel modes.

- i Promote and achieve access by sustainable modes.
- i Respond to the growing concern about the environment, congestion, pollution and poverty of access.
- i Promote a partnership between the authority and the developer in creating and shaping 'place'."

2.2.14. The document recognises that it can be helpful to view a Travel Plan for a new development as a pyramid of measures and actions, which is constructed from the ground up, with each new layer building on the last all set within the context of the outcomes sought. This Travel Plan Pyramid is shown in **Figure 2-1**.

2.2.15. The DfT's Travel Plan Pyramid helps demonstrate how successful plans are built on the firm foundations of a good location and site design. Additional hard and soft measures should be integrated into the design, marketing and occupation of the site. In addition, parking restraint is often crucial to the success of the plan in reducing car use.

**Figure 2-1: Travel Plan pyramid**





## 2.3 REGIONAL POLICY

### Draft New London Plan, 2019

- 2.3.1. A draft New London Plan was issued in December 2017 and revised in 2018 and again in July 2019. In the meantime the current 2016 London Plan remains adopted. The draft New London Plan provides useful context for the direction of future policy although no material weight is attached to its policies at this stage.
- 2.3.2. Policy T2 relates to Healthy Streets and seeks development that delivers patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. The Healthy Streets approach recognises the importance of promoting and facilitating active modes of travel by making developments permeable and highly connected by foot and cycle with reduced vehicle dominance.
- 2.3.3. Policy T4 identifies that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Travel plans are noted as being able to help reduce negative impacts and bring about positive outcomes and are required in accordance with relevant Transport for London guidance.
- 2.3.4. Policy T5 sets out that development should encourage cycling and provides new cycle parking standards. Cycle parking and cycle parking areas should allow easy access and provide facilities for disabled cyclists. In places of employment, supporting facilities are recommended, including changing rooms, maintenance facilities, lockers and shower facilities (at least one per ten long-stay spaces is recommended).

### The London Plan, 2016

- 2.3.5. The London Plan was initially published in July 2011 with subsequent alterations since adopted; Revised Early Minor Alterations to the London Plan in October 2013, Further Alterations to the London Plan (FALP) in March 2015 and Minor Alterations to the London Plan in March 2016 with a fix version in January 2017.
- 2.3.6. The London Plan sets out to ensure that London's transport is easy, safe and convenient for everyone and encourages cycling, walking and use of electric vehicles.
- 2.3.7. Policy 6.1 stresses the importance of closer integration of transport and development and hopes to encourage this by (inter alia):
  - i "Encouraging patterns of development that reduce the need to travel, especially by car.
  - i Seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand.
  - i Supporting development that generates high levels of trips only at locations with high levels of public transport accessibility, either currently or via committed, funded improvements.
  - i Improving interchange between different forms of transport, particularly around major rail and underground stations, especially where this will enhance connectivity in outer London.
  - i Facilitating the efficient distribution of freight whilst minimising its impacts on the transport network.
  - i Supporting measures that encourage shifts to more sustainable modes and appropriate demand management.

- i Promoting greater use of low carbon technology so that CO2 and other contributors to global warming are reduced.
- i Promoting walking by ensuring an improved urban realm.
- i Seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable.”

2.3.8. Policy 6.3 states that: “workplace and / or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with the relevant TfL guidance”.

#### **TfL Travel Planning Guidance, 2013**

2.3.9. In November 2013 TfL published a guidance document to combine and simplify the previous Travel Plan document ‘Travel Planning for New Development in London: Incorporating Deliveries and Servicing’ (January 2012).

2.3.10. One of the purposes of the guidance is to ensure that deliveries and servicing are taken into account from the earliest stage in the planning process. However, the document recognises that the level of detail provided in a Travel Plan about goods / servicing aspects will depend on the nature and scale of the development.

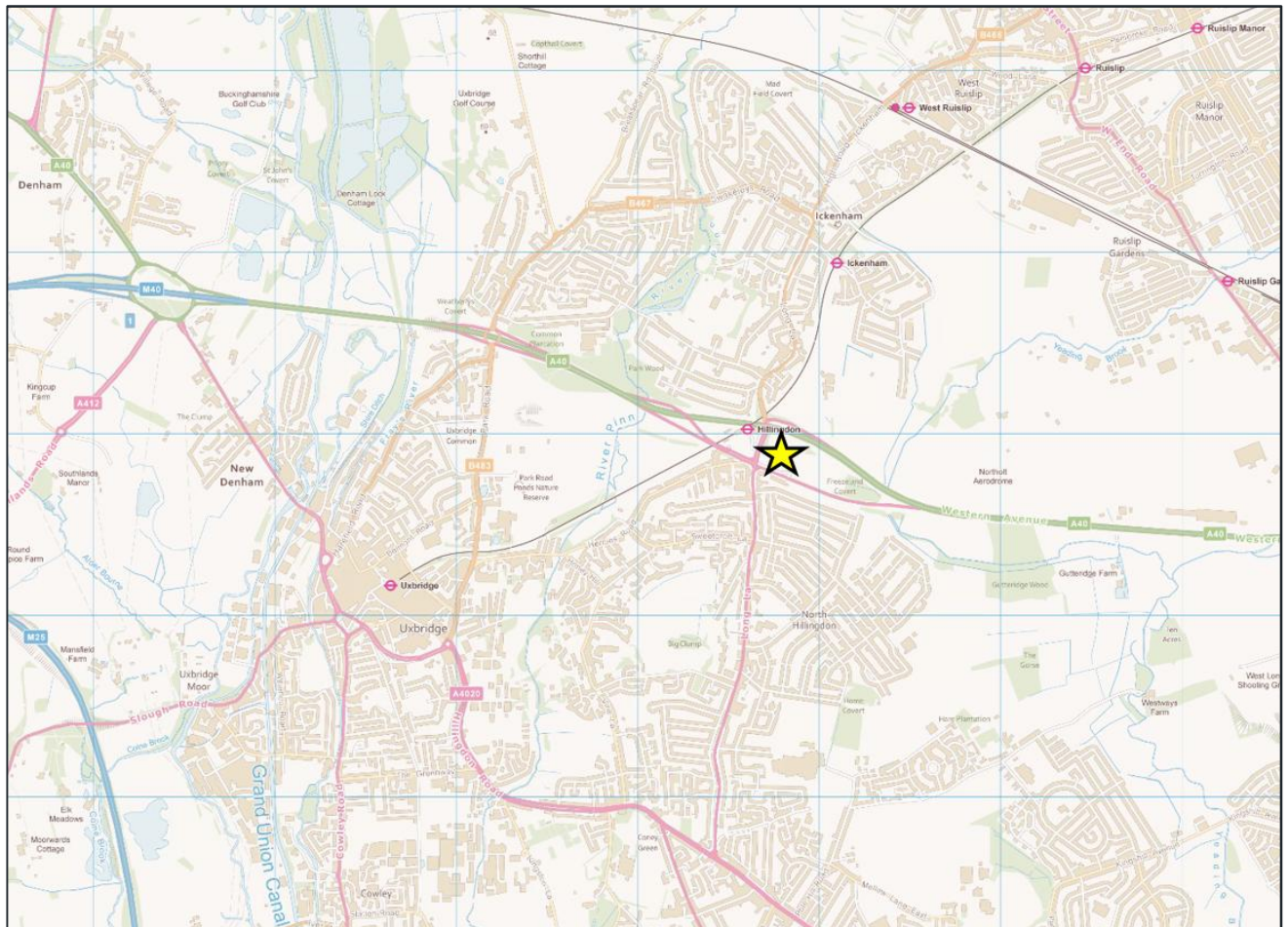
2.3.11. The guidance document sets out the core elements of a Travel Plan that are deemed essential. The essential elements are as follows: objectives, targets, measures, management, action plan, securing, and monitoring and review.

## 3 BASELINE CONDITIONS

### 3.1 INTRODUCTION

- 3.1.1. This section details the existing transport characteristics and accessibility of the site in terms of highways, public transport, walking and cycling.
- 3.1.2. The site comprises 2.53 hectares of land and is currently a vacant brown field site that was formerly occupied by the Master Brewer Motel and Public House, as well as associated buildings.
- 3.1.3. The development is an 'island' site located between the A40 Western Avenue and the Hillingdon Circus junction, as shown by **Figure 3-1**. The site is bounded to the north and east by the A40 Western Avenue, to the south by Freezeland Way, and to the west by the A437 Long Lane.

**Figure 3-1: Site location**

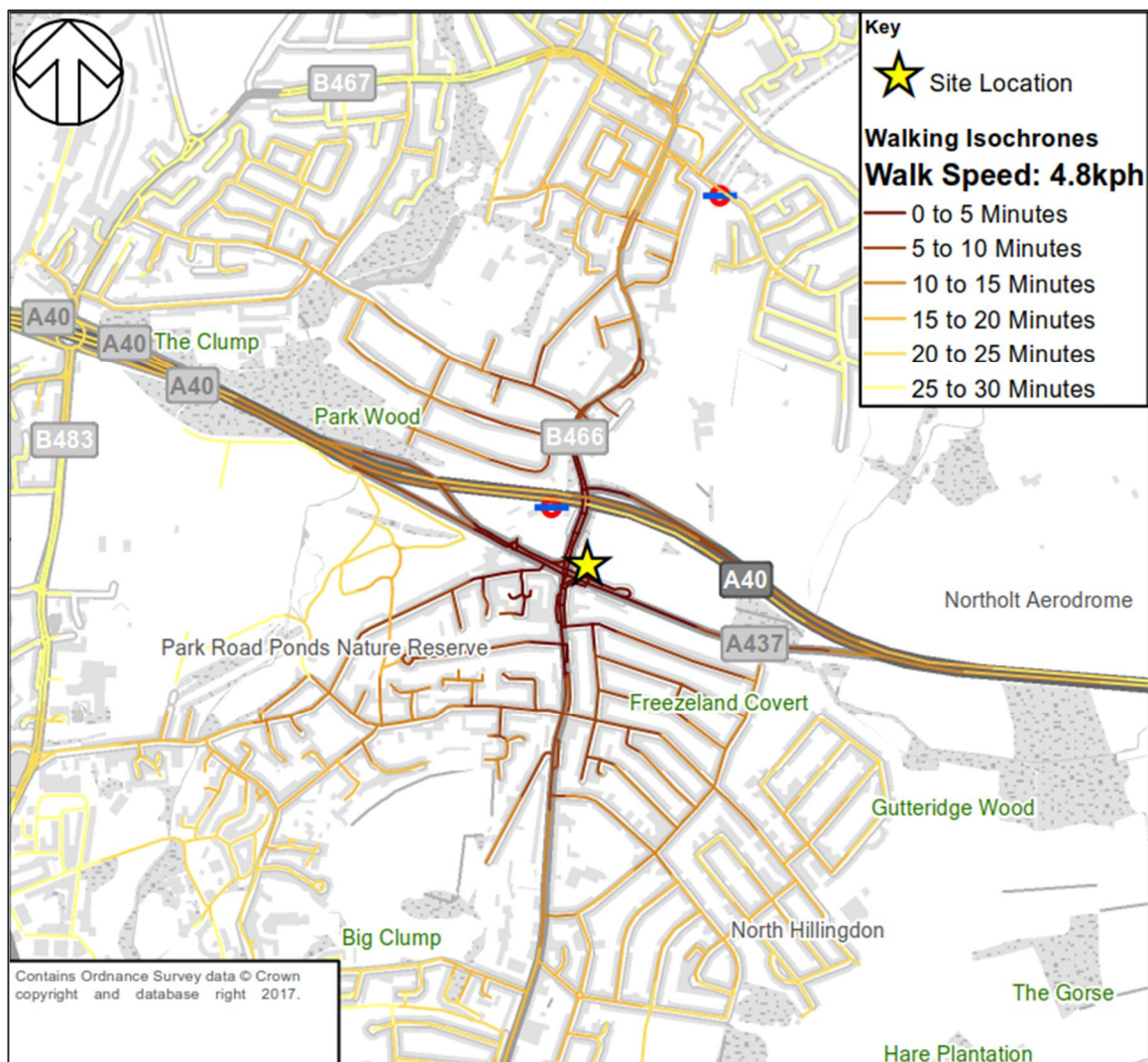




## 3.2 PEDESTRIAN ACCESSIBILITY

- 3.2.1. Though the development site is surrounded by busy roads on three sides, a network of well-lit footways border the site. These provide connections to the local amenities and facilities to the south of Hillingdon Circus as well as Hillingdon Underground Station. All arms of Hillingdon Circus have controlled pedestrian crossing points, allowing safe movements across the junction. All pavements in proximity to the site are at least 2 metres wide and are in good condition.
- 3.2.2. The walking isochrones displayed in **Figure 3-2** show 0-30 minute catchment for walking access. The isochrones assume a speed of approximately 4.8km/hr and demonstrate that the site is accessible to a large number of local facilities, amenities and an extensive public transport network. Uxbridge town centre, Ickenham and the A437 can all be reached within a 30 minute journey.

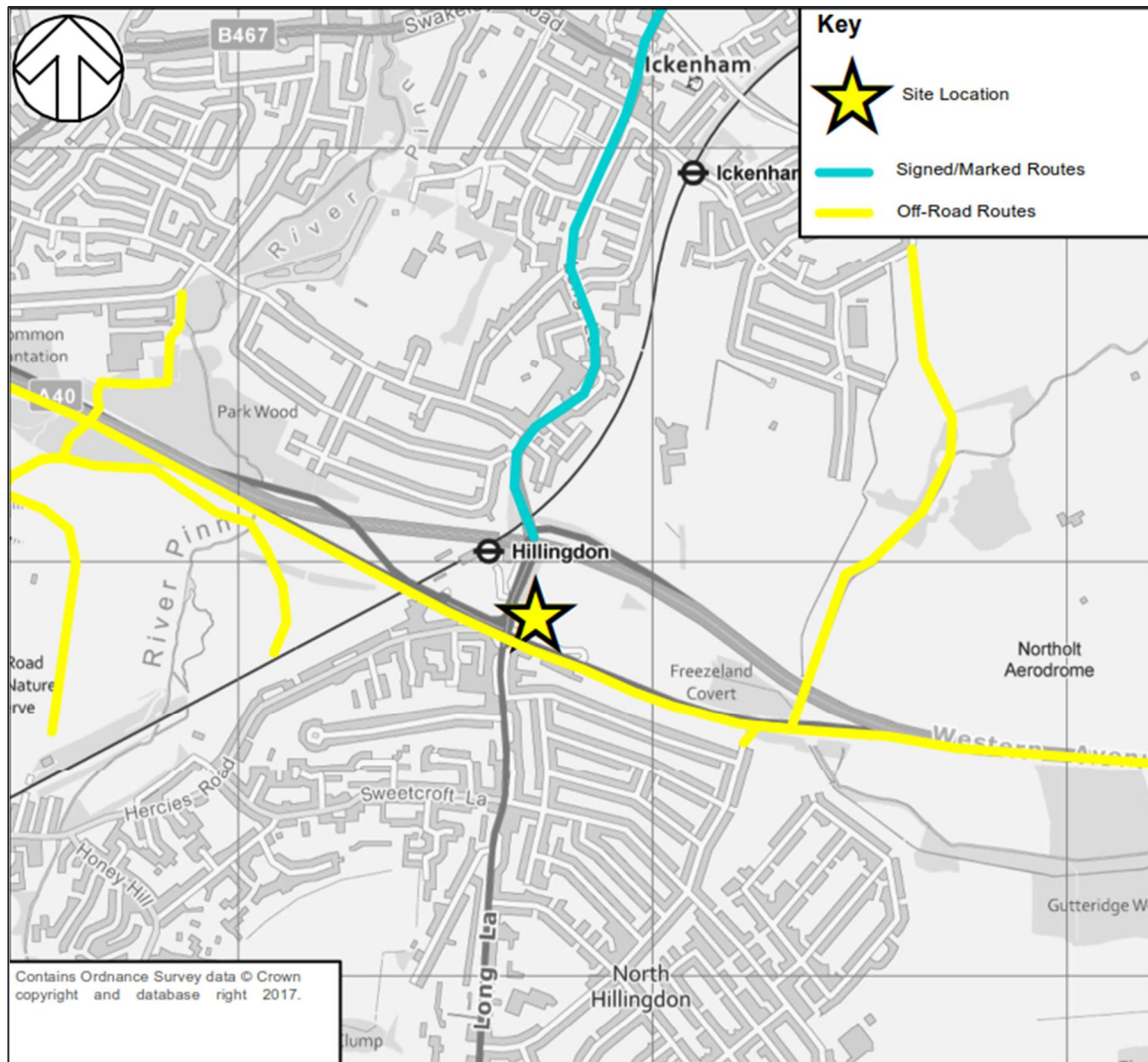
**Figure 3-2: Walking isochrones**



### 3.3 CYCLE ACCESSIBILITY

- 3.3.1. Though there are no London Cycle Network (LCN) routes in the direct vicinity of the site, there is a segregated cycle route that runs along the A40 Western Avenue from the Polish War Memorial Roundabout. Here the route switches carriageways, and continues east along the A40 Western Avenue until it reaches White City. At various points along this route there are opportunities to join LCN route 6 and other local routes towards destinations such as Southall, Wembley and Central London.
- 3.3.2. The off-road cycle route runs along the A40 westbound exit slip towards Freezeland Way, and continues past the site on to Western Avenue to the west of Hillingdon Circus. From here it connects to other local routes and trails around Hillingdon Athletics Stadium, offering the opportunity for recreational cycling.
- 3.3.3. To the west of the site, an on-road cycle lane heads northbound along Long Lane towards Ickenham. **Figure 3-3** shows the local cycle routes in the area.

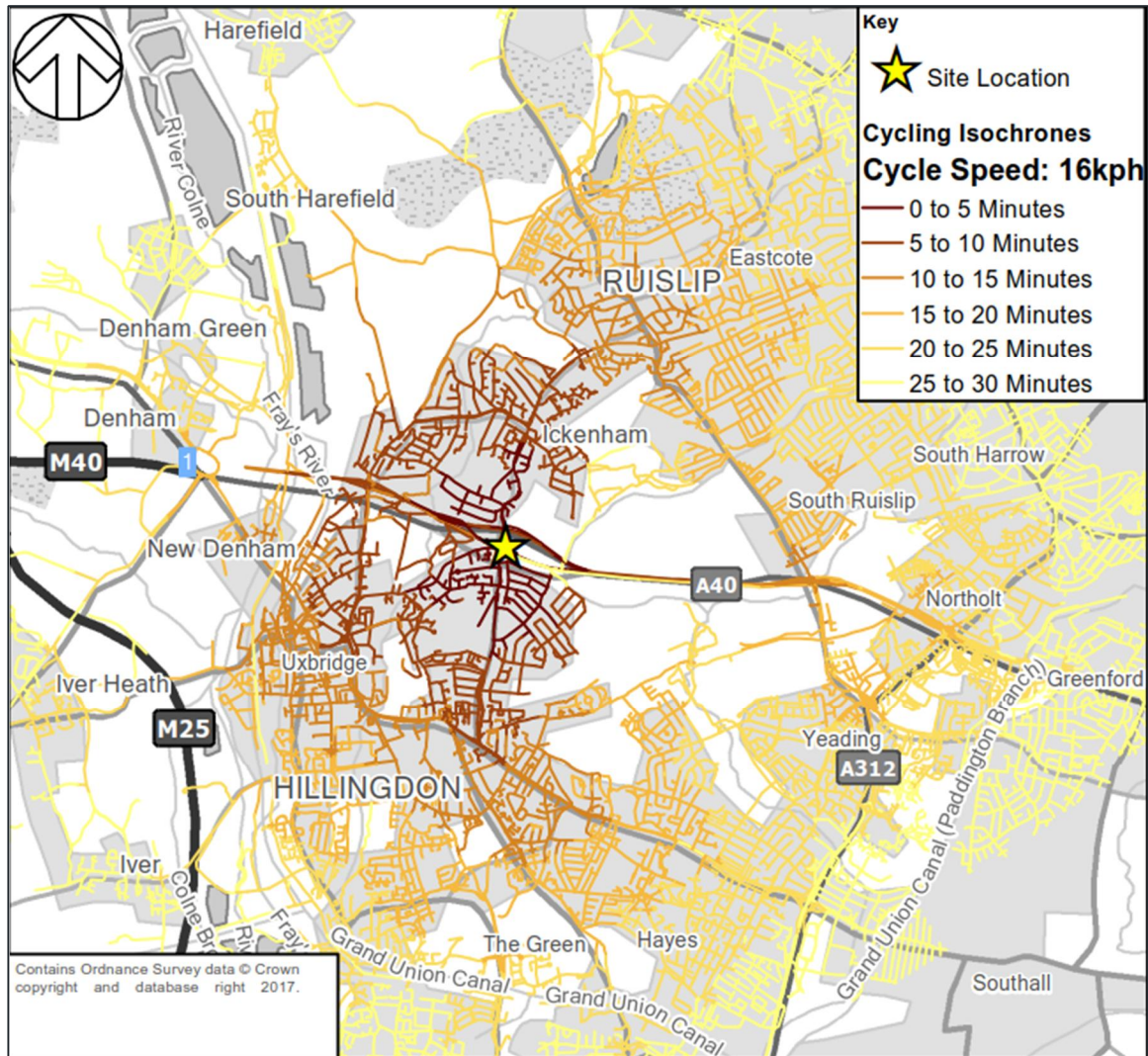
**Figure 3-3: Local cycle routes**





- 3.3.4. The cycling isochrones displayed in **Figure 3-4** show 0-30 minute catchment for cycle access. The isochrones assume a speed of approximately 16km/hr and demonstrate that it is possible to cycle from the site to Uxbridge and Ickenham within 5-10 minutes, and various destinations around Greater London including Heathrow Airport, Ealing and Harrow within 30 minutes.

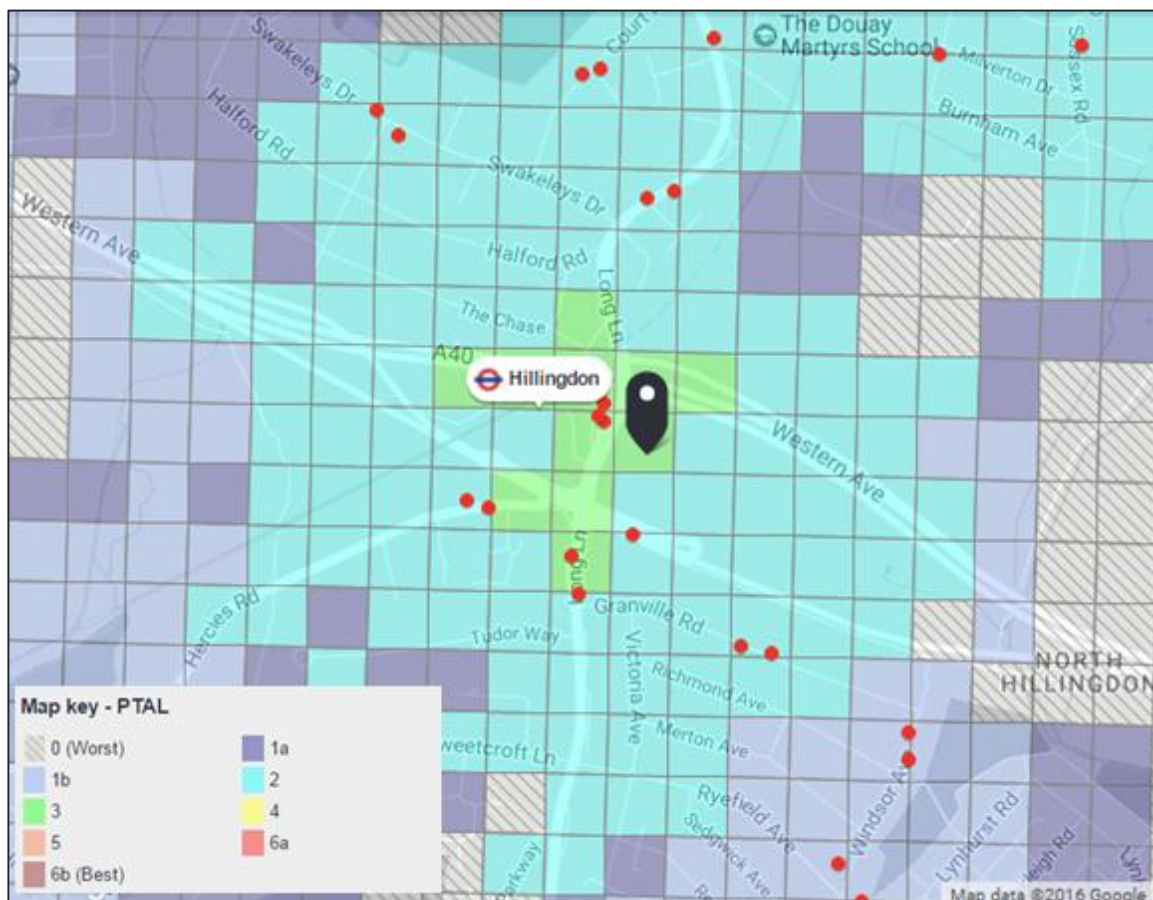
**Figure 3-4: Cycling isochrones**



## 3.4 PUBLIC TRANSPORT ACCESSIBILITY

- 3.4.1. The PTAL methodology has been adopted by TfL as a means by which to quantify and compare accessibility to public transport services for given sites. It takes into account the time taken to access the public transport network, including:
- The walk time to various public transport services.
  - The average waiting time for each service.
  - The reliability of each service.
- 3.4.2. The methodology is based on a walk speed of 4.8kph and considers railway stations within a 12 minute walk (960m) of a site and bus stops within an 8 minute walk (640m). The PTAL assessment is undertaken using the AM peak hour operating patterns of existing services.
- 3.4.3. An Equivalent Doorstep Frequency (EDF) is calculated for each of the public transport services accessible from the site based on the criteria described above. These individual EDF values are weighted to provide an accessibility index (AI) value for each service accessible from the site. The sum of the AIs for each mode are aggregated to provide a single measure of accessibility.
- 3.4.4. The PTAL level is 3, as shown by **Figure 3-5** indicating that there is a moderate level of accessibility to public transport to / from the proposed development.

**Figure 3-5: PTAL map**



### London Underground



- 3.4.5. The site is located adjacent to Hillingdon Underground Station, which can be reached by crossing Hillingdon Circus and then walking approximately 200m north along Long Lane. The station is managed by London Underground Limited (LUL) and is situated on both the Metropolitan and Piccadilly lines.
- 3.4.6. Hillingdon benefits from being located one stop from the end of the Piccadilly and Metropolitan lines, meaning passengers are always able to board trains towards Central London during the peak hours, the majority of which get seats for their journey.
- 3.4.7. Combined, the two lines provide 17 trains per hour in the peak hours towards the centre of London and 16 trains per hour to Uxbridge. Tube frequency at Hillingdon is broken down further in **Table 3-1**.

**Table 3-1: London Underground service frequencies**

Peak / off-peak	Metropolitan line		Piccadilly line	
	Trains per hour (WB)	Trains per hour (EB)	Trains per hour (WB)	Trains per hour (EB)
Morning	10 – Uxbridge	2 – Aldgate (fast) 4 – Aldgate 3 – Baker Street	7 – Uxbridge	8 – Cockfosters
Evening	9 – Uxbridge	7 – Aldgate 1 – Baker Street	8 – Uxbridge	4 – Cockfosters
Off-peak	8 – Uxbridge	7 – Aldgate 1 – Baker Street	3 – Uxbridge	3 – Cockfosters

### Buses

- 3.4.8. Bus stops providing access to local bus services are located within Hillingdon LUL Station drop-off area and to the south of Hillingdon Circus on Long Lane (A437). In addition, regional services between central London and Oxford operated by the Oxford Tube and Oxford Bus Company (X90) stop at Hillingdon LUL Station (London-bound) and to the south of the site on Freezeland Way (Oxford-bound).
- 3.4.9. Service frequencies for buses in the immediate vicinity of the site, including the forthcoming 278 route, are detailed in **Table 3-2**.

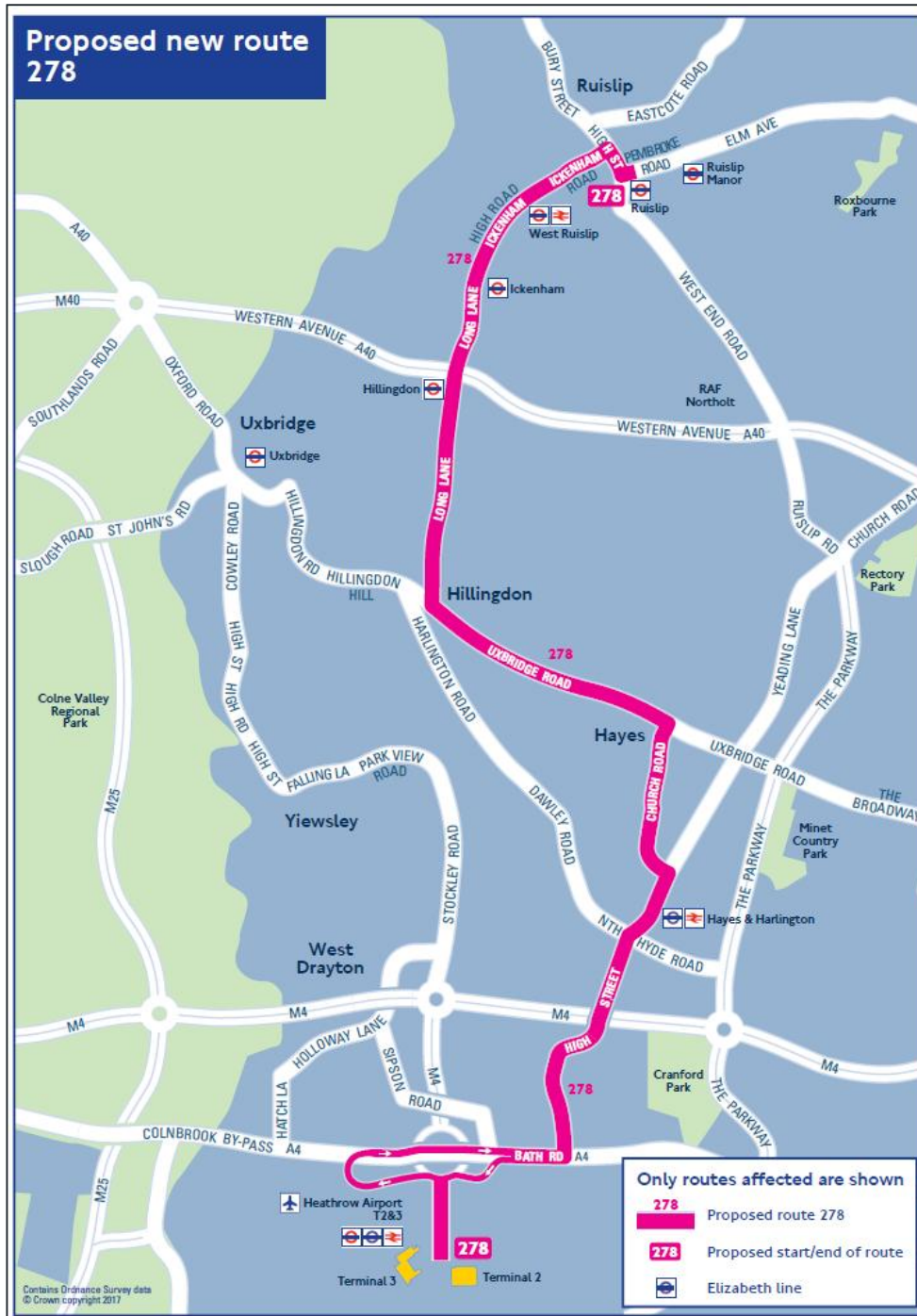
**Table 3-2: Bus service frequencies**

Service No.	Route	Weekday		Saturday		Sunday	
		Freq. (mins)	First Last Service /	Freq. (mins)	First Last Service /	Freq. (mins)	First Last Service /
U2	Uxbridge Underground – Brunel University	8	05:22 / 00:22	8	05:22 / 00:22	20	06:18 / 00:22
U10	Uxbridge Underground – Ruislip	60	07:01 / 19:02	60	06:59 / 19:03	N/A	No Service
X90	Oxford – London Victoria	15	05:15 / 03:10	15	05:15 / 03:10	15	05:15 / 03:10
Oxford Tube	Oxford – London Victoria	10	24 hour service	10	24 hour service	12	24 hour service
278	Ruislip – Heathrow	15	TBC	15	TBC	15	TBC

### 278 bus route

- 3.4.10. The 278 bus service is anticipated to come forward in December 2019, which will run directly past the site along Long Lane. The service will run from Ruislip town centre along Long Lane, past West Ruislip, Ickenham and Hillingdon Underground Stations, to Uxbridge Road. From here, it will continue towards Hayes, including Hayes and Harlington Station, which will be situated on the Crossrail line. The route will then head to Heathrow Airport Terminals 2 and 3, where it will terminate. The route is shown in **Figure 3-6**.

**Figure 3-6: 278 bus route**



- 3.4.11. The service will be operated by TfL, and the developer will provide a financial contribution towards the service operation. The bus is anticipated to operate with a frequency of four services per hour in both directions from conception. The 278 bus route will provide a much needed north-south public transport link along Long Lane.
- 3.4.12. A manual PTAL calculation has been undertaken, which has used updated service frequencies on the London Underground from Hillingdon Circus, as well as including the propose 278 bus route. The bus stop on the south side of Freezeland Way, serving the X90 and Oxford Tube routes, has also been

included. Adding the 278, X90 and Oxford Tube services, as well as amending service frequencies for the London Underground at Hillingdon Station, boost the site's PTAL to a 4, indicating a good level of accessibility.

### **3.5 HIGHWAY ACCESSIBILITY**

- 3.5.1. The site is well connected by road to key destinations such as Uxbridge, Central London, Heathrow Airport, the M25 and the M40.
- 3.5.2. The site is immediately surrounded by roads to the north, west and south of the site. To the north lies the A40 Western Avenue, a major traffic route that is part of the Transport for London Road Network (TLRN) and red route network. This road is motorway standard and is grade separated from the development site.
- 3.5.3. The A437 Long Lane is situated to the west of the site, a two-lane dual carriageway providing links towards Ruislip in the north and Uxbridge Road in the south. This road provides the north-south link through Hillingdon Circus. To the south of this junction it turns into a single carriageway road. The road is subject to a 30mph speed restriction throughout.
- 3.5.4. Running parallel to A437 Long Lane on both sides is a single lane carriageway with one parking lane that provides direct access to the shop frontages along the north end of Long Lane.
- 3.5.5. Freezeland Way and Western Avenue provide the eastern and western arms of Hillingdon Circus respectively. Both roads are two-lane dual carriageways. Western Avenue provides access and egress from the A40 in the west, whilst Freezeland Way provides only egress from the A40 in the east. The eastbound carriageway of Freezeland Way loops round to meet the westbound carriageway on its way to Hillingdon Circus.
- 3.5.6. Hillingdon Circus is a signal controlled yellow box junction with four arms, Western Avenue to the west, Freezeland Way to the east, and the A437 Long Lane to both the north and the south. Pedestrian and cycle crossing facilities are situated on all arms of the junction.
- 3.5.7. Approximately 30m west of Hillingdon Circus, a priority junction connects the westbound carriageway of Western Avenue to Hercies Road. This single carriageway road then heads south and provides access towards Uxbridge town centre.

## 4 TRAVEL DEMAND

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### 4.1 SITE MANAGEMENT

- 4.1.1. Given that the proposed development has not yet been constructed it is not possible to undertake site monitoring to establish baseline travel characteristics at this stage.
- 4.1.2. The travel characteristics of occupants of the proposed development will however be monitored on a regular basis once the development is occupied. Travel surveys will be undertaken for the residential land-use in accordance with the iTRACE monitoring system that feeds into the TRICS survey database.
- 4.1.3. This survey will accurately identify the sites travel characteristics and the results will be known as Year 0. The initial travel survey will be coordinated and publicised by the Travel Plan coordinator (TPC).
- 4.1.4. The format of the travel survey(s) will be agreed between the TPC and LBH prior to the survey being undertaken. It is envisaged that this will be a count of all trips by all modes at each access to the development for one weekday at an agreed date between the hours of 07:00 – 22:00. The travel surveys will be conducted by a TRICS approved survey company. After the initial travel survey, it is anticipated that the travel surveys will be undertaken during the same time of year as the previous travel surveys to ensure it provides a like-for-like comparison.
- 4.1.5. Further monitoring will be commissioned by the TPC and take into account cycle parking space usage and vehicle parking space usage over the period of one week at the same time as the previous travel surveys – this will help inform future improvements required to further encourage sustainable travel.

### 4.2 BASELINE TRAVEL DEMAND

- 4.2.1. In the absence of existing travel survey data at the site modal shares have been determined from the trip generation analysis and supplementary surveys derived within the Transport Assessment produced submitted alongside this application.
- 4.2.2. The trip generation forecast for the residential land use is presented in turn below, with full details of their derivation being provided within the Transport Assessment.
- 4.2.3. The residential trip generation is set out in **Table 4-1**. This trip generation exercise is based upon sites in the TRICS database and census mode of travel data.

**Table 4-1: Forecast travel demand**

Mode	AM Peak: 08:00-09:00			PM Peak 17:00-18:00		
	In	Out	Total	In	Out	Total
Underground	6	42	48	12	11	23
Bus	11	77	88	40	13	53
Motorcycle	1	3	4	2	1	3
Car Driver	18	60	78	41	20	61
Car Passenger	15	30	45	27	15	42
Bicycle	3	14	17	6	2	8
Foot	34	90	124	36	43	79
<b>Total</b>	<b>88</b>	<b>316</b>	<b>404</b>	<b>164</b>	<b>105</b>	<b>269</b>

## 4.3 INITIAL TRAVEL SURVEY

- 4.3.1. The initial travel survey for the development will be undertaken upon 50% occupation and provide an accurate breakdown of travel modes, to identify performance against predictions and to inform any necessary changes to the Travel Plan.
- 4.3.2. The results will include residents, deliveries as well as visitors.

## 5 OBJECTIVES AND TARGETS

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### 5.1 OBJECTIVES

- 5.1.1. The objectives of the TP are to develop a set of mechanisms, initiatives and targets which seek to reduce the impact of travel on the environment arising from the site. The TP aims to reduce car dependency, particularly for single car occupancy trips and promote the use of more sustainable modes of transport.
- 5.1.2. The over-arching aim of the Travel Plan is to:
- ‘Ensure that residents and visitors have the opportunity to travel to and from the site in the most sustainable manner appropriate for their journey’.*
- 5.1.3. In addition to the TP aim, the following objectives have been identified:
- ❑ To establish sustainable travel principles for the development as a whole.
  - ❑ To facilitate tailored travel information.
  - ❑ To encourage healthy and active travel
  - ❑ To reduce local congestion and associated externalities
  - ❑ To minimise single occupancy vehicle and taxi trips
  - ❑ To support car free lifestyles
  - ❑ To raise awareness of sustainable modes of transport available for residents travelling to and from the site.
- 5.1.4. It is critical that the Travel Plan mechanism is an evolving process. Regular evaluation and if necessary, adaptation of implemented measures will increase the likelihood of the TP meeting its aims. It will also ensure that any shortcomings are identified and addressed at the earliest opportunity.

### 5.2 TARGETS

- 5.2.1. This section illustrates how the targets are linked to the objectives set out above. In accordance with TfL’s best practice guidance all targets identified are SMART (specific, measurable, achievable, realistic and time-bound). Targets are set to measure progress towards the main objectives over the first 5 years of the Travel Plan and will be revised after ‘Year 1’ if necessary.
- 5.2.2. Two types of targets have been identified. ‘Action’ type targets are defined within Appendix three of TfL’s guidance as ‘non-quantifiable actions that need to be achieved’ (e.g. appointing a TPC before occupation), whilst ‘Aim’ type targets are ‘quantifiable and relate to the degree of modal shift the plan is seeking to achieve or other outcomes’ (e.g. the date by which an increase in walk and cycle mode split will be achieved). The ‘action’ and ‘aim’ type targets for the site are set out in turn.

#### Action type targets

- ❑ Appoint TPC prior to first occupation.
- ❑ Produce a travel pack promoting alternative modes of transport and the key services provided through the Travel Plan.
- ❑ Undertake travel surveys in years one, three and five after 50% occupation.



### Aim type targets

- 5.2.3. The Travel Plan targets aim to measure the progress made towards achieving the Travel Plan objectives. Targets are generally based on achieving modal shift through reductions in car use, particularly with a single occupant, and increases in the use of sustainable modes such as cycling.
- 5.2.4. As a travel survey of the site has not yet been undertaken and baseline mode shares are estimated using census data, trip generation forecasts and supplementary survey data presented within the Transport Assessment (as detailed within **Section 4**). Given that a baseline travel survey is not available, it should be noted that the mode split targets specified within this section will be indicative and will therefore require refinement once the results of the initial Travel Survey have been reviewed. The initial travel survey will be undertaken upon 50% occupation of the residential units.
- 5.2.5. Targets will be reviewed throughout the life of the Travel Plan. Indicators will measure the progress towards targets, which for the most part will be ascertained from the main mode listed by residents of the Site in the iTRACE/ TRICS compliant monitoring surveys conducted when the buildings currently under construction are completed and occupied.
- 5.2.6. This Travel Plan recognises that it is not possible to set out accurate targets far in the future (beyond the next interim 2 year period). Given this, it should be acknowledged that the targets may change over time as results from on-going monitoring become available. This will be discussed and targets agreed with LBH travel planning officers.

### Residential mode share targets

- 5.2.7. The primary 'aim type' targets for the residential element have been derived relative to mode share identified from the baseline travel demand forecasts set out within **Section 4** (reproduced from the Transport Assessment).
- 5.2.8. Whilst the car driver journey to work mode split derived from the trip generation calculations within the Transport Assessment is considered to be sustainable and does not have a material impact upon the surrounding highway network, the following three primary aim type targets for the residential element of the scheme have been identified.
  - i **Reduction in car driver trips:** The Travel Plan will aim to reduce the residential car driver mode share during peak hours by 10%. The target has been informed by the availability of public transport in this accessible location, and is therefore considered achievable within a 5 year timeframe.
  - i **Increase in sustainable travel:** In accordance with the Mayor's aspirations for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041, the Travel Plan will aim to achieve an 80% mode share by modes other than car driver during the AM and PM peak hours. This target is considered achievable within a 5 year timeframe.
  - i **Increase in cycling:** In accordance with the Mayor's aspirations to deliver an increase in cycling by 2026 relative to 2001 levels, the Travel Plan will encourage cycling as a sustainable mode of transport with the aim increasing the cycling mode share from a forecast level.
- 5.2.9. It is noted that increases in public transport mode share would also be forecast as part of delivering a mode shift away from private car usage. Whilst the location of the development and its accessibility to public transport services would be expected to encourage a natural modal shift towards these modes, further promotion of the availability of public transport services will be provided through the

production of a residential travel pack with targeted personalised journey planning being deployed in the event that the targets identified are not achieved.

#### **Interim targets**

- 5.2.10. It is proposed that the 'aim' type target will focus primarily on the reduction of car driver mode share relative to the baseline travel demand forecasts. This will naturally reflect in an increase in other sustainable modes of travel, such as by bus, London Underground or cycling.
- 5.2.11. The forecast target to be achieved over the five year duration of the Travel Plan is to achieve a 10% reduction in single occupancy vehicle trips compared to those recorded by the initial baseline survey. The Travel Plan will have a five year timeframe, unless otherwise agreed in writing with LBH.
- 5.2.12. The initial travel survey will be undertaken upon 50% occupation and the base updated accordingly.

## 6 TRAVEL PLAN STRATEGY

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### 6.1 TRAVEL PLAN COORDINATOR

- 6.1.1. A Travel Plan coordinator, (TPC) will be appointed to take responsibility for the development and management of the plan. The TPC will ensure that the adoption of the Travel Plan is effective and efficient, and will be included in all green leases for tenants.
- 6.1.2. The TPC role will be funded directly by Inland Homes from the commencement of the Travel Plan and until the completion of the Year 5 monitoring surveys. After this time, it is envisaged that the TPC role will be reduced but will include keeping public transport notice boards and other Travel Plan information up-to-date and relevant.
- 6.1.3. The responsibilities of the TPC can be summarised as:
- Giving a 'human face' to the Travel Plan – explaining its purpose and the opportunities on offer.
  - Helping establish and promote the individual measures in the plan.
  - Ensuring the structures for the on-going management of the plan are set up and running effectively.
  - Liaising with public transport operators and other service providers such as car club operators.
  - Overseeing the monitoring and reporting of the travel plan including liaising with LBH where appropriate.
  - Overseeing and monitoring the regular surveys and questionnaires, which will inform the on-going development of the plan.
  - The TPC will also undertake regular checks (monthly) of the information available on notice boards to ensure the content displayed is up to date.
  - Administration of the Travel Plan, which involves the maintenance of necessary paperwork, consultation and promotion. This ensures the plan remains up to date and provides current information to readers.
  - Measuring success and monitoring change.

### 6.2 MARKETING STRATEGY

- 6.2.1. It is recognised that a marketing and communication strategy is key to the success of the Travel Plan. The marketing strategy will aim to raise awareness of the key services and facilities implemented as part of the Travel Plan and disseminate travel information and notification of events and facilities provided.
- 6.2.2. Each residential unit will be provided with a branded Welcome Pack on first occupation. The welcome pack will include a summarised version of the Travel Plan along with information on public transport, the local walking and cycling network, contact details for taxi operators, and local Car Clubs.
- 6.2.3. Residents will, as a consequence, be made aware of the Travel Plan and of its branding, including the purpose and objectives of the Travel Plan, along with specific measures such as the cycle parking. In conjunction with the Welcome Pack, marketing activity will be undertaken at the point of sale (where possible). Sales staff in the Marketing Suite will be fully briefed on the Travel Plan.

## **6.3 SECURING THE TRAVEL PLAN AND FUNDING**

- 6.3.1. The provision of an approved travel plan in accordance with current TfL guidance together with the implementation of site wide 'action' type targets will be secured through planning condition for the development.
- 6.3.2. A commitment to the travel plan strategy for the site forms part of the commitment to implement the Residential Travel Plan to discharge conditions.

## 7 TRAVEL PLAN MEASURES

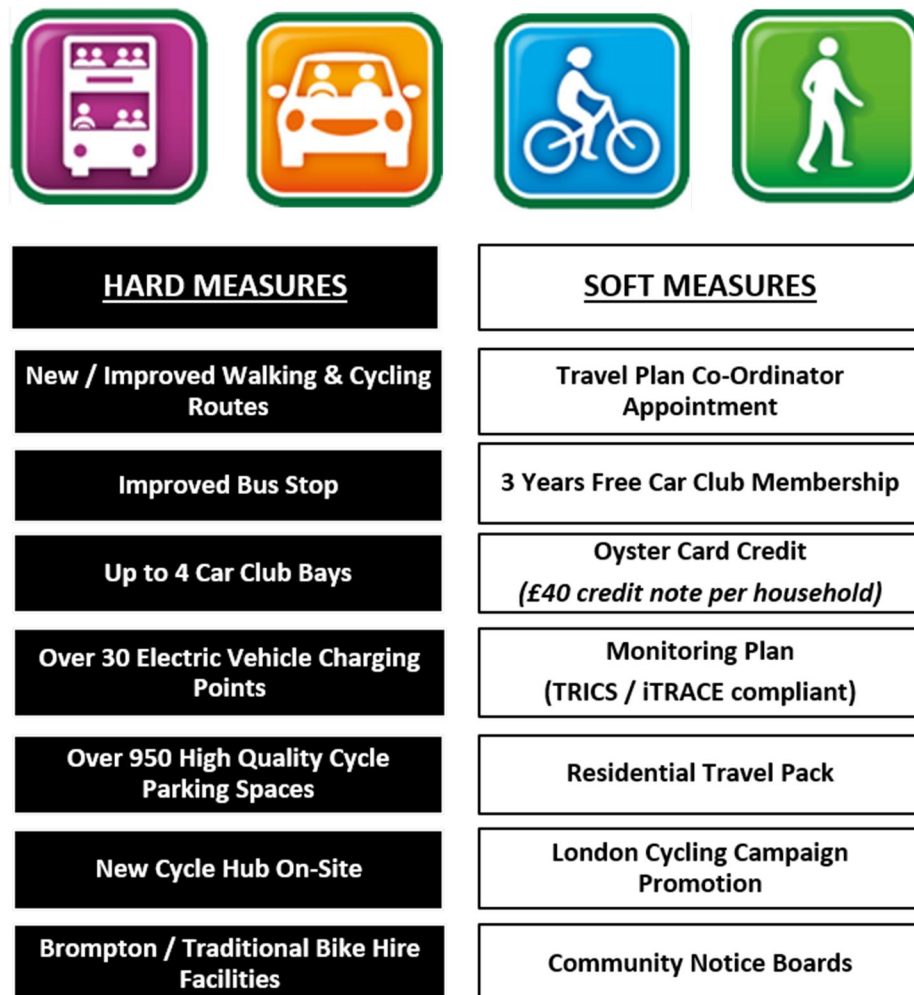
### 7.1 INTRODUCTION

7.1.1. This section outlines the ‘hard,’ (infrastructure) and ‘soft,’ (travel management) measures that have been implemented throughout the site to maximise sustainable travel behaviour. It outlines the overarching measures which have been implemented on site in order to achieve the objectives identified within **Section 5**. The measures have been grouped into two types as follows and considered in turn in the following sections:

- i ‘Hard’ engineering measures incorporated into the design of the development.
- i ‘Soft’ marketing and management measures which have been implemented as part of the development proposals to ensure that sustainable travel behaviour is maximized.

7.1.2. **Figure 7-1** details the ‘hard’ and ‘soft’ measures proposed.

**Figure 7-1: Travel Plan initiatives**



## 7.2 HARD MEASURES

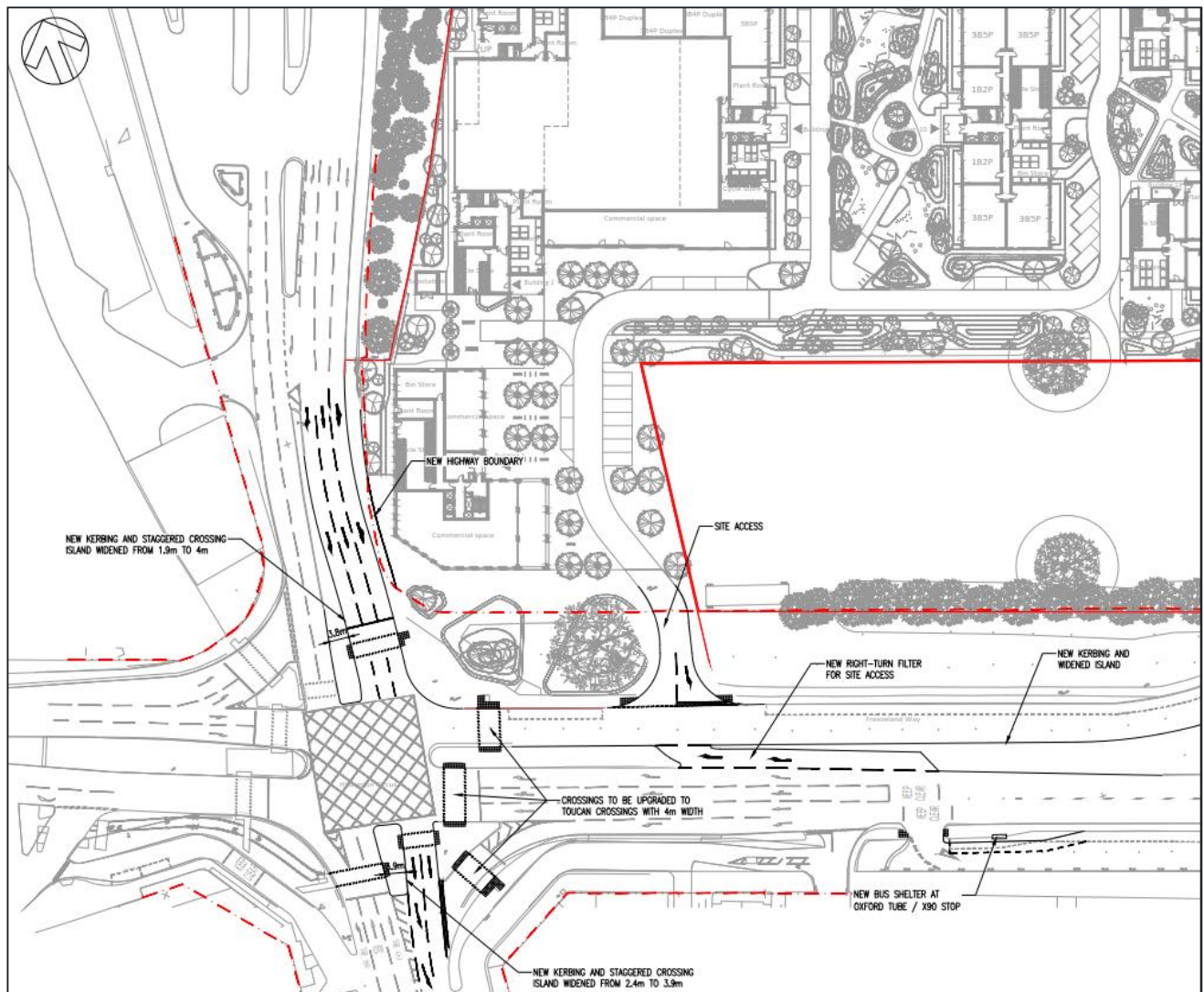
- 7.2.1. As mentioned above, 'Hard' measures refer to engineering measures incorporated into the design of the development to promote more sustainable travel. Many physical aspects of the development design will influence travel patterns from the outset. These 'hard' engineering measures are set out below.

### Off-site highway proposals

- 7.2.2. The entrance to the site takes the form of a 'gateway', with landscaped public realm leading towards the retail units and residential blocks. It will act as an extension of the high street, providing good pedestrian connections to both Hillingdon Underground Station and the shops and services along Long Lane.
- 7.2.3. Pedestrian and cycle access will be provided along the main desire lines, such as from Long Lane north towards the cycle path along the southern side of Freezeland Way. Adjustments will be made along the northern, eastern and southern pedestrian crossings of the Hillingdon Circus junction. The pedestrian islands will be widened, enhancing safety and ease of access for pedestrians and cyclists moving across the junction. The proposals include widening the central staggered pedestrian islands on Long Lane North from 1.9m to 4m and on Long Lane South from 2.4m to 3.9m. It is also proposed to widen the eastern staggered crossing island from 3.9m to 4.7m, and the eastern crossing will be upgraded to a toucan crossing, providing improved connections by bike towards the cycle path along the south side of Freezeland Way. The right turn filter along Freezeland Way westbound will also be extended, as recommended in the Road Safety Audit. It is presumed that these works would form part of the off-site highways proposals to be delivered prior to occupation as part of the Section 278 works.
- 7.2.4. In addition, the X90 / Oxford Tube bus stop along Freezeland Way will be widened to allow for a suitable bus shelter. Dropped kerbs will also be provided to allow for mobility impaired access.
- 7.2.5. These improvements are shown in shown in **Figure 7-2**, and will help connect to convenient routes towards local facilities and the public transport service access points within the immediate surrounding area.



**Figure 7-2: Off-site highway improvements**



## Public transport

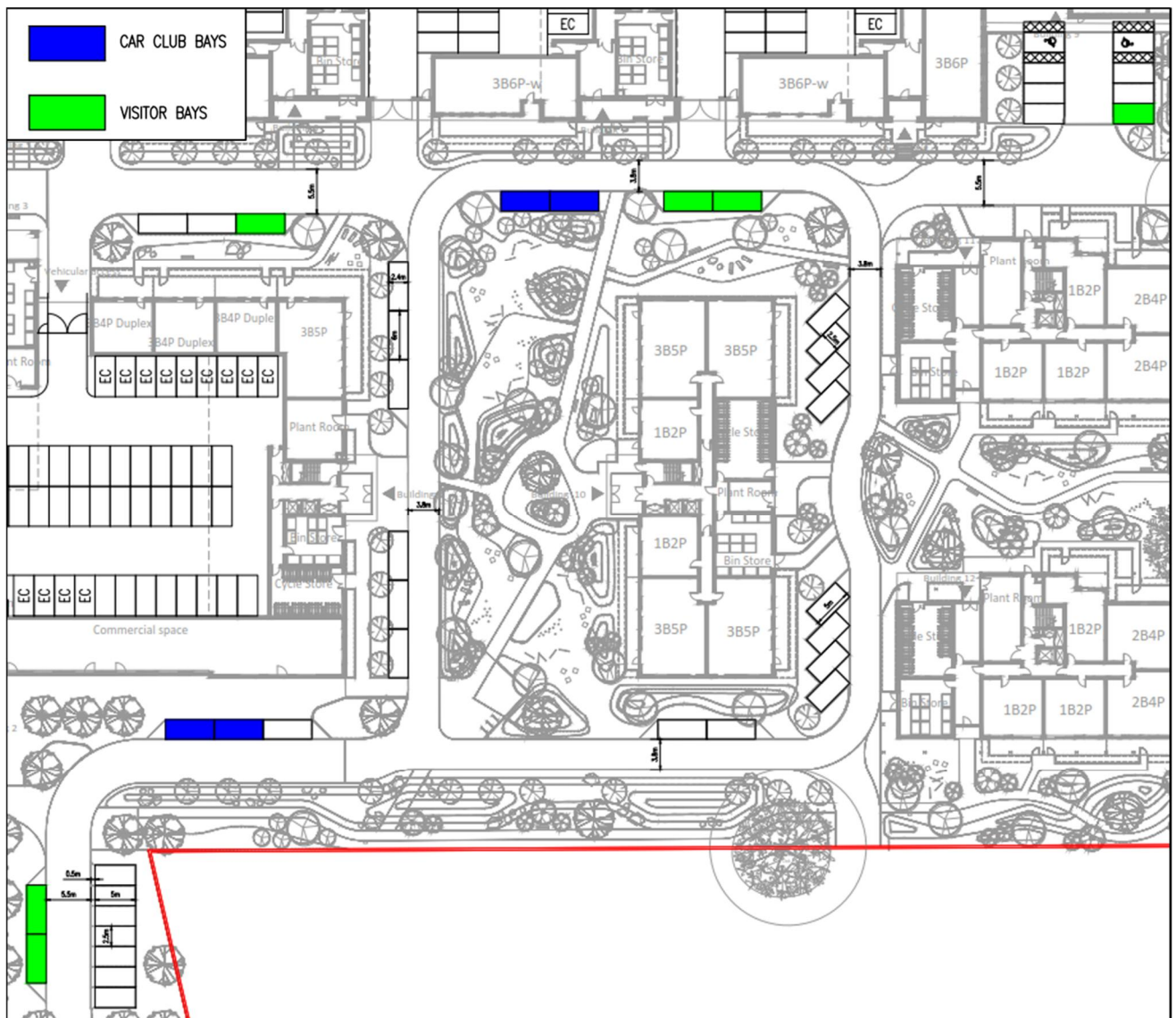
- 7.2.6. It is proposed that the developer will provide a financial contribution towards the service operation for the forthcoming 278 bus route. The bus is anticipated to operate with a frequency of four services per hour in both directions from conception. The 278 bus route will provide a much needed north-south public transport link along Long Lane. Bus contributions will significantly enhance local residents' access to local bus services and will enhance the feeling of a focal transport 'hub' at Hillingdon Underground Station on the edge of the development. The service will be highly accessible to those living and working across the site and local area.



## Car club

- 7.2.7. Initial discussions with car club operators ZipCar and Enterprise suggest that the development at full build out could support up to 4 car club cars.
- 7.2.8. It is proposed that four car club cars are provided within the site to support the development. It is envisaged that one car will be provided upon initial occupancy, with usage monitored and reported prior to implementation of a second vehicle. ZipCar have a threshold of 45% utilisation before they look to increase the number of car club vehicles on site. Enterprise adopts a lower threshold of approximately 30% utilisation. This monitoring exercise would help to inform the Travel Plan targets and also the number of spaces to be provided for future phases and help ensure that the number of car club vehicles on site meets the demand.
- 7.2.9. **Figure 7-3** shows the internal site road from the site access, including the proposed car club bay locations in blue. This location will maximise exposure and ensures the bays are conveniently located regardless of which block future residents reside in.

**Figure 7-3: Indicative car club bay locations**



7.2.10. The chosen car club provider will be marketed at the development through:

- i Bespoke marketing material.
- i Advertisement within the development.
- i Car Club Ambassadors.

7.2.11. It is recognised that the best time to influence travel behaviour is when residents first move into or utilise a new development. The car club will therefore be in place and operational prior to occupation of the first dwelling. New residents will be provided with 3 years' free annual membership that will be funded by the developer.

7.2.12. As part of the TPC's duties, the benefits of the car clubs will be highlighted to future residents, including:

- i Cheaper: owning a car has the added cost of insurance, tax, service and maintenance and depreciation.
- i Greener: generally those involved in the scheme choose walking, cycling and public transport as their mode of travel, using the car club only when it is the best option.
- i Convenient: you can book with a minute's notice and be on your way in a clean, well looked after car, which you use only for as long as you need it.

### Electric vehicle parking

7.2.13. To encourage sustainable travel, electric vehicle charging points will be provided in line with the draft New London Plan standards. The draft New London Plan demands that 20% of residential parking spaces across the development have electric vehicle charging points, with the remaining bays featuring passive provision for future conversion into electric charging bays.

7.2.14. These proposals ensure that:

- i All electric vehicle parking spaces are clearly signed and located in prominent, convenient and accessible locations in the car parks e.g. close to the entrance of facilities.
- i They meet the appropriate technical standards for the type of development.
- i A full cabling network will be installed in the car parking area to support all active and passive charging points (32 amp rated to ensure flexibility).
- i The default socket type to install at 'active' charge points will be Type 2 IEC62196-2 connector.
- i The car club parking spaces will be prioritised for the provision of Electric Vehicle Charging points, especially with regard to the provision of passive charging infrastructure that would cover all car club parking spaces.
- i There is a five metre level surface at the end of the ramp to allow for vehicles and pedestrian visibility.

7.2.15. **Table 7-1** sets out the technical standards that will be used for the electric vehicle charging points for the development.

**Table 7-1: Electric vehicle charging points technical standards**

Land use	Voltage (V)	Current (amps)	Nominal charge power (kW)
Residential	230	13-16, single phase	3

### New and improved pedestrian and cycling facilities

7.2.16. As part of the development proposals, significant improvements are proposed to the highway network immediately surrounding the site that will benefit pedestrians and cyclists, namely:

- i The entrance to the site at the south-eastern corner of the site takes the form of a 'gateway' acting as an extension of the high street with landscaped public realm.
- i It is proposed to improve pedestrian and cyclist crossing facilities at Hillingdon Circus, with pedestrian islands being widened and modernised across the north, east and south arms of the junction to enhance safety and to provide additional space for wheelchair users, pedestrians with pushchairs, and cyclists.
- i The southbound approach from Long Lane North will be re-aligned to allow for the widening of the pedestrian crossing islands on the north and south junction arms.
- i The footway at the X90 / Oxford Tube bus stop along Freezeland Way will be widened to allow for a suitable bus shelter. Dropped kerbs will also be provided to allow for improved mobility impaired access.

7.2.17. These improvements are shown in Drawing SK 70028642-013 in **Appendix B**, and will help connect to convenient routes towards local facilities and the public transport service access points within the immediate surrounding area.

### Cycle parking - residential

7.2.18. Cycle parking provision will meet the minimum standards set out within the draft New London Plan that requires provision of one cycle space per 1 bedroom unit and 2 cycle spaces per 2+ bedroom unit. Its implementation considers:

- i Layout – all parking is conveniently located and laid out to ensure that users can comfortably manoeuvre in and out of cycle stands.
- i Signage – signage will be provided on and near the site directing users to cycle parking facilities.
- i Attractive – cycle parking facilities will be maintained to a good condition to ensure it is inviting to use.
- i Secure – to be located in areas where they have high levels of passive surveillance and where this is not possible, security lighting will be implemented to further reduce the risk of bike theft.
- i Covered – future residents will benefit from cycle parking that is sheltered and protected from the elements.
- i Type of stand – Sheffield / Camden type stands will be used. Front wheel locking stands will not be considered.

7.2.19. The cycling related measures will contribute towards the objectives of LBH's 'Go Cycle Programme', which is designed to encourage more people to cycle and improve safety while providing better streets and places for everyone.

7.2.20. **Table 7-2** shows the site-wide cycle parking provision. It has been assumed that the flexible commercial use will take the form of A2-A5 F&B retail.

**Table 7-2: Cycle parking provision**

Land Use	Draft London Plan standards for long-stay parking	Draft London Plan standards for short-stay parking	Relevant development quantum	Long-stay cycle parking provision	Short-stay cycle parking provision
Residential (C3)	1.5 spaces per 2 person 1 bed	1 space per 40 units	221	332	13
	2 spaces per 2+ bed		293	586	
Flexible retail (A3)	1 space per 175m <sup>2</sup>	1 space per 40m <sup>2</sup>	1,259m <sup>2</sup>	8	32
<b>Total</b>				<b>926</b>	<b>45</b>

### New cycle hub

- 7.2.21. The developer has agreed that the proposed development will provide a new 'Cycle Hub' to be located within the site. It will be situated at the front of Block 4 within the landscaped public realm. This forms part of the suite of sustainable transport initiatives that will be implemented across the site.
- 7.2.22. The cycle hub is located close to Hillingdon Underground Station and will benefit both new residents and existing local residents. This would help contribute towards the draft Mayor's Transport Strategy (MTS) target which aims to increase cycling mode share across London from 1% in 2001 to 5% by 2026.
- 7.2.23. Such facilities are becoming more widespread across London with recent 'Cycle Superhubs' implemented at Hounslow West and North Greenwich Stations. The scale of the hub will at a minimum include:
- i High quality, visible and conveniently located visitor cycle parking, which enables the cycle to be secured by the frame and at least one wheel.
  - i Brompton / traditional cycle hire facilities.
  - i Repair and maintenance facilities.
  - i At least 5-10% of provision in the form of accessible stands.
  - i The provision of CCTV, lighting and shelters where appropriate.
  - i Safe and conveniently located cycle access routes to and from the station, which link with other cycle routes in the area.
  - i Signage to, through and from the station area, connecting to cycle routes / key demand routes and the cycle parking facilities.



7.2.24. **Figure 7-4** provides an example of a similar cycle hub that has been recently implemented at Teddington Station.

**Figure 7-4: Teddington Cycle Hub**



7.2.25. Implementation of this will contribute towards:

- ❑ Increasing the number of residents cycling within the local area.
- ❑ Raising awareness and increase the visibility and appeal of cycling as a mode of travel.
- ❑ Improve cycle security.
- ❑ Improve customer satisfaction with station and interchange facilities in the area.

7.2.26. The facilities will include CCTV cameras to provide security, bike maintenance facilities and a weather & live departure screen confirming train times. Examples of this at Teddington Station are shown in **Figure 7-5**.

**Figure 7-5: Cycle Hub facilities at Teddington Station**



- 7.2.27. It is proposed that a Brompton and traditional bike hire facility is provided within the Cycle Hub, which will also be easily accessible to users of Hillingdon Underground Station. This will provide local residents and future residents with access to 24/7 automated folding bike hire and traditional bike hire (in 50:50 proportion).
- 7.2.28. The Brompton bike hire station will target different journeys to the central London cycle hire scheme, due to offering more flexibility in journey type and duration, at one simple low price. The docks allow people to take out bikes and use them for a rolling 24 hour period, as opposed to sub-30 minute journeys with the Santander bicycle hire scheme. This means people can treat the Brompton bikes as if they are their own, taking them to work or home, folding them and keeping them by their desks.
- 7.2.29. It also provides the added flexibility for combined journeys, as these can be transported on buses & trains, and in taxis & cars. Users will need to register online with Brompton which will then allow them to hire a bicycle for 24 hours. Having become a member, users:
- i Can reserve a locker to return your bike to either online or by text. Users can return the Brompton bike to any public dock in the UK network. For example, you can take a bike out at Hillingdon and return it to Peterborough.
  - i Can keep a bike out for as long as you want as charges will just roll over. You only need to make a reservation to return the bike once you decide to give it back.
  - i Have a choice between two tariffs:
    - Frequent - £20 annual fee and daily hire of £2.50.
    - Leisure - £1 annual fee and daily hire £5.
- 7.2.30. Within the Cycle Hub, it is also proposed that a traditional bike hire dock is provided. This will provide local residents and future residents with access to traditional bike hire. It is proposed that there will be a 50:50 split between the proportion of Brompton and traditional bicycles that are available for hire.

### 7.3 SOFT MEASURES

- 7.3.1. As mentioned earlier in this section, 'soft' measures refer primarily to marketing and management measures, as opposed to engineering measures incorporated into the design of the development. The 'soft' measures proposed are discussed in turn.

#### Appointment of Travel Plan coordinator

- 7.3.2. A Travel Plan Coordinator (TPC) will be appointed prior to first occupation and be responsible for managing and implementing the Travel Plan. It is anticipated that the role will be fulfilled by a member of the residence committee or an appointed consultant. Their role will focus on:
- i Day to day liaison with all stakeholders as necessary – giving a 'human face' to the Travel Plan.
  - i Implementation of the Travel Plan measures.
  - i Managing travel information including distribution of a welcome pack to new residents.
  - i Promoting non-car travel through the Travel Plan measures.
  - i Reporting progress to any Travel Plan stakeholders, including LBH.
  - i Managing the monitoring and progress of the Travel Plan targets.

### **Oyster travel card**

- 7.3.3. Application forms will be provided to future residents for one Oyster Card per dwelling upon first occupation, with £40 credit to be funded by the developer. This will encourage residents both to utilise public transport services operating in close proximity of the site when they first arrive and to continue to do so such that travel by public transport becomes the 'norm'.
- 7.3.4. This measure is aimed at encouraging future residents to travel via sustainable means for localised trips. It is assumed that future residents commuting to central London will be travelling via sustainable means regardless of this measure, due to the impracticalities of travelling by private vehicle.
- 7.3.5. A credit note of this sum will allow for a variety of journeys during peak periods, such as:
  - i By Bus:
    - x 26 bus journeys.
  - i By Tube:
    - x 3 return trips to central London.
    - x 8 return trips to Wembley Park / Sudbury Town.
    - x 11 return trips to local stations.
- 7.3.6. This credit will be made available to future residents immediately upon occupation, to encourage and establish localised trips to be undertaken via sustainable modes as the 'norm'.

### **Residential travel pack**

- 7.3.7. Upon occupation, every resident will be provided with a residential travel pack promoting sustainable modes of transport and key services provided through the Travel Plan. This will also contain information on the facilities within the development and nearby.
- 7.3.8. Primarily, the pack will contain details on cycling, walking and public transport routes to key local facilities, including current timetables for local bus and Underground services. It will also provide the details of the appointed TPC and invite future residents to raise specific transport-related matters with them.
- 7.3.9. It will, at a minimum, include the following:

#### **Access initiatives**

- 7.3.10. A high quality map of the local area identifying cycling, walking and public transport routes to and from the site and the locations of key local facilities accessible on foot. This will be updated on a yearly basis.

#### **Journey planner tools**

- 7.3.11. Additional sources of information such as TfL's Journey Planner website will also be provided, as well as an application form for one Oyster Card per dwelling with £40 credit to be funded by the developer discussed above.

#### **Key services and facilities**

- 7.3.12. Details of the key services and facilities such as the location of cycle parking and maintenance facilities and contact details for local taxi operators.



### **Health benefits associated with alternative modes of transport**

- 7.3.13. Promotion of health benefits associated with walking and cycling on the communal notice boards.

#### **London Cycling Campaign**

- 7.3.14. Promotion of the LCC, a cyclist's organisation with local groups throughout London. Local LCC groups promote cycling locally, improve conditions for cyclists in their borough, organise leisure rides and social events and provide support for cyclists.
- 7.3.15. The benefits on offer to LCC members include discounts at bike shops, exclusive cycle theft insurance packages, free third party insurance for damage or injury up to the value of £1M, access to local LCC borough groups and free legal advice.

#### **Cycling promotion**

- 7.3.16. Promotion of cycling within the Borough, with hints and tips for all cyclists in the area, including cycle training, rides and routes, clubs as well as advice on where to buy or hire a bicycle.

#### **Web-based working from home**

- 7.3.17. Details of the use of web-based working from home to reduce the need to travel whilst providing benefits for the mobility impaired.

#### **Car share clubs**

- 7.3.18. Promotion of car sharing websites such as [www.liftshare.com](http://www.liftshare.com).

#### **Car clubs**

- 7.3.19. Promotion of contractor and an application for three years' free annual membership per dwelling upon first occupation, to be funded by the developer.

#### **Community notice boards**

- 7.3.20. Community notice boards providing travel and community information as well as events in the area will be placed in prominent locations within the site. Such events will provide future residents with:
- ❑ Free bike checks from bicycle mechanics.
  - ❑ Overview of new route designs and plans and future consultation opportunities.
  - ❑ Advice from experts about different cycling opportunities available in the borough.
  - ❑ Cycle skills training (with different bikes to try out).
- 7.3.21. In addition, maps of the immediate local area will be displayed identifying locations of cycle parking, car club bays and public transport service access points.
- 7.3.22. The notice boards will also be used to inform residents of any new travel initiatives or events organised by the TPC.

## 8 MONITORING AND REVIEW

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### 8.1 INTRODUCTION

- 8.1.1. A programme of monitoring and review will be implemented to generate information by which the success of the Travel Plan will be evaluated. This will help to establish whether the agreed objectives and targets are being met. Monitoring and review will be the responsibility of TPC.

### 8.2 MONITORING OF RESIDENTIAL UNITS

- 8.2.1. The TPC will arrange the initial travel survey to be undertaken for the development once a trigger point of 50% occupation of the residential units has been reached.
- 8.2.2. The travel survey will then be undertaken at the third and fifth year after the after the trigger point has been reached (50% occupation). All monitoring will be iTRACE and TRICS compliant so it can ultimately be incorporated into the TRICS database. The surveys will comprise of the following components:
- Questionnaire surveys of residents/ visitors undertaken.
  - Pedestrian, cycle and vehicle counts at the access points into the site.
  - A servicing survey will be undertaken.
- 8.2.3. Monitoring will continue on a rolling five year (3 and 5) basis if targets are not met within the initial monitoring period, unless otherwise agreed in writing with LBH.

### 8.3 REVIEW

- 8.3.1. The TPC will report the survey results to LBH within one month of each survey. The TPC and officers of LBH will then review the results and if appropriate, revise the target accordingly. The results of the travel survey and revised targets will be included in the subsequent revision of the Travel Plan.

### 8.4 ACTION PLAN

- 8.4.1. To enable specific actions to be monitored, an action plan must have a measurable output. **Table 8-1** sets out tasks, intended implementation dates and funding sources.

**Table 8-1: Action plan**

Action	Target date	Funding	Responsibility
Appointment of TPC	Prior to first occupation	Developer	Developer
Bus service improvements	Prior to first occupation	Developer	TfL
Oyster Card application form with £40 credit	Prior to occupation	Developer	Developer
Car club provision (minimum of 4 car club bays upon complete implementation)	Prior to first occupation	Developer	Developer
3 years free car club membership for residents	Prior to occupation	Developer	Developer
Implementation of community notice boards to promote travel specific information and benefits of sustainable travel	Prior to occupation	Developer	TPC
Implementation of Cycle Hub & Brompton / traditional bike hire	Upon completion of Block 4	To be agreed with LBH / TfL	Developer
Implementation of electric vehicle charging points	Prior to occupation	Developer	Developer
Provision of cycle maintenance facilities	Prior to occupation	Developer	Developer
Production of residential welcome pack including details of key initiatives	Distribution to every resident	Developer	Developer
Monitoring – TRICS compliant surveys to be undertaken upon 50% occupation and Year 1, 3 and 5 to monitor progress	Upon 50% occupation	Developer	TPC
Highway improvement works	Prior to first occupation	Developer	Developer / LBH



WSP House  
70 Chancery Lane  
London  
WC2A 1AF

**wsp.com**

PUBLIC

██████████  
Principal Planner  
London Borough of Hillingdon

***By Email Only***

13 February 2020

Dear ██████████

**'HILLINGDON GARDENS' – FORMER MASTER BREWER SITE, FREEZELAND WAY, HILLINGDON,  
REF: 4266/PRC/2019/3088 (GLA/0995g/01)**

Knight Frank writes on behalf of Inland Limited (the 'Applicant') in relation to the re-development of the Former Master Brewer Motel Site (ref: 4266/PRC/2019/3088/GLA/0995g/01), known as 'Hillingdon Gardens'.

Following the publication of the Planning Committee Report on 12<sup>th</sup> February 2020, we write in response to the recommended reasons for refusal and provide further clarification on each of the outstanding issues. The recommended reasons for refusal relate to the following:

- ◆ Design;
- ◆ Parking;
- ◆ Traffic;
- ◆ Air Quality;
- ◆ Daylight and Sunlight;
- ◆ Private Amenity Space; and
- ◆ Planning Obligations.

The attached schedule and accompanying information provides a summary of our responses to the above-mentioned issues and our proposed solutions. We hope that the information provided can be considered and inform your reporting to the forthcoming planning committee.

We trust that the comprehensive responses outlined provide sufficient further information to satisfy the comments and queries raised. However, should you require anything further, please do not hesitate to contact me at this office ██████████ [@knightfrank.com](mailto:██████████@knightfrank.com)).

Yours sincerely

██  
**Partner**  
(On behalf of Inland Limited)

██  
55 Baker Street London W1U 8AN

[knightfrank.co.uk](http://knightfrank.co.uk)

Knight Frank LLP is a limited liability partnership registered in England with registered number OC305934.  
Our registered office is 55 Baker Street, London, W1U 8AN where you may look at a list of members' names.

## Hillingdon Gardens (Application ref. 4266/APP/2019/3088) – Committee Report Response Schedule

Reason for Refusal	Response	Solution
<p><b>Design</b></p> <p>The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt, the wider open context and would mar the skyline, contrary to Policies BE1 and EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMHB 10, DMHB 11, DMHB 12, DMHB 14, DMHB 17, DMEI 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policy SA 14 (Master Brewer and Hillingdon Circus) of the Local Plan: Part Two - Site Allocations and Designations (2020), Policies 7.4, 7.6, 7.7 of the London Plan (2016), Policies D1, D3, D4, D8 and D9 of the London Plan (Intend to Publish version 2019) and the NPPF (2019).</p>	<p>The planning application was accompanied by a Design and Access Statement (dated 8<sup>th</sup> October 2019) prepared by JTP, Collado Collins and BMD. Comments were received from LB Hillingdon Design Officer in January 2020 to which a response was provided on 24<sup>th</sup> January 2020 within the Knight Frank post-submission consultation response schedule.</p> <p>As set out within the submitted Design and Access Statement and post-submission consultation response, the proposal has been subject to an extensive masterplanning and architectural design process, which has resulted in an optimal layout for the site. The layout seeks to balance the site's complexities and constraints; and responds to the requirements of policy, whilst also making best use of this brownfield, allocated site.</p> <p>Key concepts supporting the masterplan approach have included mechanisms to ensure that the site becomes better integrated into its surrounding context, given its relative isolation within a predominantly highways dominated location, through the provision of cross site non-vehicular connections. Furthermore, supporting non-residential uses have been proposed to complement the existing local centre and further active</p>	<p>Position maintained as set out in Design and Access Statement dated 8<sup>th</sup> October 2019 prepared by JTP, Collado Collins and BMD and post-submission consultation response schedule dated 24<sup>th</sup> January 2020.</p>

	ground floor spaces. The provision of such uses in this location have been found to be acceptable previously, as established by a resolution to grant planning permission for a large retail supermarket and retail units.	
<p><b><u>Parking</u></b></p> <p>The proposed on site residential and commercial car parking provision is insufficient to address the demands of the proposed development and its future occupiers. Due to the sites low public transport accessibility, the proposed development would lead to future resident and visitor vehicles being displaced onto the surrounding local and strategic road network. This displacement of vehicles would lead to further congestion on the local and strategic highway network resulting in severe harm to the highway network and highway and pedestrian safety. The proposals are contrary to Policy T1 and E5 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policies 6.3, 6.11 and 6.12 of the London Plan (July 2016), Policies T4, T6 and T6.1 of the draft London Plan (Intend to publish version 2019) and the NPPF (2019).</p>	<p>The planning application was accompanied by a Transport Assessment (including a Travel Plan) (dated October 2019) prepared by WSP. Comments were received from LB Hillingdon Highways Authority on 8th January 2020, to which a comprehensive response was provided on 24th January comprising a post-application response note prepared by WSP (dated January 2020).</p> <p>As set out the post-application response note, in order for the development to balance the need to provide sufficient car parking to meet demand whilst also promoting sustainable travel and reduced reliance on private car usage (in line with established and emerging policy), on-site car parking provision for the residential element of the development will be provided at an overall ratio of 0.3 spaces per dwelling, equating to 154 parking spaces in total. As acknowledged by LB Hillingdon, this car parking ratio has been discussed and agreed with TfL, is supported by the GLA, and takes into account a range of relevant factors, including proximity to public transport services, the type and size of residential units proposed, the target demographic for the development, the sustainable travel measures proposed within the application, and the Car Parking</p>	<p>Position maintained as set out in Transport Statement (including Travel Plan) dated October 2019 and post-application response note prepared by WSP (dated January 2020).</p>



	<p>Management Plan that has been prepared to accompany the Transport Assessment.</p> <p>The proposed development follows the principles laid out in Healthy Streets for London and the draft New London Plan, and will promote more sustainable travel habits amongst future occupants through the sustainable travel initiatives set out in the Travel Plan and included within the scheme design.</p> <p>The introduction of a car club at the site will provide residents who don't own or lease a vehicle with direct access to a car should they require it. Up to four on-site car club bays are proposed, with the developer committed to providing each household with 3 years' free membership upon initial occupation. Further additional measures have also been proposed to encourage travel by non-car modes including a contribution towards funding a new bus service; improvements to pedestrian and cycle crossing facilities at Hillingdon Circus junction; on-site cycle parking facilities in line with draft New London Plan standards; and the provision of a cycle 'super hub' within the site.</p>	
<p><b><u>Traffic</u></b></p> <p>The application fails to demonstrate that the proposal would not result in an unacceptable rise in traffic around the application site causing severe impacts to the free flow of traffic as well as to highway and</p>	<p>The planning application was accompanied by a Transport Assessment (including a Travel Plan) (dated October 2019) prepared by WSP. A Transport Assessment Addendum was also prepared in November 2019 outlining the findings of 2019 survey data against the previously modelled 2017 surveys. Comments were</p>	<p>Position maintained as set out in Transport Assessment (including Travel Plan) dated October 2019, Transport Assessment Addendum dated November 2019 and post-application response note prepared by WSP (dated January 2020).</p>

<p>pedestrian safety. The proposals are contrary to Policy T1 and</p> <p>E5 of the Hillingdon Local Plan: Part One - Strategic Policies (Nov 2012), Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020); Policies 6.3, 6.11 and 6.12 of the London Plan (July 2016), Policies T4, T6 and T6.1 of the draft London Plan (Intend to publish version 2019) and the NPPF (2019).</p>	<p>received from LB Hillingdon Highways Authority on 8th January 2020, to which a comprehensive response was provided on 24th January comprising a post-application response note prepared by WSP (dated January 2020).</p> <p>The 2019 survey data shows that there has been an 11% reduction in traffic flows through Hillingdon Circus in the AM peak hour, and a 9% reduction in the PM peak hour since 2017. There is a difference in professional opinion regarding traffic growth as there is no reasoned justification why the traffic volumes through the junction have increased. Indeed, the evidence points to the contrary.</p> <p>All the evidence, compiled in the form of thorough local traffic surveys, conducted in 2010, 2017 and 2019, suggests that there has been a reduction in the traffic volumes through Hillingdon Circus. The modelled 2017 baseline presents a robust worst case and the conclusions of that assessment remain valid.</p>	
<p><b>Noise</b></p> <p>The submitted noise report has failed to demonstrate that the proposed residential units can be sited, designed, insulated or otherwise protected from external noise sources and in particular the A40 and Long lane to appropriate national and local standards. The proposal is therefore contrary to Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) Chapters 12 and</p>	<p>Comments received from the LPA's independent consultants, Anderson Acoustics, have been reviewed and responded to accordingly.</p> <p>Comments were received from Anderson Acoustics dated 2<sup>nd</sup> January. A response was provided on 24<sup>th</sup> January comprising a Revised Acoustic Assessment report ref. NDT5882/17025/Rev 9 dated 22nd January 2020 prepared by Spectrum Acoustics and</p>	<p>It should be noted that Anderson Acoustics comments do not suggest a reason for refusal based on acoustics. The recommendations identified have or can be addressed with ease, as identified in the accompanying responses prepared by Spectrum Acoustics and Cudd Bentley.</p> <p>Please find attached the following:</p>

<p>15 of the NPPF (2019), Policy DMHB 11 of the Local Plan Part 2- Development Management Policies (2020), Policy 7.15 of the London Plan (2016) and Policy D14 of the London Plan (Intend to Publish version 2019).</p>	<p>supplementary Acoustic Design Note dated 24th January 2020 prepared by Collado Collins.</p> <p>Additional comments were received from Anderson Acoustics on 4<sup>th</sup> February 2020. Final clarification responses to these comments are provided with this schedule comprising a letter prepared by Spectrum Acoustics (dated 12<sup>th</sup> February 2020) and a clarification statement prepared by Cudd Bentley (dated 12<sup>th</sup> February 2020). Whilst this is to be formally review by Anderson Acoustics, it provides a comprehensive response to all outstanding matters raised in their comments dated 4<sup>th</sup> February.</p>	<ul style="list-style-type: none"> <li>- Letter prepared by Spectrum Acoustics dated 12<sup>th</sup> February 2020; and</li> <li>- Clarification Statement prepared by Cudd Bentley dated 12<sup>th</sup> February 2020.</li> </ul> <p>Where conditions are recommended within the attached to respond to detailed matters, it is considered that this would be acceptable as it is a widely adopted approach to dealing with flexible use classes; construction management; commercial plant noise and noise mitigation; and compliance with an energy strategy including mechanical ventilation and heat recovery (MVHR), and ventilation.</p>
<p><b><u>Air Quality</u></b></p> <p>The submitted Air Quality Assessments have failed to provide sufficient information regarding Air Quality, moreover the information submitted is not deemed to demonstrate the proposals are air quality neutral and given that the site is within an Air Quality Focus Area, the development could add to current exceedances in this focus area. The development is contrary to Policy DME1 14 (Air quality) of the Local Plan: Part 2 - Development Management Policies (2020), Policy EM8 of the Local Plan Part 1 (2012), Policy 7.14 (Improving Air Quality) of the London Plan (2016), Policy SI 1 of the draft London Plan - Intend to Publish (December 2019) and the NPPF (February 2019).</p>	<p>Comments received from the LPA's independent consultants, Air Quality Experts Global Ltd, have been reviewed and responded to accordingly. This has been dealt with by way of dialogue and exchange of emails including appropriate clarifications.</p>	<p>In light of comments received from the LPA, two options have been considered to resolve outstanding matters and provide a solution to queries. These comprise:</p> <ol style="list-style-type: none"> <li>1) Continued monitoring and data collection in an appropriately worded condition; or</li> <li>2) Establishment of necessary mitigation measures alongside damage costs to supplement work completed to date.</li> </ol> <p>Please find attached the following:</p> <ul style="list-style-type: none"> <li>- Letter dated 12<sup>th</sup> February 2020 prepared by Create Consulting Engineers Ltd.</li> </ul> <p>Where conditions are recommended within the attached to respond to detailed matters, it is</p>

		considered that this would be acceptable as it is a widely adopted approach to dealing with emission reduction measures and design.
<p><b><u>Daylight and Sunlight</u></b></p> <p>The submitted Sunlight and Daylight Assessment has failed to adequately assess the expected Daylight and Sunlight levels within the development in accordance with BRE guidance. The proposed development has therefore failed to demonstrate that the proposed residential units would achieve adequate Daylight and Sunlight levels to the detriment of residential amenity of future occupiers contrary to policies DMHB 10 and DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy BE1 of the Local Plan Part 1 (2012), The GLA 'Housing' SPG (March 2016), Policy D6 of the London Plan (Intend to Publish version 2019) and the NPPF 2019.</p>	<p>Comments received from the LPA's independent consultants, Lambert Smith Hampton (LSH), have been reviewed and responded to accordingly.</p> <p>Comments were received from LSH dated 13<sup>th</sup> January 2020. A response was provided by Robinson's Surveyors Ltd on 24<sup>th</sup> January 2020.</p> <p>Additional comments were received from LSH on 31<sup>st</sup> January 2020. Final clarification responses to these comments are provided with this schedule comprising a letter prepared by Robinsons Surveyors Ltd (dated 13<sup>th</sup> February 2020). Whilst this is to be formally review by LSH, it provides a comprehensive response to all outstanding matters raised in their comments dated 31<sup>st</sup> January.</p>	<p>The majority of queries had previously been resolved, as acknowledged in the exchange of comments and responses. Of those remaining, appropriate clarification or solution is provided in the attached letter prepared by Robinsons Surveyors Ltd dated 13<sup>th</sup> February 2020.</p> <p>It has been demonstrated that the proposed residential units would achieve daylight and sunlight levels which can be supported.</p>
<p><b><u>Private Amenity Space</u></b></p> <p>The proposed development fails to provide on site private and communal amenity of a quantity and quality commensurate to the size and layout of the proposals. The shortfalls of private amenity space are detrimental to the residential amenity of the future occupiers the proposal would provide a substandard form of accommodation for future residents contrary to Policies DMHB 11 and DMHB 18 of the Local Plan</p>	<p>The proposal includes private amenity space in compliance with the standards set out in the Mayor's Housing SPG (2016) and the Draft New London Plan (2019) which requires:</p> <ul style="list-style-type: none"> <li>- A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant; and</li> <li>- The minimum depth and width for all balconies and other private external spaces should be 1500mm.</li> </ul>	<p>Position maintained as per original submission. Details of the provision of private external amenity space for each dwelling has been set out within the submitted dwelling schedule (Rev P5) (dated 12<sup>th</sup> December 2019), which demonstrates that each unit has access to private amenity space consistent with the Housing SPG standards, in addition to semi-private and public amenity space.</p>

<p>Part 2- Development Management Policies (2020), Policy BE1 of the Local Plan Part 1 (2012), Policy 7.1 of the London Plan (2016), Policies G1 and D6 of the Draft London Plan (Intend to Publish version 20129) and Para 127 of the NPPF (2019).</p>	<p>We acknowledge that LB Hillingdon Local Plan Policy DMHB 18 sets considerably higher private amenity standards to those stated above. Policy DMHB 18 supporting text also states that, “communal provision of private outdoor space is generally not supported unless there are strong planning reasons and the proposed scheme is of high quality with clear planning merits.”</p> <p>The landscape scheme collectively offers a variety of high quality private and publicly accessible multifunctional spaces providing new links to green belt land. Furthermore, the scheme offers new public realm, both informal and formal play spaces as well as a net-gain in biodiversity. All of which offer a clear planning benefit and planning merits. This is acknowledged within the committee report which states, <i>“the quality and quantity of the proposed public open space proposed within the development is considered to provide new open space which would be of benefit to the existing and future residents of the site and surrounding area.”</i></p>	
<p><b><u>Planning Obligations</u></b></p> <p>The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Affordable housing, construction training, landscape and ecological announcements, carbon offset contributions, surface water drainage, parking permit exclusion, car clubs</p>	<p>Suggested draft heads of terms have been prepared and circulated to the LPA for consideration and agreement in principle. This is reflected in the committee report.</p> <p>Whilst it is acknowledged that a legal agreement or a unilateral undertaking has not been signed, with further negotiation on detail required, in principle agreement has been provided as far as possible.</p>	<p>Refine and agree the heads of terms established to support any grant of planning permission.</p>

<p>and Project Management and Monitoring). The scheme therefore conflicts with Policies Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), DMCI 7 of the Hillingdon Local Plan Part 2 Development management Policies (2020), the London Borough of Hillingdon Supplementary Planning Document on Planning Obligations, Policy SA 14 'Master Brewer and Hillingdon Circus' of the Local Plan: Part Two Site Allocations and Designations (2020), Policy DF1 of the Draft London Plan (Intend to Publish Version 2019), Policy 8.2 of the London Plan (2016) and the NPPF 2019.</p>		
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Ministry of Housing,  
Communities &  
Local Government

██████████  
Team Leader – Special Projects  
Planning  
Greater London Authority  
City Hall, The Queen's Walk,  
London  
SE1 2AA

Please  
ask for: ██████████  
Tel: Email Only  
Email: ██████████@communities.gov.uk  
  
Your ref:  
  
Our ref: PCU/RTI/5510/3252677

Date: 20 August 2020

Dear ██████████

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT  
PROCEDURE) (ENGLAND) ORDER 2015  
FORMER MASTER BREWER SITE, FREEZELAND WAY, LB HILLINGDON  
LOCAL AUTHORITY REFERENCE: 4266/APP/2019/3088**

1. I am directed by the Secretary of State to refer to the above planning applications.
2. In exercise of his powers under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Secretary of State hereby directs your Authority not to grant permission on these applications without specific authorisation. This direction is issued to enable him to consider whether he should direct under Section 77 of the Town and Country Planning Act 1990 that the applications should be referred to him for determination.
3. I would be grateful for acknowledgement of your receipt of this letter. Please contact me on the number above if you have any queries.

Yours sincerely

██████████

██████████  
**Senior Planning Casework Manager**

Planning Casework Unit  
Ministry of Housing, Communities and Local Government  
5 St Philips Place  
Colmore Row  
Birmingham B3 2PW

Tel: ██████████  
PCU@communities.gov.uk



The Rt. Hon Robert Jenrick MP  
Secretary of State  
Ministry of Housing, Communities and Local Government  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Date: 18 September 2020  
Our reference: I1080544

By Email Only - [PCU@communities.gov.uk](mailto:PCU@communities.gov.uk)

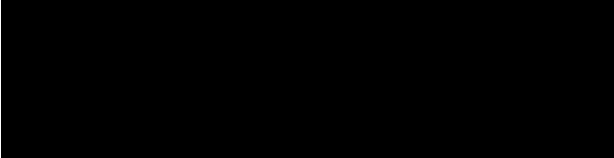
Dear Secretary of State,

**Re: Planning Application by Inland Homes: Greater London Authority Reference GLA/0995g  
Former Master Brewer Site, Freezeland Way, London Borough of Hillingdon**

We write on behalf of our client, Inland Homes PLC, to acknowledge receipt of a letter from the London Borough of Hillingdon (dated 16 September) addressed to yourself pursuant to the above-mentioned application. We are considering the detail of this letter and will respond in writing by close on 25 September.

We should be grateful if you would hold your determination in abeyance pending receipt of our response, so that it may be considered in your deliberation.

Yours sincerely,

  
Partner, Planning

**(For and on behalf of Knight Frank LLP)**

Cc.

-  London Borough of Hillingdon
- Greater London Authority

Knight Frank  
55 Baker Street  
London  
W1U 8AN

**[knightfrank.co.uk](http://knightfrank.co.uk)**

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**Subject:**

FW: 4266/APP/2017/3183 - HILLINGDON GATEWAY (FORMER MASTER BREWER  
MOTEL SITE) FREEZELAND WAY UB10 9PQ

**From:** [REDACTED]@hillington.gov.uk]

**Sent:** 01 February 2019 14:45

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Fwd: 4266/APP/2017/3183 - HILLINGDON GATEWAY (FORMER MASTER BREWER MOTEL SITE)  
FREEZELAND WAY UB10 9PQ

Dear [REDACTED]

Apologies that we have not been able to respond to you sooner.

I appreciate that you wish to meet, however [REDACTED] has been busy completing his committee report, i can advise that the case will now be reported to the 19th Feb planning committee meeting.

It is unlikely to come as a surprise that the application is recommended for refusal based on the revisions which were consulted on over Christmas 2018.

I appreciate that you have been passed some planning obligation details, but not all, therefore Karl has kindly provided me with an extract of his report detailing the Heads of Terms.

Please can i seek your confirmation that you are agreeable to the full Heads of Terms proposed to allow us to update the committee report accordingly.

Kind regards  
[REDACTED]

"The Council's Section 106 Officer has reviewed the proposal, as have other internal and statutory consultees, including the Greater London Authority and Transport for London. The comments received indicate the need for the following contributions or planning obligations to mitigate the impacts of the development. If the application were to be considered for approval, the following broad S106 Heads of Terms would be pursued by the Council.:

(i). Transport: A s278 and/or s38 agreement will be entered into to address any and all on site and off site highways works as a result of this proposal. These include the following:

- Land dedication from the site envelope to enable revised approach lanes in Long Lane (north) with enhanced pedestrian facilities,
- Improved pedestrian and cycling facilities throughout the signalled junction.
- Potential improvements to the service road approach in Freezeland Way (fronting the site).
- The creation of a new public realm 'Gateway' fronting the site on Freezeland Way.
- Enhanced bus stop provisions for the 'Oxford Tube' bus service,
- Monitoring of signal optimisation @ Hillingdon Circus,
- Contingency monies to remedy any parking displacement onto the public highway (£20,000),
- Review of local public lighting, road signage and marking provisions,
- Carriageway (including roadway anti-skid review) and footway condition surveys with remedial work where applicable.
- Implementation of vehicle actuated speed signs (up to a cost of £5,000).

- (ii). Public Transport Infrastructure: A 5 year public transport contribution toward a new bus service (£375,000); Bus priority measures (£30,000),
- (iii). Travel Plan initiatives/incentives with a financial performance bond (£20,000),
- (iv). Affordable Housing: Either 153 units (35%) as affordable housing, comprising 10 units in as Shared Ownership (41%) 90 units as London Affordable Rent (59%) or 174 units (40%) as affordable housing, (assuming grant funding of £28,000 per unit is available), comprising 68 units as Shared Ownership (39%) 106 units as London Affordable Rent (61%)
- (v). None of the market housing will be occupied until 100% of the affordable housing is delivered.
- (vi). Construction Training: either a construction training scheme delivered during the construction phase of the development or a financial contribution secured equal to the formula as contained in the SPD (£2,500 for every £1m build cost + (total gross floor area/7,200m<sup>2</sup> x £71,675) = total contribution).
- (vii). Landscape Screening and Ecological Mitigation: a financial contribution in the sum of at least £252,308.88.
- (viii). Air Quality: a financial contribution in the sum of £25,000.(to be further reviewed in light of amendments to the on site parking provision)
- (ix). Carbon Fund: a contribution of £317,268 for a carbon fund to make up for the shortfall for this development and to make it policy compliant
- (x). Project Management and Monitoring Fee: a contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement.

Contributions towards education, health, libraries and community facilities are now covered by the Hillingdon Community Infrastructure Levy.

The applicant has so far agreed in principle to the following proposed Heads of Terms.

- o Affordable Housing
- o Site Specific Transport Works (including Travel Plan)
- o Air Quality Improvements
- o Employment and Training Provision
- o Ecological Mitigation
- o Contribution towards improvements to adjacent Green Belt land"

--

[REDACTED]  
**Strategic and Major Applications Manager**

Planning Department  
Residents Services  
3N, Civic Centre  
London Borough of Hillingdon  
[REDACTED]

Please note that the comments made in this email represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination in relation to any application or planning matter.

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they are not necessarily those of the London Borough of Hillingdon. Service by email is not accepted unless by prior agreement.

██████████  
Development Management  
Greater London Authority

By Email Only: ██████████@london.gov.uk

Date: 26 August 2020  
Our reference: 11080544

Dear ██████████

**Response to Oak Farm Residents' Association Letter in relation to request for Screening Opinion ref. 4266/APP/2019/2607 at Former Master Brewer Site, Freezeland Way, Hillingdon**

I am writing on behalf of Inland Ltd, in response to the letter from Oak Farm Residents' Association ('OFRA') dated 18 August 2020 addressed to the London Borough of Hillingdon ('LBH') in relation to the above-mentioned Site. More specifically, the letter relates to the request for a Screening Opinion under Town & Country Planning (Environmental Impact Assessment) Regulations 2017, submitted by GL Hearn in August 2019 under application ref. 4266/AP/2019/2607.

The purpose of this letter is to provide a summary of the technical responses prepared by the applicant team and assist you by signposting the responses by topic, for ease of reference. OFRA's letter relates specifically to the request for a Screening Opinion rather than the planning application itself, however owing to its relationship to the application, we have considered both the Screening Opinion and Application in preparing our response.

This letter is accompanied by the following:

- EIA Screening Response Letter, GL Hearn (dated 25 August 2020) with the following attachments;
  - Oak Farm Residents Association Letter (dated 18 August 2020);
  - EIA Screening Opinion, LB Hillingdon (dated 3 October 2019);
  - EIA Screening Request, GL Hearn (dated August 2019); and
  - Technical Note, Spectrum Acoustic Consultants ref. NDT6079/17025 (dated 25 August 2020).
- Biodiversity Net Gain & Urban Greening Factor Calculations, London Wildlife Trust (dated October 2019);
- Ecology Phase 1 Habitat Report, BMD, ref. BMD.19.020.RPE/P1.801.RevA-.Ecology (dated September 2019);
- Reptile Report, BMD, ref. BMD.19.020.RPE/P2.804-Reptile (dated October 2019);
- MOD Safeguarding – RAF Northolt Letter, DIO Safeguarding (dated 14 August 2020);
- Townscape and Visual Impact Assessment, BMD, ref. BMD.19.020.RP.001 (dated October 2019);

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- Townscape and Visual Impact Assessment Addendum, BMD, ref. BMD.19.020.RP.006.A (dated December 2019);
- ZTV – 2020 Parameters Bare Earth, BMD, ref. BMD.19.020.TVIA.FIG.0003;
- ZTV – 2020 Parameters Visual Barriers, BMD, ref. BMD.19.020.TVIA.FIG.004; and
- Hillingdon Gardens Verified Views, BMD, ref. V3D 170401 (dated July 2020).

Additional clarification responses are also provided in the schedule below, grouped by topic for ease of reference.

Topic	Response
<b>EIA Screening Opinion Request (process &amp; technical matters)</b>	<ul style="list-style-type: none"> <li>• Please refer to EIA Screening Response Letter prepared by GL Hearn (dated 25 August 2020) and its accompanying attachments.</li> </ul>
<b>Ecology</b>	<ul style="list-style-type: none"> <li>• The letter from OFRA refers to a consultation response from London Wildlife Trust dated 1<sup>st</sup> October 2018 in relation to a previous planning application submitted on the application site under application ref. 4266/APP/2017/3183. The application was refused on 21<sup>st</sup> March 2019.</li> <li>• In consideration of the previous objections raised, the Applicant for the current scheme engaged with the London Wildlife Trust during the design development of the current proposal. Detail is provided in Section 4 of the Design and Access Statement prepared by Collado Collins (dated October 2019) as part of the planning application. This process has focused on creating a bio-diverse environment at the site via nature recovery networks, urban greening and biodiversity net gain strategies.</li> <li>• The current application is also supported by a Biodiversity Net Gain &amp; Urban Greening Factor Calculations (dated October 2019) prepared by the London Wildlife Trust which is attached for reference.</li> <li>• In relation to SSSI, the most up to date Ecology Assessment (BMD.19.020.RPE/P1.801.RevA-.Ecology) clarifies the SSSI, with Fray's Meadow approx. 2km to the North West. Furthermore, the report confirms that the site is within the Impact Risk Zone (IRZ) of the specific SSSI but is not classed as a type of development that would cause significant risk to the designated Site with no direct or indirect impacts anticipated (Para 4.4.1).</li> <li>• The submitted 2019 Ecology Assessment (BMD.19.020.RPE/P1.801.RevA-.Ecology) and also Reptile Survey Report (BMD.19.020RPE-P2.804.Reptile) sets out the protected species issues and relevant mitigation to safeguard with no significant residual issues identified.</li> </ul>
<b>Arboriculture</b>	<ul style="list-style-type: none"> <li>• Paragraph 4.6 of the EIA Screening Request states that, <i>"South of the Site lies Council-owned land which comprises mainly trees and shrubs and borders Freezeland Way. Two trees are subject to TPOs: one located on the southern border and the other in the middle of the Council-owned land."</i></li> <li>• Paragraph 4.26 of the EIA Screening Request further states, <i>"The western part of the Site and some of the Council-owned area are designated a Tree Preservation Order Area i.e. an area affected by a Tree Protection Order (TPO). In this instance, this Tree Preservation Order Area includes a TPO titled 'Land at and Adjoining the Golden Lion Hotel, Ickenham' which was designated in 1965. Within this TPO only 10 individual trees and 17 Elms within three separate Groups are included. The Tree Preservation Order Area does not include whole areas of trees or woodlands. Over the past 54 years (i.e. since the original designation in 1965), the central area of the Site has been redeveloped and cleared. This has resulted in only two of the original 10 individual trees remaining within the TPO: i.e. two Oaks, the rest of the trees and groups of Elms having long since gone. These two trees are both within the Council-owned area. They are therefore outside the boundary of the Site and would not be affected by the Proposed Development."</i></li> </ul>

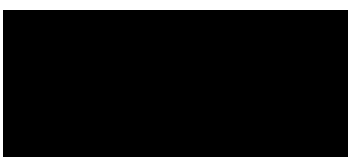
	<ul style="list-style-type: none"> <li>Part 2(b) of the EIA Screening Assessment (Table 3) states, “<i>The Site contains mature trees, areas of improved grassland, tall ruderal vegetation and dense/shrubs and hedgerow along its boundary. The western part of the Site is a designated Tree Preservation Area but there are no trees or areas of trees subject to TPOs within the Site.</i>”</li> <li>Page 71 of LBH’s Committee Report states that, “<i>The site is covered by TPO 6, however, there are no protected trees remaining on the master Brewer site. Two oaks T7 and T9 survive on the Council-owned land in the south-east.</i>” Furthermore, page 73 states, “<i>The tree loss on the proposed development is significant, with much of the tree removal already implemented. As previously noted the quantum of loss was previously accepted by the Council, as part of the Tesco scheme. No protected trees will be removed to facilitate the development.</i>”</li> <li>As correctly reported within the Screening Opinion prepared by GL Hearn and confirmed by LBH within the Committee Report, there are no TPO trees on the application site. The Screening Opinion acknowledges that there is one TPO tree located on the southern border of the Site and one located in the middle of the Council-owned land. Neither of these trees are proposed for removal as part of the proposed development.</li> <li>As part of the application, 321 new trees are proposed and 48 trees are proposed for removal including: <ul style="list-style-type: none"> <li>1 category A tree;</li> <li>22 category B trees;</li> <li>18 category C trees; and</li> <li>7 category U trees.</li> </ul> None of the trees proposed for removal are covered by TPOs.</li> <li>The above should be read in conjunction with the EIA Screening Response Letter prepared by GL Hearn (dated 25 August 2020).</li> </ul>
<b>TVIA</b>	<p><u>Hillingdon Court</u></p> <ul style="list-style-type: none"> <li>Both Ickenham Manor and Hillingdon Court and Hillingdon Court Park are identified and recorded on Figure 2 at Appendix C of the TVIA (ref. BMD.19.020.RP.001, October 2019). Ickenham Manor is labelled by name as it falls within a 1km radius of the site.</li> <li>The Grade II listed Hillingdon Court is identified on plan within the wider study area of 2km. The findings of the Zone of Theoretical Visibility 2 (Figure 3 at Appendix C of the TVIA), which was verified during field survey work, represents the visual envelope of the Site and indicates no intervisibility between Hillingdon Court and the Site.</li> <li>As such no viewpoint from this or a nearby location was included. Representative viewpoints were selected following a comprehensive review of the surrounding area in terms of its townscape and visual amenity and in consultation with London Borough Hillingdon. Further information on the TVIA Methodology can be found at Appendix A of the TVIA.</li> </ul> <p><u>Limitations of the TVIA</u></p> <ul style="list-style-type: none"> <li>Townscape results from the interplay between the historic, physical and cultural components of the environment and as such the assessment of townscape and visual effects is a process closely linked with other topics, notably ecology and the historic environment. Whilst features associated with these topics can influence the character of the townscape and contribute to the sensitivity and value of townscape resources and visual amenity, the TVIA has been carried out in townscape and visual terms only, as an assessment of effects on heritage assets and their wider cultural setting (e.g. impacts on cultural and historic associations) and ecological assets are considered to be beyond the remit of this TVIA - and are covered with the respective heritage and ecological assessments that accompany the planning application for the Site. Whilst the TVIA does not assess direct or any other indirect effects on heritage or ecological resources, BMD have discussed the interrelationships of these topics with the respective consultants to ensure their</li> </ul>



	<p>contribution to the value of landscape / townscape character and visual amenity is considered appropriately.</p> <ul style="list-style-type: none"> <li>The TVIA is based on views from publicly accessible locations. Where an impact on residential and other private views (e.g. commercial properties) is noted this has, necessarily, been estimated. The viewpoints identified in the TVIA are illustrative of the worst-case potential impact from a representative range of receptors including residences, rights of way, public open spaces, private open space, commercial operations, the road and rail network etc. The TVIA does not necessarily identify all locations from where the Proposed Development would potentially be visible.</li> <li>This response should be read in conjunction with the following documentation submitted as part of the planning application for 4266/APP/2019/3088: <ul style="list-style-type: none"> <li>Townscape and Visual Impact Assessment, ref. BMD.19.020.RP.001, October 2019;</li> <li>Townscape and Visual Impact Assessment Addendum, ref. BMD.19.020.RP.006.A, December 2019;</li> <li>ZTV – 2020 Parameters Bare Earth, ref. BMD.19.020.TVIA.FIG.0003;</li> <li>ZTV – 2020 Parameters Visual Barriers, ref. BMD.19.020.TVIA.FIG.004;</li> <li>Hillingdon Gardens Verified Views, ref. V3D 170401, July 2020.</li> </ul> </li> </ul>
<b>Acoustics</b>	<ul style="list-style-type: none"> <li>Please refer to the Technical Note prepared by Spectrum Acoustic Consultants (ref. NDT6079/17025) dated 25 August 2020, submitted as an attachment to the EIA Screening Response Letter prepared by GL Hearn (dated 25 August 2020).</li> </ul>
<b>Archaeology</b>	<ul style="list-style-type: none"> <li>Please refer to EIA Screening Response Letter, GL Hearn (dated 25 August 2020).</li> </ul>
<b>Aviation safeguarding and security risks</b>	<ul style="list-style-type: none"> <li>Direct discussions with MoD DIO in relation to RAF Northolt have been on-going since 2017 in relation to the current and previous planning applications and have involved pre-application and post-submission discussions.</li> <li>The most recent exchange with MoD DIO in relation to RAF Northolt took place in August 2020. Written correspondence from the airbase to the Greater London Authority (dated 14 August 2020) confirms: <ul style="list-style-type: none"> <li>The MoD DIO has no height or technical safeguarding concerns;</li> <li>The Bird Strike Mitigation Strategy would be subject to conditions;</li> <li>The erection/operation of cranes would be subject to conditions;</li> <li>A Construction Management Strategy to be prepared in consultation with the MoD would be subject to condition.</li> </ul> <p>In conclusion, subject to the inclusion of the specified conditions in any planning permission granted, the MoD maintains no safeguarding objection to this application. A copy of the MOD Safeguarding – RAF Northolt Letter issued by DIO Safeguarding (dated 14 August 2020) is attached for reference.</p> </li> <li>The above should be read in conjunction with the EIA Screening Response Letter prepared by GL Hearn (dated 25 August 2020).</li> </ul>

We trust that the information above and attached sufficiently responds to the comments raised in OFRA's letter dated 18 August 2020.

Yours sincerely,



Partner, Planning  
 @knightfrank.com

The Rt. Hon Robert Jenrick MP  
Secretary of State  
Ministry of Housing, Communities and Local Government  
Fry Building  
2 Marsham Street  
London SW1P 4DF

11<sup>th</sup> September 2020

SW/NMc/75

[PCU@communities.gov.uk](mailto:PCU@communities.gov.uk)

Dear Secretary of State,

**Planning Application by Inland Homes: Greater London Authority Reference GLA/0995g  
Former Master Brewer Site, Freezeland Way, London Borough of Hillingdon**

I write as CEO of Inland Homes PLC in respect of our above planning application, which received resolution to grant from the Mayor of London on 3 September 2020 and which is subject to your holding direction.

**Inland Homes**

Inland Homes is an award-winning specialist house builder and brownfield developer, dedicated to achieving excellence in sustainability and design. We currently have 1,509 homes under construction across 14 sites in Southern England. We also have 5,090 homes in for pre-planning/planning determination and subsequent delivery across London and the South East of England.

We welcome the Government's house building agenda and its measures to support home building across England. We very much see the Hillingdon Gardens scheme as supportive of that agenda and are serious about seeing the delivery of much-needed affordable and market housing on this site.

**Hillingdon Gardens/Master Brewers Scheme**

The former Master Brewers site is a brownfield site that has been vacant for 11 years. It benefits from good local transport links and is in the vicinity of green space and infrastructure. This is exactly the type of site that can make a meaningful contribution to housing delivery in a sustainable way.

The scheme will see the delivery of 514 homes, of which 182 (35%) will be affordable. Biodiversity has been integrated into the designs, enabling us to achieve 26% biodiversity net gain and a high urban greening factor of 0.4.

We have acquired 1.26 acres of green belt land adjacent to the site, which we will protect in its entirety and which will not be developed as part of this scheme. In fact, in recognising the importance of green belt, we are proposing enhancements to it while opening it up to appropriate public access through our scheme.

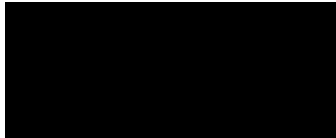
## **Planning Policy**

We have worked hard to ensure that the scheme is in accordance with important matters contained in local, London and national planning policy, and will provide a sustainable place for people to live.


While contributing meaningfully to the delivery of housing, we do not however consider that the scheme involves planning issues of more than local importance. It protects the green belt, while revitalising a vacant, brownfield site for the delivery of much needed housing.

We look forward to your early decision.

Yours sincerely



  
**Chief Executive**

CC: , Hillingdon Council  
Greater London Authority, London Borough of Hillingdon



# Ministry of Defence

# Defence Infrastructure Organisation

Safeguarding Department  
Statutory & Offshore

Defence Infrastructure Organisation  
Kingston Road  
Sutton Coldfield  
West Midlands  
B75 7RL

[REDACTED]  
Development Management  
Greater London Authority  
City Hall  
The Queen's Walk  
London  
SE1 2AA

[REDACTED]  
[REDACTED]  
[REDACTED]  
[www.mod.uk/DIO](http://www.mod.uk/DIO)

14 August 2020

Your reference: **GLA/0995g / 4266/APP/2019/3088**

Our reference: 10039796

Dear [REDACTED]

## **MOD Safeguarding – RAF Northolt**

**Proposal:** Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development-Construction phase query.

**Location:** Former Master Brewer site at Hillingdon, junction of Long Lane and Freezeland Way

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 05/08/20.

The applicant seeks full planning permission for the above proposed development at the former Master Brewer site, the application for which has been recovered from the London Borough of Hillingdon by the Mayor of London for his own determination. As part of this process and as the detailed design has emerged there have been amendments to the scheme.

The proposed development comprises the construction of a residential-led, mixed-use development including a number of buildings between two and eleven storeys, landscaping, SUDS and other associated infrastructure.

The application relates to land close to RAF Northolt, an airfield that accommodates units from all three-Armed Services and provides a home for both 32 (The Royal) Squadron and 63 Squadron RAF Regiment (Queen's Colour Squadron), during the 2012 Olympics Northolt hosted four Typhoon fighter aircraft. The application site is located 1.96km west from the centre of the runway at RAF Northolt and approximately 1.1km west of the threshold of runway 07/25. The site occupies the statutory height, birdstrike and technical safeguarding zones surrounding RAF Northolt.

### **Aerodrome heights and Technical safeguarding zones**

The proposed development site occupies the statutory aerodrome height and technical safeguarding zones that ensure air traffic approaches and the line of sight of navigational aids and transmitters/receivers are not impeded.

The airspace above and around aerodromes is also safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre.

**There has been a slight increase to the heights of some of the buildings within the development and having performed the necessary technical assessments, I can confirm the MOD has no height or technical safeguarding concerns.**

### **Birdstrike safeguarding zone**

The application site is also within the birdstrike safeguarding zone, within this zone, the principal concern of the MOD is the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.

Several of the buildings are proposed to have brown or green roofs of varying design, including brown roofs and ornamental roof terraces. These have the potential to be attractive to roosting / nesting hazardous birds such as large gulls.

The drainage strategy for the site includes green roofs, permeable paving, rain gardens and swales. Other than the green roofs, the other aspect of this which has the potential to attract or support hazardous birds are the swales. These are to be planted with a wetland meadow mix comprising a range of flowering plants and grasses and would appear to be generally dry. As long as they are usually dry, and the planting is maintained then this should prevent these features resulting in an attractant for hazardous birds.

The developer submitted a Bird Hazard Management Plan (BHMP) for the full application, to mitigate any potential birdstrike risks / hazards. Previously, having reviewed the plan the MOD confirmed the provisions set out within the BHMP would provide a robust and effective mitigation of the risk posed by the development and it was requested that any permission issued is subject to a condition requiring that the development is carried out strictly in accordance with the submitted BHMP and that those measures set out within the BHMP are implemented in perpetuity.

Minor amendments to the landscaping plans have been reviewed and it has been determined these changes should not impact on the potential for the site to attract or support hazardous birds.

On review of the BHMP and further to our previous response dated 13<sup>th</sup> November 2019, the MOD request the BHMP be amended to include the log book being made available for the MOD to view and/or be submitted to RAF Northolt annually, and subject to health and safety limitations there should be means of entry for the MOD or their nominated representatives to access the roof spaces to check for hazardous birds. The BHMP should be in perpetuity and linked to the site and not the owner. Also, given the proximity to the threshold of the runway at RAF Northolt, some means of

review together with the MOD would be advisable, with a commitment to carry out additional control or proofing at the reasonable request of the MOD. In addition, if large numbers of birds are to be dispersed (more than ten), Air Traffic Control at RAF Northolt should be informed by telephone beforehand, with the number always being available to persons carrying out checks or bird control.

**In summary as long as the swales are generally dry and the BHMP with the MOD required amendments noted above is included as a conditional requirement (and in perpetuity) as part of any planning permission granted, the MOD has no objections to this development.**

### **Cranes**

The MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect the performance of the Precision Approach Radar (PAR) and air traffic safety. If the redevelopment of this site does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures.

The MOD would request that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

### **Submission of a Construction Management Strategy**

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence.

The Construction Management Strategy shall cover the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting).

The approved strategy (or any variation approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence) shall be implemented for the duration of the construction period.

### **Reason:**

To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

**Subject to the inclusion of the specified conditions in any planning permission granted, the MOD maintains no safeguarding objection to this application.**

I would be grateful if you could confirm receipt of this letter and confirm that conditions meeting the MOD's requirements are included in any consent granted.

It is important the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Hillingdon Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



DIO safeguarding



# Ickenham Residents' Association

General Secretary: 6 The Chase, Ickenham, Uxbridge, UB10 8SR



15 December 2019

Our Ref. : PD/JD/HT/CM/DJ/JR-HR

██████████  
Head of Planning  
London Borough of Hillingdon  
Civic Centre  
Uxbridge  
Middx. UB8 1UW

**SUBJECT:**                    **Application Reference 4266/APP/2019/3088**  
                                 **Re: FORMER MASTER BREWER SITE, FREEZELAND WAY, HILLINGDON**

**Proposal: Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.**

Dear ██████████

On behalf of the residents of Ickenham, we object most strongly to this inappropriate development proposal at the former Master Brewer site.

We are making our initial objection now, despite not having received additional information and drawings requested at our meeting with London Borough of Hillingdon re this proposal. In addition, our objection on traffic grounds will need to follow as the appendices in the planning documents are incomplete.

This application represents a proposal to squeeze as many flats onto the site as possible. Without the constraints of the RAF Northolt flightpath, how many storeys would have been proposed? 20? 30? These are tiny boxes in the sky, not the homes that local people strive for. Most worryingly, the excessive density and lack of amenity space seriously risk the development creating a future slum.

## **Visual Impact**

This proposal is totally out of character with the surrounding area in relation to its size, bulking, mass and design. It would be incongruous placed alongside all other buildings in the immediate area, and completely alter the skyline. This size, scale and bulking of the proposal is more akin to a central London site, not a 'Local Centre' as defined in the UDP (Saved Policies). At a maximum height of eleven storeys it is higher than most of the flats and Offices in Uxbridge, an area designated a Major Town Centre.

Page 1 of 7

E-Mail Address: [ickenhamresidents@hotmail.com](mailto:ickenhamresidents@hotmail.com)    Website: [www.ickenhamresidents.co.uk](http://www.ickenhamresidents.co.uk)

Twitter account [www.twitter.com/IckenhamRA](https://twitter.com/IckenhamRA)

Affiliated to: Hillingdon Alliance of Residents' Association. Member of: London Wildlife Trust and Herts. & Middx. Wildlife Trust and London Green Belt Council    LBH Planning Letter 2019 3088 622 15.12.19 Former Master Brewer Site

The Master Brewer Site sits adjacent to important views from immediately adjacent, and distant, views of Green Belt land, is adjacent to a Local Conservation Area, and nationally listed properties, within the 1 Kilometre radius. The existing buildings in the more immediate vicinity of the development site are mostly 2-3 storey shops/flats built in a clearly residential style and 2 storey houses.

The Development will be the first buildings to be seen on arriving in Hillingdon from the west on the M40/A40 roads transforming from open country side views to a brick collection of monolithic, 5 to 11 storeys, up to 30m, tall massive blocks of flats before proceeding back to open country again on the A40 past Northolt Airfield on one side and open fields on the other.

At a meeting with the developers, it was argued that, as the tallest buildings were to be built into the embankment of Long Lane / Hillingdon Station, the high-rise impact would be mitigated. However, as our experience at the West Ruislip Air Base proved, the embankment of the hill provided little or no mitigation to the height at all and demonstrated the overbearing and oppressive effect such developments have on the street scene.

Previous attempts to build on both this site and the Ruston Bucyrus site opposite have either been withdrawn (Ikea) or restricted in height. The previously approved Tesco application with a Hotel block on the corner of the Master Brewer site was restricted/reduced following objections, to a maximum of 6 storeys”.

Item 1 for refusal in the Officers report stated that :-

*“The development, by virtue of its overall scale, bulk of built development and associated infrastructure works, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character of the North Hillingdon Local Centre or compliment the visual amenities of the street scene and openness and visual amenity of the Green Belt and would mar the skyline”*

The major difference between this application and the previous, in relation to the issues above is that THIS APPLICATION IS EVEN BIGGER and we feel the Officers report has not in any way been mitigated.

See attached photographs and viewpoints regarding Visual Impact.(New MB Collage Nov 2019)

**Community facilities:** The development of the Master Brewer site offers an excellent opportunity to establish new much needed community facilities in the area. A community centre and/or a pre-school would satisfy obvious local needs. The applicant seems to have not considered any of these matters.

**Gated communities:** Several recreational spaces within the proposed development seem to be ‘gated communities’. While we understand the desire to ensure that the development is safe, there is no impediment to securing this outcome by sensible design. Gating parts of the development will result in segregation. We want the new development to form part of the existing community. A gated community risks creating a ‘them and us’ mentality.

**Access to green space:** Clear assurances were given to the Residents Association by the developers that access to a new green belt park would be included in proposals. They insisted that an agreement with adjoining landowners had been secured. We view the relationship between the development site and the adjoining green space as an important design consideration and are hugely disappointed that the developers have failed to deliver their commitments on this matter. Furthermore we feel that the developers have acted disingenuously by using images of open access from the site to the green belt

area on their design and access statement. It seems that no access has been agreed. No new park is planned. These are broken promises.

**Ambiguity on green technology:** The waffle provided in the application on green energy is extensive. There seem to be no clear aims or targets, just 'ambitions' which we suspect will be ignored

**Pedestrian Safety:** There is much emphasis in the application to restrict car ownership, by restricting car parking space and increasing cycle spaces.

This implies that a large majority of the 1200 to 1500 inhabitants will require pedestrian access and egress to and from this ISLAND SITE by way of pedestrian crossings in order to 'safely' cross the surrounding major carriageways.

From previous studies we have carried out, we know how long it takes to traverse these crossings 'legally' and there will be a great temptation to 'take a chance' and cross one of the several MAJOR roads, to access shops, transport or the station. This we believe will constitute a major safety hazard. We know already the serious limitations on traffic flows and congestion at the Hillingdon Circus junction and ANY increase in the meagre timings for pedestrians will seriously impact further on such traffic.

**Recycling facilities:** The application seems to fail completely to recognise the opportunity to install a sensible system to allow residents to recycle. Recycling rates across flatted development in Hillingdon are consistently low...the traditional system of providing communal bins at ground level has been abandoned in many areas of the borough, leaving residents without 'curb side' options. All over London new developments are implementing modern systems to address these sorts of issues, but again, this proposal has failed to recognise local issues

**"Series of tall buildings":** The only suitable areas for tall buildings are Uxbridge and Hayes - clearly unsuitable in this location.

**Design:** we were impressed by the contextual analysis of the local built environment character. We were not impressed by the way this analysis was represented in the design. We found only very limited evidence of this, with some pointy roofs on some of the blocks that back onto the A40. The focal point building on the corner of the Circus lacks visual interest and the arched design for the non-residential units seems completely out of context for the area. The nearest commercial railway arches are at Ruislip Gardens, maybe there was some confusion with the 'gardens' reference? The design seems to lack permeability and character. It is not clear how residents would access the station, and it is not clear whether improvements to the pedestrian access to the existing shops would be improved.

To deliver residential densities above those set out in the planning policy for this site, we would expect to see a genuinely outstanding design. The proposed design leads on creating a 'garden community' with green infrastructure flooding in to the development from adjoining green space. Even if this were true, the various other issues with the proposed scheme would provide sufficient grounds for refusal. But this development does not seamlessly flow into a new park. Land ownership and access issues are not addressed. No funding to create or manage a park is mentioned. 'Hillingdon Gardens' is actually 'Hillingdon Towers'.

We ask the developers to go back to the drawing board. They confirmed to us that they were aware of the community masterplan that several local groups pulled together as part of the emerging Ickenham Neighbourhood Plan. We suggest they start with that document and engage sensibly and honestly with local people and a sensible compromise can be found.

## Density of the proposed development

The application site has an area of 2.48 hectares and a PTAL of 2-3. There are two site categories in the Local Plan relating to PTAL 2-3 sites:

1. Other Town Centres
2. Residential Areas with suburban character within 800m of a town centre

The site in question is not a town centre nor within 800m of a town centre. However it can be described as having a suburban character being opposite the row of two-storey houses in Freezeland Way and close to the suburban style shopping parade of Hillingdon Circus. Therefore this is the most appropriate category which has a density recommendation of 50 -110 units per hectare for a development of mostly flats or 124 to 273 units for the whole site. This is consistent with the Site Allocation of 250 units for this site (but including the extra strip of land adjacent to the site next to Freezeland Way ie 3.3 hectares or 76 units per hectare) in the Local Plan Part 2.

However the proposed number of units is 514 units, around twice the maximum appropriate density for the site. Even if the site were to be considered a town centre (which it is not nor would it be recognised as such in the Local Plan) the maximum would be 421 units.

It should further be noted that this is a site designated for residential-led mixed use. The proposal has a derisory 2% of the area reserved for uses other than residential. Were a more reasonable minimum of 10% allocated to other uses, then the maximum of 273 residential units would be reduced to 245, again wholly in keeping with the site allocation.

If the proposed development kept to this reasonable maximum of 250 residential units it would enable the maximum height of the buildings to be reduced to 5 storeys rather than the 11 storeys proposed. In the Local Plan the site is not considered suitable for high rise buildings.

Therefore the application should be rejected on grounds of over-development.

## Traffic

To repeat our concerns - it is clear that a development of this magnitude would generate considerable traffic movements in a junction that is already frequently at capacity.

**The proposal still does not show (through lack of traffic simulation evaluation) that it complies with UDP AM7, as follows:**

**UDP - am7 the Local Planning Authority will consider whether the traffic generated by proposed developments is acceptable in terms of the capacity and functions of existing and committed principal roads only, and will wholly discount any potential which local distributor and access roads may have for carrying through traffic.**

**The local planning authority will not grant permission for developments whose traffic generation is likely to:**

- (i) **unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network;**

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## Trip Generation

In the initial proposal the following was stated.

Trip generation (6.2.1) is given to suggest how many extra car (etc.) journeys will be made. This is given in Appendix H. Actually, it appears to be given in a Trip Generation document (Part-6), page 2. Three sites are given as the basis for trip generation using TRAVL. This is due to the following request by TFL as commented in 1.2.1.

“1.2.1 Following the Transport for London (TfL) pre-application meeting held 23rd February 2017, TfL requested a further review of the trip generation methodology is undertaken, specifically in relation to reviewing the availability of newer survey sites. The following comment was received from TfL in the formal TfL pre-application advice letter:

Person trip rates have been obtained by selecting three sites from the TRICS database. Although the resultant trip rate looks reasonable, TfL requests that the database is interrogated further for newer comparable surveys.

Data from the 2011 census should be used to derive residential mode share, using the output area. Public transport trips must be broken down by mode and direction.”

- There is no justification as to which three sites were taken. The selected set could have been selected with significant bias. This would skew the results in the applicant's favour.

In the new version the following is stated concerning the TRICS site selection (5.2.4).

“These sites, though not directly comparable with the proposed development with regards to number of dwellings or parking ratio, are recently built developments in similar outer London locations that are considered representative of the forthcoming scheme.”

This basically says the TRICS data and conclusions made from these are worthless (e.g. the rest of the discussion (5.3.2) onwards). It is highly likely these were selected to give the best outcomes regardless of actual reality.

## Vehicular Trip Distribution

Again, from the previous objection...

- In 6.5.1 it is mentioned that a trip distribution and assignment methodology has been agreed with TfL which follows the methodology used in the 2012 Transport Assessment (correspondence in Appendix A (actually Part 6)). It is stated that “for consistency” the same development trip assignment turning proportions identified in that assessment (which were based on turning counts) have been used for this assessment. As such, it is envisaged that 25% of traffic will arrive / depart from the north, 25% from the east, 25% from the south and 25% from the west.
- This is an arbitrary assignment. It is our experience that an equal 25% split is far from reality. Evidence from a real survey is needed to support these figures.
- Further observations on additional trip justifications: 6.6.3 mentions the additional traffic from the RAF Uxbridge development. However, there is no real justification for the figures. This is the same with the RAF West Ruislip development (6.6.4) and the Swakeleys School expansion (6.6.5). There appears to be a failure to account for these properly.
- In 6.6.8 they claim that the above accounts for additional trips and then claim in 6.6.9 that as an office development at HC will not be going forward these will be less. This makes no sense as the above is independent of the office development.



In this version this is referred to in 6.2.1.

“6.2.1. As part of the Transport Assessment submitted for the 2017 application, extensive highway modelling was undertaken with TfL to assess the impact of the scheme on the highway network. The proposed development has therefore been compared against the 2017 scheme to assess if further traffic modelling is required.”

This fails to address the above comments. Further...

“As shown in Table 6-1, when compared with the 2017 scheme, the vehicular trip generation associated with the proposed scheme reduces marginally during both the AM and PM peak hours.

Based on this, it is considered that the current scheme proposals would have a marginal benefit in terms of highway impact during peak hours when compared with the 2017 scheme. It is therefore considered that the extensive traffic impact assessment work that was undertaken during 2017 and 2018 in connection with the previous scheme and reviewed in detail by TfL remains valid for the new scheme, and therefore no additional traffic impact assessment work is required in connection with the proposed scheme. The Traffic Modelling Addendum which outlines the impact assessment is contained at Appendix L, whilst a Hillingdon Circus Signal Optimisation note is contained at Appendix M.”

THERE ARE NO APPENDICES L AND M !!! We find it extremely concerning that these are not included. Perhaps these are so weak that they have been intentionally hidden. As you can see from the note below there was a promise to share the results of the traffic modelling – this has NOT BEEN DONE.

### **LINSIG/VISSIM Assessment (section from previous proposal)**

- In 8.1.1-3, it is stated that “The impact of the Proposed Development on the surrounding road network is currently being assessed using the traffic modelling software LinSig and VISSIM. The modelling assessment work is ongoing with both TfL and LBH, and a separate addendum traffic modelling and impact assessment report will be issued separately once the work has been completed.”
- It is impossible and unfair to expect to comment on these models and their results. This Association has traffic simulation experts who understand these models and their assumptions. In the past attempts to model and simulate HC have been extremely poor and misleading. It is therefore not enough to say that these will be done later. Both need to be scrutinised in this process. Observation - This makes it extremely difficult to work on as the models are not complete or reported on.

It is concerning that the VISSIM model only appears to address the manual count peak (on a Thursday am and a Saturday pm). “A VISSIM microsimulation model has been built, calibrated and validated to represent the traffic conditions recorded during the traffic surveys (12th January 2017).” The VISSIM model covers two hours in the AM peak and two hours in the PM peak (8.7.1). There is no sensitivity analysis here. It again seems to assume that output roads never block. It is impossible to tell as the model report is not included as noted above.

### Noise Pollution

The area of the proposed development has already high levels of noise, again due to excessive road traffic usage, particularly the M40 corridor. The worst congestion occurs at peak times morning and evening. Loudness of noise is subjective, but it is accepted that an increase/ decrease of ten decibels corresponds to a doubling / halving in perceived loudness. External noise levels are rarely steady but rise and fall according to activities in the area. It is likely that the existing noise levels combined to that of the proposed development would be above the Council's recommended guide lines. We consider that the activities associated with the proposed development would increase noise levels and cause disturbance to local residents both existing and new.

We feel, where both air quality and noise are concerned, the development proposals do not protect amenity levels of either existing local residents or future occupants in the new development.

### Local facilities

Whilst not a specific planning objection, we feel that the already oversubscribed local facilities, such as schools, doctors' surgeries, dentists and so on are simply not going to be able to cope with such a massive influx of population in this location.

Given ALL of the above *very detailed and carefully researched* areas of concern and objection, we ask the LPA to *heavily reject this unwelcome proposal* and ask the developer to come back with a proposal more fitting to the local area and with greater concern for our existing environment, and, for those who may choose to live here in the future.

Yours sincerely,



GENERAL SECRETARY  
ICKENHAM RESIDENTS' ASSOCIATION



Encl. New MB Collage November 2019

Copies to: Cllr. Ray Puddifoot  
Cllr. John Hensley  
[Redacted] – Case Officer

Boris Johnson PM  
David Simmonds MP



## Neighbour Representations (Master Brewer)

184	<p>This development in my opinion is excessive in its scale and bulk (too dense and too many storeys), and would have an adverse effect on the visual amenity of the area as a whole. One of the major concern is the impact on the surrounding highway network and level of traffic. This massive development will put a additional strain on public services, school places for local children, GP access etc.</p>
	<p>I'm really not happy with this monster build It is in a middle of a very busy junction and next to a very busy Motorway it should never be allowed for construction I think would be much better of as a green and will help with all the pollution that the existing Traffic is causing! It will be horrible for the local people.</p>
	<p>Planning and Building Control, I wish to object to the above referenced Planning application. I have been a resident of the area most of my life and I feel that the vehicle traffic in the area of Hillingdon Circus at present is dangerously high. This proposed new development will add to this problem of traffic congestion we face on a daily basis. Pedestrians attempting to negotiate through Hillingdon Circus are in danger regularly during peak traffic times. Referring to the proposed site layout one can see that there are only one enrtly and exit from the site and it is too close to the already congested Hillingdon Circus. This proposed development will add significantly to this danger. Site construction traffic for the period of construction, retail deliveries, and residential traffic will all contribute to an already unacceptably dangerous vehicle traffic volume. All one needs to do is observe the high volume of traffic in the morning and evenings to understand the problem we residents of the area are confronted with. Queues of vehicles block many roads in the area leading to the junctions at Hillingdon Circus. Fatalities have occurred due to this dangerous level of traffic. I also wish to object on the grounds that the proposed application has increased the residential units from the previously refused application from 437 to 514 and the maximum height of 9 storeys to 11. I, therefore, request that Planning and Building control reject this application.</p>
	<p>Remember 9/11 in the USA;that's what happens when a plane hits a multi storey block; heed the warning an accident waiting to happen.</p>
	<p>The area is already heavily congested and this crossroads is a particular pinch point from 6am and 4pm every week day. Adding a further 500 + dwellings plus business units will be horrendous. There is parking for a third of the dwellings so where are the rest of the cars going to go? They will be parked on the roads, causing more chaos.The construction will be long and highly disruptive, noise and dust pollution will impact the local community. Deliveries and in particular tipper lorries will block the roads during rush hour. We will be left with an eyesore, seriously 11 floors?? There is nothing in the area even half this height, not really in keeping with its environment</p>
	<p>Traffic situation is bad already. This will make it worse.</p>
178	<p>The area is already heavily congested and this crossroads is a particular pinch point from 6am and 4pm every week day. Adding a further 500 + dwellings plus business units will be horrendous. There is parking for a third of the dwellings so where are the rest of the cars going to go? They will be parked on the roads, causing more chaos.The construction will be long and highly disruptive, noise and dust pollution will impact the local community. Deliveries and in particular tipper lorries will block the roads during rush hour. We will be left with an eyesore, seriously 11 floors?? There is nothing in the area even half this height, not really in keeping with its environment</p>
	<p>THis is a crazy development , the area cannot sustain a development like this 1) Traffic is heavy from 0600 to 22.00 every day the a40 gets blocked and the pollution in the area will be very high and with the number of school children within a 3 mile radius , the out breaks of asthma related illnesses will double . 2) The medical centres cannot hanlde any more</p>

	<p>patients as it is 3) schools are full, without enough places now , 4) question of cars 500 dwellings this will mean at least another 300 cars to find parking spaces . 5) the last 2 applications have been refused and this one is even bigger Please Please do not allow The Hillingdon borough is being crucified this will just bring the death sooner than later 6) this development along with HS2 will make Hillingdon borough 1 of the most polluted boroughs in the UK</p>
	<p>This planning proposal is a massive over development. The 11 stories is completely out of character with the area. The density of dwellings is far too high given the size of the site and problems with vehicle access. The effect on Hillingdon Circus congestion will bring the whole area to a standstill during main traffic times. This will back up onto the A40 and beyond. The very limited parking provision proposed will put even more pressure on local parking outside the development.</p>
	<p>Traffic, traffic and more traffic. How are surrounding roads going to manage all those extra vehicles. Most residents will probably have 2 cars per household. Long Lane is much of the time just one big car park as it is. Cannot see how Long Lane can have anything done to it to accommodate more traffic. Queues to exit Ryefield Ave and Granville Road are ridiculous at school and rush hour times. Going over to Ickenham/Ruislip are worse than ever and build up starts much earlier than it used to, prior to building of new house and flats in that area. Whoever thinks up the idea of building estates, turning one house into 4/5 and more apartments needs to try and travel around the area, particularly at times mentioned above.</p>
	<p>When is the London Borough of Hillingdon going to stand up for the residents of this borough regarding these outrageous planning applications. You have already allowed this area to be blighted by giving planning permission to the development of the former Dairy Site in Long Lane, giving in to the blatant greed of a developer determined to over develop a small site in the middle of a residential area, shame on you. This application for the former Master Brewer site is yet another example of the blatant greed of a developer who clearly has not the slightest interest in the harm that this development would do to the local area and the local community. Many people are prepared to consider development of this site but to date every developer who has put forward a scheme has simply been too greedy and has proposed schemes that are no more than a massive over development based only on profit and not on what this area needs. It is time that the LBH planning department recognised the aforementioned issues and stop putting local residents through the stress related to considering these schemes that will destroy the neighbourhoods that we live and work in and actually care about.</p>
	<p>As identified there are busy roads at this junction. I would like to see more concrete steps taken to reduce the impact of heavy traffic in this area when the development goes ahead. This main change in this latest application is linking the development to the Calendine Route and Hillingdon Trail and all the green spaces in the locality. This does not directly reduce the impact of heavy traffic in the vicinity of the development. As North Hillingdon is a residential area the council and the developers should take further steps to reduce heavy cut-through traffic where possible and greatly improve the environment for walking and cycling. As a resident of Hercies Road, better walking and cycling links between the Hillingdon Gardens Development and Uxbridge Town Centre (with the link to Calendine Walk and the Leisure Centre) would make the area more pleasant. I would like to see Cycle Lanes and a 20 mph driving zone on Hercies Road. This would encourage greater walking and cycling, reduce traffic noise to make the street scape more pleasant, reduce accidents and put off drivers looking for a quick rat-run to the A40. Further as the developers identify Court Park and Hillingdon Farms open area as places for recreation. The pathways from Hercies Road to these areas could be better signed, lit up and paved. The alleyway from Hercies Road to Sweetcroft Lane/Court Park needs improvement.</p>

	<p>I feel that the height of the structures will be an eyesore and will not keep within the overall appearance of the area. The increase in the number of residents will not only put extra strain on a very busy health system of GP's but, along with the extra vehicles relating to these residents will put extra strains on the very busy and contested road system in the area, this is not taking into consideration the extra traffic congestion that will result by HS2 vehicles, plus extra traffic resulting from whatever the commercial units will be used for. This proposed development appears larger than previous applications that were rejected. I am fully against the application.</p>
188	<p>There is already traffic at rush hour and school run. I feel the road infrastructure is not sufficient to support 500 plus units and commercial. School space are already at a max. It is too big of a development for a small area.</p>
	<p>Not enough parking. There needs to be at least the same amount of parking as there is dwellings. Parking is a huge problem in the area and this will lead to extra congestion. To overdeveloped. Local doctors and schools are full.</p>
	<p>The proposal of residential units including an 11-storey building will increase congestion and pollution on or near Green Belt land. Hillingdon Circus has become a 'bottleneck' particularly during peak morning and evening rush hours. The proposal would be 'unsympathetic' to the area and 'mirrors' ubiquitous, anonymous developments along the Metropolitan Line which, in the large part, are purchased by private landlords. We therefore ask Hillingdon Council to reconsider this planning proposal in light of these points, local residents and the environment.</p>
	<p>WITH 514 UNITS OF BETWEEN 2 AND 11 STOREY HIGH THIS WOULD IN EFFECT ADD A MINIMUM IF 1500 NEW OCCUPANTS TO THE SITE AND THE LOCAL INFRASTRUCTURE CANNOT SUPPORT THIS. CONGESTION ON LONG LANE IS ALREADY BAD AND HILLINGDON STATION STRUGGLES TO KEEP UP WITH EVER INCREASING NUMBERS OF COMMUTERS. 11 STOREY BUILDING WOULD BE DETRIMENTAL TO THE AREA AND IS MUCH TOO HIGH TO EITHER BLEND IN OR ENHANCE THE AREA.</p>
222	<p>The design differs significantly from any housing in the vicinity and would completely change the character of the area due to an excessive number of units. The proposed development is excessive in its scale and bulk (too dense and too many storeys). The proposed development would be out of keeping with the design and character of the existing dwellings in this area, and would have a significant adverse effect on the visual amenity of the area as a whole. The impact on the surrounding highway network traffic would be very negative: Current traffic levels on Long Lane, a main north-south traffic artery for the borough, are extremely high with long queues stretching from Hillingdon to Ruislip and vice versa during rush hour. The additional traffic and any traffic light changes to the Long Lane / Western Avenue /Freezeland Way signals resulting from the proposed development is likely to make things even worse. There is too little consideration for Green spaces and environmental quality of life for the new residents and for the many existing residents in the neighbourhood. Please can the applicants and planners also think about the impact of the planned scheme on additional capacity and resources that will be required. There is an ever increasing number of developments in Ickenham and Hillingdon which puts a serious strain on public services: -Public transport capacity -Medical centres and dentists -Hillingdon Hospital capacity -Police capacity -School facilities</p>
	<p>Not enough parking, there is already problems with parking on Hercies road, this will only worsen the situation. Will create too much traffic at the Hillingdon A40/Long lane junction and the buildings are too high, completely out of character with the local area.</p>
	<p>GP's, hospitals, schools etc are already over stretched. To build more housing, without expanding or improving these services would be irresponsible &amp; would put a larger strain on the area.</p>
	<p>The local area CAN NOT sustain another development of this size without additional</p>

	infrastructure (Schools,GP etc) the road network can not take additional vehicles (even if this is built for non car users it wont stay that way) Too imposing. With the upcoming HS2 madness this can not be developed at same time. Need less density housing.New Homes are important and necessary but real homes in a community setting NOT mass housing to maximise profit.
	A development of this size and magnitude will bring with it an overwhelming strain to local roads, doctors, schools and other public and private services. 11 storeys is unnecessary and will also cause a visual deuteriation to the area. This application should be rejected due the negative impact on the local community.
	Area is already congested, Worried about the services like doctors hospital can cope, traffic is already at stand still at peak times. Also with the development - the Diary which is in progress of being built that is going to add to existing traffic. Not good for residents as more car polution an fumes bringing down air quality
	This area is already subject to huge volume of traffic and congestion. Consideration needs to be given to the road planning with any such application. I am not against a residential development, just a residential development of this scale.
	Year by year Ickenham is being degraded and ruined by unnecessary intervention....lots of new residential units being created already near the West Ruislip end, theHS2 monster machine, Hillingdon circus junction is horrendous already. Congestion is at an incredible high and peak time driving is like a manic circuit around Ickenham wide, especially the Freezeland site circus. It is very dangerous for school children and a major health hazard, This project is only going to compound that and make things from bad to worse, It is going to devalue ickenham and property prices are likely to suffer. Please do not allow this planning proposal to proceed
211	These many flats and commercial property you have mentioned, is there space for it? The pollution in the area taken into account. The traffic jam and noise/air pollution. How many more apartment do we need to have in this area?
	The traffic congestion alone on Long Lane is enough to decline this! On top of that you have additional pressure on schools, GOs (where waits are already 5 weeks) and Hillingdon hospital (where urgent appointments already take 9 months).This area is already heavily congested.
	Once again another development that affects the infrastructure of the local area , considering there will be 514 units if you average 4 people to unit there will over 2,000 people coming into the area , once again the developer does all the pretty things like landscaping central space cycle and predestination links , does not provide new doctor surgeries I currently wait 2 weeks to see my local doctor the schools are already oversubscribed the area cannot absurd all these extra people , also 165 car parking space if everyone in the 514 units has 1 car where will the other 300+ cars park, please refuse planning permission
	Too high and too dense, when compared to the surrounding area, totally out of character for the area
	The propasal to house in over 1000 people on this site together with commercial units is totally unrealistic. The pressure on local schools, doctors etc would be extreme. The idea that by NOT providing parking spaces will reduce the number of vehicles is misguided to say the least. I know that there will be public transpot nearby but this will only have a limimited affect on car ownership. Realisticly there should be at least three times the number of spaces. The lack of parking will have a very detrimental affect on the surrounding roads. I have no problem withe the development of the site for housing and commercial, but this must be at a sensible level and take into account the quality of life of the surounding area. I trust that the planning commitee will have the good sense to reject this proposa.

	<p>My objections are as follows: - 11-Storey buildings are out of character when compared to other building in the area. - The current traffic on that junction in the morning and evening rush hours is already extremely congested and this proposal will just make it worse. We all know that it doesn't matter what developers put as transportation proposals, people like their cars and there is always more than one per dwelling. - The doctors surgeries in Freezeland Way and Long Lane are already difficult to get an appointment with. Again this will make the situation worse. - School in the area are already heavily over subscribed. Families already in the area will have smaller chances to get into good schools. - Serious crime in the area is also in the increase. Do you really want to allow an 'estate' to be built that can take advantage of the proximity to county lines</p>
	I would love to see new buildings in the area,
	<p>Hillingdon Circus gets congested with traffic at various times of the day even on Sunday. Unless something is done by the council to improve on this situation then allowing more housing in the area is creating more pressure on traffic, schools, hospitals, U2 bus service and doctors surgeries. Therefore we strongly oppose this development until such time Hillingdon Circus is drastically improved traffic wise, and also the bus services</p>
	<p>Density of scheme, height of taller building, strain on local services, underground pipe services, not enough parking spaces for amount of dwellings. As a Long Lane resident I see first hand the congestion of traffic. The development would make the situation worse. I am totally against a development of this size.</p>
202	<p>The density of this project will cause issues in the local area in terms of traffic and strain on already strained amenities. The traffic on long lane is already impossible in the morning especially when you turn on from Ryefield Avenue and Sweetcroft Lane, this many residential units will add to this situation and make travelling to school and work harder for the local residents. Additionally we already have an issue with school spaces in the borough and this will add an unnecessary burden on these as well as a further burden on the already stretched Hillingdon Hospital. A development like this is an overdevelopment in an area like Hillingdon who can't cope with the addition of this many more people and we will suffer just as other areas where overdevelopment is rife and the local residents are left to deal with the consequences. Gridlock traffic, loss in standards in local schools, queues going out the door at the local A &amp; E.</p>
	<p>11 storey buildings are too high and will make the development look like a block of flats. In my view this is not in keeping with the area. Also 514 units (assume flats) will mean circa 2000+ additional people in an area where the infrastructure (schools, doctors, dentist) are unable to support.</p>
	<p>The buildings are far too high and out of keeping with the area, there are insufficient parking facilities. There are far too many proposed dwellings where the impact on local travel amenities will be impacted by the volume of inhabitants.</p>
	<p>I do not believe the scale of the development is in keeping with the neighbourhood. I also have concerns about the size of the development and the lack of car parking, especially if the car parking is shared with commercial premises as well as the residential. The local roads are also gridlocked already during rush hour and this development could make the situation worst without a redesign of local traffic management</p>
	<p>Dear Sir/Madam, the height of this development would be out of line with the surrounding properties, the car parking for 514 units would be at least treble the 165 proposed, there are no infrastructure proposals to allow for a possible 1000 new residents.</p>
	<p>The area is already highly congested and increasingly the population would cause more and lasting damage to the rest of the residents already living here. We do not have the infrastructure to accommodate more people in the area, struggling schools already full, doctors surgeries are becoming more difficult to arrange appointments. The rise of pollution cannot be justified</p>

	I would like to object against the proposed development for the following reasons :- 1) The sheer size of the development would be an incongruous blot on the landscape 2) 11 storey buildings would look severely out of place with the surrounding area 3) I have severe concerns around the traffic infrastructure ability to support any further influx of traffic in and around the Long Lane area which is nearly intolerable at present 4) Also have concerns around parking - if 511 dwellings and only 160 parking spaces where will people park and this does not take into account visitors 5) Ickenham has always been regarded as a village this development combined with recent over building in the area is destroying this ethic 6) I have reservations around pollution with the increased traffic influx this will bring about 7) Local infrastructure ability to support these new residents - doctors/dentists 8) Also have concerns on sustainability of local high street shops which again will ruin the village ethos
	I can't believe this is a serious application, in an already overcrowded area an application has been put forward for 514 new residences which would bring at least 1000+ new people to the area. Also for these 1000+ people 165 car park spaces are being provided. On top of all of this The extra traffic would make commuting in the area even worse than it is now, and add to an already high air pollution. I can't say in words how much I'm against this!
	The buildings are too high and out of keeping in the area
	11 storey buildings are completely out of keeping with other residential buildings in this area. 514 units and only 156 car parking spaces - nowhere near adequate. Where will all the extra cars be parked? Potentially a huge number of extra health and school/college Services required. Northolt airport will presumably object to having tall buildings on the perimeter of the airfield! The area around Hillingdon Circus, especially Long Lane is normally gridlocked and more cars and commercial vehicles will make the situation much worse. Access and egress of vehicles from the proposed site will increase congestion at the junction.
	I don't believe sufficient thought has been given to the impact this will have on the, already overstretched, local resources, such as GP Surgeries, Hospitals and Schools. This development will house approx 1000 people and they will need access to these services, which are already struggling to cope.
	Traffic congestion within the Oak Farm estate, parking allocation 0.3 spaces for the new estate, they will be parking their cars on the Oak Farm estate. The station car parking too expensive people already parking cars around the Oak farm estate. An extensive survey of the road layout of long lane, park way and all the surrounding roads needs to be undertaken, too confirm the effects upon the area and all the local schools and nurseries. There are properties on the Oak Farm estate with more than 2 cars affiliated to the address causing further congestion?
234	As previously stated the current road infrastructure cannot withstand any additional traffic in Long Lane and surrounding areas. Already during peak times Long lane jams both ways from either Ruislip or the uxbridge road. Added to which a new development has already started on the old dairy site which will add to this problem
	Local infrastructure can't cope with more people, cars, traffic of all kinds.
	This is a gross over development of a small site, the height and size of the buildings are not compatible with the local area. There are insufficient parking spaces. The sewer system is unable to cope with the current demand and this development will only compound the situation. The added traffic will add to the current congestion and add extra pollution to the air.
	This will create an even bigger strain to ickenham, the existing residents, schools, doctors surgeries etc. I understand housing is in need of but this is just ridiculous! two people per dwelling would be 1000 extra residents on an already strained ickenham I object to this ridiculous planning request

228	Although housing is important the current local infrastructure can not cope with the mass density of developments like this. Even with recent secondary school (vyners) expansion there are still many Ickenham kids unable to get a place here. This would make it even harder. Hillingdon hospital is on the brink of collapse and traffic due to HS2 is at breaking point.
229	Duplicate
227	Area is too congested. Long Lane traffic is at a standstill from early afternoon until late evening. Not enough doctors or schools in the area to cope with more people using these services. More congestion on A40, Hillingdon Circus, Ickenham. Units to be 11 storeys high will look awful on the landscape. People pay a premium to live in North Hillingdon & Ickenham and I believe a housing estate of this size will bring down the area.
	There will be insufficient parking for 514 units. The local healthcare is already at full capacity and the local road network will be unable to cope with the associated increase in traffic.
	The tallest block is excessively high, dominating the landscape horribly. All the blocks are too high: six floors would be acceptable but still much higher than anything in the area.
223	The area is already over populated traffic will get even worse
224	Duplicate
245	As a local resident I am most concerned about the extra vehicular traffic and grid lock that will occur at the "Master Brewer " crossroad junction which is adjacent to the proposed site. I also have severe flight safety concerns about a high rise building being erected so close to the busy MOD/Commercial airport at RAF Northolt and their associated Air Traffic Control Zone.
	I am simply baffled how anyone can think that building 11 storey buildings in this location can be acceptable to anyone in the local community where the highest building in currently no more than 3. This development would be totally out of character and is simply another attempt to maximise financial returns with no consideration to either the existing population or those who will end up living in these buildings. The current traffic congestion is already horrendous around Long Lane and Freezeland Way with the area being gridlocked for hours each day, and it continues to get worse. How does adding significant extra residential units right at the centre of this help in any way. Likewise, the tubes at rush hour are also already packed so how is this 'carless' population meant to travel, you can't commute into central London on bike or out to the home counties. The proposed car parking provision is simply a joke, most local housing has at least 2 cars per household, simply go look at all the housing on the local estates and show me any houses with no cars. How can you say 221 one bed units will have no parking provision when in reality they will look to park their cars anywhere they will be able to find a space in any side roads they can find which will be impossible as practically every house has already converted their front drive into a parking lot as they can't find parking on the road. Finally, what local amenities are these new residents meant to use, I already have to wait 2 weeks to get a GP appointment in my local surgery and it's a big struggle to get kids into school, how will this be addressed. Please reject this proposal and bring it down to a reasonable size so it fits in with the existing look and feel of the neighbourhood and the local community stands a chance of coping with all the new residents. Thank you
	I object to this development application as I feel it will have a detrimental effect on the residential amenities of neighbours and myself. There is only one bus (U2) that takes you from Uxbridge to the area. I have found at peak times on a weekday (morning, after school and evening) it's difficult to get onto a bus and have to walk home. This will be even more difficult with the addition of new residents. Furthermore, trains from Hillingdon station to the City will be even harder to get on to in the morning. My local surgery on Freezeland Way already struggles with the number of patients we have already. I find I have to have



	<p>short telephone conversations when possible or I have to wait two weeks to see a doctor face to face. This will become even more difficult as the new residents of 514 units sign up. I feel primary schools, nurseries and children's centres in the local vicinity will also be affected. It'll be more competitive to get our children into local schools, classroom numbers again will increase and our choices will unfairly be more limited. I feel our local shops on Long Lane will not be able to cope with the number of residents. We have a small local Co-op and one or two shops for each amenity, such as a hairdressers, small takeaways, an optician, a few minor pharmacies and dry cleaners. Finally, Long Lane and Granville Road traffic is already so busy during peak times, heading towards the A40 and Ickenham. The units will be right in the middle of these roads, so driving from my house anywhere will be impossible.</p>
	<p>My key concerns about this site are:</p> <p>a) Air quality and traffic congestion at peak hours. There has been residential property built behind the parade of shops at Hillingdon circus. More residential accommodation and commercial units will increase air pollution and congestion.</p> <p>b) Noise pollution. Noise pollution caused by unloading and loading of delivery to commercial units would disturb local residents and homeowners. It would have been useful to have a summary document for the entire planning application as it is unclear how many properties are affordable.</p> <p>c) Inadequate car parking space during peak periods, forcing traffic to local roads such as my road - Granville Road. "514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores".</p> <p>d) Additionally, there is the impact on local schools, doctors surgeries and hospitals due to the additional housing on the site.</p> <p>e) 11-storey accommodation would result in buildings at the site towering over and above other local buildings which does not blend in well with the local area and may lead to privacy issues as 11-storey occupants can see into private dwellings and gardens .</p> <p>The application is only focused on the 'present moment' rather than growth of the population and future air quality, congestion and noise considerations.</p> <p>For example the new build properties along Long Lane and elsewhere, and future commercial developments.</p> <p>The above factors (a) to (e) would deteriorate with the development of the opposite site next to Hillingdon Station by another developer. Also, as mentioned above, there is additional development of residential accommodation along Long Lane.</p> <p>Furthermore, Hillingdon does not need any more commercial units. What Hillingdon does require is more quality schools and hospital buildings to cope with the ever increasing population of the area. Residential storey blocks should be placed in a less congested area of the borough - and not Hillingdon circus.</p>
	<p>Out of character of surrounding dwellings and area . Far too high no one to be 11 stories high. Insufficient parking for cars. No one wants to bring Children up in a block of flats will become rented accommodation as people will buy them as buy to let's and won't create a Community feel about it. Build nice 2 and 3 bedroom houses instead that would be nice for families. I would question if too high for RAF Northolt. Totally against</p>
	<p>As with previous applications to develop this site, this is a totally unrealistic proposal representing gross overdevelopment. It is well known that the location of this site on the A40 junction is hugely congested, particularly at peak times, and is a pollution hotspot. This borough is subject to unsustainable demands for development without any consideration for the necessary infrastructure to cope in terms of road capacity, services etc. A development comprising residential-led, mixed use buildings of between 2 and 11 storeys containing 514 units as well as commercial space is a totally unacceptable proposal</p>

	for a notorious traffic bottleneck at a major road junction, particularly at a time when the area is about to be affected significantly for many years with the impact of HS2 construction.
	I am against this planning application on the grounds of firstly height of proposal of 11 storeys overshadowing everything. Also flight path th RAF Northolt. Grid locked traffic already at certain times. Also doctors dentists and local schools are at full capacity without these proposals..This area is one of the most polluted in the borough and this would only add to it.
	The height of the building will not be in keeping with the local area. There are already long delays on the roads around the area and this will make the traffic worse. There is already a lack of services, i.e. doctors surgery and the additional residential units will make this worse.
249	This development will cause more traffic during the peak times in the morning 7-9:30am and late afternoon 3:30- 7pm which already exists.
	The local area cannot cope with the amount of traffic now with the current road infrastructure not to mention the local services such as Doctors, Hospitals and schools. Also a having an 11 storey block a stones throw from a Military Airfield is hardly safe and could pose a serious security risk.
	Again we have a large number of units and not enough parking. 514 units with 165 spaces is ludicrous. Plus the area gets grid locked each morning and evening now.
	<p>This proposal is larger than the previously declined development.</p> <p>The proposal is clearly over development.</p> <p>The proposal does not take into account any of the local concerns.</p> <p>The proposal is for in excess of potential occupants of 1600 (far greater than the last application) with only 165 (the last application had 255) parking spaces this is woefully inadequate.</p> <p>The proposal has inadequate outside space for the potential number of residents. The proposal for multiple high rise blocks will stand out like a 'blot on the landscape' as no similar developments exist in the vicinity.</p> <p>The proposed high rise buildings will provide a hazard to aircraft landing and departing from RAF Northolt. The junction of Long Lane and the A40 is always busy and any additional traffic movements will only make this worse.</p> <p>No additional facilities for Doctors Surgeries or Schools are proposed and as both facilities locally are over subscribed this will lead to even more traffic movements especially at peak times as children will have to attend schools out of the area.</p>
267	Addition of more traffic to an area which becomes constantly gridlocked at peak times. Schools and doctors already full - sustaining for this amount people as it stands is not achievable
	This area is already highly compact residential area with a lot of traffic. Of recent times there have been numerous flood warnings for the Yeading brook which runs along the boundary of this site and in to it. This development will put further strain on the brook during rain fall and increase risk of property damage from flooding. This therefore this development will have the knock effect of increasing risk of flood to houses, increasing the price of house insurance and the same time reducing the value of properties in the area
	This development would substantially increase the population (1000+) and car numbers (800+) in this area of Hillingdon. This would have a very adverse impact on oversubscribed schools and healthcare facilities and increase traffic density and parking problems. Unless housing density on the site is substantially reduced then the application should be rejected.
	It worries me that we don't have The Infrastructure to cope with the Ammount of new residents,you havec to wait ages now to see a Doctor, The Schools are bursting at The

	seems. Long Lane is over busy now without this large amount of additional cars . Why can't we have a lot of fewer residential housing with a hotel and a few retail outlets ? I'm sure Tim Martin of Wetherspoon's would jump at the chance to have a hotel there .
	<p>To whom it may concern, I have serious reservations and worries about the proposed planning. The local area is decimated by traffic congestion circa 6 hours daily. The tailbacks in the side roads all over and along long lane are disgraceful. This caused by the congestion spilling on and off the A40. This proposed plan and the monstrosity of the size would only destroy despite the highly debatable and farcical denial by the planning team.</p> <p>Furthermore, as a Doctor myself, I only know too well the constraints on the NHS. This size of development would decimate the local GP surgeries. Leading to a third world health economy and service for local residents. The scale of the monstrosity of the project would decimate the already horrendous traffic during and after construction, would impair highway safety and cause serious health implications to the local populace, the patient numbers would be unmanageable. I kindly urge you to reject this application - avoid the gentrification that the Mayor is trying his best to achieve and to allow Hillingdon to continue flourishing by not copying the planning methods of other failing boroughs in the capital.</p>
	<p>514 units over up to 11 storeys, will absolutely change the whole feeling of the area. It will create overwhelming demand on local doctors, schools and emergency services. 11 storeys is way too many, and such an influx of people will overwhelm the whole community. The height of the buildings will be too high. Traffic in the area is high already, especially at peak times, there are often queues until 8pm in the evening, affecting local roads, residents being stuck in traffic trying to get home. Morning traffic is also bad, motorists are always blowing their horns, jumping lanes, driving on the wrong side of the road, so extra traffic will not help. I cannot believe that only 3 lorries will be entering the site, maximum 18, there will be associated traffic of workers, heavy machinery, adding to the noise, and pollution in the area. The HGV's are not known for being very green, they park anywhere and every where. Currently HGV's park actually on the small roundabout near Hillingdon Circus, so that will not improve the traffic flow if they just park locally. I believe this site will cause disruption in the area for at least 4 years, and the site will be over</p>
	<p><b>AGAINST THE DEVELOPMENT FOR THE FOLLOWING REASONS:</b></p> <ol style="list-style-type: none"> <li>1) Excessive traffic in the area will only be made worse. Takes 1 hour to even get into Ickenham already. How will this development ease this issue? I see no proposals just excessive useless PDF documents "detailing the development", full of pictures and just irrelevant information to fill the developers pockets.</li> <li>2) Pollution - have you thought of the environmental impacts? All I can see is just a pledge for a green area.</li> <li>3) Effect on local services, which are already stretched. Where are the provisions for this?</li> <li>4) Impact on elderly people? Has this even be considered in light of the stretch on services.</li> <li>5) Ickenham was a village, its important to RETAIN its heritage.</li> <li>6) What are you doing simply money making, profiting and not thinking about the residents, all you are after is more money, provision of less services and RUINING the local area for all of the hard-working residents.</li> <li>7) Crime - this will increase the levels within the community allowing such a development.</li> <li>8) You are ALLOWING GREEDY Builders to charge extortionate costs for dingy flats for hard working people. Why not make a more exclusive development in line with the area such as small bungalows or chalets, villas, which will attract type of buyer.</li> <li>9) You are approving these and in my opinion do not even live in the area. In LIFE NOTHING IS ALWAYS a tick BOX. THIS MUST BE STOPPED.</li> </ol>
	<p>How much more disruption to our lives does the council think Hillingdon residents can take? We have enough of our borough being destroyed by HS2 and now you want to</p>

	<p>approve this on top of it? Or is this just the sweetener so that when the HS2 spur runs down to Heathrow we'll all be so downtrodden we won't object. Our roads cannot cope with the traffic as it is, it take me 40 minutes to get from Uxbridge to Ickenham in rush hour already and I am despairing. Every bit of stry land is being built on with little thought to the supporting infrastrucre - where are the plans for extra schools, GP's and hospitals. And why does every new planning proposal seemt o assume that new residents will not drive cars??? I object more vehemently</p>
	<p>Continuation: I note that residential blocks eleven storeys high are proposed for the site. Isn't this a rather ridiculous, and risky, thing to do right next to a military airfield? I appreciate that aircraft do not take off and land over the site, but the newly refurbished runway would be less than two hundred metres away from the development. This may sound like fiction, but in this day and age the arsenal available to terrorists is considerable and Northolt Aerodrome is the preferred arrival point for many visiting dignitaries, as well as our politicians and royal family. My research tells me that a ground to air missile, and its launcher, are so miniaturised these days that they could fit into a rucksack. An eleven storey high vantage point would, I am sure, be greatly appreciated by any determined terrorist. It is not the development of the site that I object to. I am not a NIMBY! I would be perfectly happy with a superstore, a shopping mall, a retail park, a cinema or health complex with a swimming pool, or anything that does not involve the provision of residential quarters. A school or hospital would be acceptable, so long as they were properly air conditioned. While these would still add to the traffic locally, the effect would not be so bad as it would be under the current proposals. Briefly summarised, my reasons for entreating you to reject this application are as follows: The negative impact on health from being so close to the A40. The unrealistic proposals for car parking. The impact of more vehicles on local roads, and especially at Hillingdon Circus. The unacceptable pressure that yet more residents in that particular area would place upon doctors' surgeries, school provision and hospitals. The folly of placing high building so close to a military airfield. For these reasons, I hope the Planning Sub-Committee will do as it has done on all the previous occasions, the right thing, and reject this application.</p>
	<p>I could refer to the letters I have written to you every 18 months/2 years since 2005 concerning the redevelopment of the former Master Brewer site but, instead, here we go again, from scratch. In its briefest form, my objection to the latest proposal is that this site is unfit for human habitation. However, when making a decision, I would be grateful if you would take all the following points into account. The particular stretch of the A40 that runs alongside this site has the worst air quality in the borough with the exception of Heathrow, despite what the developers' report might have to say. Because the A40 descends under Long Lane and Hillingdon Station and forms a pocket, there is a particularly heavy accumulation of carbon monoxide and other toxic gases there, which slowly rises and then spreads across the site in question. With ever more persons suffering from asthma and other respiratory diseases, exposing residents, possibly for twenty-four hours a day, to fumes that will slowly poison them is hardly ideal. The plans for car parking spaces are laughable. The proposed parking spaces are totally inadequate for the scale of development on the site. Of the one thousand (minimum) cars that future residents may have, where will the other 800+ park? On neighbouring roads, already unable to cope adequately with the parking requirements of current Hillingdon residents? There is nowhere else, when all other roads in the immediate area of the proposed development are double yellow lined. Anyone living nearby, as I do, will already be aware that the Hillingdon Circus junction is busy at the best of times, and regularly gridlocked in the morning and evening. Long Lane is, after all, one of only three arterial roads connecting the south of Hillingdon with the north, and the most central of those three. I frequently find myself unable to leave the Oak Farm Estate by car before 9.30 a.m. or after 3 p.m.</p>

	<p>because of the appalling traffic congestion on Long Lane. Adding more than a thousand cars into that equation is not a socially responsible thing to do. Just across the road from the proposed site is the Hillingdon Health Centre, and presumably that will be the most convenient surgery for all the proposed residents to register. I am a registered patient there, and already have to wait three weeks for an appointment to see a doctor unless it is an emergency. I do not particularly want to see that time rise to a month, which is what would happen if hundreds, maybe thousands, of new patients suddenly materialised. Presumably the theoretical residents who might in the future live on the site if this application is passed will have children. In the case of those who are not crippled by asthma and other respiratory disease, where exactly will they go to school? The application boasts of the proximity of schools, but says nothing about how full they are. Hillingdon has already expanded as many schools as it can, until most of them are at bursting point and now lacking in any meaningful outdoor facilities thanks to new build. So where will all these extra children go?</p>
	<p>IT is too big for this area, the infrastructure cannot take this kind of building size. The roads, tube and all surrounding infrastructure will be affected. It will cause extra traffic around Long Lane and this will be a total disaster.</p>
	<p>It is ridiculous to propose an 11-storey building on the line of the runway at Northolt. Because of the noise and atmospheric pollution from flights, road and rail traffic and increasing congestion, it is vital to use the site to plant as many trees as possible. Local roads, schools, medical services, etc. cannot cope with a vast increase in population. The traffic on Long Lane and the A40, as well as Freezeland Way is congested and delayed for much of every working day. The proposals do not provide enough space for parking which will inevitably be demanded by new residents, and the proximity of the Underground station will not affect this, so the incomers will clog up local residential roads, (as will the incomers to the 'Old Dairy' site. It was criminal to permit the Master Brewer Motel to be built on the site of the Golden Lion Public House, which was itself an example of the sort of trunk road development which led to the Planning Acts. This proposal should be condemned completely.</p>
269	<p>The new proposal is a worse proposal than the previous ones that have already been rejected by LBH. Following are the reasons why I oppose this application:</p> <ol style="list-style-type: none"> <li>1) Already Long Lane is a very congested road during the rush hours. Adding another 512 flats/ apartments will only make this worse since there is no road infrastructure development apart from a small change to the traffic light system.</li> <li>2) Having so many high rise buildings right next to the A40 will further add to the pollution, which will harm the new residents who will be occupying these new flats/apartments.</li> <li>3) Community facilities, like schools, GP's surgeries and local hospitals are at full capacity at present. Adding another 512 flats/ apartments will again make the pressure on these worse. Therefore 1st these should be improved before trying to get more residents into an area.</li> <li>3) Parking - With only 165 parking spaces provided in the new development and 512 flats/apartments being constructed the local residential roads are going to have major issues with parking in the evenings and weekends with the new residents who can't find a parking place within the new development parking on nearby residential roads</li> </ol>
350	<p>Ickenham Long Lane too much congestion on roads no new house or flats should be built Ickenham Ruislip May now be classed as a car park at certain times of day we need to keep Ickenham as a village not a car park</p>
	<p>I consider this application to represent an overdevelopment of the site, particularly in terms of the number of units proposed and the height of between 2 and 11 storeys - as I believe the maximum storeys should be 3 or 4 high. The former application (i.e. Planning application 4266/APP/2017/3183 - refusal notice 21 March 2019) was refused as an</p>

	<p>overdevelopment by virtue of overall scale, bulk of development, height and density, and that was for 437 residential units between 4 and 9 storeys high. The current application is for even more units (514 units) between 2 and 11 storeys high, so I cannot see how the application can possibly be approved and cannot understand why the new application wasn't for less units and fewer storeys. My other major concern is the amount of extra traffic this development will generate, given that the traffic in this location, during rush hour is already heavily congested and often at almost a standstill. A much smaller development (lower number of units, at a lower height) would be far more acceptable to residents, and would be more desirable.</p>
	<p>Absolutely awful for the people in this area traffic is bad enough the town simply isn't big enough</p>
	<p>I would like to strongly object to the planning application. I am the lead GP for Hillingdon Health Centre which is across the road from this site. There has been no discussion with myself for provision of extra patients should the proposed planning be approved. Indeed 514 units with approx. 1000 new residents and patients will cause great disruption to my Practice. My surgery building will not be able to cope and there is a shortage of doctors and nurses currently. Extra traffic will cause chaos locally and the proposed 11 storey units are close to Northolt Airport. I would respectfully request that this planning application not be approved until there is significant reduction in the number of units and hence traffic.</p>
	<p>This construction is massive. It will tower over all the local area 11 storeys is much too high. All the area a maximum of 3/4 stories at most. The increase in traffic from these properties will totally gridlock the area, adding pressure to a road system that struggles to cope even during the time between rush hours</p>
	<p>Long lane traffic is already a nightmare. Up to 30 minutes to reach the A40 in busy periods. Less than 1 mile! Where are all the new home owners going to park? This is a terrible idea.</p>
	<p>Already too much pressure on schools hospitals doctors traffic in local area for this will be 1000+ more residents when you already have to wait 6-8 weeks for doctors appointment seems ridiculous.</p>
	<p>I strongly oppose this development as we only really have too many developments in Hillingdon and don't need any more. Also, it took a long time to make this a safe road area - we don't want this to change!</p>
340	<p>The area proposed for development would be the perfect place to resite Hillingdon Hospital. It is well served by bus routes and Tube station. The current Hillingdon Hospital is situated on a very narrow road (Pield Heath Road) that causes traffic to back up as far as the top of Lees Road. Resiting the hospital would free up the site for residential housing, reducing the locality of traffic congestion.</p>
	<p>The bottom of Long Lane is a source of constant road congestion, adding more houses and associated traffic will make this worse. Secondly we have a severe shortage of schools, dentists, GP's and hospital waiting lists, so adding more housing will add to these problems being experienced today. St Andrews Park is another large residential area that has created more pressures, this will make matters worse</p>
	<p>The traffic in our borough is absolutely terrible, more and more housing OBVIOUSLY increases traffic....Wildlife habitats will be destroyed and local services are already overstretched...Ridiculous idea to continue building monstrosities all over the borough.</p>
	<p>Hillingdon is frequently at a standstill with traffic backing up all the way to the top of Long Lane without you adding all these homes and the subsequent cars on the road which they will generate. You are constantly granting planning permission to knock down 1 house and build 5 houses on the site, our roads cannot cope with the increase. I live off of long lane and it is frequently gridlocked. I have to get to my parents house in Ruislip frequently and it can sometimes take me 45 minutes to get there. You cannot keep adding and adding people to this area that cannot cope. It's ridiculous</p>

	I live just off Long Lane and the traffic there is murder morning and evening - it takes me 20 mins to come off the slip road of A40 to get to long lane - the traffic is grid locked every day including Saturdays so the idea of more flats being built which includes MORE cars is ludicrous - the people in the planning department need to live in this area to know how bad the traffic is and to create more flats for more cars is unthinkable
	Infrastructure not in place to support increased traffic during and after build completed.
	Roads already congested, Long Lane & when coming off of A40 from Uxb direction, can take 30 mins on average to get off of slip road & into Long Lane in rush hour. Schools already oversubscribed and gave a 2 week wait for a GP appt....where will the families go for schools and GP's? No other "high rise buildings in the area, wgat an eyesore this will be. The thoughts previously that the residents on proposed site will not have cars & will use Hillingdon Stn is ludicrous, adding to the traffic congestion, also very limited parking on the actual site, this would make new residents park in adjacent roads already congested. It seems the proposers know nothing about the area and are just interested on making money from the site. I hope this plan does not get approval.
	I cannot see how our local amenities can support such a proposal. As it is we cannot arrange an appointment at our doctors surgery within 2 weeks. This is the surgery in Freezeland Way. A building 11 storeys high is just not in fitting with the area. I feel this plan to be ludicrous and I am totally against it.
	Whilst the site needs to be developed it must be in keeping with the surrounding area which this application does not comply furthermore the local infrastructure cannot support any further increase in the population so a new surgery school and much more parking facilities would need to be included in the development of the site. The roads in the area are already vastly oversubscribed and this size of site and with added cars and people would make it impossible for the present residents to function
	The road around longer lane are bad with traffic every day ! The 514 dwelling will add to the extra traffic plus parking will become more of a problem as there is not enough allocation of parking !!! You are relying on public transport but in reality most households have 2 cars . You have not considered the locals as usual !! Just in it for the money !!
	Total height should not be above current skyline. Traffic issues as Hillingdon Circus is a nightmare most weekdays. What about schools, doctors etc. I know you look at all these issues but it is a great concern. Long Lane Hillingdon side is extremely hard to travel off the estate due to traffic this increases when the rain comes down.
	Overcrowding. Local schools and services such as doctors, dentists etc are full to capacity. There is no room for increased population. Long Lane and A40 traffic is already horrendous increased residents will make it worse. Our roads are flooding in bad rain as green areas are being built on. I do not feel several more blocks of accommodation is justified for this area
	This proposal will cause more traffic to the area, more residents stretching our already busy local schools and hospitals.
	I do not wish to see high rises from my garden and also the area and local resources such as doctors, schools and roads are already congested.
	The local area is already over congested with flats/cars/ residents. The traffic is a nightmare and we also have HS2 to contend with. The local services/schools/hospitals are at breaking point now. I can't think of anything worse for the London Borough of Hillingdon.
	We do not have the capacity for more houses and therefore residents. The roads around this area are already busy all the time, our schools do not have space and the shops in the area are not geared up for it. Plus, no one wants to look at a building that is 11 storeys high.
	Increase in cars, people creating a further strain on schools, doctors, hospitals. Extra traffic



	and pollution on an area that is choked. Public transport in that area is poor, yes we have the train and a possible bus route down Long Lane, but the increase in traffic will increase pollution. With less parking spaces than proposed dwellings, where are vehicles going to be left? Schools are full, with new families moving in where do the children go? Doctors surgeries - we already see waiting times of weeks for an appointment, they cannot handle any more patients. Hospital - Hillingdon Hospital is full, it relies on old post war wards and would not cope with an influx of new patients. Building on the land is pure exploitation and greed with not concern for the local residents.
	The area is already heavily congested and this development will just make it worse. I park at Hillingdon station everyday and it is already a nightmare. Long Lane always has heavy traffic. St Andrews in Uxbridge is still in the process of being developed and this has already provided 1,000's of homes. Schools in the area are already bursting not to mention doctors surgeries and Hillingdon hospital too
	I am against the high rise element of this proposal, which is obviously designed to extract maximum profit for the developers. The large number of people who, as a consequence, will be squeezed into this already overcrowded part of Hillingdon will have a significant impact on local services such as schools and the health service, adversely impacting existing residents. Long traffic queues already build morning and afternoon in Hercies Road and Long Lane creating dangerous air pollution levels for residents. My part of Sweetcroft Lane has for years been plagued by queue jumpers driving selfishly and recklessly. The traffic situation will be made much worse by this development. Something a bit more modest please.
	Too much traffic o Long Lane as it is, almost impossible to go anywhere certain times of the day with all the schools off there now more people crammed in, and 11 storey structure just an eyesore, sort Long Lane out first
	This junction is already too busy and congested. NO WE DO NOT WANT THE PROPOSAL
	This plot should be used for the local residents, Ted o, sainsbury, shopping complex etc. the area is over crowded as it is. Traffic is stand still in mornings and evenings, this is another way for council to generate income through council tax. 500 units times £100 c-tax a month is 50k a month or 600k a year income for the council. How do residents benefit? More congestion/pollution/traffic, strain on schools, hospitals, why not build a school or a hospital, when did the council last invest in these amenities!!
	Long Lane cannot cope now with the amount of traffic that uses this road. This will only increase and make it one long car park. Local residents have not been considered
317	This is a hideous proposal . Our whole borough is becoming over populated . Too many cars , too many people the nearby St Andrews park and other dwellings built around uxbridge and Ickenham are enough- it's a huge tdevelopment we donot need any more people in our borough ! The schools can't cope the GP's we can't get appointments and the traffic will be even worse than it is around that site in Hillingdon
	534 units would have a massive impact on the local area, schools, travel, doctors would be affected. Not to mention 11 stories being a massive eyesore. By all means a downscaled version of this would be welcome, but this is over the top
	Without. surrounding infrastructure improvement namely raid improvements to Long Lane and junctions this will be a nightmare for local residents
	This development will have a huge negative effect on the surrounding area. How will the surrounding doctors surgeries / schools / roads cope with the number of residents that would fill these 514 homes. Already Hillingdon Circus is a nightmare during rush hour / school times - this developmment will just add to the congestion as people visit the retail units.
	I object - high rise buildings will not enhance the locality and this number of dwellings will add to traffic and pollution which is already too much.

	I object - high rise buildings will not enhance the locality and this number of dwellings will add to traffic and pollution which is already too much.
	The traffic between Hillingdon is already terrible. Long Lane has a major traffic problem at peak times, both north and south bound. Standing traffic already causes a lot of pollution, and this will only be exacerbated by any new developments. Our local services are already stretched, including schools, and again this will only get worse.
	Ickenham roads cannot take anymore traffic, there is not enough parking in the area. Please think off the residence in the area.
	The traffic in this area is already shocking so building untold amounts of flats is just ridiculous! You are adding to an area that is already overpopulated and this includes people and cars! Whatever time of day you go down Long Lane is terrible for congestion so you can't possibly think that anything built around there will alleviate this problem. How about thinking of residents who already live there to do something that will help with congestion as opposed to causing so many more problems!
	Believe buildings too high and most certainly too many units. Suggest 300 more realistic number of units for the site and location
	The traffic along long lane is already horrendous this will only make it worse unless some major road improvements are done. It already takes 30 minutes to get to the A40 from Crescent Parade at rush hour. Shocking that the council are even considering this application.
306	I feel there is so much traffic in Ickenham that building flats on this site will add to the traffic that we are dealing with everyday. I also feel there will be not enough space for residents to park which will add more disruption.
	This is a poorly thought through and unacceptable development which will have severe negative consequences on the area and the environment, particularly when taken in conjunction with the ongoing HS2 work. The site is simply not big enough to support the level of development and number of units, it will bring increased congestion to the area, which is already nearly at a standstill on Long Lane throughout the day. The increase in air pollution will be unacceptable and damaging to health, and there will be added pressure on social infrastructure including schools and health facilities which are already full. The scale and nature of the development is more fitting to an urban environment and does not respect the nature and character of the local area. It should be refused.
	I am against this proposed development due to the lack of sufficient infrastructure in the area to support another 1000 residents. We do not have sufficient health services or school places to support this proposed development. Further the current plan provides inadequate parking for the number of properties. The number of flats built in the area is not justified as this is an area of residential houses not rental flats which would make the area more transient and less secure. Further traffic in the area is bad enough with the building of HS2 let alone another 500-800 cars in the area. I do hope you see sense and oppose this application.
	Due the limited infrastructure currently available in Hillingdon and the current traffic issues in and around the Long Lane area, I think this application should be refused. This will add to traffic issue and the number of new residents coming into the area will also strain our current services available to residents (healthcare, education, police, transport etc).
	I understand the push for more housing. but that particular location is blighted with traffic congestion. adding more cars at that location will make the traffic jam that starts at the lights at ruislip all the way down long lane even worse. I also haven't been able to see my love to for 3 week due to demand for appointments...what provision is being made for I dressing healthcare capacity.
301	at peak traffic times it takes me over a hour to get from ickenham to hillingdon hospital where I work a journey which should take 15 mins . I have to drive as I see patients at

	home. adding so many homes will result in increase in traffic in a already congested area. I am also concerned about the health and school provision for so many new properties in that area. already there is a 2-3 week wait for a GP appointment what provision is there to increase capacity for those services.
	This area, especially Long Lane during school AM & PM drop offs & collections is already a nightmare to travel along, so increasing the number of homes in the direct vicinity is only going to make this far, far worse. If this does go ahead, I am sure that there will also then be queues from either side of the A40 to get to this burgeoning area.
	I would like to comment on the proposed plans for the new development at Master Brewer. To put it mildly, I am shocked at developers lack of consideration for human's life. I strongly believe the people living in the proposed flats would be extremely overcrowded, lacking space and putting their health at risk living on the very busy A40 road! There seems to be lack of parking spaces and amenities for them too. In addition to the above, the effect of the new development on existing community would be very negative. Having sky scrapers would look out of character for Hillingdon. Traffic along Long Lane is already at standstill most days during rush hour, adding extra 500 families is insane. What are the provisions for already oversubscribed schools, hospitals and lack of policing? Building a whole new estate in a very congested and compact space seems very irrational. We are living in the age where we MUST consider the impact this will have on local environment and climate change. The largest single threat to the ecology and biodiversity of the planet in the decades to come will be global climate disruption due to the buildup of humangenerated greenhouse gases in the atmosphere. Overpopulation is a real threat to Hillingdon communities. I really hope this development is not going to go ahead.
	Absolutely 100% against this Suggest maybe eye clinic or another department of hospital that is more badly needed
	Local roads in this area cannot cope with a development of this size. The Master Brewer junction is a dysfunctional mess in the morning and evening rush hours as it is and is in need of reworking to cope with existing traffic volumes and pedestrians crossing from the proposed site to the tube station.
	Development out of keeping, out of character because of it's height. The intended heights of several blocks will create an urban development in an otherwise green and pleasant landscape with "regular" height residential housing. This initial approach into Hillingdon borough is green for a reason, and marks the start of semicountryside. WOUld be entirely wrong and completely change landscape and character.
	Shoe boxes rammed into a small space. Long Lane is already heavily congested and. No additional school, GP or any kind of additional social or community based facilities. How is Hillingdon Hospital, which is already buckling under the pressure of dealing with the needs of its existing residents supposed to cope with the additional strain. So many reasons for a resounding NO to this development
	Iam against these proposals
	This proposal is far to big for the area. There is insufficient parking (people will still use vehicles no matter how close to public transport it is) It is far too high for the location and is too close to the major roads Air pollution for those residents will be very poor and the local schools and doctors surgeries will not be able to cope
	Will be absolute chaos on the roads in the area Also will make Hillingdon circus look ugly There are not enough schools or doctors to accommodate people that will be living in the 514 units Hillingdon Hospital also will not be able to cope Leave it as a green area for walks and children to play
	I am totally apposed to the building of 4 or more ten storey tower blocks in an area where nearly all the surrounding building are only two or three storeys, these would look totally out of sinc with the surroundings and with potentially two cars per dwelling that is 1000

	more cars in an already high congestion area and already over stretched local amenities. This is not an inner city residential area, this is a suburb on the fringe of the greenbelt which needs protecting and any new development should and must reflect the existing area
	Long lane traffic is awful and will be made worse by this development. Local schools aren't big enough for extra people. Hillingdon hospital can't cope as it is without extra people in the area.
	If housing should be mix of houses and flats.. the local services cannot cope. I.e schools and roads.
	This area is very traffic congested st present. There is not enough allowance for parking. Too congested a plan.
	I am concerned about the size of this proposal -514 units plus commercial units. My objection is specifically about the strain this will put on existing key services such as school placements, GP appointment availability, road usage and pollution levels. This site is located on a major junction and any resident on Long Lane can attest to the horrendous traffic on a daily basis, I cannot support any additional site which will adversely affect existing residents' quality of life.
	As a local resident I wish to register my strong objection to the proposed development. The development is totally out of character due to its mass, scale and bulk. The proposed scheme goes up to 11 stories high. There is nothing in the local vicinity beyond three stories high. Furthermore, Long lane suffers from significant traffic congestion and this development will only perpetuate the problem. There just isn't the infrastructure in place to cope with the concentration or development being proposed. Whilst the site clearly requires some form of redevelopment the proposed scheme is unacceptable for a number of Reasons but primarily the ones I have mentioned.
	Long Lane & the surrounding roads cannot cope with the amount of traffic it currently has. Until the infrastructure is increased it is ludicrous that more housing, therefore more cars and people are introduced.
	Take me a good 40 mins getting to my home from Uxbridge Road. Traffic is already very bad on any given work day. I invite you to join me for a walk around Long Lane. 100% against such residential build on this site.
283	The height of the units is too high. 11 storeys at that part of the borough will be an eyesore. Traffic congestion is a daily problem. The area of Long Lane and Hillingdon Circus and access roads from the A40 are gridlocked most of the time. Traffic noise and pollution are attendant problems. Traffic volume should be measured and air quality similarly should be accurately measured here. Furthermore, there are not sufficient car parking spaces in the proposed plan. There is a need for residential or social housing in the borough but in areas away from high volume of traffic. The former Master Brewer site would be better served by a community hall or hub so that young and older members of the community can use it. A tree planting venture would be ideal too. What kind of biodiversity is planned? The planning application is very vague on this matter. The project is too large in an area which is overdeveloped. The former Master Brewer site with its hotel began to experience severe traffic chaos because of the access points leading from the A40. I am against the planning application because it is not sensitive to traffic problems, noise levels and would just exacerbate pollution levels which are dangerous to humans and wildlife.
	The area is already congested with traffic and this will surely add to longer delays. Housing may be an idea bit along the lines of St Andrew's Park in Uxbridge as opposed to several storey high buildings that will not only ruin the look of Hillingdon and the over crowding of people within the area. This proposal is pushing residing residents away who currently like living here and a lot of residents are unhappy about this proposal.

	The area does need developing but this is not in keeping with the area .We need less flats and more houses.The flats are far to high and not enough parking spaces
	Traffics is horrendous as it is at the moment Flats are to high. Who they going to put in those flats? Wrong type of people Build a high school ( not enough)
	How the council will resolve the present traffic problem. In the morning to reach the long lane from my home its a night mare and also in the evening,the Long lane is always full of traffic. Now Granville road become night mare with the traffic. Is there any plans to make long lane as a dual carriage way to resolve the present traffic problem. How The council or highways to resolve the traffic around the Hillingdon circus junction. Is the council or Highway engineer visited the junction or Granville road in peak times. First resolve the traffic problem then think about the new developments. These are high rise buildings, there is no high rise buildings in this area.it will create a darkness in the neighbourhood. how the trees are saved in the land. I am against this development it won't create any good atmosphere or any value to the locals or good neighbourhood to the locals. it creates more burden to the health services, schools and other public services. I am against this development.
	so once again we have to justify why we should not have to have 514 units being built on this site,up to 11 storeys high! commercial units which will have an impact on the local shops, could be left empty and end up being vandalised another 165 cars being housed on this site, the traffic is already horrendous in this area, and the planning for the right of way in and out of this site looks like an accident waiting to happen. it all looks very lovely on paper.....but no it doesn't its an awful design, the buildings are like Cell Block H, not in keeping with the local area. If we allow this to go ahead then this will give them a green light for the other site to be built on, which at their last consultation was not spoken about, but was on their web site, so lets not be fooled by this planning application. All very well having associated highways infrastructure, but what about the Hospital, Dentist, schools and doctors to name just a few things at the last visit to this exhibit at the Baptist Church we were spoken to as if we were stupid, trying to tell us that this borough has the lowest ratio of cars to properties.... utter rubbish. We have enough building in this area, especially with the "dairy" being built on, that's going to also have an impact, so please lets ditch this planning, we've said no for this long..... let it go back to nature and enhance this area not make it another building eyesore.
	We do not need any more people living in this area. It is cramped enough as it is without another 500+ people moving in. All the heath services are full without adding more to the area. The people who have lived here for years do not get the help they need whereas the new people will jump straight in with benefits. The roads will be even worse to drive and park down. Roads will be gridlocked and cause mayhem for current residents. The current residents should come first and receive the help they need. The homeless should be housed in safe places before more people are let into the country and handed these new houses/flats. Will they be vetted in case of criminal records probably not. They won't be able to get jobs are there are already none going in this area.
	The former Master Brewer buildings had reasonable bulk, which did not excesssively stick out. With 11 levels in some buildings, this new proposal is overdominant in the area. The photos showing theoretical views from various local points have all been produced with trees in full foliage. They are also mainly produced from considerable distance from the site. They are also without the building elevations shown, only horizontal extent. The appearance will be not be in keeping with the local street scenes. With vehicle parking spaces allowed at only 0.3 per dwelling, insteads of the more normal multiplier, plus the inclusion of quantities of business units, there will be yet further pressure on residential parking in adjacent streets. There is already excessive pressure on local school pupil numbers, medical practices etc which means this development will further lower the

	general amenity of the area. The Long Lane/Freezeland Way/A40 junction suffers from extreme traffic congestion and pollution. This will add to the problems. Having viewed previous development proposals for this site over a number of years, all of which were turned down, I consider this one as bad, if not worse than its predecessors.
	Far to few parking spaces for that size project. The height is not in keeping with the area. Access is going to cause severe traffic problems.
	For an area that already deals with a lot of traffic etc I think this will only add to that causing more stress and misery to the locals and those who have to travel through long lane for their onward journey. It just seems every little bit of land is being turned into flats now nobody is thinking about the residents already living in the area.
	This area is already too congested and pollution from more Traffic plus construction whilst already contending with HS2 will cripple the area altogether.
	The proposed development is too dense and will put excessive pressure on the local area. The suggested high-rise blocks are out of keeping with the local low-rise residential area of North Hillingdon. There are not enough parking spaces. This will result in antisocial parking on local roads especially in the evenings and weekends. This development will have a negative impact on the local community, especially with respect to traffic, doctors and dentist surgeries, schools etc. This development could end up as a slum of the future. This is suburban outer London, not crowded inner London. A development of half the size would be more appropriate.
	I strongly object to the proposed plan for the following reasons: - There are far too many properties proposed for the space available- i.e. the development is far too dense. - The proposed buildings at 8-11 storeys high are totally inappropriate and far too high for a residential area where the existing properties are 1-3 storeys high. This location is in a residential area not a city centre location. - There are insufficient residents' parking spaces on the plan. In this area of London people have and need cars. Not providing parking is not going to stop residents living in Hillingdon Gardens from having a car. They will find ways of parking nearby. At present many local roads are resident only during the day but could be used in the evenings and at weekends causing tension in the neighbourhood and congestion on the roads. It is unrealistic to think people will do their shopping by bicycle, on foot, by bus or tube. - There is insufficient visitors' car parking for 514 residences. - The addition of 514 properties will put significant pressure on local GPs and schools which are already full. - The high density of the buildings may cause problems due to overcrowding and lead to increased levels of violence and civil unrest.
	High rise buildings of 11 storeys doesn't go with the surrounding areas. A largely populated area already causes enough traffic I dont see how building something to this scale is helping the area. It will cause more traffic, over crowding and is not needed in this area
	Once again this development does not fit in with the existing Character of the neighborhood. I am also concerned that local amenities will not cope with such an influx of people, schools, roads, doctors etc. Its all very well having less parking on site but this just pushes the problem to other areas of the bough. At the moment it take me more than a week to get a doctors appointment, this will only get worse.
	I totally object to the planning and building of five hundred and fourteen units over two to eleven stories high, this will completely change the outlook of the area, there are no buildings of this height within the surrounding area to even off set the look of the new buildings and is eleven stories even acceptable with RAF Northolt on the doorstep. The air pollution in the building area is one of the worst in London let alone the noise pollution which will no doubt increase due to the height of the buildings because it will have nowhere to go other than to rebound off the housing. A clever idea by Inland Homes to try to include the London Wildlife trust in the planning to make us think a few trees will make us be more amenable to the building of these properties but do they really think that a few

	<p>trees and paths will make a difference to the pollution problems when the pollution is already there even though the site has been left to overgrow with wildlife for the last few years, now I understand why they cleared the middle of the property before the reports were done. During the meetings that I have been to, Inland Homes has set great presidency on the fact that the London Wildlife Trust has been involved with the planning of this proposal encouraging the use of outdoor spaces within the plan but who would want to encourage their families and children to sit outside in the greenery with all that pollution, noise and traffic surrounding them. I also hear that there could be more units if the council lease the property in the front of Inland Homes property. I feel that the amenities in the area are already in overload such as Doctors, Dentist, Hospitals and Schools where the present population are having trouble getting on lists and into the local schools, so bring this amount of people into the area will not help at all and this is not considering the utilities which will be over used, or the fact that part, of Long Lane is so congested with traffic morning and evening that no one gets far fast and coming off the Oak Farm Estate is a nightmare, all these units and people will only add to the problem. Another thing is the car parking spaces so if we assume every owner would have a car even though the Mayor says they will not or even if we assume that only half have a car with only one hundred and sixty five car park spaces where do you think the rest of them will park, yes that would be right, in the surrounding area, where parking is already at a premium. I also feel that it is odd that the same agent is being used as the one used by Mayer Homes, also that one of the reports say there is no petrol tanks within five hundred metres of the site but there did use to be a petrol garage at Hillingdon Circus now owned by Suzuki I assume they did not take the tanks away from underground, at the property. Main reasons for objection are The height of the buildings which are not compatible with the surrounding area. The number of units. The increase in pollution and noise in the area. The increase of people using the limited amenities that we have in the area. The increase of people using the utilities. The increase of traffic to the area.</p>
	<p>Too many flats, too high, not enough parking spaces, too much pollution, vastly increase the local traffic which cannot cope at the present time, vast increase on public services eg doctors surgeries who cannot cope with present pressures. Residents of these proposed dwellings will NOT use cycles instead of cars, they will still use cars, the planners/developers are not living in a real world, this borough especially this area is overcrowded and flooded with traffic issues as it is. The Police, Fire and Ambulance services cannot get through the traffic as it is. An absolutely impossible scheme which needs to be thrown out as simply not viable.</p>
	<p>I am opposed to the current planning application on the below grounds. Traffic in the area is already a source of congestion. The Hillingdon circus junction is dangerous for pedestrians, both myself and my daughter have nearly been run over multiple occasions. Vehicles constantly jump the lights. The smell from car fumes is horrid and on some days you can taste it. The local schools have been expanded to three form entry and are already over subscribed, there will be the need for additional schools particularly secondary schools. Local hospitals are already unable to cope with the demands of the boroughs residents. There will inevitably be additional vehicles with the additional residents, although where they will park is also a concern. I was previously shocked when the previously planning application had 359 properties with 363 parking spaces as that was no where near sufficient, however the new application has 514 properties with 165 parking spaces which is ludicrous. Even along our small road some families have 2-3 cars and this is not even enough for one space per household. There is already problems in the area because there is nowhere for teenagers to go and be safe, so they wander streets getting up to no good and a recent fatal teenage stabbing just accross the road from this site is an example of this. I have a teenage daughter and won't let her out because it is not safe. So</p>



	<p>we are again looking at properties with no private gardens space, leaving yet more issues with communal areas, leading to anti social behaviour. There is no police presence due to lack of resources somehow is this "communal" green space going to be policed? These properties are even higher than previously proposed which will make the whole area feel so built up and an eye-saw. Originally the property developers told us they wouldn't build high and they had to be considerate of the RAF Northolt flightpath. The whole development of flats, why are there no houses? Why is it acceptable to squeeze so many properties into the space? It is all about money, not the environment and certainly no consideration for the current residents. This is not an investment to the area it will put a strain on the boroughs already stretched resources. There is already multiple large developments on the old American base in Ickenham and the old RAF Uxbridge site is a huge new housing development, I do not feel the borough needs more high rise flats. It needs family homes with gardens and adequate parking.</p>
	<p>This proposal is insulting to local residents, having just rejected a similar scheme that also bore no resemblance to the local area in any way. Making a few design tweaks and planting a few more trees doesn't change the fact the development is at least twice the size and height it should be. Local and London Plan guidance states that development should harmonise with the local area, and be of exemplar design if higher than normal density is proposed. This proposal fulfills neither of these requirements. Noise and pollution levels will exceed residential guidelines, and development to this size and scale will add hundreds of cars to the chronic congestion on Long Lane and residential road network that local residents already experience on a daily basis. Please reject this proposal.</p>
	<p>This scheme is poorly conceived and its design completely out of keeping with its local environment. The look, design and scale fail to harmonise with the local street scene, heights of the main blocks are four times the height of local housing, and the main tower at 11 storeys will be six storeys above the roof height of the station and Swallow public house opposite. Allowing a design like this to proceed would have a permanent and damaging effect on the local character of the area, which is characterised by low level terraced and semi-detached housing and shops. At present green belt views are visible and uninterrupted in most directions, from a position outside Hillingdon Station no buildings are currently visible or pertrude above the treeline. The height of the proposed buildings should therefore be no more than five storeys to reflect and respect the local environment. Proposing over 500 units on a site this small would place severe strain on the local road network which is already at a standstill during peak hours, increase congestion and pollution. The design is simply too big and dense, and should be rejected accordingly. I'm not aware of any local residents that are favour of development of this type having rejected a scheme of approximately 450 units earlier this year, for exactly the same reasons</p>
	<p>The proposed 11 storey and lesser buildings are totally out of character with the existing housing of the locality and would do nothing but blight the landscape and surrounding area! I attended the Public Consultation on 25th July in Hercies Road and the developers method of hiding the proposed impact of these eyesores was frankly unprofessional. They kept on trying to promote the way in which the development was going to enhance the nature aspect of the area which was a totally false impression. Also the parking proposal is totally unrealistic and unsustainable which will blight the surrounding neighbourhood. How can the developers possibly dictate to prospective purchasers whether or not the can own a car as they will have nowhere to park it!! This development proposal is worse than anything previously applied for on this site.</p>
	<p>The plans for 2 to 11 storey properties to be built on this site is not in keeping with the surrounding land and buildings of this area. The majority of local properties are no higher</p>

	<p>than 3-4 stories high so any higher will be extremely out of place and an aesthetic disaster. Also, only providing approximately a third of the parking required for the units being built is a total mistake and will cause more traffic and parking chaos in an already busy and polluted area. Please don't be naive in thinking people buying these properties will be care free families.</p>
	<p>I feel that buildings over five storeys are not in keeping with the area. The buildings along side Long Lane will probably dominate the local area including Hillingdon Station and Hillingdon Circus. A development of this size is likely to have an adverse effect on the local roads. Also, I doubt if there is enough car parking space for the number of dwellings as many households have more than one car and are likely to have visitors.</p>
	<p>We are objecting to this proposal as owner/occupiers of Ickenham Manor, a grade 1 listed building set in the green belt and conservation area whose land includes a scheduled ancient monument and is a designated site of special architectural importance. The proposed development will be visible from Ickenham Manor and we maintain that the impact on the view to the SW of the site will be severe. We have many other objections to the proposals but we rely on the Ickenham Residents Association to represent us on these other matters. On page 1 Appendix F of the Townscape Visual Impact Assessment Table the proposers acknowledge that the value of the site (Ickenham Manor) is Very High. They then claim that the susceptibility is Low because " The Site is in the background and not visible from this location (Ickenham Manor)". This is UNTRUE. The proposed development would be clearly visible from Ickenham Manor especially in the winter. The vegetation on the boundary between Ickenham Manor and the development is desiduous and moreover a large proportion of the trees on the boundary concerned are elm saplings whose life and height is very limited to the persistent Dutch Elm disease that infects them. Moreover the strip of land concerned is very narrow due to the proximity of the access road to the boundary, limiting the possibility of additional planting. The winter view from Ickenham Manor in the direction of the proposed development is illustrated a photograph to be sent by mail. We will add further proof of the impact by including a wireline of the proposed development superimposed. We note that the applicant has not produced a wireline superimposed photo from either Ickenham Manor or the viewpoint from the field adjacent. Therefore there is no objective evidence to support their claims about the visual impact of the development. We note that in refusing the previous application for this Site, 4266/APP/2107/3183, the LPA stated on p51 of the Officers' Report "The August 2017 application TVIA verified views confirms the impact of the proposed four to nine storey development. It will need to be reduced to circa 4 to 5 storeys to mitigate the impact on surrounding historic assets such as Ickenham Manor and also the green belt. The existing long underhinder views in this location will now be severely impacted and intruded upon. The November 2018 scheme does exceed the height, scale and massing of the August 2017 scheme." This new proposal is now two storeys higher than the November 2018 scheme, up to 11 storeys plus building services plant on the roof, therefore this reason for refusal must surely stand and indeed be reinforced. For these reasons we submit that the impact on the view from Ickenham Manor and the adjacent field will be High Adverse. Therefore the application does not comply with policy BE1 of the Local Plan and should be refused.</p>
	<p>This development is wholly in-appropriate for the area. There are no such high rise buildings locally and the infrastructure could not support the influx of vehicles. Locally there is already issues with doctors been able to offer enough appointments and dentists not offering NHS Care.</p>
	<p>Having looked at the planning proposal I have a number of objections to this plan: - The height of the buildings is not in keeping with the area and will devalue the house prices in the area. There should not be anything higher than 4/5 floors. - While I understand the company is trying to get the most out of the plot, living alongside a motorway is not</p>

	<p>beneficial for anyone. The people living there will be affected with noise and bad air quality and their mental health will deteriorate. While these buildings might be nice at the beginning, pollution and depressed people will quickly devalue the site and make it a hub for crime and bad behaviour. - Families will have nothing to offer in the area as nurseries and schools are already oversubscribed, as well as GP and Dental practices. There are no social places accessible in walking distance. I also do not see a playground for little children. - For single people and couples there is also nothing on offer. There is only one bar/restaurant close and while thinking people will take public transport to get to places, we cannot forget that this is zone 6 and not zone 1 or 2. - It would be more beneficial to have at least one convenience store and a coffee place included. - The lack of parking spaces will also be a problem as everything in the area is to be done by car, or by bus, but there are not enough frequent busses to accommodate this. I like the car club idea but 4 spaces in that case will be too little. - The traffic will also be impossible, unless the layout changes. At this point the traffic coming off the A40 going into Long Lane and coming from Long Lane towards A40 is already at its maximum, adding any more cars will totally gridlock the area. While I agree the site can be developed in a positive manner, this proposal exceeds the scale and density of anything that would make this a nice place to live and add to the Hillingdon area.</p>
	<p>The reason I am against this proposed development is that while probably meeting the minimum requirements for parking space provision, in reality this is by far never enough to meet demand. Even with 1 bedroom properties these are usually occupied by 2 adults who in this day and age will each have a car. The number a car parking spaces mentioned in the application seems to fall far short of even meeting a minimum of 1 space per residence if I understand the application, 514 residential units to only 165 associated car spaces.</p>
382	<p>Heights and scale are out of proportion with the area, our local health services and schools are already overstretched in this area. There is already poor air quality due to the amount of traffic. Hillingdon Circus junction is already congested at peak times, this will cause local residents further delays when travelling to work or schools.</p>
	<p>I would like to strongly oppose this development for the following reasons: -far too many units, will impact the area in terms of local facilities,traffic, sewage, added pollution -the height of the blocks is completely out of character with the area, suggests greed - it is naive to think the majority of these residents will not need cars. This isn't inner London, people rely on cars and easy access to routes. Where will these cars park and how much more gridlock will be added to this very overstretched junction. Cars tale back even past our house half way along Sweetcroft most days. - the density of this development seems way above guidelines - noise and air pollution will only increase Please ask for this to be scaled down in every way</p>
	<p>I can see no benefit to the local community in this development. Our area is already hugely over populated and how having some 1200 to 1500 people added to the mix can be seen to be beneficial, defeats me. Also the lack of parking spaces in the development would undoubtedly mean a severe "park anywhere you can" issue. The only person or people to benefit would undoubtedly be a fat cat or a possee of them. The overcrowding in the area (urban sprawl), leads to stress and a less enjoyable environment in which to live. I am already considering leaving the area.</p>
	<p>Not suitable for location - already have built st andrews in uxbridge - will bring build up of traffic - not enough services schools doctors hospital not enough social area for increase in population - concern add to crime in area</p>
	<p>It will affect our air quality, water surplus, increase noise pollution and traffic congestion.</p>
377	<p>Air pollution to bad there to build more houses.</p>
	<p>1. I am not confidant that the highway infrastructure for this propose development would be adequate,with the heavy traffic issues present on Long lane and the surrounding</p>

	locations. 2. More pressure on Doctors surgeries, schools and other services in the area. 3 Having 11 storeys high of buildings is not appropriate for North Hillingdon landscape. All so tall building get built, with in a short time more tall building could get built and even taller.
	The density of the dwellings is more than double the figure contained in the London & Local Plan. The extra population will put too much strain on local resources and amenities which will not be able to cope with. Local roads around the Hillingdon Circus are already gridlocked at peak time and extra dwellings would make the matters worse. Local pollution (air and noise) is already very bad and needs more greenery to act as buffer to noise & strong local wind around the tube station and provide fresher air. Quality of life & general health arising from living right beside the A40 would be detrimental to inhabitants of the new dwellings thus creating more strain on the already stretched NHS. to blend in with the local area, there should be no more than four floors to the building.
	- Heights and scale are completely out of proportion to the local environment - 514 units will add well over 1000 residents. Local health services and schools are already stretched - at peak and surrounding hours congestion is already unacceptably high. This proposal will probably add over a 100 cars to Hillingdon Circus junction at peak a.m. and p.m. hours when traffic is often at a standstill
	The proposed buildings are far too high meaning they will completely dominate the existing adjacent buildings. The density and style of the proposed buildings is completely out of character with the existing nearby buildings. Also, the additional traffic likely to be generated by such a large number of dwellings is going to aggravate an already serious congestion problem. In addition the number of parking spaces is likely to be inadequate - it is wishful thinking to assume that only 1 in 3 dwellings will own a car. Although a significant proportion of residents is likely to commute by train, given the developments easy access to the A/M40 and the M25 I think it likely that a lot of the residents will not be using public transport. Whilst the site clearly is ripe for development the current proposals are excessive and probably at least twice as dense as would be reasonable.
372	As a local resident, I am completely appalled with the size and scale of the application made for the Master brewer Site. 500 plus units with no provision for parking. This will introduce approximately 1000 residents into an extremely saturated area. Hillingdon Circus already has huge traffic problems. Struggles to get doctors appointments made worse. The applies to all the other services in the area. The height of the development is not in keeping with the area. And high rises come with their own potential in terms of fire and policing issues. Also if allowed this site will be close to encroaching on the green belt area. Our area is hugely in deficit of open spaces for recreation. In summary, please do not allow a development of this scale to go ahead.
371	Duplicate
370	This latest planning application, raises the following questions for us; With blocks up-to 11 storeys high, the development would be totally out of character and with the current controversy over high residential blocks, should they even be considered for residential development at this time? Are high rise buildings the most suitable development next to an airport? With the site being one of, if not the highest polluted site in the area, is it environmentally 'safe' as a residential development at all? Whilst no doubt the lack of parking spaces will be explained away by the encouragement of the use of public transport - in reality this does not happen, there are always more cars than parking spaces and more traffic congestion than allowed for - the area can not cope with any more traffic. With the development being on an 'island' the pedestrian access will rely on pedestrian crossings, which will in turn slow down an already very congested junction. The number of additional residents that this dense development will bring to this area will bring further pressures on already stretched local services of schools and doctors. Ultimately, this new planning

	<p>application is for a development even bigger than previously refused applications - surely that fact alone should mean this is rejected.</p>
	<p>I strongly oppose the plans for this housing development. I have recently moved into the area with my wife and the very reason for our decision to move here was for it's quiet and peaceful environment as well as the strong sense of community in the neighbourhood. I have seen the impact of housing developments like this to these qualities from past experiences and it has always been negative.</p>
	<p>LB Hillingdon is becoming too crowded with developments like the one proposed under this application. It is too dense and too close to the A40 Western Avenue, which will be a source of poor air quality for any people living there as well as constant noise. This cannot be good for the well-being of people living here. It will also be very close to the flight-path for Northolt and will, in years to come, add pressure to close the airfield down due to noise/air quality issues. The size of the development needs to be scaled back and a green buffer zone put in place between it and the A40. An alternative for this site would be as a retail/leisure facility (bowling/cinema) where noise air quality would not be such an issue as people only there for short periods/in air-conditioned buildings.</p>
	<p>The housing development is just too big for North Hillingdon. 514 units with 2-11 storeys will have a big impact detrimental to the quality of life of existing residents. Who wants a 11 storey high building destroying the present perfect landscape. 165 car parking spaces is not enough. If half of 514 units has a car, you need 210 parking spaces. Above all, the existing road systems esp the traffic junction intersecting Long Lane just about cope with heavy traffic in peak hours. I live on Granville Road and there is a perpetual traffic jam from 5.00-6.30 pm leading to Long Lane. Please note there is a new housing development at former Daily Express site. The extra traffic will compound to the misery of Granville Road and surrounding routes. I can understand the Master Brewery is such an attractive commercial site for housing with its proximity to M40 and Heathrow, the existing residents in North Hillingdon would not wish this project to disrupt a perfect neighbourhood.</p>
	<p>This proposal is totally out of keeping with the local housing area. To have such a large number of people living near the end of an active runway for large aircraft is madness.</p>
	<p>I am writing as a Resident, to register my strong objection to the current proposals for the development of the former Master Brewer site in North Hillingdon. My objections are because the current proposal and design are out of keeping with the local environment and fail to deliver buildings and spaces which are appropriately sited and of a scale, appearance and shape which correspond to local identity and character. I outline below my objections to the current proposals which are as follows: buildings will be disproportionate in scale to local housing and shops: more than four times the height of buildings in Hillingdon Circus, and surrounding residential areas 514 units will add well over 1000 residents. Local health services and schools are already stretched the proposed density exceeds guidelines for the area, and is over double the figure contained in the London and Local Plan; this is already a noise sensitive location with poor air quality at peak and surrounding hours congestion is already unacceptably high. This proposal could add over 100 cars to Hillingdon Circus junction at peak am and pm hours when traffic is often at a standstill Borough Local Implementation and Infrastructure Plans (LIP's) identify that the local road network is already at capacity, causing levels of congestion and environmental impacts to the wider surrounding residential areas Hillingdon Borough and TFL have targets to reduce congestion and improve air the quality levels at A437 Long Lane /A40 Freezeland Way</p>
	<p>The development of 11 storeys is by far too imposing for the location. The traffic congestion surrounding the proposed development is already significant and raises concerns about increased pollution and a further deterioration in air quality. In addition, residents are currently struggling significantly to access local services (e.g. doctors, local</p>

	<p>schools) without increasing the local population by the proposed numbers. Without tackling the infrastructure (medical care, education, roads) it is incredibly unfair to the locality to agree to this application. Finally, although the intention of providing limited parking for both future residents and visitors is noble, my concern is that in reality it will result in local roads being impacted</p>
411	<p>This will have a seriously detrimental effect on the local community for several reasons. Firstly, not having enough parking spaces available (only 165) for the 514 units is absolute lunacy. It's unthinkable that those potential residents will only use public transport - my address is a short walk to the tube, and every house has at least 2 cars whilst a substantial proportion have 3 or 4. Already there is limited parking available on our road even with residents permits. This is typical of many of the local roads located near the tube station. So parking is a serious issue. Furthermore, local amenities are already overstretched. It's at least a 2 week wait to see a GP, and my children attend fully subscribed primary and secondary schools in the area. The secondary school is already expanding to meet increasing demand and still will be full to capacity with the current local population. Additionally, the traffic in the local area is simply horrendous- it's always been busy on Long Lane but has increased exponentially in the last 5 years. Even if each unit has only 1 car per unit (a very modest assumption given the evidence of increased car ownership in the surrounding area) this will clearly add to the gridlock leading to a poor quality of life and a MORE polluted environment for our local residents. Walking my son to school everyday on Long Lane which always suffers from heavy traffic, I'm already concerned for the impact on our health. Last, but by no means least, having a tower block that high in the area will be a real eyesore for the local community, and will be totally incongruous with the surrounding landscape. If this were to happen, it could pave the way for further such buildings which would completely alter the face of our community to look like an ultra-urban, inner city landscape which it is not.</p>
	<p>I wish to object to the latest proposals for a new residential development at the former Master Brewer site adjacent to Freezeland Way. Below I have set out my main concerns with the latest proposals which have been put forward for the site. Traffic volume As with previous proposals, I am concerned that the excessive number of proposed residential units will have a severe impact on the amount of local traffic using the already strained road network. Every working day throughout the year all of the roads approaching Hillingdon Circus become heavily congested. The creation of the number of dwellings being proposed will only worsen this situation. The A40 / Long Lane junction is not designed to facilitate large volumes of traffic towards the former Master Brewer site and I am concerned that any modifications will compound the congestion already experienced by local residents in Long Lane, Hercies Road and Granville Road. Parking provision I am concerned about the number of parking spaces being proposed for the residents within this new development. On the planning application it would appear that only 0.3 of a parking space will be proposed per dwelling. Whilst Transport for London would promote the use of more sustainable methods of transport for such developments, Hillingdon is an outer London Borough with one of the highest car ownership per resident ratios inside Greater London. In practical terms car travel is the most convenient way to travel in this Borough and it should be expected that most tenants will have at least one vehicle per dwelling. The site itself in its current proposed form will not have nearly enough capacity to contain parking for all its residents. Inevitably this will create an overspill into the surrounding residential streets making parking for residents of neighbouring roads increasingly difficult in both the Oak Farm estate and the roads to the north of the A40. Secondary schools placements The construction of this new development will have a significant impact on the chances of existing residents in the north of the Oak Farm estate obtaining school placements for their children at nearby secondary schools such as Vyners</p>

	<p>and Douay Martyrs. As the development will be small distance closer, it is likely these residents will have a greater chance of their children obtaining a place at these secondary schools. Part of the reason I moved to this area was to provide a greater chance for my children being able to attend one of these two secondary schools. Site elevations Although these latest proposals seem to have placed the taller of the proposed residential blocks so they are abutting Long Lane and the A40, I am still concerned that the buildings will be visible to the rear of my property as my garden space is facing the direction of the proposed development. It will also have a significant visual impact for the vast majority of residents living in the North Hillingdon area and even some of the roads north of the A40 in Ickenham. Summary As with similar proposals submitted for the Master Brewer site in the past, I am concerned that the numbers of dwellings being proposed far exceeds the capacity of the local road infrastructure, the proposals do not provide enough parking space for tenants and the site elevations will spoil the view and privacy for a large number of residents in Hillingdon and Ickenham. It is for these reasons that I am vehemently opposed to this new development.</p>
	<p>This application should be rejected once and for all. It is totally out of keeping with anything in the area. It will affect locally the pressure on traffic, parking, schools, doctors, dentists etc. The new National Design Guide relating to the planning system sets out ten principles of good building arguing that a well designed plan should enhance the surroundings and fit a reasonable pattern of development. I hope that this application is rejected.</p>
	<p>I have concerns about the height of the 11 storey building. A maximum height of perhaps 4 storeys would be acceptable. The eleven storey building would be a very high structure and an ugly intrusion on the landscape in an area of currently low rise, 2 storey buildings. Will this tall building be a distraction for the increasing number of aircraft flying in and out of Nortolt airfield? Given the recent terrible fires in high-rise buildings, it is unlikely that currently the local fire brigade stations will have long enough ladders to reach the upper floors to aid in evacuating residents. Also, their water pumps may not have sufficient pressure to pump water high enough to reach the upper floors.</p>
	<p>I wish once again to express my dismay that this application is even being considered. It seems to have increased in size this time round. Parts of the development are even taller, which is totally out of keeping with existing dwellings in the area, then more units are proposed which will put even more pressure on Schools, Doctors, Dentists etc. Parking spaces 165 which is a joke in these days of usually 2 cars per family and even if the proposed development is near a station and bus route people will still want cars for shopping, holidays and all the many uses for which one needs a car - this will put even more pressure on the nearby roads which already have parking restrictions and cause problems for current residents. I understand that there is a new National Design Guide now that sets out ten principles of good building which argues that a well designed plan should enhance the surroundings amongst other things and surely it should be possible to provide attractive high density housing using innovative low rise design. There are of course many other reasons for denying this application and I hope that this application will be rejected.</p>
	<p>This is another unnecessary residential building project which will increase already ridiculous traffic and crowded roads. It is bad enough to try to get from Yiewsley/Stockley Park during the day and especially rush hours, this will cripple the area completely and even cause more pollution! Stop this!</p>
	<p>As owner of a house in Ickenham I recognise that we desperately need as much new housing as possible, preferably including social housing and mixed developments. This site is vacant and that is currently wasteful.</p>
	<p>I feel that we have been seriously misled by the developers, who were told by many</p>



	residents that the blocks were too high, and who assured us that the tallest would be 9 blocks. They also claimed that they would be sympathetic to the local character. The excessive number of 'units' and new residents will seriously over-stretch local health, water, school and transport amenities.
	There is insufficient open space for the density, high rise blooms need to be lower, there is good access to roads in the area so more parking spaces are needed with charging points also important.
	The traffic in long lane is already shocking. It has taken me 35 mins from Uxbridge rd end to Hillingdon circus. The pollution is terrible. The old Dairy and Crescent Builders is housing. We need hospitals schools doctors surgerys. NOT MORE HOUSING
	We object strongly to this totally unacceptable and inappropriate development for the following reasons:- 1)The bulk, scale, height and density are all completely out of character with the surrounding area and facilities. 2)It is an Inner London style, dense development in outer London. 3)It is a safety risk to the immediately adjacent Northolt Airfield. 4)The introduction of so many people on an Island development puts many of our already inadequate facilities, i.e schools, medical services and roads, at severe risk. 5)Alleging to be a social housing site with emphasis on pedestrian living, could not be more inappropriately located, as it already takes MANY minutes to navigate the adjacent pedestrian network of crossings. 6) The eventual occupants of these premises will be living in one of the worst known 'hot spots' for air pollution in the borough. 7)The effect on the street scene will be calamitous, representing a complete blot on the landscape. 8)Many views from significant areas of green belt land will be compromised. 9)It is a known fact that whilst there is very little provision for carparking, in an attempt to get the residents to use public transport - IT JUST DOES NOT WORK and we all know that they will park in adjacent roads. 10. All of the above goes to show that this proposal is in the wrong place, is too dense, is too high and totally out of character with the local housing and area generally. 11)On a positive note - we appreciate 'something' must be built here - but not this. Houses and a mix of Height restricted flats might well be acceptable. Previous applications both on this site and the Ruston Bucyrus site opposite, have all been previously rejected at much lower heights than the 11 and 8 storeys proposed here. 12) We ask you to positively reject this proposal in a manner such that any possible appeal would be difficult to succeed.
400	I am deeply concerned about this going ahead, already this area , especially long lane is suffering from congestion, it can take between 20-30 minutes to get from the top of long lane to the bottom, during the rush hour with the current parking restrictions around hillingdon station, we here are having to put up with commuters parking in our slip road and busing down to the station, with 2 developments in long lane , the builders yard at the top and the dairy site near the bottom, what further effect will this have locally, already we have hillingdon hospital in an overcrowded state. what effect will this development have on our local health centre in furseland way and other clinics etc. with 514 units and space for only 165 car spaces, this is going to be a disaster locally and an 11 story block next to an active runway ? do we want a small town dumped on our doorstep, no !!!
	This development is inappropriate for this site which should be developed to a lower density for many reasons.
	both the height of the buildings & the density of this planned development is totally inappropriate for this location. also the number of car parking spaces allocated are insufficient for the number of units & would cause extra congestion in surrounding roads.
	Far too many units for the site. Unrealistic number of car parking spaces. Area impossible at rush hour already. Pollution, overcrowding
	Are you completely mad, LBH? You certainly are NOT "putting residents first" if considering this appalling, misconceived application for approval. Standing right on the boundaries of the flight path to RAF Northolt and the gateway to an already heavily trafficked

	network, this development will undoubtedly be the cause of massive congestion at Hillingdon Circus and to its surrounds. Please deny this very unwelcome application...so much depends on it not being approved, LBH. Thank you.
	This proposal will not work in an area where there is already too much traffic. A better use of the land would be a public park and open space. Local GPs, dentists and schools are already at capacity and would be unable to cope with an additional 500+ families. Air quality is a concern.
	Proposed buildings will look totally out of place. There is no high level building in the area. The number of dwellings proposed is too high as the area will be unable to cope with the increased traffic linked with 500+ homes.
	Nobody I know wants building work of this size at this location. I am informed that IKEA had planning permission refused because it was in Heathrow's flight path. Have things changed?
	The look and feel of the proposed plans are not in line with the neighbourhood. Especially with so many buildings and with one at 11 stories. The traffic is already outrageous on Lone Lane. We should aim to minimise the traffic, not add to it. Also the schools and hospitals are already stretched. Not a good idea. Prefer a Tesco.
	The junction and traffic around Hillingdon Circus is already unmanageable during mornings (8-9:30am) and evenings (4:30-7:30). Travelling a distance of just over 1.5 miles to see family living near Oak Farm library can take me over 30 minutes during these periods which is really unacceptable. Building a further 500+ homes which make this situation much worse. Air quality is already not good in this area. This proposal would not benefit the local community.
	This is going to cause more traffic on Long Lane and damage air quality around this area.
428	This is a development that is not in keeping with the surrounding area, this is not an area of multi-storey buildings. Importantly, it would appear that the future residents will not be expected to own cars as there is little parking space provided. Are they not expected to be able to afford their own car, if so, they will not be able to afford the public transport services that they will be forced to rely on. Will they not have visitors, if so, where do their visitors park, probably in the surrounding roads. Traffic congestion in this area is already bad, this development will only make it worse plus do we know what the current pollution levels are currently in this area at peak traffic times? Also, the local schools are full, the local doctors are busy (I have to wait 2 weeks for an appointment so I know this is correct) so the necessary infrastructure to support such a high density development does not exist. It also takes several years to put in such services so meanwhile what happens for schooling, medical services etc? Finally, this will be the quickest and surest way of the Tories losing control of Hillingdon Council at the next council election if they allow this to go through. Remember, N. Hillingdon is your Tory stronghold.
	This will increase an already very busy and dangerous junction. We need less traffic and more leisure facilities.
	I am against the proposed development due to the huge size/height of the building which is out of scale in comparison to other properties next to/surrounding it and will look like a huge eyesore and be overbearing. The impact this building will bring is more traffic, noise pollution and environmental pollution. It will have a negative visual impact on the neighbourhood due to the buildings height and being oversized for the plot. It also raises a big concern for the safety of pedestrians with the increase of traffic.
	The traffic management on Long Lane in both directions is not fit for purpose / appealing as it stands. An increase in housing will increase the traffic on Long Lane which would be completely unacceptable for those living in the local area.
	Congestion, pollution, obstruction to life due to cramming especially in schools.
	I am against the proposed development due to the following - The proposed design

	development being out of character in appearance and size/height compared to existing properties and will look like an eyesore, due to it being huge in size and height in comparison to buildings in the immediate surrounding area. It will have a negative visual impact on the neighbourhood as the size of the development is over bearing and out of scale to the immediate buildings surrounding the plot. - The proposed building will look overbearing and out of scale to existing properties, due to the site being over developed with the building being oversized for the plot. The pressure on local amenities will therefore increase. -The huge size of the proposed development will mean noise, traffic and environmental pollution will increase in the vicinity and local area. -Highway safety is a concern as extra residential traffic will be generated entering and exiting the property.
	Extremely concerned about the impact on local traffic. The area is already extremely congested.
	I am against the planning of this development. Long Lane congestion is really bad at peak times this causes hours of delays as it is. There are lots of schools nearby with children walking to and from with the extra traffic it will affect them. Pollution, car accidents, danger to life. Why would you put local residents through this it will make peoples lifes horrendous. It will be a health and safety risk.
	I am against the planning of this development. Long Lane congestion is really bad at peak times this causes hours of delays as it is. There are lots of schools nearby with children walking to and from with the extra traffic it will affect them. Pollution, car accidents, danger to life. Why would you put local residents through this it will make peoples lifes horrendous. It will be a health and safety risk.
	Where will I start, roads congested already, schools, drs, hospital over crowded already. Your ruining our suburbs.
	Traffic, air pollution, hard enough to get drs and hospital appointment at the moment and school overcrowded. Plus the it would ruin the skyline with high rises
	This area is becoming to built up the traffic is already terrible especially on Long Lane the schools are over crowded
430	If you live in and around this area as I do you would understand that the area is not suitable for a construction this size. there is absolutely no infrastructure as in schools surgery both GP and Dentist as it is we cant get appointments and NHS dentist is a thing of the past.Long lane at the best of times is a nightmare with traffic every journey takes so much longer. Today i received a letter from parking management schemes Hillingdon for an informal consultation on proposed waiting restrictions from Freezeland way back to about a third of the Oak Farm Estate.What is going to happen if the Master Brewer Site get permission to build on your own letter 514 units and 165 parking spaces some body really needs to do the math. this is a nice area to live in please do not inflict us with buildings of 2-11 storeys and all problems associated with it
	I think this proposal is too large with too many units. It will not be in keeping with local area. There will not be enough parking with only 165 parking spaces for 540 units. There is congestion already on Long Lane and surrounding areas and this will just make this worse. There will not be enough doctors in the area for added families as lists in local GP's are already full and no school spaces for extra children also our hospital is a bursting point. This development will not take into account the nature and wildlife and protected trees which will be destroyed as a result of this very large and ugly development.
	Based on the increased traffic, and current congestion on Long Lane, the number of properties and assumed parking needs. Personnaly I believe the height of the structure does not fit the area, and the environmental (nature wildlife and trees) impact that this will also have.
	I believe the local infrastructure will not be able to cope with 514 additional dwellings. Long lane is a constant traffic jam at the moment, the local schools are full to bursting and

	it's difficult to get a gp and dentist appointment within 2 weeks at the moment. More people living in the vicinity without additional facilities will put more pressure on the local services and roads.
	Yet again the developers have tried to wring the most profit out of site that looks to be totally OVERDEVELOPED. This amount of dwellings will swamp all our local facilities. As for the car parking who imagines that only approx. 1/3 of residents will have use of a car which will in turn overrun an already congested car area. Why not be realistic and build accommodation on this site that reflects the size of plot and local available amenities.
450	Grave concerns on the demands this will place on the local infrastructure, including the exacerbation of the Long Lane traffic chaos. Not to mention the Urbanisation of North Hillingdon, which should be protected from mass colonisation.
	<p>Received a letter about a new planning application, went on line typed in the application number and nothing came up. So my complaint is as follows. The former Master Brewer Site. Currently the traffic situation outside this site is out of control with such high volumes of traffic, that to build new dwellings would just increase the pollution to unacceptable levels, and the impact on residents would be like a slow death sentence regarding our health. This site should be turned in to a nature reserve with trees to absorb the pollution, rather than add to it by building and having additional cars in the area. Counsellors should realise there their to represent the views of the residents and there welfare, and should be putting our interests and concerns first before business. This is coupled with the anticipated increase in flights in to and out of RAF Northolt, given the fact that £40 million pound runway upgrade has just taken place. So the increase in pollution is just going to get worse. And the counsel and counsellors have a duty of care to its residents when it comes to making these decisions, knowing that these factors increase pollution for its residents should be at the top of there list when making these decisions. As stated our health comes first, not business and jobs but health and wellbeing of its residents.</p> <p>Ask the residents if they want this site as a new residential area, conduct a poll ask every house holder within a 1 mile radius what they think. Its our borough and councillors are our representatives and should act on what the majority want to happen within its boundaries. The long term effect of pollution within the borough should be of the highest priority, when it comes to the health and wellbeing of its residents.</p>
	I strongly object to this proposal on grounds of its design and scale which completely fails to respect the character of the local area. There is nothing in the vicinity that approaches the size of this development, its density, or looks anything like the block design that is proposed. The height of the buildings ranging to 11 floors is unacceptable, dominating everything around them, local housing, amenity space, Hillingdon Circus and the approaches to it. Placing this many homes directly onto Long Lane and a road junction that is already at a constant standstill will simply increase the misery that local residents endure on a daily basis, generating even more traffic. This is not the type of development residents want, nor is it right for the site.
	I think that you have an important decision to make about changing the character of developments in the area. Once you've allowed 11 and 8 storey blocks, the next overdeveloped proposal will simply reference this site and the precedent it sets for massing in this area. I also believe that the mixed use provision seems a little bit of a token effort in this version of the proposal. To suggest that the gateway building has a sympathetic nod towards existing architecture because it has a chamfer, while at the same time indicating that it's height has been deliberately raised seems a little inconsistent. Too many of the site-wide design obligations have been addressed by two minor aspects of this one building for this to be considered in line with the previously stated ambitions for this area, in my opinion.
453	Far too many properties on such a small crowded space. The whole area is grid locked at

	<p>the best of times so adding 500+ dwellings in ludicrous and just money grabbing. A smaller community led plan would be far more appealing. Have the developers spoken to the IRA have they discussed road planning and schools and facilities. Hmmm... I know the answer to all those points. Too many properties and no engagement or planning just build/make money and run. This model doesnt work and shouldnt work now adays.</p>



21 November 2019

[REDACTED],  
Planning Case Officer,  
London Borough of Hillingdon,  
Civic Centre  
Uxbridge UB8 1UW

Dear [REDACTED]

**4266/APP/2019/3088 FORMER MASTER BREWER SITE FREEZELAND WAY**

*Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development*

**Summary**

The Oak Farm Residents Association (OFRA) wishes to object to the planning application above, primarily in respect of its excessive height, density and massing and the extra burden on local health and education services, but also to the detrimental impact this will have on our local environment and its semi-rural, suburban character.

In scale and style this proposal fails to harmonise with its environment and would dominate its surroundings to such an extent that it would detrimentally change the established character of the area. In our opinion, the proposal comprehensively fails to respect national, London and local planning policies which ensure that any development is in keeping with its locality. The proposed density is over twice the prescribed norms.

The key planning constraints of the site are well known:

- chronic congestion at peak and surrounding hours,
- severe noise levels that either breach WHO ambient guidelines for residential areas, or sit in the upper tolerance zones, even after mitigation measures have been applied. Noise levels regularly exceed 100db at the boundary and 90db at some parts of the site,
- existing poor air and particulate quality will be made even worse with a development of this density and scale.

All of these issues point to the need for a much smaller and more sustainable development which respects local character and the scale of its surroundings.

We are concerned that the current proposal ignores almost completely, the clear planning guidance given by Hillingdon Borough in its rejection of the similar, but smaller, MB Homes' proposal earlier this year, and significantly **scales up** the development in size and density, increasing the maximum height to 11 storeys. The only concessions have been minor architectural design features, with limited introduction of dormer style roofs, better architectural landscaping and biodiversity schemes at ground level.

The proposal is totally out of keeping with its locality and at the current scale, style and height is in no way responsive to local needs, or representative of the feedback from residents.

The Planning Case Officer should also note that the applicant has cleared trees and vegetation in the central section of the land, including a TPO marked area, despite the advice of initial ecological and biodiversity assessments which noted the site's potential habitat value and its proximity to SSSI's and which stated specifically that no work should be undertaken until more detailed assessments have been completed.

It is fair to say that the current submission has generated dismay and disbelief in the local community, with Inland Homes choosing to increase size of the development by more than 20% over its rejected predecessor. Stakeholder and community consultation has clearly been a tick box exercise, as OFRA residents argued strongly that the 9 storeys shown in the designs presented to us in the initial meetings were already too high. GLA comments are similarly detached from the realities of the site, and are selective in their interpretation of planning guidance, simply promoting a higher housing density. It should also be noted that Hillingdon has consistently exceeded its target for new homes and reached 160% of target in 2017/18.

While as an Association we welcome the proposed 35% affordable housing and the reduction to 0.3 parking spaces per unit, because the local road network simply cannot handle any additional traffic, our objections to the proposal are substantially the same as those against the Meyer Homes' plans in 2018. At the newly proposed scale, height and density the impact of this development would be detrimental to local quality of life, increase local congestion and be completely out of keeping with local expectations. These expectations were clearly voiced at Residents' Meetings and at Inland Homes' consultation / exhibition. Residents are dismayed that a few individuals' comments were reported selectively and out-of-context in the report submitted to the planning committee by *Terrapin Communications*. Although these personal views were positive, the general consensus of the Residents' Association is that these plans are too high and too dense.

### **Headline issues**

- The proposal provides a scheme that ignores London Plan Policy D1 B 1 which states that development design should **respond to the local context** by delivering buildings and spaces that are positioned and of a **scale, appearance and shape** that responds successfully to the **identity and character of the locality**, including existing and emerging street hierarchy, building types, forms and proportions. Comments by the GLA planning team suggest that it has again been selective in its interpretation of the London and Draft London Plan policies and commitments, in order to steer the developer in the direction of a higher density scheme which ignores local character, prevailing style and the planning constraints of the site.  
This is a noise sensitive, poor air quality location with appalling congestion at peak hours. A development of this density will negatively impact air quality and local infrastructure. To date the GLA has failed to appreciate the specifics of the site's surroundings or to consider the risks to public health of such a high-density development in this location.
- The design remains central-urban in nature and scale, dwarfing and dominating its immediate surroundings; building style and appearance do not harmonise with locally prevailing design and height, with only minor local architectural references included. The current design would substantially alter the character of the suburban locality and be detrimental to and dominate the local amenity.
- The height and density of the development has increased from the previous scheme. The previous Townscape assessment acknowledged that the scheme would have a **High Adverse Effect**, changing the existing roofline and scale of the streetscape at Long Lane, Freezeland Way and Hillingdon Circus. The assertion in the Bradley Murphy Design architects' assessment (2018) that this would be *prominent but in equilibrium* with prevailing



townscape characteristics was absurd. Given the increased height and scale of the new proposal, any assertion that the overall design harmonises with local environment is now even less credible, and was contradicted by the Montagu Evans assessment in 2017/18 for the same site. Scale-up was acknowledged by planning authorities to be **too high** even at the 7 storeys proposed previously.

- The updated Bird Hazard Assessment re-states that the height and predominately flat roof design will create a habitat attractive to species observed in the locality, and on completion risk changing the balance of current wildlife populations, weighted towards those species more hazardous to aircraft, therefore increasing the likelihood of Bird Strike. Given the site's position next to RAF Northolt and potential changes to mixed use air corridors, this is a major concern and **remains a risk** that has not been adequately considered.
- The Acoustic Noise Impact Assessment demonstrates that in its current form the development **fails to meet** maximum WHO and BS8233 standards for community noise, and the ratings applied were lower than they should be for a noise sensitive development that potentially achieves a **SOAEL rating**. We request that the Borough makes its own **independent assessment** to confirm the findings. Nearly all areas of the development continue to **exceed** the LAeq 8hr 30db noise limit for bedrooms at night, even after design mitigation and insulation has been applied. These constraints can only be addressed by a lower density, less intensive development.
- The **London Plan** states that noise sensitive development should be separated from major noise sources by distance and screening. As before, this proposal does not effectively provide this, with the accommodation facing Long Lone and beside the A40 and tube-line currently too close to the roads and major sources of noise to provide suitable conditions for habitation.
- **The Local Plan** states that London Borough of Hillingdon will seek to ensure that noise sensitive development will only be permitted if noise impacts can be adequately controlled. Currently this is not the case.
- **The Mayor's Ambient Noise Strategy** states that proposed development should have particular regard for the impact of aviation noise on noise sensitive development, **but aviation noise has not been included nor incorporated into measurements supplied to date**, the current assessment is therefore not fully evidenced to the standards dictated by GLA commitments and policy.

### **Detailed objection points**

- Given **the constraints of the site**, which are highlighted throughout the Borough's planning and local implementation guidance, the new scheme is unsuitable in **housing density and scale**, which both far exceed established norms in the surrounding areas. Its height and appearance are of central-urban design and would have significant and negative impact on the local amenity, which is characteristically suburban in nature.
- The increase in scale above the buildings in Hillingdon Circus and the surrounding area remains too great at over three times (four in places) the existing streetscape.
- Harmonisation is poor, with the overall design representing a complete departure from the prevailing style and landscape of its surroundings. The overriding visual impression is of a development conceived without due regard to its surroundings;
- Existing greenbelt views would be significantly compromised at points in Hillingdon East (from Granville Road, Freezeland Way, Hillingdon Circus) and the proposed scheme would be overbearing from Ickenham Manor and the Ickenham Marshes conservation area and its approaches;
- The dominant outline and scale of the design is exacerbated by its core flat-roof design in an area that is predominantly pitched. The low-rise nature of local buildings is the prevailing feature of the Ward as a whole. The current design makes only minor concessions to this local feature, and in a very small number of areas;

- Local buildings are almost exclusively two-to-three storeys and of suburban Metro style, interspersed with older village centres. Since its construction nearly a century ago, the design of the shopping parade at Hillingdon Circus has hardly changed. Views from Hillingdon station currently present an unbroken tree line in all directions. At an average height of eight floors the proposed development would irrevocably damage this setting and view. The report by Montagu Evans in 2018, prepared for the previous application by Meyer Homes, clearly states that without significant reduction in height and softening of the upper storeys' appearance, the scale of the buildings would negatively impact the local environment. This new proposal **exceeds** the height of its predecessor;
- **The site sits in a TfL and Borough air quality focus zone.** Planning approval at this scale and density would inevitably produce an increase in congestion and car movements, and would negatively affect air quality. The scheme is projected to add around 100 car and passenger journeys to Hillingdon Circus at peak hours, however given the overall size of 514 units **we consider this to be an underestimate** that doesn't adequately consider potential pick-up traffic or taxi use that will certainly be generated by a development of this size. We are also concerned that no consideration has been given to car-ownership above the 165 parking spaces.  
The Borough has well-stated commitments and targets in Local Transport, Environmental and Air Quality Plans to reduce congestion and improve air quality levels at A437 Long Lane /A40 Freezeland Way. Of the total NO<sub>2</sub> emissions for Hillingdon, over 51% is from ground-based transport. This is the highest percentage and per capita figure for all the London boroughs. Even a 0.3 parking ratio will significantly increase congestion, but the assessment fails to give due weight to the fact that traffic is often at a standstill and any traffic attempting to enter and exit the site would be entering directly into a pinch point, and have a higher knock-on effect. The Transport assessment assertion that there would be a negligible increase in car journeys fails to consider the impact that even a small increase will have at this junction.
- The **starting assertion** in planning terms, that the Master Brewer site represents an 'island' and should therefore (for so-far unsupported reasons) allow higher housing densities to be considered, **is false**. Existing projections and aspirations of both LBH and potential developers for additional development at **site B**, culminating in a fully developed and linked residential and mixed intersection, are well documented and therefore become material in the consideration of housing density. In fact, national planning guidelines promote this as a consideration for a lower density, spatially- spread development.
- **Architecturally** the proposal indicates large urban blocks and is completely unrepresentative of the prevailing style around it.  
At ground level the visual impact is reasonable, showing soft landscaping, and we welcome the reported involvement of the London Wildlife Trust, however the design fails to reflect the local, largely residential character; it has a flat roof design in an area that is predominantly pitch-roofed. As a basic large block design, it fails to meet the **key design brief** to provide a visual link or extension to Hillingdon Circus.
- Similarly, the proposed **landmark building** is around three times the height of the buildings opposite and would dominate the Hillingdon Circus junction. This level of scale-up is physically and visually overbearing;
- At eight, nine and eleven storeys, **the height** of the northern buildings, even considering the topography of the site, **is too high**. As stated, established development surrounding the site is mainly two storeys (three including accessible roof space) for at least a 1.5 miles in all directions, with the exception of one small building in Hercies Road, and the new Express Dairy development behind the shops in Long Lane. The current design would rise, on average, three storeys above the chimney height of the Swallow Public House opposite (current highest point in the area) increasing to 6 storeys above average for the proposed 11-storey building.
- **Assessment against the Mayors Healthy Street Indicators** (Transport Assessment sections 4.6 and 4.7) confirms vehicle dominance on surrounding approaches to the site,

with traffic frequently at a standstill, but it fails to give any evidence of how the development will address this or achieve improved uptake of sustainable travel as part of its mitigation response.

- Mitigation measures against the street noise of key routes are either missing or weak.
- Health services in the immediate area are already oversubscribed, particularly the **GP and dental surgeries**. Local services cannot support development at higher than currently-established densities. These services are already difficult to access at peak hours, because of congestion levels.

Local Primary schools have already been enlarged and are approaching full capacity.

Pedestrian access would require under-11s to negotiate **major roads and busy junctions**, with a 30-minute-plus walk. Residential roads around the schools already suffer from major congestion at school times.

### Air Quality and Noise Disturbance

- Air Quality and Noise pollution are two of the three major constraints present at the Master Brewer site (the third being the congestion of the immediate road network). National Planning and GLA guidance state quite clearly **that there should not be a presumption for development where these limits are routinely exceeded**. As air quality and noise pollution exceed legal limits, should the building go ahead, then scale, housing density and layout should be designed to effectively mitigate these risks.
- Internally, individual dwellings should be of a size that mitigates these risks, separating noise sensitive areas from major noise sources. Screening, distance and internal layout should be employed *in preference* to relying on sound insulation (London Plan Policy 7.15). The proposal's density and scale fail to meet these requirements and the Ambient Noise Policy guidelines.
- The proposed layout with a solid outer wall of buildings, would act as a partial barrier to the A40 and tube line noise levels, but the high density and the number of units proposed would increase individual exposure. Exposure at the sixth, seventh and eighth floors at the perimeter will be higher because of continuous and greater all-round exposure.
- **The Noise and Acoustic** assessment supplied by the applicant demonstrates that the proposal **currently breaches** acceptable limits for residential accommodation during both day and night; the maximum limit is 55db (day) and an ambient 45db at night. FOI figures from 2017 recorded measurements of **83db, 78db and 90db** during the day and **78-74db / 88-84db ranges** at night at the site boundary. Measurements quoted for previous applications by Meyer Homes' consultants recorded inner amenity areas at **55-60db** which exceeds the upper WHO limit for residential developments. Perimeter measurements taken this year using a Smart Phone app recorded **90db** with a consistent exceedance rate of **70db**. On these grounds alone, housing density, height and upper floor design need to be revised and scaled back to cope with noise disturbance. Currently, few areas meet acceptable standards:
  - Building 1 - only the rear (east) will meet the BS8233 guideline levels;
  - Buildings 2, 3 and 4 - only the courtyard within the buildings will meet the BS8233 guidelines;
  - Buildings 5 and 6 - the podium area between the buildings will **exceed** the BS8233 guidelines;
  - Buildings 6 and 7 - the podium area will only partially meet BS8233 guidelines;
  - Buildings 7 and 8 - the podium area behind will only partially meet BS8233 guidelines;
  - Buildings 8 and 9 - the podium area between will **exceed** the BS8233 guidelines;
  - Building 10 - only the west side will meet the BS8233 guideline levels;
  - Building 11 - the south and west side of building will **exceed** the BS8233 guidelines;
  - Building 12 will **exceed** BS8233 guidelines, only the south side will comply;
  - The central area will not meet the BS8233 guidelines, with the exception of a small area;
- **DEFRA noise mapping** (noisemapping.defra.gov.uk) confirms the above, and shows that noise levels from roads and land immediately adjacent to the A40 are high, regularly in excess of 75db, and frequently exceeding 100db.
- **Section 4.1.3** of the Noise assessment **appears to be flawed and should be re-examined**. It states that policy guidance given in the Planning Practice Guidance (PPG) for

assessing impact of noise on patterns of behaviour, quality of life, and the character of the area **should not be applied (and therefore hasn't been)**. On the basis that the site is currently empty, residents would be moving into an existing situation, and behaviour is therefore already set in terms of impact and effect. Therefore the consultant ignored any impact or behavioural change the proposed development itself may have. This is an obtuse interpretation of planning guidance. **Fully applying the criteria** would most probably result in the site being categorised at the **Significant Observed Adverse Effect Level (SOAEL)**, which requires additional planning considerations be taken into account. At this level, amenity space can be considered unusable, and is the level above which significant adverse effects on health and quality of life can occur.

- The Noise assessment asserts that noise level breaches are acceptable because residents have access to quieter green spaces within a “5min walk” of the site – namely Elephant Park. As we highlighted to the LBH planning department earlier this year, this is **misleading** because this park suffers similar noise conditions, and access requires negotiation of busy junctions.

### Local Transport Network

- The Mayor’s Climate Change Mitigation and Energy Strategy sets out the Mayor’s vision of London in 2025 as ‘the greenest big city in the world, with a thriving low carbon economy’, and, focusing specifically on transport, ‘London’s transport network will be well on the road to zero emissions’, also reflected within the MTS13. With this in mind, Hillingdon has completed its own Climate Change Strategy, and its Sustainable Community Strategy prioritises ‘Protecting and enhancing the environment’ as one of its six broader goals. This includes the objective to ‘mitigate and adapt to climate change, **reducing emissions across the borough**’. This objective is also a feature of the West London Sub-Regional Transport Plan, and has been retained in the LIP. Of the total emissions for Hillingdon, 51% is from ground-based transport – 6.2 tonnes per capita. This is the highest percentage and per capita figure for all London boroughs. AM and PM peak delays show that Hillingdon has the 7th highest AM peak delay of all London boroughs and the 10th highest PM peak delay. Of the 30 identified hotspots, **nine locations** are considered high priority (as a result of LBH and TfL assessment) and are to be considered as part of the plan to reduce congestion and smooth traffic flow. Eight of the nine locations are on highway routes maintained by Hillingdon, including **the A437 Long Lane/A40 Freezeland Way junction** – the site location. **Congestion is now so heavy in the immediate and surrounding area** that a reasonable argument, on public health and quality of life grounds, is that any sizeable development should be postponed until TfL has taken action to reduce it.
- The proposal suggests that “*associated highways infrastructure*” would be redesigned, but no details have been given.

### Conservation and Heritage assets

- The Ecological and Biodiversity survey states that **MAGIC records a Priority Habitat within the site boundary**, supporting nesting birds, and potentially bats, reptiles, invertebrates and hedgehogs. The site also lies within the Impact Risk Zone for two SSSI’s (Frays Farm Meadows and Denham Lock Wood). To date, there has been no further elaboration of these implications, by either the Borough Planning Department or the applicant. The status and scheduling of the required surveys is unclear; these surveys can only be undertaken between March and September (for bat scoping May-September) before final approval is given.
- As noted in the opening summary, tree and vegetation clearance at the centre of the site which included a TPO marked area was undertaken this summer without providing the Council with advance notice (5 days notice should have been provided)

- Under the current proposal, approximately 20 grade A&B trees and one TPO'd Oak will be removed, in addition to those removed in the summer clearance. These trees, especially those with TPO, should be retained in the design.
- Consultation with English Heritage (now Historic England), has highlighted the lack of archaeological baseline data for the area, and that the archaeological resource of the area has been 'severely underestimated'. The proximity of the site to medieval activity in Ickenham and the results of the Harefield to Southall Gas Pipeline investigations, which revealed prehistoric, Roman, medieval and post-medieval features and artefacts, implies a potential for previously unrecorded archaeological deposits within the site boundary. English Heritage provided a further update in 2011 highlighting again the potential for archaeology within the area of the site, and providing further details of the gas pipeline investigations, which identified evidence of late Iron Age / Roman period settlement activity, agricultural land-use and possible ritual sites within 700m of the proposed development site. English Heritage also stressed that the site is surrounded by areas which contain archaeological evidence of land-use and activity dating from the Iron Age through to the medieval period, and therefore considered there to be a reasonable potential for archaeological activity within the site. **Section 1.4.7** of the heritage asset survey confirmed that evaluation trenches would be required (because of recent archaeological discoveries in the surrounding area); although judgement will be required on the scope, position and number of trenches. **Policy HE1: Heritage** The Council will: conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and archaeologically significant areas, including Archaeological Priority Zones and Areas. To date there has been no confirmation of when these surveys will take place, and this should be a condition prior to any works taking place.

In conclusion, OFRA strongly objects to this proposal because of its height and density, and the overwhelming effects of over 1000 more residents on already-overstretched local health and education amenities.

Whilst we all agree that this site (and site B across Long Lane) needs to be re-developed soon, this cannot be at such a heavy cost to the quality of life of existing residents. For the scheme to harmonise with the local environment, the overall design height needs to be reduced to a maximum of 4-5 storeys, and roofs and uppermost floors should be pitched, recessed or have dormer elements introduced to soften the impact. These recommendations have already been made by independent peer reviews for previous designs, and could help to alleviate many of our residents' concerns.

Yours faithfully,

[Redacted Signature]

Chair of Oak Farm Residents' Association

25 OCT 2019

Middlesex

16.10.19.

Planning Services,  
London Borough of Hillingdon,  
3 North, Civic Centre,  
High Street, Uxbridge,  
UB8 1UW

Dear Sirs,

**Objections to Planning Application 4266/APP/2019/3088  
Former Master Brewer Site**

I am pleased that this land is to be used to provide much needed family homes instead of a Super Market. However, I must register my objections to the scale of this new proposal. My objections are listed below.

1) Height of Blocks 11 Storey Blocks would tower above any other building in the vicinity. Any development over 5/6 storeys would be totally out of keeping with the surrounding area

2) School Places/Doctors'/Dental Practices

514 Units – Presumably these units would house families. With only 2 children and 2 adults per family the number of additional people requiring places would exceed 2,000. Has any thought been given to families of greater size? Perhaps a Medical Centre should be incorporated into the “flexible commercial units” to lighten the load on already overloaded local Medical Centres.

3) Car Parking

165 spaces would engender an increase of vehicles onto already overcrowded local streets. Long Lane (Hillingdon and Ickenham) is already so heavily congested that it is almost impossible for local residents to access it from adjoining roads. Rush hours are a nightmare along the entire length of Long Lane. Currently, police cars, ambulances and fire engines experience difficulty in driving safely through Ickenham. It's an accident waiting to happen. Current frequent HS2 closures of Breakspear Road cause almost complete shut-down through Ickenham and will continue to do so for the foreseeable future.

4) Suggestion

Perhaps a better use of other land in this area would be provision of 2/3 storey car parking on the land previously occupied by a crane company, adjacent to Hillingdon Station. This could possibly encourage the use of trains instead of yet more road vehicles.

Yours faithfully,





OCT 2019

London Borough of Hillingdon

Planning Services

3North

Civic Centre

High Street

Uxbridge.

UB8 81VW

Ref. 4266/APP/2019/3088

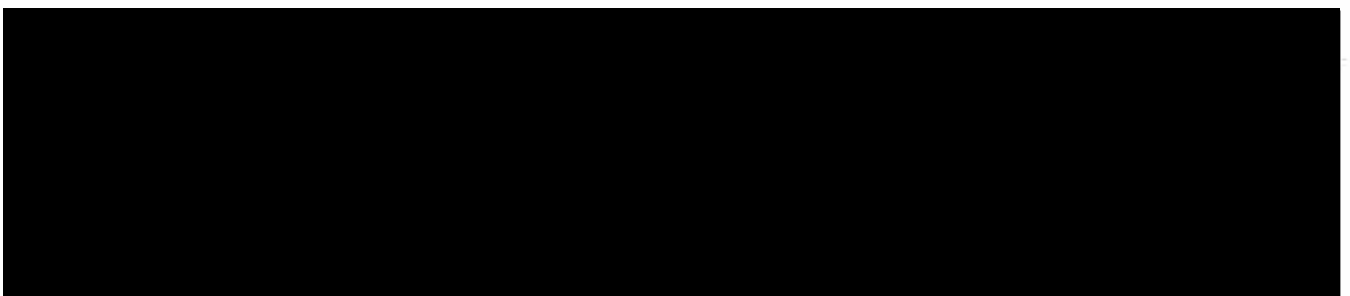
22/10/19

Dear Sirs,

We would like to register our strong objections to the above planning application. Previous applications for planning at this site have already requested a number of residential units far in excess of an acceptable amount of units for this site so this application for 514 is not acceptable.

The building of up to 11 stories is not in keeping with the surrounding areas where no buildings are above 3 or 4 stories. It would also be a considerable danger because of the proximity of Northolt Airport.

The number of units applied for will require far more parking spaces than applied for and the area around the site has zero capacity for any more parking. This application requests too many units and too many stories and must be rejected.







Applications Processing Team &lt;applicationsprocessingteam@hillington.gov.uk&gt;

**Fwd: Master Brewer - Planning Application - OBJECTION**

1 message

Planning . &lt;planning@hillington.gov.uk&gt;

25 October 2019 at 15:11

To: Applications Processing Team &lt;applicationsprocessingteam@hillington.gov.uk&gt;, [REDACTED]

FYI

----- Forwarded message -----

From: **Democratic Services** <Democratic@hillington.gov.uk>

Date: Fri, 25 Oct 2019 at 13:43

Subject: Fwd: Master Brewer - Planning Application - OBJECTION

To: Planning . &lt;planning@hillington.gov.uk&gt; [REDACTED]@hillington.gov.uk&gt;

Please see request from Cllr Lavery to add the objection to the planning consultation. Also, sent to [REDACTED]

----- Forwarded message -----

From: **Cllr Edward Lavery** <elavery@hillington.gov.uk>

Date: Fri, 25 Oct 2019 at 13:00

Subject: Fwd: Master Brewer - Planning Application - OBJECTION

To: Democratic Services &lt;Democratic@hillington.gov.uk&gt;, [REDACTED]

Please add this objection to the planning file.

----- Forwarded message -----

Date: Thu, 24 Oct 2019 at 15:31

Subject: Master Brewer - Planning Application - OBJECTION

To: Lavery, Edward &lt;ELavery@hillington.gov.uk&gt;

Dear Councillor Lavery

I am writing to you as Hillingdon Council's Cabinet Member for Planning and urge you, for the reason stated below, to reject the Planning Application submitted on behalf of Inland Homes Ltd.

Yours sincerely

**OBJECTION TO - NEW PLANNING APPLICATION****FORMER MASTER BREWER SITE, FREEZELAND WAY HILLINGDON**

In this latest, as well as the two previous planning applications, submitted on behalf of Inland Homes Ltd., most of the emphasis is placed to show how environmentally friendly such a development would be and how beneficial to those lucky enough to be able to move to the site once it is developed. The very name; "Hillingdon Gardens", creates an impression of suburban tranquillity.

We are told how the proposed development would deliver improvements that support the ten Healthy Streets indicators. How the developers would be creating a bio-diverse environment and making space for nature. And all this could be accomplished whilst filling an area of just 2.48 hectares (an area the size of 4 football pitches) with 514 residential units; flexible commercial units and ; 165 car parking spaces ; refuse and bicycle stores.

The developers also tell us, that car parking provision will be at a ratio of 0.3 spaces per dwelling and that in their view this will reduce car ownership on the site. This statement, surely, cannot be taken seriously.

One only has to look at any of the residential roads in the vicinity to the site to see that most households have either two or three cars in their driveways. Very few have just one or none. So why should car ownership in the new development be any different. If only 164 parking spaces are provided, then the other estimated 800 or so cars will just be parked on the streets, in the vicinity of their owners properties.

If the developers were so concerned about environmental issues, then perhaps they could explain to us why in their last three planning applications they had increased the number of residential units from 377 in August 2017, to 437 in November 2018 and to 514 units in their latest application. They have also increased the height of some of the buildings from 9 to 11 storeys. Surely a successive reduction in the number of residential units would be a more environmentally friendly solution.

It is not the development of the site itself that is at issue, it is the number of new residents and cars that this proposed development would bring to this relatively small area of Hillingdon. One could safely say that the proposed erection of 517 residential units would bring a population of well over 1000 to the site. There can be absolutely no doubt, therefore, that if this planning application were allowed to proceed then this would have extremely adverse consequences with regards to schooling and health care facilities and increase in the area.

These facilities are already oversubscribed, so any increase in the population in the area, no matter how small, would most certainly be detrimental to the well being of the local community.

The density of traffic is also an issue of great concern to those of us living in the area in close proximity to the site. Already now, traffic at times, is almost at a standstill. This obviously creates more pollution than would otherwise be the case. So adding yet approximately 800 or so more cars to the already existing traffic density and existing parking problems, can in no way be considered to be environmentally friendly.

So one can only assume that the developer's supposedly environmentally friendly credentials are just a form of camouflage, in order to get the local community onto their side. This, in order to build and sell as many residential units as they possible can get away with, without really considering the consequences of their action.

After all they will not have to provide the extra school places ; Hilling don Council will have to do that. Neither will they have to provide the extra health care facilities in the local area; the NHS will have to do that.

The provision of just 164 parking spaces on the new development, in my view, has absolutely nothing to do with reducing the car ownership, but has much more to do with the loss of valuable building land. After all, the provision of more parking spaces on the site would obviously reduce the number of properties built on the site and thus reduce profit margins.

So for the reasons stated above, I strongly object to the proposed Planning Application and urge the Planning Department of Hillingdon Council to reject it.

Yours sincerely,

informing 24 OCT 2019  
Planning Application  
for 42661 APP /  
2019 / 3088

21/10/2019

RE Former Merton Brewery site.  
Freeze land with [redacted] [redacted] [redacted]  
Submitted By [redacted]

I feel that properties up to  
(11) STOREYS HIGH ARE NOT  
PRACTICABLE AS THE NEARNESS  
of R.A.F ~~RAF~~ NORTH HOLT  
AIRPORT AND THE NEWLY (20 US)  
BUILT A40 MAIN ROAD AND  
METROPOLITAN AND VICARILLY TRAIN  
LINES ON THE EDGE of the site.

ALSO, THE PROPOSED 165 CAR PARKING  
SPACES DOES NOT SEEM TO BE ENOUGH [redacted]

Cont.

evenings away from residential  
therefore that site should be a  
Civic amenities and not housing  
ments. but used for local recre.  
Skepton, Hillingdon, Ruship &  
Hochridge.

However the more important  
point is that 11-story flats etc  
within the Air Traffic zone of Nor  
Borodrome and create a major  
for aircraft using Northolt. Nor  
is it a hazard for air traffic  
into Northolt the same applies  
take off flights, which should a  
failure occur on take off there.  
on that site could be wiped out  
causing a colossal number of  
deaths.

Please do not allow the M  
Brewer site to be used for  
development and certainly not  
rise buildings as described.

I object to this planning appl  
being granted. Yours Faithfully

23 OCT 2019

Planning Services,  
Residents Services,  
Planning,  
Civic Centre,  
High Street,  
Hochbridge.  
UB 8 1 UW.

Dear Sir/Madam.

Ref. 4266/APP/2019/3088

Former Master Brewer Site. Greezelon  
Hellingdon.

The Master Brewer Site was on  
a form of Civic amenity site use  
for pleasurable activities for the  
residents to enjoy great day.

22 Oct 2019

Head of Planning Services  
London Borough of Hillingdon  
Your Ref: 4266/APP/2019/3038

Dear Sir/Madam

FORMER MASTER BREWER SITE

(write to you, to oppose this application, for the following reasons.

This North Hillingdon part of the Borough already has the most traffic pollution of the entire Borough, except Heathrow.

Long Lane & my road, Victoria Ave. & Ryefield (part of) has traffic jams every working day, for up to four hours <sup>during</sup> rush hours. The latter two roads are used as 'rat runs' to avoid Long Lane. Also included, of course, is Windust Ave.

The infra structure, social, medical & public transport, is already at stretching point; plus shopping (post office, etc.).

The pollution is such that, I have to blow my nose, up to twelve (12) times, when eating a meal in my house. I don't suffer to this extent anywhere else.

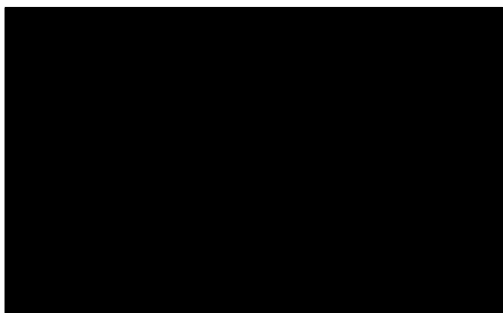
This requested development will exacerbate all the above problems.

→

~~Enough is enough.~~

~~We~~ do not allow more building for accommodation in this area.

Yours faithfully





The Owner and/or the Occupier

18 OCT 2019

11 October 2019

Dear Sir/Madam

**NEW PLANNING APPLICATION - YOUR CHANCE TO COMMENT**

The Council has recently received a planning application relating to :-

**4266/APP/2019/3088**

**FORMER MASTER BREWER SITE, FREEZELAND WAY HILLINGDON**

The application has been submitted by Mr Ben Johnson and proposes:-

**Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.**

We would like to inform you that the planning application at the above site may be of interest to you. Full details of the above application including plans can be viewed on the council's web site [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk) then click on 'Planning' and selecting "Planning search" from the drop down menu, enter in the above reference number and then click search.

If you wish to comment on the application this should be done on-line and you will receive a summary along with a reference number. Alternatively, you may submit your comments via letter addressed to Planning, Civic Centre, High Street, Uxbridge, UB8 1UW; however we are unable to acknowledge written comments.

Any comments you wish to make on this application must be received by **1st November 2019** . If you are

unable to reply within this time your comments may still be considered provided that a decision has not already been made.

Any comments you submit to the Council are added to the file and made available for public inspection. If you wish to copy any correspondence you make on this application to your Ward Councillor, you will be able to find their contact details at [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)

Please note that boundary disputes, party wall matters or the effect of the proposal on property value are not valid grounds for objecting to a planning application.

If you send in a petition you may have the right to address a Planning Committee about your concerns. To find out about sending in a petition please contact Democratic Services by telephoning 01895 250636 or by e-mail to [democratic@hillington.gov.uk](mailto:democratic@hillington.gov.uk)

Everyone making comments on this application will be informed of the Council's decision.

Yours Faithfully

London Borough Of Hillingdon Planning Services

Dearest Planning Committee  
My Aunt who served 45yrs uninterupted  
service in the Nat Health says Mental Health  
will be ~~report~~ reported in 20yrs time & the  
# of High Risk apartments been constructed.  
If u have kids clutching ① A another one in  
tow & your on the top floor of an apartment  
tower & the elevator on the blink your not  
going to take them to the green lungs (park).

Also its on the flight path into RAF air  
base - I've seen aircraft over the Hill of  
Hilda.

Anyway enough about that & on to more crucial  
things. I'm a paranoid schizo & I saw the  
canopy on the veranda of the Civic Centre  
& I thought it woz a statue of the blessed  
Virgin MARY. Rem the moving statues in the 1980s



**HILLINGDON**  
LONDON

22 OCT 2019

11 October 2019

Dear Sir/Madam

**NEW PLANNING APPLICATION - YOUR CHANCE TO COMMENT**

The Council has recently received a planning application relating to :-

**4266/APP/2019/3088**

**FORMER MASTER BREWER SITE, FREEZELAND WAY HILLINGDON**

The application has been submitted by Mr Ben Johnson and proposes:-

Construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (165 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development.

We would like to inform you that the planning application at the above site may be of interest to you. Full details of the above application including plans can be viewed on the council's web site [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk) then click on 'Planning' and selecting "Planning search" from the drop down menu, enter in the above reference number and then click search.

If you wish to comment on the application this should be done on-line and you will receive a summary along with a reference number. Alternatively, you may submit your comments via letter addressed to Planning, Civic Centre, High Street, Uxbridge, UB8 1UW; however we are unable to acknowledge written comments.

Any comments you wish to make on this application must be received by 1st November 2019 . If you are unable to reply within this time your comments may still be considered provided that a decision has not

**Planning Services  
Residents Services**

**T.01895 250230**

**[planning@hillington.gov.uk](mailto:planning@hillington.gov.uk) [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)**

**London Borough of Hillington,**

**3 North, Civic Centre, High Street, Uxbridge, UB8 1UW**

already been made.

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Please note that boundary disputes, party wall matters or the effect of the proposal on property values, are not valid grounds for objecting to a planning application.

If you send in a petition you may have the right to address a Planning Committee about your concerns. To find out about sending in a petition please contact Democratic Services by telephoning 01895 250636 or by e-mail to [democratic@hillington.gov.uk](mailto:democratic@hillington.gov.uk)

Everyone making comments on this application will be informed of the Council's decision.

Yours Faithfully

London Borough Of Hillingdon Planning Services

To,  
HILLINGDON COUNCIL

18/10/2019

Dear Sirs,

AS things stand, Hillingdon/Uxbridge is getting crowded with lots of developments having taken place in recent times

I object to the planning for the Old Market Brewer site as traffic & pollution would be a major factor that need to be taken into consideration.

Bad idea.  
We shall bear the brunt of it.





22 OCT 2019

London Borough of Hillingdon  
Planning Services  
3 North  
Civic Centre  
Uxbridge  
UB8 1UW

Re. 4266/APP/2019/3088 - Former Master Brewer Site

20th. October 2019

Dear Sir/Madam

I could refer to the letters I have written to you every 18 months/2 years since 2005 concerning the redevelopment of the former Master Brewer site but, instead, here we go again, from scratch. In its briefest form, my objection to the latest proposal is that this site is unfit for human habitation. However, when making a decision, I would be grateful if you would take all the following points into account.

The particular stretch of the A40 that runs alongside this site has the worst air quality in the borough with the exception of Heathrow, despite what the developers' report might have to say. Because the A40 descends under Long Lane and Hillingdon Station and forms a pocket, there is a particularly heavy accumulation of carbon monoxide and other toxic gases there, which slowly rises and then spreads across the site in question. With ever more persons suffering from asthma and other respiratory diseases, exposing residents, possibly for twenty-four hours a day, to fumes that will slowly poison them is hardly ideal.

The plans for car parking spaces are laughable. The proposed parking spaces are totally inadequate for the scale of development on the site. Of the one thousand (minimum) cars that future residents may have, where will the other 800+ park? On neighbouring roads, already unable to cope adequately with the parking requirements of current Hillingdon residents? There is nowhere else, when all other roads in the immediate area of the proposed development are double yellow lined.

Anyone living nearby, as I do, will already be aware that the Hillingdon Circus junction is busy at the best of times, and regularly gridlocked in the morning and evening. Long Lane is, after all, one of only three arterial roads connecting the south of Hillingdon with the north, and the most central of those three. I frequently find myself unable to leave the Oak Farm Estate by car before 9.30 a.m. or after 3 p.m. because of the appalling traffic congestion on Long Lane. Adding more than a thousand cars into that equation is not a socially responsible thing to do.

Just across the road from the proposed site is the Hillingdon Health Centre, and presumably that will be the most convenient surgery for all the proposed residents to register. I am a registered patient there, and already have to wait three weeks for an appointment to see a doctor unless it is an emergency. I do not particularly want to see that time rise to a month, which is what would happen if hundreds, maybe thousands, of new patients suddenly materialised.

Presumably the theoretical residents who might in the future live on the site if this application is passed will have children. In the case of those who are not crippled by asthma and other respiratory disease, where exactly will they go to school? The application boasts of the proximity of schools, but says nothing about how full they are. Hillingdon has already expanded as many schools as it can, until most of them are at bursting point and now lacking in any meaningful outdoor facilities thanks to new build. So where will all these extra children go?

I note that residential blocks eleven storeys high are proposed for the site. Isn't this a rather ridiculous, and risky, thing to do right next to a military airfield? I appreciate that aircraft do not take off and land over the site, but the newly refurbished runway would be less than two hundred metres away from the development. This may sound like fiction, but in this day and age the arsenal available to terrorists is considerable and Northolt Aerodrome is the preferred arrival point for many visiting dignitaries, as well as our politicians and royal family. My research tells me that a ground to air missile, and its launcher, are so miniaturised these days that they could fit into a rucksack. An eleven storey high vantage point would, I am sure, be greatly appreciated by any determined terrorist.

It is not the development of the site that I object to. I am not a NIMBY! I would be perfectly happy with a superstore, a shopping mall, a retail park, a cinema or health complex with a swimming pool, or anything that does not involve the provision of residential quarters. A school or hospital would be acceptable, so long as they were properly air conditioned. While these would still add to the traffic locally, the effect would not be so bad as it would be under the current proposals.

Briefly summarised, my reasons for entreating you to reject this application are as follows:

- The negative impact on health from being so close to the A40.
- The unrealistic proposals for car parking.
- The impact of more vehicles on local roads, and especially at Hillingdon Circus.
- The unacceptable pressure that yet more residents in that particular area would place upon doctors' surgeries, school provision and hospitals.
- The folly of placing high building so close to a military airfield.

For these reasons, I hope the Planning Sub-Committee will do as it has done on all the previous occasions, the right thing, and reject this application.

Yours sincerely



**PS. I would happily have submitted this online, but unfortunately my comments run to more than 3800 characters and will not be accepted by your website. Imposing a limit on comments, especially about an application of this scale, is very unreasonable.**

**I also have to tell you that your website is one of the most painfully slow that I have experienced, surely unnecessarily so in this day and age. Can't you do something about it?**

The Owner and/or the Occupier



11 October 2019

Dear Sir/Madam

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**London Borough of Hillingdon,**

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Everyone making comments on this application will be informed of the Council's decision.

Yours Faithfully

London Borough Of Hillingdon Planning Services

Dear Planning Dept, Hillingdon Council,  
We live at No 44 Halbord Road & object to the proposed application at former Master Brewer Site REF 4266/APP/2012/3088. Already there is much traffic congestion around this area particularly in morning & evening rush hour periods & this would be made much worse with the proposed new residential homes. There is not adequate road facility to cater for this. There are no senior schools close by & very little primary schools to cater for new residents. There is already limited no. of doctor/clinic facilities in the area. The development would be on the RAF flight path which could cause problems of noise, pollution & safety.

We feel the site would be much better used for a car park & possibly gym complex which would help with commuters already using a small car park at the station & a gym would create new jobs in the area & be a massive benefit to existing residents. If the site could be used to create jobs it would be better. Creating more homes here is not advisory / opinion.

XXXXXXX  
XXXXXXX  
XXXXX  
XXXXXX

Planning Department  
London Borough of Hillingdon

31 October 2019

Dear Sir

4266/APP/2019/3088

We are the owners and residents at XXXXXXXX in Ickenham and object most strongly to this inappropriate development proposal on the former Master Brewer site.

The XXXXXX is altogether on Green Belt land and at least partly in the Conservation Area

At present, the view to the south south west of the green belt farm land is only of green fields and trees, with no buildings in the sight line either in summer or in winter when the deciduous trees shed their leaves. The proposed development would impact severely on that view.

On page 1 Appendix F of the Townscape Visual Impact Assessment Table the proposers take account only of the view from Ickenham Manor, XXXXXXXXXXXXl. Is this omission deliberate because the impact would be so pronounced?

We note that in refusing the previous application for this Site, 4266/APP/2107/3183, the LPA stated on p51 of the Officers' Report "The August 2017 application TVIA verified views confirms the impact of the proposed four to nine storey development. It will need to be reduced to circa 4 to 5 storeys to mitigate the impact on surrounding historic assets such as Ickenham Manor and also the green belt. The existing long unhindered views in this location will now be severely impacted and intruded upon. The November 2018 scheme does exceed the height, scale and massing of the August 2017 scheme." This new proposal is now two storeys higher than the November 2018 scheme, up to 11 storeys plus building services plant on the roof, therefore this reason for refusal must surely stand and indeed be reinforced.

For these reasons we submit that the impact on the view from Long Lane Farm will be significant. Therefore the application does not comply with policy BE1 of the Local Plan and should be refused.

We rely on the Ickenham Residents Association to object to this development proposal on all other matters.

Yours sincerely

XXXXXXXXXXXXXXXX



Applications Processing Team &lt;applicationsprocessingteam@hillington.gov.uk&gt;

**Fwd: Master Brewer - Planning Application - OBJECTION**

1 message

Planning . &lt;planning@hillington.gov.uk&gt;

To: Applications Processing Team &lt;applicationsprocessingteam@hillington.gov.uk&gt;, [REDACTED]

25 October 2019 at 15:11

FYI

----- Forwarded message -----

From: **Democratic Services** <Democratic@hillington.gov.uk>

Date: Fri, 25 Oct 2019 at 13:43

Subject: Fwd: Master Brewer - Planning Application - OBJECTION

To: Planning . &lt;planning@hillington.gov.uk&gt;, [REDACTED]

Please see request from Cllr Lavery to add the objection to the planning consultation. Also, sent to [REDACTED]

----- Forwarded message -----

From: **Cllr Edward Lavery** <elavery@hillington.gov.uk>

Date: Fri, 25 Oct 2019 at 13:00

Subject: Fwd: Master Brewer - Planning Application - OBJECTION

To: Democratic Services &lt;Democratic@hillington.gov.uk&gt;, [REDACTED]

Please add this objection to the planning file.

Date: Fri, 25 Oct 2019 at 13:01

Subject: Master Brewer - Planning Application - OBJECTION

Dear Councillor Lavery

I am writing to you as Hillingdon Council's Cabinet Member for Planning and urge you, for the reason stated below, to reject the Planning Application submitted on behalf of Inland Homes Ltd.

Yours sincerely

**OBJECTION TO - NEW PLANNING APPLICATION****FORMER MASTER BREWER SITE, FREEZELAND WAY HILLINGTON**

In this latest, as well as the two previous planning applications, submitted on behalf of Inland Homes Ltd., most of the emphasis is placed to show how environmentally friendly such a development would be and how beneficial to those lucky enough to be able to move to the site once it is developed. The very name; "Hillingdon Gardens", creates an impression of suburban tranquillity.

We are told how the proposed development would deliver improvements that support the ten Healthy Streets indicators. How the developers would be creating a bio-diverse environment and making space for nature. And all this could be accomplished whilst filling an area of just 2.48 hectares (an area the size of 4 football pitches) with 514 residential units; flexible commercial units and ; 165 car parking spaces ; refuse and bicycle stores.

The developers also tell us, that car parking provision will be at a ratio of 0.3 spaces per dwelling and that in their view this will reduce car ownership on the site. This statement, surely, cannot be taken seriously.

One only has to look at any of the residential roads in the vicinity to the site to see that most households have either two or three cars in their driveways. Very few have just one or none. So why should car ownership in the new development be any different. If only 164 parking spaces are provided, then the other estimated 800 or so cars will just be parked on the streets, in the vicinity of their owners properties.

If the developers were so concerned about environmental issues, then perhaps they could explain to us why in their last three planning applications they had increased the number of residential units from 377 in August 2017, to 437 in November 2018 and to 514 units in their latest application. They have also increased the height of some of the buildings from 9 to 11 storeys. Surely a successive reduction in the number of residential units would be a more environmentally friendly solution.

It is not the development of the site itself that is at issue, it is the number of new residents and cars that this proposed development would bring to this relatively small area of Hillingdon. One could safely say that the proposed erection of 517 residential units would bring a population of well over 1000 to the site. There can be absolutely no doubt, therefore, that if this planning application were allowed to proceed then this would have extremely adverse consequences with regards to schooling and health care facilities and increase in the area.

These facilities are already oversubscribed, so any increase in the population in the area, no matter how small, would most certainly be detrimental to the well being of the local community.

The density of traffic is also an issue of great concern to those of us living in the area in close proximity to the site. Already now, traffic at times, is almost at a standstill. This obviously creates more pollution than would otherwise be the case. So adding yet approximately 800 or so more cars to the already existing traffic density and existing parking problems, can in no way be considered to be environmentally friendly.

So one can only assume that the developer's supposedly environmentally friendly credentials are just a form of camouflage, in order to get the local community onto their side. This, in order to build and sell as many residential units as they possible can get away with, without really considering the consequences of their action.

After all they will not have to provide the extra school places ; Hilling don Council will have to do that. Neither will they have to provide the extra health care facilities in the local area; the NHS will have to do that.

The provision of just 164 parking spaces on the new development, in my view, has absolutely nothing to do with reducing the car ownership, but has much more to do with the loss of valuable building land. After all, the provision of more parking spaces on the site would obviously reduce the number of properties built on the site and thus reduce profit margins.

So for the reasons stated above, I strongly object to the proposed Planning Application and urge the Planning Department of Hillingdon Council to reject it.

Yours sincerely,



Applications Processing Team &lt;applicationsprocessingteam@hillington.gov.uk&gt;

**Fwd: FW: Addendum to Master Brewer Objection**

1 message

**Planning** . <planning@hillington.gov.uk>

28 October 2019 at 10:30

To: [REDACTED]  
Cc: Applications Processing Team <applicationsprocessingteam@hillington.gov.uk>

Objection to planning application.

Regards  
[REDACTED]

Forwarded message

Date: Fri, 25 Oct 2019 at 17:31  
Subject: FW: Addendum to Master Brewer Objection  
To: planning@hillington.gov.uk <planning@hillington.gov.uk>

Addendum to my E-mail sent yesterday - 24-10-2019

Planning Reference: 4266/APP/2019/3088

Building density per Residential unit.

There have been two recent building re-developments in close proximity to the Master Brewer site.

A ) - at 297 Long Lane (former dairy depot)

Here 36 residential units are being constructed on an area of 0.26 ha

This equates to One unit per 72.22 square meters.

B ) - at Suttton Court Road (former Tommy Flynn P.H.)

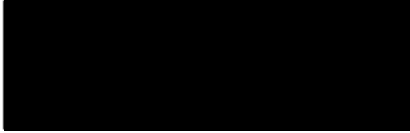
Here 26 residential were constructed on an area of 0.25 ha

This equates to One unit per 96.1 square meters.

The supposedly environmentally friendly developers of the new Hillington Garden site are proposing to construct 514 residential unit on some 2.48 ha.

This gives us a density of One unit per 48.25 square meters

This is approximately twice the density of the Tommy Flynn site and one and a half times that of the ex-dairy site. And this already vastly exceeds the housing density in the surrounding area.



Sent from Mail for Windows 10



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Please note that the comments made in this email represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination in relation to any application or planning matter.