

3 September 2020

Former Master Brewer site, Freezeland Way

in the London Borough of Hillingdon
planning application no.4266/APP/2019/3088

This addendum sets out various factual updates, clarifications and corrections which need to be considered in conjunction with the Representation Hearing Report originally published on 26 August 2020 (GLA ref: GLA/0995g/03).

Amendments to the report

To clarify:

Paragraph 23 should read: “A total of 164 car parking spaces are proposed for residential use only, parking is provided at; the ground floor in centralised parking areas, under podium gardens and on-street for residents and guests of the site. The proposals include a 10% provision of blue badge car parking and 20% of all spaces will include active electric vehicle charging points with the remaining spaces having passive electric charging capability. The proposal also includes ~~894~~ 918 cycle parking spaces spread across the site for residents, and a small provision for the commercial units on site.”

Paragraph 112 should read: “The provision of ~~973925.9~~ sq.m. of flexible commercial space (Use Class A1/A3/B1/D1) is appropriate considering site’s location in a Local Centre. The floorspace is compliant with the policies set out above.”

Paragraph 113 should read: “London Plan Policy 7.16 and ~~draft the Mayor’s Intend to Publish~~ London Plan Policy G2 afford Green Belt land the strongest protection in accordance with national guidance. The NPPF through paragraphs 133-147 affords the strongest possible protection to Green Belt. The NPPF provides that construction of new buildings should be regarded as inappropriate development in the Green Belt, save for certain limited exceptions set out in paragraph 145. Hillingdon Local Plan Part 1 Strategic Policies (2012) Policy EM2 establishes that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt. Policies, DMCI3, DMEI 4 and DMEI6 of the Local Plan Part 2 – Development Management Policies (2020) state that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances and that development adjacent to the Green Belt/open space should assimilate development through extensive peripheral landscaping and not negatively impact on amenity, ecology and functionality. In this context it is noted that the Council considered that the proposals failed to secure substantial planting and landscaping, resulting in a stark and oppressive built form when viewed from the surrounding area and a detrimental impact on Green Belt openness.”

Paragraph 116 should read: “The applicant has also acquired a strip of privately-owned Green Belt land directly between the site and the wider body of Green Belt, ~~within which~~ Enhancement works are proposed to the wider body of Green Belt land to the east of the site which will be secured through a contribution in the S.106. All of these measures serve to minimise the visual impact on the Green Belt, enhance biodiversity and provide a soft urban edge to the open land at this edge of the site, in line with the requirements of the above-mentioned policies.”

Paragraph 224 should read: “The proposed development would be most prominent in Viewpoints 3B, 5C, 6, 7 and 14 which are within the immediate vicinity of the site and Local Centre. The 7, 8 and 11 storey buildings would be considerably taller than the existing 2 and 3 storey context of the Local Centre and suburban surrounds, the new buildings would be separated from this by significant highways infrastructure. The prominence of the 8 storey ‘gateway’ building would be further reduced by the significant set back from the highway to the south. The impact of the 7, 8 and 11 storey buildings when viewed from Long Lane would be mitigated by the separation distance, change in levels and mature vegetation along the embankment. GLA officers consider that the development would sit comfortably in this mixed urban context with no detrimental visual impact. This is discussed further below where GLA officers address the impact on the character and appearance of the area more generally.”

Paragraph 248 should read: “Conditions are recommended in relation to the detailed design of elevations, facing materials and balconies. Subject to these requirements being met, GLA officers consider that the scheme would provide high quality architecture, which would respond appropriately to the local context, in line with the NPPF; London Plan Policies 7.4 and 7.6; ~~draft the Mayor’s Intend to Publish~~ London Plan Policies D1, D3, D4, D8 and D9; and Hillingdon Council Local Plan Part 1 Strategic Policies (2012) Policy BE1 and Hillingdon Council Local Plan Part 2 Development Management Policies (2020) Policies DMHB10, DMHB11 and DMHB12.”

Paragraph 280 should read: “The proposal includes ~~918-931~~ cycle parking spaces spread across the site for residents and their visitors (including within the ‘Cycle hub’). 40 cycle parking spaces (8 long stay and 32 short stay) are included for the non-residential elements. This meets the minimum standards set by London Plan Policy 6.13 and Policy T5 of the Mayor’s Intend to Publish London Plan. Hillingdon’s committee report recognises this compliance and confirms that “this is acceptable in format and design layout terms and the quantum conforms to and exceeds Hillingdon’s Local Plan policy DMT 5 standard which would require a figure in the region of approximately 591 spaces. Whilst the quantum of cycle parking far exceeds the LBH standards, the provision does accord with the minimum London Plan and the Mayor’s Intend to Publish London Plan standards and is therefore deemed to be acceptable.” It is noted that Council officers raised concerns regarding the ‘excessive’ provision of cycle parking but this did not feature as a reason for refusal. The details of the cycle parking provision are recommended to be secured by condition, which should be in line with London Cycling Design Standards (LCDS) as required by London Plan and the Mayor’s Intend to Publish London Plan.”

Paragraph 315 should read: “London Plan Policy 5.15 and ~~draft the Mayor’s Intend to Publish~~ London Plan Policy SI.5 require that development should minimise the use of mains water. Following the Mayor’s consultation response at Stage 1 the applicant submitted additional information which shows compliance with London Plan water efficiency requirements for both the residential and non-residential components. The proposed dwellings will have a maximum indoor water consumption of 105 litres/person/day, and the non-residential components of the development will target a minimum BREEAM rating of ‘excellent’. Subject to conditions to secure these features, the proposal accords with Policy 5.15 of the London Plan and Policy SI5 of the Mayor’s Intend to Publish London Plan.”

Updates

Since the GLA originally published its Representation Hearing Report (26 August 2020 - GLA ref: GLA/0995g/03) the Mayor has received 6 additional representations objecting to the scheme including one from the London Borough of Hillingdon Council and Oak Farm Residents’ Association.

Representations received from members of the public can be summarised as follows:

- Over delivery of housing within the borough
- Traffic impacts and generation
- The development will set a precedent
- Appropriateness of the Mayor recovering the application and decision making powers
- Appropriateness of tall buildings, height and massing
- Planning policy conflict
- Lack of community infrastructure including Doctors surgery
- Community impacts
- Impact to local character
- Environmental Impact Assessment

The objection received from the London Borough of Hillingdon establishes that no objection is raised in principle to the residential led mixed use redevelopment of the site but maintains the 8 reasons for refusal (available at paragraph 33 of the representation hearing report) that formed its draft decision notice. In addition to this the Council has provided a technical response on air quality produced by AQE Global (August 2020). It should be noted that the Council has requested (should the GLA be minded to approve the scheme) a contribution of £218,139 to be paid to Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposals that reduce vehicle emissions and or reduce human exposure to pollution levels. GLA officers note that this contribution has not been agreed and is subject to further discussion. More generally the grounds for objection can be summarised under the following headings:

Design

- Insufficient design changes
- Size and scale
- Height and massing
- Impact to local character, streetscape and views
- Impact to adjoining Green Belt
- Density
- Tall buildings in this location
- Poor design
- Reduction in quality of public realm
- Heritage impacts

Housing

- Daylight/sunlight for proposed units
- Noise levels within the development
- Air quality
- Insufficient private amenity space

Transport

- Unacceptable rise in traffic
- Pedestrian safety
- Highway impacts (including congestion)
- Inadequate provision of car parking spaces

General

- Discrepancies with regards to inputs for the transport and air quality assessments
- The Fire strategy is not considered finalised

All representations received in respect of this application have been made available to the Mayor; however, in the interests of conciseness and for ease of reference, the issues raised have been summarised as detailed above and within the representation hearing report. The representations received do not raise any new planning matters which have not already been considered as part of the assessment and, where appropriate, through the proposed planning conditions, planning obligations and/or informatives outlined in the representation hearing report (published on 26 August 2020 - GLA ref: GLA/0995g/03).

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