

Your Ref: TR010019

Examining Authority's (ExA) First Written Questions and Requests for information

Question	Council Response
National Policy Statement for National Networks (NN NPS)	
1.1 Having regard to the criteria listed in para 1.2 of the National Policy Statement for National Networks (NNNPS), is there any reason why the application should not be determined in accordance with the NPS?	<p>It is not considered that the applicant's submission sufficiently satisfies the criterion of paragraph 1.2 with regard to the scheme not resulting in adverse impacts outweighing its benefits. The impacts of the scheme are significant and don't appear to have been fully addressed within the submission.</p> <p>Furthermore, the Scheme could potentially lead to the Secretary of State being in breach of a duty imposed by legislation in that the Council believe the identification of the Scheme as Low Risk in terms of EU limit value compliance is not a correct interpretation of the EU Air Quality Directive (2008/50/EC). Given the judgement handed down <u>R (Client Earth) v the Secretary of State for the Environment, Food and Rural Affairs (2013) UKSC (2014) EUJC C-404/13 (2015) UKSC 28</u> the Council is clear that air quality must not be made worse where it is already non complaint and in breach of the legislation even where the increase in limit value is slight. The Council are therefore, concerned that Highways England's approach to the EU Limit Value test is potentially unlawful.</p>
1.2 To what extent would the project deliver the objectives of NNNPS to increase the capacity and improve the performance of the Strategic Road Network?	The Applicant purports that the scheme by its very nature will increase capacity. It is questionable as to whether the scheme would improve performance as the lack of a hard shoulder has the potential to cause significant delays in the event that an accident occurs along the smart motorway as proposed.
1.3 Would the project deliver appropriate environmental and social benefits as required by NNNPS para 3.3?	It is not considered that the scheme has clearly demonstrated any environmental benefits.
1.4 Are the local authorities satisfied that the traffic forecasts	No. We still do not understand the extent to which we can expect traffic migration to the

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and economic case for the project have been adequately tested through the use of the M3/M4 variable demand transport model, and that the requirements of paras 4.5 and 4.6 of NNNPS have been met?	principal and local road network. We are particularly concerned with pressure from HGVs in the Heathrow villages and impact on already congested roads such as A408 Stockley Road, A312 Hayes Bypass and A4020 Uxbridge Road. The concern applies both to the construction period and after completion of the scheme.
1.5 Does the Thames Valley Multi Modal Study (TVMMS) provide an adequate assessment of options to comply with the requirement in NNNPS para 4.27?	Within London we expect that use is made of TfL's WELHam Model.
1.6 Are the local authorities satisfied that the applicant has demonstrated good design as required by NNNPS paras 4.32 to 4.34?	No- the designs and scale of some of the installations are significant and adversely impact on the local area and residents living close to the site.
Local Development Plans	
2.1 Does the applicant accurately identify the Development Plans and Transport Plans currently in place for each of the 11 local authorities Table 1, APP-089 against which the application falls to be assessed?	No- all policies and documents which have not been considered are set out in Appendix 1.
2.2 Do the local authorities agree the applicant's assessment of the project against the relevant policies of each Council? If not, please identify any areas of conflict and explain the reasons why the project would be in conflict.	<p>The Council's concerns are set out at [INSERT]. Additionally, there has been no attempt to set out the amount of energy used as would be expected in any major development, and how this will be reduced through the use of renewable energy for example.</p> <p>The development is likely to result in a significant draw down of power in the London area yet without any requirement of an assessment would indicate it is being treated differently to all other major developments. Policy 5.2 of the London Plan is the relevant policy as is EM8 of the Local Plan.</p>
2.3 Are there any developments which are either proposed in or	There are currently significant concerns about the relationship between the proposed

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in accordance with Local Plans which might be affected by the project? If so, please identify and explain what the effects would be.	development and the supporting road network. The modelling information provided is not clear, yet it must be assumed that there would be an increase in movements on the local network. If this is the case then it could impact upon current and committed development in terms of those supporting junctions. .
2.4 Is the scheme compatible with regional and local strategies to increase uptake and mode share for public transport, walking and cycling?	No. The scheme is likely to increase severance. Considerable effort is needed to mitigate the worsening conditions, especially the Sipson Road subway area and along the Public Rights of Way
Green Belt	
3.1 The scheme includes the widening of the M4 at junctions of the motorway to alter sliproads; the construction of new overbridges; and the widening of underbridges. To what extent would these works have an impact on the openness of the Green Belt and constitute inappropriate development? To what extent would these operations have an impact on the five purposes of including land in the Green Belt?	The scheme will have impacts upon the openness of the Green Belt as the M4 will encroach closer towards the Green Belt boundaries. In this regard, we have highlighted that greater detail is required about the proposed replacement planting (which has not yet come forward) to manage the impact on the Green Belt.
3.2 In respect of proposed new gantries, to what extent would their construction have an impact on the openness of the Green Belt and constitute inappropriate development? To what extent would they have an impact on the five purposes of including land in the Green Belt?	One of the five purposes that the Green Belt is to preserve the setting and special character of historic towns. As set out above, the Council wish to see sufficient detail of the replacement planting to ensure there are no detrimental impacts on the setting and special character of adjoining conservation areas and listed buildings.
3.3 Six potential construction compounds are proposed. To what extent would they have an impact on the openness of the Green Belt and constitute inappropriate development? To what extent would these operations have an impact on the five purposes of	Clarity on the selection of construction sites is required so that the impacts can be fully understood and assessed. Considerable concern exists with the construction site possibly proposed off A408 Stockley Road due to its impact on the local highway network and protected species, which have been found at the site.

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including land in the Green Belt?	
Environment ; Environmental Statement	
<p>4.1.1 Chapter 5 Section 5.5 APP-145 sets out the methodology for establishing the baseline for the Environmental Impact Assessment (EIA). Are consultees and interested parties satisfied with the approach as adopted?</p>	<p>No.</p> <p>The methodology for air quality proposes that a significant effect will only occur where there is an increase of 0.4ugm of NO2 even if it is in an area exceeding EU limit values. This highly questionable as set out in section 1.1 above and is further nor compatible with the NPPF or local policies.</p> <p>In addition, the Council is concerned that the assessment of air quality did not adequately describe the impacts on health. No health impact assessment has been undertaken which is surprising given the extent of additional emissions in highly sensitive areas. The methodology only relates to a more mathematical exercise in terms of exceedences but does not go to the depths of presenting the health effects of the scheme as would be expected.</p>
<p>4.1.4 An outline of the CEMP APP-293 is provided. The approval and implementation of the CEMP is secured through Requirement 8 of the draft DCO APP-026 . The outline CEMP sets out a series of proposed measures and standards applied by the Highways Agency (as was) and its contractor throughout the construction period. The final CEMP will be certified to BS EN ISO 14001. Do any interested parties have any comments on the sufficiency of the outline CEMP for securing mitigation? The ExA would be interested in particular in comments from NE, the EA and the LPAs who would be responsible for approving the CEMP under requirement 8 of the DCO.</p>	<p>The Council has concerns in relation to the current version of the CEMP due to its limited detail. The Council is further concerned that Highways England are able to modify the CEMP '<i>at any time</i>' after the authorised development has commenced. The Council would request that any amendment to the DCO to ensure any amendments to the CEMP are approved in writing by the Council.</p>

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<p>4.1.5 Requirement 8 allows the undertaker to modify the CEMP at any time after the authorised development has commenced without the requirement to seek the agreement of the LPA and without any reference to what has been assessed within the ES. There is also no requirement for the CEMP to deliver the mitigation measures identified in the ES, where the ES is relying on the CEMP as the mechanism to deliver the mitigation. Therefore, please explain how the EIA can rely on this mitigation when concluding on the residual significance of the development?</p>	<p>The Council query in the first instance how the ES can rely on the published draft CEMP which is significantly lacking in any detail to make its conclusions within the ES.</p> <p>The Council agree that changes to the CEMP post confirmation of the draft DCO need to be issued to the Council for written approval.</p>
<p>Environment; Landscape and visual impact</p>	
<p>4.2.2 Has the baseline information for the landscape and visual impact assessment (LVIA) been agreed with relevant stakeholders?</p>	<p>The Council have in principle agreed the baseline information for the LVIA however, the Council still await winter views.</p>
<p>4.2.11 Although Cumulative effects are discussed APP-148 , can the applicant confirm that the scope of the cumulative assessment has been agreed with relevant stakeholders?</p>	<p>The applicant asked the Council for details of applications to be included in the cumulative assessment but then seemingly did not use these in the cumulative assessment. Please see Appendix 2, which sets out all the relevant developments that should be considered.</p>
<p>Ecology and Nature Conservation</p>	
<p>4.4.3 Table 9.5 APP-149 sets out the significance of the residual effect of the scheme on ecology and nature conservation. Is there any evidence to challenge the conclusions set out in this Table?</p>	<p>Not all the relevant surveys and information have been made available, specifically with regard to the proposed construction compound where protected species have been found. The development itself (not including the construction compound) is unlikely to result in a significant effect but further details are still required, and the applicant should be</p>

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	<p>contributing to enhancement not simply mitigation.</p>
<p>Air Quality</p>	
<p>4.6.1 Chapter 6 Section 6.3 APP-146 sets out the air quality regulatory/policy framework. The NNNPS para 5.13 states: “The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision.” Having regard to the final judgement of the Supreme Court in the “ClientEarth” case, does the assessment of air quality impacts set out in the ES indicate that the scheme would comply with this requirement of the NNNPS?</p>	<p>Please refer to section 4.1.1 above for previous comments.</p> <p>The ES indicates an increase in concentrations as a result of the Scheme on a road that is currently identified as non-compliant and will still be so in 2022. There are no mitigation measures identified to address this issue. With this in mind the council is of the opinion that without mitigation this Scheme does not comply with the NNNPS.</p> <p>Concerns raised in the Council's LIR in regard to the modelling methodology under-estimating concentrations, the assessment not taking a worse case approach in terms of Euro 6/V1 emissions and the historic trend analysis of no downward trend all support the Council's concerns that there could be exceedences in 2022. There is no mitigation suggested. With this in mind, should the Council's concerns be proved a reality, this Scheme would not comply with the NNNPS.</p>
<p>4.6.2 To what extent have the local authority Environmental Health Officers and Air Quality Officers been consulted on the assessment set out in Chapter 6? APP-146 Can the applicant, local authorities and other interested parties identify areas of agreement and disagreement with regard to the assessment of air quality impact set out in the ES?</p>	<p>The Council requested additional information on methodology and were sent numerous document. The Council have also requested details on numbers of cleaner vehicles assumed in the fleet, rate of ingress, assumed emissions from the vehicles. This has not yet been received.</p> <p>The Council has sought expert advice on the current HE's methodology for calculating emissions, which is not available publicly. The Council's consultant has requested the document directly from HE.</p> <p>The Council's concerns are all highlighted in the LIR.</p>

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4.6.4 Has the study area for the assessment of construction effects and for the assessment of operational effects been agreed with the local authorities?	No
4.6.6 Paras 6.2.7 to 6.2.14 of Chapter 6 APP-146 sets out details of sensitive receptors that may be affected by changes in air quality as a result of the construction and operation of the scheme. Some 3,275 sensitive receptors are identified. To what extent has the definition and identification of sensitive receptors been agreed with local authorities and any other relevant stakeholders?	The Council is not aware of any process where receptors were agreed prior to the assessment.
4.6.7 Whilst the regional air quality assessment set out under para 6.15.11 APP-146 provides results for both the opening year (2022) and the design year (2037) of the scheme, the detailed level assessment, as described in paras 6.2.55 to 6.2.64 APP-146 limits predictions to the baseline year (2013) and the opening year. Can an assessment of local air quality effects be provided for the design year with and without the scheme?	The Council supports the suggested approach and would give the full operational impacts at capacity in 2037.
4.6.8 Chapter 6 Section 6.16 APP-146 deals with cumulative impacts. Have the key statutory bodies agreed the scope of the cumulative assessment? Are there any additional developments which should be included in the assessment?	No- the Council provided a full list of relevant developments to be included in the applicants cumulative assessment, but only 2 developments were included. Please see Appendix 2 which sets out all the relevant developments that should be considered. Please also note earlier comments about reasonably foreseeable development in section [INSERT].
Noise and Vibration	
4.7.1 Do the local authorities agree that the locations of sensitive receptors and the areas most exposed to noise from	Yes, the locations in LBH are correctly identified.

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major roads have been correctly identified (Figure 12.1 APP-253 to APP-256)?	
4.7.2 Has the baseline for the assessment of noise and vibration including the spatial scope (study area) for both construction and operational phases of the scheme together with the identification of the 21 monitoring locations been agreed with local authorities?	Yes, although the Council are concerned with the existing high levels of noise and the impact of traffic noise from the Scheme, especially in relation to Cranford Park Conservation Area and whether sufficient mitigation will be provided.
Cultural Assets	
4.8.1 Chapter 7 Table 7.3 APP-147 concludes that there would be no more than moderate adverse impacts on cultural heritage assets or their setting during the construction phase of the scheme, and no more than slight adverse impacts on the setting of cultural heritage assets during operation of the scheme. Does any party have evidence to challenge this conclusion?	The Council has requested winter views and provision of additional planting in areas (see Local Impact Report) in order to mitigate any impacts of the scheme on the local heritage assets.
Effects on all travellers	
4.9.1 The assessments have been undertaken in accordance with the general principles and structure of assessment methodology contained within Design Manual for Roads and Bridges (DMRB)1 Volume 11, Section 2, Part 5 HA 205/08 'Assessment and Management of Environmental Effects' APP-352 , which has been applied, as appropriate, and tailored to the context of the proposed development. Has the approach to the assessment used, and its results, been agreed with relevant stakeholders?	The Council is unaware of the approach having been agreed.

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Engineering and Design	
5.1 To what extent have the local authorities and road user bodies been involved in the engineering and design of the project?	The Council has had no involvement in the engineering and design of the project.
5.7 Are the local authorities satisfied that the solution chosen for each of the overbridges or underbridges in their Council area are appropriate?	The Council are currently in a very early stage of discussions in relation to the one subway, namely the Sipson Road M4 subway area. The Council are keen for the other subways and their surrounding areas to be improved and upgraded.
Traffic Safety	
6.1 The Road Safety Audit (RSA) APP-096 is based on the terms of reference of the DMRB document HD/03. That document has now been replaced by HD/15. To what extent does the RSA require updating to meet the terms of reference of the latest advice? Can such an update be provided?	The RSA does require updating to accord with the current standards within HD/15.
6.13 Is there any new evidence which has emerged since April 2014 which could impact on the hazard scores in the hazard log?	Evidence should be collected from TfL.
Socio-economic impacts	
7.1 Does the scheme comply with the need to be designed to minimise social and environmental impacts and improve quality of life in accordance with para 3.2 of the NNNPS?	No.

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Appendix 1: Local Planning Policies

Hillingdon Local Plan Part 1- Adopted November 2012

Policy	Policy Guidance
HE1: Heritage	<p>The Council will:</p> <ol style="list-style-type: none"> 1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes..... <p>Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;.....</p> <p>; and</p> <p>Archaeologically significant areas, including Archaeological Priority Zones and Areas.</p> <ol style="list-style-type: none"> 2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant. 3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities. 4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.
BE1: Built Environment	<p>"The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all</p>

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	<p>residents. All new developments should:</p> <ol style="list-style-type: none"> 1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place; 2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;..... 6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services; 7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;....."
<p>Policy EM1: Climate Change Adaptation and Mitigation</p>	<p>The Council will ensure that climate change mitigation is addressed at every stage of the development process by:</p> <ol style="list-style-type: none"> 2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency..... 6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions..... 8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.....

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	<p>The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:</p> <p>10. Locating and designing development to minimise the probability and impacts of flooding.</p> <p>11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.</p> <p>12. Giving preference to development of previously developed land to avoid the loss of further green areas.</p> <p>13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks.....</p>
<p>EM6: Flood Risk Management</p>	<p>The Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF).</p> <p>The subsequent Hillingdon Local Plan: Part 2 -Site Specific Allocations LDD will be subjected to the Sequential Test in accordance with the NPPF . Sites will only be allocated within Flood Zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.</p> <p>The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.</p>
<p>EM7: Biodiversity and Geological Conservation</p>	<p>The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority .</p> <p>Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:</p>

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	<p>1. The conservation and enhancement of the natural state of:..... Colne Valley Regional Park....</p> <p>2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.</p> <p>3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.</p> <p>4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.</p> <p>5. The provision of biodiversity improvements from all development, where feasible.....</p> <p>7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.</p>
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Hillingdon UDP Sep 1998 (Saved policies Sep 2007)

Policy	Policy Guidance
Policy BE4:Conservation Areas	New development within or on the fringes of conservation areas will be expected to preserve or enhance those features which contribute to their special architectural and visual qualities; development should avoid the demolition or loss of such features. There will be a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area. Applications for planning permission should contain full details, including siting and design, or replacement buildings. Applications for consent for demolition will depend upon the submission and approval of such details.

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BE10: Listed Buildings	Planning permission or listed building consent will not normally be granted for proposals which are considered detrimental to the setting of a listed building.
BE19: Residential Amenity	The Local Planning Authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area.
BE34: River Corridors	<p>When considering proposals for development adjacent to or having a visual effect on rivers the Local Planning Authority will, where appropriate, seek:</p> <ul style="list-style-type: none"> (i) To ensure and where possible enhance the role of the river and its immediate surroundings as a wildlife corridor; (ii) Environmental improvements to waterside areas; (iii) Building designs which complement the visual qualities of the riverside; (iv) Public access to the waterside linked to the footpath network in the surrounding area; (v) A minimum 6 metres of land reserved and landscaped alongside rivers, suitable for public access; and (vi) To enhance or create views through and from the development, from and towards the watercourse.
BE39: Tree Preservation Orders	The Local Planning Authority recognises the importance of tree preservation orders in protecting trees and woodlands in the landscape and will make orders where the possible loss of trees or woodlands would have a significant impact on their surroundings.
OE1: Environmental Considerations	<p>Planning permission will not normally be granted for uses and associated structures which are, or are likely to become, detrimental to the character or amenities of surrounding properties or the area generally, because of:</p> <ul style="list-style-type: none"> (i) The siting or appearance; (ii) The storage or display of vehicles, goods, equipment or other merchandise;

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	<p>(iii) Traffic generation and congestion;</p> <p>(iv) Noise and vibration or the emission of dust, smell or other pollutants,</p> <p>Unless sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable.</p>
OE3: Noise	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, lay-out or administrative measures.
AM3: Road Construction and Improvement	<p>Proposals for new roads or widening of existing roads will only be permitted if the primary justification is:</p> <p>a) To improve safety; or</p> <p>b) To promote pedestrian movement, cycling or public transport, or other improvement of the environment; or</p> <p>c) To reduce existing local congestion in a cost effective way, consistent with council objectives for safety, the environment, walking, cycling, public transport, accessibility and mobility; or</p> <p>d) To promote the economic regeneration of an area by improving its accessibility in a cost effective way, consistent with council objectives for safety, the environment, walking, cycling, public transport and mobility; or</p> <p>e) To accommodate vehicular trips likely to be generated by new development in areas where improvements to public transport cannot provide sufficient capacity to accommodate the increased demand and where the work, along with any complementary traffic calming measures and parking controls in nearby streets judged to be necessary by the local highway authority or the local planning authority, is funded by the development.</p>
AM7: Pedestrians and Wheelchair	The Council will accord priority to the needs and comfort of pedestrians in the design and implementation of road construction and traffic management schemes except where safety considerations dictate otherwise. In particular it will seek to minimise the diversion of pedestrian routes from pedestrian desire lines and the delays experienced by pedestrians at signal controlled road

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Users	crossings.
AM9: Cyclists	<p>The council will:</p> <p>(i) Provide a network of well signposted cycle routes throughout the borough to promote safer cycling and better conditions for cyclists, using predominantly either quiet roads or purpose built cycleways; particular attention will be paid to the provision of suitable routes to schools and contributing additions to the London-wide strategic cycle route network;</p> <p>(ii) Take account of the needs of cyclists in the design of highway improvement schemes;</p> <p>(iii) Promote secure, attractive and adequate cycle parking facilities in the boroughs town centres, public transport interchanges and at other major attractions, and will require development proposals to include clearly visible, well-designed, covered, secure and accessible bicycle parking for users of the development and where appropriate, for the general public.</p>

Planning Obligations SPD 2014

- 3.5 Following the adoption of the LB Hillingdon Community Infrastructure Levy (CIL), the Council revised the Planning Obligations SPD in 2014 to ensure planning obligation requests relate to site specific mitigation, in accordance with the Planning Act 2008. Chapters 5 and 8 are relevant to the current proposals with regard to ensuring appropriate mitigation is secured for the LB Hillingdon.

Noise SPD 2006

- 3.6 Noise has a significant effect on the environment and on the quality of life enjoyed by individuals and communities. The DCO proposals raise a number of noise concerns, both during the construction phase and the operational phase of the works. All mitigation proposed within this LIR accords with the SPD and national tests for the imposition of appropriate planning obligations and mitigation.

LB Hillingdon

Mandip Malhotra; 8th October 2015

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Appendix 2- Letter sent to HE re Cumulative development

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Further to your letter dated 12th December and received 24th December 2014, please find below details of schemes located within the borough that we wish to have considered as part of your ES.

It is noted that your own letter identified only 1 scheme, and for completeness, this site has been included at the top of the table below.

Proposals	Address	Planning references	Date Received (if under consideration)	Date Approved/Refused (if determined)
Current Applications				
Section 73 application seeking a variation to condition 2 (approved plans) of planning permission ref. 38065/APP/2014/2143 (Re-development of the site to provide 5 industrial units (Use Class B1(c), B2 and B8) with associated parking, servicing and landscaping (Involving demolition and refurbishment of existing units) dated 2/12/14) to remove the 2 metre gap between units 2 and 3 by extending either or both units	EC House, Swallowfield Way, Hayes	38065/APP/2015/206	20/1/15	
Redevelopment of the site to provide 6 industrial units (Use Classes B1(c), B2 and B8) and the provision of associated landscaping, parking and service space (involving demolition of existing building).	Silverdale House, Pump Lane, Hayes	49670/APP/2014/3855	13/11/14	
Conversion and extension of existing office building to form a 200 bedroom hotel with banqueting suite, conference facilities, and rooftop restaurant, including a seven-storey extension to rear, a three storey addition at roof level, and single-storey side extension, together with the creation of a new vehicle access, and alterations to car parking and landscaping	1 Nobel Drive, Harlington	46214/APP/2014/2827	03/09/14	
Determined applications				
Proposed mixed-use redevelopment comprising: 773 dwellings comprising 12no. studios, 152 no. 1-bedroom flats, 316no. 2-bedroom flats, 21no. 2-bedroom houses, 23no. 3-bedroom flats, 181no. 3-bedroom houses, 59no. 4-bedroom houses and 9no. 5-bedroom houses;	Former London Air Traffic Control Centre (NATS), Porters Way, West Drayton	5107/APP/2009/2348		Approved-02/11/09

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Class D1 Primary Healthcare facility including room for joint community use (up to 1085sqm gea); Class C2 Nursing Home (up to 3630sqm gea); Classes A1-A3 Shop units to complement Mulberry Parade (up to 185sqm gea, depending on size of Primary Healthcare facility); Class B1 Business units including site management office (up to 185sqm gea); Energy Centre (up to 220sqm gea) with combined heat and power unit; foul water pumping station; associated access roads from Porters Way (and excluding all access including pedestrian and bicycle access from Rutters Close); 1085 car parking spaces; cycle parking; public open space areas; cycleways and footpaths; and landscaping works (Outline Application)				
Stockley Park, business/office park	Stockley Park , Stockley Road, West Drayton	Historic extant consent for industrial use.		Approved -1980
Southall Gas Works redevelopment	LB Ealing			
Western International Market	LB Hounslow Please confirm when the modelling work was undertaken and if it includes the recently opened Costco store and other units within the site.			
Outline planning application for a mixed use development of the Old Vinyl Factory site including the demolition of up to 12,643 sqm of buildings and construction of up to 112,953 sqm (112,953 sqm includes the retention and re-use of 784 sqm of the Power House and 901 sqm Pressing Plant) of new floorspace. Uses to include up to 510 residential units (maximum area of 49,000 sqm GEA), up to 7,886 sqm of new B1 floorspace, up to 4,000 sqm of A class uses (A1, A2, A3, A4, A5), up to 4,700 sqm of D1 and D2 uses, an energy centre (up to 950 sqm), car parking, works to access and creation of new accesses and landscaping.	The Old Vinyl Factory, Blyth Road, Hayes	59872/APP/2012/1838		Approved - 19/4/13
Demolition of warehouse extension to Apollo House and erection of a part 4, part 5, part 6 and part 7 storey building comprising 132 residential units, cafe (Class A3), community room (Class D2), 5 x workshop units (Class B1, B8 or A2 uses), and associated car parking and landscaping.	Gatefold Development, Blyth Road, Hayes	51588/APP/2011/2253		Approved - 27/3/12
Comprehensive redevelopment of the site to provide a part 11, part 9, part 5 and part 4 storey building comprising 120 residential units, office	20 Blyth Road, Hayes	1425/AP/2011/3040		Approved - 08/04/13

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floorspace, 97 car parking spaces and hard and soft landscaping.				
Original consent: Erection of a four storey building to provide 6,966sq.m of Class B1(a) Office floorspace, provision of 70 associated car parking spaces at basement level, associated landscaping and ancillary works. S73 permission: Variation of condition 14 (contamination) of planning permission 40652/APP/2012/2030 granted 5 July 2013 for the Erection of a four storey building to provide 6,966 sq.m of Class B1(a) Office floorspace, provision of 70 associated car parking spaces at basement level, associated landscaping and ancillary works.	Hyde Park Hayes, Unit 4, Millington Road, Hayes	40652/APP/2012/2030 40652/APP/2013/1981		Approved - 05/07/13 Approved - 09/09/13
Original permission: Erection of five storey building to provide 13,880sq.m of Class B1(a) Office floorspace, provision of car parking spaces at surface and basement level, associated landscaping and ancillary works. S73 permission: Variation of condition 14 (contamination) of planning permission 45753/APP/2012/2029 (Erection of five storey building to provide 13,880sq.m of Class B1(a) Office floorspace, provision of car parking spaces at surface and basement level, associated landscaping and ancillary works).	Hyde Park Hayes, Unit 5, Millington Road, Hayes	45753/APP/2012/2029 45753/APP/2013/1980		Approved - 05/07/13 Approved - 09/09/13
Original consent: Mixed use development comprising 7,310 sqm (gea) industrial/warehousing unit (Use Classes B1c, B2, B8); 7998 sqm (gea) retail store (Use Class A1) and petrol filling station, together with associated car parking, landscaping and alterations to adjacent highway.	Unit 3, Millington Road, Hayes	32157/APP/2011/872		Planning refusal 20/4/12 Appeal allowed 15/11/12
New 3 Form of Entry primary school (630 students) plus a nursery (45 students) and a Special Resource Provision Unit for approximately 12	Eastern end of Lake Farm country park,	68911/APP/2012/2983		Approved - 14/5/13

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pupils, associated car parking, hard and soft play areas, sports pitches, pedestrian and vehicular access routes and landscaping.	Between Botwell Lane and Botwell Common Road			
Change of use of existing building from office (Use Class B1(a)) to Hotel (Use Class C1), including 4-storey side extension (to rear of adjacent petrol station), and 4-storey rear extensions, and associated amendments to landscaping and car parking.	272-276 Bath road, Heathrow, UB3	464/APP/2013/2115		Approved - 21/3/14
Change of use of existing building from office (Use Class B1(a)) to 123-room Hotel (Use Class C1), including 4-storey side extension (to rear of adjacent petrol station), and 4-storey rear extensions, and associated alterations to landscaping and car parking.	272-276 Bath road, Heathrow, UB3	464/APP/2014/1210		Approved - 31/7/14
Change of use of existing building from office (Use Class B1(a)) to 136-room Hotel (Use Class C1) and one flat for staff, including 4-storey side extension (to rear of adjacent petrol station), and 4-storey rear extensions, and associated alterations to landscaping and car parking.	272-276 Bath road, Heathrow, UB3	464/APP/2014/2886		Approved - 9/1/15
Demolition of existing buildings and erection of a five storey, 192-bedroom hotel, basement and surface level car parking, bar/restaurant, meeting rooms and other associated works.	1 and 1a Bath Road, Heathrow	35805/APP/2009/2433		Approved - 1/2/12
Erection of a part four, part five, part six storey, 623-bedroom hotel with ancillary restaurant/bar facilities, landscaping, parking for 354 cars and associated works.	276 Bath Road, Heathrow	35293/APP/2009/1938		Approved - 28/5/10
Demolition of existing hotel and erection of two hotels: one 4-star hotel with 250 bedrooms, and one budget hotel with 353 bedrooms, together with associated parking and landscaping.	Heathrow Park hotel, Bath Road, Longford	3063/APP/2009/415		Approved - 14/9/09
Redevelopment of site to provide a 5 star luxury hotel (560 rooms), a conference and ballroom facility, a new 20-lane bowling centre, car parking, landscaping and associated works (including demolition of existing Airport Bowl premises and car park).	Airport Bowl, Bath Road, Heathrow	38807/APP/2008/3493		Approved - 16/3/09
Part outline, part full planning application for a proposed hotel development of up to 660 bedrooms (approximately 30,000sq.m) with ancillary cafe, bar and restaurant facilities, car parking, service access, courtyard space, landscaping and improved ground level pedestrian access including public realm improvements (all outline application) and a perimeter veil structure wrapping around the hotel buildings (in full application detail).	Former Contractor's Compound, South Of Swindon Road Heathrow Airport	67622/APP/2013/2532		Approved - 30/7/14
Demolition of existing warehouse buildings and erection of 602 bedroom	Site Of Building 717	50657/APP/2013/2214		Approved -

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8-storey hotel with associated car parking (Outline application including details of access, appearance, layout and scale - landscaping reserved).	Located Between Sheffield Way And Southern Perimeter Road Heathrow Airport			9/7/14
Relevant Refusals subject to Appeal				
APPEAL BY: Heathrow Airport Limited Enabling works to allow implementation of full runway alternation during easterly operations at Heathrow Airport including the creation of a new 'hold area' at the western end of the northern runway, the construction of new access and exit taxiways, and the construction of a 5 metre high acoustic noise barrier to the south of Longford Village.	Northern Runway, Heathrow Airport	LPA REF: 41573/APP/2013/128 8 PINS REF: APP/R5510/A/14/222 5774		Refused 21/3/14

Projects Identified in the relevant Development Plan**Hillingdon's Local Plan: Part 2 - Site Allocations and Designations**

The Council has consulted on the draft Local Plan Part 2, which ended on 4th November 2014. The next stage of the Local Plan process is submission to the Secretary of State for Communities and Local Government. A Report to Cabinet on the outcome of consultation is timetabled for March 2015 to seek agreement on the next stage of the plan making process, submission.

A copy of the document can be found on the council website by following this link: <http://www.hillingdon.gov.uk/media.jsp?mediaid=32151&filetype=pdf>

LB Hillingdon

Mandip Malhotra; 8th October 2015

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