

Paddington Packet Boat, High Street, Uxbridge UB8 2HT

Planning Statement

ON BEHALF OF PADDINGTON PACKET BOAT DEVELOPMENTS LTD

May 2026

Contents

1. Introduction	3
2. Site and Surroundings	5
3. Site Planning History	7
Application ref. 1058/APP/2024/1013 / Appeal ref. APP/R5510/W/25/3360212	8
Other Relevant Planning History	8
4. Pre-application Engagement	9
Pre-Application Meeting 1	9
Pre-Application Meeting 2	9
5. Development Proposals	11
Proposed Amendments	11
6. Planning Policy	15
National Planning Policy Framework	15
The Development Plan	15
<i>Article 4 Direction relating to small HMO's in Hillingdon</i>	15
7. Planning Considerations	16
8. The Planning Balance and Conclusion	18

1. Introduction

1.1 This application is submitted to the London Borough of Hillingdon (“the Council”) under Section 73 of the Town and Country Planning Act 1990 on behalf of Paddington Packet Boat Development Ltd (“the Applicant”). It seeks to vary Condition 2 (Accordance with Approved Plans) attached to planning permission ref. 1058/APP/2021/3423, granted on 8 September 2023 (as subsequently amended by application ref. 1058/APP/2024/1013 and Appeal ref. APP/R5510/W/25/3360212). The approved development comprises:

“Demolition of the public house (Sui Generis) and erection of purpose-built student accommodation (Sui Generis), including associated common areas and facilities, landscaping, amenity space, bicycle and motorcycle parking, and refuse storage.”

1.2 This Section 73 application seeks consent for a further set of amendments to the approved scheme. These comprise minor external changes, including the addition of a single-storey rear projection (8 sqm), revisions to the external amenity space, and alterations to fenestration. Internally, the proposals would increase the number of student units (from 61 to 73) within a comparable gross internal floor area, achieved through a reduction in the average studio size. The ground floor layout has also been amended to provide a communal amenity space with direct access to the rear external amenity area.

1.3 The original planning permission (ref. 1058/APP/2021/3423) approved a 61-unit purpose-built student accommodation (‘PBSA’) scheme, of which 22 units (36%) were secured as affordable student accommodation through the accompanying Section 106 Agreement.

1.4 In April 2024, application ref. 1058/APP/2024/1013 was submitted under Section 73 Town and Country Planning Act 1990 to vary Condition 2 of the original permission. These amendments primarily responded to design changes required to ensure compliance with Building Regulations and did not alter the approved floorspace. The application also sought to amend the tenure mix by replacing the approved affordable student accommodation with market rent provision.

1.5 The proposed removal of affordable accommodation (36%, equating to 22 studio units, secured via the Section 106 Agreement) was driven by viability constraints, which indicated that delivery of the approved quantum of affordable units would render the scheme unviable.

1.6 The Local Planning Authority refused the application on 13 September 2024 on two grounds: the loss of affordable student accommodation and the absence of a completed Section 106 Agreement to secure necessary planning obligations.

1.7 An appeal (ref. APP/R5510/W/25/3360212) was subsequently submitted and heard on 3 July 2025. In determining the appeal, the Inspector considered three scenarios: (i) removal of all affordable provision (as proposed by the Applicant); (ii) retention of 36% (as sought by the Council); and (iii) a reduced provision of 20%.

1.8 In the decision dated 28 August 2025, the Inspector concluded that a reduced provision of 20% affordable student accommodation (12 studio units) represented an appropriate and viable balance, in light of the evidence that both parties (being the Appellant, and the Council) had presented.

1.9 Notwithstanding the appeal outcome, viability challenges remained. The Applicant, in collaboration with the Project Architect, undertook a review of the internal layout, identifying scope to increase the number of studio units by 12 within the approved building envelope, without compromising the quality of accommodation or associated communal facilities.

1.10 These revisions were presented to the Council through a formal pre-application PPA process (see Section 4). Discussions also addressed affordable housing provision, and the Council has confirmed (via email dated 03 March 2026, and again in their formal pre-application response letter dated 01 April 2026) that it would accept the continued delivery of 20%

affordable student accommodation, consistent with the appeal decision, subject to commencement within 12 months of any new Section 73 permission.

- 1.11 Most pre-commencement conditions attached to the original permission have now been discharged. Through the PPA process, it was also agreed that the trigger points for two remaining pre-commencement conditions could be amended to 'prior to above ground works'. This change has been submitted under a Section 96A application (ref. 1058/APP/2026/1112, April 2026) and is due to be determined by 5th June 2026. One further pre-commencement condition relating to piling works has also been submitted (application ref. 1058/APP/2026/1072) and is due to be determined by 26th June 2026.
- 1.12 Notwithstanding the approval of these applications (anticipated by June 2026), the Applicant is already in a position to lawfully demolish the existing structure to implement the consent, and following the remaining discharge of condition application being approved, groundworks can commence.
- 1.13 However, no above-ground works will commence until a viable scheme, namely the development proposed under this Section 73 application, has been approved.

Scope of the Planning Statement

- 1.14 The purpose of this Planning Statement is to appraise proposals in the context of the Development Plan and other material considerations. The Statement is set out as follows:
- Section 2 describes the site and surroundings.
 - Section 3 sets out the planning history for the Site.
 - Section 4 details pre-application discussions with the Council.
 - Section 5 describes the proposals.
 - Section 6 identifies the Development Plan for the area.
 - Section 7 assesses the proposals against relevant policy and other material considerations.
 - Section 8 draws together the conclusion of the report.

Scope of the Supporting Information

- 1.15 Alongside this Planning Statement, the planning application comprises the following documents:
- Application Form.
 - Site Location Plan, prepared by Benchmark Architects.
 - Approved and Proposed Plans and Elevations, prepared by Benchmark Architects.
 - Travel Plan Statement, prepared by Rappor.
 - Transport Statement, prepared by Rappor.
 - Daylight and Sunlight Report, prepared by Schroeders Begg.
 - Noise Assessment, prepared by RSK Acoustics.
 - Air Quality Assessment, prepared by Air Quality Consultants.

2. Site and Surroundings

Site Context

- 2.1 Paddington Packet Boat is located at a prominent site on the corner of High Street and Packet Boat Lane in Uxbridge, UB8 2HT. The vacant pub itself is a two-storey white rendered building set close to the road. The pub dates back to circa. 1826. The pub and its beer garden occupy the eastern side of the site fronting onto the High Road. A car park, to the rear, occupies the western half of the site.

Figure 2.1.1 Site Location



- 2.2 High Road is a busy road of 4 lanes of traffic that links Yiewsley in the south and Uxbridge in the north.
- 2.3 The existing built environment in the area ranges substantially in terms of height and appearance. On the opposite side of High Road are low-set single storey bungalows, while to the north of the site on the opposite side of Packet Boat Lane are a series of detached two storey dwellings. South of the site are flats ranging between 2 and 3 storeys. Directly west and adjoining the site is Packet Boat House, a 41 unit, 5 storey residential development.
- 2.4 Further along and on the north side of Packet Boat Lane is Union Park, a 133 unit residential development. The complex is comprised of buildings of 5 storeys set back from Packet Boat Lane, and with frontage to the canal.
- 2.5 The Paddington Packet Boat is also located within the setting of two grade II listed buildings to the north of the site. They are Barnacre, New Peachey Lane, a 17th-century timber-framed house, and the Old Cottage, High Road, a timber-framed late-medieval hall house.
- 2.6 With Brunel University campus located just 16 minute walk, a 7 minute cycle or a 13 minute bus trip from the site, this to be an excellent opportunity to provide much-needed student accommodation in the London Borough of Hillingdon. The

site would be served by two local parades and regular bus services to both Uxbridge and Yiewsley/West Drayton town centres, the latter of which will be served by a Crossrail Station providing good access to West and Central London.

Allocations and Designations

- 2.7 The site is not subject to any specific allocations or policy designations. It is not within a Conservation Area and there are no statutorily listed buildings at or within the vicinity of the site.
- 2.8 The site was however Locally Listed in 2017, due to it being a landmark corner building set at an angle to the junction, with origins dating back to ca. 1800. The original form was however much altered, but some original features remained.
- 2.9 The site is identified as being within Flood Zone 1 by the Environment Agency's Flood Mapping, representing the lowest risk of flooding. However, the site lies in close proximity to areas identified as Flood Zone 2 and Flood Zone 3.

Listing Application 2019

- 2.10 On the 12 June 2019, Hillingdon Council served a Building Preservation Notice over the site. Over the following six month period the site was assessed by Historic England (case no: 1465335) to confirm whether the building should be listed. Historic England concluded:

“After examining the available records and other relevant information and having carefully considered the architectural and historic interest of this case, the criteria for listing are not fulfilled. The Paddington Packet Boat Public House is therefore not recommended for listing”.

- 2.11 Further analysis was provided in the Heritage Report prepared by Corrie Newell Historic Buildings Consultancy, which was submitted in support of the original application.

3. Site Planning History

3.1 Planning permission (ref. 1058/APP/2021/3423) was granted for the Site on 8 September 2023 for the following development:

“Demolition of the public house (Sui Generis) and erection of purpose-built student accommodation (Sui Generis), including associated common areas and facilities, landscaping, amenity space, bicycle and motorcycle parking, and refuse storage.”

3.2 The Delegated Officer’s Report for the application identified a strategic need for new student accommodation across London, recognising the important contribution that higher education providers make to the capital’s economy and society. The report acknowledged that the effective functioning of universities should not be constrained by a lack of appropriately priced, good-quality accommodation.

3.3 A key benefit of purpose-built student accommodation (PBSA) was considered to be its potential to release existing housing stock elsewhere in the borough from use as shared HMOs for students, thereby improving access to larger homes for existing and future residents.

3.4 The report also noted that the development would result in the complete loss of the existing public house, considered to be a non-designated heritage asset, and would give rise to a less than substantial level of harm to the setting of the Grade II listed Old Cottage to the north. In accordance with the NPPF, the identified heritage harm was weighed against the public benefits of the proposal. It was concluded that the redevelopment of a vacant brownfield site, together with the delivery of a policy-compliant level of student accommodation, would provide sufficient public benefits to outweigh the identified harm.

3.5 The proposal was also considered acceptable in amenity terms, with no significant adverse impacts anticipated for nearby occupiers, while providing a good standard of accommodation for future residents, including communal amenity space to the rear. The scheme would provide on-site cycle parking, three motorcycle spaces, and one wheelchair-accessible parking space. Financial contributions would also be secured to support the consultation on, and implementation of, a new parking management scheme, including the potential provision of additional on-street blue-badge spaces. Future occupiers would not be eligible for parking permits. Consequently, the development was not considered to have a significant impact on the surrounding highway network or local parking provision.

3.6 Overall, the report concluded that the scheme would deliver a number of significant benefits and recommended the application for approval.

3.7 The permission was subject to a Section 106 Agreement and a number of planning conditions, eight of which require discharge prior to the commencement of development (whether including or excluding demolition).

3.8 Applications to discharge the majority of these pre-commencement conditions were submitted to the Local Planning Authority (LPA) in 2024 and have subsequently been approved. However, several pre-commencement conditions remain outstanding. As set out in Section 4 of this Planning Statement, pre-application discussions with the LPA considered whether the trigger points for two of the three remaining conditions could be amended to require submission prior to above-ground works. The LPA confirmed its agreement with this approach.

3.9 Accordingly, in April 2026 a Section 96A application (ref. XXX) was submitted to the LPA to amend the wording of Condition 8 (Fire Statement) and Condition 10 (Surface Water Drainage Scheme).

- 3.10 Concurrently, an application was submitted to discharge the remaining pre-commencement condition (LPA ref. XXX). Subject to the approval of both applications, the extant planning permission will be capable of lawful commencement and implementation.
- 3.11 In any event, development at the Site will commence by 8 September 2026, being the three-year expiry date of the extant planning permission.

Application ref. 1058/APP/2024/1013 / Appeal ref. APP/R5510/W/25/3360212

- 3.12 The approved scheme, if delivered, would provide 61 PBSA studio units, of which 22 (36%) were secured as affordable student accommodation.
- 3.13 Following a client review of scheme viability, it was concluded that the development could not be viably delivered with 22 affordable studio units. Accordingly, planning application ref. 1058/APP/2024/1013 was submitted to the LPA in April 2024 under Section 73, seeking to vary Condition 2 (Approved Plans) of permission ref. 1058/APP/2021/3423. The proposed amendments comprised design changes required to ensure compliance with Building Regulations and did not alter the approved floorspace. The description of development was:
- “Variation of Condition 2 (Accordance with Approved Plans) of planning permission ref. 1058/APP/2021/3423, dated 08.09.2023 [...] to make design changes, remove affordable student accommodation from the development and replace it with market rent student accommodation.”*
- 3.14 The Section 73 application also sought to remove the requirement to provide affordable student accommodation, which had been secured at 36% (22 studio units) through the Section 106 Agreement attached to the original permission.
- 3.15 The application was refused by the LPA on 13 September 2024 for two reasons: the loss of affordable student accommodation and the absence of a completed Section 106 Agreement to secure necessary planning obligations.
- 3.16 An appeal against this decision was lodged with the Planning Inspectorate on 6 February 2025 and was heard at a hearing on 3 July 2025.
- 3.17 In determining the appeal, the Inspector considered three scenarios: (i) removal of all affordable accommodation on viability grounds, as proposed by the Applicant; (ii) retention of 36% (22 studio units), as sought by the Council; and (iii) a middle-ground provision of 20% (12 studio units).
- 3.18 The appeal decision, issued on 28 August 2025, concluded that provision of 12 affordable studio units (20%) represented a viable and appropriate outcome.
- 3.19 Furthermore, in the Inspector’s decision, it was concluded that the site is suitable for redevelopment, recognising that the existing use is no longer economically viable and that the building has remained vacant for a prolonged period. In land-use terms, the principle of redeveloping the site for an alternative use is therefore considered acceptable, subject to compliance with all other relevant development plan policies. The loss of the former public house is not considered to result in unacceptable harm to the vitality or social infrastructure of the area, particularly given the availability of alternative facilities within reasonable proximity.

Other Relevant Planning History

- 3.20 Whilst there is further planning history relating to the Site, predating the applications mentioned above, those applications are not considered material to either the extant consent or the current Section 73 application.

4. Pre-application Engagement

4.1 The Applicant entered into a PPA agreement with the LPA in October 2025 to discuss the scope of this planning application, through two agreed pre-application meetings relating separately to Planning Principles and PBSA standard of accommodation, as well as Viability and Affordable Housing.

4.2 The Council issued their formal pre-application response via a report dated 01 April 2026.

Pre-Application Meeting 1

4.3 An initial pre-application meeting was held with the Council on Tuesday 4 November 2025 and attended by the Applicant, Nexus Planning acting as planning consultants, and Benchmark Architects as project architects. This meeting solely related to the proposed design changes sought as part of this Section 73 planning application.

4.4 During the meeting, the proposed design amendments were presented to the Council alongside the rationale underpinning the changes. At that stage, it was proposed to amend the floorplan to deliver a 75-unit scheme, representing an uplift of 14 units, with an average room size of 16.4 sqm. Amendments to the ground floor layout were also presented in response to officers' informal comments regarding the provision and arrangement of internal communal amenity space.

4.5 Following subsequent pre-application discussions with the Council, the scheme was amended to reduce the total uplift to the number of units from 75 to 73 (representing an uplift of 12 units). This change responded specifically to officer comments relating to the internal arrangement of the ground floor and the positioning of the communal amenity space in relation to the principal entrance.

4.6 The communal amenity space was subsequently repositioned to the rear of the ground floor, where it overlooks and provides direct access to the external amenity area. This revised arrangement was supported by the Council.

4.7 In relation to the proposed reduction in average room size, the Council advised that the initially proposed average studio size of 16.4 sqm fell within the generally accepted range for PBSA studio accommodation, which typically ranges between 15–25 sqm across comparable schemes in London. As set out further in Section 5 of this Planning Statement, the average room size has since marginally increased and is therefore considered to remain acceptable.

4.8 Officers also raised concerns regarding the visual impact of the lift overrun within the roofscape. In response, revised floor plans were informally presented to the Council which demonstrated the repositioning of the lift overrun to a more central location within the building. This amendment reduced its visual prominence when viewed from the public realm, and the revised approach was supported by Officers.

Pre-Application Meeting 2

4.9 A second pre-application meeting was arranged to discuss the viability position relating specifically to the delivery of affordable accommodation within the proposed uplift in studio units. The meeting was to be attended by the Council, the Council's independently appointed viability consultant, and the viability consultant acting on behalf of the Applicant.

4.10 However, prior to the meeting taking place, it became evident that the respective viability consultants held different views on the viability of the scheme proposals.

4.11 Accordingly, it was therefore considered appropriate for the respective planning teams to seek a pragmatic compromise position, informed by the evidence provided by the viability consultants. Through the same correspondence, Nexus Planning proposed an affordable housing provision which sat between the two competing positions and was also heavily

informed by the appeal-approved scheme, equating to 20% affordable PBSA provision across the proposed 73-unit scheme. This would result in the delivery of 15 affordable student units.

- 4.12 This approach aligned the revised scheme with the proportion of affordable accommodation secured under the appeal-approved development and would secure an additional three affordable PBSA units within the London Borough of Hillingdon.
- 4.13 The Council confirmed its in-principle acceptance of this approach via email dated 3 March 2026, and subsequently reiterated this position within its formal pre-application response dated 1 April 2026. The Council confirmed that acceptance of the proposed 20% affordable provision was supported as an exception in this instance, subject to commencement of the development within 12 months of the date of the decision. The Applicant is committed to meeting this requirement. The Council further advised that, should development not commence within this timeframe, a further viability review would be required to reassess the level of affordable housing provision. A late-stage review mechanism would also continue to apply.
- 4.14 Accordingly, this Section 73 application has been submitted on the agreed basis of delivering 20% affordable PBSA accommodation as part of the proposed development.

5. Development Proposals

5.1 This Section 73 application has been submitted to the London Borough of Hillingdon seeking variation of Condition 2 (Approved Plans) attached to planning permission ref. 1058/APP/2021/3423, granted on 8 September 2023, as subsequently amended under application ref. 1058/APP/2024/1013 and Appeal ref. APP/R5510/W/25/3360212. The approved development comprises:

“Demolition of the public house (Sui Generis) and erection of purpose-built student accommodation (Sui Generis), including associated communal areas and facilities, landscaping, amenity space, bicycle and motorcycle parking, and refuse storage.”

5.2 This Section 73 application seeks consent for a further series of amendments to the approved scheme. The proposed changes comprise minor external alterations, including the addition of a single-storey rear projection measuring approximately 8 sqm, revisions to the external amenity space, and amendments to the fenestration strategy.

5.3 Internally, the proposals seek to increase the number of student accommodation units from 61 to 73 units, within a broadly comparable gross internal floor area, facilitated through a modest reduction in the average studio size. Amendments have also been made to the ground floor layout to provide an improved communal amenity space with direct access to, and overlooking, the rear external amenity area.

5.4 As set out in Section 4 of this Planning Statement, the Council has agreed that the proposed development may deliver a below-policy level of affordable PBSA, comprising in this instance 20% affordable PBSA provision equating to 15 affordable student units, subject to commencement of the development within 12 months of the date of any planning permission.

5.5 This agreed position was informed by extensive viability assessment work undertaken by both the Applicant’s viability consultant and the Council’s independently appointed viability consultant, alongside consideration of the appeal-approved scheme and its associated affordable housing provision.

5.6 The Applicant is committed to delivering the development on this agreed basis. Accordingly, viability matters are not considered to be in dispute and do not form part of the substantive planning considerations associated with this Section 73 application.

Proposed Amendments

5.7 The minor amendments proposed to the plans as approved under application ref. 1058/APP/2024/1013 and Appeal ref. APP/R5510/W/25/3360212 are summarised below (with reference to the plan or drawing that would be changed):

Current Drawing	Amended Drawing	Comment
02-91-100 – Site Location Plan	No change.	No change.
02-91-102 – Site Survey	No change.	No change.
02-91-103 – Existing Elevations	No change.	No change.
02-91-104 – Existing Street Elevation 1	No change.	No change.
02-91-105 – Existing Street Elevation 2	No change.	No change.

02-91-106 – Demolition Plan	No change.	No change.
02-02-101 (Rev. G) – Site Plan	02-02-101 (Rev. K) – Site Plan	Updated to reflect amended floorplans.
02-03-100 (Rev. J) – Level 00 GA Floor Plan	02-03-100 (Rev. R) – Level 00 GA Floor Plan	Updated to reflect amended floorplans.
02-03-101 (Rev. G) – Level 01 GA Floor Plan	02-03-101 (Rev. P) – Level 01 GA Floor Plan	Updated to reflect amended floorplans.
02-03-102 (Rev. G) – Level 02 GA Floor Plan	02-03-102 (Rev. N) – Level 02 GA Floor Plan	Updated to reflect amended floorplans.
02-03-103 (Rev. G) – Level 03 GA Floor Plan	02-03-103 (Rev. R) – Level 03 GA Floor Plan	Updated to reflect amended floorplans.
02-03-104 (Rev. G) – Level 04 GA Floor Plan	02-03-104 (Rev. R) – Level 04 GA Floor Plan	Updated to reflect amended floorplans.
02-03-105 (Rev. G) – Level 05 Roof Plan	02-03-105 (Rev. M) – Level 05 Roof Plan	Updated to reflect amended floorplans.
02-02-111 (Rev. D) – Proposed Landscaped Site Plan	No change.	No change.
02-04-101 (Rev. D) – Section A-A	No change.	No change.
02-04-102 (Rev. D) – Section B-B	No change.	No change.
02-05-101 (Rev. J) - Elevation A-A	02-05-101 (Rev. M) - Elevation A-A	Updated to reflect amended floorplans.
02-05-102 (Rev. H) – Elevation B-B	02-05-102 (Rev. L) – Elevation B-B	Updated to reflect amended floorplans.
02-05-103 (Rev. G) – Elevation C-C	02-05-103 (Rev. L) – Elevation C-C	Updated to reflect amended floorplans.
02-05-104 (Rev. H) – Elevation D-D	02-05-104 (Rev. L) – Elevation D-D	Updated to reflect amended floorplans.
02-05-105 (Rev. H) – Elevation E-E	02-05-105 (Rev. L) – Elevation E-E	Updated to reflect amended floorplans.
02-05-106 (Rev. G) – Elevation F-F	02-05-106 (Rev. L) – Elevation F-F	Updated to reflect amended floorplans.

5.8 The minor amendments proposed to the submitted documents are summarised below (with reference to the document that would be changed):

Current Document	Amended Document	Comment
Marketing Report (August 2021)	No change.	No change.
Marketing Evidence (13-12-21)	No change.	No change.
Marketing Evidence (20-07-22)	No change.	No change.
Student Accommodation Needs (August 2021)	No change.	No change.
Phase 1 Geoenvironmental Desk Study (June 2021)	No change.	No change.
Archaeological Desk-Based Assessment (February 2021)	No change.	No change.
Air Quality Assessment (February 2024)	Air Quality Technical Note (May 2026)	Update to reflect increased student numbers proposed.
Travel Plan Statement (February 2024)	Travel Plan Statement (April 2026)	Update to reflect increased student numbers proposed.
Transport Statement (February 2024)	Transport Statement (April 2026)	Update to reflect increased student numbers proposed.
Planning Statement (May 2022)	No change.	No change.
Car Parking Survey (05-04-22) (Ref: VRP1391-01)	No change.	No change.
Daylight and Sunlight Report (June 2022)	Daylight and Sunlight Report (April 2026)	Updated to reflect amended floorplans.
Daylight and Sunlight Supplementary Statement No. 2 (September 2022)	No change.	No change.
Design and Access Statement (Rev. L) (27-03-24)	Design and Access Statement (Rev. P) (08-01-2026)	Updated to reflect amended floorplans, and increased student numbers proposed.
Noise Break-In Assessment (January 2024)	Noise Break-In Assessment (April 2026)	Updated to reflect amended floorplans.
Draft Fire Statement Form (10-06-22)	No change.	No change.

5.9 In order to accommodate these minor amendments to the approved scheme, Condition 2 will need to be varied to reflect the revised drawings, plans and documents. The current drafting, as approved under application ref. 1058/APP/2024/1013 and Appeal ref. APP/R5510/W/25/3360212, is as follows:

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

02-91-100, 02-91-102, 02-91-103, 02-91-104, 02-91-105, 02-91-106, 02-02-101 (Rev. G), 02-03-100 (Rev. J), 02-03-101 (Rev. G), 02-03-102 (Rev. G), 02-03-103 (Rev. G), 02-03-104 (Rev. G), 02-03-105 (Rev. G), 02-02-111 (Rev. D), 02-03-200, 02-03-201, 02-03-202, 02-03-203, 02-03-204, 02-04-101 (Rev. D), 02-04-102 (Rev. D), 02-05-101 (Rev. J), 02-05-102 (Rev. H), 02-05-103 (Rev. G), 02-05-104 (Rev. H), 02-05-105 (Rev. H), and 02-05-106 (Rev. G).

And the submitted documents, titled:

Marketing Report (August 2021), Marketing Evidence (13-12-21), Marketing Evidence (20-07-22), Student Accommodation Needs (August 2021), Phase 1 Geoenvironmental Desk Study (June 2021), Archaeological Desk-Based Assessment (June 2021), Air Quality Assessment (July 2021), Travel Plan Statement (May 2022), Transport Statement (May 2022), Planning Statement (May 2022), Car Parking Survey (05-04-22) (Ref: VRP1391-01), Daylight and Sunlight Report (June 2022), Daylight and Sunlight Supplementary Statement No. 2 (September 2022), Design and Access Statement (Rev. L) (24-03-2024), Updated Noise Assessment (Ref: 20/0043/R1) (Rev. 1) (January 2022), Draft Fire Statement Form (10-06-22), Viability Report (January 2024), Planning and Affordable Housing Statement (April 2024).

5.10 The proposed wording for Condition 2 is as follows:

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

02-91-100, 02-91-102, 02-91-103, 02-91-104, 02-91-105, 02-91-106, 02-02-101 (Rev. K), 02-03-100 (Rev. R), 02-03-101 (Rev. P), 02-03-102 (Rev. N), 02-03-103 (Rev. R), 02-03-104 (Rev. R), 02-03-105 (Rev. M), 02-02-111 (Rev. D), 02-04-101 (Rev. D), 02-04-102 (Rev. D), 02-05-101 (Rev. M), 02-05-102 (Rev. L), 02-05-103 (Rev. L), 02-05-104 (Rev. L), 02-05-105 (Rev. L), and 02-05-106 (Rev. L).

And the submitted documents, titled:

Marketing Report (August 2021), Marketing Evidence (13-12-21), Marketing Evidence (20-07-22), Student Accommodation Needs (August 2021), Phase 1 Geoenvironmental Desk Study (June 2021), Archaeological Desk-Based Assessment (February 2021), Air Quality Assessment (May 2026), Travel Plan Statement (April 2026), Transport Statement (April 2026), Planning Statement (May 2022), Car Parking Survey (05-04-22) (Ref: VRP1391-01), Daylight and Sunlight Report (April 2026), Daylight and Sunlight Supplementary Statement No. 2 (September 2022), Design and Access Statement (Rev. P) (08-01-2026), Noise Break-In Assessment (April 2026), Draft Fire Statement Form (10-06-22).

6. Planning Policy

6.1 This section of the Planning Statement provides an overview of the key planning policies and other material considerations relevant to the proposals that are the subject of this planning application.

National Planning Policy Framework

6.2 The National Planning Policy Framework (NPPF) (2024) sets out the Government's planning policies for England and how these should be applied.

6.3 The Framework provides overarching support for the development of sustainable, previously developed sites like this one for housing.

The Development Plan

6.4 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 requires that, when making a determination under the Planning Acts, that determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.

6.5 The Development Plan for London Borough of Hillingdon comprises the following documents:

- London Plan (2021)
- Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
- Hillingdon Local Plan: Part 2 – Development Management Policies (2020)
- Hillingdon Local Plan Part 2 – Site Allocations and Designations (2020)

6.6 Policy H15 of the London Plan, together with the Mayor's London Plan Guidance (LPG): Purpose-Built Student Accommodation (2024), supports the delivery of PBSA where it responds to identified need, is secured for occupation by students, and contributes towards the creation of mixed and inclusive communities. The Guidance recognises the important role that PBSA plays in meeting housing need, both directly through the provision of dedicated student accommodation and indirectly by reducing pressure on the private rented sector and the wider housing stock, including family housing.

Article 4 Direction relating to small HMO's in Hillingdon

6.7 In December 2025, London Borough of Hillingdon introduced a new Article 4 Direction removing permitted development rights for the conversion of family homes into small HMOs accommodating between three and six occupants without planning permission. As a result, planning permission is now required for any change of use to an HMO, regardless of size.

6.8 Planning permission had already been required for large HMOs accommodating more than six occupants, and existing Article 4 Directions relating to small HMOs were already in place within the Brunel and Uxbridge South Wards. However, the new Direction extends these controls across the Borough.

6.9 The Article 4 Direction was introduced in response to concerns regarding the over-concentration of HMOs within Hillingdon, which have historically provided a popular form of accommodation for students across the Borough.

6.10 The introduction of the Article 4 Direction is therefore particularly relevant to the proposed scheme, as it demonstrates the need for PBSA within the Borough to ensure that student housing needs continue to be met, particularly given the likely reduction in HMOs available for student occupation.

7. Planning Considerations

7.1 This section assesses the minor material amendments in light of the relevant Development Plan policies. The key planning considerations comprise the Design and Quality of housing.

Design

7.2 The proposed revisions to the approved scheme are minor in nature and would not materially alter the overall design approach of the development. The external amendments comprise the addition of a single-storey rear projection measuring approximately 8 sqm, revisions to the external amenity space, and minor alterations to the fenestration strategy.

7.3 Internally, the proposals seek to increase the number of student accommodation units from 61 to 73 within a broadly comparable gross internal floor area. This has been achieved through a modest reduction in the average studio size. Amendments have also been made to the ground floor layout to provide an enhanced communal amenity space with direct access to, and overlooking, the rear external amenity area.

7.4 Taken together, the proposed internal and external amendments are considered to result in no material harm to the appearance of the development or to its relationship with the character and appearance of the surrounding area. The proposals would therefore maintain the high-quality design approach established under the extant permission.

7.5 Neither the London Plan, the Mayor's *London Plan Guidance: Purpose-Built Student Accommodation* ("LPG-PBSA"), nor the Hillingdon Local Plan prescribe specific minimum space standards for PBSA developments. As set out in further detail within the submitted Design and Access Statement (Rev. P), the proposed accommodation standards have therefore been informed through a combination of market analysis and reference to Camden Council's established methodology for assessing PBSA room sizes.

7.6 Camden Council's approach derives PBSA space standards from established HMO standards, with additional allowances incorporated for study space, kitchen facilities, and en-suite bathroom provision. These allowances comprise:

- 1 sqm for a desk and chair;
- 3 sqm for kitchen facilities; and
- 2.5 sqm for a shower room comprising a WC, basin, and shower.

7.7 These principles have been applied alongside Hillingdon Council's *Minimum Standards for Houses in Multiple Occupation within the London Borough of Hillingdon*, which identifies minimum room sizes of 6.51 sqm for a single bedroom and 10.2 sqm for a double bedroom.

7.8 Applying the additional PBSA allowances identified above results in indicative PBSA room size benchmarks of 13.01 sqm for a single occupancy studio and 19.7 sqm for a double occupancy studio.

7.9 In addition, market research has been undertaken examining comparable consented PBSA developments across London, which identified average studio sizes typically ranging between approximately 12 sqm and 25 sqm.

7.10 The proposed average unit size of 16.1 sqm therefore sits comfortably within both the benchmark standards and the wider market evidence set out within the Design and Access Statement. Furthermore, as referenced previously within this Planning Statement, the proposed average room size has been accepted by the Council through the pre-application process.

- 7.11 The level of communal amenity provision associated with the proposed uplift in unit numbers has also been reviewed and accepted by the Council. Analysis of comparable consented PBSA schemes in London identified communal amenity provision typically ranging between 0.6 sqm and 1.8 sqm per bed space. In addition to the internal communal facilities proposed, the scheme would provide approximately 166 sqm of high-quality external amenity space, equating to approximately 2.27 sqm per room, thereby ensuring an appropriate level of amenity provision for future occupants.
- 7.12 The proposed development would therefore continue to deliver a high-quality design outcome in accordance with Policies D2, D3, D4, D5, and D6 of the London Plan (2021), together with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

Affordable Housing

- 7.13 The provision of affordable PBSA accommodation at the site has been the subject of extensive discussions between the Applicant and the Council, informed throughout by detailed viability assessments undertaken by the respective viability consultants acting on behalf of each party.
- 7.14 The original planning permission for the redevelopment of the site to provide PBSA (ref. 1058/APP/2021/3423) secured a policy-compliant level of affordable student accommodation, requiring 22 of the approved 61 units (36%) to be delivered as affordable PBSA through the associated Section 106 Agreement. The viability of this requirement was subsequently challenged by the Applicant through application ref. 1058/APP/2024/1013 and, thereafter, through Appeal ref. APP/R5510/W/25/3360212.
- 7.15 In determining the appeal, the Inspector concluded that a reduced affordable PBSA provision of 20%, equating to 12 affordable units within the approved 61-unit scheme, represented an appropriate and viable balance having regard to the evidence submitted by both the Appellant and the Council.
- 7.16 As set out previously within this Planning Statement, the Council has subsequently agreed that this proportion of affordable provision may be retained in relation to the proposed revised scheme, subject to commencement of development within 12 months of the date of any planning permission.
- 7.17 Accordingly, this Section 73 application proposes the delivery of 73 PBSA units at the Paddington Packet Boat site, of which 20% would be provided as affordable PBSA accommodation. This equates to a total of 15 affordable student units.
- 7.18 Whilst this represents a departure from the policy-compliant level of affordable provision, the agreed position has been informed by extensive viability evidence and detailed negotiations between the Applicant and the Council. The Applicant is committed to progressing the development within the agreed timeframe to ensure that the proposed affordable housing provision can be secured in accordance with the agreed approach.

8. The Planning Balance and Conclusion

- 8.1 This application has been submitted pursuant to Section 73 of the Town and Country Planning Act 1990 seeking consent for a series of minor material amendments to the approved development at the site. The proposals seek to increase the PBSA provision from 61 to 73 student accommodation units, of which 20% (equating to 15 units) would be secured as affordable PBSA accommodation.
- 8.2 The amendments proposed through this Section 73 application represent a logical and proportionate evolution of the extant consented scheme. The revisions have been carefully considered and are limited in scope and would not materially alter the approved design principles, scale, massing, or overall visual appearance of the development, ensuring that the high-quality design approach established under the existing permission is retained.
- 8.3 The proposed uplift in student accommodation from 61 to 73 units would make a meaningful contribution towards identified PBSA need within Greater London and, more specifically, within the London Borough of Hillingdon. The proposed average studio size remains comfortably within the range evidenced through both market analysis and recognised assessment methodologies, whilst the scheme would continue to provide a high standard of communal and external amenity provision for future occupiers.
- 8.4 The delivery of 73 student accommodation units would also contribute towards meeting wider housing needs within the Borough. Based on the commonly applied 2.5:1 ratio, the proposals would equate to approximately 29 net additional conventional dwellings, thereby assisting in reducing pressure on the wider private rented sector. This is of particular relevance in light of the recently adopted Article 4 Direction relating to small HMOs within Hillingdon.
- 8.5 In relation to affordable housing provision, whilst the proposed 20% affordable PBSA offer falls below the policy-compliant target, this position has been comprehensively tested through detailed viability evidence and extensive engagement between the Applicant, the Council, and both parties' respective viability consultants. The agreed position reflects the conclusions previously reached by the Planning Inspector through the appeal process and has now again been accepted by the Council through the pre-application discussions associated with this Section 73 submission.
- 8.6 On balance, the proposed amendments are considered to accord with the objectives of the London Plan (2021), the Mayor's London Plan Guidance on Purpose-Built Student Accommodation, and the Hillingdon Local Plan Part 2 (2020). The proposals would deliver clear public benefits through the increased provision of student accommodation and affordable PBSA on a sustainable brownfield site, without giving rise to any material adverse impacts.
- 8.7 Accordingly, the proposed development is considered to represent sustainable development for which planning permission should be granted without delay.

Nexus Planning

London
Holmes House
4 Pear Place
London, SE1 8BT

T 020 7261 4340

nexusplanning.co.uk