PROGRESS PLANNING

Frays Court, 71-73 Cowley Road, Uxbridge, UB8 2AE

Planning, Transport, Design and Access Statement

Prepared by Progress Planning on behalf of:

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Introduction

This statement has been prepared to support a planning application for erection of a single storey roof extension to provide 5 residential flats. These units will be studios and will be completed as part of the overall conversion of the existing building from office to residential which has been approved and subject to a new prior approval application to secure 23 residential flats. In total, the final residential building would comprise 28 units consisting of 10 studios and 18 x 1 bedroom flats. For clarity, this application is only seeking planning permission for the additional 5 studio fats at third floor level. However, this application has been submitted alongside the prior approval application for the conversion of the existing building.

Executive Summary

In terms of principle of development, an extant prior approval application establishes the residential use of the site and it is considered that providing an additional storey to deliver 5 more residential units at this highly accessible location next to the Metropolitan Town Centre would make the most efficient use of the building. Given local, regional and national planning policies are supportive of increasing housing supply, the principle of development is considered acceptable.

The proposal would result in relatively modest changes to the appearance of the building. Extending by 1 storey part of the roof in a style and finish in keeping with the character of the building and appearance of the surrounding area. Given the scale and nature of the proposed changes, the development would not cause any harm to the residential amenity of neighbouring properties or those within the rest of the building.

The quality of the proposed accommodation exceeds national and regional planning policy in terms of internal space, access to daylight and outlook, and the units would offer future occupiers good quality living accommodation.

Subject to a legal agreement to restrict access to parking permits for future occupiers, the proposal would not cause any parking concerns given there are parking restrictions on surrounding roads and it is located within a Metropolitan Town Centre with access to good public transport. In addition, adequate cycle parking is available at lower ground floor level which will encourage the occupiers to use alternative, green modes of transport.

Overall, the development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of local Council policy.

The Site

The existing building was constructed in the 1980s and is currently used as an office building. It is a red bricked detached building that comprises a lower ground floor containing parking and refuse storage, and 3 storeys of office above. The site has access directly from Cowley Road and is situated next to a bus stop. The site is located on the eastern side of Cowley Road, between it and the River Frays from which it takes its name. Immediately to the southwest there is a pedestrian bridge leading to Austin Waye and Rockingham Recreation Ground. The building is located approximately 300m from Uxbridge Town Centre, 450m from Uxbridge Underground Station and 50m from Rockingham Recreational Ground. The site has a PTAL rating of 4 and is located in a Controlled Parking Zone. The River Frays and its embankment is in Flood Zone 3 and parts of Cowley Road suffer from surface water drainage issues. Cowley Road is one of the main arterial routes into Uxbridge Town Centre and

the building is situated at the entrance to the town when travelling into it from West Drayton / Yiewsley.

Proposed Development

The proposal is for erection of a single storey roof extension to accommodate 5 residential flats. The aim would be to deliver these alongside the flats secured under prior approval for the change of use. A prior approval application has been submitted with this application to secure 23 flats to replace the already consented 19 unit scheme.

Planning History

The existing building was constructed in the 1980s and is currently used as an office building. It was approved under application ref: 130304/UB/1375. Prior Approval Application 13010/APP/2020/1006 secured consent for 19 residential units on the site in early 2020. A new prior approval application submitted alongside this application seeks to re-arrange the internal floor layouts to provide an additional 4 units. The re-arrangement and changes to the layout of the flats sought under the prior approval application has changed by virtue of concerns over the economic impact of the current coronavirus.

Policy Context

The proposed development would be assessed against the Development Plan Policies contained within the Hillingdon Local Plan, the London Plan, the NPPF and supplementary planning guidance by both the London Borough of Hillingdon and GLA.

Principle of Development

The existing building is currently used as an office, however, prior approval ref: 13010/APP/2020/1006 has already established the residential use of the building and there is an application alongside this proposal to convert the building to residential. It is our intention to ultimately deliver 28 units on this site (23 under the current prior approval application and 5 more in this application). In terms of principle of development, it is considered that providing an additional storey to deliver 5 more residential units at this highly accessible location next to the Metropolitan Town Centre would make the most efficient use of the building. Given local, regional and national planning policies are supportive of increasing housing supply, the principle of development is considered acceptable. It is recognised that the Council may only accept this residential development coming forward subject to the complete change of use of the rest of the building under the prior approval. Therefore, although under normal circumstances a condition tying this development to another application would be most likely unreasonable, the client would be satisfied to have such a condition imposed to give the Council comfort, subject to agreeing an appropriately worded condition.

Policy H1 (Housing Growth) of the Hillingdon Local Plan: Plan 1 – Strategic Policies (2012) requires that the borough meets and exceed its minimum strategic dwelling requirement in accordance with other Local Plan policies.

Policy 3.3 (Increasing Housing Supply) of the London Plan provides explicit strategic support for the provision of housing in London.

As mentioned above, In terms of principle of development, it is considered that providing 5 additional residential units on this site next to Uxbridge Town centre and

along a main arterial route would make the most efficient use of the building, in accordance with strategic policy H1 of the Local Plan: Part 1 – Strategic Policies (2012); policy 3.3 (Increasing Housing Supply) of the London Plan; and the National Planning Policy Framework.

Impact on the character and appearance of the area

Strategic Policy S01 of the Local Plan: Part 1 seeks to conserve and enhance the borough's heritage assets and their setting by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage assets, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

Chapter 7 of the London Plan sets out a series of overarching design principles for development in London and policy 7.6 seeks to promote world class, high quality design and design led change in key locations.

The application property is neither listed nor located within a conservation area. The proposal only seeks to add an additional storey on part of the building situated away from neighbouring properties. The additional storey would be integrated sympathetically into the existing design of the building and it would be given a new roof that would match its character and appearance. The additional storey is not considered to significantly change the character of this detached building. The addition would be situated on the building in a way that would not make it appear bulky or dominant.

It is worth mentioning that Progress Planning secured consent for a similar development (an extra residential floor to an office block) in Uxbridge recently and this has been completed at Lovell House, immediately next door to the Council's Civic Centre. Feedback on this site was that you would have never have known that an additional storey had been added because it had been blended in so successfully. This was in a Conservation Area and next to a Listed Building which was a more sensitive location. Nonetheless, the positioning of the application property affords the opportunity to add some modest height without appearing excessive in the streetscene. The resulting height of the building would not appear out of keeping with the streetscene given its corner like positioning at the southern end of the row of properties leading up to the entrance of the town centre.

Similar to the proposal at Lovell House, the material palette and its design will reflect the surrounding context; the proposed matching brick will aid in softening the height, and be similar to that on the original building and neighbouring properties, integrating the development into its setting.

Overall, it is considered that the scheme will introduce a built form that is appropriate to its setting and in keeping with the townscape character of the area, in accordance with policies SO1 and BE1 of the Local Plan: Part 1, policies 7.4, 7.6, 7.8, and 7.9 of the London Plan; and the National Planning Policy Framework.

Impact on neighbouring properties

The building is located on an arterial route leading into Uxbridge Metropolitan Town Centre. The proposal would not extend the building nearer to any neighbouring properties. There are no neighbouring residential properties that would be impacted by the proposal. Therefore, the amenity of occupiers within neighbouring properties is considered to be safeguarded.

Living conditions for future occupiers

The Government's national space standards contained in the Technical Housing Standards and policy 3.5 of the London Plan set out the minimum floor areas required for proposed residential units in order to ensure that they provide an adequate standard of living for future occupiers.

The proposal is for 5 studio flats which would require a minimum of 37 sqm each. The proposed flats would measure 42 sqm, 43 sqm, 46.2 sqm, 46.7 sqm, and 47.8 sqm. Therefore, the development would exceed the minimum internal space standards of policy 3.5 of the London Plan by between 5-10.8 sqm for each flat. All habitable rooms have access to adequate outlook and daylight. In addition, none of the residential units are solely north facing, so all habitable spaces benefit from direct sunlight for at least part of each day.

Part of the reason for the excess floorspace to each unit is to compensate for the lack of private external amenity space. The level of excess internal amenity space for each flat would exceed the required level of private amenity space as set out in the Mayor's Housing SPG. In addition, as these are all studio apartments and therefore non family sized units, it is more likely that individuals and young professionals would occupy the dwellings negating some of the need for immediate on the door step private amenity space. Also, the building is located approximately 50m from Rockingham Recreational Ground which provides a wide multipurpose outdoor space that could be used by future occupiers. Overall and given the oversized nature of the studio flats, it is considered that the proposed accommodation is considered to be of a reasonable standard to the benefit of future occupiers.

Transport Considerations

DMT1 Managing Transport Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

DMT2 Highways Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals must ensure that safe and efficient access to the highway network is provided; the proposal does not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; safe and convenient facilities for pedestrians and cyclists are provided; impact on local amenity and congestions are minimised by routing through traffic by the most direct means; there is suitable mitigation measures to address any traffic impacts.

DMT6 Vehicle Parking of Hillingdon's Local Plan: Part 2 – Development Management Policies sets the local parking standards required for development.

Policy 6.9 'Cycling' of the London Plan sets minimum standard for cycle parking.

Policy 6.13 ‘Parking’ of the London Plan sets maximum standards laid out in Table 6.2 in the parking addendum. In addition, developments must:

- Provide parking for disabled people
- Meet the minimum cycle parking standards set out in Table 6.3
- Provide for the needs of businesses for delivery and servicing

Policy 6.3 'Assessing effects of development on transport capacity' of the London Plan states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

Policy T6.1 Residential parking of the emerging London Plan sets maximum standards and stipulates that the maximum level of parking for residential development in PTAL 4 in outer London is up to 0.5 parking spaces per unit.

The site benefits from an existing access point and parking court at lower ground floor level which will not be changing for this proposal. The existing access and layout is not considered to raise any highway safety concerns.



Image of existing undercroft / access / parking

The proposal seeks 5 additional studio flats. The aim is to deliver these units as part of the overall conversion of the building to residential that is being secured via prior approval. Ultimately it is anticipated that the building would incorporate 28 units comprising 10 studios and 18 x 1 bedroom units. The building would accommodate 20 car parking spaces of which 2 would be disabled bays. This equates to a parking ratio of 0.71 spaces per unit. As mentioned above, this would be significantly above the maximum standard set out in the Intend to Publish London Plan where it stipulates that for residential development in outer London with a PTAL rating of 4, no more than 0.5 parking spaces should be provided. However, the Council’s standard differs to the emerging London Plan and recommends a maximum of 0.5 for studios but 1 for each 1 bedroom unit. For the total of 28 units (combining the requirement under the pending prior approval and subject application), a maximum limit for 10 studios and 18 x 1 bedroom units would be 23 spaces for the development in contrast to 14 car parking space set out by the London Plan. Given that the development comprises only studios and 1 bedroom units; is positioned immediately beside a bus stop, is located within 400m of Uxbridge tube station and the Metropolitan Town Centre, the level of car parking being provided is considered reasonable for the development. As there are parking controls in the surrounding area, a S106 could restrict access for future occupiers from obtaining parking permits which would ensure there were no overspill car parking. On this basis, the balance of car parking provision is considered acceptable.

It is worth mentioning that the development would provide 33 cycle parking spaces for the occupants of the development which would also encourage green modes of transport. This level is in accordance with Hillingdon's Local Plan policy for cycle parking and they would all be secured, sheltered, and accessible.

In terms of refuse servicing, the building would continue to be serviced from the front of the site. Refuse/recycling would be stored at lower ground level for the ease of future occupiers.

The refuse store would be accessible to residents and to collection vehicles as per the existing arrangements for the office and for the previously approved residential development which will be delivered as part of the redevelopment of the site.

Given that the general servicing arrangements for the site would remain similar to existing, it is considered that the proposal will not raise any transport or highway safety issues with regards to refuse/recycling.

Overall in transport terms, the development is considered to comply with policies DMT1, DMT2, and DMT6 of the Hillingdon's Local Plan: Part 2 – Development Management Policies; policies 6.3, 6.9 and 6.13 of the London Plan and policy T6.1 of the emerging London Plan.

Contamination

There are no known contamination risks on the site and the previous uses and adjacent uses are not considered to give rise to any such risks. Given the nature of the development there is considered to be limited risk of contamination to future occupiers. In addition, the proposal would not involve any ground works. Therefore, it is not anticipated that further details would be necessary to gain prior approval.

Flooding

The majority of the site is located within Flood Zone 1. However, the bank along the Fray's River is located in Flood Zone 3 (See Environment Agency Map below). There are also parts of Cowley Road that suffers from surface water flooding.

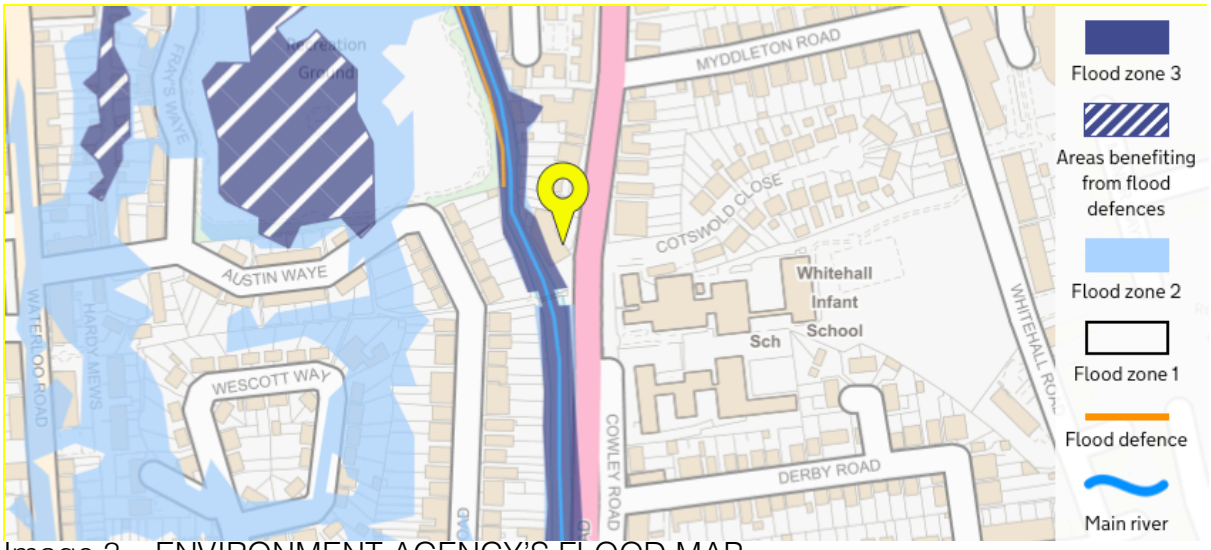


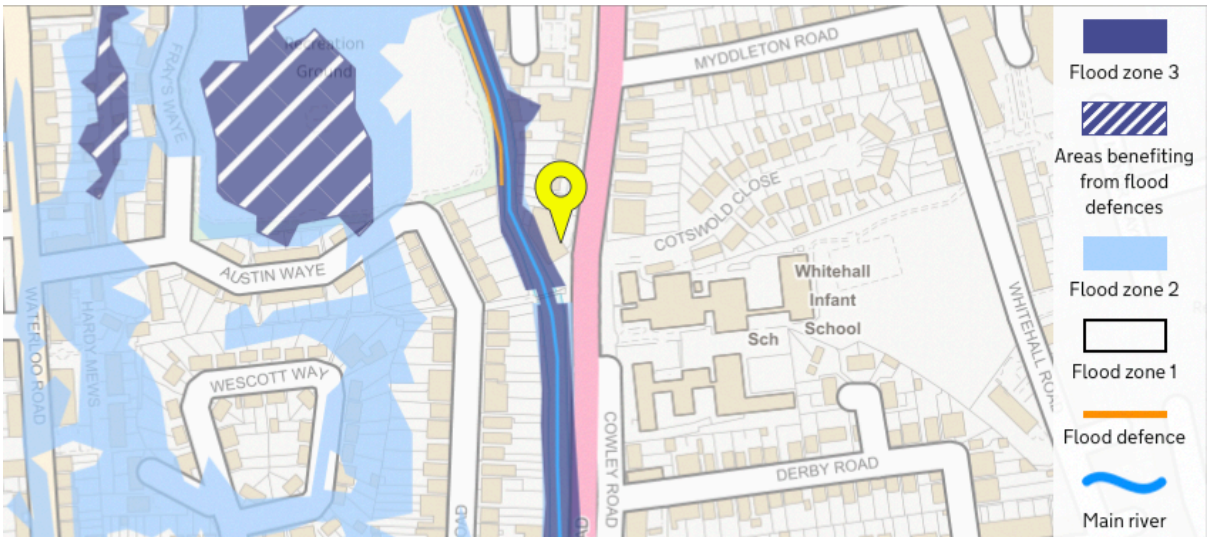
Image 3 – ENVIRONMENT AGENCY'S FLOOD MAP

A formal pre-application was lodged with Hillingdon Council to address concerns regarding flooding. At the meeting, the Local Flood Officer requested a detailed topographical survey of the road in order to better understand the issues. The TOPO found that the entrance to the site on Cowley Road is 31.93 AOD. Cowley Road falls from North to South towards Derby Road before rising gently towards Walford Road.

The lowest point on Cowley Road is approximately 190m South of the site and has an elevation of 31.38m AOD. This is 550mm lower than the entrance to the application site. The grass verge rises up from Cowley Road by 150mm to 400mm. The lowest point on the embankment of the river is 31.70m AOD, this is 230mm lower than the site access. For further details, the Topographical Survey is included in Appendix A of the submitted FRA. However, the survey makes clear that any surface water flooding on Cowley Road would flow over the top of the grass embankment between the road and the river before it reaches the development site. Therefore, the risk from surface water flooding is very low.

Also, the Flood Risk Assessment demonstrates that a safe, dry access will be available to and from the site at all times during a flood event and a flood management and evacuation plan will be issued to all residents to inform them of procedures to be followed during a flooding incident.

The FRA has assessed the impact of climate change on flood levels and it has proved that even when the highest climate change allowance is factored in the site would still be free from flooding.



The Flood Risk Assessment by Lanmor Consulting concludes that the proposed site is suitable for development, as there will be no negative impact on the flood plain, flow paths or flood storage volumes, the development will be safe from flooding and a dry access can be provided to and from the property at all times. Nevertheless, it is recognised that farther to the South, Cowley Road does suffer from surface water issues and this proposal could aid in improving the risk of flooding for those neighbouring properties where it causes a greater issue. Therefore, at pre-application, the Local Flood Officer suggested a financial contribution to make drainage improvements to the public highway land comprising the grass embankment between the road and river. It was discussed and agreed that the applicant would contribute £28,000 towards provision of rain gardens or associated improvements to this section of the road to improve surface water flooding more widely beyond the application site. This financial contribution is being secured under the prior approval application that is for the same site. For more details of how the

wider regeneration addresses flooding and will improves surface water drainage in the wider area, please refer to the Flood Risk Assessment prepared by Lanmor Consulting.

Noise

The building is located on Cowley Road, which is a main road leading into Uxbridge town centre. However, the area is characterised by residential development and there are no commercial premises immediately adjacent to the building. Therefore, noise from commercial premises should not represent an issue for the proposed development.

In addition, it should be noted that the development would need to comply with Approved Document E 'Resistance to the passage of sound' of Building Regulations (2015 Edition) which would safeguard future occupiers from adverse levels of noise.

Notwithstanding, if considered necessary by the Council's Environmental Health Team, a condition to ensure that the residential accommodation met an acceptable noise criterion could be imposed.

Summary

An extant prior approval application establishes the residential use of the site and it is considered that providing an additional storey to deliver 5 more residential units at this highly accessible location next to the Metropolitan Town Centre would make the most efficient use of the building. Given local, regional and national planning policies are supportive of increasing housing supply, the principle of development is considered acceptable.

The proposal would result in relatively modest changes to the appearance of the building. Extending by 1 storey part of the roof in a style and finish that would be in keeping with the character of the building and appearance of the surrounding area. Given the scale and nature of the proposed changes, the development would not cause any harm to the residential amenity of neighbouring properties or those within the rest of the building.

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