

# Fuller Long

13th October 2023

Planning Department  
Hillingdon Council

Dear Sir/Madam

## Application for Full Planning Consent at Hillingdon Civic Centre, High Street, Uxbridge, UB8 9ST

This planning letter is written in support of a full planning and Listed building application on behalf of Ameresco. The application seeks consent for the installation of renewable energy technologies at the site, further details of which are set out in the proposals section.

The application is located within the London Borough of Hillingdon. The proposals put forward seek to respond to Hillingdon's strategic climate action plan that aims to be carbon neutral by 2030. They seek to improve the energy performance of the complex and replace council assets that are now at the end of their usable lives i.e boilers and calorifiers. The proposals will therefore secure longevity, as well as to assist the Council in meeting its climate change targets.

This planning letter will set out the proposal, as well as an assessment of the scheme against national and local planning policy. It should also be read in conjunction with the accompanying suite of application drawings and Heritage Statement.

### Site and Surrounds

Hillingdon Civic Centre is a municipal building and the headquarters of Hillingdon London Borough Council. It is located in Uxbridge Town Centre and is set within a large plot. An aerial image of the site's location is provided below (Image 1.).

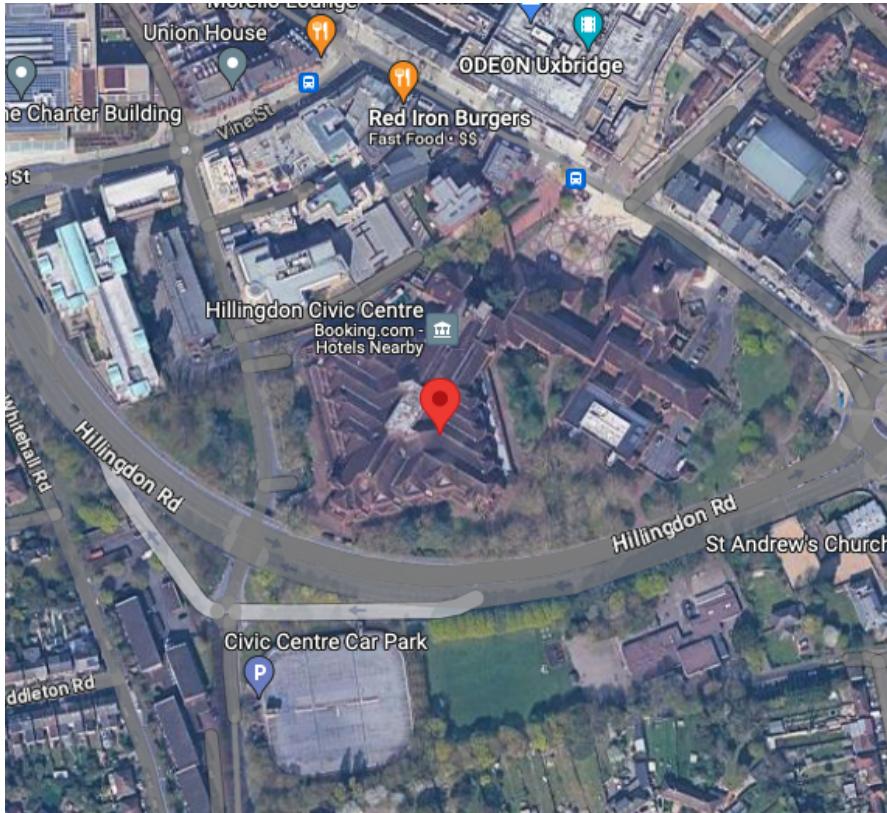


Image 1. Site Location

# Fuller Long

The property is Grade II listed. Images of its exterior are provided below (Image 2 and 3).



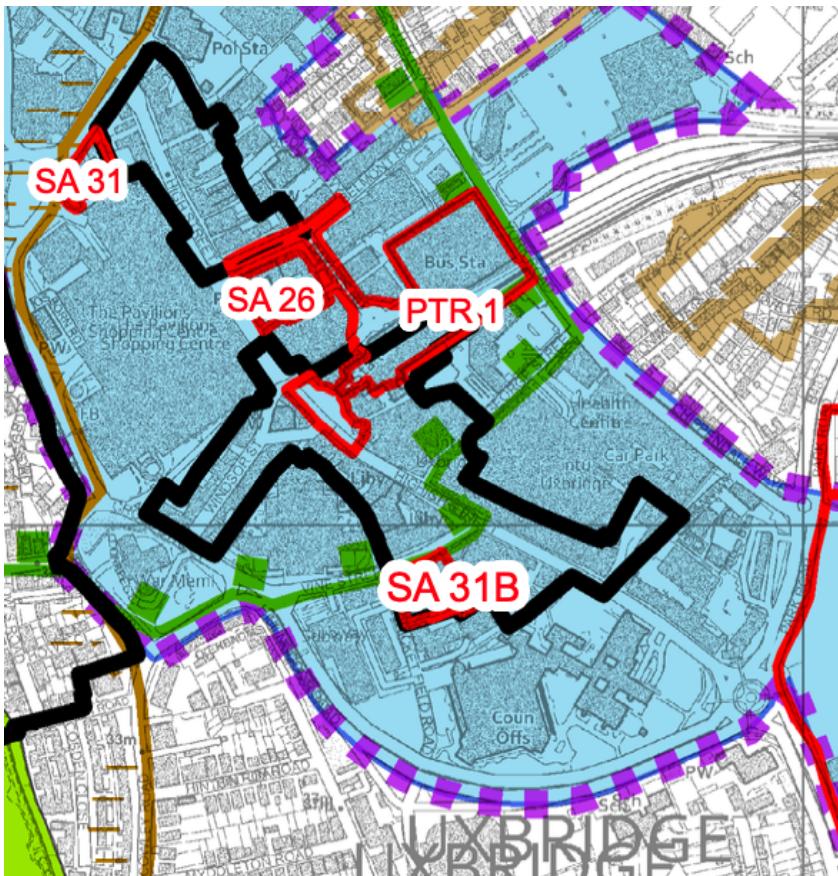
**Images 2 and 3. Exterior of Hillingdon Civic Centre**

An extract from the Council's planning policy map is included below. It confirms that the site is subject to the following designations:

- Within a Town Centre

# Fuller Long

- Within a Hotel and Office Growth Location
- adjacent to a Conservation Area



**Image 4. Extract from Council's policy map**

## Planning History

A planning application and Listed building consent (references 14805/APP/2023/2336 and 14805/APP/2023/2337) have been submitted by the Council for the replacement of a failed flat roof covering (behind parapet walls); replacement of defective pv panels on a like-for-like basis. Joinery, brickwork and concrete repairs; the replacement of single glazed Crittall windows with double glazed Crittall windows. Installation of internal secondary glazing and, the removal of a suspended ceiling within the function suite, all within the Middlesex Suite. Application references. These applications are still under consideration.

## Proposal

The proposals involve the following

- Two Air Source Heat Pumps (ASHPs) on the cooling tower roof (1.5m (w) x 10.2m (l) x 2.5m (h))
- One ASHP being 1.5m (w) x 5.4m (w) x 2.5m (h) on the chimney roof with one thermal buffer.
- Four ASHPS within the service yard (2 being 1.5m \*w) x 10.2 (l) x 2.5m (h) and 2 being 1.5m(w) x 7.8m (l) x 2.5m (h) surrounded by a 2.1, red metal louvre fencing and one thermal buffer.

- Replacement of existing timber beams and roof covering of the cooling tower roof. Nine new steel beams will be installed to reinforce the existing steel frame in the plant room beneath the roof to provide the extra additional load capacity to support the weight of the ASHPs.

- On the chimney roof, the paving slabs and stilts will be removed to offset the load of the ASHP and thermal buffer on the supporting roof structure.

In addition, it is proposed to install cavity wall insulation and secondary glazing throughout the building. These aspects do not need planning consent but are subject to listed building consent. As such, further details of these parts of the proposals are included within the accompanying heritage statement.

## Planning Policy Context

The Development Plan for the London Borough of Hillingdon comprises:

- The London Plan (2021);
- The Hillingdon Local Plan Part 1 - Strategic Policies (2012); and
- The Local Plan Part 2 - Development Management Policies, Site Allocations and Designations (2020).

Other material considerations include:

- National Planning Policy Framework (2021); and
- National Planning Policy Guidance (2021).

The most relevant planning policies are outlined below.

### The London Plan

**Policy E1** states that improvements to the quality, flexibility and adaptability of offices should be supported through refurbishment. **Policy E2** further states that the development of B use classes should ensure that the space is fit for purpose.

With regards to cultural facilities and creative industries (including theatres) **Policy HC5** confirms that existing facilities and venues should be protected. The subtext to the policy recognises the economic and social benefits that such facilities provide for the capital, and the opportunities they provide for Londoners.

Chapter 9 of the London Plan relates specifically to sustainable infrastructure and reducing emissions and creating sustainable developments.

### Local Plan Part 1

**Policy EM1** of the Local Plan Part 1 has the aim of reducing climate change. It states that the Council will work with developers to provide efficiency initiatives and it further states that they will promote decentralised energy. The Council also confirms through this policy that they will encourage the installation of renewable energy.

The site is located within Uxbridge Town Centre and the Council have noted a desire to strengthen this centre through **Policy E4**. The policy states that the town centre is an appropriate location for a mix of uses, including retail, offices, hotels and recreation and leisure.

**Policy HE1** relates to the heritage of Hillingdon. It states that heritage assets will be conserved and enhanced. It also notes that the modification of heritage assets may be acceptable when considering proposals to mitigate or adapt to the effects of climate change.

### Local Plan Part 2

With regards to Heritage, **Policy DMHB 1** states that the Council will expect development proposals to avoid harm to the historic environment. It states specifically that:

"Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset".

**Policy DMHB 2** relates specifically to listed buildings. It confirms that permission will not be granted for proposals which are considered to be detrimental to the setting of the asset. It also requires a Heritage Statement to be submitted with any application for a listed building, demonstrating an understanding of the importance of the building and the impact of the proposals on its significance.

The design of new development is guided by **Policy DMHB 11**. It expects all development, including extensions and alterations to existing buildings, to be of the highest standard and incorporate principles of good design. Good design will take account of the local character and context and use high quality building materials and finishes.

### Planning Consideration

An assessment of the proposals against planning policy is provided below.

#### Principle of Development

The building which is the subject of this application provides the headquarters of Hillingdon Borough Council and is in a prime location. It is of significant importance to the running of the Borough and houses many important departments and personnel.

The building is a large Grade II listed property and there are high costs associated with the running of such a facility. The proposals put forward will help to reduce these running costs by increasing the amount of electricity that can be generated on site, as well as by improving the efficiency of heating and cooling systems.

National planning policy places a strong emphasis on protecting existing office space and Uxbridge is recognised in local policy as an important Town Centre where the provision of office space is critical to its success.. Allowing the proposals within this application will enable improve the efficiency of the building and will help to safeguard it for the future. This is entirely in line with policy aims and therefore we contend that the principle of development is accepted.

#### Heritage and Design

The building which is subject of this application is Grade II listed. As such, the proposals have been developed with this in mind. A full heritage impact assessment of the proposals is provided within the accompanying heritage report.

#### **ASHPs**

##### Service yard

Four ASHPs are proposed in the service yard located to the northwest of the subject property which provides access to the building's main plant room at basement level. The AHSPs will be surrounded by a 2.1m louvred fence. Two pipes will run from the ASHP compound along the northeastern elevation wall of the service yard above the roller doors into the plant room.

To confirm the suitability of the location for the four ASHPs, plume modelling has been undertaken to assess the airflow around the units within the yard. Due to the enclosed nature of the area, it was identified that the cold air generated by the heat pumps would not be adequately dispersed away from the units, causing recirculation back into their air intake with the result that their efficiency and operational capability would be significantly reduced. This issue generally occurs in areas of low wind speed, which is the case with the service yard as it is surrounded on all sides by high walls which prevent an adequate circulation of air at floor level. As a consequence, cold air produced by the ASHPs will not be lifted above the surrounding walls and away from the heat pumps, causing inefficient thermal generation and uncomfortable working conditions in the yard area. It is therefore proposed to fit the ASHPs with chimney ducts, to channel the cold air exhausted from the heat pumps up and over the walls. The ducts will increase the height of the installation, but in line with conservation officer advice,

# Fuller Long

will be kept to 5.2m and will be coloured to match the bricks or plant room doors of the civic centre in order to lessen the visual impact of the ASHPs and the chimneys.

Whilst these works will introduce a relatively large structure to the side of the subject building these features will be located in an existing service area that is utilitarian in character and will not impact the significant facades of the building to the north, east and south. The installation will be visible from the footpath on the wall, but it will not detrimentally alter a view which is already formed by the operational needs of the building with loading doors, a steel fence surrounding the metal generator and an array of bins.

As part of the proposals, the existing bins will be relocated into a space within the basement car park and will no longer be visible at the exterior of the building.

The proposal will have no impact on the key architectural significance of the property but the installation of the ASHPs and cooling chimneys will impact the setting of the listed building. This will amount to a low level of less than substantial harm which will be offset by the generation of green thermal energy (space heating and hot water) when paired with onsite electricity generation through solar PV.

## Coolingtower roof

The proposed ASHPs will be partially visible when looking up to the roof from the garden area. However, they will be set back from the edge of the roof and so will be seen as part of the overall roofscape. The overall appearance of the building as seen from the garden comprises a collection of varying roof forms at each floor level. Given the height of the existing building and the view from close quarters within the garden, an additional horizontal feature above the flat roofline of the cooling tower will hardly be noticeable. The proposed ASHPS will therefore only have a minor impact on the significance of the listed building.

As part of these works, it is also proposed to replace the existing roof surface and to reinforce the existing roof steel frame with nine additional steel beams in order to increase the load capacity of the roof. A structural survey has revealed that some of the timber beams within the roof structure have rotted due to water ingress. The report also assessed that the proposed plant will introduce a load far in excess of the design imposed load for the roof. The proposed works will replace the timber joists and the cement/straw panel roof deck with gravel covering (which is also worn in some areas) with a new flat roof system . The existing steel framework will be retained and reinforced with nine new steel beams within the plant room. Nine additional steel frames above the roof surface to support the ASHPs and the thermal buffer will also be installed.

As outlined in the heritage report, whilst this will entail the removal of original fabric, the roof deck, timbers and gravel are not considered to contribute to the key significance of the listed building and their removal will have no impact on the significance of the property. The installation of two new steel beams to reinforce the existing steel frame is essential to take the load of the proposed ASHPs and thermal buffer. It will introduce a minor new structural feature within the plant room, but this will be located in a service area not visible from other areas of the building and will be clearly legible as a modern intervention. The steel frames on top of the roof will be viewed as part of the ASHP installation and will not be visible from ground level. The proposed works are therefore not considered to impact the architectural or aesthetic significance of the building.

## Chimney roof

To the north of the civic office building is a flat roof with two large chimney stacks which contribute to the aesthetics of the subject property. Whilst big, these stacks are only visible when viewing the Civic Centre from the north, across the main square to the entrance, and in glimpsed views looking north from Cricket Field Road. One ASHP and one thermal buffer are proposed in this location. The roof leads from a plant room to the south and is covered in paving slabs behind a 1m brick wall to the north and west and is behind the pitched roofs of the building to the east and south.

The proposed plant will be partially visible when looking south from the High Street and the conservation area, but it will be perceived to form part of the varied roof structure of the building and will not

compromise the key heritage significance of the property. The proposed ASHP is therefore considered to have a negligible impact on the significance of the listed building.

The structural survey assessed that the proposed plant will introduce a load far in excess of the design imposed load for the roof but recommended that the removal of the paving slabs, sleeper walls and mortar plinths that support the slabs would reduce the load on the existing roof structure, enabling the proposed ASHP and thermal buffer to be installed without further structural strengthening of the existing roof. The paving slabs are standard concrete slabs of no significance. It is not considered that they contribute to the significance of the building and their removal will have no impact on the building's special interest. The feet of the ASHP will sit directly on the roof surface. The buffer vessel will be mounted on a steel beam weight spreader that will also sit on the roof surface. Both mounts will be perceived as part of the installation and will not be visible from ground level. The proposed works are therefore not considered to impact the architectural or aesthetic significance

Local policies HE1 and DMHB 11 note the need to make modifications to existing heritage assets to adapt to climate change. As such, it is considered that the proposals will help to achieve this aim in the least visually intrusive way possible.

Overall the proposed ASHPs and the associated replacement roofs are considered to have a negligible impact to the significance of the listed building

## Sustainability

The key aim of the proposals is to increase the sustainability of the facility by incorporating sustainable energy techniques.

The air source heat pumps will allow the building to generate its own green thermal energy whilst the secondary glazing and cavity wall insulation will reduce the site energy consumption and improve its energy efficiency, allowing for smaller/fewer heat pumps to be required.

The proposals therefore meet the requirements of Policy EM1.

## Amenity

The air source heat pumps are set well within the site and would therefore not be detrimental to neighbouring amenity.

A noise report is submitted in support of the application which concludes little likelihood of noise from the proposed plant to the nearest noise sensitive receptor. The proposed plant meets the LPAs requirement that the plant is 5db below the background noise level at the nearest residential receptor.

As such, it is not considered that the proposal will have a negative impact on neighbouring amenity as a result of the scheme.

## Conclusions

This planning application seeks consent for the installation of renewable energy technologies at the Hillingdon Civic Centre in Uxbridge.

The proposals will help to achieve a more energy efficient facility which will consequently help to ensure the sustainability of the Centre and its continued operation into the future.

The proposals will not give rise to any negative impact in terms of amenity and will comply with the relevant Hillingdon planning policies

Protecting existing employment floorspace is a key national priority and the proposals will help to achieve this aim. It is therefore respectfully requested that planning permission is granted.

# Fuller Long

We look forward to hearing from you. .

Your sincerely

Clare Preece  
Planning Director

FullerLong