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Our Ref: 40341

Dear Sir/Madam

Application for Full Planning Permission for a Change of Use from Function Room to Public Library and Associated Internal Alterations at the Middlesex Suite, Hillingdon Civic Centre, High Street, Uxbridge, London UB8 1UW

We are instructed by our client, Hunters and Partners to prepare this Planning Statement to support an application for full planning permission in relation to the above proposals at the Middlesex Suite at London Borough of Hillingdon Civic Centre.

The application seeks permission for the change of use of part of the existing function room, with associated internal alterations, to support the relocation of the existing Uxbridge Library from the High Street into the now-redundant Middlesex Suite.

This Planning Statement should be read in conjunction with the following suite of architectural plans and technical consultant reports:

- The following architectural plans (prepared by Hunters):
 - Site Location Plan (drawing no. M9556-HUN-APL0001 Rev. A);
 - Level 1 – Existing Floor Plan (drawing no. M9556-APL0002 Rev. A);
 - Level 2 – Corporate Entrance Existing Floor Plan (drawing no. M9556-HUN-APL0003 Rev. A);
 - Level 2 – Middlesex Suite Existing Floor Plan (drawing no. M9556-HUN-APL0004 Rev. A);
 - Site Plan (drawing no. M9556-HUN-APL0005 Rev. A);
 - Level 1 -Proposed Floor Plan (drawing no. M9556-APL0006 Rev. B);
 - Level 2 – Entrance Proposed Floor Plan (drawing no. M9556-HUN-APL0007 Rev. B);
 - Level 2 – Library Proposed Plan (drawing no. M9556-HUN-APL0008 Rev. B);
 - Level 1 – Access Plan (drawing no. M9556-APL0009 Rev. C);
 - Level 2 – Access Plan (drawing no. M9556-HUN-APL-0010 Rev. B).
- Design and Access Statement (prepared by Hunters);
- Heritage Statement (prepared by Portico Heritage); and,

London

Birmingham

Bristol

Manchester

Reading

- Transport Statement (prepared by iTransport).

Site Description

The application site comprises the now redundant Middlesex Suite function room within London Borough of Hillingdon Civic Centre, a Grade II listed building situated on an irregularly shaped corner plot between High Street (north) and Hillingdon Road (east and south).

The Civic Centre is located within the Uxbridge Town Centre designation. It is not located within a Conservation Area, although the Old Uxbridge/Windsor Street Conservation Area is located to the north.

The building is Grade II listed for the following principal reasons:

- An early example of English Post-Modernism which creatively reinterprets the Arts and Crafts tradition An expressive composition of revivalist form and detail;
- Through its planning and elevational treatment the building's large mass is broken down into more intimate spaces and forms, offering a revised approach to civic architecture;
- The high level of craftsmanship, with a creative take on traditional brickwork detail, finely executed;
- Minimal external alterations, complete with extensive integrated hard landscaping.
- One of the first major works in England by a Modernist architect to embrace an overtly historicist aesthetic, marking the emergence of a new architectural zeitgeist.

The application is supported by a Heritage Statement prepared by Portico Heritage, which provides further details regarding the heritage value of the building and an assessment of the proposals in heritage terms. Following pre-application discussions with Council officers, it has been confirmed that as the interior is of no special historic or architectural interest, listed building consent is not required for the proposed works.

The Civic Centre building is accessed across a large square which opens up from the High Street. The main entrance is to the south of the square. Behind, the Council offices have a diamond-shaped footprint and a stepped profile of three and four storeys, set over a semi-basement car park. To the east of the square, connected behind the main entrance, is a second, more irregularly shaped part of the complex. This contains the Council Chamber, Civic Suite and Registry Office with parking beneath.

The existing floorspace at level 1 has been used partially as cellular office space and partially as a commercial catering kitchen. This existing arrangement is in itself the result of extensive internal alterations including the blocking up of wall openings and the addition of non-structural partitions albeit, as set out in the Heritage Statement, the interior of the building is not considered to be of historic interest.

Level 2 has been used as a function space for hire with a higher ceiling in the centre and smaller ancillary service, catering and w/c facilities associated with the function space. Again, this arrangement has been facilitated by extensive internal alterations comprising the erection of non-structural partitions and blocking up of wall openings..

Planning History

Planning permission and listed building consent were granted on 15 February 2024 (refs. 14805/APP/2023/3254 and 14805/APP/2023/3274) for: *'Alterations to the existing covered walkway (2nd level of the building) between the*

Corporate entrance and the Middlesex Suite to form a fully enclosed link by installing new windows and glazed screens. Formation of new entrance door (1st level of the building) to 1 North Quadrant.'

As such, planning permission and listed building consent has already been granted for the external works required to facilitate the proposed change of use and relocation of services.

Proposed Development

The proposals seek to remodel and change the use of part of the existing Middlesex Suite function room within the Civic Centre to a public library, which would facilitate the relocation of the library from its existing location on the High Street.

The relocated library will be provided on Level 2, incorporating the newly formed enclosed link space from the Corporate Reception. The proposals will better reveal the original internal composition of the building by reinstating the previously blocked up original openings in structural walls and the central, high ceiling will be revealed by removing the low-level suspended ceiling and opening up the previously blocked Crittall windows;

The library layout positions the bookshelves in the centre of the space, around which will be a series of clearly defined and legible ancillary spaces including a children's library, learning centre, tovertafel, study booths, computer areas, information point and a partitioned exhibition space. The library will also benefit from full w/c and changing places facilities.

As previously mentioned, planning permission and listed building consent have been granted for the external works required to facilitate the change of use. Therefore, this application seeks planning permission for the change of use and associated internal layout amendments only.

Planning Policy

The Development Plan for the London Borough of Hillingdon comprises the London Plan (2021), Hillingdon Local Plan Part 1 – Strategic Policies (2012) and the Hillingdon Local Plan Part 2 – Development Management Policies (2020). The National Planning Policy Framework (NPPF, 2023) is also a key material consideration.

NPPF (2023)

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

Paragraph 7 of the National Planning Policy Framework (NPPF, 2023) sets out that the purpose of the planning system is to achieve sustainable development. **Paragraph 8** identifies the three overarching social, environmental and economic objectives of sustainable development.

Paragraph 115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Section 12 of the NPPF focusses on achieving well-designed places. **Paragraph 131** sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process

should achieve and that good design is a key aspect of sustainable development. **Paragraph 135** goes on to state that planning policies and decisions should ensure that developments (inter alia):

- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change;
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks; and
- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which (inter alia):

- a) promote social interaction;
- b) are safe and accessible;
- c) enable and support healthy lifestyles.

To provide the social, recreational and cultural facilities needed by communities, **Paragraph 97** states that planning decisions should (inter alia):

- a) plan positively for the provision and use of shared spaces and community facilities;
- b) guard against the unnecessary loss of valued facilities and services;
- c) ensure that established facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- d) ensure an integrated approach to considering the location of community facilities and services.

Paragraph 108 states that transport issues should be considered from the earliest stages of development proposals so that opportunities from existing transport infrastructure are realised and opportunities to promote walking, cycling and public transport use are pursued.

Section 11 relates to making effective use of land. **Paragraph 123** states that planning policies and decisions should promote an effective use of land in meeting the need for uses.

Paragraph 124 sets out that planning decisions should (inter alia):

- encourage multiple benefits from urban land, including through mixed use schemes;
- give substantial weight to the value of using suitable brownfield land within settlements for identified needs;
- promote and support the development of under-utilised buildings.

Paragraph 125 encourages local planning authorities to take a proactive role in bringing forward land that may be suitable for meeting development needs.

Paragraph 127 states that local planning authorities should take a proactive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose, where this would help meet identified needs. In particular, proposals to make more effective use of sites providing community services should be supported where they maintain or improve the quality of service provision.

Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 requires planning decisions to ensure that developments (inter alia):

- a) will function well and add to the overall quality of the area, for the lifetime of the development;
- b) are visually attractive as a result of good architecture and layout;
- c) are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change; establish or maintain a strong sense of place, creating attractive, welcoming and distinctive places to visit;
- d) optimise the potential of the site to support local facilities; and
- e) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Section 16 of the NPPF relates to conserving and enhancing the historic environment. In determining applications, **Paragraph 200** requires the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 205 sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 208 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

London Plan (2021)

Policy GG1 '*Building strong and inclusive communities*' seeks to ensure that developments provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

Policy HC1 '*Heritage conservation and growth*' requires development proposals affecting heritage assets to conserve their significance. Development proposals should avoid harm and identify enhancement opportunities where possible.

Policy S1 '*Developing London's social infrastructure*' supports development proposals that provide high quality, inclusive social infrastructure. Development proposals that seek to make best use of land, including the public-sector estate will also be encouraged and supported; including the co-location of different forms of social infrastructure and

the rationalisation of facilities. New facilities should be easily accessible by public transport, cycling and walking and are encouraged in high streets and town centres. **Policy S1** further sets out that development proposals resulting in a loss of social infrastructure will be permitted where there are realistic proposals for re-provision that continue to serve the needs of the community.

Policy T1 *'Strategic approach to transport'* seeks to ensure that development proposals facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T2 *'Healthy streets'* sets out that proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should reduce the dominance of vehicles and be accessible on foot, by cycle and via public transport.

Local Plan Part 1

Policy C11 *'Community Infrastructure Provision'* seeks to ensure that community and social infrastructure caters for the needs of the existing community and future populations. The policy resists the loss of community facilities, except where justified, and seeks to ensure that resulting development ensures no net loss of facilities. **Policy C11** goes on to encourage the development of multi-purpose facilities that can provide a range of services and facilities at one accessible location. Libraries should be located in town centres to maximise community access and sustainable transport whilst building a sense of local community identity.

Policy E4 *'Uxbridge'* states that Uxbridge Town Centre's status as a Metropolitan Centre will be strengthened by delivering growth and promoting Uxbridge as a suitable location for (inter alia) community services.

Indeed, supporting paragraph 9.59 specifically states *'Hillingdon is relatively well served by cultural facilities such as libraries. Some existing facilities need to be upgraded to provide shared facilities to reflect the varying cultural interests of different communities. Where there is a recognised need for new facilities, these will be encouraged.'*

Paragraph 9.60 also sets out the Council's ambition to transform libraries to form 'community hubs' that are accessible to all members of the community offering a range of facilities from reading materials, free access to electronic information and increasing opportunities for informal learning that can lead to qualifications and employment.

Policy HE1 *'Heritage'* states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes statutorily listed buildings, and encourage the reuse and modification of heritage assets.

Policy T1 *'Accessible Local Destinations'* seeks to reduce the impact of development on the transport network by steering it towards the most appropriate locations. All development should encourage access by sustainable modes and include good cycling and walking provision.

Local Plan Part 2

Policy DMCI 1 *'Retention of Existing Community Facilities'* states that proposals involving the loss of an existing community facility will be permitted if the specific use is no longer required on-site. In such circumstances, Part A of the policy states evidence must be provided to demonstrate that:

- i) the proposal would not lead to a shortfall in provision for the specific use within the local catchment area;
- ii) there is either no demand for another suitable social infrastructure use on-site, or that the site/premises is no longer appropriate for social infrastructure uses; and
- iii) any replacement/relocated facilities for the specific use provides a level of accessibility and standard of provision at least equal to that of the existing facility.

Policy DMCI 2 *'New Community Infrastructure'* also supports proposals for the provision of new community facilities where they:

- i) are located within the community or catchment that they are intended to serve;
- ii) provide buildings that are inclusive, accessible, flexible and which provide design and space standards that meet the needs of intended occupants;
- iii) are sited to maximise shared use of the facility, particularly for recreational and community uses.

Policy DMHB 1 *'Heritage Assets'* states that the Council will expect development proposals to avoid harm to the historic environment.

Policy DMHB 2 *'Listed Buildings'* sets out that applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.

Policy DMT 1 *'Managing Transport Impacts'* requires developments to (inter alia):

- Be accessible by public transport, walking and cycling from the catchment area that it is likely to draw its employees, customers or visitors from;
- Maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
- Provide equal access for all people, including inclusive access for disabled people;
- Adequately address delivery, servicing and drop-off requirements; and
- Have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

Planning Assessment

Principle of Development

The application seeks planning permission for the change of use of the existing Middlesex Suite function room within the Civic Centre to a library use, as well as associated internal alterations in order to facilitate the relocation of the

existing Uxbridge Library from the High Street and the relocation and streamlining of existing Civic Centre services and functions.

The thrust of planning policies at national, strategic and local level seeks to ensure that developments retain/provide access to good quality community spaces, services, amenities and infrastructure. Indeed, developments which make the best use of the public-sector estate are encouraged and supported; including the co-location of different forms of social infrastructure and the rationalisation of facilities. Such developments are also encouraged in areas that are easily accessible by public transport and do not increase reliance on private car use.

Local Plan Policies DMCI1 and DMCI 2 specifically require any relocated facilities to provide a level of accessibility and standard of provision at least equal to that of the existing facility in order that they remain accessible to the community and catchment they are intended to serve. Developments must also provide buildings that are inclusive, accessible, flexible and designed to meet the needs of all end users. Proposals which maximise shared use of the facility are also supported.

Whilst the proposal would result in the closure of the existing library, the accompanying drawings and DAS demonstrate the facility would be re-provided to a significantly improved, modernised standard within the existing Civic Centre and therefore there would be no loss of community facilities. Furthermore, the application site is situated some 300m south-east of the existing Uxbridge Library, within Uxbridge Metropolitan Centre and within an area of PTAL 4/5 (very good accessibility to public transport). As such, the relocated facility will continue to serve its existing catchment and will remain easily accessible by public transport.

The proposals therefore comply with the NPPF, London Plan Policies GG1 and S1, and Local Plan Policies CI1, E4, DMCI1 and DMCI2 and the principle of the proposed relocation of the library is entirely acceptable.

Heritage Impact

National, strategic and local planning policies seek to ensure that developments avoid harm to the historic environment and applications include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.

The application site is Grade II listed and the official list entry confirms:

'Pursuant to s1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act, it is declared that the interior of the building (that is, those areas enclosed on all sides) is not of special architectural or historic interest.'

Therefore, as the proposals are focussed entirely on the interior of the building and do not seek any external alterations, there would be no impact on the external fabric of the building that is of special historic and architectural interest. Pre-applications with Council officers have confirmed that listed building consent is not required for the application proposals.

Notwithstanding the limited interest in the interior, the proposals will also better reveal the original internal composition of the building by reinstating the previously blocked up original openings in structural walls and the central, high ceiling area will be revealed by removing the low-level suspended ceiling and opening up the previously blocked Crittall windows.

Historical research undertaken by project heritage consultants Portico Heritage confirms that the Middlesex Suite forms part of the original 'County Buildings' constructed in 1939. The original building housed a clinic on the ground floor and library services at first floor above. The library was opened in 1940 and operated from the first floor of the now Middlesex Suite until relocation to 22 High Street in 1974. It is therefore appropriate in heritage terms that the first floor of the Middlesex Suite should be returned to its originally intended function.

The proposals would therefore result in no harm to the significance of the Grade II listed building, and in fact would return it to its original use, whilst enabling better legibility of the original internal composition of the building. The application is supported by a Heritage Statement prepared by Portico Heritage, which draws the following conclusions:

- Historical research highlights the appropriateness of the proposals – returning the space to its originally designed purpose and reinstating the physical civic connection between various council services.
- The 'change of use' to Library can be regarded as a positive heritage outcome – returning the use of the first floor to its original function.
- Listed Building Consent has already been granted for the associated works to complete the link between the Middlesex Suite and the existing main reception link.
- The alteration will not alter the ability to fully appreciate the architectural composition and significance of the civic centre and will not fundamentally affect the appearance of the Civic Centre.
- The proposals will much improve circulation and legibility around the complex.

As such, the proposals comply with the NPPF, London Plan Policy HC1 and Local Plan Policies HE1, DMHB 1, and DMHB 2 in terms of heritage conservation and impact.

Transport and Highways

The application is supported by a Transport Statement prepared by i-Transport which provides the following analysis of the proposals in transport terms:

The application involves the relocation of the existing library 300m south-east to the Civic Centre from its existing location at 22 High Street. As such, the library will remain accessible by the same excellent range of public transport options within a short distance, whilst serving the same catchment as the existing facility.

There are no changes proposed to the existing access at the site and there will be no dedicated car parking provided on-site, the same as the situation at the existing library. There is a good range of cycle parking provided around the Civic Centre, and short-stay cycle parking is available outside the Civic Centre and along the High Street.

The library will employ up to eight members of staff, who will be able to make use of sustainable transport options to travel to the site, or to apply for a permit at the Civic Centre car park if a blue badge space is required. It is anticipated that existing staff will likely travel to work in the same method as they have done historically. Therefore, no new trips will be generated, as the proposal involves the transferring of trips from the existing library site to the proposed library site.

As a result of the proximity of the Middlesex Suite to the existing library, the transport impact of staff travel is anticipated to have no impact in transport and highways terms, and movements to and from the development will simply be transferred.

It has therefore been demonstrated that the proposals will have no impact on highways movements or parking, and will continue to utilise sustainable transport options as per the existing situation. As such, the proposals comply with the NPPF, London Plan Policies T1 and T2, and Local Plan Policies T1, and DMT 1 in transport terms.

Conclusion

The proposals will utilise an existing unproductive space, returning it to its historic use whilst creating a cluster of interrelated functions within the civic centre. This planning statement has demonstrated that the proposed scheme complies with the NPPF and all relevant development plan policies, representing sustainable development that should be approved without delay.

We trust that this application provides officers with sufficient information to validate the application. If you require any further information to assist with the determination of this application, please do not hesitate to contact us. Otherwise, we look forward to receiving confirmation that the application is valid and a decision within the statutory 8-week determination period.

Yours faithfully



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