SFPLANNING

7th February 2019

Planning Department
Hillingdon Council
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Dear Sirs,

Planning, Design & Access Statement

1200 Uxbridge Road, Hayes

Planning Application – Alterations and extensions to exiting building to provide 4no. additional flats (3 x 2 bed & 1 x 3 bed)

On behalf of our Client, Diamond Corporation, SF Planning Limited have been instructed to prepare this planning application in relation to 1200 Uxbridge Road, Hayes within the London Borough of Hillingdon. The description of the proposed development is:

> *"Demolition of part of existing building and alterations, roof extension and conversion of part of the undercroft of the main building to provide 4no additional flats."*

This submission also includes:

- *Application forms;*
- *CIL forms;*
- *Site location plan;*
- *Block plan;*
- *Existing and proposed elevations & floor plans;*
- *Planning, Design & Access Statement (this letter);*
- *Transport Assessment;*
- *Noise Assessment;*
- *Previously submitted Land Contamination Report;*
- *Previously submitted Flood Risk and Drainage Assessment;*
- *Application fee of £1,848 (to follow).*

Site

The site comprises of a former office building of 1950s/1960s construction and up to three storeys with associated ground floor car parking area, on the north side of Uxbridge Road within the London Borough of Hillingdon.

In terms of planning history available on the Council's records there was an approval in 1992 for the enclosure of an existing covered parking area for use as offices. More recently, prior approval was granted (ref: 1577/APP/2018/4047) for the change of use of the office building to provide 16no. residential flats with 16 on site car parking spaces.

Proposals

These proposals involve the demolition of part of the existing building to the northeast of the site to provide additional parking, external alterations to the existing main building, a single storey roof extension and conversion of part of the undercroft of the building to provide 4no additional flats.

Each flat would be provided with a parking and cycle parking space and private terraces for external amenity space. In addition, some minor external alterations and improvements are proposed to the exterior of the building, as set out on the accompanying drawings.

Justification

- ***Principle of Development***

The parts of the building which are proposed to be utilised to provide additional residential accommodation are not in employment use since they comprise of a redundant area of undercroft parking and the underutlised roof area of the building, which are no longer required following the granting of prior approval to change the office building to residential accommodation (16 flats). Therefore, there is no "loss" of employment floor space as part of these proposals.

In relation to the proposed additional 4 units of housing, at a national planning policy level, throughout the revised NPPF, the Government has clearly sought to emphasise the use of brownfield and underutilised buildings (such as this site) within settlements for additional housing.

Paragraph 59 of the NPPF sets out that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.

Paragraph 68 also notes the important contribution that small and medium sites (again such as this site) can make to meeting the housing requirement of an area and notes that such sites are often built out quickly. The paragraph seeks development of a good mix of sites with LPAs being asked to accommodate at least 10% of their housing requirement on sites of 1ha or less.

Paragraph 68(c) states that LPAs should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.

Paragraph 80 emphasises planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on these proposals which would support economic growth and productivity including boosting local businesses through local construction jobs as well as additional residential units to support the town centre.

Paragraph 85 asks councils to recognise that; *"residential development often plays an important role in ensuring the vitality of centres"* and asks them to encourage residential development on appropriate sites. The site is clearly appropriate for housing, given its planning history and the recent prior approval decision to allow the conversion of the main office building to flats.

Paragraph 118 (c), (d) and (e) are highly relevant and support these proposals since they makes it clear planning policies and decisions should;

> *"give substantial weight to the value of using suitable brownfield land within settlements for homes."*
>
> *"promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)."*
>
> *"support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers."*

The revised NPPF at paragraph 123 also makes it clear that decisions should avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site, as is the case with these proposals.

In addition, paragraph 127 sets out planning policies and decisions should ensure that developments optimise the potential of sites to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks.

At a local level, there is a need to meet and exceed identified increased minimum housing targets in the latest alterations to the London Plan (2015 & 2016) including bringing forward small brownfield sites such as this site.

Given the planning history of the site and clear policy support at a local and national level for the provision of additional residential accommodation within this location, the proposals should be considered acceptable in principle.

- ***Design & Layout***

Each flat would be self-contained and have been designed to meet national space standards to offer a good standard of internal accommodation. Private terraces have been provided for all flats as set out on the accompanying drawings and each flat

would have 1no allocated car parking space and access to waste and recycling stores as shown on the drawings.

In addition, the site is in close proximity to a number of public open space areas including Hayes End Recreation Ground which offers open space, sports facilities and children's plan equipment

The external works to the building comprise of a small roof top extension in place of a redundant plant room, infilling of an open undercroft and other minor external alterations to the building, as set out on the accompanying drawings. The proposals would add minimal overall mass to the existing building and have been designed to complement the existing materials on the building.

Furthermore, the proposed alterations and extensions would significantly improve the overall appearance of the site since it would involve the removal of the low quality building to the northeast of the site which is in a deteriorating state along with enhancements to the external appearance of the existing building.

These proposals respect the visual amenity of the area by virtue of its minimal increase in the overall scale of the building and given the nature of the works would not have a material impact on the amenity of occupiers of the site or its neighbours.

The design of the scheme is considered to have the key principles of NPPF, London Plan and Hillingdon policies BE 13 of the 'saved' UDP policies and BE 1 of the adopted Strategic Policy Document.

- ***Transport***

The NPPF requires developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximized. It also sets out development should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.

The site is within an accessible location within Hayes, with a PTAL (Public Transport Accessibility Level) rating of 3. The site is in close proximity to bus routes that run along Uxbridge Road which is a main arterial route. There are 5 different bus routes operating from the bus stop just 35m to the west. In addition, Uxbridge Road has numerous local services to support day to day living for residents including shops, a pharmacy, restaurants, pubs and a supermarket.

These proposals provide 1:1 car parking spaces for the proposed flats and 40 cycle parking spaces and provides additional details on the proposed refuse and recycling store.

More than adequate cycle parking has been included for this scheme, as shown on the accompanying plans. When combined with the availability of public transport, and the available shopping, leisure and employment facilities within walking distance, it is considered that the occupants would be able to rely on use of sustainable transport methods, as opposed to private car.

An updated full transport assessment has been carried out to accompany the application and provides further support for the proposals.

Given the accessible location, the additional justification provided in the transport statement and within this letter on the proposed parking level, the proposal would not detrimentally impact on the highway network and passes the relevant prior approval test.

The NPPF requires developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximized. It also sets out development should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.

Paragraph 109 of the revised NPPF once again makes it clear 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.

The site is within an accessible location in close proximity to services and public transport links. A full assessment of the scheme, the accessibility of the location and highway and transport impact has been provided within the accompanying Transport Assessment from EAS Transport Planning Consultants.

In terms of car parking, 1:1 provision is proposed and adequate cycle parking have been included for this scheme, as shown on the accompanying proposed plans.

When combined with the availability of public transport and the available shopping, leisure and employment facilities within walking distance, it is considered that the occupants would be able to rely on use of sustainable transport methods, as opposed to private car.

Given the accessible location and proposed parking level, the proposal would not detrimentally impact on the highway network and should be considered acceptable in this regard.

- ***Contamination***

A desk-based study was conducted in to the potential risk of contamination at the site as part of the previous prior approval application by Jomas Associates Ltd. The proposal is considered to be in accordance with the NPPF and relevant development plan policies and any further testing and mitigation can be covered by planning condition.

- ***Flood Risk***

The site is within flood zone 1 (low risk). The NPPF requires that applicants consider both impact of flooding on the occupants of buildings and also impact of a development on flooding in the area.

A Flood Risk Assessment has been conducted by Turner Jomas & Associates as part of the previous prior approval application, and is submitted with this application for background. The report finds that the scheme can be constructed and operated safely in flood risk terms without increasing flood risk elsewhere. Therefore, the proposal is considered to be in accordance with the NPPF and would not impact on or be affected by flooding.

- ***Noise Impacts***

A noise impacts assessment has been carried out by KP acoustics as part of the previous prior approval application, which is submitted with this application for background. The assessment concluded with a recommendation that the existing window units will provide suitable internal noise levels for all residential accommodation of the development would be commensurate with the design range of BS8233.

- ***Affordable Housing***

The revised NPPF at paragraph 63 of that document states the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (which doesn't apply here).

A 'major development' in terms of housing is defined in the NPPF as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. As such the development in question would not be classified as major Development (as it is for 4no. flats) and as the site is not within a designated rural area, the proposal would not trigger a requirement for affordable housing.

Conclusions

In conclusion, it is considered that the application scheme fully accords with the latest national planning policy objectives within the NPPF, as well as those at a local level.

This proposals will make efficient and positive use of an underutilised site in an area which has good accessibility to local services and public transport within Hayes. The flatted form of development within the proposed extensions is entirely consistent and complementary to the prevailing character and appearance of the area, including the recently granted flats within the existing building.

Based upon the detailed technical design and planning assessment justification case presented in support of the scheme the Applicant contends that the case in support of the proposals is compelling and that planning permission should be granted.

We look forward to acknowledgement of the application shortly along with details of the appointed case officer.

Yours faithfully

P Jenkins

Paul Jenkins **MRTPI**
SF Planning Limited