Report of the Deputy Director of Planning and Regeneration

Address: LAND OFF HAREFIELD ROAD

Development: Comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2) with ancillary uses and commercial unit at ground floor level (Use Class E) in buildings up to 7 storeys with car parking, landscaping and associated works.

LBH Ref Nos: 16299/APP/2020/3313

Drawing Nos:

UXB001-MPI-XX-XX-DR-A-010100 Rev P1
UXB001-MPI-XX-XX-DR-A-010200 Rev P1
UXB001-MPI-XX-XX-DR-A-010002 Rev. P2
UXB001-MPI-XX-XX-DR-A-100001 Rev. P1
UXB001-MPI-XX-XX-DR-A-010001 Rev. P2
UXB001-MPI-XX-XX-DR-A-100002 Rev. P1
UXB001-MPI-ZZ-XX-DR-A-010004 Rev. P2
UXB001-MPI-ZZ-XX-DR-A-010005 Rev. P1
UXB001-MPI-ZZ-MZ-DR-A-200000_02 Rev. P3
UXB001-MPI-ZZ-01-DR-A-200001 Rev. P3
UXB001-MPI-ZZ-02-DR-A-200002 Rev. P3
UXB001-MPI-ZZ-03-DR-A-200003 Rev. P3
UXB001-MPI-ZZ-04-DR-A-200004 Rev. P3
UXB001-MPI-ZZ-05-DR-A-200005 Rev. P3
UXB001-MPI-ZZ-06-DR-A-200006 Rev. P3
UXB001-MPI-ZZ-XX-DR-A-200010 Rev. P3
UXB001-MPI-ZZ-MZ-DR-A-200100_02 Rev. P4
UXB001-MPI-ZZ-00-DR-A-200100 Rev. P6
UXB001-MPI-ZZ-01-DR-A-200101 Rev. P3
UXB001-MPI-ZZ-02-DR-A-200102 Rev. P3
UXB001-MPI-ZZ-03-DR-A-200103 Rev. P3
UXB001-MPI-ZZ-04-DR-A-200104 Rev. P3
UXB001-MPI-ZZ-05-DR-A-200105 Rev. P3
UXB001-MPI-ZZ-06-DR-A-200106 Rev. P3
UXB001-MPI-ZZ-XX-DR-A-200110 Rev. P3
UXB001-MPI-XX-XX-DR-A-200200 Rev. P3
UXB001-MPI-XX-XX-DR-A-200201 Rev. P2
UXB001-MPI-XX-XX-DR-A-200202 Rev. P2
UXB001-MPI-XX-XX-DR-A-200203 Rev. P2
UXB001-MPI-XX-XX-DR-A-200204 Rev. P2
UXB001-MPI-XX-XX-DR-A-200300 Rev. P2
UXB001-MPI-XX-XX-DR-A-200301 Rev. P2
UXB001-MPI-XX-XX-DR-A-200302 Rev. P2
UXB001-MPI-XX-XX-DR-A-200500 Rev. P3
UXB001-MPI-XX-XX-DR-A-210300 Rev. P2
UXB001-MPI-XX-XX-DR-A-210301 Rev. P2
UXB001-MPI-XX-XX-DR-A-210302 Rev. P2

UXB001-MPI-XX-XX-DR-A-300100 Rev. P2
UXB001-MPI-XX-XX-DR-A-300101 Rev. P2
UXB001-MPI-XX-XX-DR-A-300102 Rev. P2

Date Plans Received: 15-10-2020 **Dates of Amendments:**
10-05-2021
12-04-2021
02-03-2021
26-01-2021
04-12-2021

Date Application Valid: 27-10-2020

1. SUMMARY

The application seeks permission for the comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2), restaurant, cafe and commercial unit (Use Class E) in buildings up to 7 storeys with car parking, landscaping and associated works.

The proposal has been amended in response to statutory and internal consultee comments. The amendments include revisions to the height of the proposed building, incorporating additional soft landscaping. The proposed wellness centre and commercial spaces have been reconfigured.

The main considerations of the application are the principle of the development, quality of accommodation for future residents, affordable housing provision, design and appearance, impact upon heritage assets, impact upon neighbouring residential amenity, transport and highways implications, air quality and energy and sustainability measures.

The proposal would result in the loss of existing retail units, however their loss would not result in harm to the viability and vitality of the town centre. The provision of specialist older persons accommodation would contribute to meeting the annual benchmark of 180 units per annum set by the London Plan (2021).

The off-site affordable housing of £3,078,000 is proposed, this follows a review of the Financial Viability Assessment by an independent viability consultant who considers the scheme generates a positive land value of £3,078,000. On this basis, the proposal would provide the maximum reasonable amount of affordable housing.

The proposed development has been designed to cater for residents requiring care and support. The proposal provides communal facilities that would be accessible to residents and to the public, including a wellness centre and a separate commercial unit. Various uses within the development include the wellness centre, library, therapy and treatment rooms,

which encourage social interaction. Positive weight is given to the social and community benefits arising from this scheme.

Impact to the level of daylight and sunlight of neighbouring properties has been fully considered following the submission of a daylight and sunlight report, which highlights minimal transgressions is considered acceptable within the context of the site. The protection of neighbouring privacy has sufficiently been mitigated through design and relevant planning conditions. Overall, neighbouring amenity is not considered to be unduly harmed by the development.

Following amendments to the layout, scale and height of the proposal is considered appropriate. The application proposal strikes an appropriate balance in terms of its height and scale and would provide an acceptable transition between this edge of town centre location and the suburban residential context to the north of the site.

The site has a high public transport accessibility level (PTAL) of 5. The development proposes some on-site accessible parking for future residents, dedicated mini-bus car parking, car club and drop off and pick up bays are also proposed. Car parking stackers are omitted from the proposal and therefore pressure on the internal access road has reduced and therefore the amended proposal, including internal road layout is considered acceptable.

Further information has been provided by the regarding overheating and the overheating methodology is considered acceptable.

Great weight has been attached to the delivery of specialist older persons accommodation, the weight given to all of the benefits arising from the implementation of the delivery of the proposed development, and the weight attached to all of the benefits arising from the scheme outweigh concerns relating to the overall height. The application is therefore recommended for approval subject to condition and a legal agreement.

RECOMMENDATION

That delegated powers be given to the Deputy Director of Planning and Regeneration to grant planning permission, subject to the following:

1. That the application be referred back to the Greater London Authority to complete Stage 2 referral.

2. That should the Mayor not direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application, the Council enters into an agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or Section 278 Highways Act 1980 (as amended) and all appropriate legislation to secure:

i. Affordable housing £3,078,000 and an early and late stage review mechanisms in line with Policy H5 of the London Plan (2021).

ii. Occupancy restriction to 65+ years requiring a minimum of 2.5 hours of care to secure Use Class C2;
iii. To secure all necessary highway works including written agreement from the Local Planning Authority; (Section 278/S38 including works to provide appropriate improvements to kerbs and the adjoining footpath along Harefield Road and landscaping and tree planting as part of the proposals);
iv. A car parking management scheme;
v. A full and formal Travel Plan with associated £20,000 bond to include a Sustainable Transport Measures is required to be submitted and agreed in writing by the LPA before occupation of the development. Thereafter, the Travel Plan is required to be reviewed annually to monitor and if required, update and/or amend the document to the satisfaction of the LPA, in order that its aims and objectives are achieved.
vi. Parking Permit exclusion clause for all future residents for Uxbridge N Parking Management Zone U1 (other than blue badge holders);
vii. Air Quality: in line with the SPD and given the site is located in an air quality management area, a contribution in the sum of £69,262;
viii. Carbon Fund: a contribution of £99,473 for a carbon fund to make up for the shortfall for this development and in order to make the development policy compliant (£1800 for every tCO2/annum that is below the zero-carbon target);
ix. A contribution to the provision of health facilities with the authority's area £900,229
x. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances;
xi. Delivery and Servicing Plan for both the commercial and C2 use to include smaller domestic deliveries;
xii. Healthy streets and active travel contribution £45,000;
xiii. Car club bay;
xiv. Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

3. That Officers be authorised to negotiate and agree the detailed terms of the proposed agreements.

4. If the Legal Agreement has not been finalised within 6 months of the date of Committee, or such other date as agreed by the Deputy Director of Planning and Regeneration, delegated authority be given to the Deputy Director of Planning and Regeneration to refuse planning permission for the following reason:

"The applicant has failed to deliver necessary offsite highway works and to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of affordable housing, Highways improvements, travel plan, Air Quality, Carbon Offset Contribution, offsite Flooding Mitigation

and employment training. The scheme therefore conflicts with Policy DMCI 7 of the Hillingdon Local Plan: Part Two Development Management Policies (2020), the London Borough of Hillingdon Supplementary Planning Document on Planning Obligations, Policy DF1 of the London Plan (2021) and paras 54-57 of the NPPF 2019."

5. That subject to the above, the application be deferred for the determination by Deputy Director of Planning and Regeneration under delegated powers to approve the application, subject to the completion of legal agreement(s) under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the applicant.

6. That if the application is approved, the following conditions be attached, with delegated authority issued to the Deputy Director of Planning and Regeneration to vary and alter the conditions prior to a decision being issued:

CONDITIONS

1. Time Limit
The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON
To comply with Section 91 of the Town and Country Planning Act 1990.

2. Accordance with Approved Plans
The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

UXB001-MPI-XX-XX-DR-A-010001 Rev. P2
UXB001-MPI-XX-XX-DR-A-100001 Rev. P1
UXB001-MPI-XX-XX-DR-A-100002 Rev. P1
UXB001-MPI-ZZ-XX-DR-A-010004 Rev. P2
UXB001-MPI-ZZ-XX-DR-A-010005 Rev. P1
UXB001-MPI-ZZ-00-DR-A-200000 Rev. P4
UXB001-MPI-ZZ-MZ-DR-A-200000_02 Rev. P3
UXB001-MPI-ZZ-01-DR-A-200001 Rev. P3
UXB001-MPI-ZZ-02-DR-A-200002 Rev. P3
UXB001-MPI-ZZ-03-DR-A-200003 Rev. P3
UXB001-MPI-ZZ-04-DR-A-200004 Rev. P3
UXB001-MPI-ZZ-05-DR-A-200005 Rev. P3
UXB001-MPI-ZZ-06-DR-A-200006 Rev. P3
UXB001-MPI-ZZ-XX-DR-A-200010 Rev. P3
UXB001-MPI-ZZ-MZ-DR-A-200100_02 Rev. P4
UXB001-MPI-ZZ-00-DR-A-200100 Rev. P6
UXB001-MPI-ZZ-01-DR-A-200101 Rev. P3
UXB001-MPI-ZZ-02-DR-A-200102 Rev. P3
UXB001-MPI-ZZ-03-DR-A-200103 Rev. P3

UXB001-MPI-ZZ-04-DR-A-200104 Rev. P3
UXB001-MPI-ZZ-05-DR-A-200105 Rev. P3
UXB001-MPI-ZZ-06-DR-A-200106 Rev. P3
UXB001-MPI-ZZ-XX-DR-A-200110 Rev. P3
UXB001-MPI-XX-XX-DR-A-200200 Rev. P3
UXB001-MPI-XX-XX-DR-A-200201 Rev. P2
UXB001-MPI-XX-XX-DR-A-200202 Rev. P2
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UXB001-MPI-XX-XX-DR-A-200204 Rev. P2
UXB001-MPI-XX-XX-DR-A-200300 Rev. P2
UXB001-MPI-XX-XX-DR-A-200301 Rev. P3
UXB001-MPI-XX-XX-DR-A-200302 Rev. P3
UXB001-MPI-XX-XX-DR-A-200500 Rev. P3
UXB001-MPI-XX-XX-DR-A-210300 Rev. P2
UXB001-MPI-XX-XX-DR-A-210301 Rev. P2
UXB001-MPI-XX-XX-DR-A-210302 Rev. P2
UXB001-MPI-XX-XX-DR-A-300100 Rev. P2
UXB001-MPI-XX-XX-DR-A-300101 Rev. P2
UXB001-MPI-XX-XX-DR-A-300102 Rev. P2

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON
To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (2021)

3. COM5 General compliance with supporting documentation
The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

Response to Highways Comments dated February 2021
Daylight, Sunlight and Overshadowing Review Letter dated March 2021
Response to FVA dated 12 January 2021
Acoustic Planning Report dated January 2021
Acoustic Technical Note
Response to Daylight and Sunlight Report dated January 2021
Response to Social Care Comments
Overheating Risk Assessment Technical Note
Air Quality Assessment dated September 2020
Design and Access Statement dated September 2020
Flood Risk Assessment dated September 2020
Utility Infrastructure Strategy dated September 2020
Heritage and Townscape Assessment dated September 2020
Ground Investigation Report September 2020
Acoustic Planning Report dated September 2020
Demolition and Site Waste Management Plan dated September 2020

Sustainability Appraisal dated September 2020
Daylight, Sunlight and Overshadowing Report dated September 2020
Travel Plan dated September 2020
Tree Survey and Arboricultural Assessment dated September 2020
Wind Microclimate Assessment dated September 2020
Archaeological Desk Based Assessment dated September 2020
Energy Statement dated September 2020
Construction Logistics Plan dated September 2020
Delivery and Servicing Plan dated September 2020
Preliminary Ecological Appraisal dated September 2020
Covering Letter dated October 2020
Utility Infrastructure Strategy dated March 2021
Sustainability Statement dated March 2021
Fire Statement dated March 2021
Landscape Addendum dated March 2021
Flood Risk Assessment and Drainage Strategy, dated March 2021
Townscape Review dated March 2021
Covering Letter dated March 2021
Letter of Conformity - Archaeological Desk Based Assessment dated March 2021
Letter of Conformity - Ecology dated March 2021
Air Quality Assessment Addendum dated March 2021
Tree Survey & Arboricultural Assessment dated March 2021
Internal Daylight, Sunlight Overshadowing Addendum Report
Planning Review Confirmation relating to Demolition and Site Waste Management Plan and Construction Environmental Management Plan dated March 2021
Planning Statement Addendum dated March 2021
Letter of Conformity, Geo-environmental Assessment dated March 2021
Technical Addendum Noise dated March 2021
Transport Assessment Addendum dated March 2021
Detailed Construction Logistics Plan dated March 2021
Delivery and Servicing Plan dated March 2021
Financial Viability Assessment dated September 2020
Response to Contaminated Land Matters dated December 2020
Response to Access Officer Comments dated December 2020
Response to Air Quality Officer Comments dated December 2020
Response to Refuse and Waste Officer Comments dated December 2020
Travel Plan dated March 2021
Heritage, Townscape and Visual Impact Assessment Addendum dated March 2021
Letter of Conformity (Wind) dated March 2021
Statement of Community involvement dated March 2021
Design and Access Statement Addendum dated March 2021
Energy Statement dated March 2021
Transport Technical Note May 2021
Circular Economy Statement dated April 2021
Energy Statement Rev. 04
Whole Life Cycle Carbon Assessment dated April 2021

Reason: To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

4. Detailed Description of Development

The development hereby approved, shall provide 182 units, together with integrated nursing care and associated communal and support services including ancillary communal, care and well-being facilities including a restaurant, cafe/bar and wellness centre/gym and a commercial unit with 46 car parking spaces and 76 cycle parking spaces.

Reason: To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

5. External Materials

Prior to above ground works, detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority, and the works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:

(a) Samples of materials including all facing brickwork;
(b) Details of roof parapets, window and door reveals, spandrel panels
(c) Details of balconies, railings, metal cladding, rainwater pipes
(d) Details of privacy screening between balconies where appropriate
Sample panels required

Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panels approved.

Windows and doors

Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.
REASON
To provide high quality materials and finishes in accordance with Policy BE 1 of the Local Plan: Part One (2012) and DMHB 11 of the Local Plan: Part Two (2020).

6. Landscaping (car parking & refuse/cycle storage)

Prior to above ground works, a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Access Officer. The scheme shall include: -

1. Details of Soft Landscaping
1.a Planting plans (at not less than a scale of 1:100),
1.b Written specification of planting and cultivation works to be undertaken,
1.c Schedule of plants giving species (including pollution reducing trees), plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
2.a Refuse Storage
2.b Cycle Storage (32 long-stay and 44 short stay cycle parking spaces)
2.c Means of enclosure/boundary treatments
2.d Car Parking Layouts (including 46 car parking spaces, demonstration that 5 parking spaces (20%) are served by active electrical charging points and 41 (80%) are served by passive electrical charging points, 18 accessible spaces) 1 motor cycle parking space
2.e Hard Surfacing Materials
2.f Other structures

3. Details of Landscape Maintenance
3.a Landscape Maintenance Schedule for a minimum period of 5 years.
3.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

4. Schedule for Implementation

5. Other
5.a Existing and proposed functional services above and below ground
5.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON
To ensure the development complies with the provisions Hillingdon Local Plan Part 1 (November 2012), Policies DMHB 11 and DMHB 14 of the Local Plan: Part Two (2020) and Policy G5 of the London Plan (2021).

7. Podium Level Garden and Microclimate Assessment

Prior to above ground works, a podium level landscape scheme shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Access Officer. The scheme shall include: -

1. Details of microclimate assessment; and
2. Finished floor levels of the podium garden and the development adjoining the podium garden.

The development shall thereafter be implemented in accordance with the details approved.

REASON: To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

8. Ecological Enhancement

Prior to the above ground works, an ecological enhancement plan shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include plans and specifications that demonstrate the incorporation of measures and features within the landscaping and the fabric of the building that support a range of habitats and species, as a minimum it is recommended that living walls/screens, green roofs, bat and bird boxes and artificial refugia will be included.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence

Reason: To ensure that the development incorporates appropriate energy efficiency measures in accordance with Policy DMEI 2 of the Local Plan: Part 2 - Development Management Policies (2020) and G6 of the London Plan (2021).

9. External Lighting

Prior to works above ground level, details of external lighting related to the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority for agreement by the Access and Landscaping Officers. Such details shall include location, height, type and direction of light sources and intensity of illumination. The approved scheme shall be implemented prior to occupation and retained for the life of the development.
Reason: In the interests of the protection of the biodiversity in accordance with Policy EM7 of the Local Plan Part 1, Policy DMEI 7 and DMEI 8 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021)

10. SUDs; Maintenance

(a)Prior to commencement, (excluding demolition and site clearance) the details of a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it, manages water in the most sustainable ways and its compliance with the strategy set out in the Flood Risk Assessment produced by Tier Consult dated 03/09/2020 which sets out the site will: Achieve a run off rate from the site of 1.5l/ha/s. Any changes to the strategy should be justified and evaluated and the final proposals must be integrated with provision of green infrastructure, air quality and urban greening requirements to justify the most sustainable final solution is provided. Further details should be provided on: Any proposal should use of methods to minimise the use of potable water through
i. incorporating water saving measures and equipment.

ii. Collecting water for use and recycling

iii Levels of the site and Safe access and egress must be demonstrated - any above ground storage and or overland flooding or flows paths should be mapped, (please include depths and velocities and hazards) above the 100, plus climate change.

(b) Prior to occupation of the development, a Verification Report demonstrating that the approved drainage/SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include: As built drawings of the sustainable drainage systems including level information (if appropriate) Photographs of the completed sustainable drainage systems throughout the construction process Any relevant certificates from manufacturers/suppliers of any drainage features A confirmation statement of the above signed by a chartered engineer Management and Maintenance Prior to occupation a management and maintenance plan should be submitted to the Local Authority for approval in writing. This should cover the lifetime of the development of arrangements (through temporary works) to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, Appropriate performance specification, Remediation and timescales for the resolving of issues. Where there is overland flooding proposed, the plan should include the appropriate actions to ensure the safety of the users of the site should that be required.
Reason: To ensure that surface water run off is controlled and to ensure the development does not increase in accordance with Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy DMEI 10 of Local Plan Part 2 Development Management Policies (January 2020), National Planning Policy Framework (February 2019).

11. Bird Hazard Management Plan

Prior to above ground works, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the MoD (only) The submitted plan shall include details of:

Management of any flat/shallow pitched on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'.

The Bird Hazard Management Plan shall be implemented as approved on completion of the development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

12. Crane Operation

If during construction a crane is used, red static omni-directional lights shall be provided at the highest part of the crane and at the end of the jib it a tower crane is used, unless otherwise agreed in writing by the Local Planning Authority, agreed by Heathrow Aerodrome Safeguarding.

Reason: In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

13. Construction and Logistics Plan

Prior to development commencing, the applicant shall submit a construction management plan to the Local Planning Authority in consultation with the Ministry of Defence for its approval. The plan shall detail:

The CEMP shall comprise such combination of measures for controlling the effects of construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including the phasing of the works, hours of work, noise and vibration, air quality, waste management, site remediation, plant and equipment, site transportation and traffic management including routing, signage, permitted hours for construction traffic and construction materials deliveries. It will ensure appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting). All construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA in consultation with the Ministry of Defence.

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.
Reason: To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems in compliance with Policies DMAV 1, DMHB 11 and DMT 7 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

14. Low carbon technology

Prior to above ground works, full details and specifications of the low and zero carbon technology to be used in the development shall be submitted to and approved in writing by the Local Planning Authority. These shall include the type, size and proposed location within the site of the low and zero carbon technology required to meet the CO2 savings set out in the energy statement (Chapmanbdsp Rev 3, dated March 2021). In addition, full details of

the noise emissions associated with the Air Source Heat Pumps shall be provided along with any noise abatement technology to ensure noise pollution is avoided. Finally, full plans and specifications of the roof mounted PVs shall be provided including details of their pitch and orientation and consequential output. The development must proceed in accordance with the approved plans, details and specifications.

Reason: To ensure that the development incorporates appropriate energy efficiency in accordance with Policy SI 2 of the London Plan (2021).

15. Overheating and Cooling

Prior to above ground works, a scheme to reduce and minimise impacts to residents in more extreme heat events (DSY2 and 3 – CIBSE guidance and GLA Energy Assessment guidelines) shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly identify the permanent measures to reduce overheating in extreme events and the temporary arrangements available to residents. The scheme shall also set out the measures for warnings to be established prior to events occurring and the guidance available to individual residents to reduce the potential for overheating impacts. The development should be constructed, operated and managed in accordance with the approved scheme.

Reason: To minimise the risk of overheating impacts to residents in accordance with London Plan Policy SI4.

16. Non-Road Mobile Machinery

During onsite construction of any phase of development, all non-road transportable industrial equipment or vehicles which are fitted with an internal diesel powered compression ignition engine between 37 and 560KW and not intended for transporting goods or passengers on roads are required to meet Stage IIIB of EU Directive 97/68/E and be NRMM registered. Such vehicles must be run on ultra-low sulphur diesel (also known as ULSD 'cleaner diesel' or 'green diesel'). "Ultra-low sulphur diesel" means fuel meeting the specification within BS EN 590. Where these standards are succeeded, they should be applied when reasonable.

Exemptions to these standards may be granted for specialist equipment or for equipment with alternative emission reduction equipment or run on alternative fuels. Such exemptions shall be applied for in writing to the local planning authority in advance of the use of such vehicles, detailing the reasons for the exemption being sought and clearly identifying the subject vehicles. Exemptions that are granted will be in writing and such vehicles must not be used until written exemption has been issued by the local planning authority.

No vehicles or plant to which the above emission standards apply shall be on site, at any time, whether in use or not, unless it complies with the above standards, without the prior written consent of the local planning authority.

Reason: To protect the amenity of future occupants and/or neighbours, and to safeguard air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2), Policy SI1 of the London Plan (2021), and paragraph 170 of the National Planning Policy Framework (2019).

17. Air Quality Emission and Exposure Mitigation Plan

Prior to above ground works, details of a clear and effective low emission strategy (LES) have been submitted to and approved in writing by the Local Planning Authority. The strategy shall include, but not be restricted to:

a) effective ways to encourage residents so that the fleet composition visiting/using the site will be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards;

b) provision of a clean supply of energy to the site. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements. The boilers to be specified to meet ultra-low NOx emissions standards of < 40mg/kWh.
The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority.

The measures in the agreed scheme shall be maintained for the lifetime of the development.

Reason: To protect the amenity of future occupants and/or neighbours, and to safeguard air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2), Policy SI1 of the London Plan (2021), and paragraph 170 of the National Planning Policy Framework (2019).

18. Contaminated Land

(i) The development shall not commence until a scheme to deal with contamination has been submitted to the Local Planning Authority (LPA) in accordance with the Supplementary Planning Guidance Document on Land Contamination, and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

a) A site investigation, including where relevant soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

19 Fire Strategy

The development hereby approved shall be built out in accordance with the recommendations set out in the approved Fire Statement (Chapmanbdsp, rev 5, dated March 2021).

Reason: To ensure that the development meets Fire Safety Standards in accordance with policy D12 of the London Plan (2021).

20 Circular Economy

Prior to above ground works, a circular economy statement is submitted to and approved in writing by the local planning authority in consultation with the GLA. This shall include the provision of:
- a Bill of Materials for the main elements of the building that sets out the weight of each element (façade, sub-structure, structure, floors, roof, internal partitions), its weight divided by the GIA floor area of the building and a commitment to achieving a minimum 20% recycled content by value;
- a Recycled and Waste Reporting Table that details the weight of the waste arising from demolition, excavation and construction, the percentage of waste reused/recycled on site, offsite, the percentage to landfill, and the percentage to other management (e.g.

incineration), with the commitment to a 95% diversion from landfill for all three waste streams;
- specific measures to meet the Mayor's 65% target for Municipal waste recycling;
- for any residual waste that is destined for landfill, written evidence that the destination landfill(s) have the capacity to receive waste, along with a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility) where known;
- a commitment to producing a Post Completion Report setting out the predicted and actual performance against all numerical targets, and provide updated versions of the Recycling and Waste Reporting form and the Bill of Materials.

The development shall not be carried out otherwise than in accordance with the details so approved.

Reason: In the interests of sustainable development in accordance with Policy SI7 of the London Plan (2021).

21 Secured by Design

The site and car parking area shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No dwelling shall be occupied until accreditation has been achieved.

Reason: In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to ensure the development provides a safe and secure environment in accordance with policy DMHB 15 of the Local Plan Part 2 (2020).

22 Archaeology

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. Where appropriate, details of a programme for delivering related positive public benefits.
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Written schemes of investigation need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Reason: To secure archaeological investigation and the subsequent recording of the remains in accordance with Policy DMHB 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

23 Accessibility
The development hereby approved shall ensure that the units are constructed to accord with the technical specifications of M4(3)(2)(b) Wheelchair Accessible Standard dwellings as set out in Approved Document M to the Building Regulations 2010 (2015 edition).

REASON
To ensure that an appropriate standard of housing stock, in accordance with Policy D7 of the London Plan (2020) is achieved and maintained.

24. Opening hours for the commercial element of the proposal

The commercial premises shall not be open for customers outside the following hours: -
0800 and 2300 Mondays - Fridays
0800 to 2300 Saturdays
1000 to 1800 Sundays, Public or Bank Holidays.

Delivery and servicing shall not take place between 22:00 and 06:00.

REASON
To safeguard the residential amenity of the occupiers of adjoining and nearby properties and future occupants in accordance with policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

25. Plant Noise
Prior to above ground works, details of the measures to control plant noise emanating from the site to meet the limits (and follow the associated guidance) within the RBA Acoustic Planning Report Rev 3, dated 21 September 2020 and Technical Addendum, dated 10 March 2021, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the amenity of the occupants of the proposed development in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

26. Internal Noise Levels

Prior to above ground works, details of an AVO Guide Level 2 assessment, accounting for both LAeq and LAmax sound levels (including from sirens), and the measures to control external environmental noise ingress to meet relevant internal noise targets within habitable rooms during both ventilation and overheating conditions to be submitted to, and approved by, LBH. The Level 2 assessment and measures should account for the overheating assessment and energy strategy, with any mechanical system noise generated within the habitable rooms being assessed and adequately attenuated. Full details of the associated noise survey data, modelling assumptions and calculations to be included.

Reason: To safeguard the amenity of the occupants of the proposed development in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

27. Noise

Prior to above ground works, details of sound level measurements undertaken at the location of the south-eastern elevation of the scheme, overlooking Penfield Estate, prior to occupation, sufficient to check the likely degree of impact or otherwise from any commercial noise(e.g. from JR Autos) in accordance with the Noise SPD/BS 4142 (and BS 8233, where applicable), to be submitted to, and approved by, LBH. Where the requirements of the Noise SPD are not met and/or an impact is expected based on the guidance on BS 4142, details of the noise control measures to be incorporated into the scheme to be included in the submission.

Reason: To safeguard the amenity of the occupants of the proposed development in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

28. Levels

Prior to the commencement, plans of the site showing the existing and proposed ground levels and the proposed finished floor levels of all proposed buildings shall be submitted to and approved in writing by the Local Planning Authority. Such levels shall be shown in relation to a fixed and know datum point. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that the development relates satisfactorily to adjoining properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

29. Estate Management Plan

Prior to the first occupation of any residential units, details of an Estate Management Plan shall be submitted and approved in writing by the Local Planning Authority. Details shall include, but not be limited to the control of parking on internal access road, maintenance of the publicly accessible areas and maintenance of the blocks within the estate.

REASON

To safeguard the living environment of the future residential occupiers and highways movement .

30. Accessibility
Prior to the commencement of the development hereby approved, details of the pedestrian/vehicular gates/barriers into the site, incorporating facilities for the operation of gates/barriers by disabled persons, and manual operation of any gates/barriers in the event of power failure shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the gates/barriers shall be installed in accordance with the approved details and maintained for so long as the development remains on site.

REASON
In order to ensure the development achieves an appropriate level of accessibility in accordance with the London Plan (March 2021) and the Council's HDAS - Accessible Hillingdon.

31. Withdrawal of PD Rights for Change of Use
Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification) the ground floor commercial units hereby approved shall be used only for purposes defined as Use Class E(a)(b)(c)(d)(g)(i) and (ii) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

Reason: For the avoidance of doubt as to the extent of the permission granted. This application has been assessed on the basis that the commercial units will be used for commercial purposes only. Alternative uses may result in differing impacts which will need to be assessed by means of a planning application made for that purpose.

32. Extract and Flue
Notwithstanding the hereby approved plans, revised drawings and details
shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the ancillary café/restaurant units, demonstrating that the extractor flues shall not be visually intrusive.

The development shall be carried out strictly in accordance with the details so approved and maintained as such thereafter.

REASON: To ensure that the proposal does not cause harm to the character or appearance of the host building of the amenities of future occupants in accordance with Policy DHMB 11 of the Local Plan: Part Two (2020).

INFORMATIVES

1.The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2. The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (2021) and national guidance.

3.The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed proposals in the form of an archaeological project design. The design should be in accordance with the appropriate English Heritage guidelines. Should significant archaeological remains be encountered in the course of the initial field evaluation, an appropriate mitigation strategy, which may include archaeological excavation, is likely to be necessary.

4.Care should be taken during the building works hereby approved to ensure no damage occurs to the verge or footpaths during construction. Vehicles delivering materials to this development shall not override or cause damage to the public footway. Any damage will require to be made good to the satisfaction of the Council and at the applicant's expense. For further information and advice contact - Highways Maintenance Operations, Central Depot - Block K, Harlington Road Depot, 128 Harlington Road, Hillingdon, Middlesex, UB3 3EU (Tel: 01895 277524)."

5.You are advised this permission is based on the dimensions provided on the approved drawings as numbered above.

6.For compliance with the DDA please refer to the following guidance: -
· The Disability Discrimination Act 1995. Available to download from www.opsi.gov.uk
· Disability Rights Commission (DRC) Access statements. Achieving an inclusive environment by ensuring continuity throughout the planning, design and management of building and spaces, 2004. Available to download from www.drc-gb.org.
· Code of practice. Rights of access. Goods, facilities, services and premises. Disability discrimination act 1995, 2002. ISBN 0 11702 860 6. Available to download from www.drc-gb.org.
· Creating an inclusive environment, 2003 & 2004 - What it means to you. A guide for service providers, 2003. Available to download from www.drc-gb.org.
This is not a comprehensive list of Building Regulations legislation. For further information you should contact Building Control on 01895 250804/5/6 and 8.

7.Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-
A. Demolition and construction works which are audible at the site boundary shall only be

carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.
B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.
C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance' The Control of dust and emissions from construction and demolition.
D. No bonfires that create dark smoke or nuisance to local residents.
You are advised to consult the Council's Environmental Protection Unit (www.hillingdon.gov.uk/noise Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

8.The Council's Waste Service should be consulted about refuse storage and collection arrangements. Details of proposals should be included on submitted plans.
For further information and advice, contact - the Waste Service Manager, Central Depot - Block A, Harlington Road Depot, 128 Harlington Road, Hillingdon, Middlesex, UB8 3EU Tel. 01895 277505 / 506).

9.You should contact Thames Water Utilities and the Council's Building Control Service regarding any proposed connection to a public sewer or any other possible impact that the development could have on local foul or surface water sewers, including building over a public sewer. Contact: - The Waste Water Business Manager, Thames Water Utilities plc, Kew Business Centre, Kew Bridge Road, Brentford, Middlesex, TW8 0EE.
Building Control Service - 3N/01, Civic Centre, High Street, Uxbridge, UB8 1UW (tel. 01895 250804 / 805 / 808).

10.You are advised that if any part of the development hereby permitted encroaches by either its roof, walls, eaves, gutters, or foundations, then a new planning application will have to be submitted. This planning permission is not valid for a development that results in any form of encroachment.

11.All proposed new street names must be notified to and approved by the Council. Building names and numbers, and proposed changes of street names must also be notified to the Council. For further information and advice, contact - The Street Naming and Numbering Officer, Planning & Community Services, 3 North Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250557).

12.You are advised by London Borough of Hillingdon, Highways Management, that any works on the Highway, in relation to the reinstatement of any existing vehicle access, must be carried out with approval from the Highway Authority. Failure to reinstate an existing vehicle access will result in the Highway Authority completing the works, and the developer may be responsible for the costs incurred. Enquiries should be addressed to: Highways Maintenance, 4W/07, Civic Centre, Uxbridge, UB8 1UW.

13.A licence must be obtained from the Highway Authority before any works are carried out

on any footway, carriageway, verge or other land forming part of the public highway. This includes the erection of temporary scaffolding, hoarding or other apparatus in connection with the development for which planning permission is hereby granted. For further information and advice contact: - Highways Maintenance Operations, 4W/07, Civic Centre, Uxbridge, UB8 1UW

14.You are advised that care should be taken during the building works hereby approved to avoid spillage of mud, soil or related building materials onto the pavement or public highway. You are further advised that failure to take appropriate steps to avoid spillage or adequately clear it away could result in action being taken under the Highways Act 1980.

15. The applicant is reminded of the duties set out in the Disability Discrimination Act 1995, with regard to employment and service provision. Whilst an employer's duty to make reasonable adjustment is owed to an individual employee or job applicant, the responsibility of service providers is to disabled people at large, and the duty is anticipatory. The failure to take reasonable steps at this stage to facilitate access will therefore count against the service provider, if/when challenged by a disabled person. It is therefore recommended that the applicant takes full advantage of the opportunity that this development offers, to maximise accessibility to, around, and within the buildings of this proposed development.

16. The developer to supply copies to the LPA of electrical and other test certificates, where appropriate, and the operation and maintenance manuals for the drainage system prior to adoption.

The developer is obliged to maintain the drainage system in accordance with the approved design prior to adoption.

Any defects are rectified prior to handover of the drainage system by the developer.
All works which are intended to be offered for handover shall be subject to the following, once the developer has sought written approval from the LPA to the works being satisfactorily completed;
a 12 month functioning period where the developer is responsible during this period.
a rainfall event to occur where the system functions as approved

17. Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

18.Your attention is drawn to the fact that the planning permission does not override property rights and any ancient rights of light that may exist. This permission does not empower you to enter onto land not in your ownership without the specific consent of the owner. If you require further information or advice, you should consult a solicitor.

19.In accordance with the provisions of the NPPF, the Local Planning Authority has actively engaged with the applicant both at the pre application and application stage of the planning

process, in order to achieve an acceptable outcome. The Local Planning Authority has worked proactively with the applicants to secure a development that improves the economic, social and environmental conditions of the area. In assessing and determining the development proposal, the Local Planning Authority has applied the presumption in favour of sustainable development Accordingly, the planning application has been recommended for approval.

20.Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

21.All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

22.Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance' The Control of dust and emissions from construction and demolition.

23. The Council will recover from the applicant the cost of highway and footway repairs, including damage to grass verges.

3. CONSIDERATIONS

3.1 Site and Locality

The application site is located on the south eastern side of Harefield Road. The site measures 0.93 hectares and comprises 2 purpose-built retail units with an overall footprint of 3,150 sq.m (formerly Class A1, now Class E). Unit 1 Harefield Road is currently occupied by Wickes, and Unit 2 Harefield Road is currently occupied by Halfords. Each unit is single-storey but sections of mezzanine flooring have been provided for office and / or additional retail space. The surrounding area is characterised by a mix of uses, services and facilities including residential, retail, civic and commercial uses.

To the south west of the site is Uxbridge Police Station, a 3-storey building on lower lying land. To the south east of the site is Beasley Court which is a 4-storey office building adjacent to the access from Warwick place to the south. To the north-east is a group of light industrial units on what is known as the Penfield Estate. To the north of the site are the rear boundaries of gardens belonging to the terraced and semi-detached dwellings that line Lancaster Road and Harefield Road.

The site is self-contained and is served by its own car parking area which is provided to the front of the buildings. The parking is controlled by a private company and is for use by customers only. The site level is raised approximately 1.2 metres above the level of Harefield Road. The site begins to slope gently downwards towards the rear (south-east).

The site is located alongside Harefield Road, which is recognised as a local distributor road. The site is accessed directly from Harefield Road via a purpose-built junction and a two-way

access road. A turning bay is marked out on Harefield Road to accommodate waiting vehicles that are turning right into the site. The access road continues along the southern side of the buildings, servicing a yard and loading area to the rear of the shops and then looping to the west to join with Warwick Place. Access from Warwick Place is currently controlled by a gate.

The site includes mature trees and hedging planted around the fringes of the car parking behind a brick retaining wall that faces on to Harefield Road and continues around the remaining edges of the car park. There are also landscaped parcels and individual trees within the car park and a belt of mature trees providing a buffer between the retail buildings and the rear of gardens belonging to dwellings on Lancaster Road to the north-east.

Part of the Old Uxbridge / Windsor Street Conservation Area, which consists of shops on the eastern side of the High Street, lies approximately 60 metres to the south-west of the site. A number of the shop buildings within the Conservation Area are Listed. Approximately 225 metres to the west are the Uxbridge Lock and Rockingham Bridge Conservation Areas, which comprise of canal side landscaping and development. The North Uxbridge Area of Special Character extends to the north east of the site. 13 and 15 Lancaster Road, which back on to the eastern site boundary, are included within the Area of Special Character.

Watts Hall, a former chapel which is a Grade II Listed Building, is located close to the site, where the access road meets Warwick Place. Part of the magistrates court, which is to the west of the site on the opposite side of Harefield Road, is locally listed.

The site lies within an Archaeological Priority Area and an Air Quality Management Area. The most south western section of the site is also within an Air Quality Focus Area.

The site is located within the northern end of Uxbridge Town Centre which extends towards the west, where the majority of development consists of office buildings and to the south where the main concentration of retail is. The site itself does not fall within a primary or secondary shopping centre. Tall buildings within Uxbridge are concentrated towards the perimeter of the town centre, generally towards the north and west. The majority of these buildings contain offices although there are also residential buildings including the 8-storey building currently under construction at the Fassnidge site, approximately 150 metres south-west of the proposal site and Denham Lodge which is a 10-storey residential tower block approximately 350 metres to the west, which falls just outside of the Borough.

The site has a Public Transport Accessibility Level (PTAL) score of 5 (very good). The site is within walking distance of Uxbridge bus and train stations.

3.2 Proposed Scheme

The application is seeking planning permission for the comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2), cafe/restaurant and a commercial unit (Use Class E) in buildings up to 7-storeys, car parking, landscaping and associated works.

The proposal seeks to provide an Assisted Living development (Use Class C2) with ancillary uses supporting the main use. The development would be available to, and occupied by, those over 65 years of age qualifying for at least 2.5 hours of weekly medical care.

Within the residential care accommodation, 3 types of living accommodation will be provided, depending upon the needs of the residents. These include:

1) Guild Living Residences (GLR) - Specialist older persons accommodation which provides care in a style that can respond flexibly to increasing need while helping the individual to retain their place within their existing community. The units require tenancy agreements and are restricted to over 65s (unless they have a partner who would also be living in the accommodation). A minimum of 2.5 hours a week of personal care/support will be provided.

2) Guild Care Residences (GCR) - Functions as traditional care home accommodation where personal care and accommodation are provided together as a package. The units are available to rent and are restricted to over 65s (unless they have a partner who would also be living in the residences). Typically, there would be at least 3 hours of care per day for those with mobility, nursing or cognitive needs, but could also include companionship and company.

3) Guild Care Suites (GCS) - It would function very similar to GCR with an added level of care. End of life needs could be managed here, as can nursing and dementia needs. The units are restricted to over 65s.

The care product being provided by Guild Living would provide a suite of facilities and services designed to meet the needs of residents that require a level of support or care. The applicant states the provision, required by all residents, includes (but is not limited to):

- Time spent with the Guild Team to manage and arrange the delivery of prescription, medication, or food services specific to the individual needs.
- Time spent with the Guild Team to organise and facilitate visiting clinical care specialists or allied health professionals.
- Time spent with the Guild Team to plan and arrange home support which could include cleaning, laundry, and other domestic support.
- Access to Wellbeing facilities, services, classes, and expertise to support the prevention of health decline.
- Health or wellbeing checks, such as blood pressure, temperature, heart rate, and other health care indicators.
- Advice on health, including nutrition and other foundations of wellbeing, including physical exercise.
- Organised rehabilitation, following a hospital visit or health event.
- Additional organised care services are provided, such as GP Visits, with access to further levels of care available for all residents as and when required.
- Personal care assistance, aiding with mobilising, bathing, going to the toilet, dressing, eating or drinking.
- A 24-hour emergency response system which will provide:

- attendance at residence if required.
- comfort, reassurance, and peace of mind to residents.
- facilitate/greet/liaise with emergency services if called.

- Use of the transport services for trips out into the wider community.
- Advice, encouragement, and supervision relating to the above activities.

The care element would either be provided by Guild Living's in-house care service or an alternative care provided that is registered with Care Quality Commission (CQC).

Residents would have access to communal facilities that are fully integrated within the proposed development to foster communal living. This includes:

- A wellness centre (comprising gym space, flexible studio space, hydro therapy pool and consultation rooms);
- A restaurant/cafe, alongside a bar and flexible space for meetings and events;
- A resident's library and lounge area; and
- Outdoor amenity areas, comprising a rooftop garden (including a sensory garden), a community plaza (with spaces for socialising and seating) and communal landscaped gardens (including: spaces for sport activities, outdoor classes, picnic, reading, gardening and vegetable cultivation and relaxing).

The applicant seeks to provide a programme of community involvement which encourages communal living and seeks to combat loneliness. The applicant would offer a range of activities including exercise classes; book clubs; art and craft classes/ clubs; external speaker events including local groups to present; gardening clubs/ classes; days out/ events; cooking classes; and film/movie nights.

The communal facilities would be available to and can be accessed by all residents. The cost of the communal facilities will be included within the Monthly Membership Fee (MMF). The proposed MMF would be consistent with similar products in the Borough.

Following a review of consultee comments and several meetings with officers, the application has been amended and now proposes:

C2 Units

Type	**Studio**	**1 bed**	**2 bed**	**3 bed**	**Total**
Guild Living Residences	9	26	114	4	153
Guild Living Care Residences		5			5
Guild Care Suites		24			24
Total	9	55	114	4	**182**

Affordable Housing

Following a review of the independent review of the Financial Viability Appraisal (FVA) and the previously published report, the Applicant has agreed to a payment in lieu of affordable housing of £3,078,000.

Wellness Centre and Restaurant/Café/Commercial Unit

A wellness centre and a restaurant is located to front the main courtyard. It provides level access and the includes of a hydrotherapy pool. The restaurant/Cafe area is configured to provide an integrated offer and increased flexibility. A commercial unit is located at ground floor level which is accessed from the public courtyard.

Internal Access Road

The new internal access road moves traffic into the site via Harefield Road into a one-way system with traffic exiting onto Warwick Place. The internal access road is a shared space layout and serves to provide a vehicle route and pedestrian footpaths, parking spaces, minibus space and access into the various uses on the site.

Layout

The proposal comprises 2 L-shaped blocks that are positioned around a central courtyard and podium garden. The site will be accessed off Harefield Road leading to an internal service road situated behind the police station.

Block A is the south western block along Harefield Road which steps down in height to 3-storeys where it adjoins the suburban residential dwellinghouses.

Block B is the north eastern block backing onto the Penfield Estate/Lancaster Road. The northern, eastern and southern part of the blocks would be centered around the public plaza, accessed via the porte corchere/covered entrance which includes commercial and communal space at surface level and residences above. A communal garden is provided at podium level.

Scale/Height Massing:

The proposed development would be upto 7-storeys in height.

The western / southern block (Block A) fronting onto Harefield Road is 3 - 7-storeys in height with 3 - 5-storeys at the lower levels along Harefield Road. The north / eastern block (Block B) is 4-7 storeys. The proposal includes stepped massing across the development.

Appearance

The Harefield Road frontage would feature a mix of light and dark mortar red brickwork, reveals, set back bricks, Juliette balconies and planters.

The main elevation to the south (to the rear of the police station) is proposed to have a vertical appearance with a variety of brick patterns, metal spandrels and reveals. The upper floors and cores would be finished with metal cladding.

Amenity Space

476 sq.m of private amenity space is being provided through 32 balconies measuring 5 sq.m and 16 gardens.

2,677 sq.m of communal amenity space is being provided through the magistrates' garden situated to the north and the podium garden.

The development would also provide 852 sq.m of public open space at surface level.

Mobility Scooter Store

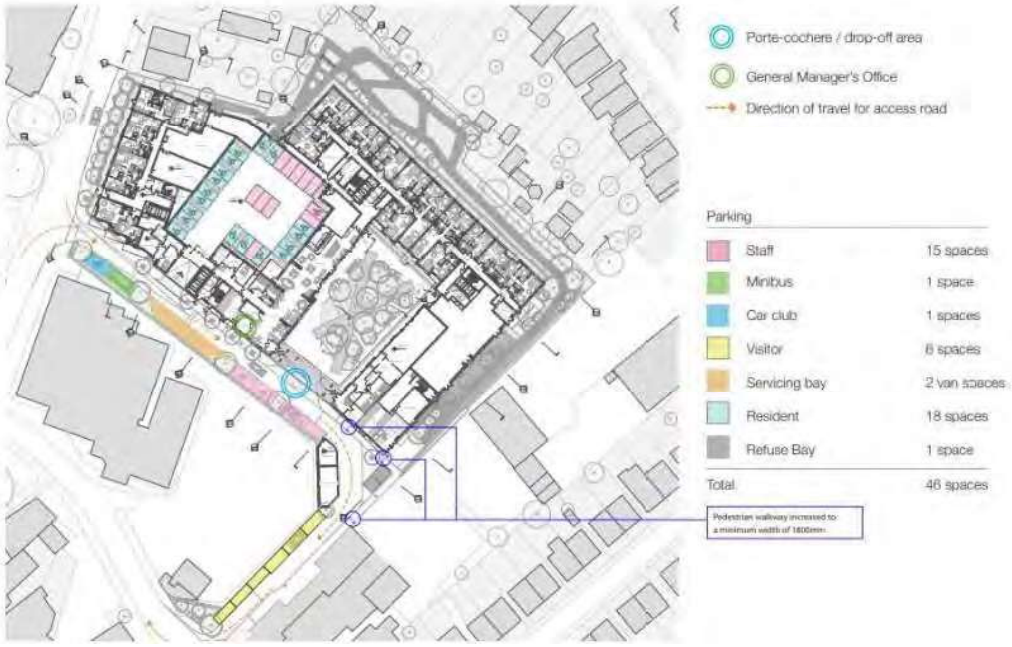
A mobility scooter store is provided at ground floor level accessed via the internal access road.

Car Parking

29 car parking spaces are provided under croft and 17 spaces at surface level. The reduction in the number of car parking space follows the publication of a previous report ahead of planning committee in April 2021. The current proposal directly addresses the policy and highways officers' objections to the scheme.

Fig. 1 below illustrates the distribution of the car parking spaces. A total of 18 disabled bays are provided for the residents. 15 spaces have been provided for staff/ carers / operational requirements (3 of which are accessible spaces). 6 visitor spaces are also provided at surface level. 2 dedicated servicing bays and 1 refuse bay are also provided. A minibus bay and a car club bay have been provided to promote shared car use and reduce the need for single occupancy vehicle trips where possible.

Fig. 1 – Car Parking Layout



The access road is a private road and the applicant proposes to manage and enforce it. All parking and vehicle movements are proposed to be controlled as part of a managed solution by the applicants.

Cycle Parking

76 cycle parking spaces are being provided of which 32 are secure long-stay spaces and 44 are short stay spaces.

Refuse and Recycling

The site would be managed, and collection is anticipated to take place twice weekly. A dedicated refuse pick up and drop off bay is provided to the east of the main entrance. Small refuse store has been relocated to prevent bins being wheeled through the central courtyard.

Trees and Landscaping

The existing site comprises 45 individual trees, 2 tree groups and 1 hedge. 37 trees and the hedge are of a poor quality. The proposed development would remove 27 trees to enable the development which are 'C' and 'U' grade trees, two of the trees proposed to be removed a 'B' grade trees, namely T26 and T39.

The proposal includes a central plaza, magistrates garden to the north east and a podium level public space. The proposal includes hard and soft landscaping scheme which is set out

in the Landscaping Strategy. The internal access road includes a shared surface with paving and tonal contrast to delineate between pedestrian and vehicular spaces.

3.3 Relevant Planning History

Under planning ref: 16299/APP/2018/1849 (21-03-19) planning permission was refused for the demolition of existing buildings and erection of 3 blocks (part 4, 5, 8, 9 and 12 storeys) to provide 267 self-contained units (32 x studios, 107 x 1- bedroom, 115 x 2-bedroom and 13 x 3-bedroom) with commercial floorspace at ground floor level (Use Classes A1, A2, A3 and B1) and associated landscaping, including public realm improvements, provision of 9 accessible car parking spaces and ancillary works. (Amendments include design changes and increase of 3 units).

The application was refused with 15 reasons listed:

1) The proposed development, by reason of its gated access and privately accessible ground floor uses, fails to have ground floor activities that provide a positive relationship to the surrounding streets or make a significant contribution to local regeneration. The proposal is therefore contrary to Policy H1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Emerging Policies DMHB 10 and DMHB 12 of the Local Plan: Part 2 - Development Management Policies (2015), Policy 7.7 of the London Plan (2016) and the National Planning Policy Framework.

2) The proposal, by reason of the scale of development and number of residential units proposed would give rise to an over-intensive use of the site with a density of development that would be out of keeping with and detrimental to the character of the area. Furthermore the scheme has an unacceptably low number of family units (3 bed or more) with many flats being single aspect. The proposal is therefore contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE13, BE19, H4 and H5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Emerging Policies DMH 2 and DMHB 17 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 3.4 of the London Plan (2016) and the National Planning Policy Framework.

3) The proposal does not make adequate provision for car parking in accordance with the Council's adopted standards. This is likely to result in on-street parking displacement to the detriment of highway and pedestrian safety. The proposal is therefore contrary to the Council's adopted policies in particular Policy AM14 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) and Emerging Policy DMT 6 of the Local Plan: Part 2 - Development Management Policies (October 2015).

4) The proposed development by reason of its height, bulk, mass and design represents an overdevelopment of the site that would have an adverse impact that fails to preserve or enhance the setting of the surrounding listed buildings, the Old Uxbridge/Windsor Street conservation area, surrounding locally listed buildings and the North Uxbridge area of special local character. The development would therefore be contrary to Policies BE1, SO1 and HE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies

BE4, BE13 and BE19 of the Local Plan: Part 2 (November 2012), Emerging Policies DMHB 1, DMHB 4 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015) and Policies 7.1, 7.4 and 7.6 of the London Plan (2016).

5) The development, by virtue of its overall scale, bulk of built development, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character or compliment the visual amenities of the street scene and local area and would mar the skyline contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE13 & BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Emerging Policies DMHB 10 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policies 3.5, 7.4 and 7.6 of the London Plan (2016) and the National Planning Policy Framework (2018).

6) The proposal, by reason of its scale, mass and design is considered to result in overdominance and have a detrimental impact on the residential amenities of existing residential properties, thus failing to accord with Policies BE19 and BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), the Council's Supplementary Planning Document 'Hillingdon Design and Access Statement' (HDAS), Emerging Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 3.5 of the London Plan (2016) and the National Planning Policy Framework.

7) The proposed scheme fails to provide amenity space of sufficient size, level and quality commensurate to the scale and level of development proposed, resulting in an over-development of the site detrimental to the residential amenity of future occupiers. As such the proposal would provide a substandard form of accommodation for future residents contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE20 and BE23 of the Hillingdon Local Plan: Part Two - UDP Saved Policies (November 2012), Emerging Policies DMHB 10 and DMHB 18 of the Local Plan: Part 2 - Development Management Policies (October 2015) and the adopted Supplementary Planning Document - Residential Layouts SPD (2006).

8) The proposed development by reason of its layout and design fails to provide sufficient outlook and privacy for future occupants of the proposed buildings resulting in a development that is detrimental to the amenity of future occupiers of the site. The development would therefore be contrary to Policies BE20, BE21 and BE24 of the Local Plan: Part 2 (November 2012) and Policy 7.1 of the London Plan (2016).

9) The proposed drainage strategy fails to demonstrate that surface water run off is controlled to ensure the development does not increase the risk of flooding. This is contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Emerging Policies DMEI 9 and DMEI 10 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 5.12 Flood Risk Management, Policy 5.13 Sustainable Drainage and Policy 5.15 Water use and Supplies of the London Plan (March 2016) and the National Planning Policy Framework.

10) The proposed development, by reason of the waste arrangements, has failed to demonstrates that waste can be collected in an acceptable manner and that the residential amenity of future residents would not be detrimentally impacted upon. As such it is deemed to be contrary to Policy EM11 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE19, BE20, BE21 and BE23 of the Local Plan: Part 2 (November 2012), Emerging Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), London Plan Policy 5.17 and HDAS - New Residential Layouts.

11) The development fails to satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, contrary to Policy PT1.EM1 of Hillingdon Local Plan Part 1, Emerging Policy DMEI 2 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policies 5.2, 5.13 and 5.15 of the London Plan (2016) and the National Planning Policy Framework.

12) The proposed scheme fails to retain existing trees that are deemed worthy of protection or proposed measures to mitigate against the loss of these landscape features of merit. In addition the level of soft landscaping proposed is deemed to be minimal and insufficient to mitigate the urbanising impact of the development. The scheme therefore fails to satisfy Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), saved policy BE38 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) and Emerging Policies DMHB 11, DMHB 12 and DMHB 14 of the Local Plan: Part 2 - Development Management Policies (October 2015).

13) The proposed development has failed to justify the loss of the existing retail capacity and to demonstrate that options for optimising and enhancing the provision of retail floorspace as part of a mixed-use scheme have been considered. As such the proposal has failed to protect and enhance the role of Uxbridge as a Metropolitan town centre. As such it is deemed to be contrary to Policy E4 of the Local Plan: Part1 - Strategic Policies (2012), Policy 4.8 of the London Plan (2016) and Annex 2 of the NPPF (2018).

14) The submitted Daylight and Sunlight report states that 27% of the proposed units fail daylight requirements in accordance with BRE guidelines. In addition the application has failed to provide evidence that the proposed amenity areas accord with BRE daylight, sunlight and overshadowing standards as well as details of microclimate for the proposed development. As such the proposal is contrary to Policies BE19,BE20, BE21 and BE23 of the Local Plan: Part 2 (November 2012), Emerging Policies DMHB 10 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015) and the National Planning Policy Framework(2018).

15) The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Public Realm Works, Travel Plans, Construction Training, Carbon Offset, Affordable Housing, Secure by Design and Project Management and Monitoring). The scheme therefore conflicts with Policy R17 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Emerging Policy DMCI 7 of the Local Plan: Part 2 -

Development Management Policies (October 2015) the adopted Supplementary Planning Document 'Planning Obligations and Policy 8.2 the London Plan (2016).

The current application differs from the previously refused scheme. It seeks to provide specialist older persons accommodation (Use Class C2).

PENFIELD INDUSTRIAL ESTATE

A live application is being considered on the adjacent Penfield Industrial Estate under planning ref: 21682/APP/2020/3608 for the redevelopment of site to include a two storey building comprising 4 x 1-bed self-contained flats, and 3 x Use Class E building units including parking and landscaping.

4. PLANNING POLICIES AND STANDARDS

PT1 Policies

PT1.BE1 (2012) Built Environment
PT1.CI1 (2012) Community Infrastructure Provision
PT1.CI2 (2012) Leisure and Recreation
PT1.CI3 (2012) Culture
PT1.E1 (2012) Managing the Supply of Employment Land
PT1.EM1 (2012) Climate Change Adaptation and Mitigation
PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM3 (2012) Blue Ribbon Network
PT1.EM4 (2012) Open Space and Informal Recreation
PT1.EM5 (2012) Sport and Leisure
PT1.EM6 (2012) Flood Risk Management
PT1.EM7 (2012) Biodiversity and Geological Conservation
PT1.EM8 (2012) Land, Water, Air and Noise
PT1.EM11(2012) Sustainable Waste Management
PT1.H1 (2012) Housing Growth
PT1.H2 (2012) Affordable Housing
PT1.HE1 (2012) Heritage
PT1.T1 (2012) Accessible Local Destination
PT1.T2 (2012) Public Transport Interchanges

Part 2 Local Plan Policies

DMCI 3 Public Open Space Provision
DMCI 4 Open Spaces in New Development
DMCI 7 Planning Obligations and Community Infrastructure Levy
DMEI 1 Living Walls and Roofs and Onsite Vegetation
DMEI 10 Water Management, Efficiency and Quality
DMEI 11 Protection of Ground Water Resources
DMEI 12 Development of Land Affected by Contamination

DMEI 14 Air Quality
DMEI 2 Reducing Carbon Emissions
DMEI 3 Decentralised Energy
DMEI 9 Management of Flood Risk
DMH 2 Housing Mix
DMH 7 Affordable Housing
DMHB 1 Heritage Assets
DMHB 10 High Buildings and Structures
DMHB 11 Design of New Development
DMHB 12 Streets and Public Realm
DMHB 14 Trees and Landscaping
DMHB 15 Planning for Safer Places
DMHB 16 Housing Standards
DMHB 17 Residential Density
DMHB 18 Private Outdoor Amenity Space
DMHB 4 Conservation Areas
DMT 5 Pedestrians and Cyclists
DMT 6 Vehicle Parking
DMAV 1 Safe Operation of Airports

London Plan 2021

LPP D1 London's form, character and capacity for growth
LPP D11 Safety, security and resilience to emergency
LPP D12 Fire safety
LPP D13 Agent of change
LPP D14 Noise
LPP D2 Infrastructure requirements for sustainable densities
LPP D3 Optimising site capacity through the design-led approach
LPP D4 Delivering good design
LPP D5 Inclusive design
LPP D6 Housing quality and standards
LPP D7 Accessible housing
LPP D8 Public realm
LPP D9 Tall buildings
LPP DF1 Delivery of the Plan and Planning Obligations
LPP E9 Retail, markets and hot food takeaways
LPP G1 Green infrastructure
LPP G5 Urban greening
LPP G6 Biodiversity and access to nature
LPP G7 Trees and woodlands
LPP GG1 Building strong and inclusive communities
LPP GG2 Making the best use of land
LPP GG6 Increasing efficiency and resilience
LPP H10 Housing size mix
LPP H13 Specialist older persons housing

LPP HC1 Heritage conservation and growth
LPP S1 Developing London's social infrastructure
LPP S3 Education and childcare facilities
LPP SD6 Town centres and high streets
LPP SI1 Improving air quality
LPP SI12 Flood risk management
LPP SI13 Sustainable drainage
LPP SI3 Energy infrastructure
LPP SI4 Managing heat risk
LPP SI5 Water infrastructure
LPP SI7 Reducing waste and supporting the circular economy
LPP SI8 Waste capacity and net waste self-sufficiency
LPP T2 Healthy Streets
LPP T3 Transport capacity, connectivity and safeguarding
LPP T4 Assessing and mitigating transport impacts
LPP T5 Cycling
LPP T6 Car parking
LPP T6.1 Residential parking
LPP T6.5 Non-residential disabled persons parking
LPP T7 Deliveries, servicing and construction
LPP T9 Funding transport infrastructure through planning

ADVERTISEMENT AND SITE NOTICE

Advertisement Expiry Date: 28-05-2021

Site Notice Expiry Date: 30-11-2021

6. CONSULTATIONS

6.1 EXTERNAL CONSULTEES

The application has been advertised under Article 8 of the Town and Country Planning General Development Procedure Order 1995 as a Major Development. 1317 surrounding property owners/occupiers have been consulted during the course of this application.

05-11-20 and 05-12-2020. A site notice was displayed, and the proposal was advertised in the press. 50 responses were received which included 25 letters of objections, 18 letters of support and 7 comments.

Amended plans were consulted on between 11-03-2021 and 25-03-2021. 27 responses were received which included 13 letters of objections, 4 comments and 10 letters of support.

A valid petition was also received with 157 signatures in support of the application.

Further amendments were consulted upon between 10-05-2021 and 28-05-2021 to which 9 objections, 1 comment and 2 letters of support were received.

OBJECTIONS

Land Use

- Objection to the loss of the existing retail units. The loss of Halfords and Wickes would require local residents to travel further to access the goods and services provided by the existing shops making access to these goods and services unsustainable for existing residents and businesses.
- Objections to loss of retail jobs for local residents.
- Objections to the provision of cafes, restaurants and gyms.
- The site is not the right location for this type of development.
- The number of new apartments is unsustainable.
- The space for the nursery could be better used for a health centre.
- The development does not provide social housing.
- The proposal would result in increased pressure on public services.
- There is insufficient demand for this type of facility in the local area, there are currently vacant independent living facilities that are vacant in Uxbridge, Cowley and Ruislip.
- The units will not be affordable for the majority of local residents and the development would attract elderly residents from a wider area.
- The on-site cafe, restaurant and gym, this is likely to take trade away from Uxbridge town centre.
- Objections to the lack of contribution the development would make to the local economy and that most jobs created are likely to be minimum wage.
- Despite the in-house care available, the result could be a net increase of elderly people living in the Borough calling upon medical and social services which are already under severe pressure.
- The in-house care component of the proposal is inadequate and does not address the issue of elderly people with multiple medical needs.

Design

- Concerns relating to the scale and height.
- Concerns relating to the quantum of development proposed.

- The proposal would have a harmful visual impact.
- The proposal is out of keeping with the suburban residential character of this part of North Uxbridge.
- The tower also blights what is predominately a residential area.
- The site is on the extreme edge of the town and the height of the buildings change the balance of the town's sky line.
- It is not necessary to include one block of 8 storeys in height for a later living environment.
- A lower building mass is more appropriate for both future residents and to the greater amenity of North Uxbridge.
- The building should be reduced to 4 storeys.
- This is an over-intensive use of the site and fails to preserve or enhance the setting of the surrounding listed buildings, the Old Uxbridge/Windsor Street conservation area, surrounding locally listed buildings and the North Uxbridge area of special local character.
- The proposed 7 storey building is too high for this location.
- The proposal is an overly dense development out of keeping with the character of the area.
- The proposal would result in the overcrowding of North Uxbridge.
- The proposal, due to its layout and design would compromise security at the adjacent police station.

Amenity

- Concerns relating to the impact of the proposal on daylight and sunlight.
- The proposal would result in overlooking into neighbouring properties.
- The proposal would have an overbearing impact on the amenities of neighbouring properties.
- Concerns about the increase in noise and disturbance.
- The proposal would create deep shadows.
- The buildings will reduce the sunlight and amount of visible sky, particularly in the winter months.
- The proposal would result in the loss of light.
- The proposal would impact one's ability to dry their laundry outdoors.
- Concerns relating to noise and disturbance during the construction period, the proposal would impact one's ability to work from home.
- Concerns the proposal will breach neighbouring fences.

Highways

- Insufficient car parking is provided.
- There is insufficient car parking available for visitors.
- No car parking provision have been made available for visitors to the wellness centre, restaurant, cafes and nursery.
- The proposal would displace car parking onto Harefield Road and surrounding streets.
- Concerns relating loading and unloading.
- The proposal would contribute to further congestion in Uxbridge.
- With the number of proposed residents, visitors, healthcare staff and deliveries, traffic and the requirement for parking is likely to increase.

- A car free development is unrealistic, to expect carers, visitors, residents and the workforce to use only public transport would not work in practice.
- Residents parking schemes are likely to be abused.
- There is already considerable pressure put on local parking facilities provided by Hillingdon Council to residents in the parking code area 'U1'.
- There are serious concerns over the safety and impact that vehicles would have at the location regarding the nursery element.
- Concerns that elderly residents are unlikely to forgo use of their cars.
- The proposed ratio of car spaces at 1 per 2.43 dwellings is far too small and needs at least to be doubled to be realistic.

Agent of Change

- Concerns relating to the impact of the development on the neighbouring Penfield Industrial Estate. The whole of the western boundary of Penfield Estate adjoins the subject planning application site. The introduction of significant noise sensitive residential uses immediately adjacent to the existing, lawful noise-generating employment uses at Penfield Estate will introduce the potential for complaints by residents in respect of these established industrial uses.

Sustainability

- It is unclear what green infrastructure and energy saving measures are proposed.
- Environmental concerns should prioritise retaining such shops in the local area rather than requiring locals to travel several miles to obtain services available at Halfords and Wickes.

Other Matters

- The local sewerage system is not capable of accommodating the scale of development proposed.
- The electricity supply is prone to breakdown in North Uxbridge is prone to breakdown during the winter months.
- The proposal would impact the value of neighbouring properties.
- Rights of light.

COMMENTS

- No objection in principle to the development or the innovative approach taken to enable older residents to downsize.
- Any proposal at this site should be no more than 6 storeys in height.
- A car parking management scheme would need to be introduced along Harfield Road and surrounding streets.
- The car parking stackers are a good solution for car parking for elderly residents, the quantum should be increased.
- This is a better scheme than the previous application and the concept of the Guild Living scheme is positive, however there are reservations about its scale.

- The sensitive approach taken by the applicant is welcomed as is the scheme, however the loss of the existing retail units would have an impact on the retail offering in this part of Uxbridge and the 8-storey building appears to be too high for the area.
- Gyms over 500 sq.m are struggling in Uxbridge.

SUPPORT

The letters of support included letters from the Hillingdon Chamber of Commerce, Monkey Puzzle Nursery, Hillingdon Carers and Wellbeing Services. The letters of support are summarised below:

- Existing nursery is at full capacity with an eight-month waiting list. There is a huge demand for quality nurseries within the Uxbridge area. Support for a children's day nursery within a later living community.
- Hillingdon carers support the proposal which include some excellent facilities planned for the site.
- Hillingdon Chamber of Commerce consider the proposed development will be a great use for the site so close to the town centre and it will help boost the town centre through increasing footfall and spending and helping local businesses in the process.
- Support the plans to significantly enhance the area with new green spaces where residents and members of the public can relax. This would be a great way to encourage interaction between residents and visitors, something which is clearly at the heart of Guild Living's proposals.
- Impressed by the openness of their proposed later living community and look forward to using their facilities, such as the Wellness Centre, restaurant and library.
- Guild's proposed care services for Uxbridge will also help reduce pressure on the Hillingdon Hospital and other local NHS and Council services - especially given the town's ageing population.
- This scheme will help encourage downsizing and free up housing stock for families, in turn freeing up affordable housing for first-time buyers.
- Guild's attitude towards how we should age is truly unique and focuses on reinstating older people at the heart of our communities, helping to tackle the loneliness that many older people are experiencing.
- This scheme will benefit both those looking to live here, as well as the local community.
- Support the variety of high-quality homes for older people, from one-bed apartments to three-bed villas.

NORTH UXBRIDGE RESIDENTS ASSOCIATION - MARCH 2021

- These comments are supplemental to those made by North Uxbridge Residents Association on the original Guild Living Planning Application. NURA expressed support for the Application, but with reservations mainly concerning the height of the 8 storey block. Since that time NURA has held discussions with Guild and we are pleased to note that Guild have now taken our concerns on board in the amended Application by:
- Reducing the height of the tallest building from 8 to 7 storeys by reducing the number of apartments from 194 to 182.

- Removing a top part of the building along Harefield Road to create stepped massing up to 5 storeys.
- Setting back the building, offering space for landscaping and tree planting along Harefield Road.

NURA supports the amended Planning Application, without qualification.

PETITIONS

A petition was received in March 2021 with 157 valid signatures. The petition supports the delivery of a new nursery as part of the proposed development.

STATUTORY CONSULTEES

Denham Parish Council - March 2021

There will be public retail, nursery and gym with little or no parking. DPC has strong concerns on the impact of the local road network in particular the A4020 to the M40 through New Denham which is not considered on the travel plan.

Buckinghamshire Council

This Council has considered the above application and raises NO OBJECTION to the application subject to your authority ensuring that the proposal complies with all relevant policies contained in the adopted Development Plan and guidance contained in the National Planning Policy Framework.

Environment Agency

We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in our Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals. The previous land use at this site suggests the potential presence of contamination. Since the site is situated on a principal aquifer these proposals need to be dealt with in a way which protects the underlying groundwater. Please therefore take note of the following advice. Where land contamination may be an issue for a prospective development, we encourage developers to employ specialist consultants/contractors working under the National Quality Mark Scheme.

Natural England

Natural England has no comments to make on this application.

GLAAS

NPPF Section 16 and the Draft London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The planning application lies in an area of archaeological interest. The applicant's archaeological desk-based assessment shows that remains of a Bronze Age settlement and land boundary ditches were found during an investigation conducted in 1993-4. These are part of an extensive Bronze Age landscape covering much of the Lower Colne Valley. There appears to be a trackway aligned on the natural crossing point over the Colne at the site of the medieval bridge. The eastern and central parts of the site were investigated, and ground levels subsequently reduced so there is very limited potential in these areas. However, the western part of the site was not investigated and may have greater surviving potential. Any surviving remains would be harmed by the proposed new build.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

NPPF paragraphs 185 and 192 and Draft London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. A condition and informative is recommended.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Stage 1 of the proposed condition would involve trial trenching in the western part of the site to establish what buried remains survive. If significant survival is demonstrated then an open area excavation is likely to be necessary in the affected area under stage 2 of the condition before development commences.

Heathrow Aerodrome Safeguarding

No safeguarding objections to the proposed development. However, we would like to make the following observation:

Construction Aviation Warning Lights

Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or Radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omni-directional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane.

Ministry of Defence

The application site falls within the aerodrome height and birdstrike statutory safeguarding zones surrounding RAF Northolt, lying approx. 3.8km West from the centre of the airfield.

Aerodrome Height safeguarding zone

The proposed development site occupies the statutory height safeguarding zone which ensures air traffic approaches are not impeded. The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre. Having reviewed the proposal, I can confirm the MOD has no concerns regarding the height of the proposed development.

Birdstrike safeguarding zone

The principal concern of the MOD with this development is the proposed flat green roofs including roof gardens, sedum and wildflower roofs. Flat roofs have the potential to attract and support breeding large gulls, therefore the MOD recommend a flat roof Bird Hazard Management Plan (BHMP) be put in place to prevent the breeding of large gulls, as follows:

The BMP should make a provision for the site managers/maintenance to undertake or organise bird control (using appropriate licensed means) which would address any population of gulls or other bird species occupying the flat roofs which are considered by the MOD to be a hazard to air traffic using RAF Northolt, to disperse as many as necessary in order to prevent them from successfully breeding at the site. To facilitate this, it will be necessary to ensure the roofs are accessible for personnel engaged in the bird control activities.

Cranes

The MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect the performance of air traffic safety. If the redevelopment of this site does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures.

The MOD would request that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

Submission of a Construction Management Strategy- Subject to the above conditional requirements being implemented as part of any planning permission granted, the MOD maintains no safeguarding objection to this application.

NATS

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

Thames Water

Waste Comments
Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments
With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Greater London Authority

London Plan policies on retail and town centre uses; housing supply; specialist housing for older people; housing and affordable housing; urban design; residential quality; density; heritage; inclusive access; energy; sustainable urban drainage; urban greening and trees; and transport are relevant to this application. The application does not comply with the London Plan, as set out below:

Principle of development: The principle of the proposed residential-led mixed use redevelopment of this underutilised town centre site to provide specialist housing and care

home accommodation for older people is supported and accords with London Plan and the Intend to Publish London Plan.

Housing and affordable housing: The application does not provide any on-site affordable housing. Instead a £2 million cash in lieu payment is proposed. Exceptional circumstances to justify off-site affordable housing provision have not been demonstrated. No detail has been provided of the affordable housing the proposed cash in lieu payment would provide and how it would be spent to ensure delivery within an agreed timescale. The principle of a cash in lieu payment is therefore not currently supported. The applicant's Financial Viability Appraisal (FVA) is being scrutinised to ensure that the maximum viable contribution towards affordable housing provision is provided. Early and late stage viability review mechanisms are required.

Urban design and heritage: The design, layout, height and massing is supported. The residential quality does not fully comply with the standards in the Intend to Publish London Plan. However, a degree of flexibility could be acceptable given the specialist nature of the housing proposed. The application would cause less than substantial harm to a number of designated heritage assets which must be clearly and convincingly outweighed by public benefits associated with the application.

Climate change: The energy, drainage and urban greening strategies are supported. The loss of trees is justified and could be appropriately mitigated. An urban greening factor assessment should be provided.

Transport: The residential car parking is excessive given the town centre location and PTAL (5). This should be reduced. Cycle parking for the specialist housing for older people does not comply with the minimum standard in the Intend to Publish London Plan and should be increased. The design of cycle parking should comply with the London Cycle Design Standards. Healthy streets and active travel zone improvements should be secured. The trip generation assessment should be revised.

Transport for London

The following areas require further work:

· The inclusion of general residential car parking is unacceptable and not compliant with Publication London Plan Policy T6. A car club should be considered in lieu of lieu general parking.
· Blue Badge car parking should be prioritised from the outset.
· Cycle parking should be provided in line with the minimum standards (Publication London Plan Policy T5) for residential developments.
· The design of the cycle parking should comply with the London Cycle Design Standards.
· The proposed footway running through the site should be widened to safely accommodate the expected level of pedestrian trips.
· The trip generation assessment should be revised to reflect the site location, PTAL and policy-compliant level car parking.

· The applicant should undertake a robust assessment of the impacts on the local public transport, walking and cycling networks to accord with Publication Policy T4.

I trust this provides you with an understanding of our current position on this application. Please do not hesitate to contact me should you have any queries.

NHS London Healthy Urban Development Unit

The NHS Healthy Urban Development Unit's (HUDU) Planning Obligations Model has been used to assess the cost of mitigating the direct impacts of the proposed development on the local health infrastructure in line with the NPPF and PPG, the London Plan and LB Hillingdon's policies.

The assessment is based on the number of units in the application (182) and the average age of the new residents being 77 as advised in the supporting information to the application. This places residents in the 75- 84 age range within the model. The capital cost for mitigation is calculated as £900,229 with greater revenue costs which will have to be found by the NHS.

The application advises that the development will enable larger homes to be released on to the market for families and that there is both local need and demand within the borough for the proposed extra care units.

The HUDU Model is a recognised and accepted methodology for calculating the contribution required to mitigate the impact on health from new development. The London Plan (March 2021 Chapter 11) states that boroughs should use the HUDU Model to calculate the contribution sought from developers to mitigate the impact of their development on health. The approach conforms with the NPPF and planning practice guidance regarding developer contributions.

6.2 INTERNAL CONSULTEES

Access Officer - revised comments (March 2021)

Further to a review of Drw number: 624_P_00_100, rev P11, dated 10/3/21, I can confirm the following:

1. The Wellness Centre is now located on the ground floor and can be accessed at street level, thus eliminating the need for platform lift access.
2. The dedicated mobility scooter room provides parking for 18 vehicles, with a further 2 spaces provided within the cycle store.This latest plan overcomes the previous accessibility objections and no new concerns are raised.

Conclusion: Acceptable from an accessibility aspect.

Officer comment: The Access Officer has worked extensively with the applicant to ensure that the plans address accessibility issues, by virtue of the nature of the development, the

development is designed to meet accessibility needs of its future occupants. It is for this reason accessibility related conditions are not required as the plans themselves fully address accessibility matters.

Housing Officer (March 2021)

A commuted sum should be acceptable on the Harefield Road site given the unique housing that is proposed. I trust the specialist FVA appraisal will robustly review the FVA.

Air Quality Officer (March 2021)

The proposed development is located with the Uxbridge Focus Area, bringing traffic and energy production emissions which will add to current levels of air pollution. As per the London Plan (2021), developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

The LBH Air Quality Action Plan 2019-2024 has been produced as part of the LA duties to manage local air quality. It includes measures that address the requirement to improve air quality within Focus Areas.

Per definition, Focus Areas are areas where current air pollution levels are unacceptable and current measures are not sufficient to reduce exposure and safeguard public health. Therefore, within Focus Areas, and as per the LBH Local Action Plan, a more stringent application of mitigation is required (measure 5). Given that current levels of emission are unacceptable in Focus Areas, new developments are evaluated by LBH not in relation to the existing use, but in relation to the total level of emissions they originate within the Focus Area so that the suitable level of mitigation required is ascertained.

The operation of the proposed development originates 679 daily LDV trips which is a significant level of traffic circulating in the already congested Uxbridge Focus Area. In addition, the proposed development will include a diesel fuel oil emergency generator, which, as widely known across London Boroughs, can produce significant levels of pollution. As per the LBH Local Action Plan, these emissions are required to be mitigated. The updated air quality addendum mentions the applicant is considering to apply SRC (Selective Catalytic Converter) to the diesel backup generator with a 75% removal efficiency; this is to be secured via a condition.

As indicated by LBH during consultation, given the sensitive location of the application site in terms of air quality, GLA's Guidance on Neutral Assessment for C2 use provided on Table 12 of the document should be used. Table 12 of the guidance (Table 12:Transport Emissions Benchmark (TEB) approach for each Land-use Category, page 22) recommends uses C3/C4 to be used to derive a Transport Emission Benchmark, rather than the generic alternative approach used by the applicant. Following GLA's guidance and using trip generation rates reported in the Transport Assessment Addendum per land used proposed, the proposed development is not air quality neutral for transport emissions for the C2 and D1 uses proposed. LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024),

namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan (March 2021) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

DAMAGE COST AND MITIGATION MEASURES

The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach. The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied.

The level of mitigation required to the proposed development for traffic emissions is £75,107. Once all deductions were applied, the remaining value of mitigation due is £63,841. Flat rate deductions applied are as follow: Travel Plan (10%), Green Measures (5%).The level of mitigation required due to the proposed diesel backup generator emissions is £5,421, assuming the diesel backup generator will operate in average 100 hours per annum and that SCR with 75% efficiency removal is fitted. Therefore, a section 106 agreement with the LAP of £69,262 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

In addition, two Air Quality conditions are required to develop and implement a Low Emission Strategy and manage construction emissions as required by the Mayor of London.

Conservation and Design Officer - March 2021

The amended drawings / visuals show an improvement to the Harefield Road frontage with the building line being set back a further 2 metres. This has helped to lessen the development's dominance on the street frontage as well as reduce its imposing presence on the neighbouring houses (nos. 14-16 Harefield Road). The proposals now allow for more landscaping to the front of the building and helps to provide a more satisfactory transition to the suburban houses directly to the north.

The setback will also allow for more substantial street trees, adequate pavement widths as well as additional landscaping to help improve and soften the developments setting.

The kinetic views video along Harefield Road is useful in appreciating the impact of the development from the more immediate street frontage. It would be useful if the footage started further along Harefield Road to the north so that the development can be appreciated in slightly longer views. There are still some concerns with the height and bulk of the blocks that rise up to the rear above the predominantly 2-3 storey suburban townscape (View H of the Heritage, Townscape and Visual Impact Assessment).

Given the context it is considered that the 7 storeys to Block A is still a storey to high given that the land rises from Harefield Road and would benefit from one of the floors being removed.

The reduction in height and massing of Block B is also an improvement and has helped to lessen the impact of the development on this part of the townscape. This is also illustrated within the footage taken along Press Road and View I of the Heritage, Townscape and Visual Impact Assessment and allows the development to sit more comfortably within these views.

The amendments to the blocks have also helped (View K of the Heritage, Townscape and Visual Impact Assessment) to reduce the impact on the conservation area and listed buildings and the impact on these heritage assets are now considered acceptable.

Should the application be minded for approval then I would suggest the following conditions:

- Samples of all external finishing materials.
- Sample panels of brickwork be constructed on site showing the colour, tone and texture of the brick, the brick bonding pattern, mortar colour and joint finish.
- Details of hard and soft landscaping Details of parapets, brickwork surrounds.
- Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority.

CONSERVATION AND DESIGN OFFICER – MAY 2021

The application has made the following amendments:

1. Removal of all car stackers and managed car parking arrangement.
2. Revision to the layout and configuration of car parking layout providing a policy compliant level of parking for future occupants.
3. Reconfiguration of access road parking to include an additional dedicated loading bay.
4. Restriction of the Class E unit to prevent nursery use and associated requirement for drop-off parking arrangement; and
5. Provision of additional staff/carer parking.
6. Provision of a car club space.
7. Increased pedestrian walkway width to a minimum width of 1800mm.The amendments relate to the improvement of parking and the access road for which Highways would be in a position to provide comments.

The rest of the scheme is essentially the same as the previous iteration and as such still raises design concerns. I would therefore refer you to my original comments.

Contaminated Land Officer - summary comments (March 2021)

Having reviewed further information provided within the correspondence from Tier Environmental Ltd I am now satisfied that the details concur with the conditions that I recommended to be imposed.

I am also satisfied the proposed course of actions, as listed in the tabulated details (Table 1.2) within the correspondence, will be suitable to address the earlier identified objections and thereby ensure the land will be made suitable for the proposed change of use

However, in order for the LPA to be suitably reassured that the proposed work will be conducted and reported in an appropriate manner, I am continuing to recommend the same proposed conditions for land affected by contamination are imposed accordingly.

Flood Water Management Officer

No objection in principle to the development based on the submitted information. A Flood Risk Assessment (Tier Environmental Report Reference TL/1306/FRA Revision 1.3 Dated 03/08/2020) has been submitted to support the application. The conclusions reached in the FRA are agreed with and the risk of flooding at the site is considered to be low. It is noted that the Flood Risk Assessment does not reference the relevant Local Plan Part 2 Development Management Policies (Adopted January 2020), such as DMEI 1, DMEI 10 etc; however this does not change the outcome of the assessment. A Drainage Strategy (Tier Environmental report reference 913-TSY-ZZ-XX-RP-C-1001 revision 007 dated 16/09/2020) has been submitted to support the application. The Drainage Strategy is considered to be appropriate for this stage of design and acknowledges the information that is required to undertake the detailed design. Most notably, confirmation of the existing and proposed discharge point from the surface water drainage network. It is noted that previous application have sought to discharge into the highway drainage which is not appropriate, however this application assumes that a new connection into the Thames Water surface water ewer in Harefield Road would be required. The outline drainage strategy includes green roof areas, rainwater harvesting, permeable paving and integration with the soft landscaping which should be retained during detailed design. The detailed design of the drainage system should be secured by way of a suitable surface water management condition.

Summary of Health and Social Care Comments - February 2021

Concerns raised regarding potential adverse impacts on social care budgets as a result of the applicant's business model:

Summary of applicant's response to care health and social care comments - February 2021:

The development has been designed to provide integrated level of care and support to future occupants. It includes extensive amenities for future residents and provides an environment that allows residents to live independently with the right level of support to meet their care needs.

The applicant estimates that there are 5,133 eligible households in LBH who have capital to move into the development.

Officer comment: The impacts on social care from this scale of development are very complex and officers consider existing planning policies are more orientated to considering affordable housing impacts than whether the benefit does or does not have positive social care impacts. Affordable housing impacts are explained in detail elsewhere in the report.

Highways Officer - May 2021

The proposal as originally submitted included 76no. managed stacker car parking spaces, these were provided for the residents to use. All 76no. of these car parking spaces have now been removed, those that would have had somewhere to park must now satisfy their daily travel needs by alternative modes. The applicant considers this realistic given that the site benefits from good access to public transport as indicated by a PTAL ranking of 5, Uxbridge underground and bus station are within a reasonable walking distance. However, the trip between the application site and Uxbridge underground and bus station requires that pedestrians cross Belmont Road using the pelican crossing by Barclays Bank and WH Smiths. This pelican crossing is situated on a bend and the carriageway is up to 12 meters wide, as a result it takes pedestrians typically longer than normal to cross the road. The Mayor's Transport Strategy has a goal that, by 2041, all deaths and serious injuries will be eliminated from London's transport network and new development such as 170 Harefield Road are expected to contribute towards the attainment of the Vision Zero goal. To improve the safety and convenience with which those residents without access to car parking can walk to Uxbridge underground and bus stations a developer contribution is required to fund the provision of Pedestrian Countdown facilities at the Belmont Road crossing. This road safety measure is supported by Transport for London. Pedestrian Countdown show pedestrians how long they have available to cross the road, such a facility will be of particular benefit to the residents of Harefield Road as the development that would provide '*later living*' accommodation.

There is no objections to from the Highways Authority subject to the inclusion of conditions and Section 106.

Planning Policy Officer - December 2020

Loss of retail

The site, which falls within Use Class E is located within Uxbridge Metropolitan Town Centre, outside of the primary and secondary shopping areas. Part D) of Policy DMTC 2 of the Hillingdon Local Plan: Part Two (2020) states that outside of defined primary and secondary areas, proposals for a change of use from retail will be permitted, provided the change does not result in the loss of an essential local service. The retail stores and associated parking currently occupying the site include a large hardware/DIY/materials store (Wickes) and a large bicycle/car parts store (Halfords), neither of which are considered to be essential shops as defined by paragraph 3.14 of the Hillingdon Local Plan: Part Two (2020).

The primary function of Part D of Policy DMTC 2 is to protect essential shops and the current uses on site are not considered to be essential shops.

Older Persons Housing and Care Home Accommodation

The applicant is proposing three different types of accommodation as part of this scheme, which would broadly fall into the following three categories:

- Guild Living Residences - Sheltered accommodation -161 units
- Guild Care Residences - Extracare accommodation -26 units
- Guild Care Suites - Care home -7 units

Demand

There is an identified need for specialist housing for older people identified in Hillingdon's 2016 Strategic Housing Market Assessment (SHMA). The Intend to Publish Version of the London Plan also states annual borough benchmarks for provision of specialist older persons housing for boroughs to take account of when determining provision of specialist housing for older people in the borough. Hillingdon's annual benchmark is set at 180 units per annum up to 2029. The Intend to Publish Version of the London Plan has also identified a need for care home accommodation however this is a London-wide estimate of 867 care home beds a year.

The accommodation provided would fall within the NPPF and London Plan definition of 'sheltered' and 'extra care' accommodation for which there is greater demand than residential care accommodation.

Policy DMH 8 of the Hillingdon Local Plan: Part Two (2020) states that the development of residential care homes and other types of supported housing will be permitted provided that:

-it would not lead to an over concentration of similar uses detrimental to residential character or amenity.
- It caters for a need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;
- The accommodation is fully integrated into the residential surroundings; and
- In the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport. The proposal is unlikely to lead an over concentration of similar uses within the immediate area and being an edge-of-centre location it is in close proximity to shops, community facilities and is easily accessible by public transport.

There is also an identified need for this type of development as mentioned above. The policy also states that proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). Policy H13 of the Intend to

Publish Version of the London Plan states that specialist older persons housing should deliver:

- Affordable housing in accordance with borough and London Plan policies (Policies H4 and H5), which in the case of Hillingdon would equate to a minimum of 35% of homes to follow the fast-track route;
- Accessible housing in accordance with Policy D7 of the London Plan;
- The highest standards of accessible and inclusive design in accordance with Policy D5;
- Suitable levels of safe storage and charging facilities for residents' mobility scooters;
- Pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs) minibuses and ambulances. 161of the 194 proposed units would qualify for application of Policies H4 and H5 of the Intend to Publish Version of the London Plan. Policy H5 of the Intend to Publish Version of the London Plan and Policy DMH7 of the Hillingdon Local Plan: Part Two require a minimum of 35% affordable housing. To follow the fast track route and not be required to submit a financial viability assessment, applicants must meet the following criteria:
- Meet or exceed the relevant threshold level of affordable housing on site (35%) without public subsidy
-Be consistent with the relevant tenure split (70/30 social rent/intermediate).

The applicant is proposing a payment in lieu of affordable housing rather than on-site delivery due to the complex communal living arrangements which will be provided on site and it being impractical to deliver affordable housing on site. A payment in lieu for a scheme such as this could be considered should exceptional circumstances be demonstrated as outlined in paragraph 4.4.10 of the Intend to Publish Version of the London Plan. This should be of a value equivalent to 35% of the 161 proposed specialist older persons housing.

Use Class of the Proposed Accommodation

It is advised that a legal agreement is sought which restricts occupancy of the units to the elderly and people in need of personal care. Without this the proposal would not fall within Use Class C2 and would instead be considered to fall within Use Class C3. If this is the case, the acceptability of the proposed housing mix which is primarily 1 bedroom apartments would need to be reconsidered as it is an unsuitable housing mix for general residential accommodation.

Additional evidence provided by the Applicant is noted and demonstrates that the proposed provision would contribute to meeting the borough's London Plan annual benchmark for specialist older persons housing of 180 units per annum.

Cafe/Restaurant

The applicant is also proposing a 212 sqm cafe / restaurant (Class E) for public use. The compatibility of this use with the specialist housing in terms of amenity impacts on residents should be assessed.

Policy DMTC 4 states that proposals for restaurants will only be supported provided that they:

·Would not result in adverse cumulative impacts due to an unacceptable concentration of such uses in one area;
·Would no cause unacceptable disturbance or loss of amenity to nearby properties by reason of noise, odour, emissions, safety and security, refuse, parking or traffic congestion; and
·Would not detrimentally affect the character or function of an area by virtue of the proposed use or visual impact.

There are residential units to the east of the site and the site is located in a predominantly residential road, and the potential impacts on parking and the street scene as a result of this development should be appropriately assessed by the applicant.

Car Parking

It is noted in the GLA's Stage 1 comments that given the PTAL level of this scheme it should be car free. It is noted that the parking standards in London Plan policy T6.1 apply to residential developments and there is a question of applicability to C2 housing. Given that Policy T6.1 refers to residential development rather than a specific use class the Guild Residences part of the development would be regarded as falling within the remit of the residential standards as a type of residential development. Separate standards would apply to the care home element of the scheme.

On the basis that an element of the scheme should be car free, the current provision of 76 spaces at approximately 0.5 spaces per unit is significantly above the car free requirement of the London Plan. However, it is noted that the development plan has changed during the lifetime of this application with the applicant previously working to the Local Plan maximum standards of 1-1.5 spaces per dwelling. This change in policy context would be a material consideration given that the applicant had sought to significantly reduce parking levels relative to the previous maximum standards. In addition, the applicant has highlighted that as many future residents will be looking to downsize from street properties, the ability to retain a private vehicle is likely to be an important consideration to residents who would ultimately be freeing up larger family homes. Some robust evidence supporting this position would be beneficial.

It is also noted that the proposed parking is managed solution with a concierge and that car owners will not have direct access to the car park. This is primarily due to the use of double car stackers in order to accommodate the applicant's desired level of car parking. The proposed use of stackers does suggest that the current level of car parking provision may have resulted in some operational compromises that also builds in a cost to future residents through the need to maintain the concierge service. Alternative options such as the provision of a resident's car club would appear one such solution to reduce the overall need for parking whilst ensuring good access to the use of a car is maintained. Evidence of regarding such a consideration should be provided.

Sustainability Officer - May 2021

Further to a review of additional information provided by the applicant, the Sustainability Officer noted the comments on energy for the Harefield Road scheme are as previously with a change to the report reference in the condition to as well as a change to the S106 contribution to £99,473.

Overheating Assessment

The updated report shows the development complies with the DSY1 requirements of London Plan Policy SI4 and the supporting energy assessment guidance. However, the development shows some failures against the DSY2 and 3 criteria (i.e. the more extreme heat events).

There has been an extensive study in London on the impacts of overheating on the elderly leading to a Care Home overheating audit pilot project. It is noted:

"The Mayor is concerned about the impacts of hot summers on older people. According to Public Health England (PHE) the three heatwaves in 2019 resulted in over 230 excess deaths across London. In one week in August 2019 (23-29 Aug) there were 108 excess deaths of people of 65 or older."

The supporting studies show that older people are particularly vulnerable to overheating with over 600 excess deaths reported following the 2003 heatwave (Criteria DSY2 for the overheating assessment). Whist it is accepted this is not a care home, the users are those that are vulnerable in heatwaves.

It is also necessary to note that extreme events are more prevalent. Consequently, planning solely for the base case (DSY1) is not prudent nor supported by the guidance. It is therefore necessary to ensure that the development is constructed and operated in a manner that is adaptable to these extreme events. A condition is therefore necessary.

Trees and Landscaping Officer

Further to my previous comments of December 2020 and the receipt of amended drawings submitted on 10 and 11 March 2021, please find my observations.

1. The amended layout has resulted in a reduction of 12 units, from 194 - 182. Car parking spaces have been reduced by 4, from 80 -76.
2. Key landscape improvements have been enabled by setting back the development from the Harefield Road frontage by 2 metres and improving the accessibility and layout of the courtyard area and play area.
3. Cross-sections have been submitted to illustrate the site perimeter landscape treatments, including the access road, east boundary and Harefield Road frontage.
4. Part 3.0 of the Design & Access Statement, incorporates a Landscape Planning Addendum (parts 1-4 of 4) by Andy Sturgeon. This highlights seven specific changes

(improvements) to the landscape strategy in response to previous concerns and the refinement of the site layout.
5. At 2.2 (p.9) it is confirmed that the access road trees will be supported by structural soil cells - providing the required soil volumes to support and sustain healthy tree growth.
6. At 2.3 the report illustrates the design intention for the Harefield Road frontage with 8 trees and lower-storey ornamental planting. This proposal will make a significant contribution to the character and appearance of the public realm.
7. At 3.1 the report provides a palette of proposed trees incorporating 10 different species, providing a range of forms and seasonal highlights.

The recent amendments provide significant improvements to the landscape layout; however, the success of this scheme will be subject to detailed design, the quality of implementation and establishment - and future management and maintenance.

RECOMMENDATION: No objection to conditions RES9 parts 1,2,3,4,5 and 6. Please add a bespoke condition requiring the 'the design and construction details, including the specification of growing medium, for all tree pits and green roofs'.

INDEPENDENT ACOUSTIC CONSULTANT CONCLUSION

An independent acoustic consultant was appointed by the Council to review the technical reports given a noise sensitive development is being introduced on site.

RBA Acoustics has since revised the description and confirmed that it does not expect noise from JR Autos to cause any future issues. We've stated above that we feel it is questionable whether the survey was sufficient to form a firm conclusion, and so in the spirit of protecting both the future occupants and the operation of Penfield Estate, it is recommended that this is reviewed by a planning condition prior to completion.

Further consideration may still be required in terms of the siren noise since the relevant (LAmax) threshold is only met with windows closed and yet the ventilation and cooling strategy has yet to be confirmed. This is the case generally at this stage, however, with the revised APR concluding"...a Level 2 AVO assessment in accordance with TM59 will need to be undertaken at a later design stage. "At which point, the LAmax levels can be considered together with the LAeqlevels, as per the AVO Guide.

If, therefore, LBH is mindful to grant permission, conditions along the lines of the following are recommended:

- Details of the measures to control plant noise emanating from the site to meet the limits (and follow the associated guidance) within the Acoustic Planning Report (Revision 4) to be submitted to, and approved by LBH.

- Details of an AVO Guide Level 2 assessment accounting for both LAeq and LAmax sound levels (including from sirens), and the measures to control external environmental noise ingress to meet relevant internal noise targets within habitable rooms during both ventilation and overheating conditions to be submitted to, and

approved by, LBH. The Level 2 assessment and measures should account for the overheating assessment and energy strategy, with any mechanical system noise generated within the habitable rooms being assessed and adequately attenuated. Full details of the associated noise survey data, modelling assumptions and calculations to be included.

- Details of sound level measurements undertaken at the location of the south-eastern elevation of the scheme, overlooking Penfield Estate, prior to occupation, sufficient to check the likely degree of impact or otherwise from any commercial noise(e.g. from JR Autos) in accordance with the Noise SPD/BS 4142 (and BS 8233, where applicable), to be submitted to, and approved by, LBH. Where the requirements of the Noise SPD are not met and/or an impact is expected based on the guidance on BS 4142, details of the noise control measures to be incorporated into the scheme to be included in the submission.

Independent daylight and sunlight consultant conclusion

An independent daylight and sunlight consultant was appointed to review the technical reports submitted in support of the application. The report concluded:

An independent review of the Report prepared by AY and submitted in support of the planning application to LBH has been undertaken. The review has not extended to undertaking our own modelling and technical analysis. Rather, the review assumes that the modelling and accuracy of the analysis undertaken by AY are accepted.

It is accepted that the daylight and sunlight methodologies utilised by AY are valid, appropriate and in accordance with LBH's requirements.

The report highlights four properties that experience transgressions of the criteria set out within the BRE Guidelines for daylight and sunlight impacts on neighbouring properties. These are Laburnum Court and 14, 18 & 20 Harefield Road. Overall, whilst there are daylight and sunlight impacts that constitute technical breaches of the BRE criteria for daylight and sunlight to neighbouring properties, GIA consider the impacts to be in line with the flexibility intended within the BRE Guidelines, the policy and guidance discussed, as well as the relatively undeveloped nature of the existing site in the context of the overall planning balance. In many cases, the existing architecture of the properties inherently limits the daylight and sunlight availability to the windows and rooms.

The overshadowing assessment undertaken by AY shows that the BRE criteria for sunlight to amenity spaces is satisfied for both existing and proposed spaces.

The assessment of daylight amenity within the proposed scheme has been undertaken by notionally internalising the kitchens of the deep LKD rooms in order to demonstrate that the main living areas achieve good levels of daylight. Whilst GIA feels that an assessment of the rooms including the kitchens would demonstrate lower daylight values to the room as a whole, it is accepted that the assessment carried out by AY is representative of the daylight amenity to the main living areas of the rooms, which will be most-used by the occupants.

In terms of sunlight within the proposed scheme, there is a high level of compliance with the BRE criteria. Where windows do not meet the BRE criteria, the rooms are largely served by more than one window and would experience a good perception of sunlight overall. In a small number of instances, rooms are served by single windows that do not meet the criteria for sunlight. However, these are isolated and either face largely east, or are unavoidable if the scheme it to be built as proposed.

Overall, GIA considers the daylight and sunlight results for the proposed scheme and impacts on neighbouring properties to be within the flexibility intended within the BRE Guidelines and reasonable for the site given the need to make efficient use of land and optimise housing capacity. It is also pertinent that the site is largely undeveloped, resulting in low and unrealistic levels of existing obstruction to daylight and sunlight.

Independent financial viability report conclusion

The appraisal shows that the scheme generates a positive land value of £3,078,000. It included a sensitivity analysis to model the impact of changes to build cost and sales values on the scheme's viability.

The inclusion of the event fee valuation is welcomed. Despite the amended changes significant areas of agreement are acknowledged.

Benchmark Land Value

The applicant has adopted a Benchmark Land Value on the basis of an EUV+ approach for the site which is considered to be appropriate. The applicant's latest position is considered to be full and reasonable; they have adopted a Market Rent at the bottom of the range of the market evidence and a yield towards the top of the range of the evidence to reflect the short lease term. This aspect of the scheme viability is considered to be acceptable.

Proposed Scheme

The scheme proposals include the redevelopment of the site to provide a C2 care led scheme with a range of Guild Living products depending on the level of care required by the resident. The scheme now includes 182 units split, 153 Guild Living Residents, 5 Guild Care Residential and 24 no. Guild Care Suites in order of the care level requirements. We consider the GLR units are slightly under valued on the basis of the extensive community facilities being built and the premium they drive over the C2 McCarthy and Stone comparable schemes which have a more limited care offer and a lower level of residents amenities.

The event fee model is based on a model previously negotiated with Guild as such we consider this element of the scheme viability to be acceptable.

Development Costs

A Cost Consultant, has provided a cost report. The applicant's costs were considered to be slightly high, we have adopted his revised build cost for the purposes of our appraisal.

Review Mechanism

We would expect review mechanisms to be included in this scheme given it falls far from the policy target requirements for 35% on-site affordable housing, split 70% social rent and 30% intermediate tenure. Uxbridge Town Centre is in our view an up-and-coming area and there is scope for the residential values to significantly improve in the near future and our in-house view is that it is highly likely sales values will increase over the project period.

Officer comment: The applicant has revised their affordable housing contribution to reflect the findings of the report.

7. MAIN PLANNING ISSUES

7.1 THE PRINCIPLE OF THE DEVELOPMENT

Loss of Existing Retail Units

The site is located within Uxbridge Metropolitan Town Centre, outside of the primary and secondary shopping areas and the site currently comprises two large footprint single storey retail warehouse buildings with approximately half of the site used for surface car parking.

Part D) of Policy DMTC 2 of the Hillingdon Local Plan: Part Two (2020) states that outside of defined primary and secondary areas, proposals for a change of use from retail uses will be permitted, provided the change does not result in the loss of an essential local service.

The application site comprises two retail stores: Wickes and Halfords with associated parking. Wickes is a DIY and hardware retailer which is designed for trade customers (Use Class E), however it also serves a mixture of retail sales to visiting members of the general public. Halfords is an auto spares and accessories retail store which includes a sizable amount of cycle (and associated accessory) sales. Neither stores are essential shops as defined by paragraph 3.14 (pharmacy, post office, grocer, baker, butcher, greengrocer and newsagent) of the Hillingdon Local Plan: Part Two (2020).

The proposal would result in a loss of 3,355 sq.m existing retail floorspace. The proposal seeks to replace the commercial provision with small-scale commercial, leisure and community uses at ground floor level which are intended to be publicly accessible.

The Applicant has considered whether the loss of retail provision from the application site will affect the availability of the goods that these stores sell. It is noted that there are 6 DIY stores and 7 car and automotive stores within a 5 mile radius of the site indicating that there is sufficient alternative retail provision within the locality of the site.

The primary function of Part D of Policy DMTC 2 is to protect essential shops and the current uses on site are not considered to be essential shops, there are no policies affording the existing shops protection, and on this basis, the loss of the existing shops is considered acceptable and it is considered that their loss would not undermine the vitality and viability of Uxbridge town centre.

Older Persons Housing and Care Home Accommodation

Paragraph 59 of the NPPF (2019) notes it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Policy H13 of the London Plan (2021) emphasises the importance of increasing the provision of specialist housing for older people in view of London's demographic changes and housing needs, to improve the quality of the existing stock across London and to encourage downsizing. The London Plan (2021) has set an indicative benchmark for specialist housing provision for older people which in Hillingdon is between 155 to 180 units per annum.

Policy H13 of the London Plan (2021) does not define or distinguish care home accommodation from other forms of specialist housing for older people on the basis of the Use Class Order or by reference to Class C2 or C3 uses. Instead, the policy defines care home accommodation as having certain specific attributes in terms of the needs of occupants and the way it is managed, with care homes providing accommodation for people who require nursing or personal care and where there is no separation between the personal care and the accommodation provided.

Policy DMH 8 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:
A) The development of residential care homes and other types of supported housing will be permitted provided that:
i) it would not lead to an over concentration of similar uses detrimental to residential character or amenity and complies with Policy DMH 4: Residential Conversions;
ii) it caters for need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;
iii) the accommodation is fully integrated into the residential surroundings; and
iv) in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.

B) Proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).

The Council's Strategic Housing Market Assessment (2016) (SHMA) projects that there will be a demand for: 640 traditional sheltered housing units; 480 'extra care' units; and, 220 'sheltered plus or enhanced sheltered' units over the period 2014-36.

Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) states:

"care" means personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment.

The Planning Practice Guidance states that when determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration should be given to the level of care and scale of communal facilities provided.

The application proposal seeks to provide 'specialist older persons housing' available to those above 65 and in need of at least 2.5 hours of care a week. In terms of the model being offered by the applicant, the 'specialist older persons housing' comprises accommodation that has been specifically designed and managed for older people. This application seeks to provide 3 types of accommodation as part of the development which are summarised below:

Guild Living Residences: Specifically designed for older people aged 65 years and above and which would be secured by tenancy agreements in which a minimum of 2.5 hours of personal care/support per week would be provided. These units would provide specialist accommodation for older people requiring lower levels of care to enable independent living. Care provided would be secured via separate contracts or agreements, and would effectively be separate from the accommodation, which would be subject to leasehold, freehold or tenancy agreements, thereby offering residents a choice as to who provides the care.

Guild Care Residences: Functions as traditional care home accommodation where personal care and accommodation are provided together as a package. The units are available to rent and are restricted to over 65s (unless they have a partner who would also be living in the residences). Typically, there would be at least 3 hours of care per day for those with mobility, nursing or cognitive needs, but could also include companionship and company.

Guild Care Suites: The suites would function very similarly to GCR with an added level of care. End of life needs could be managed here, as can nursing and dementia needs.

The proposal is responding to a growing need identified in London for specially designed and built housing for older people with a range of care and support services to allow them to live as independently as possible. The proposal seeks to target an ageing population who currently live in owner occupied family-sized houses and have limited opportunities locally to downsize into purpose-built accommodation which is specifically designed to cater for the long term care needs of elderly residents. The development would provide such a facility.

The proposed units would be either wheelchair-accessible or wheelchair adaptable which are supported by a range of health and wellbeing, catering and service facilities. The communal facilities in this case include a health/wellbeing centre, resident lounges, parking for cars and wheelchairs/mobility scooters, and communal gardens and spaces. There would be a concierge service.

The flats would be available on a restricted basis. Future occupants would need to be over 65 years old. Guild Care Residence primarily contains self-contained dwellings that have all the facilities for independent living, are sold on long leases and could be occupied without any dependence on communal facilities. Although there could be a high level of care over time to the degree that it could be similar to that provided in a Class C2 nursing home, the baseline of care stated for this model is 2.5 hours per week and for some, this may not change much over time. Should the occupants of the Guild Care Residences require more care in the future, this can be provided on site.

Guild Care Suites and Guild Care Residences would operate as a care home whereby personal care and accommodation are provided as a package.

The development would contribute to meeting supported living provision in the Borough, which carries significant weight in favour of the development.

There is no in principle objection to the redevelopment of the site to provide specialist older person housing subject to compliance with all other material considerations. Should the application be considered acceptable, a clause within a Section 106 legal agreement is required which restricts occupancy of the units to over 65yrs with a minimum of care package of 2.5 hours a week. Without this the proposed Guild Care Residences would not fall within Use Class C2 and would instead be considered to fall within Use Class C3.

Cafe/Restaurant/Bar/Wellness Centre and Commercial Unit

Policy SD6 of the London Plan (2021) strongly supports mixed-use developments that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

Policy DMTC 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals for restaurants will only be supported provided it would not result in adverse cumulative impacts due to an unacceptable concentration of such uses in one area.

The application proposes a cafe / restaurant/bar and wellness centre (Class E) for public use. The proposed restaurant/cafe/bar would primarily serve the residents of the development. A separate commercial unit would also be provided. The facilities are also available to members of the public, subject to availability. The proposal would create an active frontage overlooking the public open space. The provision of the wellness centre and flexible restaurant/cafe/bar and commercial unit meets the objectives of Policy SD6 of the London Plan (2021) which promotes mixed use developments. It is not considered the

proposal would result in the over concentration of such uses in this area, rather it complements the specialist older person accommodation proposed.

UNIT MIX

Policy H10 of the emerging London Plan (2021) outlines that the nature and location of the site needs to be taken into account, with a higher proportion of one and two bed units generally being more appropriate in locations with higher public transport access and connectivity.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.

The proposal includes the following mix:

- Guild Living Residence: 9 x studios and 26 x 1 bed, 114 x 2 bed and 4 x 3 bed.
- Guild Living Care Residences: 5 x 1 bed.
- Guild Care Suites 24 x 1 bed.

The proposed unit mix promotes housing choice by providing a range of housing, enable downsizing to free-up larger family sized homes and contribute to an identified need for older persons' housing. Given the development is specifically providing for specialist older persons accommodation, the proposed unit mix is considered acceptable.

7.2 DENSITY OF THE PROPOSED DEVELOPMENT

Policies H1 and SD6 of the London Plan (2021) encourage the comprehensive mixed use redevelopment of to enable the provision of high density residential and mixed use development in accessible locations, whilst also supporting the overall vitality of town centres. Policies D1 to D4 of the London Plan (2021) place greater emphasis on a design-led approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure.

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states Hillingdon will apply the density standards in a flexible manner, according to local circumstances. It recognises that areas such as Uxbridge town centre are more suited to higher density development, which in some cases may exceed London Plan Standards.

Numerical density standards have recently been removed from the adopted London Plan 2021 to avoid the quantitative standards being applied mechanistically. To this end, the application site comprises a town centre brownfield site where a suitable design led approach should deliver the best use of the site subject to accordance with all other planning policies. The current proposals are considered to be providing a suitable design led approach to delivering the best use of this site.

7.3 IMPACT ON ARCHAEOLOGY/CONSERVATION AREAS/LISTED BUILDINGS

The development site is undesignated however it is situated in a sensitive location surrounded by heritage assets. To the south is the Old Uxbridge/Windsor Street Conservation Area which is focused on the High Street. The north side is closest to the site has a run of grade II listed buildings, numbers 118-123. Opposite on the south side are the grade II listed The Cedars and the Old Bank House. An alley leads off to the north to Beasleys Yard where there is the Grade II listed Watts Hall. There is a further run of listed buildings commencing on the other side of the alley, numbers 126-135 High Street and these are terminated by the grade II The Crown and Sceptre Public House (now Whelans). Opposite the site on the Harefield Road is the locally listed Uxbridge Magistrates Court and to the north east the North Uxbridge Area of Special Local Character.

ARCHAEOLOGY

Section 16 of the NPPF (2019) and Policy Policy HC1 of the London Plan (2021) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. Paragraph 189 of the NPPF (2019) states applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

The Greater London Archaeological Advisory Service (GLAAS) were consulted on the application who raised noted the application site lies in an area of archaeological interest. The applicant's archaeological desk-based assessment shows that remains of a Bronze Age settlement and land boundary ditches were found during an investigation conducted in 1993-4. These are part of an extensive Bronze Age landscape covering much of the Lower Colne Valley. There appears to be a trackway aligned on the natural crossing point over the Colne at the site of the medieval bridge. The eastern and central parts of the site were investigated and ground levels subsequently reduced so there is very limited potential in these areas. However, the western part of the site was not investigated and may have greater surviving potential. Any surviving remains could be harmed by the proposed new build.

Following a review of the Greater London Historic Environment Record, GLAAS advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. A two-part condition is therefore recommended. This would require an evaluation to clarify the nature and extent of surviving remains, followed, if

necessary, by a full investigation. Should the application be considered acceptable, it is recommended that required condition is secured to ensure archaeological interest within the site is not disturbed or appropriately mitigated.

LISTED/LOCALLY LISTED BUILDINGS

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 'Act') require the Local Planning Authority (LPA) to pay special regard to the desirability of preserving listed buildings, their setting and any architectural features that they possess.

The NPPF (2019) requires its own exercise to be undertaken as set out in its chapter 16. Conserving and enhancing the historic environment. Paragraphs 184-202 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 196 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy HC1 of the London Plan (2021) requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, including registered historic parks, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy HE1 of the Local Plan: Part One (2012) states the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens and historic landscapes, both natural and designed.

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:
A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:
i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
iii) it makes a positive contribution to the local character and distinctiveness of the area;
iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

The impact of the proposal on the statutory Listed Buildings on the High Street have been considered and given their relative distance from the site, the proposal is not considered to impact on or harm the setting of the listed buildings or their significance.

The amended plans and visuals show a further setback by 2m along Harefield Road, the reduction to 7 storeys with further setbacks to the massing. The overall height of the building has also reduced.

The amended proposal has reduced the development's dominance on the street frontage as well as mitigated against its imposing presence. The proposals now allow for more landscaping to the front of the building.

The setback allows for more substantial street trees, adequate pavement widths as well as additional landscaping to help improve and soften the developments setting. The amended proposal is considered to relate better to the site's context.

The amended proposal is considered to respond appropriately to the locally listed Uxbridge Magistrates' Court. The development is not considered to result in any harm to the surrounding listed and locally listed buildings or their setting.

CONSERVATION AREA/ AREA OF SPECIAL LOCAL CHARACTER

In considering development affecting a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that local authorities shall pay special attention to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area. The duties imposed by section 72 of the Act are in addition to the duty imposed by section 3(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.

Paragraphs 184-202 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 196 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy DMH4 requires new development, on the fringes of a Conservation Area, to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness.

As noted above, the Old Uxbridge/Windsor Street Conservation Area lies to the south of the site. To the south-west of the site lies the Rockingham Bridge Conservation Area, which contains several locally listed buildings and a number of buildings of merit.

Further to the west lies the Uxbridge Lock Conservation Area, whose character and appearance derives from its semi-rural nature and the variety of historic buildings and structures associated with both the Grand Union Canal, built through the area in the 1790s, and the Oxford Road, a modern trunk road built along the line of the historic London to Oxford highway.

To the north and north-east of the site lies the North Uxbridge Area of Special Local Character, which is a locally designated heritage asset.

The revised proposed which reduced the height and massing of Block B has reduced the impact on the Conservation Area and the Area of Special Local Character. The revised proposal would not result in harm to any designated or non-designated heritage assets.

7.4 AIRPORT SAFEGUARDING

Policy DMAV 1 of the Local Plan: Part Two (2020) notes that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the relevant airport operators on proposals in safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

A response to this application was received from NATS, Heathrow Aerodrome Safeguarding and the Ministry of Defence who raised no objection to the application subject to the inclusion of conditions requiring red static omni-directional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane during construction and a Bird Hazard Management Plan.

7.5 IMPACT ON THE GREEN BELT

The application site does not fall within land that is designated as Green Belt. As such, the proposal would not impact the Green Belt.

7.6 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

Paragraph 95 of the NPPF (2019) requires planning decisions to promote public safety and consider wider security and defence requirements by appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.

Paragraph 108 of the NPPF (2019) in assessing specific applications for development, it should be ensured that safe and suitable access to the site can be achieved for all users. Paragraph 110 of the NPPF (2019) requires developments to give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas and create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards

Paragraph 127 of the NPPF (2019) requires planning decisions to ensure developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

Paragraph 130 of the NPPF (2019) states permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

Paragraph 131 of the NPPF (2019) provides that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policies D1-D3 of the London Plan (2021) requires all development to make the best use of land by following a design led approach that optimises the capacity of sites. The policies set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages and improving permeability and overlooking.

Policy D8 of the London Plan (2021) requires development proposals to ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Paragraph D in particular, expects development proposals demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.

Policy D8, paragraph E of the London Plan (2021) seeks to ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible.

Policy D8 (N) of the London Plan (2021) requires developments to ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines.

Policy D9 of the London Plan (2021) requires that development proposals, where tall buildings are being provided, should buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm and that entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.

Policy BE1 of the Local Plan: Part One (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 10 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) re-emphasises the importance of good design in new development by A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure; B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space; C) safeguarding the development potential of adjoining sites and D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 of the Local Plan: Part Two (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The National Design Guide Planning practice guidance for beautiful, enduring and successful places (2019) guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance which has been produced in response to the National Planning Policy Framework which makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve.

Under the Context (Enhances the Surroundings) Chapter, paragraph 40 (p 11) of National Design Guide Planning practice guidance for beautiful, (2019) notes that well designed new development can respond positively to the features of the site itself and the surrounding context beyond the site boundary. Features include: the existing building development, including layout, form, scale, appearance, details and materials; landform topography, geography and ground conditions; access movement and accessibility; views inwards and outwards.

The existing site is comprised of low-lying retail units that are circa three-storeys (equivalent in height, with a large open front court area for car parking, access, servicing and landscape. The existing buildings cover approximately two-thirds of the site area and are significantly set back from the western boundary. There is mature landscape along the northern and

western boundaries that help to integrate the site with the surrounding suburban context and soften the impact (screening) for the residential houses that abut the site. The site itself is located on the north-western edge of the town centre boundary.

Height/Scale/Massing

The proposed development comprises two 'L-shaped' blocks with a podium and public space to the centre. The western / southern block (Block A) fronting onto Harefield Road is three to 7-storeys in height with three to 5-storeys at the lower levels along Harefield Road. The north / eastern block (Block B) is 4-7 storeys. The site resides within a predominantly edge of centre setting comprising 2-storey houses and some 3-4-storey retail, office and civic buildings, further south and eastwards.

The proposal would intensify the developed nature of the site. Built form would cover most of the site with heights ranging from 3- 7 storeys. The development would be a prominent building within this part of the townscape being seen within kinetic views as one moves through the area and will also will be seen within gaps between buildings and from the rear gardens, service yards and access roads in close proximity to the site.

Following a review of statutory and comments from neighbouring residents, the proposal was amended to reduce the height of the development across the site by lowering all floors by one brick course and removing a storey from the eastern part of the site. The massing has been stepped back from Harefield Road and the building line along Harefield Road has been setback by a further 2m.

The Design Officer has raised concerns with the height and bulk of the southern part of Block A which rises to a height of 7 storeys. The Design Officer considers that the height fails to provide an appropriate and respectful transition between the edge of town centre context to the suburban context to the north of the site. However, it is considered that this height difference is apparent in limited views. When the development is considered in the context of the wider site and views, the 7-storey element which is significantly setback within the site has limited impact on the wider streetscene setting. It is considered that on balance, the amended proposal would provide an acceptable transition between the town centre and the suburban context to the north.

Policies DMHB10 of the Local Plan Part 2 (2020) and Policy D9 of the London Plan (2021) relate to Tall Buildings and this development would be considered a tall building in so far as it exceeds 6 stories in height (Policy D9 of the London Plan 2021) and is taller than its surroundings (Policy DMHB10 of the Local Plan Part 2 (2020)). The site is located on the edge of Uxbridge town centre which is considered to be suitable in principle for tall buildings. The proposed height and scale of the proposal, given the setbacks, is considered to make an acceptable transition between the suburban context and the town centre.

Layout

The proposed development comprises two 'L-shaped' blocks with a podium and public courtyard space to the centre. The proposal provides a frontage along Harefield Road with

active residential frontages with individual front door entrances set behind a landscaped front boundary. The main entrance into the site is via an internal road which leads to the porte cochere. The internal road runs from the western side of the site off Harefield Road, it would adjoin the southern part of the site leading to Warwick Place. The internal access road (including footway, road and landscaping) has a width ranging from 8.6m to 22m (as it turns the corner).

All vehicular, pedestrian, cyclist, mobility scooter access is taken from the internal access road. The internal access road would facilitate on-street car parking spaces including a dedicated minibus parking bay. All drop off, pickups, delivery, waste collection, attendance by the emergency services and servicing is taken from the one-way internal access road which also includes landscaping and street trees.

The potential for the Police Station to come forward for redevelopment has been considered, and Officers are satisfied that the proposals would not blight any future proposals on the Police Station site.

The proposed on-street car parking is provided along the length of the internal road, one footway is provided which is at least 1.8m in width. The ground floor layout has been amended to increase the width of the footway and alter the car parking arrangements. The shared surface treatment together with the generous dedicated pedestrian access route would provide a welcoming entrance to the site.

The provision of a central public courtyard is supported and the proposed hard and soft landscaping and planting strategy for this space is well-considered. The proposal to incorporate commercial and communal activity overlooking the central courtyard is supported and would allow informal mixing between residents and visitors within the public open space and landscaped courtyard, drawing the public and wider community into the site.

Detailed Design and Materials

The architectural and material quality of the proposed scheme is considered acceptable given the site's context. The detailed design includes different shades and textures of red brick proposed, alongside corrugated dark brown aluminium cladding and window frames.

For the reasons outlined, the proposed scale is considered appropriate within the edge of town centre location and the suburban context to the north of the site. The proposal incorporates principles of good design, the layout of the site and the internal access road has been amended to prioritise pedestrians and vulnerable users with the reduction in car parking and incorporation of a more generous pedestrian route to the entrance of the site. The proposal would accord with Policy BE1 of the Local Plan: Part One (November 2012), Policies DMHB 10, DMHB 11 and DMHB 12 of the Local Plan: Part Two Development Management Polices (2020), Policies D1-D3, D8, D9, T6.5 and T7 of the London Plan (2021) and Paragraphs 95, 108, 110, 127 and 130, 131 of the NPPF (2019).

7.7 IMPACT ON NEIGHBOURS

Policy BE1 of the Local Plan: Part One (2012) requires developments to be appropriately designed so that they do not adversely affect their surroundings or the local character.

Policy DMHB 11 of the Local Plan: Part Two (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The nearest residential units affected by the development are the residential units to the north, namely; 14 to 20 (even) Harefield Road, 13-51 Lancaster Road and to the east namely; Nos 2-32 Wilmar Close and Laburnum Court, 9 Harefield Road to the west.

PRIVACY

Building A is situated 22.2m from Laburnum Court, 9 Harefield Road to its west, separated by Harefield Road and 28m from the nearest habitable room windows at Nos 14-16 Harefield Road. Whilst it would be situated 19.2m from No. 18 Harefield Road, it is positioned at an oblique angle. It is therefore concluded that there would be no direct overlooking between habitable room windows of Building A and neighbouring properties.

Building B would be located 43m from the nearest habitable room windows on Lancaster Road and 51m from the nearest habitable room windows on Wilmar Close.

It is noted that in response to the consultation, concerns have been raised in relation to the perception of overlooking between the 2 proposed balconies on the northern elevation and the rear of the properties on Lancaster Road. Should the application be considered acceptable, a condition would be secured requiring details of the proposed balconies to provide a privacy screen to mitigate against overlooking into No. 18 Harefield Road and treatment to mitigate against the perception of overlooking towards the properties and gardens along Lancaster Road.

Neighbouring dwellings and future occupants would not suffer from unacceptable loss of privacy as a result of the development.

DAYLIGHT/SUNLIGHT

The submitted daylight and sunlight report has been reviewed by an independent Daylight and Sunlight consultant appointed by the Council.

With regards to Daylight and Sunlight impacts on neighbouring properties, the independent consultant noted the existing site comprises of a low-rise, warehouse-style retail building, which is divided into two units. The units occupy approximately half of the site area, with the other half consisting largely of a car park. Given the low rise and undeveloped nature of the site, neighbouring properties presently enjoy high levels of daylight and sunlight amenity. It is therefore inevitable that there will be breaches of the criteria set out within the BRE Guidelines where any meaningful massing is proposed. The independent consultant has considered whether the breaches of the BRE criteria is within the flexibility

the guidelines and whether the proposal is acceptable in the context of the wider planning considerations.

The independent consultant found that the two windows that do not meet the BRE criteria for sunlight, located within 21 Lancaster Road and 12 Wilmar Close. However the shortfall represent transgressions that should be acceptable overall as there are absolute changes that would not be noticeable, retained annual sunlight that exceeds the criteria, and/or there are additional windows serving the rooms that exceed the criteria.

4 properties that do not demonstrate full compliance with the daylight and sunlight criteria set out within the BRE Guidelines these are at Laburnum Court, 14 Harefield Road, 18 Harefield Road and 20 Harefield Road.

With regards to Laburnum Court, the independent consultant notes 40 (85%) of the 47 windows assessed will satisfy the BRE Guidelines for Vertical Sky Component (VSC). The remaining seven windows serve two living rooms, two kitchens and three bedrooms, all of which are single-aspect and served by a single window. The independent consultant considers that whilst there are alterations in daylight to this property as a result of the proposed scheme, these are to be expected given the existing architecture of the property and the undeveloped nature of the existing site. Overall, the independent consultant considered that the daylight and sunlight impacts to this property should be acceptable.

With regards to 14 Harefield Road, 2 windows, located at ground and first floor level and serving a kitchen/dining room and unlabelled room (assumed bedroom), respectively, directly face the undeveloped car park part of the site and are situated very close to the site boundary (noted to be "less than 1.5m"). These windows and rooms are expected to experience breaches of the BRE Guidance if any meaningful development were to be implemented on the site. For daylight, 1 of the 6 windows assessed will satisfy the BRE Guidelines for VSC. 4 of the remaining 5 windows serve a single kitchen/dining room. 1 window is directly facing the vacant part of the site in the existing scenario. It experiences a 70.6% reduction in VSC and retains 6.4% VSC in the proposed scenario. However, the window is a secondary window to a dual-aspect kitchen/dining room, with windows providing mitigating light and achieving at least 25.6% VSC. The remaining window, serves a bedroom and directly faces the vacant part of the site, experiences a similar reduction of 70.6% VSC and retains 10.8% VSC upon construction of the proposed scheme. For sunlight, 5 (83%) of the 6 windows assessed will satisfy the BRE Guidelines for Annual APSH. None of the six windows assessed will satisfy the BRE Guidelines for Winter APSH. The window that does not meet the annual sunlight criteria retains 18% APSH against the BRE target of 25% and serves the aforementioned living/dining room, which is served by mitigating windows that exceed the BRE criteria (between 29% and 34% APSH). Of the windows that do not meet the BRE criteria for winter sunlight, two are understood to serve bedrooms and are considered least important when compared to other uses. Both retain very high annual sunlight levels, in excess of the BRE target. The remaining four windows serve the aforementioned kitchen/dining room, resulting in a good overall perception of winter sunlight. The independent consultant considers that whilst there are alterations in daylight and sunlight to this property as a result of the proposed

scheme, these are to be expected if any meaningful massing is to be developed on the site owing to its undeveloped nature. Overall, the independent consultant advises the daylight and sunlight impacts to this property is acceptable.

With regards to 18 Harefield Road, for daylight, 14 of the 16 windows assessed will satisfy the BRE Guidelines for VSC. The remaining 2 windows serve a kitchen/dining room and a room within an outbuilding and experience reductions of 32% and 34.8%, respectively. The independent consultant advises the daylight and sunlight impacts to this property is acceptable.

With regards to 20 Harefield Road, all of the 10 windows assessed will satisfy the BRE Guidelines and the independent consultant advises the daylight and sunlight impacts to this property is acceptable.

OVERSHADOWING

The BRE Guidelines recommend that at least half of an amenity space should receive at least two hours of direct sunlight on the Spring Equinox (21st March). For existing spaces where the existing sunlit area is less than half of the space, the area that receives two hours of sunlight should not be reduced by more than 20% (it should retain 0.8 times its former value). The gardens that could be impacted by the development are: 14 to 20 (even) Harefield Road, 13 to 51 (odd) Lancaster Road and 2 to 12 Wilmar Close. The proposal all of the gardens assessed will meet the criteria set out within the BRE Guidelines.

To conclude, the impact to the level of daylight and sunlight has been fully considered following the submission of a daylight and sunlight report, which highlights minimal transgressions, which are considered acceptable. The 4 properties that experience transgressions of the criteria set out within the BRE Guidelines for daylight and sunlight impacts on neighbouring properties. These are Laburnum Court and 14, 18 & 20 Harefield Road. Whilst there are daylight and sunlight impacts that constitute technical breaches of the BRE criteria for daylight and sunlight to neighbouring properties, the impacts are in line with the flexibility intended within the BRE Guidelines, planning policy and guidance taking into account the relatively undeveloped nature of the existing site in the context of the overall planning balance.

The independent consultant has advised that in many cases, the existing architecture of the properties inherently limits the daylight and sunlight availability to the windows and rooms. The overshadowing assessment undertaken shows that the BRE criteria for sunlight to amenity spaces is satisfied for both existing and proposed spaces.

The protection of neighbouring privacy from overlooking has sufficiently been mitigated through design and relevant planning conditions. Neighbouring amenity is not considered to be unduly harmed by the development.

7.8 LIVING CONDITIONS FOR FUTURE OCCUPIERS

RESIDENTIAL QUALITY

Policy D6 of the London Plan (2021) provides minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all residential accommodation that is self-contained.

Of the Guild Living Residences, 97 (63 %) of the proposed units are single aspect and 56 (37%) of the proposed units are dual aspect. The site is constrained and the arrangement of units provides the most efficient layout. This on balance considered acceptable. The proposal includes good floor ceiling heights at 2.6m.

The 153 Guild Living Residences and Guild Care Residences which are studio, 1-bedroom, 2-bedroom and 3-bedroom sized self-contained residential units and would all exceed minimum internal space standards and all habitable rooms have outlook.

The majority of the units would not have access to private amenity space with high unit to core ratios. The overall design approach is considered is on balance acceptable in this particular instance, given the site is constrained which precludes the inclusion of balconies facing directly onto and overlooking rear gardens to the north, as well as townscape constraints along Harefield Road. Additional staircases have been provided for fire safety reasons. Overall, the proposal provides an acceptable living conditions for future occupants.

GUILD CARE SUITES

Care home accommodation is not subject to these standards as it is not self-contained housing, this would be regulated by the CQC and based on the proposed Guild Care Suite units based on their layout are considered acceptable.

OVERLOOKING

For the vast majority of the site, the proposal has been designed to ensure there are no habitable room windows within 21m of each other, in accordance with policy DMHB11. Where there is a distance of 20m between habitable room windows along the southern part of the site (above the porte cochere), the proposal includes obscure glazed windows to mitigate against direct overlooking between habitable room windows.

The proposal includes at least 1.5m defensible space at ground floor level between habitable rooms for each unit and the public realm and at least 1.5m between habitable room windows and communal amenity terraces. Overall, the internal layout and orientation of each unit provides an acceptable quality living space for future residents.

DAYLIGHT/SUNLIGHT

In terms of the internal levels of light to the future residential units, a review of the daylight and sunlight report identifies all proposed units would satisfy or exceed the suggested minimum target ADF. The proposed development will perform well in daylight terms. The proposed kitchens would be reliant upon artificial lighting given their location at the

rear of the rooms, however given the kitchens are not main habitable spaces, this is considered acceptable.

For sunlight within the proposed development, the Report notes that 288 of the 321 windows tested will meet the recommended BRE criteria for annual sunlight and (90) for winter sunlight. The independent report discusses that, where windows are shown to experience transgressions of the BRE criteria, when the sunlight is considered on a room basis, the rooms will achieve good levels of sunlight on the basis that they are largely served by additional windows that exceed the BRE criteria. The windows that would experience minor shortfalls are generally located within elevations oriented just off due east where access to sunlight will be more limited, particularly during the winter months when the sun's trajectory is low or by close to surrounding obstruction posed by the proposed massing. A significant number also relate to bedrooms, which are considered least important in sunlight terms, and all will nonetheless satisfy or exceed the daylight criteria for the assigned use. Overall, the independent consultant considers daylight and sunlight amenity for the proposed units is acceptable.

AMENITY SPACE

Policy DMHB 18 of the Local Plan: Part Two (2020) requires new developments to provide good quality and usable private outdoor amenity space in accordance with the standards set out in Table 5.3. Based on the schedule of accommodation proposed, the applicant is required to provide 3,670 sq.m of private or communal amenity space for the Guild Living Residences. Where communal amenity space is to be provided on site, it would need to be large enough for the use of all residents and have adequate defensible space where required.

This application proposes to provide 476 sq.m of private amenity space through 32 balconies measuring 5 sq.m and 16 gardens. 2,677 sq.m of communal amenity space is being provided through the magistrates garden situated to the north and the podium garden. Overall, the private and communal amenity space being provided equates to 3,153 sq.m. Whilst there is a shortfall in amenity space, this does not take into account the internal amenity areas. Given the intended use of the development as specialist older persons accommodation the provision of private and communal amenity space and ancillary internal amenity areas is considered acceptable.

It is noted that podium level amenity space is proposed. The depth of any podium, and the required supporting structure, will need to be adequate to support a high-quality landscaped environment. If the development is considered acceptable, a condition securing details of the proposed podium level amenity space, including its levels, boundary treatment and a microclimate report is required to demonstrate the podium would provide a good quality level of amenity space to future occupiers.

PUBLIC OPEN SPACE

Policy DMCI 4 of the Local Plan: Part Two (2020) requires major developments to make provision for new open space which meets the needs of the occupiers of the development.

The development would also provide 852 sq.m of public open space at surface level. The open space is proposed to be laid out with hard and soft landscaping and benefits from active surveillance. Overall, the proposed public open space has been well designed and attractively laid out to serve future occupants and visitors to the site.

OVERSHADOWING

Both the ground level 'public plaza' and the main communal garden areas for residents have been assessed or overshadowing. The result of the analysis indicates that both of the proposed amenity areas will satisfy the BRE criteria for receiving at least 2 hours of direct sunlight on 21st March.

COMMERCIAL USES

The proposals include a number of commercial operations at ground floor level including a cafe/restaurant and a commercial unit. These uses are supported in principle as they will bring activity into the centre of the site and into the proposed public open space. However, there is potential for conflict between the residential uses located above due to the number of comings and goings and noise generation and also potential odour from the restaurant. These amenity issues are not considered to be insurmountable as conditions restricting the hours of operation and details of flue/extraction could be secured to mitigate any potential harm.

Overall, the proposal would provide acceptable living conditions for future residents of the development subject to the imposition of suitable conditions.

7.9 TRAFFIC IMPACT, CAR/CYCLE PARKING, PEDESTRIAN SAFETY

Policy T1 of the London Plan 2021, developments within London should support the Mayor's modal shift targets set out in the London Transport Strategy, with the Mayor setting an overall target of 80% of journeys to be made by walking, cycling and public transport. To support this, outer London is expected to have a sustainable mode share of 75%.

Policy H13 of the London Plan (2021) requires specialist older person housing to ensure pick up and drop off facilities are close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances.

Policy DMT 1 of the Local Plan: Part Two (2020) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 6 of the Local Plan: Part Two (2020) states that development proposals must comply with the relevant parking standards. For a development of this type it is required that the quantum of car parking provided is determined.

The current application has been amended in that it no longer provides 76 managed stacker parking for residents has been removed and the ground floor nursery has been replaced by flexible space (Use Class E2). The current application proposal would provide 18no. disabled car parking spaces for residents and a further 15 spaces for staff/carers and general operational requirements. There would be 6 car parking spaces for visitors. A minibus parking space and parking for a car club car would also be provided. Thirty-two secure long stay cycle parking spaces would be provided as well as 44 short stay spaces in the form of Sheffield Stands. This level of provision is in excess of the London Plan 2021 standard and this is supported.

A new servicing bay has been introduced which can accommodate two box vans (or occasional larger vehicles), whilst both the Porte Cochere and the dedicated refuse bay include in the revised scheme being retained to ensure that vehicles do not block the access road whilst loading/unloading.

Taking into account that the site is currently occupied by a Wicks and Halfords store, the number of car trips the amended proposal would generate is comparatively small and a net reduction and could be absorbed within the existing highway network.

The application site is situated on the edge of Uxbridge town centre on the eastern side of the B467 Harefield Road, Harefield forms part of the Boroughs Classified Road Network and is a bus route. In the vicinity of the site, Harefield Road benefits from footways on either side of the carriageway, street lighting and a 30mph speed limited. To the immediate south of the application site is the Hillingdon Metropolitan Police Headquarters, the Police HQ takes access from Warwick Place as do a number of small commercial premises and the rear service yard of a McDonalds restaurant fronting onto the High Street in Uxbridge town centre.

The proposal site benefits from convenient access by walking and cycling to shops, services, facilities. The site also benefits good access to public transport opportunities as indicated by the high PTAL ranking, however PTAL assessments only consider trips within the Greater London area. The lower car parking ratio is considered realistic given that the site benefits from good access to public transport as indicated by a PTAL ranking of 5, Uxbridge underground and bus station are within a reasonable walking distance. However, the trip between the application site and Uxbridge underground and bus station requires that pedestrians cross Belmont Road using the pelican crossing by Barclays Bank and WH Smiths. This pelican crossing is situated on a bend and the carriageway is up to 12 meters wide, as a result it takes pedestrians typically longer than normal to cross the road.

The Mayor's Transport Strategy has a goal that, by 2041, all deaths and serious injuries will be eliminated from London's transport network and new development such as 170 Harefield Road are expected to contribute towards the attainment of the Vision Zero goal. To improve

the safety and convenience with which those residents without access to car parking can walk to Uxbridge underground and bus stations a developer contribution is required to fund the provision of Pedestrian Countdown facilities at the Belmont Road crossing. This road safety measure is supported by Transport for London. Pedestrian Countdown show pedestrians how long they have available to cross the road, such a facility will be of particular benefit to the residents of Harefield Road as the development that would provide '*later living*' accommodation. The cost of providing Pedestrian Countdown and the associated civils works would be £45,000. The Highway Authority require that the developers enter a s.106 Legal Agreement with the Council to fund this Pedestrian Countdown facility. Subject to the inclusion of recommended conditions and legal obligations, the Highways Officer has raised no objections to the proposal.

7.10 URBAN DESIGN, ACCESS AND SECURITY

Design has been addressed in paragraph 7.07 of this report.

Security

Policy D11 of the London Plan (2021) requires development proposals to contribute to the minimisation of potential physical risks and include measures to deter crime and anti-social behaviour. A secured by design condition has been recommended and therefore the proposal is considered to accord with Policy D11 of the London Plan (2021). Whilst some concerns have been raised with regards to overlooking from the development into the neighbouring police station, there are no planning policies protecting police stations from overlooking.

It is noted that the applicant has been in discussions with the designing out crime officer at the Metropolitan Police to ensure the development does not give rise to crime and anti-social behaviour. Subject to the inclusion of the condition, the proposal is considered acceptable in terms of security.

7.11 ACCESS FOR PEOPLE WITH A DISABILITY

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from direct discrimination on the basis of a protected characteristic, which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease.

7.12 PROVISION OF AFFORDABLE & SPECIAL NEEDS HOUSING

Policy H13 of the London Plan (2021) states that specialist older persons housing should deliver affordable housing in accordance with borough and London Plan policies (Policies H4 and H5), which in the case of Hillingdon would equate to a minimum of 35% of homes to follow the fast-track route.

Policy H5 of the London Plan and Policy DMH7 of the Hillingdon Local Plan: Part Two require a minimum of 35% affordable housing. To follow the fast track route and not be required to submit a financial viability assessment, applicants must meet the following criteria:
- Meet or exceed the relevant threshold level of affordable housing on site (35%) without public subsidy
- Be consistent with the relevant tenure split (70/30 social rent/intermediate).

Policy H2 of the Local Plan: Part One (2012) requires sites with a capacity of 10 or more units, to provide an affordable housing mix to reflect the housing needs in the borough, particularly the need for larger family units.

Policy DMH 7 of the Local Plan: Part Two (2020) requires major residential developments to maximise the delivery of affordable housing on site. A minimum of 35% of all new homes should be delivered as affordable housing with a tenure split of 70% Social/Affordable Rent and 30% Intermediate. This should be of a value equivalent to 35% of the 161 proposed specialist older persons housing.

The applicant's submitted viability assessment was reviewed by an independent viability consultant appointed by the Council. The independent viability consultant welcomed the inclusion of the event fee valuation by the Applicant. The independent viability consultant advised that the scheme generates a positive land value of £3,078,000. Following the publication of the report in April 2021, the Applicant has considered the Council's position and agreed to the affordable housing contribution of £3,078,000. On this basis, it is considered that the proposal would deliver the maximum reasonable amount of affordable housing and it accords with policies concerning the delivery of affordable housing.

7.13 TREES, LANDSCAPING AND ECOLOGY

LANDSCAPING

Policy G5 of the London Plan (2021) requires major developments to incorporate high-quality landscaping.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Local Plan:Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

This site is occupied by two retail units (Wickes and Halfords) at the southern end of Harefield Road, situated to the north of the police station. The existing buildings are set well

back from Harefield Road, on elevated land beyond a landscaped car park which serves as a visual filter from the street and residential properties to the north.

There are no TPO or Conservation Area designations directly affecting the site, albeit the existing trees and planting contribute to the character and appearance of the area providing green infrastructure at the interface between the town centre and the residential areas to the north.

The existing site comprises 45 individual trees, 2 tree groups and 1 hedge. 37 trees and the hedge are of a poor quality.

The arboricultural impact assessment (AIA) confirms that most of the 27 trees to be removed to enable the development are 'C' and 'U' grade trees, with just 2 x 'B' category; T26 and T39. A tree protection plan (TPM) and an arboricultural method statement (AMS) are provided. The Trees Officer has raised no objection to the tree strategy subject to the replacement of good quality trees in sustainable tree pits as part of a comprehensive landscape plan.

A Landscape Design and Access Statement has been submitted in support of the application. The main landscape features incorporate a Public Garden Square, a Residents' Roof Garden, Magistrate Court Gardens at ground level, a Wildflower Roof and a Sedum Roof.

Additional tree planting will line the shared pedestrian route through the site and incorporate street tree planting on Harefield Road. An illustrative palette of hard and soft landscape materials is provided, together with illustrations of the various multi-functional character areas. A Preliminary Ecological Appraisal makes recommendations to enhance wildlife and biodiversity that would be incorporated within the landscape details.

The amended plans submitted in March 2021 include key landscape improvements which include the setting back the development from the Harefield Road frontage by a further 2 metres, improving the accessibility and layout of the courtyard area
Cross sections have been submitted to illustrate the site perimeter landscape treatments, including the access road, east boundary and Harefield Road frontage. The amended plans confirm that the access road trees will be supported by structural soil cells providing the required soil volumes to support and sustain healthy tree growth.

The design intention for the Harefield Road frontage incorporates 8 trees and lower-storey ornamental planting. This proposal will make a significant contribution to the character and appearance of the public realm.

The amended proposal provides significant improvements to the landscape layout, however, the success of this scheme will be subject to detailed design, the quality of implementation and establishment, future management and maintenance.

The Trees and Landscaping Officer has raised no objection to the tree strategy or landscaping proposals subject to details which can be secured through conditions.

URBAN GREENING FACTOR

London Plan Policy 5.10 and Policy G5 of the Publication Version of the London Plan (2020) state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

The application proposal has been designed to contribute to green infrastructure and biodiversity. A range of urban greening measures are proposed within the applicant's landscape strategy including lawns, herbaceous and hedge planting areas, trees, a wildflower green roof and a sedum brown roof, with permeable paving areas and landscaping interspersed between car the on-street car parking spaces. The proposal maximises the potential for urban greening, taking into account the site size and the development density constraints. The GLA guidance recommends a target score of 0.4 for residential schemes. The application proposal achieves a score of 0.4 which accords with Policy G5 of the London Plan (2021).

ECOLOGY

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by among other measures, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy DMEI 7 of the Hillingdon Local Plan: Part Two (2020) requires the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site.

The site is of fairly low-quality value and unlikely to be of interest to protected species given the lack of valuable habitat and natural features. A planning conditions requiring ecological enhancements is recommended if the application is considered acceptable.

7.14 SUSTAINABLE WASTE MANAGEMENT

Policy EM11 of the Local Plan: Part One (2012) requires all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

The applicant considers that as a commercially operated site, twice weekly collection is appropriate. This is in line with their overarching waste strategy for all the later living sites that they manage and avoids unnecessarily large waste stores being required within their buildings. A suitable commercial waste operator will be employed to collect the waste on this basis.

The units are primarily single occupancy residencies and are specifically designed for over 65s. The volume of waste likely to be generated by these residencies is therefore less than a standard family sized home. The site includes a number of additional services for the elderly residents including a cafe and restaurant where they can eat their meals (reducing their own domestic waste). Waste provision has been provided for both the residencies and the restaurant separately. In addition to the main refuse store, there are two smaller refuse stores adjacent to the cores which are filled up before the waste is transferred to the main waste store by management. The number of bins provided is considered to be acceptable. Where the refuse stores are accessed from outside, double louvred doors are provided to allow the space to be naturally ventilated.

The submitted Servicing and Delivery plan sets out details of the disposal of clinical waste. On the basis of the information provided, the Waste Management Officer has raised no objections to the application subject to conditions securing private waste collection from this development.

7.15 RENEWABLE ENERGY/SUSTAINABILITY

Policy SI 2 of the London Plan (2021) requires major developments to be net zero-carbon. Major development proposals are expected to include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided that an alternative proposal is identified and delivery is certain.

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The applicant's proposed energy strategy would ensure a 53% reduction in CO2 emissions over and above baseline Building Regulations requirements on the residential (domestic) element of the scheme, of which, 10% would be achieved through energy efficiency measures. The non-domestic element of the scheme would achieve a 67% reduction in CO2

emissions over and above baseline Building Regulations, of which, 15% would be achieved through energy efficiency measures. This exceeds the minimum on-site targets for CO2 emissions and energy efficiency performance which are set out in the London Plan (2021). The applicant's energy strategy comprises a range of passive design and energy efficiency measures, Air Source Heat Pumps and 200 photovoltaic solar panels (PV) at roof level. The remaining shortfall in CO2 reductions to comply with the zero-carbon target is to be secured via a carbon offset payment. Should the application be considered acceptable, a planning condition and a legal obligation would be secured.

7.16 FLOODING ISSUES

Policy SI 13 of the London Plan (2021) requires development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy.

Policy DMEI 10 of the Local Plan: Part Two (2020) applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

The site is located within Flood Zone 1 and generally has a low and very low risk of surface water flooding according to Environment Agency flood risk maps. A range of sustainable urban greening (SuDs) measures are proposed as part of the development including green / brown roofs, soft landscaping and shrub, tree and herbaceous planting areas, permeable paving and below ground storage attenuation tanks to provide the required quantum of surface water run-off storage attenuation capacity (295 cubic metres of attenuation). The outline drainage strategy includes green roof areas, rainwater harvesting, permeable paving and integration with the soft landscaping which should be retained during detailed design.

The Drainage Strategy is appropriate for this stage of design and acknowledges the information that is required to undertake the detailed design. Most notably, confirmation of the existing and proposed discharge point from the surface water drainage network. It is noted that previous application has sought to discharge into the highway drainage which is not appropriate, however this application assumes that a new connection into the Thames Water surface water sewer in Harefield Road would be required. Should the application be considered acceptable, detailed design of the drainage system should be secured by way of a suitable surface water management condition.

7.17 NOISE AND AIR QUALITY

Noise

Policy D12 of the London Plan (2021) places the responsibility for mitigating impacts from existing noise generating activities or uses on the proposed new noise-sensitive development.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The nearest noise source is the adjacent Penfield Estate located to the east of the site which comprises light industrial uses that are compatible with existing residential uses. The submitted acoustic report was considered by an independent acoustic consultant who has recommended planning conditions should the application be considered acceptable to protect both the neighbouring Penfield Estate and future occupants of the development.

The proposal includes commercial uses with residential uses above and as such, should the application be considered acceptable, it is recommended that a condition is secured to the operational hours for the commercial uses, should be between 07:00 and 22:00 and 09:00 and 18:00 on Sunday and Bank Holidays. Delivery and servicing is also conditioned to ensure it does not take place between 22:00 and 06:00 to protect the amenities of existing neighbouring residents and the future occupants.

Air Quality

Policy SI 1 of the London Plan (2021) requires development proposals to ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site.

Policy DMEI 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Council's EPU (Air Quality) Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to air quality enhancements.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

The proposed development is located with the Uxbridge Focus Area, bringing traffic and energy production emissions which will add to current levels of air pollution. The LBH Air Quality Action Plan 2019-2024 has been produced as part of the LA duties to manage local air quality. It includes measures that address the requirement to improve air quality within Focus Areas.

As per definition, Focus Areas are areas where current air pollution levels are unacceptable and current measures are not sufficient to reduce exposure and safeguard public health. Therefore, within Focus Areas, and as per the LBH Local Action Plan, a more stringent application of mitigation is required (measure 5). Given that current levels of emission are unacceptable in Focus Areas, new developments are evaluated by LBH not in relation to the

existing use, but in relation to the total level of emissions they originate within the Focus Area so that the suitable level of mitigation required is ascertained.

The operation of the proposed development originates 679 daily LDV trips which is a significant level of traffic circulating in the already congested Uxbridge Focus Area. In addition, the proposed development will include a diesel fuel oil emergency generator, which, as widely known across London Boroughs, can produce significant levels of pollution. The emissions are required to be mitigated. The updated air quality addendum mentions the applicant is considering to apply SRC (Selective Catalytic Converter) to the diesel backup generator with a 75% removal efficiency. Should the application be considered acceptable, this is to be secured via a condition.

Given the sensitive location of the application site in terms of air quality, new developments are expected to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor. The Air Quality Officer has recommended a damage cost of £69,262 to be secured by way of a legal agreement should the development be considered acceptable. In addition, two conditions are required to be secured should the development be considered acceptable to develop and implement a Low Emission Strategy and manage construction emissions as required by the Mayor of London.

7.18 COMMENTS ON PUBLIC CONSULTATION

Comments received are addressed within the main body of the report.

7.19 PLANNING OBLIGATIONS

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

i. necessary to make the development acceptable in planning terms
ii. directly related to the development, and
iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

Policy DF1 of the London Plan (2021) requires development proposals to provide the infrastructure and meet relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning

obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

All but one of these heads of terms have been agreed in principle with the Applicant, however, there is one matter that remains not agreed at the time of writing this report and this relates to the the affordable housing contribution.

1. Affordable housing £3,078,000 and an early and late stage review mechanisms in line with Policy H5 of the London Plan (2021).

2. Occupancy restriction to 65+ years requiring a minimum of 2.5 hours of care to secure Use Class C2.

3. To secure all necessary highway works including written agreement from the Local Planning Authority; (Section 278/S38 including works to provide appropriate improvements to kerbs and the adjoining footpath along Harefield Road and landscaping and tree planting as part of the proposals).

4. A car parking management scheme.

5. A full and formal Travel Plan with associated £20,000 bond to include a Sustainable Transport Measures is required to be submitted and agreed in writing by the LPA before occupation of the development. Thereafter, the Travel Plan is required to be reviewed annually to monitor and if required, update and/or amend the document to the satisfaction of the LPA, in order that its aims and objectives are achieved.

6. Parking Permit exclusion clause for all future residents for Uxbridge N Parking Management Zone U1 (other than blue badge holders).

7. Air Quality: in line with the SPD and given the site is located in an air quality management area, a contribution in the sum of £69,262.
8. Carbon Fund: a contribution of £99,473 for a carbon fund to make up for the shortfall for this development and in order to make the development policy compliant (£1800 for every tCO2/annum that is below the zero-carbon target).

9. A contribution of £900,229 for the provision of health facilities within the authority's area.

10. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered.

Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances.

11. Delivery and Servicing Plan for both the commercial and C2 use to include smaller domestic deliveries.

12. Healthy streets and active travel contribution £45,000.

13. Car club bays.

14. Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

Community Infrastructure Levy

This application is CIL liable with respect to the new floorspace being created. The Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 (plus indexation) per square metre of gross internal floor area to be paid. C2 uses are subject to a nil rate within the Hillingdon's CIL Charging Schedule.

7.20 OTHER

Contaminated Land

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The Contaminated Land Officer has commented on the application noting the information submitted in support of the application confirm the site has a history of contaminative uses, comprising industrial and commercial activities including "an iron works, unspecified depot, unspecified warehouse, builders' merchant, garage and vehicle repair centre, unspecified tank and electricity substation."

Mapping and tabulated information within environmental search details provided by Groundsure shows records of two tanks; the information suggests one may be situated on site and another off site in vicinity (20m) of the south eastern boundary. Further investigation is therefore required to determine whether or not underground tanks are present at the site.

The site is underlain with superficial strata of the Lynch Hill Gravel Member, designated by the Environment Agency as a Primary Aquifer, which represents controlled waters that are required to be protected accordingly. It is considered the land at the site is suitable for its current use as retail premises. However, the application involves a proposed change of use from commercial (retail) to residential property, the Contaminated Land Officer therefore

recommends that a supplementary geo-environmental investigation / risk assessment of the site should be conducted, in order to ensure all areas of land are further characterised and assessed in terms of identified contaminants. The geo-environmental assessment is expected to be structured and targeted in accordance with the proposed future planned designs and layouts for the proposed residential care home,

Having reviewed further information provided by the applicant, the Contaminated Land Officer is satisfied that the details concur with the conditions that is recommended to be imposed. The Officer is also satisfied the proposed course of actions, will be suitable to address the earlier identified objections and thereby ensure the land will be made suitable for the proposed change of use. In order for the Local Planning Authority to be suitably reassured that the proposed work will be conducted and reported in an appropriate manner, it is recommended conditions for land affected by contamination are imposed accordingly.

Fire Safety

Policy D12 (Fire safety) of the London Plan (2021) states that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. A fire statement has been provided which has been undertaken by qualified third party assessor. The report details how appropriate fire safety measures have been incorporated in the proposed design, layout, construction of the development, including means of fire detection and suppression, means of escape and access for emergency services.

Should the application be considered acceptable, a condition is required securing the implementation of a Fire Strategy for all parts of the development in accordance with Policy D12 (Fire safety) of the London Plan (2021).

Overheating Assessment

Policy SI4 the London Plan (2021) requires major development proposals to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

The energy assessment contains information on overheating. The updated report shows the development complies with the DSY1 requirements of London Plan Policy SI4 and the supporting energy assessment guidance. However, the development shows some failures against the DSY2 and 3 criteria (i.e. the more extreme heat events).

There has been an extensive study in London on the impacts of overheating on the elderly leading to a Care Home overheating audit pilot project. It is noted:

"The Mayor is concerned about the impacts of hot summers on older people. According to Public Health England (PHE) the three heatwaves in 2019 resulted in over 230 excess deaths across London. In one week in August 2019 (23-29 Aug) there were 108 excess deaths of people of 65 or older."

The supporting studies show that older people are particularly vulnerable to overheating with over 600 excess deaths reported following the 2003 heatwave (Criteria DSY2 for the overheating assessment). Whist it is accepted this is not a care home, the users are those that are vulnerable in heatwaves.

It is also necessary to note that extreme events are more prevalent. Consequently, planning solely for the base case (DSY1) is not prudent nor supported by the guidance. It is therefore necessary to ensure that the development is constructed and operated in a manner that is adaptable to these extreme events. The recommended condition is secured.

Health and Infrastructure

The NHS Healthy Urban Development Unit's (HUDU) Planning Obligations Model has been used to assess the cost of mitigating the direct impacts of the proposed development on the local health infrastructure in line with the NPPF and PPG, the London Plan and LB Hillingdon's policies.

The assessment is based on the number of units in the application (182) and the average age of the new residents being 77 as advised in the supporting information to the application. This places residents in the 75- 84 age range within the model. The capital cost for mitigation is calculated as £900,299.

The HUDU Model is a recognised and accepted methodology for calculating the contribution required to mitigate the impact on health from new development. The London Plan (March 2021 Chapter 11) states that boroughs should use the HUDU Model to calculate the contribution sought from developers to mitigate the impact of their development on health. The approach conforms with the NPPF and planning practice guidance regarding developer contributions. The applicants have agreed to provide the Health infrastructure contribution ibn full.

8. OBSERVATIONS OF BOROUGH SOLICITOR

General
Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

Planning Conditions
Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations
Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights
Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. CONCLUSION

The application seeks permission for the comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2), restaurant, cafe and a commercial unit (Use Class E) in buildings up to 7 storeys with car parking, landscaping and associated works.

The proposal has been amended in response to statutory and internal consultee comments. The amendments include revisions to the height of the proposed building, incorporating additional soft landscaping. The proposed wellness centre and commercial spaces have been reconfigured with the nursery omitted from the proposal.

The main considerations of the application are the principle of the development, quality of accommodation for future residents, affordable housing provision, design and appearance, impact upon heritage assets, impact upon neighbouring residential amenity, transport and highways implications, air quality and energy and sustainability measures.

The proposal would result in the loss of existing retail units, however their loss would not result in harm to the viability and vitality of the town centre. The provision of specialist older persons accommodation would contribute to meeting the annual benchmark of 180 units per annum set by the London Plan (2021).

Off-site affordable housing of £3,078,000 is proposed, this follows a review of the Financial Viability Assessment by an independent viability consultant who considers the scheme generates a positive land value of £3,078,000. On this basis, the proposal would provide the maximum reasonable amount of affordable housing.

The proposed development has been designed to cater for residents requiring care and support. The proposal provides communal facilities that would be accessible to residents and to the public, including a wellness centre and a separate commercial unit. Various uses within the development include the wellness centre, library, therapy and treatment rooms, which encourage social interaction. Positive weight is given to the social and community benefits arising from this scheme.

Impact to the level of daylight and sunlight of neighbouring properties has been fully considered following the submission of a daylight and sunlight report, which highlights minimal transgressions is considered acceptable within the context of the site. The protection of neighbouring privacy has sufficiently been mitigated through design and relevant planning conditions. Overall, neighbouring amenity is not considered to be unduly harmed by the development.

Following amendments to the layout, scale and height of the proposal is considered appropriate. The application proposal strikes an appropriate balance in terms of its height and scale and would provide an acceptable transition between this edge of town centre location and the suburban residential context to the north of the site.

The site has a high public transport accessibility level (PTAL) of 5. The development proposes some on-site accessible parking for future residents, dedicated mini-bus car parking, car club and drop off and pick up bays are also proposed. Car parking stackers are omitted from the proposal and therefore pressure on the internal access road has reduced and therefore the amended proposal, including internal road layout is considered acceptable.

Further information has been provided by the regarding overheating and the overheating methodology is considered acceptable.

Great weight has been attached to the delivery of specialist older persons accommodation, the weight given to all of the benefits arising from the implementation of the delivery of the proposed development, and the weight attached to all of the benefits arising from the scheme outweigh concerns relating to the overall height.

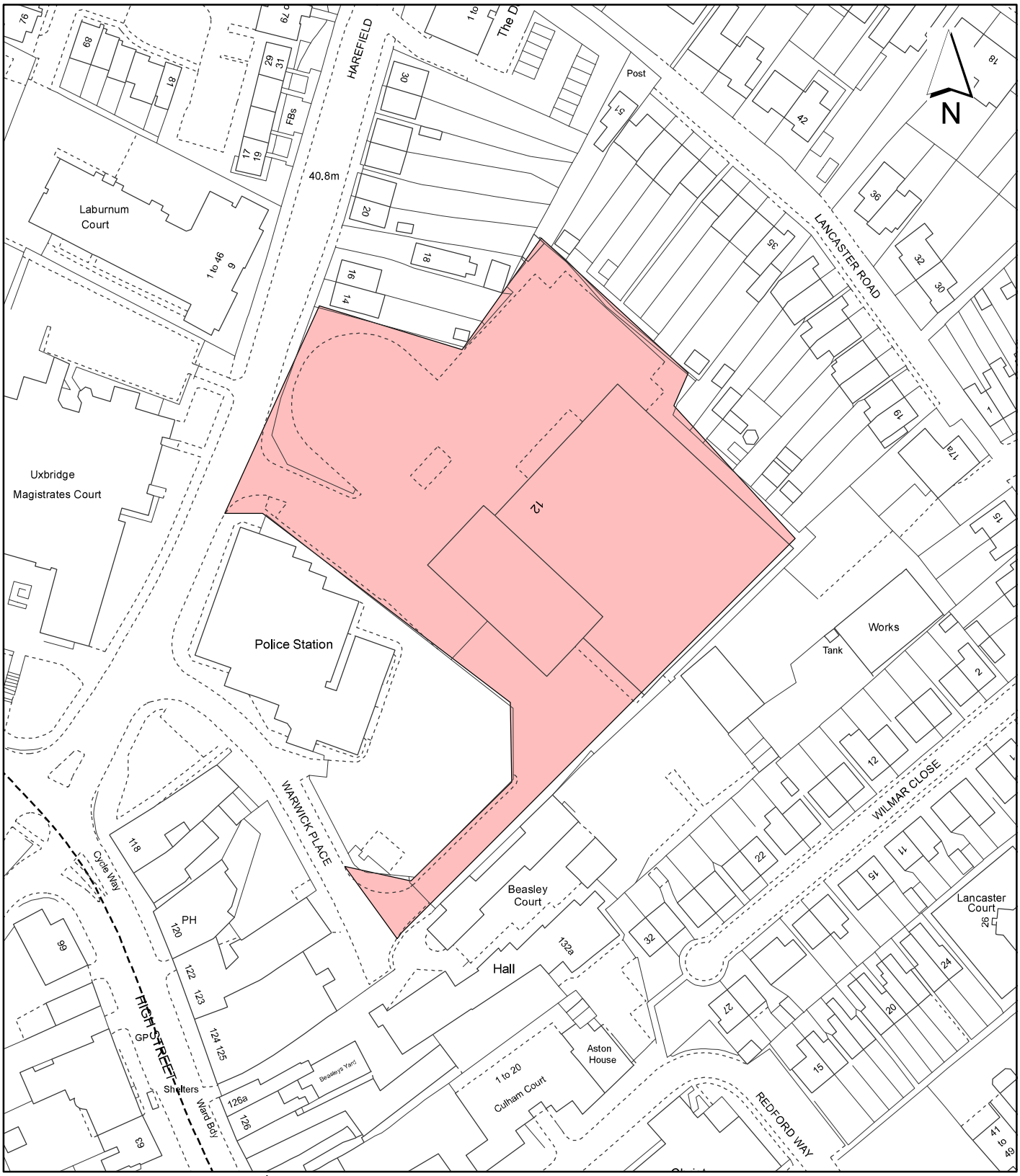
The NPPF (2019) identifies that there are 3 dimensions to sustainable development: social, economic and environmental. The social benefits of the scheme would include the delivery of a mixed-use development comprising 182 specialist older persons accommodation, a wellness centre, restaurant/cafe/bar and a commercial unit. The economic benefits of the scheme include employment during the construction phase and operational development and the ability for the future occupiers to support the local economy by using the amenities in Uxbridge. In terms of the environmental impacts, whilst the development provides public open space and amenity spaces for future residents.

Great weight has been attached the delivery of specialist older persons accommodation, the weight given to all of the benefits arising from the implementation of the delivery of the proposed development and taken as a whole, the proposed development accords with National, Regional and Local Plan policies and is recommended for approval subject to conditions and a S106 Legal Agreement.

10. REFERENCE DOCUMENTS:

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 Site Allocations and Designations (2020)
Hillingdon Local Plan: Part 2 Development Management Policies (2020)
Hillingdon Local Plan: Policies Map (2020)
London Plan (2021)
National Planning Policy Framework (2019)
NPPF Draft text for consultation (2020)
The Mayor's Housing SPG (2016)
The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)
Hillingdon Planning Obligations SPD (2014)
National Model Design Code (2021)
National Design Guide Planning practice guidance for beautiful, enduring and successful places (2019)

Contact Officer: Zenab Haji-Ismail



Notes:

Site boundary

For identification purposes only.

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Planning Application Ref:
16299/APP/2020/3313

Scale:
1:1,200

Planning Committee:
Major Page 123

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HILLINGDON
LONDON