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Urban & Rural Planning Solutions



SITE: UXBRIDGE UNITED WELFARE TRUSTS, WOODBRIDGE HOUSE, NEW WINDSOR STREET, UXBRIDGE, UB8 2TY.

PROPOSAL: DEMOLITION OF EXISTING ALMSHOUSE COMPLEX COMPRISING 20 NO. BEDSIT/STUDIO UNITS AND ASSOCIATED STAFF ACCOMMODATION AND ANCILLARY BUILDINGS AND CONSTRUCTION OF 30 NO. UNITS COMPRISING 20 NO. 1 BED REPLACEMENT ALMHOUSES, 2 NO. 2 BED STAFF FLATS AND 8 NO. 1 BED SHELTERED FLATS FOR RENT TO PERSONS OF PENSIONABLE AGE, STAFF/TRUST OFFICE & MEETING ROOM, RESIDENTS CAFÉ/SOCIAL ROOM, MOBILITY SCOOTER AND REFUSE ENCLOSURES, DISABLED, STAFF AND VISITOR PARKING, DELIVERY AND EMERGENCY VEHICLE PARKING/TURNING AREA AND ASSOCIATED LANDSCAPING.

FOR: UXBRIDGE UNITED WELFARE TRUSTS; REGISTERED CHARITY NO. 217066

PLANNING STATEMENT

URPS March 2016

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1.0 Introduction and Background

1.1 This Planning Statement seeks to analyse the aforementioned proposal's compliance with national and locally adopted planning policy and guidance. This analysis is informed by the findings set out in other specialist reports, enabling the degree of compliance with policy to be established, notably:

- *Design and Access Statement; Atelier Architecture & Design: (AAD)*
- *Heritage Statement; Alan Baxter Ltd*
- *Report of Building Deficiencies (Inc. within D & A statement): AAD*
- *Building Inspection and Report; Brasier Freeth*
- *Building Conversion Study (examining options to retain the existing buildings): AAD*
- *Shadow Analysis, Daylight Study and Vertical Sky Component Analysis; AAD*
- *Landscape Design Proposal (Inc. within D & A statement): Jeremy Rye Studio.*
- *Sustainability and Environmental Statement (Inc. within D & A statement) setting out the strategy to minimise energy use and waste; AAD*
- *Statement of Community Involvement (Inc. within D & A Statement) setting out details of public consultation on the project; AAD*
- *Access Statement; setting out the strategy to ensure inclusive use of the proposed building and compliance with Part M and Lifetime Homes Criteria; Aperis Building Consultancy Ltd*
- *Energy Report; Energy Assessment by reference to London Plan requirements; Environmental Economics Ltd*
- *Secured by Design Statement; adopting advice from Officer Ray Goodlett of the Metropolitan Police. AAD*
- *Fire Safety Planning Report; FCS Live*

1.2 Cross-referencing the findings in the above reports and relevant planning policy and guidance, this statement will gauge the acceptability of the proposal in respect of:

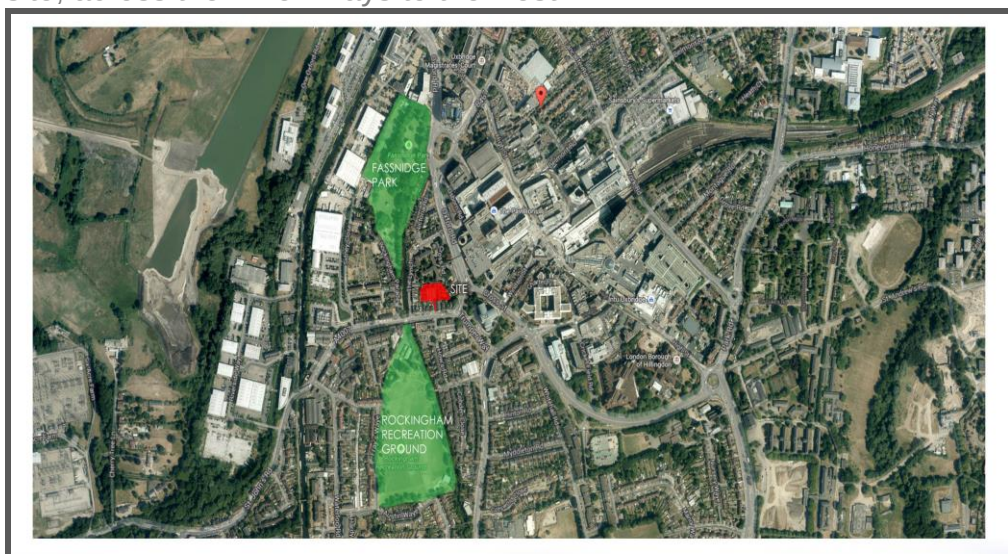
- *The Principle, including the heritage impacts*
- *The public benefit, by virtue of the nature of the housing type proposed, the need for it and UUWT's charitable obligations*
- *The presumption in favour of sustainable development and the aspects comprised within that*
- *The impact upon the amenities of adjoining occupiers*
- *Other development control considerations including access/parking, flood risk, SUDS strategy etc.*

1.3 The present proposal has evolved over a year and a half, during pre-application discussions with the LPA and consultation with residents living close to the site. The evolution of the scheme is extensively documented in Sections 6.0 & 7.0 of ADD's Design & Access

Statement. These sections set out in detail the feedback that has been received during this time, and the applicant's (UUWT-'The Trust') response in terms of scheme changes and provision of additional, supporting information and reports. This response includes preparation of a detailed examination into the feasibility of modifying the present almshouses, as an alternative to redevelopment, as a possible avenue to enabling The Trust to meet its 'Almshouse Branch' obligation to provide adequate, accessible, well maintained housing to those in need in the area of the former Uxbridge Urban District.

2.0 The Site and Historical Development of The Trust

- 2.1 The site and surroundings are described and evaluated in some detail in both AAD's Design & Access Statement and the Heritage Statement prepared by Alan Baxter Ltd. The latter also closely documents the historical evolution of UUWT from the amalgamation of a number of charitable organisations in the Borough to the single charitable body of today, including the provision of almshouses over the course of several centuries to development of the present site, Woodbridge House. In brief overview of the site and surroundings:
- 2.2 The site is located within 400 metres Uxbridge Town Centre, to the west of it. It comprises a secluded 'precinct', sitting behind buildings fronting New Windsor Street, from which the site takes pedestrian and vehicular access, The Lynch, to the west, and Lawn Road, Cross Road and Lynch Close to the north and east. The site is therefore quite concealed from public vantage points, the present building complex only being glimpsed through occasional gaps in surrounding street frontages and through the point of access in New Windsor Street. The immediate area is well served by public open space, both Fasnidge Park and Rockingham Recreation Ground are within 200 metres of the site, across the River Frays to the west:



The site shaded Red, Public Parks shaded Green, Town Centre and Uxbridge Underground Station a short distance to the east of the site



One of the few available public views into the site, via the site access from New Windsor Street

- 2.3 The site presently accommodates a 'U' shaped two storey building, the lower front elevations being finished in facing red stock brickwork, below painted, roughcast render to the upper walls, with steep pitched roofs over, finished in dark red/brown plain tiles. Timbered gables are a feature of the roof on the front elevations. The rear elevations are also finished in facing brick, yellow stocks in this case, below unpainted roughcast render but lack the embellishments of the front elevations and are fairly plain in appearance. The range has been extended and modified over the years, the front elevation having gained a glazed 'cloister' providing enclosure to ground floor entrances, and a centrally placed, large UPVC lobby connecting the cloisters, as framed in the view above.
- 2.4 The building faces onto a central surfaced courtyard, predominantly given over to vehicle parking and turning and open bin storage area with some soft landscaping to the periphery. Other areas of the site, to the north, east and west of the buildings, provide pockets of pleasant, soft landscaping. The only trees of significance (see site survey drawing E10 14) within the site are close to the eastern site boundary at the edge of the largest pocket of amenity space around the building, adjacent to houses in Lynch Close.
- 2.5 The site lies toward the centre of a pocket of residential development bordered by the ring road to the east, New Windsor Street to the south and the River Frays to the west. Comprised largely of C19th workers terraced cottages, there is also some later 1940's/50's infill semi-detached and terraced development toward the ring road and probably built when the ring road was under construction. The central area of this pocket is dominated by a later, contemporary 2 and 3 storey flat

development comprising 52 units, constructed in the mid 1970's (Ref; 20389/A/75/1317) and adjoins the northern boundary of the Woodbridge House site. The uncompromisingly contemporary design of this development, (addressed as Nos. in Lawn Road and The Lynch), adds interest and diversity to the character of the area, contrasting as it does with the period properties around it.

3.0 Present & Proposed Use, Tenure & Transitional Arrangements

- 3.1 The present development pre-dates modern planning legislation but occupancy of the almshouses is nevertheless strictly controlled by the Trustees, under the auspices of the Charity Commission.
- 3.2 Occupation is confined to those who are:
- Of pensionable age and above
 - Able to live independently
 - In need of housing or re-housing (those able to buy or let in the private sector are unlikely to qualify for almshouse accommodation)
 - And live, have lived or have had strong connections with the Uxbridge area.
- 3.3 In addition, no parking is allocated to residents within the site. The small number of spaces that are made available within the site are reserved for resident's visitors, staff and visiting care-providers (GP's, nurses etc).
- 3.4 Residents are not charged a rent *per se*, and are not, therefore, tenants, in law. They are granted a licence to occupy the premises and pay a weekly maintenance charge (WMC). Ultimately, the level of charge is at the discretion of the Trustees, guided by a 'fair valuation' by the Valuation Office Agency (Fair Rents Officer). Historically and at present, it is at a level around 80% of an open market rent for an equivalent property.
- 3.5 However, given as a separate grant by the Charity are: on-site, on-call staff/warden, use of laundry and social facilities on the site, all utilities (apart from phone) and provision of communal lunches several times a week, the latter also intended to foster a sense of community through social interaction between residents. The 'subsidy' against open market housing is, therefore, further enhanced through these additional benefits.

Proposed Arrangements

- 3.6 The proposed almshouses will be subject to exactly the same eligibility criteria as are presently applied and the paramount objective of the proposed scheme is to secure a significant enhancement in the quality and versatility of almshouse accommodation within the site. The

shortcomings and deficiencies of the present almshouses have been extensively documented in ADD's D & A Statement (Appendix A-Report of Deficiencies) and within the professional Inspection Report presented by Brasier Freeth Chartered Surveyors. In particular, the confined and undignified bed-sit configuration and compromised accessibility and adaptability of units mitigates against occupation other than by single, relatively mobile users. The Trust hopes the scheme will yield a legacy of fit for purpose, adaptable almshouse accommodation such that it no longer has to discriminate against couples in need and/or those with impaired mobility but nevertheless capable of independent living when provided with an accessible and adaptable environment.

- 3.7 The aim is to ensure the maintenance of charges below open-market levels and to continue to include the same benefits presently enjoyed by residents. Nevertheless, The Trust operates very flexibly and responsively on a case by case basis; in some instances, if presented with a case of great hardship, or a change in personal circumstances, the Trust may itself fund a significantly greater proportion of a resident's WMC.
- 3.8 The opportunity to both renew the aged and deficient almshouse stock on the site and continue to set charges at a level affordable to those in need, is highly contingent upon the realisation of the 8 additional non-almshouse units on the site, for 'open market' rental. Leaving aside for now the obvious planning benefits of securing an increase in sheltered residential units on an accessible, brownfield site, the rental income from these units both facilitates a manageable payback period on borrowings (avoiding public subsidy) required for the scheme, to prevent burdening the Charity for an excessive period of time and also preserves The Trust's other main objective of providing ongoing, charitable bequests. The Trust gives, on average, £150,000 annually to those in particular need, for example, paying for furnishings and appliances, covering crèche or child-minder fees to allow parents to get back to work, and includes grants for educational help.
- 3.9 The remaining 'open market', sheltered flats will nevertheless, in the interests of maintaining a socially compatible community, be subject to the same age and independent living criteria and restriction on resident's parking within the site. As with the almshouses, these units will also be available to couples meeting the criteria. Occupants of these units will not be in 'need' as such as they will have the financial ability to access market housing but they will, within the rental charge, enjoy the benefits of the warden controlled environment and can, if advantageous to their circumstances, have an intercom and 'Careline' communication system fitted in their apartments.
- 3.10 In accord with The Trust's charitable aims, whilst the objective behind the 8 'open market' rental units is primarily to enable a viable renewal of the aged almshouses and to aid continued charitable bequests, if

one of these units were vacant and The Trust was presented with a case of particular housing need or hardship, the 'open market' unit may effectively function as an almshouse to meet that need. Whether or not those circumstances arise, the Trust undertakes that at no time will any less than 20 of the units be occupied as almshouses under the Trust's long established protocols.

Transitional Arrangements

- 3.11 It is anticipated that through judicious re-allocation of resources, all present almshouse residents will be temporarily re-housed by the UUWT in various properties in the area, within the Trusts ownership, for the duration of the works. It is likely, therefore, that the present almshouse residents will be among the first occupiers of the new development. All will be entitled to return. Importantly the development and temporary re-housing will be managed in such a way as to avoid short term pressure on the area's affordable and/or Council-owned housing stock.

4.0 Impediments to Re-Use

- 4.1 The Trustees now consider the present Almshouses to have fallen significantly behind modern expectations and standards to the point where further attempts at modernisation are not seen as practical nor viable. The building deficiencies and the potential to overcome them by extension and modification of the present structure are examined in detail in the condition survey and report prepared by Brasier Freeth (6th March 2015). The report concludes that the present aged design shortcomings and building fabric are such that the present almshouses can be considered no longer fit for purpose. The surveyor's Interrogation of the potential to address these deficiencies through extension and modification of the existing range reveals that such would be impractical due to the extensive nature of work required, extended footprint that would result and inevitably compromised level of amenity/environmental performance that could be achieved.
- 4.2 This study by Brasier Freeth has been taken further by ADD through examination of a number of pragmatic options to adapt and extend the existing buildings. These detailed schematic evaluations are presented at Appendix C of the D & A statement-titled 'Building Conversion Study'. It is clear from examination of the existing ground and first floor plans and the options for modification that this layout permits, that there are severe impediments to wringing versatile, accessible units from the existing structure, whilst concurrently preserving unit numbers, the building's character and setting and the amenities of surrounding occupiers. These impediments include the shallow back to front span and the amount of space taken up with structural components within the layout requiring removal and structural remediation; large chimneys in the dividing walls between each bedsit, five individual concrete

staircases serving the first floor bedsits, existing building proximity to boundaries, substandard fabric etc.

- 4.3 As the Conversion study demonstrates, the four genuinely considered approaches to retention and improvement of the existing almshouses all present as imperfect solutions. A number of factors contribute to the chief issue which is the inability to avoid an overall loss of almshouse units. The shallow plan form requires deepening of the building which, in turn, reduces separation to boundaries, erodes amenity spaces and increases impact on adjoining properties and, even in trying to strike a balance between these negative impacts and a sufficient degree of enlargement to provide properly specified units, the best that can be achieved is 16 units, a loss of 4.
- 4.4 Only when bedsit units are partly retained in the layout can unit numbers remain close to existing with option 4 achieving 19 units. As with other options, the building footprint requires significant deepening, reducing amenity areas and space to boundaries. Leaving aside that all reasonable options carry significant compromises and fail to maintain the existing number of almshouses, significant costs are incurred in the extensive structural work required in removal of staircases, support of chimney stacks and upgrade of building fabric. It is unconscionable that The Trust would commit to that level of expenditure in the face of a net loss of almshouse units and irrational that the opportunity would not be taken when such expenditure is to be made, to augment elderly persons housing provision on this sustainably located, brownfield site.

5.0 The Proposal

- 5.1 The proposal involves the removal of all the present buildings on the site and the construction of a new almshouse complex, replacing the 20 existing almshouse bed-sit units, 2 No. 2 bed flats and a 3 bedroom house with 20 much improved one bedroom (almshouse) flats, 2 No. 2 bedroom flats for live-in staff. To assist in financing the modernisation of the almshouse stock, an additional 8 No. 1 bed flats intended for open market rental (not for sale), to persons of pensionable age and above, also form part of the scheme. These units also benefit from and are part of the sheltered, warden controlled environment.
- 5.2 The proposal is described and illustrated in detail within the D & A Statement prepared by ADD. It will be noted that the design has evolved during discussions with various Council officers and as far as possible responds to comments received following public consultation on the project. This background to and evolution of the scheme now presented is set out in detail at Sections 6.0 and 7.0 of the D & A Statement. Notable features of the scheme may be summarised as follows:

- The proposal largely confines development to the long established footprint set by the existing almshouse complex. Site/footprint coverage remains unchanged at around 36% of the site area.
- In so doing, development is not perceived as coming closer to boundaries with surrounding properties and indeed the proposal increases spacing to the western boundary.
- Closely following the existing developed footprint ensures maintenance of a key aspect of the site's character; the central courtyard layout.
- The proposal ensures this feature is available for its intended purpose for this housing type, as a focal point providing a, secure, secluded green space for quiet contemplation or social interaction.
- Only minimal, essential parking provision is made within the site, 8 spaces now located discretely by the western boundary.
- The arrangement of building heights and features has been informed by both Officer feedback and information taken from daylight and sunlight studies enabling an informed conclusion that surrounding occupiers should not perceive a markedly different scale of development from that existing nor should it impact significantly differently on their amenities in respect of privacy and daylight.
- All units will be Lifetime Homes compliant and meet Building Regulations requirements for future adaptability.
- The proposal draws on a materials palette that is appropriately sympathetic to the character of the area whilst avoiding slavish pastiche.
- The proposed design and layout draws on the 'Housing our Aged Population Panel for Innovation' (HAPPI) 10 principles for design for housing for older people (see Section 7.61 of the D & A Statement; ADD) and on award winning examples of well-conceived and successful 'elderly living apartments' architecture.
- Dedicated enclosures are provided within the proposal for storage of refuse, cycles and mobility scooters.
- All units may be regarded as meeting the need for sheltered housing for older people and at least 67% of the units (20 replacement almshouses) may be regarded as 'affordable' by virtue of the level WMC's are set at against equivalent open market rents.

6.0 Planning Policy & Guidance

- 6.1 The development plan, as relevant to this application, comprises the London Plan March 2016, the Hillingdon Local Plan Part 1, and the 'saved' policies within the Hillingdon UDP 1998.
- 6.2 Hillingdon's Local Plan: Part 2 which will contain site allocations and more detailed development management policies is due to be submitted for examination shortly. Policies at this stage may attract some weight, although no policies within this document are referred to by the LPA in its pre-application written feedback.

- 6.3 In addition, both the Government, London Mayor and the LPA publish planning guidance documents which, whilst not part of the development plan may be a material consideration in determining applications.
- 6.4 Regard has been had to the following in formulating the proposal and within this analysis:
- The National Planning Policy Framework (NPPF)
 - National Planning Practice Guidance
 - The London Plan March 2015
 - The Mayor's Housing SPG March 2016
 - The Mayor's Accessible London SPG October 2014
 - The Mayors Sustainable Design and Construction SPG April 2014
 - Hillingdon Local Plan: Part 1 – Strategic Policies, Adopted November 2012
 - Hillingdon Adopted UDP 1998, Saved Policies, as scheduled in Appendix 5 of the new Local Plan
 - Accessible Hillingdon SPD January 2010
 - Hillingdon Design and Accessibility Statement (HDAS) SPD – Residential Layouts July 2006
 - Hillingdon Rockingham Bridge Conservation Area Statement of Significance November 2012
 - Hillingdon Pre-Application Advice Note.
 - Community Infrastructure Levy Regulations 2014
 - Hillingdon SPD-Planning Obligations July 2014

7.0 Planning Analysis

The Principle - Use and Proposed Quantum of Development

- 7.1 In my view, consideration of the principle behind this development raises two separate but linked aspects. The first aspect is whether the proposed development is acceptable on its own terms, in respect of the use proposed and the general quantum of development. The second aspect is whether, in principle, this should be at the expense of the present Woodbridge House and the heritage issues its loss raises, having regard to the public benefits that might be identified as accruing through the proposal.
- 7.2 In respect of the proposed use, there is no dispute that the site is in a highly accessible location and falls within the NPPF's definition of 'previously developed land'. Its redevelopment meets squarely with the NPPF's core principle that planning should: *Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.*
- 7.3 Moreover, the proposal seeks to perpetuate a charitable almshouse/sheltered housing use that has demonstrated compatibility, in land use planning terms, with its residential surroundings over many

decades. Thus, redevelopment for the proposed purpose may be regarded as an entirely acceptable use, in principle, as confirmed in the LPA pre-app feedback: *The development in use class terms is considered an acceptable use on a brownfield site* (Officer written feedback-October 2015).

- 7.4 In respect of whether the general quantum of development (30 units set over 3 floors) is appropriate for the site, and generally acceptable in principle, the LPA will acknowledge that in seeking to increase the supply of housing on the site, the proposal responds to a strong policy background encouraging best use of previously developed sites and boosting the supply of housing. Notably, the LPA's adopted policy H3 in contemplating the redevelopment of existing housing, sets out the aim to increase supply:

POLICY H3; THE LOSS OF RESIDENTIAL ACCOMMODATION (WHICH COULD BE OCCUPIED WITH OR WITHOUT ADAPTATION) WILL ONLY BE PERMITTED IF IT IS REPLACED WITHIN THE BOUNDARY OF THE SITE. AN INCREASE IN THE RESIDENTIAL ACCOMMODATION WILL BE SOUGHT.

- 7.5 The London Plan (LP), its accompanying Housing SPG (March 2015 and March 2016 respectively) and the NPPF all set out the objective of optimising housing potential. As LP policy 3.3 indicates; *The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford*. The NPPF requires Local Plan policies and planning decisions to have the aim of ensuring that developments optimise the potential of the site to accommodate development. The Mayors Housing SPG explains that optimisation can be defined as:

Developing land to the fullest amount consistent with all relevant planning objectives.

- 7.6 Leaving aside the, acute and increasing under-supply of older persons housing, which I consider later, there is little doubt then that redevelopment proposals for Woodbridge House should, in the light of national, regional and local planning policies, explore and indeed aim to achieve an increase in housing provision through redevelopment of the site, having regard also to other planning objectives. As such, an objective assessment would assist in establishing whether in principle, if not in detail, the general quantum of development proposed is appropriate for the site. One such tool used in objective assessment is the LP's 'Sustainable Residential Quality Matrix'.
- 7.7 As the Mayors Housing SPG (March 2016) notes, density of development is:

...only one part of a wider policy to optimise development on sites in different settings, with different levels of public transport and accommodating homes of different sizes. The density ranges are sufficiently wide to accommodate the spectrum of policy considerations which must be taken into account when optimising development at a particular location.

- 7.8 On the one hand then, a development within the LP density range doesn't necessarily signal that the development is acceptable in other planning respects but it does provide a useful measure of whether a proposal would be over or under development in light of the character of the area, its degree of urbanisation and thus its accessibility. It can inform a view on whether a proposal is making best use of the site and appropriately 'optimising' the site's potential.
- 7.9 The London Plan Density Matrix recognises that higher densities are appropriate and indeed should be achieved in urban locations with good accessibility in the interests of using a scarce land resource in the optimum way. Hillingdon indicate in the emerging Local Plan Part 2 that, in applying the matrix at the local level:

Given Hillingdon's location and status as an outer London borough, it is considered appropriate that the application of the London Plan matrix will lean heavily towards the lower to mid-range of the density scales

- 7.10 Applying the LP matrix to the proposed development:

Site Area: = 2,725 sq.m. (0.27 Ha)

Density-Proposed Development (30 Units):

- 28 No. 1 bed units (kitchen/diner/living room space is 27 sq.m approx., plus bedroom) @ 3 habitable rooms each = 84 Hr.
- 2 No. 2 bed units (staff) @ 4 habitable rooms each = 8 Hr.
- Total proposed habitable rooms = 92

Proposed Density: = 111 U/Ha and 340 Hr/Ha

Density-Existing (23 Units):

- 20 No. almshouses (bed-sitting room 25 sq.m, kitchen 9 sq.m.) = 2 or 3 habitable rooms
- 2 No. 2 bed flats (one staff one rented) assumed 4 habitable rooms
- 1 No. 3 bed staff house: assumed 5 habitable rooms
- Total existing habitable rooms (almshouse = 2 Hab rooms) = 53 Hr/Ha
- Total existing habitable rooms (almshouse = 3 Hab rooms) = 73 Hr/Ha

Existing Density (almshouse @ 2 Hr) = 85 U/Ha and 196 Hr/Ha

Existing Density (almshouse @ 3 Hr) = 85 U/Ha and 270 Hr/Ha

- 7.11 The above figures are given context when analysed against the London Plan's 'Sustainable Residential Quality Matrix':

Site Location Confirmed as PTAL 4

Setting: characteristically Urban; predominantly dense development, between 2 and 4 storeys, within 800 metres of a District Centre.

Indicative densities by PTAL and Setting are 200-700 Hr/Ha and for smaller unit sizes (2.7-3.0 Hr/Ha), 70-260 Units/Ha.

- 7.12 Determining the point in the range the proposal falls, the density of 340 Hr/Ha sits significantly below the midway point (which is 450 Hr/Ha) in the indicative SRQM range and similarly in 'units per hectare' terms the proposed, at 111 U/Ha, is well below the mid-range indicative figure of 165 U/Ha.
- 7.13 It can be concluded that the proposal is a suitable density for the site, referencing its urban surroundings and high accessibility level (PTAL). Furthermore, the proposed density accords with the LPA's proposed 'local (outer London) weighting' in favour of the lower to mid-region of the ranges set out in the LP. The proposal neither exceeds the LPA's desired level nor fails to take the opportunity to 'optimise' use of the site through an increase in unit numbers. The proposal does not, therefore require particular justification in density terms. Such justification would be required for development proposals that both failed to meet the lower part of the range or appeared excessive, exceeding the higher part of the range.

Density-Adjoining Three Storey Flats

- 7.14 In order to provide some context to these figures, the proposed density is compared with the U/Ha density of the flat development adjoining the application site, to the north (52 units in 3 storey blocks, permitted in the mid 1970's). In this instance, site area is 3850 sq.m equating to a density figure of 135 U/ha, exceeding the proposed development for Woodbridge House by 24 U/Ha. The proposal thus better reflects the LPA's desire that densities should be toward the lower end of the range although neither this present proposal nor the adjoining flat development would be regarded as high density. This adjoining development is also, of course, within the Rockingham Bridge Conservation Area (RBCA) and appears to have replaced early C19 workers cottages, similar to those still evident along The Lynch, Lawn Road, Victoria Road and Bassett Road.

Site Coverage & Amenity Space

- 7.15 Other objective indicators that might inform a view on whether the quantum of development is, in principle, appropriate for the site are the

percentage site coverage and level of amenity space provision. Frequently, LPA's take a flexible view on the application of amenity space standards for development in more urban locations but equally, failure to meet adopted standards can indicate potential overdevelopment of a site.

- 7.16 In respect of site coverage, the proposed development footprint closely aligns with the existing almshouse development, in order to preserve the characteristic courtyard arrangement, separation to boundaries and peripheral amenity spaces that are features of the present layout. Accordingly, site coverage (area of site occupied by the building footprint) remains at around 36%. With nearly two thirds of the site remaining undeveloped, minimal parking located discretely to the western boundary (partly on the site of the present hall) and the central courtyard restored to a green space, the sense of space in and around the proposed buildings is maintained and enhanced. The development does not impose to any greater extent on site boundaries and, indeed, an increased separation is achieved to the western boundary.
- 7.17 In respect of amenity space provision, the Hillingdon Design and Accessibility Statement (HDAS) SPD-Residential Layouts, July 2006, sets out detailed guidance and recommendations on standards to be observed in the design of new residential development. In respect of amenity space for flats, the guidance indicates that: *Developments should incorporate usable, attractively laid out and conveniently located garden space in relation to the flats they serve*. The standards set out in the HDAS are proposed to be carried forward in the Local Plan Part 2.
- 7.18 The present balance of open space to building footprint isn't significantly altered by the proposal. To determine whether amenity space provision remains adequate in light of the additional units, the Council sets out a guideline figure for flats of 20 sq.m for 1 bed flats and 25 sq.m for 2 bed flats. If space is provided within balconies, this may be deducted from the requirement. The proposed development makes provision as follows:

HDAS Requirement: **28 No. 1 bed flats @ 20 sq.m = 560 sq.m**
 2 No. 2 bed flats @ 25 sq.m = 50 sq.m
 TOTAL HDAS REQUIREMENT = 610 sq.m

Proposed **Site Area = 2725 sq.m**
 Proposed Building Footprint = 991 sq.m
 All open space = 1734 sq.m
 Open space net of access road, parking, bin areas etc
 = 1085 sq.m.
 Space Comprised in Private Balconies = 53.75 sq.m

Total Proposed Amenity Space Provision = 1138.75 sq.m

- 7.19 It is apparent then, that the proposal comfortably exceeds the minimum guideline amenity space requirement set in the HDAS and proposed in the Part 2 plan, by some 87%. It may be concluded in this respect that resident's amenity space expectations for a new flat development in an urban area will be easily met and exceeded in the proposed development.
- 7.20 Added to the objective tests above, the results of the Shadow Analysis, Daylight Factor and Vertical Sky Component studies (section 5 of the D & A statement) indicate there is little change between the existing and proposed development as the additional storey is mitigated by its position and roof profile, relative to the present design featuring prominent, two storey, gabled outer wings. Summarising these findings:

Shadow Analysis

Both the proposed and existing developments have similar overshadowing, the proposal generally conforms to the massing and ridge height of the existing building and therefore the shading extent is comparable.

Daylight Factor Study

A simulation between the two massing conditions indicated that the proposed development will not have an impact on the daylight, sunlight or overshadowing characteristics of surrounding buildings compared with the existing site conditions

Vertical Sky Component Study

Neither the existing nor the proposed conditions impose on right of light. As none of the planes projected from the neighbouring buildings intersect with the building mass there is no breach to the VSC and the design conforms to right of light concerns

- 7.21 In addition to the objective analysis applied above, reference may also be made to building heights in the immediate vicinity of the site. This will further assist in determining to what extent the proposed redevelopment, comprising a second floor, might be seen as visually inappropriate in principle, or without precedent in its particular setting. In this respect it may be noted that there are developments both immediately to the north and south of the site set over three floors or of equivalent height. The photographs overleaf illustrate these developments; William Court flats, fronting New Windsor Street/Hows Road close to the site entrance, Newland House (former Methodist chapel-2 floors but equivalent 3 storey height) at the site entrance and the substantial flat development adjoining the site's northern boundary in Lawn Road/Cross Road.



Three Storey flats in Lawn Road-seen from Victoria Road-adjoining the northern application site boundary beyond.



Looking west into New Windsor Street with William Court flats on the left of the picture and Newland House on the right, next to the site entrance.

- 7.22 The above findings are presented as objectively as possible and support the conclusion that there is no particular aspect of the proposed scheme which would appear to render it inappropriate for this site. Density sits well below the median point in the LP Matrix, in compliance with the LPA's desired outer London Borough 'weighting', site coverage preserves amenity space that comfortably exceeds the LPA's guideline figure, shadow, daylight and sky analyses reveal that proposed scale and massing will not materially affect neighbouring occupiers' amenities and there is clear visual precedent set by development of similar scale and massing in the immediate vicinity of the site. I conclude then, that the building proposed in replacement of Woodbridge House does appropriately optimise use of this site and is, in its own right, acceptable in principle.

- 7.23 The other aspect of principle I refer to above is the loss of Woodbridge House and the consequent effects on designated and non-designated heritage assets, as distinct from the acceptability, in principle, of the development proposed to take its place. Turning to this other aspect:

The Principle-Loss of Woodbridge House & Consequent Effect on Heritage Assets

- 7.24 Whether the proposed development that would replace Woodbridge House is acceptable in principle, is examined above. In this instance, however, the building to be replaced, Woodbridge House, is 'locally listed' and acknowledged as making a positive contribution to a designated asset comprising the Rockingham Bridge Conservation Area (RBCA), designated in 2012.
- 7.25 In most cases of urban renewal, loss of a building on a site subject of redevelopment proposals will not raise a matter of principle in itself and the focus will be largely on the proposed replacement and its accord with planning policy. In this instance, of course, the focus is equally if not moreso on the loss of Woodbridge House. That the building makes a positive contribution means its removal must cause a degree of harm, both through the loss of the non-designated asset and the wider effect that has on the designated asset and its significance. In such circumstances, this harm cannot be acceptable in principle, or otherwise, unless it is clear that it is mitigated or outweighed by other considerations, namely benefits of some kind.
- 7.26 Both the LPA and The Trust regard Woodbridge House as a *relic*. For the LPA's part *relic* may be defined as *an object surviving from an earlier time, especially one of historical interest* whereas The Trust would infer the equally valid definition; *a thing that has survived from an earlier time but is now outmoded*. The LPA see the building as an integral and important element within the RBCA whereas The Trust see it as a burden and impediment to furtherance of their main, charitable obligation of providing almshouses which quite reasonably in The Trusts view should at the very least be available to the majority of elderly persons presenting 'in need' and not exclude, by reason of the age and design of the building, persons other than mobile singletons.
- 7.27 Both positions are valid, the loss of Woodbridge House causing both harm and accruing benefit through the resultant provision of highly specified almshouses and additional sheltered flats. If there were no benefit, the principle of demolishing Woodbridge House would clearly be unacceptable and if there are benefits, judgment is required as to their degree. The middle ground that would potentially appease both parties; the retention of the present building and its extension and adaptation, has in various forms been discounted as it cannot both produce adequately specified units and maintain their number, leaving aside effects on the building's character and impact on neighbouring

occupiers from deepened footprints (as examined in the D & A Statement and Surveyors Report).

- 7.28 The Heritage Statement accompanying the application charts the history of the charities in Uxbridge and the almshouse provision made on a number of sites, over the course of several centuries, up to the present day Woodbridge House. The features and qualities of the present almshouses are examined at section 2.4.2 of the statement and the alterations to them carried out by the Trust to extend the usability and longevity of the building are documented at 2.4.4. At section 3.3, comparison is made with other period almshouse groups to establish the relative quality of Woodbridge House. The significance of both Woodbridge House and the RBCA is assessed at sections 3.4 and 3.5. The impact on that significance resulting from loss of Woodbridge House is assessed at sections 5.3 and 5.4, having regard to the benefits.
- 7.29 Public benefits which can only be achieved consequent to substantial harm to a designated asset or that may outweigh lesser harm, are not defined as such in the NPPF. They are likely wide-ranging and may include both strong planning policy support for a particular development type and the development's degree of sustainability having regard to the three dimensions to, and presumption in favour of, sustainable development (see paragraph 20 of National Planning Policy Guidance). If the detailed exploration of options to extend and adapt the present building has failed to find a workable solution and the Heritage Statement finds that neither the loss of Woodbridge House nor the proposed replacement building would cause substantial harm then the acceptability of the principle of demolition of Woodbridge House perhaps becomes more finely balanced and the presumption in favour of sustainable development and other benefits will be pivotal. I explore this aspect further below:
- 7.30 The NPPF sets out the three dimensions to sustainable development: economic, social and environmental. Examining the contribution the proposed scheme makes to these three dimensions:

Economic Role

- 7.31 Although an economic role is more directly fulfilled by the planning system at the strategic level; ensuring sufficient land of the right type is available in the right place, at the right time, the proposal nevertheless has economic benefits on a more local scale. It meets locational land-use objectives for older persons housing, in being close to a wide range of services and facilities, avoiding a feeling of 'detachment' from the community.
- 7.32 Not only would the proposed scheme meet the objective of ensuring land of the right type is immediately available to secure an expansion in sheltered housing units, The Trust's provision of what is an expensive

housing type is achieved without direct cost to the Local Authority (LA). Elderly people are housed by The Trust reducing the burden and cost on the LA of supplying this specialist housing. The Trust works with the LA in placing elderly people in need in its almshouse accommodation when the LA has insufficient places of its own. Moreover, as noted before, the almshouse units are made available at a subsidised rate and with the additional warden and other benefits. It is through sound financial management of The Trusts other assets that places may be offered at Woodbridge House at the level of WMC they are, noting that the WMC's made by residents don't cover the operating costs of the present almshouses; maintenance, utilities, staff costs etc. The shortfall is seen as part of The Trusts charitable function and made up without contribution from the public purse.

- 7.33 Economically then, the proposal, in expanding the offer of elderly persons sheltered accommodation, makes a significant contribution to the Borough in reducing costs to the taxpayer in providing this specialist housing type. Moreover it is achieved on a site where that role is already well established and part of the community.

A Social Role

- 7.34 The NPPF sets out the social role as comprising:

..Supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

- 7.35 Noting that The Trust supports the Local Authority in meeting some of its housing need for elderly persons, reflects the wider London issue of accommodating an ageing population in the light of an acute and growing undersupply of specialist housing for this sector. This situation is acknowledged in the LPA's emerging Part 2 plan at paragraph 2.45, noting in respect the Borough's population aged over 65:

The population in this age bracket is predicted to increase by 7.1% in the next five years...These figures compare with a predicted 5% population increase for the rest of Hillingdon's population.

- 7.36 The emerging Part 2 policy relating to sheltered housing requires, inter alia, that;

...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.

- 7.37 The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. In terms of need and supply, LP policy 3.3 (Increasing Housing Supply) requires Boroughs to, inter alia:

...identify and seek to enable additional development capacity...in particular the potential to realise brownfield housing capacity through the spatial structure it provides including: intensification and sensitive renewal of existing residential areas, especially in areas of good public transport accessibility.

- 7.38 Policy 3.4 (Optimising Housing Potential) continues:

Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2.

- 7.39 Policy 3.5 (Quality and Design of Housing Developments) requires:

The design of all new housing developments should enhance the quality of local places....taking particular account of the needs of children and older people.

The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat', have adequately sized rooms and convenient and efficient room layouts, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives

- 7.40 Finally, in respect of *Housing Choice*, policy 3.8 requires Boroughs to ensure that:

..all new housing is built to 'The Lifetime Homes' standard; ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users;

..account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision.

- 7.41 In respect of housing for the elderly:

The Mayor has identified the growing and changing requirements for housing older people in London as one of the most important emerging planning issues. It is anticipated that between 2011 and 2036 'over 65s' could increase by 64%.

Research suggests that the choices open to older Londoners to move into local specialist housing may have been constrained through inadequate supply. Boroughs should demonstrate in their LDFs and other relevant strategies and plans how they have identified and addressed the local expression of these strategic needs.

These should be informed by the indicative requirement benchmarks set out in Annex A5

- 7.42 Table A5.1 at Annex 5 of the LP, entitled 'Specialised Housing for Older People' sets out an annualised benchmarks, by Borough, to inform local targets and performance indicators for specialist housing for older people (2015-2025). It is notable that Hillingdon has the 8th largest (of 32 Boroughs) annual indicative requirement for this housing type.
- 7.43 Concern over accommodating the increasing elderly population is mirrored in the Mayors Housing SPG (March 2016). Para' 3.7.2 notes this trend is *likely to be a long term, structural change in London society and have implications for the type of accommodation London needs to deliver and how the best use of stock can be ensured and a continuing concern for future Plan reviews.*
- 7.44 The SPG indicates that...*a variety of housing options are required to ensure older people's needs are met.* It further identifies that specific policies will be required to deliver:

Sheltered accommodation (also called retirement housing) (use class C3): self-contained residential accommodation specifically designed and managed for older people (minimum age 55) in need of no or a low level of support. Each household has self-contained accommodation and the schemes normally include additional communal facilities such as a residents lounge. A warden, scheme manager, community alarm/telecare or house manager interacts with residents on a regular basis and is the first point of contact in an emergency

- 7.45 The SPG notes the importance of location of specialist housing for the elderly in order to avoid isolation, particularly for the active elderly and the benefits deriving from greater housing choice for this sector in freeing up family housing they may presently occupy:

The needs of active older Londoners must be a particular consideration for LDFs in implementing the concept of 'Lifetime Neighbourhoods' in line with LP Policy 7.1. This recognises that good physical access to shopping and other services can enhance social relationships across the community at large and, in particular, redress isolation among older people. This makes town centre or edge of centre locations particularly appropriate for new, purpose built accommodation, especially for the active elderly.

LPAs should work with developers and providers to bring forward suitable sites to deliver specialist older persons accommodation. Town centres and other areas with good accessibility to public transport and facilities are likely to be suitable for specialist older person accommodation. More general housing needs can also be addressed by 'freeing up' some conventional housing through additional specialist provision for older Londoners who choose it

- 7.46 Finally, the Mayor's Housing SPG acknowledges the risks associated with provision of specialist housing and its vulnerability to failure and loss if not well managed and fit for purpose:

Consultants report that because of the ancillary services and layout required for new specialist older people's housing, development costs are usually significantly higher than for general needs housing, even when associated direct or indirect revenue streams are netted off.

The closure of existing specialist stock can occur for a range of reasons; failure to meet modern quality requirements, size- with high staff costs, economies of scale are increasingly important for efficient operation and/or susceptibility for change to higher value uses, especially mainstream housing

As with housing generally, the Mayor seeks to encourage rather than restrain development of specialist housing and, in line with NPPF requirements¹⁹⁴, this requires a thorough appreciation of viability.

- 7.47 It is evident then that the proposal supports a very strong social role; it replaces substandard, inaccessible and costly to run accommodation with a significantly enhanced sheltered housing offering, with charges predominantly subsidised by The Trust, in a location where the almshouse community is long established and benefits from the social cohesion of a central location. It addresses an acute and growing under-supply of sheltered housing, creating a greater potential to free-up family homes. It puts The Trust in a position to create a high quality environment that supports resident's health and social needs well into the future.

Environmental Role

- 7.48 Part of the environmental role is protecting and enhancing the built and historic environment. The LPA will acknowledge that the primary objective of the scheme is to preserve, enhance and extend long into the future, a thriving almshouse community on this site. As inferred in the Heritage Statement (Alan Baxter Ltd) it is this use, embedded into the social fabric of the area, that represents its greatest value and contribution to the significance of the wider RBCA. The *site* is The Trust's primary charitable asset, the bricks and mortar of the present Woodbridge House simply being a transient element in the

organisation's charitable almshouse provision, a feature of which, as the evidence shows, is its periodic renewal and upgrading.

- 7.49 The present almshouses, forming a pleasing arrangement though they do, are unremarkable in their outer elevations and heavily altered on their inner elevations (see Heritage Statement). The outer elevations are the predominant view seen by close neighbours and glimpsed from public vantage points. The proposal is the modern, accessible, adaptable and sustainable iteration of the almshouse use, preserving key qualities in its layout and capturing the essence of the character of the site and its contribution to the RBCA. The proposal should be judged, therefore, as one that preserves and enhances the established pattern of the historic environment; the site is not lost to anonymous general needs housing nor does the building have imposed on it a use that has no connection with its social history, rather the site's present beneficial use is enhanced through the creation of a modern, affordable, sheltered community, the social value of which is a very significant consideration.
- 7.50 Other aspects of the environmental role include using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy. Every opportunity is taken in the design and layout to achieve these goals. Maintaining the southern facing courtyard ensures solar gain to individual apartments is maximised, high performance building fabric ensures energy usage is minimised, such energy demands as the development does generate being partly met by the inclusion of an extensive PV panel array, sensitively sited on flat roof areas so as to minimise any intrusion of this technology into the wider RBCA (for further details see D & A statement and Environmental Economics Energy Report), increase in soft landscaped areas and incorporation of SUDS.
- 7.51 In addition, to accord with the latest housing standards set out in the Mayor's Housing SPG (Para' 2.1.12) units within the scheme fully conform to the Lifetime Homes Criteria. Further enhancement will ensure Part M 4 (2) of the Building Regulations (accessible and adaptable dwellings) is met and all units are also designed to be easily adaptable for wheelchair users in accordance with Part M 4 (3). Further details are provided at sections 3.0 and 4.0 of the Access Statement (Aperis Ltd). The proposal thus aims for adaptability and longevity, intending to make fit-for-purpose sheltered housing provision for, perhaps, the next hundred years. In that sense, it is intended to be a prudent use of resources, accommodating a much wider segment of the pensionable age population from the active just-retired, seeing these occupiers through to old age and reduced mobility, something the present almshouses cannot facilitate.
- 7.52 The proposal demonstrates a contribution to each of the three dimensions to sustainable development, in particular the social role

required of the planning system. The NPPF sets the presumption in favour of sustainable development noting it is a golden thread running through both plan making and decision taking. In respect of the harm to heritage assets, the weighing exercise requires significant weight to be given to development that is sustainable and the presumption in its favour. The planning system operates in the public interest and accordingly, development that strongly aligns with planning policy, notably, the three dimensions to sustainable development, must also result in significant public benefit (see NPPG).

The Principle-Summary and Conclusions on the Proposed Building and Loss of the Existing Buildings.

- 7.53 Above I consider whether, in principle, the proposed replacement for Woodbridge House may be regarded as acceptable. Seeking to address this objectively, I conclude that the proposal is demonstrably appropriate for the site in terms of its height, massing and density. It uses existing site characteristics to good advantage whilst the increase in sheltered housing provision meets the objective of adopted policy H3 seeking an increase in residential accommodation, whilst remaining at an overall quantum of development that is self-evidently moderate for its urban environment. In short, the evidence suggests that it meets the LP objective of optimising housing potential whilst avoiding a level of development that imposes itself to any significantly greater degree on its surroundings.
- 7.54 In respect of design, the careful consideration given to creating a high quality almshouse/sheltered development is illustrated extensively within the D & A Statement. Evidently, the design and layout draws on award winning examples of older persons housing schemes and is further informed by the HAPPI report and innovative designs referenced in this document. The D & A Statement outlines how the design incorporates features and a materials palette both echoing the present almshouses and providing a modern iteration of them. On areas where the LPA has provided constructive feedback or raised reservations on aspects of the proposed design, the design team have responded with appropriate amendments, as detailed in Section 6.0 of the D & A Statement. I conclude then that the LPA should find support for the development that would replace Woodbridge House both in principle and in respect of its design approach.
- 7.55 In respect of the principle of loss of Woodbridge House, a locally listed building, and the effect this has on the wider designated asset comprising the RBCA, a weighing exercise against the degree of harm is required, in respect of each asset affected. Factors of relevance to this judgment include:
- The site's relative lack of exposure to views from the public realm and the wider RBCA.

- The Almshouses relatively plain, economically detailed and finished outer elevations; those predominantly seen by surrounding occupiers and glimpsed from the public realm.
- The relative concealment of the inner elevations from the public realm and the wider RBCA.
- The relative 'expediency' of the design of these almshouses compared to other almshouse groups of the period as examined at Section 3.3 of the Heritage Statement.
- The marring of these inner elevations through the application of extensive areas of UPVC-framed glazing and the imposition of surfaced parking on the formerly landscaped courtyard.
- The evident obsolescence of the present design for its intended purpose of housing the elderly
- The intended objective of the proposal to perpetuate and enhance the contribution to the social fabric of the area and the RBCA in promoting an expanded almshouse and sheltered housing community on the site.
- The sense then that the contribution to the significance of the RBCA is as much if not moreso through the existence and preservation of the use of the site as through the existence of the present buildings.

7.56 Substantial harm, although not defined, is acknowledged to be a high test. It is clear that the proposal does not cause the *loss* of the designated asset comprising the RBCA. A view nevertheless has to be taken on whether loss of Woodbridge House (WH) would cause substantial harm to the RBCA. In light of the factors I outline above and the findings of the Heritage Assessment (Alan Baxter Ltd), whilst it is acknowledged that WH contributes positively to the character of the RBCA it cannot be said that it defines its character or that its loss would so erode its significance such as to cause substantial harm. The LPA's brief statement of significance prepared for the RBCA and supporting officer reports to committee proposing its designation do not suggest WH plays a vital, important or integral part (NPPG para' 18) in its significance, setting, or make up of its character or appearance:

It is felt that the character of the area is derived from the high density workers' terraces with decorative architectural details. The small front gardens and boundary treatments, along with the open spaces and riverside areas, are an important feature of the area (Report to Cabinet; 25th October 2012).

7.57 Acknowledging that the contribution WH makes is not directly linked to its prominence or otherwise within the public realm, the factors I set out above and the LPA's own statements on significance do nevertheless suggest that the harm to the designated asset from loss of WH must be regarded as less than substantial, as also concluded by Alan Baxter Ltd in its Heritage Statement.

7.58 Less than substantial harm to a designated asset should be weighed against the public benefits of the proposal, including securing its optimum viable use. In weighing the loss of the non-designated

heritage asset, Woodbridge House, the NPPF requires a balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset.

7.59 As noted in national guidance (NPPG) Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework. I have outlined these benefits earlier and they are very significant. To briefly recite:

- The proposal replaces units that are cramped and inaccessible to older, less mobile users and not capable of improvement through demonstrably viable adaptation, with highly specified, accessible units.
- It performs an environmental role in reducing energy usage and CO2 emissions, through good design, improved building fabric and energy generation on-site.
- It increases sheltered housing provision in a location determined by LP and Borough planning policies to be highly desirable for such uses, avoiding isolation and social exclusion.
- It provides 67% of units within the scheme at a recognised level of 'affordability'.
- It is financed without contribution from the public purse and directly supports the Local Authority's Housing Department in providing accommodation for the elderly.
- It addresses an identified and increasing deficit in specialist elderly housing provision in both the Borough and London-wide.
- It enables The Trust to maintain a use on this site that contributes importantly to the social fabric of Uxbridge.
- It enables The Trust to reduce present inequality and discrimination in the accommodation offers it is able to make.

7.60 I submit that the proposal demonstrably contributes in significant ways to the planning system's three roles set out in the NPPF, in particular the important social role and progress it encompasses. These aspects comprise clear public benefits of real substance and are in my view sufficient to outweigh the degree of harm consequent on the RBCA by reason of the loss of the present building on-site.

7.61 In addition, the proposed replacement building has not been found, in principle, to conflict with its Conservation Area context, as indicated in pre-application feedback. Design aspects that did raise reservations have been re-visited and the scheme amended to reflect comments made.

7.62 In respect of securing the optimum viable use, almshouses have been established at the site for over 100 years and the use is embedded in the social fabric of the area. Almshouses must be considered the preferred use for that reason. NPPG notes that: *It is important that any use is viable, not just for the owner, but also the future conservation of the asset.* Securing the optimum use in this instance requires enabling

the owner to develop a viable scheme and it has been demonstrated that this cannot be achieved through adaptation of the present buildings. I suggest that the interests of both The Trust and conservation of the RBCA are best served in this case by a proposal that both preserves the important social function established at the site and is seen as viable and operationally essential by the Trust.

- 7.63 In the weighing exercise required to be carried out I conclude that the public benefits are clear and significant and would outweigh harm, by reason of loss of WH to the RBCA. The balanced judgment required in respect of the non-designated asset may be regarded as subsidiary to the effect on the RBCA, the non-designated asset not having the force of statute, and I would consider the balance lies in favour of granting permission in order that the scheme benefits may be realised.

Substantial Harm

- 7.64 I do not consider, for the reasons given above and elsewhere, that the proposal would cause substantial harm to the RBCA. Nevertheless, it is a position on the degree of harm that the LPA may consider. LPA opinion on the degree of harm revealed through the pre-application process has yet to be fully informed through consideration of the full supporting package accompanying the formal application. Nevertheless, I consider this potential position below.
- 7.65 Should it be identified that a proposal would potentially result in substantial harm to a *designated* asset (the RBCA), the relevant test to be applied is set out at para' 133 of the NPPF. The test suggests that consent should be refused for proposals that would cause substantial harm *unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits*.
- 7.66 This infers a two-part test; a requirement to demonstrate that the public benefits would be *substantial* and, in turn a demonstration that they can only be achieved consequent on this degree of harm to the asset. Put another way, it would be for The Trust to show, if the LPA determine the loss of Woodbridge House causes substantial harm to the RBCA, that substantial public benefits could not be achieved in some other way, for example by retaining and adapting Woodbridge House.
- 7.67 Whether the LPA identify that there is substantial public benefit accruing from The Trust's plans may well partly depend upon whether it accepts The Trust's proposition that the housing in its present form is not fit for purpose as elderly housing. In that regard the deficiencies have been extensively reported in the D & A statement and Surveyors Report. The Trust are of course also obliged to have health and safety assessments carried out and on inspection by the Local Authority's Deputy Director of Social Care, Health and Housing, it was noted that 'falls associated with stairs and steps' comprised a Category 2 hazard for the over 60's, which of course comprises all present and future residents. Noting the

measures The Trust had already taken to reduce this risk, the Officer concluded; *we believe the only way to remedy the defect would be the demolition of the building as you have already made what changes you can.*

- 7.68 In light of all the deficiencies highlighted elsewhere and that The Trust are presented with a present and ongoing risk in relation to accessing 50% of the units, it should be common ground with the LPA that 'doing nothing' is not an option open to the Trust. The Trust's objective and duty is clearly to remedy the deficiencies and hazard for its user group of elderly occupants and that can only be achieved in one of two ways: Replacement with housing specifically designed for elderly persons, informed by modern approaches to design for this housing type, or attempting to achieve the same or similar result through further extension and adaptation of the present building.
- 7.69 It has been demonstrated in the work carried out by the Brasier Freeth in its surveyor's report and in the design team's consideration of options in the D & A statement that it is possible to achieve some of the objectives through extension and adaptation; creating units that are accessible and overcoming the stairs hazard but it is also clear that this more limited public benefit accruing from some enhancement of the accommodation does not have financially sound underpinnings; no reasonable balance can be found between overcoming deficiencies and hazards within an extended building envelope whilst maintaining viable unit numbers in a way that does not impose unacceptably on surrounding occupiers. Development costs cannot be offset by additional revenue from an increase in units whilst staff and other costs do not reduce significantly.
- 7.70 This is a critical consideration recognised in the Mayor's Housing SPG (see para' 7.46 above) that costs associated with specialist older peoples housing are considerably higher than for general needs housing and *economies of scale are increasingly important for efficient operation and/or susceptibility for change to higher value uses.*
- 7.71 There is also the associated risk of closure and loss of an important social asset on failure to meet modern quality requirements, again as the Mayor's SPG recognises. The 2013 Housing Learning & Improvement Network (HousingLIN) Report on 'Transforming almshouses for the 21st century' cites a number of case studies, noting one example in a market town:

There are ten bedsits and ten one-bed flats in a two-storey block built in a traditional Gothic architectural style in the 1920s. The almshouses were modernised 30 years ago, to provide night storage heaters (instead of coal fires) and en-suite instead of shared bathrooms. There are steps up to ground-floor units and no lift to the first floor. Five first-floor flats and six ground-floor bedsits are now empty. When the trustees asked the local district council for nominations, they were told

that their almshouse accommodation no longer meets the standards required for sheltered housing.

This example summarises the problems facing many medium-size almshouse charities, including those with sheltered housing:

Housing that is well-located and in good repair but includes bedsits, No longer meets current requirements (e.g lift, level access) and is no longer in demand by older people.

WMCs similar to other sheltered housing, but a reducing income stream because of increasing levels of void properties

The possibility that the almshouse site will be sold for redevelopment and lost as potential affordable housing;

An asset (the extensive grounds) which could allow for an extension or redevelopment to HAPPI3 or extra-care standards, if planning permission and finance were to be obtained

- 7.72 It is worth noting that, in this example, there is some potential for a viable outcome through ‘extension’ as the almshouses benefit from ‘extensive grounds’, provided funding can be found. In the case of Woodbridge House this has been shown not to be feasible because it fails to strike a workable balance between the level of accommodation that can be provided and site constraints.
- 7.73 In weighing up these considerations then, it seems clear that The Trust only has one practical and viable avenue open to it if it is to be able to address its present issues and ensure dignified, fit for purpose alms-housing into the next century. The scheme, providing for 8 additional sheltered units and subsequent additional revenue and economies of scale, is necessary therefore to achieve all the public benefits highlighted earlier, most importantly amongst them securing the almshouse use for many years to come and its contribution to the social fabric of the area.
- 7.75 The evidence ‘on the ground’ is that The Trust has over the years invested significantly in the 1906 almshouses to maintain a reasonable and dignified standard of accommodation, working around the constrained bedsit plan. But ‘working around’ is no longer considered socially or ethically viable for a prominent charitable organisation in the Borough. It is seen as essential to aim for high standards in housing those in need. This allied to the financial commitment required of The Trust strongly mitigates against retention of the existing building and if its loss is regarded as causing substantial harm to the RBCA it is demonstrably necessary to achieve the very significant benefits.
- 7.76 Given the Trust’s charitable objectives, providing housing for the elderly in need in the Borough, it is clear that realisation of the proposal will be

both to the benefit of the public and substantial. This together with the other benefits that accrue justify the harm and meet the test at para' 133 of the NPPF. Accordingly, the proposal would be compliant with emerging policy DMHB 1 (ii), if this level of harm is identified, as it is outweighed as the policy requires.

Cases of Interest

7.77 By way of further illustration of some of the above points, I cite excerpts from several cases where similar considerations have been applied by LPA's considering almshouse redevelopment proposals. I would not describe these as 'precedents' because each case should be weighed on its own merits and considerations will be particularly discrete where heritage assets are involved.

7.78 The first case concerns 4 almshouses of 'local interest': Mill Lane, Newbury. Demolition of terrace of 4 No. 1920's almshouses and construction of 16 No. 1 and 2 bed flats:

- *Newbury has a rich heritage of almshouses, and has many fine examples dating from the C17th. The almshouses houses at Mill Lane date to the late 1920's (there is a construction date of 1928, located on the front central projecting gable). Whilst these almshouses are of local historic interest (due to the role they play in Newbury's social history) they are not of particularly high architectural quality, in terms of their design, quality of materials and inappropriate modern alterations such as upvc replacement windows*
- *The fundamental aim of almshouses is to provide those in need with a high standard of affordable housing within their local community. The current application would contribute significantly towards this aim by providing an additional 12 affordable homes to be run by the Charity of Mrs Mabel Luke. Therefore continuing Newbury's heritage of providing charitable housing for those in need.*
- *I consider that the harm caused by the loss of these relatively modern almshouses, of limited architectural quality, is outweighed by the substantial public benefits of providing 12 additional affordable homes.*

7.79 The second case concerns Winnock Almshouses, Military Road, Colchester; demolition of 7 No. locally listed almshouses (within the setting of a Grade I listed almshouse terrace) and construction of 10 new dwellings. English Heritage comments:

The seven almshouses of the 1930s are not of the same interest (as those listed Grade I) and are not nationally listed; but they are recognised by local listing, and they contribute to the setting of the 17th century almshouses and to the interest of the larger group of almshouses. The loss of the almshouses would cause some harm to

the setting of the 17th century range, and thereby modest harm to its significance.

7.80 In weighing up harm and benefits the officer report notes:

- Architecturally, the 1930 almshouses are built in a simple Neo-Tudor style and replicate the design of the earlier almshouses on the north side of Military Road. Whilst the front façades remain relatively unaltered, the insertion of plastic windows has had a detrimental impact on the appearance of the almshouse). Rear extensions have added to the almshouses and the interiors have been subject to alteration which has stripped almost all original features from the buildings. Given their plain design and extent of alterations, the 1930s almshouses are considered to have medium to low aesthetic value*
- The demolition of locally listed buildings is an unusual step and rarely acceptable in principle unless there are overriding reasons why this should be appropriate. In this case, the agent has explained that the 1930s almshouses provide cramped living accommodation and are not fit for purpose as they do not provide the separate bedroom and sitting room required under current standards. Internally the almshouses are also awkwardly laid out so that they are not suitable for wheelchair users. The Charity that owns the almshouses is required to use the site for accommodating older people and cannot use the buildings for other purposes. In view of this, the Charity has two options: namely to refurbish and extend the existing buildings or to build new units of accommodation. The first option would not only be unlikely to resolve the existing problems of poor internal layout but would also compromise the external appearance of the building and in doing so further undermine their aesthetic value.*
- In this instance, given the unique circumstances of this case, it is considered that the principle of demolishing the locally listed buildings can be accepted.*

7.81 In both cases, permission was granted for redevelopment. I conclude that the harm in this case is, as found through Alan Baxter's Heritage Assessment, less than substantial and is clearly outweighed by the public benefit. Even if the harm is found to be to a greater degree, the necessity to carry out the development in the form proposed and the substantial benefits that will flow from that, provide a compelling argument in its favour. I now turn to the remaining planning considerations discussed or highlighted during the pre-application process:

Affordable Housing

7.82 UUWT is a charitable housing provider. The present and proposed almshouses do not necessarily accord with the formal definitions of 'affordable housing' set out in the NPPF or Policy 3.10 of the London

Plan March 2015 because of the charitable nature of the organisation and the nature of the tenure, as described before. Nevertheless, the proposed 20 No. Almshouses effectively comprise social or affordable rented housing within the scope of the definition because the WMC's are set at a level around 80% of the local market rent and the units are thus accessible to persons, in this case of pensionable age and above, unable to access open market housing.

- 7.83 The 8 No. sheltered flats effectively comprise intermediate housing because although rent or WMC's for these units may be set at a level equivalent to local market rent, these units will benefit from the sheltered environment, café/social space, warden assistance, and care-line intercom system, if required. Specialist sheltered housing is both costly to build, staff and run. In the private sector, these units would attract a premium over general needs housing but that is not intended for these units within the proposal. Indeed, The Trust see these 8 additional units, as well underpinning scheme viability, as having the potential to be occupied as almshouses in cases of particular and pressing need.
- 7.84 Arrangements are intended to be flexible in respect of the proposed 2 No. 2 bed staff units which will, more than likely be provided with a degree of subsidy depending upon individual circumstances. At present, there is a full time warden living on-site, available on-call to residents 24 hours a day, 7 days a week and a cook/assistant warden providing meals and warden cover. Both are provided with accommodation, in one case without charge and in the other, at 'peppercorn rent'.
- 7.85 The London Plan 2015 (policy 3.11) no longer imposes particular site thresholds or target percentages for affordable housing but instead encourages Boroughs to 'maximise affordable housing output' in order to meet an annual, London-wide target of 17,000 affordable homes. In turn, Boroughs are required to set an annual target in their LDF's for the amount of affordable housing needed over the plan period.
- 7.86 Responding to that requirement, the Hillingdon Local Plan: Part 1, Adopted November 2012, Policy H2 requires that for sites with a capacity of 10 or more units, the Council will seek to ensure that the affordable housing mix reflects housing needs in the Borough. The Council's Economic Viability Appraisal (EVA) indicates that subject to site circumstances and viability, 35% of all new units should be delivered as affordable housing.
- 7.87 Of the proposed development of 30 units, 20 (67% of the total) will comprise the Trust's renewed charitable almshouse stock. In light of the above, that may be regarded as continuing to make a significant contribution to affordable housing in the Borough, as the LPA will acknowledge. Although the number of almshouse units is not increased in the redevelopment it should be highlighted that the present bed-sit

units, seen by The Trust as only fit for single occupancy and only offered on that basis, will be replaced by larger units conforming to modern accessibility and space standards for elderly housing and designed for 2 person occupancy. Whilst a number of the almshouses may, of course, continue to be occupied by singletons, particularly in the shorter term as existing single occupiers are assured of a flat within the new development, the proposal will provide a potential doubling in occupancy capacity, being able to provide accommodation for couples in need in the Borough.

- 7.88 I submit then that the proposal demonstrably meets the requirements of adopted policy H2 and, accepting that the tenure arrangements are somewhat unique to charitable institutions and almshouses, also meets the spirit of the desired tenure split of 70% housing for social rent and 30% intermediate housing, between the 20 almshouses and 8 No. sheltered flats.
- 7.89 Finally, it is acknowledged that the unique arrangement particular to almshouses and the charities that run them does not lend itself to precise definition or standard tenure arrangements. The LPA may, of course, be assured of The Trust's (and earlier incarnations of it) commitment to almshouse provision in the Borough over centuries and be satisfied that UUWT's own charter is a secure and reliable controlling mechanism to ensure the continued provision of housing to those in need, without the need for imposition of conditional or legal controls by the LPA. If the LPA is minded to grant permission and considers otherwise on this point, UUWT would request discussion on the form of any proposed control to ensure it is not fettered in its ability to respond to pressing cases of need or otherwise prevent some flexibility in the way accommodation is managed and occupied.

Access and Parking

- 7.90 It is not apparent whether the LPA consulted the Highway Department during the pre-application process in respect of access or internal circulation arrangements. The point of access from New Windsor Street will continue to be used in its present form and traffic entering and moving around the site will be light and infrequent as residents are not permitted to park within the site and that restriction will remain in place for the proposed development. In the absence of any specific pre-application comment from the LPA concerning access and internal circulation, it is understood the LPA is satisfied the proposal is acceptable in these respects.
- 7.91 In respect of the proposed parking provision which is referred to in pre-application feedback, The London Plan and the Mayor's Housing SPG, provide up to date guidance on the approach to and expectations for car parking provision within residential schemes in the Capital. The expectation is that the *maximum* provision for 1-2 bed units should be *less than 1 space per unit*. Additionally the SPG advises:

Account should also be taken of the planned social composition of a development and its bearing on parking demand, more general changing attitudes towards car ownership and use, and the need to coordinate on- and off-street parking provision to address local amenity, congestion and safety concerns....Car-free developments should allow space for drop-off, emergency access and deliveries, and meet the needs of disabled residents and visitors

- 7.92 The Trust has always operated a restricted parking policy on this site. The site is within a few minutes' walk (see Section 2.8 of the D & A statement) of excellent public transport services and the full range of other services and facilities characteristic of a metropolitan centre, around 400 metres from the site. Residents are not reliant on a vehicle to access this broad offer. Additionally, as the site runs as a sheltered/warden controlled environment for older people, GP and Nurses visits are arranged by staff as necessary. The combination of these factors has always allowed the development to function without inconvenience as a largely car free development, providing just the 'operational minimum' of spaces for staff and occasional visitors, including carers.
- 7.93 Occupiers of the 8 open-market sheltered units will also be subject to the same restriction on parking on-site. Whilst these occupiers are not 'in need' and can afford an equivalent local market rent, they will be of state pensionable age or older and be attracted specifically by the benefits of the sheltered housing environment and central location. This environment coupled with the restriction on on-site parking would suggest that these occupiers will either be non-car owners or encouraged away from car ownership, seeing it as unnecessary. For these reasons, it is not considered that occupiers of these 8 units will contribute significantly to demand for on-street parking in the local area.
- 7.94 Officer's indicate in pre-application written feedback that as the site is highly accessible (PTAL4), minimal parking should be provided on-site, no doubt to discourage car use and encourage travel by other means. This advice is reflected in the proposed provision of 8 spaces within the scheme, seen by The Trust as the 'operational minimum' to accommodate staff needs and occasional resident's visitors and carers. Of these 8 spaces, 2 are provided for wheelchair users and one bay will feature an electric vehicle charging point. Separate provision is made adjacent to the main entrance for temporary stopping and turning for refuse and delivery vehicles etc.
- 7.95 In light of the restriction on residents parking, traffic movements are infrequent throughout the day and the existing access from New Windsor Street has not presented any problems in accommodating that level of movement nor for larger vehicles occasionally servicing the site. It is not anticipated that the proposal will present any highway

safety issues, nor materially increase demand for on-street parking in the area. I submit that it is consistent with the aims of LP policy 6.13.

Refuse/Recycling

- 7.96 An enclosed refuse and recycling store is proposed at the head of the access road, to provide convenient access for refuse trucks. This replaces open bin storage presently on this part of the site. The store has been sized to accommodate separate refuse and recycling receptacles.

Sustainable Design & Construction: CO2 Reduction & Water Resources.

- 7.97 The LPA during pre-application discussions, highlighted the LP requirement, set out at policy 5.2, that the development should aim to achieve a 40% reduction in CO2 emissions against the 2010 Building Regulations and requested a full energy assessment illustrating the strategies employed to achieve this. The assessment, carried out by Environmental Economics Ltd accompanies the application.
- 7.98 As the D & A statement and energy assessment (EA) indicate, following assessment of the proposed measures including heat recovery and high performance building fabric, further energy saving to reach the LP target needs to be achieved through renewable energy generation on-site. This is best achieved through solar 'PV' panels as discussed in the EA. As noted at section 5.3 of the EA, achieving the 40% target would require some 120 sq.m of PV panel-area. Much of this can be accommodated on less conspicuous flat-roofed areas within the proposed design but also necessitates siting on main, pitched roof planes.
- 7.99 There is, of course, a visual implication arising from siting PV panels on the main roof slopes as they may appear visually intrusive from the surrounding RBCA, introducing areas of different surfacing and texture within the otherwise consistent slate roof finish. In circumstances where the introduction of such technology may have undesirable visual consequences for the character and appearance of designated areas, English Heritage set out that exemption from the requirement may be made:

...to the extent that the requirements would unacceptably alter the character or appearance of such buildings.

- 7.100 This guidance is reflected in LP Policy 5.2 E:

The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu

contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.

7.101 The design team has thus taken the decision to avoid placing PV panels within the main pitched roof areas and instead, sought to maximise the panel-area within less conspicuous flat- roofed areas. The distribution of panels is illustrated at Section 4.14 of the D & A statement-roof plan. Together with the high performance building fabric this enables a CO₂ reduction of 21% to be achieved. It is considered, therefore, that the proposal strikes a reasonable balance between reducing the LP objective of minimising CO₂ emissions and protecting the visual quality of the RBCA.

7.102 It is noted that policy 5.2 E makes provision for on-site deficits against CO₂ targets to be made up through off-site provision or financial contribution to achieve the same. However, in light of the applicant's charitable status, it would essentially require monies from the benevolent fund being diverted for that purpose; robbing Peter to pay Paul, as it were. There is no 'developer profit' in the scheme and all surplus monies the charity has are used in the running and maintenance of its properties and in bequests to those in need. In light of that, the LPA may consider that the proposal makes suitable provision for CO₂ reduction within the scheme, particularly in view of the motivation to obviate PV-panel intrusion in the RBCA. Equally, if the LPA consider there may be scope for siting additional panels, that will be actively considered by the design team.

In respect of water resources, LP Policy 5.15 B (a & b) requires new developments to incorporate water saving measures and equipment (a), with the aim of restraining mains water consumption to 105 litres or less per day, per head (b). The D & A statement confirms at Section 5.7 that such measures will be incorporated within the proposed development in compliance with this policy. The design stage will identify specific measures which may be considered by the LPA pursuant to a suitably worded condition.

Flood Risk & SUDS

7.103 The site is located within a short distance of the River Frays. This 'river' is believed to be a man-made diversion of waters from the River Colne, historically to feed watermills around Uxbridge. It is a semi-canalised short river branching off the River Colne at Uxbridge Moor and rejoining it at West Drayton.

7.104 Anecdotal evidence following inquiries of staff and residents at the site (going back to 1993) is that there are no known incidents of flooding, either river borne or localised within the site, over this period. The EA Flood and Flood Warning Area Maps indicate the site is neither in a flood warning area nor on record as having flooded in the past. The probability of flooding appears very low and would not appear to

require further investigation. The LPA confirm in its pre-application response that a flood risk assessment is not required in this instance.

- 7.105 The LPA do however suggest the site is susceptible to surface water drainage issues and indicated that SUDS should be incorporated within the site layout, consistent with the approach in LP policy 5.13- *Sustainable Drainage*. A proposed SUDS arrangement is illustrated at section 5.7 of the D & A Statement. This shows the construction method by which surface water run-off will be attenuated, avoiding imposition of additional load on the local drainage network. In addition, surface permeability within the site will be further improved by an increase in soft landscaping, through restoration of the presently surfaced, central courtyard as a planted space.
- 7.106 It is considered the above approach is consistent with the objectives of LP policy 5.13. The design stage will consider the SUDS arrangement in more detail and the final specification may be provided to the LPA pursuant to a condition, if required.

Archaeology

- 7.107 The site falls within an area designated as an 'Archaeological Priority Area' (APA). The LPA did not identify any specific information requirements during pre-application discussions. It is understood that GLAAS will be consulted on the proposal at application stage and the applicant is agreeable to attend to any information requests that are presented during the consultation process.
- 7.108 In initial assessment of the HER, the Heritage Adviser's preliminary view of archaeological potential was:

The archaeological interest of Woodbridge House and its site is very limited. The evolution of the standing fabric itself is not especially interesting and requires little specialist investigation to be understood. The Greater London Historic Environment Record (Appendix B) records no known below-ground archaeology finds in the area of Woodbridge House (Alan Baxter Limited; Heritage Statement July 2015).

Trees & Landscaping

- 7.109 Main trees on the site have been accurately plotted on the site survey drawing and are illustrated on the proposed ground floor/site layout plan No. 447/TP/001. The relationship between the existing and proposed building footprints is shown on this drawing (existing shown dotted) and can be seen not to vary significantly. For this reason, the main trees toward the eastern site boundary would not be prejudiced by the development and protective fencing can be provided in this area to prohibit storage of materials or machinery access. An indicative root protection area is shown on the Constraints Diagram at Section 2.6 of

the DAS and in agreement with the LPA's landscape officer, this may be referred to in any condition requiring protective fencing. Otherwise this part of the site is a pleasant green space and no alteration to it is proposed other than any necessary restorative works following construction.

- 7.110 As requested by the LPA in its pre-application feedback, a 'landscape master-plan' accompanies the application, focussing on the area of main change; restoration of a central, landscaped courtyard, taking the opportunity as policy would support, of enhancing local character and distinctiveness of the natural and built environment. The plan, prepared by the Jeremy Rye Studio, is presented at Sections 5.21-5.23 of the DAS. The rationale and objectives are set out and the result is a multi-functional and multi-sensory space created in the heart of the development, views of which are available from the main point of outlook from all apartments.
- 7.111 In addition to the restoration of this principal almshouse-layout feature from its present use as surfaced parking, other 'operational' facilities comprised within the development have been carefully considered. Presently open bin storage near the site entrance will be now be housed within a traditional, pitched roof outbuilding. This along with enclosures for plant and buggies and bikes will be finished in the same high quality facing brickwork and slates used on the main building. Car park surfacing will comprise red brick paving to tie with the brick detailing in the main building.
- 7.112 Accordingly, I submit that proposals for landscaping and handling other aspects of the building surroundings demonstrate careful consideration and take opportunities for site enhancement as sought in Section 11 of the NPPF and the LPA's HDAS guidance.

Crime Prevention-Secured by Design

- 7.113 The design team have sought the advice of the Met Police Designing out Crime Officer and the matters taken account of are detailed at Section 7.4 and Appendix H of the DAS.
- 7.114 The layout provides excellent natural surveillance of the surrounding and central spaces. The main approach is observed from three sides, and directly from the Warden and staff office. The social space (café) also ensures an active building appearance within the site and contributes further to surveillance of this area. Additionally, of course, the 24 hour warden presence adds considerably to the security of the setting and residents perception of safety in their homes. The features referred to at Appendix H of the DAS, recommended specifically for sheltered housing schemes, will be incorporated into the development.

Access

- 7.115 The LPA's Access Officer has inspected the existing almshouse complex and provided feedback suggesting alterations that might be undertaken to improve access within the existing buildings. These comprise rudimentary works which would improve access to ground floor units to some degree but would not assist in accessing the first floor nor address the basic inadequacies of the bed-sit module design. As acknowledged by the Local Authority's Deputy Director of Social Care, Health and Housing, provision of fit-for-purpose accommodation for the elderly on this site requires a more fundamental redevelopment of the present complex.
- 7.116 It is demonstrated in the Access Statement prepared by Aperis that the proposed scheme meets best practice as set out in the LP; policies 3.5 and 3.8 MALP March 2016 and The LPA's HDAS.

Residential Amenity

- 7.117 Following earlier pre-application discussions with the LPA, areas of concern with regard to both the amenities of future occupiers of the development and the amenities of neighbours to the site have been given careful consideration and appropriate scheme revisions actioned. The LPA's feedback and subsequent scheme amendments are detailed in Section 6.0 of the DAS. In addition a number of pertinent points were raised during the public consultation event during at which scheme drawings and visuals were displayed. A summary of the views received, responses to them and actions taken is given at Section 7.0 of the DAS.
- 7.118 Considering first the level of amenity that will be offered to future occupiers, all units are, of course fully compliant with the Lifetime Homes standards, meet the LP's internal space standards and Part M requirements and the scheme aims to provide homes that elderly occupiers perceive as a 'place of retreat' (LP Policy 3.5 C).
- 7.119 Accordingly, the scheme features lift-accessed sheltered walkways (cloisters), at each level, ensuring a sense of security and protection at the entrance to each apartment. The internal layout features a generous, shared kitchen-living-diner main room and this space within each flat (other than bespoke unit Nos. 2 & 12) is dual-aspect, lit at both ends by glazed openings. The main aspect is provided by large, glazed double-width openings, the majority looking into the landscaped courtyard and each flat further benefits from its own small terrace (ground floor) or balcony (1st and 2nd floors) outside of these openings.
- 7.120 At the other end of the main living space the kitchen area benefits from a smaller glazed opening looking into the sheltered walkway. The walkway design features light-wells, windows and latticed brickwork panels, making them light and airy spaces and providing a secondary

light source for this main living space. These main spaces do, therefore enjoy a very pleasing courtyard aspect and good light penetration from both ends of the room, meeting the HDAS aim that all residential developments and amenity spaces should receive adequate daylight (para' 4.9). Each bedroom also has a glazed opening facing into the courtyard, except units 2 & 12 which face north.

- 7.121 In respect of the development impacts on neighbouring properties, regard must, of course, be had to the impacts from the present Woodbridge House. The design team has sought to ensure that the proposal does not impose itself to any greater extent or introduce effects on neighbours that would be perceived as markedly different from the present development. The LPA will note that the existing building complex features steeply pitched roofs, prominent two storey gabled wings extending out to north, east and western boundaries, and first floor windows looking out to the same boundaries.
- 7.122 The present Woodbridge House does, therefore, have a certain degree of prominence in views from surrounding properties, causes some overshadowing and results in some overlooking. Although the proposal introduces an additional floor, the building arrangement has sought to ensure that building elements, at their highest, are well separated from boundaries and surrounding properties. Objective analysis of the proposal's effects on neighbouring properties has been conducted through the comprehensive shadow analysis, daylight factor and vertical sky component studies set out in the DAS; Section 5.41.



Ex. prominent two storey gables facing the rear of properties in The Lynch, to the west of the site.



Two storey gables projecting towards eastern boundary and houses in Cross Road. The adjoining three storey flat development can be seen in the background, in yellow facing brick.

- 7.123 As confirmed by comparison of existing and proposed footprints (ex. shown dotted) on drawing No. 447/TP/001, the proposed footprint is largely maintained within the present extent set by the gabled wings. In respect of the relationship to properties in The Lynch a small increase in separation has been achieved, to the northern boundary, shared with the three storey flat development it remains about the same and to the eastern boundary separation is reduced at one point and increased at another. The net result is that building positions on the site are not seen to change appreciably.
- 7.124 The parts of the proposed building nearest the boundaries comprise the sheltered walkways which are lower than the gabled ends they replace and although maximum height is increased by reason of the 2nd floor, the ridge line of the main back to front span sits much further into the site, away from boundaries. For example, looking at the 'back to back' relationship with properties in The Lynch, the existing separation between the projecting gables at Woodbridge House and the rearmost parts of houses in The Lynch is around 14.0-14.6 metres. At first and second floor, the proposal increases this to between 17.0 and 17.6 metres from the outer face of the proposed walkways, 20.8 to 21.4 metres from the internal rear wall of the apartments and 25.0-26.0 metres from the north-south roof apex.
- 7.125 In view of the combination of; increased separations, the walkway design featuring a sloped mansard face and flat roof at 2nd floor level

and the main roof above sloping away from the boundary, It is not considered that the proposed building will be seen as any more dominant than the present building. The greater overall height is mitigated by the lower overall height of the sheltered walkways compared to the present gabled ends and main ridge position set well into the site. The same balance is also struck to northern and eastern boundaries.

7.126 The daylight etc studies I have summarised earlier in the report (see the DAS for full details) do provide an objective interrogation of the relationship of the existing and proposed with surrounding properties and do bear out that the proposed building would not reduce daylight/sunlight or increase overshadowing. Although neighbours may harbour a perception that the additional floor and overall height increase would be more overbearing and it will inevitably alter 'views' to some extent, I consider in light of the above it is reasonable to conclude that neighbour's outlook and amenities will be adequately preserved.

7.127 In respect of overlooking, as I mention earlier, the present building promotes a degree of overlooking from existing first floor windows serving kitchens and bedrooms. A feature of the proposed design is that the rear, outer, walls to habitable rooms (the kitchen areas in the majority of units) are partly internalised, within the sheltered walkways. The walkways themselves are, of course, not habitable spaces and their use is occasional and fleeting. Moreover the design of the walkways uses a combination of features; brick lattice panels, railings glazed openings (fitted with obscure glass in the elevation facing The Lynch) such that interest is articulated in the outer elevations but their occasional use by occupiers would not be readily apparent from neighbouring properties and unlikely, in practice, to be perceived as intrusive. Habitable windows are set at the back of the walkway and largely screened by the walkway features.

7.128 I conclude that the proposal has paid proper regard to mitigating harmful overlooking of neighbouring properties through considered design and layout. There is a degree of overlooking from the present buildings, via clear glazed first floor openings to habitable rooms and it is considered that the design of the proposed outer elevations successfully avoids the more direct overlooking relationships that exist at present. It is considered that the proposal complies with the objectives of the HDAS and would not result in unacceptable harm to the amenities of neighbouring occupiers.

7.129 *CILL & S106 / UU*

7.130 It is considered that for the applicant, UUWT, meets the conditions set out in Regulation 43 of the Community Infrastructure Levy Regulations and will be entitled to mandatory relief from CIL. Discretionary Relief under regulation 44 may also be applicable. The applicant is a

charitable institution and the chargeable development will be used wholly or mainly for charitable purposes. The 'open market' sheltered units comprise less than 50% of the development and in any event are provided as a means of funding the provision/renewal of charitable almshouse and in support of the Trust's other charitable work. As set out in the NPPG:

Under the mandatory charitable exemption, the chargeable development must be used 'wholly or mainly for charitable purposes' once it is completed. This is a similar formulation to that used for business rates charitable relief. There is no statutory definition of this requirement. However, the courts have held 'mainly' to mean 'more than half.' The chargeable development must be used to 'directly facilitate the carrying out of the charitable institution's charitable purposes' – or those of itself and other charitable institutions

7.131 CIL Form No. 1 has been completed and accompanies the application. The applicant will be advised to complete CIL Form No. 2 should planning permission be granted for the development and prior to commencement, as required.

7.132 During pre-application discussions with the LPA, officers drew attention to four Heads of Terms which may go on to be addressed in a S106 agreement/Unilateral Undertaking:

- Construction Training/Co-Ordinator Costs
- Air Quality Monitoring
- Project Management
- Affordable Housing

7.133 The matter of Affordable Housing, I have addressed above, at paras' 7.82-7.89. As I also note earlier at para' 7.102, the applicant is a registered charity and the development, should it be approved will partly rely on borrowings. Funds otherwise available to The Trust are all used for charitable purposes, whether that be as bequests to those in need, subsidising the almshouse WMC's and in staff and maintenance costs. Whilst information has not been supplied by the applicant at this point to suggest that a requirement for contributions would render the scheme unviable, the LPA are asked to consider that monies that are available to The Trust and not requested as contributions by the LPA are in any event spent within the Borough on those in need.

7.134 A draft S106 or UU is not tabled at this time. In light of the above, should the LPA maintain contributions are necessary, a draft agreement can be tabled to the LPA when these matters are identified during the application and consultation process.

8.0 Conclusion

- 8.1 The foregoing comprises a comprehensive appraisal of the development in the light of London and Borough planning policies and guidance. It finds the scheme to encompass significant public benefits and to raise no substantive areas of policy conflict. It acknowledges some harm to heritage assets but, in light of the pressing need for the development; to house a growing elderly population in the Borough and London-wide and maintain and enhance the almshouse institution and its contribution to the social fabric of the Town, finds that harm to be clearly outweighed.
- 8.2 We trust the LPA will agree that this proposal will provide a well designed, inclusive and sustainable development for the site. The development will allow The Trust to fulfil its obligation to provide high quality housing to those in the Uxbridge area in need. The proposal seeks to make best use of a central, accessible site whilst taking care not to compromise neighbour amenities. We trust the LPA will see this proposal as a potential enhancement of the Conservation Area, complementing local distinctiveness and preserving the quiet setting and almshouse use that contribute to the site's character and the wider RBCA.