



224-231 High Street, Uxbridge, UB8 1LD

Planning Statement

September 2021

Contents

1. Introduction 1

2. Site Description 2

3. Planning Application Specification.....7

4. Planning Policy Framework 9

5. Planning Assessment.....14

6. Planning Obligations.....31

7. Summary and Conditions 32

Prepared By:

Tim Sturgess
Director

Freddie Clarke
Planner

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This Planning Statement has been prepared by Avison Young and is submitted in support of a full planning application ('the Application'), for alterations to the existing building and single storey extension to 224-231 High Street, Uxbridge, UB8 1LD ('the site') to provide 8 residential units (Use Class C3). The Application is submitted on behalf of Chesterhouse Properties (Uxbridge) Ltd ('the Applicant').
- 1.2 This Application seeks full planning permission for the following proposed development:

'Full planning permission for alterations to the existing building and single storey extension to provide 8 residential units (Use Class C3), and associated works.'

Statement Structure

- 1.3 This Statement sets out the planning rationale that underpins the proposed development and demonstrates its acceptability in planning terms.
- 1.4 This Statement is structured as follows:
- **Section 2** provides an overview of the site and surrounding context;
 - **Section 3** sets out the specification of the planning application and the proposed development;
 - **Section 4** outlines the planning policy framework relevant to the determination of the application;
 - **Section 5** assesses the application against relevant planning policy and guidance;
 - **Section 6** sets out the draft heads of terms for planning obligations; and
 - **Section 7** summarises the planning case for the proposed development.

2. Site Description

Site Location

- 2.1 The site is located within the south east of Uxbridge town centre within the administration boundary of the London Borough of Hillingdon (LBH) (the Local Planning Authority (LPA)). The site is located on Uxbridge High Street, approximately 300m to the south east of Uxbridge Underground Station.

Site Description

- 2.2 The site is c. 0.14ha and consists of a three-storey building comprising Class E floorspace at ground floor, including shops, financial and professional services and restaurants, and two storeys of residential (Class C3) use above. The ground floor uses include Subway, funeral directors, a convenience store, dry cleaners, a Chinese restaurant and a Games Workshop/Warhammer shop. The site is served by 13 car parking spaces to the rear.
- 2.3 The site is bound by the Grade II* listed Discotheque Royle in use as a gym to the north; by High Street to the south; by 232 High Street to the east; and by an access road to the west.

Surrounding Context

- 2.4 The site is located within the south east end of Uxbridge Town Centre. The Hillingdon Civic Centre is located directly to the south of the site, beyond High Street; the Slug and Lettuce bar is located within the Grade II listed 220-221 High Street to the west; and to the east beyond 232 High Street is Escape Pool Bar and Atik night club.
- 2.5 The Town Centre is characterised by a range of uses services and facilities, including retail/leisure uses within the Chimes Shopping Centre, which includes a large 4-storey car park to the north, commercial/office uses, including the 7-storey The Charter Building to the west, and residential uses. The predominant land use surrounding the town centre to the south and south east is residential, including a mix of 2-storey terraced and semi-detached dwellings and flats.

Accessibility

- 2.6 The site benefits from existing pedestrian access via High Street and vehicle access from an access road off High Street which provides good access to the B483 and A40 to the north and M25 to the west. The site is served by 13 car parking spaces to the rear.

- 2.7 The site has very good access to the existing public transport network (PTAL 5). Uxbridge Underground Station is located approximately 300m walking distance to the north west, which is served by the Metropolitan and Piccadilly lines providing good connections into the centre of London. The site is within 50m of the Civic Centre bus stop (Stop U) which is served by bus services 427, U1, U3, U4, U7 and night bus N207, connecting the site to the wider surrounding area including Ruislip.

Planning History & Existing Lawful Use

Site Planning History

- 2.8 The Council's online planning records include the planning history for the site, which include those identified within Table 2.1 below:

Table 2.1: Site Planning History

Address	Reference	Description	Decision/Date
1st And 2nd Floor 225 High Street Uxbridge UB8 1LD	42917/APP/2014/2082	Convert upper floor office above ground floor shop to 2 self-contained apartments	Prior Approval Not Required 18 August 2014
224-232 High Street Uxbridge	42917/APP/2005/3304	Change of use of part first and second floors (Nos.225A/B, 227A/B, 228A/B and 229B) from general office (Class B1(a)) to residential (Class C3) and change of use of ground floor shop (no.231) from retail (Class A1) to restaurant (Class A3)	Approved 11 November 2008
224 High Street Uxbridge	8520/APP/2006/1371	Erection of a single storey rear extension and installation of air conditioning condensers and extract flue.	Approved 30 June 2006
231-232 High Street Uxbridge	42917/APP/2005/3545	Erection of single storey rear extensions to both buildings	Approved 08 June 2006

224-232 High Street Uxbridge	42917/APP/2005/3378	Alteration to shop frontage including relocation of entrances to upper floor, to rear of building	Approved 23 May 2006
224 High Street Uxbridge	8520/APP/2003/272	Change of use from amusement centre to retail	Approved 01 April 2003

Existing Lawful Use

2.9 The existing lawful use of the site is Class E at ground floor and Class C3 at first and second floors.

Recent and Emerging Context

2.10 The following planning applications set out within Table 2.2 below are relevant to understand the emerging context of the surrounding area. These applications demonstrate that there is an emerging context of residential development and in the form of redevelopment and extensions to existing buildings within and surrounding the town centre.

Table 2.2: Planning History Context

Address	Reference	Description	Decision/Date
Land East of Mons Barrack Block, St Andrew's Park Hillingdon Road Uxbridge UB10 0RX	585/APP/2017/2819	Outline planning application with means of site access from the central access road for the erection of up to 90 dwellings (Use Class C3), sustainable urban drainage features and all other necessary ancillary and enabling works. The proposals include buildings up to 6 storeys outside of the town centre to the east.	Approved 01 August 2018
Randalls 7-9 Vine Street Uxbridge	41309/APP/2016/3391	Change of use of the ground and part first floor of the Randalls building from Use Class A1 to Use Class A3 (flexible use within Use Class A1/A3 for the island display cabinet), conversion of part of the first floor from Use Class A1 to Use	Approved 29 March 2017

		Class C3 (residential); addition of a second storey roof top extension to provide residential apartments (Use Class C3) and external restoration works; the erection of three new residential blocks (Use Class C3) ranging from 3 to 6 storeys in height, a new ground floor commercial unit (Use Class A1/A2/A3), conversion of the Old Fire Station Building to duplex apartments (Use Class C3); the provision of associated landscaping, car parking and associated works, to provided 58 residential units in total and 750 sqm of commercial floorspace, involving the demolition of the 1960's extension to the Randalls building, caretakers flat and warehouse buildings	
Securitas House (Formerly Lovell House) High Street Uxbridge UB8 1LQ	32215/APP/2016/4037	Change of use of existing office building (B1(a) Use Class) to 31 self-contained apartments (Class C3).	Approved 28 December 2016
St Andrews Park Hillingdon Road Uxbridge	585/APP/2015/2657	Erection of 249 dwellings comprising 3no studio apartments, 92no. 1bed apartments, 130no. 2 bed apartments, 24no. 3 bed apartments together with associated parking and landscaping, and all details required by Conditions 2 and 3 relating to the reserved matters of	Approved 17 September 2015

		layout, scale, appearance and landscaping.	
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3. Planning Application Specification

- 3.1 The purpose of this section is to describe the proposed development for which planning permission is sought and to set out the specification of the planning application.

Description of Development

- 3.2 Planning permission is sought for:

'Full planning permission for alterations to the existing building and single storey extension to provide 8 residential units (Use Class C3), and associated works.'

- 3.3 In summary, the proposed development comprises:

- The provision of 8 x 2-bedroom residential (Class C3) units;
- Dedicated private amenity space exceeding the London Plan standard for each unit;
- All units are dual aspect and have been designed in accordance with Part M4(2);
- Car free development in accordance with the London Plan standard; and
- 16 secure long-stay cycle parking spaces and 2 short stay spaces in accordance with London Plan standards.

Type/Form of Application

- 3.4 The application is submitted in detail (full planning permission).

Planning Application Package

- 3.5 The planning application package comprises the relevant forms and certificates and fee, alongside plans/documents for approval and other supporting information as required by the validation checklist, explained below.
- 3.6 The purpose of this documentation is to assist in the understanding/evaluation of the plans/details submitted for approval and to establish commitments to control implementation (where appropriate).
- 3.7 The following documents are submitted for approval:

- **Site Location Plan:** Identifying the extent of the application site (within which development is proposed).
- **Proposed Plans and Elevations:** Setting out in full how the scheme will be development including details on matters of layout, scale and appearance of the buildings, landscaping and access arrangements.

3.8 In addition to the above, the following are submitted to provide information to assist LBH in the determination of the application. These include:

- **Design and Access Statement:** This explains the design evolution of the proposed development. It explains how the amount, scale, layout, appearance and inclusive design issues have been developed. This also contains the accommodation schedule.
- **Planning Statement:** Which sets out how the proposed development conforms with all levels of planning policy.
- **Drainage Statement:** This report provides details of the proposed water drainage strategy and how it complies with planning policy.
- **Heritage Statement:** Which demonstrates consideration and how the development is acceptable in design terms in the context of the neighbouring Conservation Area and heritage assets.

3.9 The above application package is in full accordance with published national and local validation requirements and has been agreed with London borough of Hillingdon officers in advance of submission.

4. Planning Policy Framework

National Planning Policy Framework (2021)

- 4.1 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. It sets out the government's overarching planning policies for England and how they are to be applied. The core message of the NPPF is a 'presumption in favour of sustainable development'.
- 4.2 The following principal paragraphs of the NPPF are of particular relevance:
- **Paragraph 11** establishes the 'presumption in favour of sustainable development', which for decision taking this means approving development proposals that accord with the development plan without delay.
 - **Paragraph 60** supports the Government's objective of significantly boosting the supply of homes, noting it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
 - **Paragraph 86** sets out planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
 - **Paragraph 119** states planning policies and decisions should promote an effective use of land in meeting the need of homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.
 - **Paragraph 120** states policies and decisions should support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed, and can maintain safe access and egress for occupiers.

The Development Plan

- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act (2004) outlines that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Accordingly, national planning policy and the development plan are the starting point for establishing the planning position of the site.
- 4.4 The Development Plan comprises the following:
- London Plan (2021);
 - London Borough of Hillingdon's Local Plan Part 1 (2012) (LPP1); and
 - London Borough of Hillingdon's Local Plan Part (2020) (LPP2) comprising:
 - Development Management Policies;
 - Site Allocations and Designations;
 - Policies Map.
- 4.5 Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the Borough.

Supplementary Planning Guidance/Documents

- 4.6 The Council has prepared a suite of Supplementary Planning Guidance Document (SPG) and Supplementary Planning Documents (SPD) including the following which are of relevance to the scheme:
- Accessible Hillingdon SPD (2017); and
 - Planning Obligations SPD (2014).

Strategic Planning Policy and Guidance

- 4.7 The London Plan provides the strategic policy for London, tailored to meet London's planning priorities and forms part of the Development Plan for the site. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.
- 4.8 The GLA has published a range of Supplementary Planning Guidance (SPG). The SPGs of particular relevance to this application includes:

- Housing (2016);
- Town Centres (2014).

Site Specific Policy Designations

4.9 The site is subject to the following relevant designations as identified on the adopted LPP2 Policies Map 2020:

- Uxbridge Town Centre (which is categorised as a Metropolitan Centre in the London Plan – the second highest tier in the hierarchy of centres);
- Air Quality Management Area.

4.10 Whilst the site is located within the town centre boundary, it is not within the designated primary or secondary shopping areas.

4.11 The site is located within Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) of 5.

4.12 There are no listed buildings on the site nor is it located within a conservation area.

4.13 The site is adjacent to the Old Uxbridge/Windsor Street Conservation Area to the south east. In addition, there are five listed buildings within the vicinity to the site, including:

- Discotheque Royal (Grade II*), located approximately 20m to the north and east of the site;
- The Shrubbery (Grade II), located approximately 65m to the north of the site;
- Hillingdon Civic Centre (Grade II), located approximately 30m to the south of the site;
- Nos 220 and 221 High Street (Norman Reeves Motors) (Grade II), located approximately 50m to the west of the site; and
- Church of St Andrew (Grade II), located approximately 180m to the south east of the site.

Relevant Development Plan Policies

4.14 The following Development Plan policies are of relevance:

- **London Plan Policy GG2 (Making the Best Use of Land)** requires councils to proactively explore the potential to intensify the use of land to support additional homes, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach. The policy encourages development of brownfield land on sites within and on the edge of town centres.

- **London Plan Policy SD6 (Town Centres and High Streets)** sets out that the potential for new housing within and on the edge of town centres should be realised through mixed-use or residential development that makes better use of land and capitalises on the availability of services within walking and cycling distance, and the current and future accessibility by public transport.
- **London Plan Policy H1 (Increasing Housing Supply)** sets the ten-year targets for net housing completions within Local Planning Authorities. For Hillingdon, the ten-year housing target is 10,830.
- **LPP1 Policy BE1 (Built Environment)** requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. All new development should achieve a high quality of design, be appropriate to the identity and context of buildings, landscapes and views, and make a positive contribution to the local area, include 'Lifetime Homes' principles, maximise opportunities for new homes to contribute to tackling and adapting to climate change and not adversely affect their surroundings. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.
- **LPP1 Policy HE1 (Heritage)** seeks to conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes designated heritage assets such as statutorily listed buildings and Conservation Areas.
- **LPP2 Policy DMHB11 (Design of New Development)** requires new buildings to be designed to the highest standards and incorporate principles of good design. Proposals should harmonise with local context by taking its surroundings into account, ensure the use of high-quality materials and finishes and provide landscaping and tree planting. Proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space, and not limit re-development potential of adjoining sites.
- **LPP2 Policy DMHB1 (Heritage Assets)** sets out that proposals will be supported where it will not lead to a loss of significance or harm to an asset.
- **LPP2 Policy DMHB2 (Listed Buildings)** requires applications to include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.
- **LPP2 Policy DMHB4 (Conservation Areas)** states that new development within a Conservation Area or on its fringes will be expected to preserve or enhance the character or appearance of the area. Proposals are required to be of a high-quality contextual design.

Other Material Considerations

General Permitted Development Order (GPDO)

- 4.15 In August 2020, new permitted development rights came into effect which allows for the extension of certain types of existing buildings through the addition of 1-2 storeys, subject to limits and conditions. This change was part of an initiative to revitalise town centres and remove planning obstacles.
- 4.16 However, the limits and conditions mean that PD rights do not apply if the existing building was constructed prior to 1st July 1948.
- 4.17 Although PD rights does not apply to the site in this instance, as the existing building is pre-1948, the changes to PD rights to allow upwards extensions is a material consideration in the context of delivering new homes and it is a clear indication of the increasingly need to make innovative use of previously developed land to meet the need for additional housing.

5. Planning Assessment

5.1 This section assesses the following key planning considerations relating to the proposed development:

- Principle of Sustainable Development;
- Proposed Residential Use;
- Residential Quality (Mix, Amenity, Accessibility);
- Design (Scale/Height, Layout, Appearance, Consideration of Neighbouring Future Development);
- Heritage; and
- Environmental and Technical Considerations.

Principle of Sustainable Development

Policy

5.2 At the heart of the NPPF is a 'presumption in favour of sustainable development' which requires LPAs to approve planning applications which accord with the development plan without delay (para 11). Where the development plan is absent, silent or out-of-date, the default position is for permission to be granted, unless any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

5.3 Paragraph 119 states planning policies and decisions should promote an effective use of land in meeting the need of homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

5.4 London Plan Policy D3 states that all development must make the best use of land by following a designed approach that optimises the capacity of sites.

5.5 LPP1 policy NPPF1 reiterates the sustainability principles set out in the NPPF, confirming that proposals must be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. LPP1 Policy H1 also notes the potential for high quality mixed used developments to meet housing demand will require the efficient use of land.

Assessment

- 5.6 The proposed development accords with the core land use principles of making efficient use of brownfield land to assist in the delivery of new and much needed homes in an area that is highly sustainable.
- 5.7 The site comprises previously developed (brownfield) land and makes sustainable use of the site through the retention of the existing uses and extending the existing building to create new homes, in an accessible location within Uxbridge Town Centre. All policies at national, regional and local level support the sustainable intensification and optimisation of such sites in principle. Therefore, the principle of development is acceptable.

Proposed Residential Use

Policy

- 5.8 NPPF Paragraph 60 supports the Government's objective of 'significantly boosting' the supply of homes by ensuring a sufficient amount and variety of land can come forward where it is needed. Paragraph 119 requires policies and decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.
- 5.9 Paragraph 120 states policies and decisions should support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed, and can maintain safe access and egress for occupiers.
- 5.10 London Plan Policy H1 seeks to optimise the potential for housing delivery on all suitable and available brownfield sites, particularly within areas of good access to public transport. Similarly, Policy SD6 states that the potential for new housing within and on the edges of town centres should be realised through residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. The Policy sets a ten-year targets for net housing completions for Local Planning Authorities. For Hillingdon, the ten-year housing target is 10,830.

- 5.11 London Plan Policy H2 encourages boroughs to pre-actively support well designed new homes on small sites through planning decisions to significantly increase the contribution of small sites to meeting London's housing needs. It sets minimum targets for small sites, of below 0.25ha. Hillingdon has a target of 2,950 for net housing completions over a 10-year period (2019/20-2028/29).
- 5.12 Policy H2 expects housing provision to include a range of housing to meet the needs of all types of households. Affordable housing is only required on sites with a capacity of 10 or more units.

Assessment

- 5.13 Planning policy at all levels places great importance on the need for new homes that are of high-quality design and highlights the role that this can play in creating successful communities. The proposed development seeks to optimise the use of the existing low-density three storey building. The NPPF advises that local authorities should avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. It also outlines that planning policies and decisions should ensure developments are sympathetic to local character while not preventing or discouraging appropriate innovation or change.
- 5.14 Paragraph 120 seeks to support opportunities to use the airspace above existing residential and commercial premises for new homes. On top of this, there is a clear drive to encourage building upwards, by adding a limited number of storeys to existing buildings, evidenced through the recent amendments to the General Permitted Development Order to allow one or two storey extension to certain buildings. Whilst this site is not eligible for permitted development rights due to the date the original building was constructed, this sets a clear overarching national policy aim to optimise mixed use sites for additional housing.
- 5.15 LPP2 Policy DMH7 requires sites capable of providing 10 or more units to contribute to affordable housing. This site has been optimised to deliver the maximum number of units which is clearly below this threshold. This position is reiterated by NPPF paragraph 64 which clearly states that the provision of affordable housing should not be sought for residential developments that are not major development. As the proposals provide under 10 residential units, affordable housing is not required at any level of policy.
- 5.16 Therefore, the proposals comply with all levels of policy and assist with boosting the supply of homes through the optimisation of a suitable, sustainable, underutilised brownfield site. The units will assist the Council with delivering its housing targets, whilst respecting the prevailing height and form of neighbouring properties. The principle of residential development is therefore acceptable within this location and should be supported without delay.

Residential Quality

- 5.17 The NPPF sets out how the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve (para. 126).

Mix

Policy

- 5.18 The NPPF requires LPAs to deliver a wide choice of high-quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand (Para 62).
- 5.19 London Plan Policy H10 states that Londoners should have a genuine choice of homes that they can afford, and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New developments are required to offer a range of housing choices in terms of mix of housing sizes and types. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.
- 5.20 LPP1 Policy H2 requires all housing developments to include a range of housing. LPP2 Policy DMH2 states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.
- 5.21 There is a need for family housing in LBH, which is identified in the HMNA (2016) and highlighted in the LPP1, which states that in terms of residential development the type of dwellings provided should reflect housing needs identified in the borough, particularly the need to provide more family homes.

Assessment

- 5.22 The proposals include the provision of 7 x 2b3p and 1 x 2b4p units.
- 5.23 This provision has been established through an analysis of the existing site and the intention to use the existing stairwells for access. Therefore, the existing party walls on the floor below have been used to split the apartments. The proposals have also been designed with the aim of optimising the housing potential on the site, whilst complying with minimum space and amenity standards and creating high-quality dwellings.

- 5.24 The unit mix has also been established through an analysis of the site's location within a town centre. As set out within London Plan Policy H10, two bed units are generally more appropriate within town centre locations and areas with high public transport accessibility. Therefore, the provision of 8 two bed units is appropriate and in accordance with the relevant planning policy.

Amenity

Policy

- 5.25 The Mayor's Housing Guide SPD and London Plan Policy D6 require a minimum of 5sqm of private outdoor space for all 1-2 person dwellings and an extra 1sqm for each additional occupant. The minimum width and depth for all balconies and other private external spaces is 1500mm, and private outdoor spaces should have level access from the home to meet Lifetime Homes standards.
- 5.26 LPP2 Policy DMHB18 requires all new residential development to provide good quality and usable outdoor amenity space. Amenity space should be in accordance with the standards set out in Table 5.3. For 2-bedroom flats, the minimum amenity space provision should be 25sqm. Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

Assessment

- 5.27 All of the proposed units will have access to good quality, usable, outdoor amenity space, in the form of a terrace, in line with London Plan requirements. All terraces comply with the minimum width and depth of 1500mm. The 2 bed 4-person unit will be provided with 10.9sqm of terrace space. All of the 2 bed 3-person units will be provided with between 8.2sqm and 10.3sqm of terrace space. The existing parapet will be raised to match the level of the neighbouring 233 High Street and will form the boundary of the outdoor amenity space. It will be constructed out of matching/complementary brick to ensure that it is in keeping with the character of the area to ensure harmonisation with the existing street scene. The divisions between terraces will be kept at 1100mm to match the height of the raised parapet.
- 5.28 Therefore, the proposals comply with the minimum required outdoor amenity space standards and provide good quality, usable space, with a front façade that is in keeping with the character of the area, in line with planning policy.

Accessibility

Policy

- 5.29 Paragraph 92 of the NPPF sets out that decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.
- 5.30 London Plan Policy D5 states development proposals should achieve the highest standards of accessible and inclusive design. They should be designed taking into account London's diverse population and be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment.
- 5.31 London Plan Policy D7 states that residential development must ensure that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 5.32 LPP2 Policy DMHB16 details that all housing developments should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this, all development should meet or exceed the most up to date internal space standards and major developments should provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.
- 5.33 The Accessible Hillingdon SPD sets out that Hillingdon Council have adopted the Housing – Optional Technical Standards where 90% of new dwellings should meet M4(2) for an accessible and adaptable home and 10% should meet requirements of an M4(3) wheelchair adaptable or accessible dwelling.

Assessment

- 5.34 All units have been designed in accordance with Building Regulation requirement M4(2) 'accessible and adaptable dwellings' to allow comfortable living for disabled people, older people and families with young children. However, there is no step free access from street level to the private entrance door of the units and it is therefore not possible to provide an M4(3) unit.
- 5.35 Due to the nature of the existing building, it is not possible to provide a lift for any of the circulation cores. As set out within the Design and Access Statement, the design team have explored incorporating a lift within 224 High Street and what impact this would have upon the existing accommodation. To accommodate the lift, a large amount of commercial space would have to be sacrificed, which would be to the detriment of the commercial space and is also not feasible due to the current lease arrangements. The existing residential units above would also have to be re-planned, causing a large amount of disruption to current occupiers. The length of the stair from 2nd to 3rd floor is also too long to allow space for a turning circle of 1500mm out of the lift. Therefore, it has been deemed that

incorporating a lift into the existing building is not feasible but that the proposed access arrangements maximises the amount of new residential accommodation.

- 5.36 As all units have been designed to meet M4(2) and it has been demonstrated that step free access cannot be provided due to the constraints of the existing building. As a minor development, this is acceptable on balance given the planning benefits of delivering an additional 8 units.

Design

Policy

- 5.37 The NPPF states that 'the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve' (para. 126).
- 5.38 The NPPF also emphasises how 'great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings' (paras 134).
- 5.39 London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites. Incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. Proposals should:

Form and Layout

1. enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions;
2. encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area;
3. be street-based with clearly defined public and private environments;
4. facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users;

Experience

5. achieve safe, secure and inclusive environments;
6. provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest;
7. deliver appropriate outlook, privacy and amenity;

8. provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity;
9. help prevent or mitigate the impacts of noise and poor air quality;
10. achieve indoor and outdoor environments that are comfortable and inviting for people to use;

Quality and Character

11. respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character;
12. be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
13. aim for high sustainability standards;
14. provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

5.40 London Plan Policy D6 sets out that housing development should be of high-quality design and provide adequately sized rooms with comfortable and functional layouts. Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.

5.41 LPP1 Policy BE1 further reflects the NPPF and London Plan objectives. It states that the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. New development must achieve a high quality of design and should be designed to be appropriate to the identity.

5.42 LPP2 Policy DMHB11 requires new buildings to be designed to the highest standards and incorporate principles of good design. Proposals should harmonise with local context by taking its surroundings into account, ensure the use of high-quality materials and finishes and provide landscaping and tree planting. Proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space, and not limit re-development potential of adjoining sites.

Scale/Height

5.43 The Design and Access Statement, prepared by Ibbotson Architects, sets out the concept and design of the proposals. The proposed development seeks to respond to an opportunity to optimise a sustainable brownfield site within an accessible, town centre location. The design has successfully been developed through a design-led process to unlock the potential for a one storey upwards extension

which will result in the provision of 8 high quality residential units which sensitively respects and further enhances the existing townscape by promoting high quality development in line with adopted policy.

- 5.44 The existing parapet will be raised to the same height of the neighbouring cinema, in brick to match the existing parapet to the front and render to the rear. This will level the building at both the front and rear to allow a new mass to sit upon the existing building. The new parapet will be set back 60mm from the front elevation to highlight the existing parapet and pediment. The rear elevation will be rationalised to provide a straight parapet, with the new parapet matching the existing render.
- 5.45 The extension will be pushed back from the front elevation which will create a positive visual impact in the context of the existing building fronting the High Street. This, coupled with the raised parapet, will hide a large proportion of the additional mass, creating additional units with a positive impact in design terms on the existing street scene, character and setting of the area.

Layout

- 5.46 The design team have worked hard to ensure that the impact on the existing occupiers is minimised as far as possible. The existing stairwells and circulation cores will be used and extended to allow access to the proposed third floor units. The existing second floor party walls will be used as a guide to split the units to regulate fenestration locations, allow dual aspect units and to ensure that all units benefit from outdoor amenity space.
- 5.47 The front façade of the extension has been pushed back from the existing façade to minimise the impact on the primary elevation and to create usable outdoor amenity space for the units. Divisions between the terraces has been kept to 1100mm so as not to exceed the height of the raised parapet.

Appearance

- 5.48 The raised parapet will be brick to the front elevation to match the existing parapet, and render to the rear to match the existing render. It will be set back to highlight the existing parapet and pediment. Pushing the volume of the extension back from the front façade allows the existing elevation to be read ahead of the extension, as well as providing outdoor amenity space.
- 5.49 The change in materials from existing masonry to the lightweight profiled aluminium cladding of the extension differentiates the new from the existing and creates an architecturally subservient floor. Each unit will have openable glazed panels to allow access to the private outdoor amenity space.

- 5.50 The design team have explored fenestration options to optimise operational and appearance consideration. The favoured and most appropriate fenestration design is to line up the middle-glazed terrace panel of the new units with the middle window of the existing residential units below. This allows for fewer verticals for a cleaner façade and increases privacy to neighbouring amenity by using a narrower expanse of glazing. The rear elevation will also be de-cluttered by re-routing existing downpipes. This will aid with reading the rhythm of the new fenestration in line with the existing.

Consideration of Neighbouring Future Development

- 5.51 The current proposals do not include an extension to 232 High Street. This property will not be extended as part of this Application as it does not fall within the Applicant's ownership. However, as set out within the Design and Access Statement, the proposals do not preclude a future extension at this location, and an extension to match the proposals could be constructed at a later date. The owner of 232 High Street has expressed an interest in adding a complementary extension in the future, using the same architectural treatment and the design has been carefully scrutinized to ensure this will be possible.
- 5.52 The proposed scheme has demonstrated high quality design and provides a subtle solution to fully optimise the sustainable brownfield site within the town centre. It therefore complies with adopted policies in terms of design.

Heritage

Policy

- 5.53 The NPPF sets out that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, the positive contribution that conservation of heritage assets can make and the desirability of new developments making a positive contribution to local character and distinctiveness (para. 194).
- 5.54 London Plan Policy HC1 sets out that proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Proposals should also identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

- 5.55 LPP1 Policy HE1 seeks to conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes designated heritage assets such as statutorily listed buildings and Conservation Areas. LPP2 Policy DMHB1 sets out that the Council will expect proposals to avoid harm to the historic environment and will only be supported where it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss.
- 5.56 LPP2 Policy DMHB2 states that permission will not be granted for granted for proposals which are considered detrimental to the setting of a listed building. Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance. LPP2 Policy DMHB3 details that proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.
- 5.57 LPP2 Policy DMHB4 states that new development within a Conservation Area or on its fringes will be expected to preserve or enhance the character or appearance of the area. Proposals are required to be of a high-quality contextual design. The loss of historic street patterns and views will be resisted that make a positive contribution to the character or appearance of the Conservation Area and any such loss will need to be supported with a robust justification.

Assessment

- 5.58 A Heritage Statement, prepared by HCUK Group, accompanies this planning application.
- 5.59 As set out within the Heritage Statement, the site is located in close proximity to the boundary of the Old Uxbridge/ Windsor Street Conservation Area as well as within the settings of a number of listed and locally listed buildings, all of which have been fully assessed in accordance with the guidance set out in GPA3.
- 5.60 The heritage assets identified all share a setting which is characterised by a wide variety of buildings dating from the 17th through to the later 20th century. While it has been noted that this variety of architectural styles and materials adds to the visual interest of the local streetscape, it does not directly contribute to the significance of the individual heritage assets. Moreover, the application site, which forms part of this setting, has been found to make no direct contribution to the significance of any of the heritage assets.
- 5.61 While the proposals present a visible change to an existing building within the local streetscape, this is entirely consistent with the varied character of the area and the existing settings of the assets and will

not consequentially cause any level of harm to the significance of the designated and non-designated heritage assets which have been identified.

- 5.62 Therefore, the Heritage Statement concludes that the proposals are proportionate and compliant with the relevant policies and are acceptable in heritage terms.

Environmental and Technical Considerations

Transport

Policy

- 5.63 At all levels within planning policy there is a strong presumption in favour of reducing the need to travel, particularly by private car, and encouraging more sustainable modes of transport.
- 5.64 The NPPF encourages design solutions which support reductions in greenhouse gas emissions and reduce congestion (para. 105). It also recognises that where development may generate a significant amount of movement it should be supported by a Transport Assessment and Travel Plan (paras. 113).
- 5.65 London Plan Policy T5 requires the provision of appropriate levels of cycle parking, at least in accordance with the minimum standards. For long-stay parking, 2 spaces per dwelling should be provided for dwellings of over 1 bedroom. 2 short-stay spaces should be provided for 5-40 dwellings.
- 5.66 London Plan Policy T6 states that car-free development should be the starting point for all development proposals in places that are well-connected by public transport. Adequate provision should be made for efficient deliveries and servicing and emergency access. Policy T6.1 states that new residential development should not exceed the maximum parking standards. The maximum parking provision for areas in PTAL 5 is car-free.
- 5.67 LPP2 Policy DMT1 requires proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. Developments are required to be accessible by public transport, walking and cycling, maximise safe, convenient and inclusive accessibility, provide equal access for all people, address delivery, servicing and drop off requirements and have no significant impacts or associated air quality and noise impacts on the local and wider environment.
- 5.68 LPP2 Policy DMT2 sets out that proposals must ensure safe and efficient vehicle access to the highway network, they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users, safe, impacts on local amenity and congestion are minimised by routing through traffic by the most direct means and there are suitable mitigation measures to address any traffic impacts in

terms of capacity and functions of existing and committed roads. Policy DMT5 requires the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1. For flats, the minimum standards are 1 cycle parking space per 2 bed unit.

- 5.69 LPP2 Policy DMT6 sets out the car parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. For flats, this includes 1-1.5 spaces per unit for 1-2 bedrooms, alongside visitor parking.

Assessment

- 5.70 The existing site benefits from 13 existing car parking spaces to the rear of the building which currently serve the existing commercial and residential units. This is substantially above the current policy direction for car free development in this town centre location.
- 5.71 The proposed units will be car free, in accordance with the London Plan. In addition, two of the existing car parking spaces will be removed to enable the provision of cycle parking spaces for the new units. Therefore, sustainable and active modes of transport are encouraged within this highly accessible, town centre location. This fully aligns with policy which encourages car free development.
- 5.72 An enclosed cycle storage unit is proposed in place of two of the existing car parking spaces to the rear of the building. This enclosure will provide 16 secure cycle parking spaces, in line with London Plan standards. At this stage, it is proposed that the exact location and specification of this enclosure is secured by way of planning condition. In addition to this, 2 short-stay spaces will be provided in the form of a Sheffield bike stand, located to the side elevation of 224 High Street. These short-stay spaces are visible from High Street to minimise the risk of damage or theft.
- 5.73 Delivery and servicing, including refuse, will continue to be carried out as existing. All units will have dedicated built-in storage for refuse and refuse will be taken out on the evening before collection.
- 5.74 Therefore, the proposals are acceptable in transport terms and comply with the London Plan car and cycle parking standards, and national and local policy.

Drainage

Policy

- 5.75 The NPPF requires a Flood Risk Assessment (FRA) to be submitted with planning applications for all development sites over one hectare in area and development sites of any size within Flood Zones 2 and

3. The FRA should determine the risks of flooding at the site from all sources including rivers, the sea, sewers and groundwater.

- 5.76 London Plan Policy SI13 sets out that proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should be a preference for green over grey features and developments should follow the drainage hierarchy.
- 5.77 LPP1 Policy EM1 requires development to be located and designed in a way that minimises the probability and impacts of flooding. Similarly, LPP1 Policy EM6 states that development will be directed towards sites in Flood Zone 1. The Council will also require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable.

Assessment

- 5.78 The site is within Flood Zone 1. Notwithstanding this, a Flood Risk Assessment and Drainage Strategy has been prepared by Eb7 and is submitted in support of this application.
- 5.79 Rainwater harvesting water butts should be provided on terraces to provide for water reuse for watering planters and facilitate external cleaning. Rainwater runoff flows from the various roof levels and existing external surfaces will drain as it currently does. Surface water from the site is to be connected to the Thames Water surface water sewer. Located at the front of the site within High Street.
- 5.80 Data from the EA's flood maps corresponds with that included within the Preliminary Flood Risk Assessment maps for the London Borough of Hillingdon and West London Strategic Flood Risk Assessment maps. The Preliminary Flood Risk Assessment maps for the London Borough of Hillingdon do not show any historical flooding at or close to the development site. The assessment concludes that the application site is at a very low risk of surface water flooding.
- 5.81 The SuDS strategy will be delivered in accordance with prevailing local and national planning policy and design standards. The existing site is a brownfield hard surfaced site that sits directly on London Clay and the site is not suitable for infiltration soakaway systems. There are no drainage ditches or watercourses on or near the site to drain to. The surface water from the existing site is drained via a Thames Water surface water sewer network located within the High Street.
- 5.82 A review of the EA flood maps, British Geological Society and London Borough of Hillingdon documents have identified that the site is not suitable for infiltration. There are no historical records of flooding at the application site. The site is at a very low risk of flooding and there are no mitigation measure requirements for the development. The main flood risk to the development is therefore from surface

water runoff from the new development itself. Surface water runoff exceedance flows from the existing application site onto the High Street and flows away from the site.

- 5.83 In addition to ensuring flood risk on site is not increased the SuDS design for the proposed redevelopment considers mitigation in order not to add to offsite flood risk. The proposed development is for a single storey, additional floor, vertical extension directly above part of the existing building. There will therefore be no change in the built footprint and impermeable surfaces as a result of the proposed development. The rate of surface water runoff from the proposed development will be the same as the existing rate.
- 5.84 Given the proposed development is for a vertical extension, there is limited scope to implement large scale SuDS on site. It is recommended that the proposed extension discharges surface water runoff via the drainage system associated with the existing development. A management and maintenance strategy has been set out within the Flood Risk Assessment and Drainage Strategy.

Other Matters

Noise

Policy

- 5.85 The NPPF (para 185) states that development should mitigate and reduce, to a minimum, potential adverse impacts resulting from noise.
- 5.86 London Plan Policies D12 and D13 reiterate that developments should consider how to moderate their noise impacts during construction and use once operational.
- 5.87 LPP2 Policy EM8 sets out that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Assessment

- 5.88 The proposals do not include any noise generating uses or activities. There are also no existing noise generating uses within the surrounding area. The 8 proposed units will be located on top of existing residential units, demonstrating the suitability for the units within this location. The existing stairwells will be used to provide access to the proposed units to ensure that the impact to existing residents is kept to a minimum.

- 5.89 A Construction Management Plan will be secured via Condition following the determination of the planning application. This document will detail how construction will be carried out onsite, taking into account any construction phase impacts of the development that may arise in relation to noise. The plan will set out appropriate mitigation and strategies to ensure that noise and disturbance is kept to a minimum. In addition, construction will not occur outside of agreed hours, i.e. Monday to Friday 8am to 6pm and Saturdays 8am to 1pm.
- 5.90 As set out within the Design and Access Statement, the materials used for the proposed units will be of the highest quality to ensure sound is insulated. Therefore, the proposed development will ensure that there are no unacceptable noise impacts relating to construction and operation and so there are no noise constraints.

Air Quality

Policy

- 5.91 The NPPF seeks to prevent new and existing development being adversely affected by unacceptable levels of air pollution (Para 186).
- 5.92 The London Plan and the Mayor's Air Quality Strategy (2010) seek to minimise the emissions of key pollutants and to reduce concentrations to levels at which no, or minimal, effects on human health are likely to occur.
- 5.93 London Plan Policy SI1 states that proposals should not lead to further deterioration of existing poor air quality or create unacceptable risk of high levels of exposure to poor air quality. Proposals must be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution.
- 5.94 LPP1 Policies SO11 and EM1 also seek to reduce a development's impact on local air quality by incorporating low carbon strategies.
- 5.95 LPP2 policy DME1 14 requires that Development proposals should, as a minimum: i) be at least 'air quality neutral'; ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area".

Assessment

- 5.96 There are currently 13 existing car parking spaces which serve the existing building. As part of this planning application, the proposed 8 residential units will be car-free. In addition to this, 18 cycle parking spaces will be provided in accordance with the London Plan to encourage active and sustainable travel. There will, therefore, be a net benefit to air quality through the reduction in onsite parking.
- 5.97 A Construction Management Plan will be required via Condition following the determination of the planning application. This document will detail how construction will be carried out onsite, taking into account any construction phase impacts of the development that may arise due to fugitive dust emissions. Appropriate mitigation will be put in place to ensure that no significant impacts occur.
- 5.98 Therefore, it can be demonstrated that the proposed minor development will not cause negative impacts on air quality, and the introduction of cycle parking in place of an existing car parking space will encourage active and sustainable forms of transport in a highly accessible location to ensure that there will be a net benefit to air quality, in accordance with national and local policy.

6. Planning Obligations

Community Infrastructure Levy (CIL)

- 6.1 The Community Infrastructure Levy (CIL) applies to 'chargeable development'. This is defined as development of one or more additional units or development seeking an increase to existing floor space greater than 100 sqm. A CIL Questions form (form 1) has been completed and accompany this planning application.

London Borough of Hillingdon CIL

- 6.2 LBH adopted its CIL Charging Schedule on 10th July 2014 and the relevant charging rates are set out in the table below.
- 6.3 On the basis that the proposed development comprises residential dwelling houses (C3), a charging rate of £95 per sqm will apply.

Mayoral CIL 2 (MCIL2)

- 6.4 Mayoral CIL 2 (MCIL2) will also apply to any proposed development, with the MCIL2 charging rates LBH set at £60 per m2.

S106 Heads of Terms

- 6.5 Other than CIL, no further heads of terms are required for this planning application.

7. Summary and Conditions

- 7.1 This Planning Statement has been prepared by Avison Young and is submitted in support of a full planning application for the erection of a one storey rooftop extension to the existing building to provide 8 residential units at 224-231 High Street, Uxbridge, UB8 1LD. This statement assesses the proposed development against national and local planning policy and summarises the key planning considerations that arise within this context.
- 7.2 The proposed development provides the clear benefit of delivering an additional 8 high quality residential dwellings on an existing brownfield site, ensuring that the highly accessible site within Uxbridge Town Centre is optimised/intensified to maximise the efficient use of land. The key planning benefits are summarised as follows:
- Efficient use of a sustainable and accessible brownfield site in a town centre location;
 - The provision of 8 much needed high-quality residential units popular with young families and professionals seeking access to town centre amenities and excellent public transport infrastructure;
 - High quality residential layouts that exceed the space standards set out within the London Plan and comprise outdoor private amenity space;
 - The provision of 18 cycle parking spaces to comply with London Plan standards to encourage sustainable and active forms of travel; and
 - The provision of Community Infrastructure Levy receipts that will help the Council fund the infrastructure, facilities and services needed to support new homes and businesses.
- 7.3 Overall, the proposed development is the result of an extensive design process and accords with the design principles set out in national, regional and local policy guidance.
- 7.4 From an environmental and technical perspective, the potential drainage and heritage impacts of the development have been thoroughly assessed and conclude that there are no constraints that would prevent the development coming forward. This Application demonstrates that the proposed development complies with all relevant planning policy and is therefore acceptable in planning terms.
- 7.5 The proposed development, as discussed and appraised in this Planning Statement, is substantially in accordance with the relevant Development Plan taking account of the material planning considerations. This sustainable development should therefore be approved without delay.

Contact Details

Enquiries

Tim Sturgess
020 7911 2
Tim.Sturgess@avisonyoung.com

Visit us online

avisonyoung.co.uk