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# Planning Statement

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1 Heathrow Boulevard, 286 Bath Road, West Drayton UB7 0DQ

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## 1. Introduction

- 1.1. This Statement has been prepared by Savills (UK) Limited, on behalf of Vantive Limited ('**the Applicant**') to form an application submitted to Hillingdon Council ('**the Council**').
- 1.2. It is intended to assist the Local Planning Authority's ('**LPA**') consideration of a planning application for development at 1 Heathrow Boulevard in the London Borough of Hillingdon ('**the Site**').
- 1.3. The application seeks full planning permission for a change of use and associated external physical works to reconfigure the existing floorspace at the Site. The description of development is as follows:

***'Change of use of part first floor from vacant Office (Class E) to Mixed Use Office / Healthcare Education / Training Facility (Sui Generis)'***

- 1.4. The proposed development will facilitate the occupation of approximately 728 sq. m of vacant floorspace at the Site by Vantive Limited.
- 1.5. Vantive is a newly independent multinational healthcare company committed to advancing vital organ therapies, based on a 70 year legacy as Baxter Kidney Care. Vantive exists to empower patients, their families and the clinicians who care for them, seeking to drive meaningful change in kidney care and organ support through innovative technologies, digital connectivity and services to better support clinicians and service users.
- 1.6. Vantive's UK education centres use digital solutions to optimise care quality and efficiency, training patients both in the centre and remotely, and the landmark ShareResource Connectivity Platform helps empower care teams and patients alike in successful PD therapy, once patients are trained and at home.
- 1.7. The proposed facility will also be utilised as the primary office headquarters for Vantive in the United Kingdom and provide training service users to enable treatment to be undertaken at home.
- 1.8. Heathrow Boulevard has been identified as a suitable location for the Applicant on account of its ability to meet end-user requirements linked to the quality, accessibility and adaptability of the accommodation.

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- 1.9. The application follows a previous application for the change of use (Ref: 79073/APP/2024/2627) of a ground floor suite at 4 Heathrow Boulevard, which was refused by the LPA on 11 December 2024 for a single reason relating to the principle of development.
- 1.10. The revised submission has been specifically formulated to address the reason for refusal of the 2024 Application. This includes the provision of additional information to justify the loss of the existing office function and additional clarification for the proposed operation.
- 1.11. Whilst the subject application relates to an alternative suite at the Heathrow Boulevard estate the Applicant maintains that the previous feedback received regarding the principle of development would still be relevant given the proximity of the two buildings involved and policy considerations that apply to both.
- 1.12. In order to comprehensively assess the proposed development against the relevant planning policies, the remaining sections of this Statement are structured as follows:

<b>Section 2</b>	The Application Site
<b>Section 3</b>	The Proposed Development
<b>Section 4</b>	Pre-Application Engagement
<b>Section 5</b>	Review of Planning Policy Context
<b>Section 6</b>	Assessment of the Proposed Development

- 1.13. We set out in Section 6.0 our Summary and Conclusions which are that:
  - a) the Proposed Development will facilitate the re-occupation of long term vacant floorspace;
  - b) the Proposed Development will deliver substantial economic benefits, including significant private investment and the creation of circa 10 new FTE jobs at the Site plus additional jobs during construction and in the supply chain during operation;
  - c) the Proposed Development will enable essential training to be given to service users who require kidney dialysis, thus reducing number of visits required to Hospital;
  - d) It has been demonstrated that the Proposed Development is acceptable in all other respects, including access, transport / highways, amenity and other environmental matters;

1.14. In light of the above, we further conclude that:

- The Proposed Development accords with the relevant policies in the development plan when read as a whole;
- The Proposed Development accords with the principal material considerations, namely the economic, social and environmental objectives to secure sustainable economic development established by the National Planning Policy Framework ('NPPF'); and
- There are no other material considerations that should outweigh the presumption in favour of granting planning permission for sustainable economic development.

1.15. As the proposal accords with the development plan, planning permission should be granted in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. Furthermore, where an application accords with the development plan, it is sustainable development and should be granted 'without delay' in accordance with Paragraph 11 of the NPPF.

## 2. The Application Site

- 2.1. The application site comprises existing floorspace within the building at 1 Heathrow Boulevard, West Drayton within the London Borough of Hillingdon ('**the Site**').
- 2.2. It specifically relates to an existing first floor suite within the west wing of the building which provides approximately 728 sq. m (GIA) of accommodation. The existing internal layout for the suite is illustrated on Drawing Ref: 110- LEG-8008. A ground floor plan is also submitted to illustrate the means of access.
- 2.3. The subject floorspace is currently vacant and has not been occupied since the previous tenant, NDS Group Limited, vacated in 2016. The wider building comprises three floors of accommodation and was constructed as part of the Heathrow Boulevard Estate which includes 5 freestanding office buildings.
- 2.4. Access to the site is achieved via Heathrow Boulevard, off Bath Road which also serves a number of office premises to the south and east of the Site. The subject building and wider Heathrow Boulevard Estate is served by an existing surface car park (circa 434 spaces) and benefits from dedicated cycle stores which are associated with each building.
- 2.5. The Site is bounded to the south and east by other buildings and car parking related to Heathrow Boulevard; and to the north and west by open land falling within the Green Belt. Further to the south, the wider commercial estate is bounded by the A4 Bath Road dual carriageway, beyond which are airport related buildings and car parks falling within the Heathrow Airport boundary. A residential estate accessed via Sipson Road is located towards the east of the Site.
- 2.6. Given its proximity to Heathrow Airport there are a number of hotels along Bath Road which provide temporary accommodation. This includes the Holiday Inn (UB7 0DQ), Ibis Styles (UB3 5AY), Leonardo Hotel (UB7 0DP) Hyatt Place (UB7 0DG), Radisson Hotel and Conference Centre (UB7 0DU) which are all located within less than 1km from the Site.
- 2.7. The full extent of the Site is identified by the red line on the Site Location Plan. The application site only relates to floorspace on the first floor; none of the other floors are included within the Site. There are circa 105 existing car parking spaces within the red line boundary for the application which are broadly taken to serve the existing building at 1 Heathrow Boulevard.

2.8. There are no listed buildings within the Site's curtilage and it is not located within a Conservation Area.

## Relevant Planning History

### ***The Site***

2.9. We understand that the subject floorspace at the Site was constructed pursuant to planning permission granted on 19 January 1988 for "*Erection of 10,669 sq.m development of Class B1 business floorspace comprising 3 x two storey units, 1 x three storey unit and parking*" at 280-286 Bath Road, Sipson" (Ref: 1355/AM/87/1856).

2.10. This permission was subject to 18no conditions. Condition 14 stated that "*the office floorspace within each individual unit hereby approved notwithstanding the provision of Class B1 of the Town and Country Planning Use Classes Order 1987, shall not exceed 50% of the total gross external floorspace of the premises and the office content shall be directly related to the industrial process carried on within the building*".

2.11. On 20 October 1988, planning permission was subsequently granted for "*Design amendments and re-siting of rear units (2, 3 and 4) of planning permission ref.1355AM/87/1856 dated 19/01/88*" (Ref: 1355/AZ/88/1382).

2.12. This permission was subject to 14no conditions. This included the re-imposition of Condition 10 as attached to Ref: 1355/AM/87/1856 which controlled the use of office floorspace.

2.13. On 25 October 1989, planning permission was granted for "*Removal of condition 10 (limitation of office floorspace) from approved development ref.1355AZ/ 88/1382 dated 20.10.88*" (Ref: 43411/C/89/1580).

2.14. It follows that this permission now controls the permitted use and operation of the floorspace at the Site and wider buildings which form Heathrow Boulevard.

2.15. On 21 July 2020, Statutory Instrument 2020 No. 757 was laid before parliament by the Government. It comprises a number of changes to the Town and Country Planning (Use Classes) Order 1987 which became effective on 1 September 2020.

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2.16. As set out above, the established use of the floorspace at the Site is for 'business' purposes. This operation was formerly classified within Use Class B1 of the Use Classes Order prior to 1 September 2020.

2.17. Statutory Instrument 2020 No. 757 introduces amendments to the Use Classes Order which seeks to simplify the classification of commercial uses. The effect of the new legislation is to revoke Use Classes A, B1 and D and replace those classes with a new, single classification covering 'Commercial, business and service' uses (Class E).

2.18. It follows that the use of the floorspace at the Site is now correctly described as being within Class E of the Use Classes Order. It is also noteworthy that the relevant Permission set out above (Ref: 43411/C/89/1580) does not include any conditions which seek to control or limit the use of the floorspace.

2.19. As the Local Planning Authority will be aware, moving from one operation to another within the same use classification is not development as defined by Section 55(2)(f) of the Town and Country Planning Act 1990 ('the Principal Act'). Section 55(2)(f) states:

(2) *The following operations or uses of land shall not be taken for the purposes of this Act to involve development of the land –*

(f) *in the case of buildings or other land which are used for a purpose of any class specified in an order made by the Secretary of State under this section, the use of the buildings or other land or, subject to the provisions of the order, of any part of the buildings or the other land, for any other purpose of the same class.*

2.20. It follows that the established lawful use of the floorspace at the Site is now for any operation within Class E of the Use Classes Order. This affords the ability for the Site to be utilised for several non-office functions such as financial services, recreation, research and development and medical or health services without any requirement for planning permission.

2.21. Whilst it is acknowledged that the subject application explicitly seeks permission for a bespoke Sui Generis operation the current lawful use of the floorspace at the Site is an important consideration in the context of any perceived loss of office function in accordance with the relevant policies of the Local Plan. Notwithstanding this, it is noted that a quasi-office function would still be maintained at the Site with the wider building at 1 Heathrow Boulevard continuing to be occupied for its existing primary office use (see Section 3 for further details of the proposed development).

2.22. Most recently, planning permission for “*change of use of part of ground floor from Office (Class E) to flexible uses within Class E and / or C2 for residential training centre for dialysis patients, meeting spaces for commercial teams and associated training*” was refused by on 11<sup>th</sup> December 2024 (Ref: 79073/APP/2024/2627).

2.23. The Application was refused for a single reason; namely:

*“The applicant has not submitted supporting evidence or justification to warrant the loss of the existing Class E use and to support the change of use to a proposed Class C2/ Sui Generis use in an out of town, preferred office growth location, Therefore, the principle of development is unacceptable as it is contrary to Policy E2 of Hillingdon Council’s Local Plan Part 1: Strategic Policies (2012), and Policies DMCI 2, DME 2, DME 3 and DMH 8 of Hillingdon Council’s Local Plan Part 2: Development Management Policies (2020), Policies E2, E7, and S2 of the London Plan (2021) and the National Planning Policy Framework (2023).”*

## **Comparable Applications**

2.24. Through the preparation of this application, a number of comparable applications on surrounding sites have been reviewed and assessed. For completeness, some of these are summarised below:

### 2 Heathrow Boulevard

2.25. On 9 December 2014 , planning permission was granted for “*change of use of part of ground floor from Use Class B1a (Offices) to Use Class B1a/D1 (Offices/Non-residential Institutions)*” at Unit 2, Heathrow Boulevard which is located to the south of the Site (Ref: 45195/APP/2014/2014).

2.26. The officer report for this application concluded that the site was within a commercial area and the immediate neighbouring occupiers are commercial in nature, with no residential accommodation in the immediate vicinity that would be affected by the proposed use.

2.27. It was further noted that the proposed change of use would not result in the loss of industrial or warehousing land as the existing use is that of an office.

## Global House, 424 Bath Road

2.28. On 16 May 2022, planning permission was granted for “*change of use of vacant office building (Class E) to church (Class F1)*” (Ref: 36548/APP/2021/4140).

2.29. The officer report for this application concluded that the office building was no longer viable in its existing use and its replacement with a church (community/social infrastructure) is supported by the NPPF and Local Plan. In reaching this conclusion, the Council’s detailed assessment of the proposals found that:

- The building had been vacant for a period of two years and actively marketed for 6 months at the point that the application was submitted. On this basis the loss/replacement of the office use was considered to be acceptable;
- The Borough’s Policy Officer advised that the Site was not a preferred place for an office, providing further support for its replacement;
- The site was located in a mixed use commercial area and is therefore unlikely to harm neighbouring amenities, nor is it out of character;
- The site had a PTAL rating of 1b, suggesting it has very poor accessibility;
- Overall it is therefore considered that the proposed change of use is acceptable and that it would not adversely affect the functioning of any adjoining land or employment land.

## 3 The Square, Stockley Park

2.30. On 5 November 2024, Hillingdon Planning Committee resolved to unanimously approve an application for “*change of use of existing office building (Class E) to a post-operative care facility (Use Class C2), including external works to the building, landscaping, parking, and all associated works*” (Ref: 57328/APP/2024/345).

2.31. The subject building provided circa 8,550 sq. m of floorspace and is located circa 5km to the north-east of the Site at 4 Heathrow Boulevard. Like, Heathrow Boulevard, it is designated as an Office Growth Location but also forms part of a Locally Significant Employment Location.

2.32. The committee report for the application highlighted that the office had been vacant for over three years (since August 2021) and whilst the proposals represented a departure from the local development plan the Applicant had submitted robust evidence to justify the change of use. Critically, this included the submission of a marketing report which demonstrated that there was subdued demand for office space across West London and specifically within LB Hillingdon.

## 3. The Proposed Development

### Background to the Proposals

- 3.1. The proposed development is required to facilitate the re-occupation of the existing vacant floorspace at the Site by Vantive Limited ('Vantive').
- 3.2. Vantive Limited is a multinational standalone company and leader in kidney disease and other vital organ support therapies. Vantive provides a range of innovative technologies, digital connectivity and services focused on the needs of clinicians and patients in more than 70 countries worldwide. The training centre aims to provide state of the art education on the various devices and platforms, including the Sharesource Connectivity Platform enabling remote patient monitoring, for successful PD therapy at home, and TrueVue technology providing timely data to support CRRT management in the acute setting. Vantive provide training, and a wealth of advanced services, including virtual reality, to help improve the therapy experience for both patients and Health Care Professionals.
- 3.3. The company currently operates two training centres within the United Kingdom; namely in Kew, London and Swinton, Manchester. Referrals to these centres come directly from the service user's own NHS specialist centre and no clinical healthcare would be provided at the Site. Whilst the service users are termed patients by the NHS, they are not patients of Vantive, but rather attending the sites to avail of its training service.
- 3.4. Heathrow Boulevard has been identified as the preferred location for a new centre given its proximity to the surrounding road network, enhanced transport links and existing parking capacity. This would replace the existing centre in Kew and would enable Vantive to increase referrals and be more accessible to more service users within the catchment that the centre would seek to serve.
- 3.5. In addition to the training function, the proposed facility would also serve as Vantive' UK office headquarters. This would encompass typical office elements such as workstations and meeting rooms which enable field and home based staff to access a fixed location to conduct regular catch ups.

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3.6. The Heathrow location is particularly crucial to facilitate access for employees within the wider United Kingdom, Ireland and Nordics Cluster ('UKIN') who would regularly attend such meetings. A review has identified that Heathrow is one of the few airports that offers direct flights from Norway, Denmark, Sweden and Finland and so sites within the vicinity of that has been the focus of the search. It follows that there is a locationally specific requirement attached to the proposed occupation of the premises at Heathrow Boulevard.

## **The Proposed Development**

3.7. In order to meet the requirements of Vantive Limited, this application seeks planning permission for change of use of the existing office use (Class E) to a bespoke mixed use office / healthcare education / training facility (Sui Generis).

3.8. The formal description of development is as follows:

***"Change of use of part first floor from vacant Office (Class E) to Mixed Use Office / Healthcare Education / Training Facility (Sui Generis)"***

3.9. The principal elements of the proposed development are described in more detail below.

### ***Change of Use***

3.10. As set out in Section 2.0, the established use of the floorspace at the Site is for 'office' purposes. Notwithstanding this, it is noted that there are no restrictions which explicitly remove the provisions of the Use Classes Order such that the lawful use is for any operation within Class E.

3.11. The proposed development seeks to facilitate the occupation of vacant floorspace through the introduction of a bespoke 'Sui Generis' use that would maintain the existing office function alongside the introduction of essential training for individuals who require kidney dialysis.

3.12. Once trained the service users are able to do self-dialysis in the privacy of their own homes thus reducing number of visits required to Hospital. At present this training is carried out within NHS Hospitals and facilities, so the process of outsourcing this service reduces the impact on the NHS and their facilities. Whilst the centre will be privately owned and operated it will serve NHS patients.

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- 3.13. The proposed facility will accommodate a maximum of 10 service users during any one session. Each service user may attend the centre for treatment alone or with a partner or carer so at any one time there could be a maximum of 20 visitors to the site each day. Certain treatments may require more complicated instruction and so the ability to stay in residential accommodation (5 rooms) is also offered. This allows up to 5 service users to practice the dialysis in a more domestic setting, similar to that they may find at home, as well as having access to a member of staff should any assistance be required.
- 3.14. A typical training course would take place between 9am and 4pm (Mon-Fri) over the course of 3 days. Currently no training or associated overnight stays takes place at weekends. All those attending are able to travel to the facility independently and as such there is no requirement for hospital transportation such as ambulances.
- 3.15. Various teaching methods are used for training, such as group work or one-to-one instruction with nurses to ensure that confidence is built in how to use the equipment. Service users are discharged when they and everyone involved in their training feels confident and happy that they can manage their treatment at home. Following discharge, continuing clinical support is provided by the service user's specialist NHS unit.
- 3.16. Whilst dedicated provision is sought for a 'residential' use, it is not the intention that this will operate independently of the wider training operation. Furthermore, the hours and temporary nature of the overnight stay element is considered to be compatible with the operation of the wider Heathrow Boulevard campus i.e. any office uses would typically end at the same point that the training course does such that there would be no conflict. This position isn't wholly dissimilar to the relationship between the established employment function at Heathrow Boulevard and adjacent hotels located on Bath Road.
- 3.17. The indicative layout of the facility is illustrated on the General Arrangement Plan included as part of this submission. This includes meeting space for commercial healthcare teams which allow for additional training, events and educational purposes relating to the care and training which Vantive Limited provide.
- 3.18. Within the clinical areas, as shown on the indicative internal layout, there will be up to 5no staff members between the hours of 07:00 – 19:00 plus an additional 1no staff member to cover the night time shift between 19:00 – 07:00. Therefore, the Site is required to operate on a 24 hour basis. A further 3no staff would utilise the office floorspace at the Site on a typical day-to-day basis.

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- 3.19. Given the global nature of the Vantive business, further employees would visit the Site on a more infrequent basis for face-to-face meetings and conferences. The irregularity of such events means that this would not trigger any material impacts on the operation of the surrounding highway network.
- 3.20. The proposed development would also result in opportunities within the local supply chain on account of requirements for grocery deliveries, laundry and refuse collection and cleaning.

## Access and Servicing

- 3.21. The proposal will utilise existing access arrangements for the building, including disabled access. The accessibility of the Site and proposals is examined in further detail within the Accessibility Statement. This includes the creation of the dedicated entrance for individuals undertaking training.
- 3.22. An external refuse store is located within the surface car park to the north of the subject premises and would be utilised by the Applicant alongside the other tenants who occupy the wider building. There is the potential for additional waste collection which will be instructed separately by the Applicant if required.
- 3.23. The proposed operation will benefit from dedicated car parking provision within the existing surface car park. This will specifically encompass 23x standard bays, 3x accessible bays and 2x EV bays as detailed in the below image. It is proposed that the proposed parking provision is secured by condition.



- 3.24. The cycle parking requirements associated with the proposed use will be met within the existing cycle parking at the Site which are located to the rear of the subject building. The existing cycle parking allows for 16 cycles. A detailed analysis of accessibility and servicing is provided within the submitted Transport Statement, prepared by TTP Consulting.

## 4. Pre-Application Engagement

- 4.1. The submission of this planning application follows a period of pre-application consultation with officers at Hillingdon Council. This included a formal pre-application meeting with Christopher Brady (Area Team Leader) and Christos Chrysanthou (Senior Planning Officer) at the LPA on 14 April 2025.
- 4.2. Hillingdon Council issued its formal pre-application response to the Applicant on 28 April 2025. This concluded that despite the policy departure and previous refusal a future planning application could be supported following the informative pre-application discussions.
- 4.3. In addition to agreeing the planning policy context within which the proposals would be considered, the pre-advice confirmed the scope of information required to support the submission of the planning application.
- 4.4. A copy of the written pre-application advice is provided at **Appendix 1**.
- 4.5. It is noted that the pre-application enquiry related to a suite within another building which forms part of the Heathrow Boulevard Estate (Building 4). Following the receipt of the pre-application advice, an alternative suite was offered to the Applicant by the landlord for occupation. This suite is marginally larger than that within 4 Heathrow Boulevard (circa 120 sq. m additional floorspace) and better suits operational and accessibility requirements given its proximity and frontage to Bath Road.
- 4.6. Given the proximity of 1 and 4 Heathrow Boulevard and the policy designations that relate to both, the Applicant maintains that the pre-application feedback received in April 2025 still applies to consideration of the Site which is the subject of this application. It follows that the subsequent sections of this Statement address the relevant policy requirements as identified during pre-application engagement regarding the suite at 4 Heathrow Boulevard. Where relevant, information pertaining to the occupation of the suite in 1 Heathrow Boulevard and marketing evidence to justify the loss of office floorspace have been prepared accordingly and form part of this submission.

## 5. Review of Relevant Planning Policy

### Introduction

- 5.1. The starting point for the consideration of the acceptability of a development proposed in a planning application is the assessment of it against the development plan. If a development is in accordance with the plan, and the plan is up-to-date, then the decision should be to grant planning permission unless material considerations indicate otherwise. The NPPF does not change the statutory basis on which planning decisions are founded. Section 38 (6) of the Planning and Compensation Act 2004 remains the key decision making principle.
- 5.2. A decision on a proposed development must be made in accordance with the development plan unless material considerations indicate otherwise. Material considerations can include, amongst other things, more up to date policy guidance in the NPPF, Planning Policy Guidance ('PPG'), site specific and operational circumstances.
- 5.3. LPA's should have proper regard to such statements and must give clear and convincing reasons if they elect not to follow them. Emerging development plan policies are material considerations, although the weight to be attached to them varies according to their current status.
- 5.4. The statutory development plan relevant to the consideration of the proposals are as follows:
  - The London Plan 2021, adopted March 2021;
  - Hillingdon Local Plan Part 1 – Strategic Policies, adopted November 2012;
  - Hillingdon Local Plan Part 2 – Development Management Policies, adopted January 2020;
- 5.5. The policies of specific relevance to this development contained in the documents listed above are summarised below. An assessment of the proposed development against the relevant policy criteria specific to the principle of development is included within the following sections of this Statement

## The Development Plan

### *The London Plan 2021*

5.6. The London Plan provides the spatial development strategy for Greater London and sets out the Mayor of London's overall strategic plan for London. It was formally adopted on 2 March 2021 and supersedes the previous London Plan 2016.

5.7. The London Plan is supported by a number of Supplementary Planning Guidance (SPG) and Best Practice Guidance (BPG) documents which will be referred to in this Planning Statement as appropriate.

5.8. The key London Plan policies relevant to the determination of the application are set out below:

- Policy GG2 – Making the best use of land;
- Policy GG3 – Creating a healthy city;
- Policy GG5 – Growing a good economy;
- Policy GG6 – Increasing efficiency and resilience;
- Policy D5 – Inclusive design;
- Policy D14 – Noise;
- Policy S2 – Health and Social Care Facilities;
- Policy E1 – Offices;
- Policy T5 - Cycling;
- Policy T6 – Car Parking; and
- Policy T7 – Deliveries, servicing and construction

### *The Hillingdon Local Plan Part 1 – Strategic Policies*

5.9. The Local Plan Part 1 is the key strategic planning document for Hillingdon and sets out the long-term vision and objectives for the Borough for the period 2011-2026. A key component of the Council's vision is the delivery of new housing, employment and infrastructure within the Borough, whilst also safeguarding and enhancing heritage assets and combating climate change.

5.10. In respect of employment land, the Local Plan includes strategic objective (Policy S015) which seeks to protect this for employment uses to meet the needs of different sectors of the economy. It is also stated that the Council will manage the release of surplus employment land for other uses.

- 5.11. Local Plan Policy E2 states that during the plan period, most of the employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations (SILs), Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge Town Centre and Hayes Town Centre with a particular focus around transport nodes.
- 5.12. Local Plan Policy CI1 outlines the need for preserving, improving and increasing the amount of community infrastructure in the Borough. This includes community centres, schools, youth facilities, police facilities and health facilities.

### ***The Hillingdon Local Plan Part 2 – Development Management Policies DPD***

- 5.13. The Local Plan Part 2 - Development Management Policies DPD was adopted in January 2020 and provides detailed policies which form the basis of the Council's decisions on individual planning applications.
- 5.14. The Council's policies map was updated to reflect the changes introduced by the Local Plan Part 2. It is noted that the Site is now understood to be undesignated and sit outside any Office Growth Location.
- 5.15. The key policies relevant to the determination of the application are set out below:
  - Policy DME 2 – Employment Sites Outside Designated Employment Areas
  - Policy DME 3 – Office Development
  - Policy DMHB 11 – Design of New Development;
  - Policy DMHB 15 – Planning for Safer Places;
  - Policy DMT 1 – Managing Transport Impacts;
  - Policy DMT 2 – Highways Impacts;
  - Policy DMT 4 – Public Transport

### **National Planning Policy Framework**

- 5.16. The National Planning Policy Framework was updated on 12 December 2024 and constitutes guidance for local planning authorities and decision takers and is a material consideration in the determination of planning applications (paragraph 2).

5.17. In this context, paragraph 8 further states that achieving '*sustainable development*' means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These are

- An **economic** objective which includes ensuring that enough land of the right types is available in the right places and at the right time to support growth;
- A **social** objective which includes securing strong, vibrant, and healthy communities; and
- An **environmental** objective which includes protecting and enhancing our natural, built, and historic environment, including making effective use of land and improving biodiversity.

5.18. Paragraph 11 sets out the 'presumption in favour of sustainable development'. For decision taking this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

5.19. Chapter 6 relates to "building a strong, competitive economy" and highlights the need for a clear economic vision and strategy that encourages sustainable economic growth.

5.20. Paragraph 85 specifically details that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

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- 5.21. Paragraph 87 outlines that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clustering of economic sectors.
- 5.22. Chapter 8 entitled '*Promoting healthy and safe communities*' states that planning policies should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 5.23. Paragraph 98 states the requirement for planning policies and decisions to take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community whilst ensuring an integrated approach to considering the location of economic and community facilities and services.
- 5.24. Paragraph 124 states that planning policies and decisions should promote the effective use of land in meeting the needs for other uses and ensure safe and healthy living conditions.
- 5.25. Paragraph 125 states that Local Planning Authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.
- 5.26. Paragraph 200 states that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

## 6. Assessment of the Proposed Development

- 6.1. As set out at Section 5, the NPPF constitutes formal guidance for a LPA and is an important “material consideration” in determining applications. It makes it clear that “development plans” ought to be consistent with the objectives, principles and policies set out at national level and in particular reflect the presumption in favour of sustainable development.
- 6.2. The objective of the simplification of national planning policy is to reduce the bureaucracy associated with the planning process and help promote development and economic growth. The NPPF includes an explicit presumption in favour of sustainable development. The Government expects that this presumption should run through all plan making and decisions on planning applications.
- 6.3. This section provides an assessment of the proposed development and its compliance with the relevant policies and guidance.
- 6.4. We also provide a summary of the changes made and additional evidence provided as part of this submission to respond to the reasons for refusal on the 2024 Application.

### Principle of Development

#### ***Loss of Employment Use***

- 6.5. The application proposes the change of use of vacant office floorspace (Class E) into a bespoke mixed use office / healthcare education / training facility (Sui Generis).
- 6.6. London Plan Policy E1 notes that office markets should be consolidated, and where viable, extended, focusing new development in town centres and other existing office clusters. The Policy also states that the redevelopment and/or change of use of surplus office space to other uses can be supported in principle subject to meeting provisions associated with Parts G and H.
- 6.7. The floorspace at the Site measures circa 728 sq. m and could not feasibly be sub-divided to create smaller units at a more affordable rate in a multiple occupancy model – it already represents a small contained suite within a larger host building.

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6.8. At a local level, Hillingdon Local Plan Part 2 Policy DME 2 states that proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:

- i. the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
- ii. the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
- iii. Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or
- iv. The new use will not adversely affect the functioning of any adjoining employment land; or
- v. The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.

6.9. Local Plan Policy DME 3 relates more specifically to office development. This states that proposals involving loss of office floorspace in preferred locations for office growth, which fall outside of existing permitted development procedures, should include information to demonstrate that:

- i. the site has been actively marketed for two years;
- ii. the site is no longer viable for office use, taking account of the potential for internal and external refurbishment; and
- iii. surrounding employment uses will not be undermined

6.10. It follows that the adopted policy position seeks to protect against the loss of employment / office floorspace at the Site and within the wider 'Heathrow Perimeter'.

6.11. Whilst It is acknowledged that the proposed use of the site conflicts with the general principle of Local Plan Part 2 Policies DME 2 and DME 3 it is noted that circumstances exist where that can be accepted if justified.

6.12. The London Borough of Hillingdon Employment Land and Capacity Study (2023) states that there was approximately 190,654 sq. m of available office floorspace within the Borough as of mid-2023. This compares to a projected demand for between 95,831 – 130,343 sq. m gross floorspace for the period to 2038. It is concluded that such a demand can be met almost entirely by existing supply over the short-to-medium term.

6.13. The Study also recommends consolidating office uses to the most appropriate locations; namely Uxbridge Town Centre and Stockley Park. Conversely, the area to the north of Bath Road is recognised to comprise a mix of uses including a hotel and a small office park (Heathrow Boulevard). The office park is identified to have vacancies and inefficiently used so presents opportunities for re-development providing more intense and in-demand industrial uses. It follows that the Council's evidence base supports the release of office floorspace to alternative uses at Heathrow Boulevard in principle.

6.14. The loss of office floorspace also needs to be considered in the context of current market trends. As set out within the supporting evidence submitted in respect of the recent application at The Square, Stockley Park (Ref: 57328/APP/2024/345) there is a low and declining demand for business park office space within LB Hillingdon. This has resulted in a vacancy rate which is considerably above the level required to allow for choice, churn and competition and indicates an oversupply of space. It follows that there is scope for the loss of office floorspace to facilitate a balancing of supply and demand

6.15. As set out at Section 2, the subject suite has been vacant for a period of over 3 years. The remainder of the Heathrow Boulevard business park also has a high vacancy rate of over 29%, with this anticipated to increase with upcoming lease events. Some suites have been available for a period of over 10 years which indicates that demand is low regardless of the size or characteristics of what is available. The position at Heathrow Boulevard is characteristic of the wider market trends referred to above and points to a clear lack of demand for office space.

6.16. The application is supported by a Marketing Report, prepared by Savills. This confirms that the existing floorspace at the Site has been marketed since 2016, when the previous tenant, NDS Group Limited, vacated. In spite of this, interest levels have been limited, with only 35 enquiries and 18 viewings undertaken since the start of 2022.

6.17. Section 3 of the Marketing Report provides a summary of the enquiries that have been received as part of the marketing process. It should be noted that those enquiries highlighted in red are general prospects issued to the wider agency market through a platform called Agents Society. These 'prospects' are not direct enquiries for the property, and have simply been targeted by the marketing agent based on a search they are aware of in the market through the Agents Society platform.

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- 6.18. During the marketing period a comprehensive range of established methods, including on-site advertising, online promotions, print media, and telephone marketing have been utilised. The marketing agent has also actively targeted various companies and property agents to inform them of the availability of the subject property. Of the enquiries received detailed in Section 3 of the Marketing Report, only 1 company requested a proposal for terms with a further 6 viewings being undertaken.
- 6.19. Whilst all efforts have been made to market the floorspace to office occupiers, the most significant amount of recent interest has been received from health operators.
- 6.20. Regard should also be had to Section 11 of the NPPF, which clarifies that planning policies and decisions need to reflect changes in the demand for land. Specifically, local planning authorities are encouraged to take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans (paragraph 123).
- 6.21. London Plan Policy GG2 also seeks to make the best use of land through enabling the development of brownfield land in Opportunity Areas.
- 6.22. As set out above, Vantive is an established healthcare provider which is seeking floorspace within the LB Hillingdon to meet the requirements of its operation. The proposed Site comprises a vacant suite within an existing office building and would be brought back into active use as a result of the proposed development.
- 6.23. The marketing exercise that has been undertaken demonstrates that very little interest has been forthcoming from office occupiers and a tenant has not been secured for that use.
- 6.24. Critically, the floorspace is now considered to be a 'long term' vacancy on account of the period it has remained unoccupied. It follows that there is no current demand or projected re-occupation for office use in the short to medium term.
- 6.25. Based on the unique characteristics of the Site, the proposed change of use of a single suite within the building will not have any unacceptable impact on the strategic policies relating to employment land supply and economic growth. Conversely, it would actively promote the re-occupation of vacant floorspace by a new entrant into the Hillingdon market and facilitate investment into the building and wider physical and economic regeneration to be realised.

6.26. The proposed operation would also ensure that a quasi-commercial function is maintained at the Site on account of the premises providing the UK office headquarters for Vantive Limited. This would result in the creation of up to 10 FTE jobs related to the administrative and training elements of the proposed operation alongside indirect positions associated with service contracts and local suppliers.

6.27. By comparison, an existing office suite of a comparable size at Heathrow Boulevard currently supports approximately 20 jobs but in reality occupation levels have been lower than this post Covid-19 on account of changes in working practices.

6.28. In addition, the remaining balance of floorspace within the building at 1 Heathrow Boulevard (circa 2,617 sq. m net internal area) which further reinforces the position that sufficient supply would still exist to meet what is currently a relatively muted demand.

6.29. Notwithstanding this, the Applicant would be prepared to accept the imposition of a condition which requires the floorspace to revert back to the former office use at the cessation of the bespoke operation which is proposed. This would provide comfort that the office function would not be permanently extinguished and ensure that it could be occupied for that purpose again in the future without a requirement for planning permission.

### ***Proposed Vantive Operation***

6.30. As set out above, the proposed development is required to facilitate the re-occupation of the existing vacant floorspace at the Site by Vantive Limited.

6.31. The NPPF outlines in Paragraphs 85 and 87 that significant weight should be placed on the need to support economic growth and productivity, as well as considering the needs of the local area. The marketing evidence set out above highlights that there is a long-term dip in office demand at Heathrow Boulevard, and therefore alternative employment uses would support economic growth and productivity in the area.

6.32. Paragraph 96C of the NPPF also states that planning decisions should aim to achieve health, inclusive and safe spaces through enabling and supporting health lifestyles, especially where this would address identified local health and well-being needs.

- 6.33. London Plan Policy GG3 strives to plan for appropriate health and care infrastructure to address changing needs. The supporting text to this policy specifically highlights the role that the Mayor will play in bringing together a diverse range of stakeholders from service providers, boroughs, communities and the private sector in order to provide a more integrated approach to promoting a healthy city and reducing health inequalities.
- 6.34. Policy S2 of the London Plan details that Boroughs should work with NHS and community organisations to identify local health needs, and also support development proposals that provide high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.
- 6.35. The supporting text to this policy refers to the NHS Long Term Plan which identified the need to transform the way that care is organised and delivered to meet increasing demands. This includes increasing support for people to manage their own health better and undertaking a higher proportion of healthcare in community rather than hospital settings.
- 6.36. In addition, the NHS England Getting It Right First Time (GIRFT) programme is a national programme designed to improve the treatment and care of patients through in-depth review of services, benchmarking, and presenting a data-driven evidence base to support change. Renal care is one of the Medical Specialities which is focused on in the context of this objective.
- 6.37. As set out in Section 3, Vantive are seeking to occupy the Site for a bespoke use which will include an office and healthcare education / training component. The training element will specifically enable experienced and fully qualified nurses to educate service users about their disease, and provide coaching and support to help equip them and their families or healthcare professionals with all the necessary skills and knowledge to manage their treatment at home.
- 6.38. No clinical interventions or direct healthcare is provided at the Site. Conversely, service users are simply learning to undertake care they will go on to provide for themselves within their own homes. It follows that individuals who attend training will be independent with their care need.

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6.39. The facility therefore aligns directly with NHS goals to increase self-care capacity, reducing pressure on hospital-based services. It follows that it will improve patient autonomy and health incomes whilst lowering the burden on NHS resources. The Applicant currently does this successfully at their existing facilities in Kew and Swinton which are both now well established.

6.40. The proposed facility will also provide products and services for Intensive Care Areas in both Hillingdon and Harefield Hospital, wider London and nationally. This includes training for healthcare professionals across Intensive Care Acute Units and Therapies (for Haemofiltration and Continuous Renal Replacement Therapy (CRRT)), and for Renal Care Professionals (for Peritoneal Dialysis (PD), Home Haemodialysis (HHD) and Haemodialysis (HD) training).

6.41. The provision of this service represents significant inwards investment in Hillingdon by Vantive and signals it as a hub for healthcare innovation which is an important public benefit of the proposals.

6.42. At a local level, Hillingdon Local Plan Part 2 Policy DMCI 2 states that proposals for the provision of new community facilities will be supported where they :

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

6.43. The pre-application advice received from the Council requested that the Applicant should demonstrate why the Site is the most suitable location for the proposed use and provide details of any alternatives which had been discounted.

6.44. Vantive undertook a comprehensive site search over a period of 4 months to inform selection of the optimum location. This included consideration of sites in multiple London Boroughs which had the potential to meet its requirements. A primary requirement for the search was proximity to Heathrow Airport and referring hospitals.

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6.45. As set out at Section 3, the proximity to Heathrow is particularly crucial to facilitate access for employees within the wider Vantive commercial business, who are located within the United Kingdom, Ireland and Nordic Clusters. The total employee count within the commercial business is currently 200 and whilst there would be no requirement for all to access the Site simultaneously there would be a requirement for a proportion to attend regular in person meetings.

6.46. A review has identified that Heathrow is the only airport which offers direct flights from the Nordic Regions (Denmark, Sweden and Finland) and therefore sites within the vicinity of this has been the focus of the search. It follows that there is a locationally specific requirement attached to the proposed occupation of the premises at Heathrow Boulevard given its close proximity to the airport.

6.47. Whilst Local Plan Part 2 Policy DMCI 2 seeks to locate new community uses in the most sustainable locations (i.e. town centres) the proposed use is bespoke and has specific operational requirements. In addition to the locationally specific requirement to be close to Heathrow Airport the proposed centre also requires a dedicated parking provision (circa 24 spaces), DDA compliant access and the opportunity for overnight residential stays. The nature of the proposed operation also drives a requirement for regular deliveries / collections of medical products, clinical waste, food supplies, laundry and refuse.

6.48. A number of alternative sites that were reviewed did not meet the above requirements on account of their current condition, accessibility or insufficient car parking provision. The size and frequency of deliveries and ability to accommodate overnight stays also means that a typical site within a town centre would not be a feasible location to accommodate the proposed operation.

6.49. Notwithstanding this, the premises at Heathrow Boulevard benefits from good links to public transport links given its proximity to a major international airport and adjacent hotels along Bath Road. This position was acknowledged by the Highway Authority during pre-application engagement on the proposed development.

6.50. It is also noted that the Council previously granted permission for the change of use of Global House from office to church in 2022 despite this premises having a PTAL rating of 1b, suggesting it has very poor accessibility (Ref: 36548/APP/2021/4140). Global House is located circa 1.8km to the west of Heathrow Boulevard but was deemed to be a sufficiently sustainable location in the context of meeting a requirement for a new community facility.

## Highways and Transportation

6.51. Policy T2 Part A of the London Plan (2021) states - Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

6.52. At a local level, Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

6.53. Policy DMT 5 Part A of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) further states that Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network.

6.54. The application is supported by a Transport Statement (**TS**) prepared by TTP Consulting.

6.55. As set out at Section 2 of the Statement, the surrounding area is predominantly commercial in nature and benefits from close proximity to Heathrow Airport, which is a primary source of employment and related services.

6.56. Given the nature of the operation it is anticipated that a proportion of journeys would be undertaken by car however the Site is also accessible by other modes, being within walking and cycling distance of residential and public transport opportunities. There are footways adjacent to all of the streets in the immediate vicinity with bus services calling at stops adjacent to the Heathrow Boulevard Estate.

6.57. The closest bus stops are located on Bath Road approximately 80 – 100m either side of the Estate Access with the stops served by buses on Routes 81, 423, A4 and U3 providing connections to Hounslow, Heathrow Airport and Slough.

6.58. Rail services are available from Heathrow Airport and Hatton Cross to the south, or from Hayes and Harlington to the north with access to the Piccadilly Line and the Elizabeth Lines.

6.59. Given its proximity to Heathrow Airport the Site has a Public Transport Accessibility Level (PTAL) Rating of 3 which indicates a moderate level of access to public transport.

6.60. At Section 3, the Transport Statement demonstrates that the proposed change from 'offices' to 'residential' use will have a beneficial impact in terms of the number of vehicle movements on the local highway network. Section 3 identifies that the conversion of the office floorspace to residential would result in a significant reduction in two way trips per day as a result of the proposed development (as residential use generates fewer movements than the existing office use). It follows that the proposed conversion of the floorspace at the Site will deliver betterment in terms of local highway capacity.

6.61. Policy T6 Part D of the London Plan (2021) states - The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.

6.62. At a local level, Policy DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) seeks to ensure that all development is in accordance with the car parking standards set out in Appendix C, Table 1 unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

6.63. As set out at Section 2, the Heathrow Boulevard Estate is served by an existing surface car park which provides circa 344 spaces. Of these, approximately 105 spaces are associated with the subject building at 1 Heathrow Boulevard and included within the red line boundary for this application.

6.64. The proposed Sui Generis use for which planning permission is sought will benefit from dedicated provision within the existing surface car park. This will specifically encompass 23x standard bays, 3x accessible bays and 2x EV bays.

6.65. The total provision (28 spaces) is sufficient to cater for the requirements of the bespoke operation. Furthermore, there would be circa 77 spaces which are retained for use by other occupiers within 1 Heathrow Boulevard with a further 357 existing spaces within the wider car park for use by other buildings / tenants that make up the wider estate.

6.66. The TS demonstrates that the existing car park would continue to operate well within its existing capacity and the proposals would not result in a deleterious impact on the surrounding highway network.

- 6.67. As previously set out, the existing cycle storage at the Site includes provision for 16 cycle spaces within the business park. This includes a dedicated store which is located to the rear of the subject building at 4 Heathrow Boulevard.
- 6.68. The proposed development seeks to allocate 3no spaces within this store for use by the Applicant. This provision is considered to be appropriate for the bespoke operation and accords with Policy DMT 2 with regard to cycle parking.
- 6.69. It is noted that the proposed car and cycle parking provision accords with that which was proposed as part of the 2024 Refusal and was considered to be acceptable by the Highway Authority.
- 6.70. Arising from the above, the proposed development will not result in an unacceptable impact on highway safety or result in severe impacts on the road network against the terms of the NPPF paragraph 111, and complies with the relevant policies of the adopted Local Plan. The proposed development is entirely acceptable in transport and accessibility terms.

## Amenity

- 6.71. Policy D3 of the London Plan (2021) states Part D7) that development proposals should deliver appropriate outlook, privacy and amenity.
- 6.72. Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) seeks to ensure that development proposals do not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 6.73. The supporting text for this policy states that the Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook.
- 6.74. Given the specifics of the proposed use and core hours of operation it would not generate any significant level of noise and as such there are no envisaged impacts on neighbouring residential amenity. This position is supported by the officer report for the 2024 Refusal and pre-application feedback received in April 2025 regarding the suite at 4 Heathrow Boulevard.

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6.75. To accommodate the change of use requirements, the internal spaces have been designed with sound attenuation between rooms at a maximum of around 50dB, in line with modern office standards. This level of attenuation is sufficient, as no activities within the demised area are expected to generate noise exceeding this threshold. Consequently, noise levels are not anticipated to surpass the previous parameters for which the space was or is expected to be used.

6.76. The proposed construction in the Vantive space will also meet all relevant requirements associated with accommodating provision for overnight stays. This specifically includes:

- All areas where confidentiality is required (such as service user accommodation, bathrooms, meeting spaces, division between clinical and commercial spaces) will be created using 122mm thick partition walls, reaching from the uppermost limit of the ceiling void to the base of the floor void ("slab to slab"), with a 12.5mm soundproofed wallboard on either side. There will also be a 25mm acoustic partition roll to the cavity;
- All other walls (in areas such as store rooms, kitchen areas and training spaces) will be 122mm thick partition walls, from the uppermost limit of the ceiling void to the base of the floor void ("slab to slab"), with a standard wallboard to either side and 25mm acoustic partition roll to the cavity. The 3 training areas will have adjoining folding walls to allow them to be opened up as necessary;
- Bathrooms will also use moisture resistant wallboard, and ply patressing will be in place throughout to support any furniture or equipment as necessary as well;
- All internal glazed areas will be fitted with 12.8mm single glazed acoustic glass from raised access floor to underside of ceiling; and
- The existing external Air Handling Units (AHUs) will be retained, with no requirement for supplementary units. It follows that external noise from plant equipment will not exceed the levels previously experienced.

6.77. The above mitigation measures will ensure that there is no discernible noise transmission between the first floor suite which would be occupied by Vantive and the wider building. It follows that prospective service users who stay overnight will not be impacted by any continued use of the upper floors of the building or wider estate for commercial purposes. As set out at Section 3, the overnight stay element is also not a traditional residential use and is more closely aligned with the more transient nature of the hotels that are adjacent to Heathrow Boulevard.

## 7. Summary and Conclusion

- 7.1. This Planning Statement relates to an application for proposed development at 1 Heathrow Boulevard in London Borough of Hillingdon.
- 7.2. The application seeks full planning permission for a change of use and associated external physical works to reconfigure the existing floorspace at the Site and enable its occupation by Vantive Limited.
- 7.3. We conclude that the proposed development accords with a series of strategic objectives of the adopted and emerging development plan and all other material considerations including the overarching objectives of the NPPF.
- 7.4. Accordingly, we respectfully recommend that planning permission should be granted in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

## **Appendix 1 – LBH Pre-Application Advice (April 2025)**

# Officers Report

Planning Applications Team  
Hillingdon Council  
Civic Centre, High Street  
Uxbridge  
UB8 1UW

Chris Moore  
Savills  
33 Margaret Street  
London  
W1G 0JD

Tel: 01895 250230  
Case Officer: Christos Chrysanthou  
Email: cchrysanthou@hillingdon.gov.uk  
Date: 28th April 2025  
Our Ref: 79073/PRC/2025/38

Dear Chris Moore

**RE:** Proposed change of use from vacant office to office/ healthcare education/ training facility (Sui Generis)

**SITE:** SUITE 5 GROUND FLOOR, 4 HEATHROW BOULEVARD BATH ROAD HARLINGTON

I refer to your request for pre-application planning advice dated 11-03-25 and our subsequent meeting on 14-04-25 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration.

**Drawing Nos:** Site Location Plan Received: 11th March 2025  
00.106 E Received: 11th March 2025  
Cover letter, 3 Received: 11th March 2025  
March 2025,  
Savills

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

## The Site and Surrounds

The application site comprises part of the ground floor of an existing irregularly shaped office building, which is located within the Heathrow Boulevard office complex on the north side of Bath Road in Sipson. The floor area of the application site is noted to be 608sq.metres.

The current use of the site is as Class E(g)(i) - Offices and the application form states the site has been vacant since October 2022. Heathrow Boulevard comprises 5 office buildings and the application site is known as Building 4 which is the northernmost building in the complex. The designated Green Belt is located to the west of the site. The site is designated as part of the Heathrow Perimeter core growth area

as identified in the Hillingdon Local Plan Part 1 (2012).

## **The Proposal**

Pre-application is advise is sought for the proposed change of use from vacant office to office/ healthcare education/ training facility (Sui Generis).

## **Planning Policy**

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

The London Plan (2021)

The West London Waste Plan (2015)

## **Material Considerations**

The National Planning Policy Framework (NPPF) (2024) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

The proposed development has been assessed against the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020), including Supplementary Planning Guidance, and all relevant material considerations, including The London Plan (2021) and national guidance.

## **Part 1 Policies:**

### **Other Policies**

LPP E1	(2021) Offices
DMCI 2	New Community Infrastructure
DME 2	Employment Uses Outside of Designated Sites
DMH 8	Sheltered Housing and Care Homes
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP E2	(2021) Providing suitable business space
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP T2	(2021) Healthy Streets
LPP T5	(2021) Cycling
LPP E4	(2021) Land for industry, logistics and services to support London's economic

	function
LPP E5	(2021) Strategic Industrial Locations (SIL)
LPP S3	(2021) Education and childcare facilities
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T6	(2021) Car parking
LPP T6.2	(2021) Office parking
DME 3	Office Development
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land
NPPF6 -24	NPPF6 2024 - Building a strong, competitive economy
NPPF7 -24	NPPF7 2024 - Ensuring the vitality of town centres
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport

## Main Planning Issues

### Principle of development

#### PRINCIPLE OF DEVELOPMENT:

Paragraph 91 of the NPPF (2024) states - 'Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.'

Paragraph 92 of the NPPF (2024) states - When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

Paragraph 124 of the NPPF (2024) states - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Policy E2 of the London Plan (2021) Part C states - Development proposals that involve the loss of existing B Use Class business space (including creative and artists' workspace) in areas identified in a local Development Plan Document where there is a shortage of lower-cost space or workspace of particular types, uses or sizes, should:

- 1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or
- 2) ensure that an equivalent amount of B Use Class business space is re-provided in the proposal which is appropriate in terms of type, use and size, incorporating existing businesses where possible, and include affordable workspace where appropriate.

Policy E7 of the London Plan (2021) Part C states - Mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:

- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
- 2) it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or

3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification. Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Part D below.

Policy E7 of the London Plan (2021) Part D states - The processes set out in Parts B and C above must ensure that:

- 1) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
- 2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
- 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 above with particular consideration given to:
  - a) safety and security
  - b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
  - c) design quality, public realm, visual impact and amenity for residents
  - d) agent of change principles
  - e) vibration and noise
  - f) air quality, including dust, odour and emissions and potential contamination.

Policy S2 of the London Plan (2021) states -

- B) Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.
- C) New facilities should be easily accessible by public transport, cycling and walking.

Policy E2 of the Hillingdon Local Plan Part 1 (2012) states - during the plan period, most of the employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations (SILs), Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge Town Centre and Hayes Town Centre with a particular focus around transport nodes.

Policy DMCI 2 of the Hillingdon Local Plan Part 2 (2020) states - Proposals for the provision of new community facilities will be supported where they :

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

Policy DME 2 of the Hillingdon Local Plan Part 2 states - Proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:

- i) the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
- ii) the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
- iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or

- iv) The new use will not adversely affect the functioning of any adjoining employment land; or
- v) The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.

Policy DME 3 of the Hillingdon Local Plan Part 2 states - B) Proposals involving loss of office floorspace in preferred locations for office growth, which fall outside of existing permitted development procedures, should include information to demonstrate that: i) the site has been actively marketed for two years; ii) the site is no longer viable for office use, taking account of the potential for internal and external refurbishment; and iii) surrounding employment uses will not be undermined.

Policy DMH 8 of the Hillingdon Local Plan Part 2 states - The development of residential care homes and other types of supported housing will be permitted provided that:

- i) it would not lead to an over concentration of similar uses detrimental to residential character or amenity and complies with Policy DMH 4: Residential Conversions;
- ii) it caters for need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;
- iii) the accommodation is fully integrated into the residential surroundings; and
- iv) in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.

This pre-application enquiry follows the recent refusal of planning permission under ref: 79073/APP/2024/2627 for the change of use of part of ground floor from Office (Class E) to flexible uses within Class E and / or C2 for residential training centre for dialysis patients, meeting spaces for commercial teams and associated training. This application was refused for the following reason:

1 The applicant has not submitted supporting evidence or justification to warrant the loss of the existing Class E use and to support the change of use to a proposed Class C2/ Sui Generis use in an out of town, preferred office growth location, Therefore, the principle of development is unacceptable as it is contrary to Policy E2 of Hillingdon Council's Local Plan Part 1: Strategic Policies (2012), and Policies DMCI 2, DME 2, DME 3 and DMH 8 of Hillingdon Council's Local Plan Part 2: Development Management Policies (2020), Policies E2, E7, and S2 of the London Plan (2021) and the National Planning Policy Framework (2023).

During the meeting, it was clarified that the proposed use did not comprise a residential care establishment under Use Class C2 and rather the proposal comprises a healthcare training facility alongside an office function. Taken as a whole, the scheme would be considered to be a sui generis proposal.

The overnight accommodation is required as training is provided on a three day course and the building accessed by patients would be furnished similar to home surroundings to provide a suitable environment.

Additional information was provided by the agent and applicant team regarding the site benefits which include soundproofing, proximity to Heathrow and ease of connection to Nordic countries. It was presented that Vantive provides training services by hospital referral to dialysis patients. It was also clarified that patients would first be passed medically fit to be able to travel on their own and can treat themselves. Training is also provided to healthcare professionals to use machinery.

It is understood the applicant, Vantive has aspiration to move their headquarters to the site, which is seen as a positive to bring a long-term use into the currently vacant unit. Whilst there is a policy departure, there is a clear parallel between the existing use of the site as offices and part of the proposal which is essential an office use, there is scope for support of the proposal. The proposed healthcare training element would be a public benefit and could be supported. Further expansion on the point which was made regarding the principle of teaching patients, carers or other healthcare professionals to deliver this type of treatment would arguably reduce the requirement for dialysis to be delivered in hospitals where it is clear there are significant pressures and capacity issues. This point should be elaborated on in any future submission if confirmed.

Any future planning application should be accompanied by a comprehensive planning statement that provides details of any other discounted sites and demonstrate why the application site is the most suitable for the proposed use. It is understood from the meeting that the site offers logistical advantages for operational/servicing requirements.

As discussed, more detailed information regarding the marketing exercise would be provided to demonstrate a lack of demand for the office space. There appears to be positive employment benefits associated with the proposal. It was mentioned that 200 staff would be visiting periodically, however the number of staff and visitors visiting the site on a daily basis was not disclosed. It would be useful if estimated numbers (of staff, practitioners, cleaners, visitors, patients) and their daily comings and goings were set out in more detail in any future submission.

## Design

### CHARACTER AND APPEARANCE OF THE AREA:

Policy D3 of the London Plan (2021) requires that development proposals should: Form and 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.

Policy BE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012) seeks a quality of design in all new development that enhances and contributes to the area in terms of form, scale and materials; is appropriate to the identity and context of the townscape; and would improve the quality of the public realm and respect local character.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that new development will be required to be designed to the highest standards and incorporate principles of good design.

Policy DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development should be well integrated with the surrounding area.

Other than the ramped access, there are no exterior changes being proposed to the existing building. Therefore there are no envisaged impacts on the character and appearance of the area.

## Amenity

### NEIGHBOURING RESIDENTIAL AMENITY:

Policy D3 of the London Plan (2021) states Part D7) that development proposals should deliver appropriate outlook, privacy and amenity.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) seeks to ensure that development proposals do not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. The supporting text for this policy states that the Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook.

The proposed use is unlikely to generate any significant level of noise. It is also noted that the building is soundproofed and further sound insulation is planned for the internal fabric of the building where patients would be utilising. As such there are no envisaged impacts on neighbouring residential amenity.

#### Highways

##### HIGHWAY SAFETY AND PARKING:

Policy T2 Part A of the London Plan (2021) states - Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

Policy T6 Part D of the London Plan (2021) states - The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Policy DMT 5 Part A of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states - Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network. Policy DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) seeks to ensure that all development is in accordance with the car parking standards set out in Appendix C, Table 1 unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

The Highway Authority have been consulted and provide the following comments:

The applicant is seeking pre-app advice on the proposal which involves the change of use from vacant office to office/healthcare education/ training facility (Sui Generis).

The level of car parking should be in accordance with the London Plan 2021 Policy T6.2 Office Parking and for the healthcare education/training facility in accordance with The Hillingdon Local Plan: Part 2 Policy - DMT 6 the council's adopted car and cycle parking standards including disabled bays and layout with EV charge point.

Any departing from the standards would need the applicant to robustly demonstrate the proposal will not result in a deleterious impact on the surrounding road networks operation and safety including parking demand/stress.

The application site has a PTAL ranking of 1b indicating access to public transport is very poor and that occupiers and visitors of the proposed dwelling would be largely reliant on private car travel contrary to National Planning Policy Framework (NPPF) 9: Promoting Sustainable Transport and The Mayor's Transport Strategy which aims to encourage people to walk, cycle and travel by public

transport. Notwithstanding the HA acknowledges that withing a short distance the PTAL rating rises to 3 meaning it has good access to public transport.

The Highway Authority would require any forthcoming planning application to be accompanied by a Transport Statement. The Transport Statement should generally include an audit and appraisal of existing site information, baseline traffic data, details of the development including proposed means of access, person trip generation and distribution of trips by mode of transport, measure proposed to encourage and enable active and sustainable travel, proposed parking and servicing strategy, residual vehicle trip impact and details of the sites current use or an extant planning permission and the net level of change in traffic flows that might arise from the development.

The Highway Authority would use this Transport Statement to determine the suitability of the number of car parking spaces proposed and a separate assessment for trip generation by the proposed use.

The Highway Authority requires that the dimensions of parking spaces and cycle bays and refuse collection and storage points etc should be shown and annotated on the deposited plans.

**Recommendation:**

In view of the proposals and site specific highway conditions, the HA in principle would have no objection.

Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

**Other**

**ACCESS:**

Policy D5 of the London Plan (2021) sets out that proposals should achieve the highest standards of accessible and inclusive design.

The Access officer was consulted on the previous planning application and did not raise an objection subject to a condition to secure details of access to building entrances to meet the needs of people with disabilities. This should be factored into any future planning application in the form of a detailed section drawing showing level access.

**Planning Obligation and CIL (Mayor and LBH)**

Not applicable.

**Application Submission**

The Council has an adopted Local Planning Validation Checklist (June 2020) that sets out in full the drawings and documents required to support applications for planning permission.

**Conclusion**

Following the meeting, various matters have been clarified regarding the proposal. It is recommended that the matters discussed during the meeting are set out on paper to demonstrate the benefits associated with the proposal and to address the reasons for refusal of the recent planning application and the issues raised during this pre-application enquiry.

Timescales for a resubmission application were noted and it is suggested that entering into a PPA would be beneficial for the applicant team as this would allow the LPA to allocate additional

resources to ensure any future application is determined promptly.

It is recommended that the documentation submitted with any future application should be as thorough as it can be, as requests for additional information during the course of the application may result in delays in determination which can be avoided with the submission of relevant statements and detailed drawings early on in the application process.

Overall, despite the policy departure and the previous reasons for refusal, following on from the informative pre-application discussion, the proposal does have positive merits, which have been noted and subject to further detail, a future planning application that overcomes the reasons for refusal with the submission of detailed information and drawings, could be supported.

**Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.**

#### Follow Up Pre-application Meeting

Thank you for entering into the Council's pre-application advice service and I trust you have found this service of assistance.

**Christos Chrysanthou  
Planning Officer  
London Borough of Hillingdon**

#### Planning Guarantee

For complex applications which are likely to exceed the statutory time frames, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all planning performance agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

**Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.**