



**CONSTRUCTION OF
TWO ADDITIONAL STOREYS
TO EXISTING
OFFICE BUILDING**

**BROOK HOUSE
54A COWLEY MILL ROAD
UXBRIDGE
UB8 2QE**

**PLANNING STATEMENT
MAY 2026**

Introduction

1. This statement has been prepared to accompany a full planning application for the construction of two additional storeys to the existing two-storey office building at Brook House, 54a Cowley Mill Road, Uxbridge UB8 2QE. The application is submitted on behalf of Ranola Properties Ltd, the landowners.
2. The application comprises:
 - (1) Planning Application Form and Ownership Certificate
 - (2) Application Drawings prepared by JPB John Broderick Architects:
 - 10401-100-P3 – Location Plan (1:1000@A3)
 - 10401-151-E – Existing Block Plan and Parking Layout (1:200@A3)
 - 10401-251-F – Proposed Block Plan and Parking Layout (1:200@A3)
 - 10401-705-P3 – Existing Ground and First Floor Plans (1:100@A1)
 - 10401-710-P2 – Existing Elevations (1:100@A1)
 - 10401-815-P7 – Proposed Ground and First Floor Plans (1:100@A1)
 - 10401-816-P6 – Proposed Second and Third Floor Plans (1:100@A1)
 - 10401-817-P6 – Proposed Roof Plan (1:1000@A1)
 - 10401-820-P7 – Proposed Elevations (1:100@A1)
 - 10401-821-P3 – Proposed Section (1:100@A2)
 - (3) Transport Statement prepared by Paul Dickinson & Associates, Town Planning and Development Consultants, April 2026
 - (4) Ecological Appraisal rev B prepared by FPCR Environment & Design Ltd, 10 December 2025
 - (5) Statutory Biodiversity Metric prepared by FPCR Environment & Design Ltd, 9 December 2025 (Excel spreadsheet submitted separately)
 - (6) Planting Plan – Drawing 12335-FPCR-ZZ-ZZ-DR-L-0007 P02 prepared by FPCR Environment & Design Ltd, 14 April 2026
 - (7) Urban Greening Factor Plan – Drawing 12335-FPCR-ZZ-ZZ-DR-L-0005 P05 prepared by FPCR Environment & Design Ltd, 14 April 2026

- (8) Energy Statement E1530-ES-00 prepared by Doherty Energy, 5 September 2025
- (9) Flood Risk Assessment 342-FRA-v.1 prepared by RIDA Reports Ltd, September 2025
- (10) Air Quality Assessment 92340 rev C prepared by Aval Consulting Group, 22 February 2024
- (11) Fire Statement by RSCP Engineering & Consultancy, 28 May 2026

Description of Development

- 3. Brook House is a two-storey office building which provides serviced offices to a range of small and medium sized local businesses. The use of Brook House for offices was confirmed by a Lawful Development Certificate 48338/A/93/1455 granted in October 1993.
- 4. Planning permission 48338/APP/2007/198 for an additional storey was approved by the Council on 18 April 2007 but never implemented. Since then, higher density and taller developments have been constructed on the opposite side of Cowley Mill Road. This is considered in the 'character of area' section below.
- 5. The proposal seeks to provide additional floorspace as part of an overall upgrading of the existing building. The proposal is to construct two additional storeys with the top storey (third floor) set back with a reduced floor plate.
- 6. The existing building comprises 1847m² GIA over two floors. The proposals would create a net gain of 1645m² GIA additional office floorspace over the two new floors. The proposals include a reconfigured layout to provide a total of 70 no. parking spaces for the existing and proposed office floorspace to comply with London Plan standards, including 3 no. spaces for disabled persons and 8 no. electric vehicle charging points, the introduction of 24 no. long term cycle spaces for staff and 7 no. short term cycle spaces for visitors, and additional waste/recycling bin storage capacity.

7. The proposals include a general refurbishment of the building. This will involve replacing the existing external metal cladding system, which has a rather dated and tired appearance, with new brick and glazed elevations. The proposed brick colour would be a mixture of red and cream brick to match the existing commercial buildings on the adjoining Brook Business Centre, which is also owned by the same applicants (see area edged blue on the location plan submitted with the application). The refurbishment of the building would also include a new front canopy feature.

The principle of development

8. The proposals involve the creation of additional office floorspace on existing commercial/employment land. This accords with a number of policy objectives which generally support office growth:
- (1) London Plan Policy GG2 (Making the best use of land) encourages the development of brownfield land and the intensification of use of land to support additional workspaces and promoting higher density development particularly in areas that are well-connected to jobs, services, infrastructure and amenities. The proposals involve the development of brownfield land (PDL as defined by Annex 2 Glossary to the Framework) and the intensification of suitable land.
 - (2) London Plan Policy E1 (Offices) states that improvements to the quality, flexibility and adaptability of office space involving new office provision, refurbishment and mixed- use development should be supported. Sub para. B supports increases in the current stock of offices in the locations in sub paras. C and D to the policy. Sub para. D states that new office development should be consolidated and where viable extended focussing new developments in town centres and other existing office clusters including existing urban business parks, taking steps towards greater transport sustainability of these locations. The proposals involve additional office floorspace (and the refurbishment and upgrading of the existing office floorspace) within an existing office cluster on an existing business park. It would result in improvements to

the quality, flexibility and adaptability of office space. These are serviced offices which by their nature offer a range of office suite sizes and flexibility/adaptability to meet different needs and would be particularly attractive and suited to small and medium sized businesses and start-up companies (of the type which are specifically supported and encouraged under LPP1 Policy E6).

- (3) The site lies within a designated Strategic Industrial Location (SIL). London Plan Policy E5 states that SILs should be sustained as the major locations for industrial, logistics and related capacity for uses that support the functioning of London's economy. LPP2 Policy DME1 states the Council will support employment proposals in SILs in accordance with the relevant London Plan policies. In this case it has to be acknowledged that the existing building is in lawful office use rather than industrial/logistics use. The proposed floorspace will provide additional capacity for commercial uses that support the functioning of London's economy and therefore supports the Policy E5 objectives. The proposal would not involve any loss of industrial or logistics uses. Nor would it prejudice any potential future industrial or logistics provision as it would not be practical for industrial or logistics space as it involves additional floorspace on second and third floors above existing offices.
- (4) National policy at paragraph 85 to the Framework requires that significant weight must be given to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
9. The proposals therefore comply with Policies GG2, E1, E5, E6 and DME1 and national policy in the Framework. The proposals would result in the refurbishment and upgrading of existing office floorspace and increased office provision on existing employment land. The additional provision would offer a range of office suite sizes and flexibility/adaptability to meet different needs and would be particularly attractive and suited to SMEs and start-up businesses and therefore would support the Council's employment policy objectives.

Character of the area

10. The proposal would add two storeys to the existing two-storey building resulting in a four-storey building (with the top floor set back on all four sides) and replace the existing metal cladding facades with new brick and glazed elevations similar in appearance to the adjacent Brook Business Centre buildings to the west.
11. The proposed scale and appearance of the enlarged building are considered appropriate and in keeping the character of the area. The site is not within a designated conservation area and there are no neighbouring listed buildings.
12. The character of the area approaching the Cowley Mill Road/St Johns Road junction is higher density with taller buildings. The nearest adjacent building on the Brook Business Centre to the west is a three-storey commercial building with a pitched roof. I noted above that planning permission 48338/APP/2007/198 for an additional storey to Brook House was granted in April 2007 but not implemented. Since then, higher density and taller buildings have been constructed on the opposite side of Cowley Mill Road from Brook House (see photo below). This is highly material to the determination of this application.



Brook House and new flats on opposite side of Cowley Mill Road

13. Planning permission 188/APP/2008/3309 for the redevelopment of the former Dagenham Motors site opposite Brook House to provide a residential development of 4 x 4 storey blocks (41 flats) was allowed on appeal and granted in November 2009. The single issue considered at the appeal was the effect of the 4-storey development on the character and appearance of the surrounding area. The Inspector concluded that whilst the proposed four storeys would replace one and two storey buildings and be larger than the predominantly 2 storey housing to the east, the design and layout would lead to an efficient use of land without compromising the quality of the environment and was therefore acceptable. He concluded it would have a positive effect on the character and appearance of the area and would respect local context and character. He also noted that the commercial buildings on the opposite side of the road (which would include Brook House) were set back behind mature planting so made a more limited contribution to the street scene.
14. The proposals would enhance the mature screening to the front and side boundaries and generous spacing around the building. These landscaping enhancements are required to satisfy the mandatory BNG requirement an urban green factor policy requirement. However, they also offer visual enhancements of the site when viewed within the street scene.
15. The existing building has grey cladding panels with red banding around the top and white powder coated windows. It does not reflect the buildings on the adjacent Brook Business Centre which have a higher quality finish of contrasting red and cream colour bricks (red to lower floors and around window cills and headers). The proposal would replace the cladding, which is rather outdated and in poor condition, with new brickwork and curtain walling with glazing panels and a new entrance feature with canopy on the front elevation.
16. The proposal is an attractive design and would utilise high quality materials. This would both respect the local context and enhance the character and appearance of the area and therefore would comply with local plan policies LPP1 BE1 (Built environment) and LPP2 DMHB11 (Design of new development) and national policy in the Framework.

Parking and servicing arrangements

17. London Plan Policy T6.2 (Office Parking) and Table 10.4 (Maximum office parking standards) set maximum office parking standards. In Outer London boroughs the maximum standard is up to 1 space per 100m² GIA (or 1 space per 50m² GIA in Outer London locations identified through a DPD where more generous standards apply but the current DPD pre-dates the more recent London Plan).
18. Paragraph 10.5.16 to the London Plan notes that the provision of office parking has the potential to induce habitual car travel even where alternatives to the car exist and thereby impacting on the Mayor's target for 80% of trips to be made by public transport and active travel. For these reasons the London Plan seeks to keep car parking provision to a minimum. Applying these standards the existing and proposed office floorspace (combined total of 3493m²) would require 35 spaces.
19. It is acknowledged that it would be unreasonable and impractical to limit occupants of the existing offices who use the current parking provision to the same extent as future occupants of the proposed new floorspace.
20. A parking survey undertaken in October 2025 and daily experience of the level of use (JPB Architects, the scheme architects, are based in Brook House) shows the existing 79 spaces in the car park is significantly underused. The following photographs were taken during the 06/10/2025 parking survey:









21. A weekly parking count survey (undertaken in mid-morning as the typical peak time and outside periods of school holidays or public holidays) showed the following:

Date	Occupied Spaces	Available Spaces	% Availability
Mon 06/10/2025	48	31	39%
Tue 07/10/2025	46	33	51%
Wed 08/10/2025	43	36	47%
Thurs 09/10/2025	37	42	54%
Fri 10/10/2025	32	47	58%
Average	41	38	52%

22. The average occupancy rate for the serviced offices on the site is around 85%. This is in line with an average occupancy rate for serviced offices across London of about 84% (Source: Instant Group Research, March 2024). Even if the surveyed parking numbers are pro-rated up to assume full occupancy (which rarely happens given the nature of serviced offices) this suggests a maximum existing parking demand of around 55 spaces (assuming maximum surveyed demand of 47 spaces and 85% occupancy). Applying the restrictive London Plan standards to the proposed new floorspace of 1638m² requires a maximum of 16 additional spaces. This gives a combined maximum requirement of 71 spaces. The proposals provide 70 parking spaces.
23. There are currently no properly laid out disabled spaces or electric vehicle charging points (EVCPs) in the existing car park. The proposal includes 3 no. disabled spaces and 8 no. EV charging points.
24. London Plan Policy T5 (Cycling) and Table 10.2 (Minimum cycle parking standards) indicate that cycle parking should be provided at a minimum standard of 1 space per 150m² GEA for long-stay (employees) and 1 space per 500m² for short stay (visitors). There is currently no dedicated cycle parking serving Brook House. Applying the standards to the combined total of 3493m² existing and new floorspace would require 24 long stay spaces and 7 short stay spaces. The proposed layout includes covered and secure provision for 24 long stay spaces and provision for 7 short stay cycles near the front entrance to comply with the London Plan standards.
25. The site is less than 100 metres from bus stops in St Johns Road (First Bus Service 3 Slough – Langley – Iver – Cowley – Uxbridge – 2 buses every hour weekdays and hourly at weekends) and about 500 m from bus stops on Cowley Road (Chiltern View PH stop, LT Routes 222 and U5). Uxbridge Underground Station and Uxbridge centre are about 1500 metres or 15 minutes' walk to the northeast.
26. The proposal therefore provides a reduced parking provision in accordance with London Plan policy objectives but new and enhanced provision for both electric vehicles and cycle parking which fully complies with the London Plan cycle

standards. This approach to reducing car demand and encouraging non-car modes of travel complies with London Plan Policy E1 (Offices) which supports new office provision and refurbishment by focussing new developments in existing office clusters including existing urban business parks and taking steps towards greater transport sustainability of these locations.

Biodiversity net gain and urban greening factor

27. An ecological assessment (including a BNG assessment) and Statutory Biodiversity Metric prepared by FPCR Environment & Design is submitted with the application. This assesses that given the limited scale and nature of the proposed development it would not result in any harm to designated sites of nature conservation interest including three SINC's identified within 1km of the site. The site is dominated by hardstanding and buildings with very limited areas of modified grassland, introduced shrub, vegetation and trees. The main building, shed and storage container on the site were assessed for their potential to support roosting bats and all were found to be negligible. The site supports very limited suitability for nesting birds and for foraging/sheltering hedgehogs. No other protected species were identified or considered as likely presence on the site given the small size, limited extent of habitat and its isolation.
28. Mitigation measures are recommended during the construction period. The proposals include habitat creation such as green roofs, introduced shrub and native hedgerow as well as enhancement measures such as bird and bat boxes. The BNG assessment demonstrates that the proposals will result in an on-site 91.62% net gain in biodiversity units which is significantly in excess of the mandatory 10% BNG requirement and weighs heavily in support of the proposals.
29. An Urban Greening Factor Plan prepared by FPCR Environment & Design is submitted with the application. This demonstrates how the habitat creation measures incorporating green roofs, introduced shrub and native hedgerow will achieve an urban greening factor of 0.31 and therefore meets the London Plan Policy G5 target of 0.30 for commercial developments.

Sustainability and energy

30. An Energy Statement prepared by Doherty Energy is submitted with the application. This explains that the development has been assessed against the criteria of achieving zero carbon in accordance with latest London Plan policies – a 100% reduction in CO2 emission beyond minimum compliance with Part L of the Building Regulations together with a 15% reduction resulting from the use of energy efficiency measures only. The resultant calculations have been carried out using the latest SAP 10.2 emission factors and following the London Plan energy hierarchy.
31. The Energy Statement demonstrates that the proposed development can achieve zero carbon by the use of air source heat pumps and a photovoltaic system, with a minimum output of 36.4 kWp. Based on 400 kWp panels, this would equate to 91 no. panels and require an area of around 180-200m² as shown on the submitted roof plan. The Statement demonstrates savings of 16.91% through 'be lean' and 83.82% through 'be green' resulting in total on-site savings of 100.74%. Thus there is no carbon shortfall and no cash in-lieu contribution required.
32. The new GLA 2021 Energy Assessment Methodology now requires that the carbon reporting spreadsheet to be submitted, which are submitted with the application.
33. On this basis the proposals comply with London Plan Policy SI 2, LPP1 Policy EM1 and LPP2 Policy DME1 2.

Flood risk

34. The application site is less than 1ha and the whole of the site lies within flood zone 1 (lowest risk of flooding). The EA maps show the flood risk from surface water is very low. The site is not within identified within a critical drainage area. The proposal involves two additional storeys and no change to the building footprint and thus there would be no material change in impermeable area that would affect flood risk or surface water drainage.

Air Quality

35. An air quality assessment prepared by Aval Consulting Group is submitted with the application. This assesses the local air quality effects of the proposed development using the latest planning guidance from Environmental Protection UK, IAQM and DEFRA. A construction dust risk assessment has been undertaken to consider the potential risk from dust generating activities during the construction phase of the development in accordance with the latest IAQM guidance.
36. Based on local monitoring data and the DEFRA predicted background pollutant concentration, the proposed development site location is considered suitable for commercial development. The Statement sets out mitigation measures in accordance with the IAQM guidance for construction dust to reduce the potential impacts during the construction phase. No specific mitigation measures are considered necessary during the operational phase.

Fire safety

37. A Fire Statement (28 May 2026) prepared by RSCP Engineering and Consultancy Ltd is submitted with the application. This reviews the proposed development against the criteria in London Plan Policy D12. The application is not over 18 metres or 7 storeys tall and does not include residential use and therefore does not trigger the full fire safety strategy requirement.
38. The Fire Statement sets out a means of warning and escape, measures to support evacuation, internal fire spread and compartmentation, External fire spread planning stage conclusions and limitations together with required site information on the proposed development.
39. The report demonstrates that fire safety has been considered as a fundamental aspect of the proposed design during the planning stage and has influenced the design accordingly. Detailed compliance with building regulations and the technical fire strategy requirements can be addressed at the next design phase. The development accords with London Plan Policy D12.

Conclusion

40. The proposal constitutes sustainable development which provides a series of benefits in support of the three overarching objectives at paragraph 8 to the Framework:
- (a) economic benefits – by making an important contribution to the supply of office floorspace to support economic growth in the Borough and partly redressing loss of offices as a consequence of permitted development rights for changes of use and changes to use classes in recent years,
 - (b) social benefits – by supporting the provision of local jobs to support the community, and
 - (c) environmental benefits – without any harm to the natural, built and historic environment, including proposed elevational changes which will enhance the character and appearance of the environment and by encouraging non-car modes of travel for both existing and future occupants.
41. The proposal therefore comprises sustainable development which would provide additional employment floorspace to support economic growth on existing employment land and premises without any identified harm and would comply with relevant national policy and local plan policies.

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29 May 2026