



FEBRUARY
2024

3 The Square, Stockley Park, Uxbridge, UB11 1ET

Planning Statement

Iceni Projects Limited on behalf of
F&C Commercial Property Holdings c/o
Columbia Threadneedle Real Estate
February 2024

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ON BEHALF OF
F&C COMMERCIAL
PROPERTY HOLDINGS C/O
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PLANNING STATEMENT

CONTENTS

1.	INTRODUCTION	1
2.	THE APPLICATION SITE AND BACKGROUND	4
3.	MARKET TRENDS IN OFFICE SPACE	11
4.	PROPOSED DEVELOPMENT	13
5.	PLANNING POLICY	17
6.	PLANNING ASSESSMENT OF THE PROPOSALS	26
7.	SUSTAINABLE DEVELOPMENT	40
8.	PLANNING BALANCE AND CONCLUSION	42

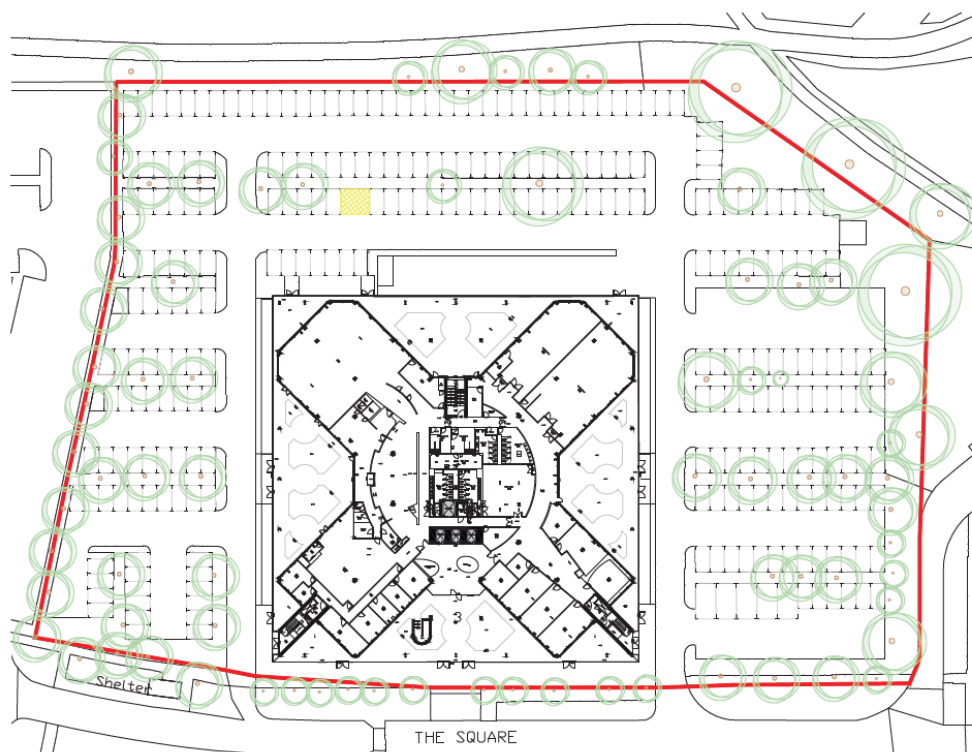
1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Iceni Projects ('Iceni') on behalf of F&C Commercial Property Holdings c/o Columbia Threadneedle Real Estate, in support of a planning application at 3 The Square, Stockley Park, Uxbridge, UB11 1ET.
- 1.2 The description of the development is the following:

Full planning permission for the change of use of existing office building (Use Class E, formerly Use Class B1) to a post-operative care facility (Use Class C2) and external works to the building, landscaping, parking, and all associated works.

- 1.3 The site is located to the west of Hayes town centre and within the southern part of the London Borough of Hillingdon (LBH) and is accessed directly off The Square in the Stockley Park business park.

Figure 1.1 Site Location



- 1.4 This Planning Statement sets out the relevant planning background to the proposal, presents the application scheme and demonstrates how the planning matters associated with the development have been addressed and how they comply with the planning portal at local, regional, and national level.

- 1.5 The scheme will provide a post-operative medical care facility through the change of use of vacant office building within a sustainable location. It will secure the long-term use of a building at the Stockley Park business park and provide economic, social, and environmental benefits to the local area. Faced with increasing vacancy rates and changing office space requirements, Stockley Park is currently at a key milestone in determining its future viability and flexibility for alternative uses.
- 1.6 The scheme will also enhance the setting of the adjoining Registered Park and Garden through the provision of a new landscaped garden and achieve significant benefits from Biodiversity Net Gain (BNG).

Submission Documents

- 1.7 The following documents and drawings have been prepared and submitted in support of this planning application:

Table 1.1 Submission Documents

Technical Assessment / Statement	Author
Application and CIL forms	Iceni Projects
Planning Statement	Iceni Projects
Design and Access Statement	Hale
Design Plans (including location plan, existing & proposed floor plans and elevations)	Hale
Landscaping Strategy and Urban Green Factor Assessment	Iceni Projects
Application Summary Document	Iceni Projects
Air Quality Assessment	Hoare Lea
Preliminary Ecological Assessment	Greenspace Ecological Solutions
BNG Report	Greenspace Ecological Solutions
Arboricultural Report	Greenspace Ecological Solutions
Heritage Statement	Iceni Projects
Noise Assessment	Hoare Lea
Energy and Sustainability Statement	Iceni Projects
Circular Economy Statement	Iceni Projects
Whole Life Carbon Assessment	Iceni Projects
Operational Waste Management Strategy	Iceni Projects
Site Waste Management Plan	Iceni Projects
Transport Assessment	Iceni Projects
Travel Plan	Iceni Projects
Car Parking Management Plan	Iceni Projects

Construction and Logistics Plan	Iceni Projects
Service and Delivery Plan	Iceni Projects
Flood Risk Assessment and Surface Water Drainage Strategy	Aegaea
Fire Statement	Bespoke Fire Solutions
Office Market Report	Cushman & Wakefield
Viability Assessment	Cushman & Wakefield
Economic Benefit Assessment	Iceni Projects
Property Market Evidence	Iceni Projects

Planning Statement Structure

1.8 This Planning Statement is structured as follows:

- **Section 2.0** outlines the relevant background information for the site and surrounding area;
- **Section 3.0** details the condition of 3 The Square and the market trends in London office space;
- **Section 4.0** describes the application proposals;
- **Section 5.0** provides a synopsis of the relevant adopted and emerging planning policies;
- **Section 6.0** demonstrates why the principle of development should be acceptable;
- **Section 7.0** outlines the benefits of the proposed sustainable development; and
- **Section 8.0** concludes all the previous sections of the planning statement.

2. THE APPLICATION SITE AND BACKGROUND

The Site

- 2.1 The site is located within the Hayes Town Ward of the LBH, who are the determining local planning authority for the application. As a GLA referable scheme, this application will also be assessed by the GLA.
- 2.2 The site sits within a wider business park known as 'Stockley Park'. The red line site area which forms the basis of this application is 1.37 ha and comprises of 3 The Square office building containing 92,000 sq ft of floorspace- surrounded by a landscaped car park, trees, and planting.
- 2.3 Stockley Park consists of a Phase I and II, with the site being situated in Phase II Stockley Park and is managed by Stockley Park Estates Company Ltd.
- 2.4 The site has been vacant for some years since its previous occupier moved into a nearby office building on the business estate, with there being no prospect of a future occupier.

Surrounding Area

- 2.5 Phases I and II Stockley Park were built between 1984 and 1993 as part of a business estate masterplan which contains five office buildings in a landscaped area, intended to be desirable for suburban commuters.
- 2.6 Stockley Park Golf Club is located to the north of the site and Phase I being located to the west of the site.
- 2.7 Phase II Stockley Park's southern boundary runs along the Grand Union Canal and associated public footpath, with south of the canal being a large industrial and logistics estate. Lastly, to the east of the site is Lake Farm Country Park, with the residential area of Hayes Town just beyond this.

Planning Designations

- 2.8 The site is in Flood Zone 1, meaning it has the lowest probability of flooding from rivers and the sea. Further to this, the surrounding Stockley Park land is also Flood Zone 1.
- 2.9 There are no Statutory or Locally Listed buildings near to the site. This acknowledged, Stockley Park was designated a Grade II Listed Park and Garden, which includes the landscaping currently on the site. This occurred in August 2020 due to recognition for the high-quality amenity space for staff to

enjoy which has won a range of recent accolades including Green Flag Award; Green Apple Environment Award; a Greener Path Award; and gold in the London in Bloom event.

- 2.10 Further to this, the site is adjacent to Metropolitan Green Belt designation, which contains the Stockley Park Golf Club to the north of the site.
- 2.11 While there are no public rights of way within the site, there are public footpaths along the southern site edge due to a bus stop being situated on The Square, as well as amenities being present in the Stockley Park Business Park.
- 2.12 Lastly, the site falls within Hillingdon's Air Quality Management Area (AQMA), which covers the southern half of the borough.

Sustainability

- 2.13 The surrounding wider area context is characterised by its proximity to Heathrow Airport, suburban dwellings, as well as clusters of business, industrial, and retail parks. This wider context has ensured that there has been long-term transport infrastructure investment in the area, allowing for accessible high-quality, sustainable transport methods being situated near to the site.
- 2.14 The site is very well connected to London's wider public transport network, being a 10-minute bus from Hayes & Harlington Tube and Rail Station. Alternatively, it is a 22-minute walk or 7-minute cycle via Grand Union Canal Walk from the site to the station. From here, it is approx. an 18-minute tube to Paddington Station or a 5-minute tube to Heathrow Airport on the Elizabeth Line.
- 2.15 The site has a PTAL of 1a-2, on a scale of 0-6b, where 6b is the best public transport accessibility level. This acknowledged, there is a shuttle bus service that runs from Hayes Harlington station and Stockley Park, which would not have been accounted for since it is operated by Stockley Park. This connects the site to locations such as Hays and Harlington which have PTAL scores reaching as high as 5. Further to this, Stockley Park runs a 'borrow-bike' scheme for its occupiers, allowing convenient and sustainable transport within the immediate park area.
- 2.16 Many local services and facilities can be reached by foot in less than 15 minutes of the site, including:
- A range of street food vendors within Stockley Park;
 - outdoor sports equipment such as table tennis tables;
 - the Set Coffee Shop;
 - the Woolpack Pub;

- Costa Coffee;
- Subway;
- Greggs;
- Nuffield Health Gym;
- Stockley Park Golf Park; and
- Travelodge.

2.17 The range of nearby services and facilities to site ensure that visitors to Stockley Park are catered for, with multiple food options and gyms and hotels. These points indicate that the site is sustainably located, with easily accessible public transport routes connecting it to the surrounding area and London's wider transport network, as well as its proximity to multiple services and facilities.

Planning History

2.18 3 The Square has the following planning history:

Table 2.1 Planning History

Application Reference	Proposal	Decision
57328/APP/2002/1179	Enlargement of existing refuse store and the installation of a smokers' shelter, including an enhanced security system, 1.2 metre high 'red wall' posts, renewal of automatic barriers, and the installation of two bollards to basement car park.	29-07-02 - Approval

2.19 There has been a range of applications made at Stockley Park which relate to developing and/or refurbishing existing office that are relevant considerations. These include the following:

Table 2.2 Surrounding Applications

Application Reference	Address	Submitted	Proposal	Decision
37203/APP/2023/3422	7 Roundwood Avenue, Stockley Park, UB11 1AX	Received: 27/11/2023 Validated: 27/11/2023	Erection of external terraced decking to consist of composite decking boards, double glazed panels and a reinforced glazed	Undecided

			balustrade, and amendments to fenestrations.	
37800/APP/2 023/2412	The Arena, Bennetsfield Road, Stockley Park, UB11 1AA	Received: 11/08/2023 Validated: 30/08/2023	Change of use of ground floor drinking establishment (Sui Generis) to restaurant (Use Class E(b)). Erection of a single storey side extension, entrance lobby and canopy. Replacement escape staircase, cladding to ground floor elevations, roof to rotunda and glazing with louvres to first floor plant room. Regularisation of car parking on site, and relocation of cycle store and bin store.	Undecided
37200/APP/2 023/2150	Waterview House, 1 Roundwood Avenue, Stockley Park	Received: 19/07/2023 Validated: 19/07/2023	Replacement glass panel and feature lighting to building entrance; Replacement cladding to building frontage, installation of bicycle store for 20 cycles, 3 new EV chargers in the car park and retrospective permission for 4 existing EV chargers in the car park.	Approved: 13/09/2023
37201/APP/2 023/723	3 Roundwood Avenue, Stockley Park.	Received: 10/03/2023 Validated: 13/03/2023	Erection of two single storey front extensions, erection of a cycle storage structure, erection of electric vehicle charging units and associated landscaping	Approval: 03/06/2023
37800/APP/2 021/2189	The Arena, Bennetsfield Road, Stockley Park, UB11 1AA	Received: 01/06/2021 Validated: 01/06/2021	Change of use from office (Use Class B1(a)) to residential (Use Class C3) to provide 12 residential units (Prior Approval).	Approval: 30/07/2021
39207/APP/2 021/3065	Former GSK Offices, Stockley Park	Received: 09/08/2021 Validated: 09/08/2021	Redevelopment of the site to provide a last mile delivery centre (Use Class B8) and ancillary offices together with associated van storage deck and parking, access arrangements, landscaping and infrastructure.	Withdrawn: 22/10/2021

2.20 In summary, it can be seen that there is a concerted effort by occupiers to ensure that their premises remain viable and occupied due to increasing issues of retaining office tenants.

Pre-Application Engagement

- 2.21 Two pre-application meetings were held with LBH to discuss the potential alternative uses for site and develop the proposals.

First Pre-application Meeting

- 2.22 The first pre-application meeting was held with LBH on 7th March 2023 in which two options were presented as alternative uses to the existing vacant office building. The first option was a healthcare facility, and the second option was a data centre.

- 2.23 The Council highlighted the site's policy designations, in particular it adjoins a Registered Park and Garden. The Council also acknowledged that they were aware of the ongoing vacancies at Stockley Park, however they were keen to progress work on their employment needs before considering further.

- 2.24 The data centre option raised a number of concerns including:

- Uncertainties over the power demands a data centre would have and whether local power infrastructure was capable of coping with this added demand;
- Concerns that a data centre could conflict with the Registered Park and Garden designation due to its harsh environment; and
- Reservations over the likely drop in footfall in Stockley park due to a decline in employment numbers.

- 2.25 The healthcare facility option was viewed more favourably due to the following:

- The employment numbers from a healthcare facility would be similar to that of an office;
- Healthcare facilities are needed in the area due to NHS capacity issues in the Hillingdon borough area;
- The appearance and design of a healthcare facility would suit the immediate area more, especially in relation to its Registered Parks and Garden designation.

Second Pre-application Meeting

- 2.26 The second pre-application meeting was held with LBH Council on 24th July 2023. Only the proposal for a post-operative healthcare facility had been taken forward and presented as part of the meeting.

2.27 The Council viewed the proposal positively, including in particular through retaining the existing building and enhancing the setting of the Registered Park & Garden with the provision of new landscaping.

2.28 The Council also noted that the proposal will need to be robust and have a clear submission to support it against policy requirements. It was also highlighted that proposals should identify any complimentary uses and why it would be an appropriate location for this health use.

Planning Performance Agreement

2.29 Following the pre-application meetings, a Planning Performance Agreement (PPA) was signed with LBH to agree a timetable to progress and determine a planning application and to have focused workshops covering the following matters:

- Loss of employment;
- Transport;
- Design and Heritage; and
- Energy and sustainability.

Loss of Employment

2.30 The meeting on loss of employment took place with LBH on 14th November 2023.

2.31 This meeting primarily covered the requirements for the evidence the site has been marketed to prove that all available options to occupy the office space has been taken. It was confirmed that since the last pre-application meeting, further buildings in Stockley Park are being marketed.

2.32 The Council note that there will be an employment land review as part of the emerging Local Plan, which is expected to be published in March 2024.

Transport

2.33 The meeting on transport took place with LBH on 10th November 2023.

2.34 The Council viewed the loss of car parking favourably, though asked for justification on why the loss was not greater. Further to this, the Council also asked for details on the pickup and drop-off facilities proposed due to the high expected demand from visitors and serving.

2.35 Active transport was a focus of the meeting, with an Active Travel Zone assessment being requested to identify how the S106 contributions could reduce barriers to pedestrians and cyclists in the area.

Additionally, the Council encouraged cycle provision to link up with existing Santander bike hire scheme which is expanding in the Hillingdon area- as well the improvements to better link Stockley Park and Grand Union Canal.

Design & Heritage

- 2.36 It was agreed that the approach the landscape strategy will need to take account of the highways and access arrangement to ensure there is no conflict. No material changes are being made to the façade aside from some refurbishment, which supports the retention of the current openness created by the building's materiality. Also, an arboricultural assessment was advised.

Energy and Sustainability

- 2.37 It was ultimately decided that the approach to energy and sustainability could be agreed via email rather than via a workshop.
- 2.38 The proposed Energy Strategy is based on the Energy Hierarchy on the basis that it is preferable to reduce carbon dioxide emissions through reduced energy consumption above decarbonisation through alternative energy sources.
- 2.39 Further, if the proposed Energy Strategy does not achieve the London Plan's zero-carbon target, then carbon offsetting will be required using the calculation of £95 per tonne over a 30-year period.

GLA Pre-application Meeting

- 2.40 Since the proposed scheme is GLA referable, a pre-application meeting was held on 1st December 2023 with the GLA and LBH.
- 2.41 The GLA note that Stockley Park is mentioned in the London Plan and therefore the scheme will need to be assessed against Policies E1 part D and S2 part C.
- 2.42 The GLA recommends that further detail on how the proposed scheme will free up NHS beds in the Hillingdon area as this will help justify the policy conflicts.
- 2.43 Heritage feedback noted that it was encouraged that Historic England were engaged given the Registered Park and Garden designation.
- 2.44 Transport feedback from Transport for London (TfL) at the meeting matched that of LBH, with a reduction in car parking spaces supported, however the remaining number will need to be justified.
- 2.45 In summary, the GLA was satisfied with the proposals subject to certain considerations.

3. MARKET TRENDS IN OFFICE SPACE

- 3.1 This section outlines key considerations in terms of the existing building at 3 The Square and its viability to be occupied by a new office tenant. This is also considered in the wider context of office market trends. More detail on this can be found as set out in the submitted Office Market Report, prepared by Icen Projects, and the Marketing Report, prepared by Cushman & Wakefield.
- 3.2 Canon moved into 3 The Square in 2003 and remained there for 19 years before signing a new lease with The Bower in Stockley Park in July 2021. Canon's lease formally expired in March 2022.
- 3.3 Following Canon's announcement that it intended to leave 3 The Square, marketing of the site commenced in 2020. Following unsuccessful marketing of the site, a consultant team engaged on finding alternative uses for the building in January 2023.
- 3.4 A report by Cushman Wakefield was completed January 2024, as well an Office Market Analysis was conducted by Icen Projects for the site in January 2024.

Condition of 3 The Square

- 3.5 The site has been occupied by Cannon between 2009 and 2021, with limited maintenance investment being directed towards futureproofing the building's mechanical and electrical (M&E) systems. This resulted in the existing M&E being in a condition which is not fit for purpose, and the cost to upgrade this to a level that would meet legislative and occupier requirements would outweigh the market demand for the quantum of space the building would provide.
- 3.6 Further to the M&E, the condition of the office floors has resulted in minimal occupier interest, with access to the core containing WCs and lifts being compromised. This has made it difficult to reconfigure the office space to suit multi-occupancy employment models despite the office floorspace requirements per occupiers continuing to reduce following trends of increasingly flexible working patterns.
- 3.7 The building's EPC rating of G is the lowest possible rating and is far below the national requirements of commercial properties having ratings of E or higher since 2023. This means that significant upgrades to the building's energy efficiency would be required and is a significant barrier to securing an occupier.
- 3.8 Cushman Wakefield provided economic feedback on the site stating that many occupiers place considerable weight on a perspective building's environmental credentials in the aim to support and meet their own ESG targets, with 65% of clients surveyed stating they would require a building which

has an EPC B at minimum- and 25% requiring an EPC A at minimum. This trend is seen throughout the South East market and is no longer limited to the traditional largescale corporate occupiers.

- 3.9 In summary, the poor condition of the site's office space, which includes its very low EPC rating and inability to reconfigure to more desirable multi-occupancy employment models, has resulted in the site being vacant since 2021. There is no expected tenant which would occupy the building anytime soon due to the cost to upgrade the building to meet current legislative requirements.

Office Market Trends

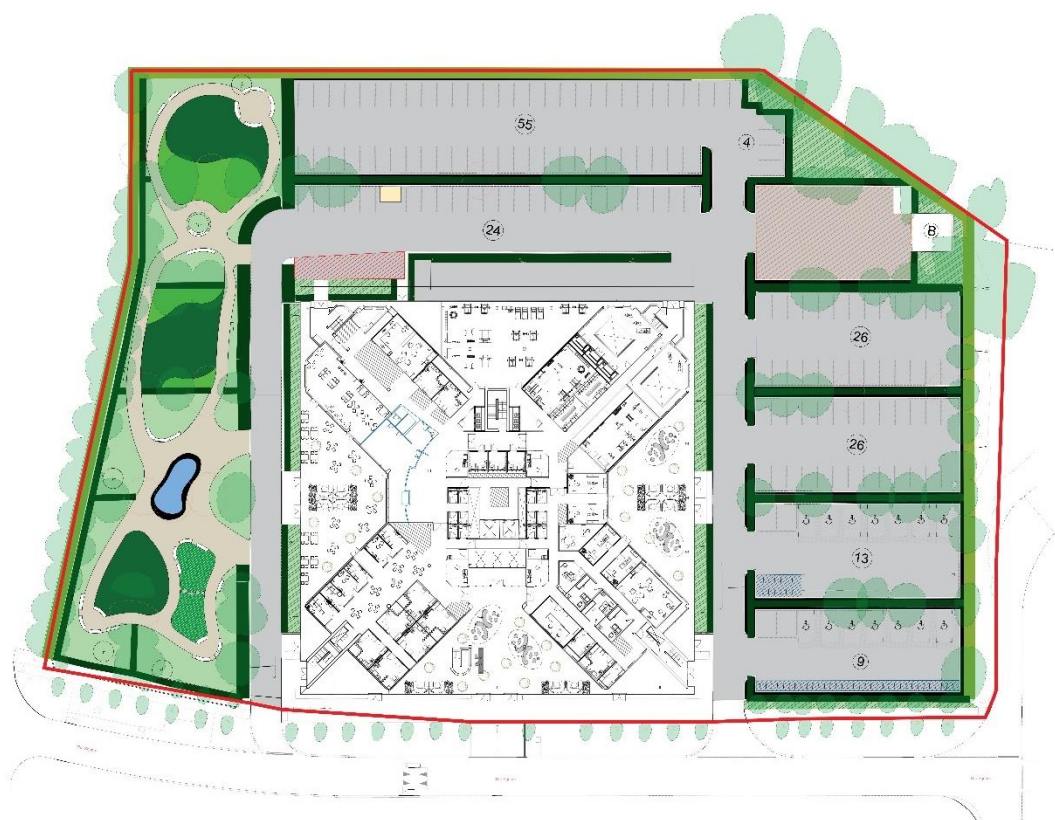
- 3.10 The 2024 Office Market Analysis conducted by Iceni Projects for the site looked at the condition of the existing office space at the site, an overview of the local and wider office market, the demand for post-operative care.
- 3.11 Regarding office demand, it found that office space was weak at all relevant scales ranging from LBH to London. Demand for in the LBH is expected to remain weak leading to increasing vacancy rates, which is particularly evident for office space similar to the application site.
- 3.12 Demand at Stockley Park was found to be even more subdued than then LBH average, with vacancy rates only expected to increase. This aligns with a Cushman and Wakefield analysis that demand for office space for business parks is subdued and declining.
- 3.13 There is therefore a wide variety of available space at Stockley Park including some which have been vacant for a significant period of time and some which is newly completed (Prologis Park West London Phase 2).
- 3.14 In summary, given the low and declining demand for business park office space as set out above, there is clear scope for the loss of some office space at Stockley Park in order to ensure the most productive use of land and property.

4. PROPOSED DEVELOPMENT

- 4.1 The planning application seeks full planning permission to change the use of the existing office buildings to provide a post-operative care facility. The proposals involve the refurbishment and repurposing of the existing office building to bring it back into viable use, alongside landscaping improvements to the surrounding outdoor space.
- 4.2 The description of development is as follows:

Full planning permission for the change of use of existing office building (Use Class E, formerly Use Class B1) to a post-operative care facility (Use Class C2) and external works to the building, landscaping, parking, and all associated works.

Figure 4.1 Proposed Site Plan



Change of Use

- 4.3 The proposed development would result in the loss of office floorspace (Class E), to provide a post-operative care facility (Use Class C2) with no major changes to the external façade. The existing ceiling heights are adequate for most medical uses, so no structural changes are required.

4.4 This acknowledged, the following changes will be included as part of the proposed scheme:

- Change of use to facilitate new medical wings comprising of approximately 100 one-bed patient rooms;
- Provision of new post-operative care facilities including examination rooms, MRI and radiology equipment and hydrotherapy pools;
- Replacement of existing façade materials like-for-like to provide air leakage and thermal performance requirements to current market standards; and
- External landscaping works to provide a rehabilitative garden for patients and address the listed building within the site.
- New parking and servicing layout to meet the requirements of the new use.

Landscaping

4.5 The proposed site layout aims to maximise the amenity space available with a focus on healthy environments which benefit the patients, visitors, and staff.

4.6 This will be achieved through a reduction in the existing car parking spaces. This will allow for a large portion of the existing car park to be redeveloped, with the western side of the site to provide a biodiverse and rehabilitative garden, which will provide amenity benefits for patients and staff as well as ecological gains.

4.7 The southern entrance to the site will be landscaped to increase the safety and legibility of pedestrian pathways in order to encourage non-motorised transport initiatives.

4.8 Biodiversity will be improved through reviewing the character and species mix of Stockley Park in order to protect and enhance the woodland buffer north of the site. This in turn is also expected to reduce the Urban Heat Island Effect.

Design and Materiality

4.9 The proposed post-operative facility will retain the existing structure and features of 3 The Square with external alterations only relating to the replacement of materials with similar modern materials to meet current sustainability requirements. The external glass façade will be replaced to a similar finish to ensure there is a bright and airy interior, as well as ensuring that the design-led external landscaping flows seamlessly into the internal environment. Internally, the building would be designed to be a calming and therapeutic environment and make best use of existing winter gardens.

-
- 4.10 The retention of the existing building will ensure that the heritage will be preserved, with only minor refurbishment of the façade to maintain the openness created by the building structure and materiality.

Access, Servicing and Parking

- 4.11 It is expected that the proposed development will utilise the existing main vehicular access and egress points since they have been designed to a standard that allows for higher traffic movements throughout the day. Additionally, the access and egress points for pedestrians and cyclists to will remain the same to The Square.
- 4.12 Under the proposals, the car parking to the west of the building will be redeveloped into a landscaped urban area, resulting in significant reductions to the loss of car parking spaces. The remaining parking will be comprehensively designed to separately serve operational / HGV traffic and the staff and visitor car parks.
- 4.13 Up to 7% of the proposed car parking spaces will be designed under accessible standards, in accordance with London Plan policy, as well as 5% of overall car parking spaces including provision of electric vehicle charging points (EVCP).
- 4.14 Cycle parking infrastructure will be improved by implementing a better range of cycle parking types, which includes policy compliant long stay and short stay parking, as well as parking designed to accommodate larger or adapted cycles. Short stay cycle parking will be located externally, close to the entrance of the building in a highly visible location to provide safe and convenient cycle storage.
- 4.15 Further to this, the shuttle bus service (now called easitSTOCKLEY PLUS+) will continue to be funded to ensure a 20-minute frequency between Has and Harlington Station and Stockley Park throughout the day.
- 4.16 Associated delivery and servicing trips for the use class will be fully accessed within the Outline Delivery and Servicing Plan (DSP).
- 4.17 Adequate storage for refuse and recycling has been provided in accessible locations and sufficient space will be provided in each collection location/area for refuse vehicles to manoeuvre so that they can enter and exit in forward gear. This will be collected from the proposed service area where access to the bin storage areas is provided.
- 4.18 The site benefits from a dedicated ambulance set down off area located to the rear of the building, and emergency vehicles such as fire appliances will be able to adequately access the site from the

existing access off The Square. Further details provided in the Car Parking Management Plan (CPMP).

5. PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principal planning policies which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations.

5.2 The Development Plan consists of:

- The London Plan (2021)
- The London Borough of Hillingdon Local Plan Part Two (2020)
- The London Borough of Hillingdon Local Plan Part One (2012)

5.3 Other material considerations include:

- National Planning Policy Framework (2023)
- National Planning Practice Guidance (2021)

National Planning Policy

5.4 The National Planning Policy Framework (NPPF) provides the planning policies for England and how these should be applied. This section provides an overview of the Government's national planning policy and guidance that is relevant to the proposed development.

Table 5.1 Relevant National Planning Policy

Policy Details	Policy Synopsis
Achieving Sustainable Development	<p>Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>Paragraph 8 of the NPPF highlights that achieving sustainable development has three overarching objectives – an economic, a social and an environmental objective, which are interdependent and need to be pursued in mutually supportive ways:</p> <ul style="list-style-type: none">• an economic objective – to help build a strong, responsive and competitive economy;

	<ul style="list-style-type: none"> • a social objective – to support strong, vibrant and healthy communities; and • an environmental objective – to protect and enhance our natural, built and historic environment. <p>Paragraph 9 of the NPPF states that planning decisions should play an active role in guiding development towards sustainable development solutions, but in so doing, should take local circumstances into account, to reflect the character, needs and opportunities of each area.</p>
Decision Taking	<p>Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development, and identifies how decision taking should be undertaken.</p> <p>Paragraph 12 highlights that local planning authorities may take decisions that depart from an up-to-date Development Plan, but only if material considerations in a particular case indicate that the Plan should not be followed.</p>
Building a strong competitive economy	<p>Paragraph 85 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.</p> <p>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.</p>
Promoting Healthy and Safe Communities	<p>Paragraph 96C Planning policies and decisions should aim to achieve healthy, inclusive, and safe places and beautiful buildings which enable and support healthy lifestyles, especially where it would addresses identified local health needs.</p>
Promoting sustainable transport	<p>Paragraph 104 states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that the impact upon local transport networks can be addressed and opportunities to promote walking, cycling and public transport use are maximised.</p>
Making effective use of land	<p>Paragraph 123 states that 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.</p> <p>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.</p>
Meeting the challenge of climate change,	<p>Paragraph 159 details that new developments should be planned to avoid increased vulnerability to the range of impacts arising from climate change. Care should be taken to ensure that risks can be managed through infrastructure when a new development is brought forward in an climate vulnerable area. Management strategies should include suitable adaptation measures, including through the planning of green infrastructure. Additionally, new developments should help to reduce greenhouse gas emissions, such as through its location, orientation, and design.</p>

flooding and coastal change	Paragraph 173 notes that Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should take account of advice from the lead local flood authority, have appropriate proposed minimum operational standards and have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development and where possible, provide multiple benefits.
Conserving and enhancing the natural environment	Paragraph 180 states that planning decisions should contribute to and enhance the natural and local environment by, <i>inter alia</i> , minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.
Conserving the Historic Environment	Paragraph 195 outlines that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they are enjoyed for their contribution to the quality of life of existing and future generations. Paragraph 200 highlights that development proposals should identify and assess the particular significance of any heritage asset that may be affected by a proposal.

The London Plan (2021)

- 5.5 The London Plan comprises part of Hillingdon's Development Plan and provides a strategic planning policy framework guiding development within the London city region on matters relating to housing, the economy, the environment, transport and social infrastructure. It was adopted in March 2021. The policies the policies in Table 4.5 are relevant to the proposal.

Table 5.2 Relevant London Plan Policies

Policy Number	Policy Synopsis
Policy GG2	Establishing the need to make the best use of land, including respecting the protection of the Green Belt and creating new urban greening and securing net gains in biodiversity on site.
Policy GG6	Ensuring that energy and sustainability and combatting climate change is at the forefront of new development as London moves towards becoming a zero-carbon city by 2050.
Policy SD1	Establishing that Opportunity Areas fully realise their growth and regeneration potential.
Policy D3	Details that all developments must utilise a design-led approach that optimises the site capacity through considering the most appropriate form, experience, and quality and character.
Policy D5	Outlining the expectations that the highest standards of accessible and inclusive design be considered at the earliest stages of development and incorporated accordingly. These considerations must also ensure the development is inclusive in terms of access and movement whilst on site.

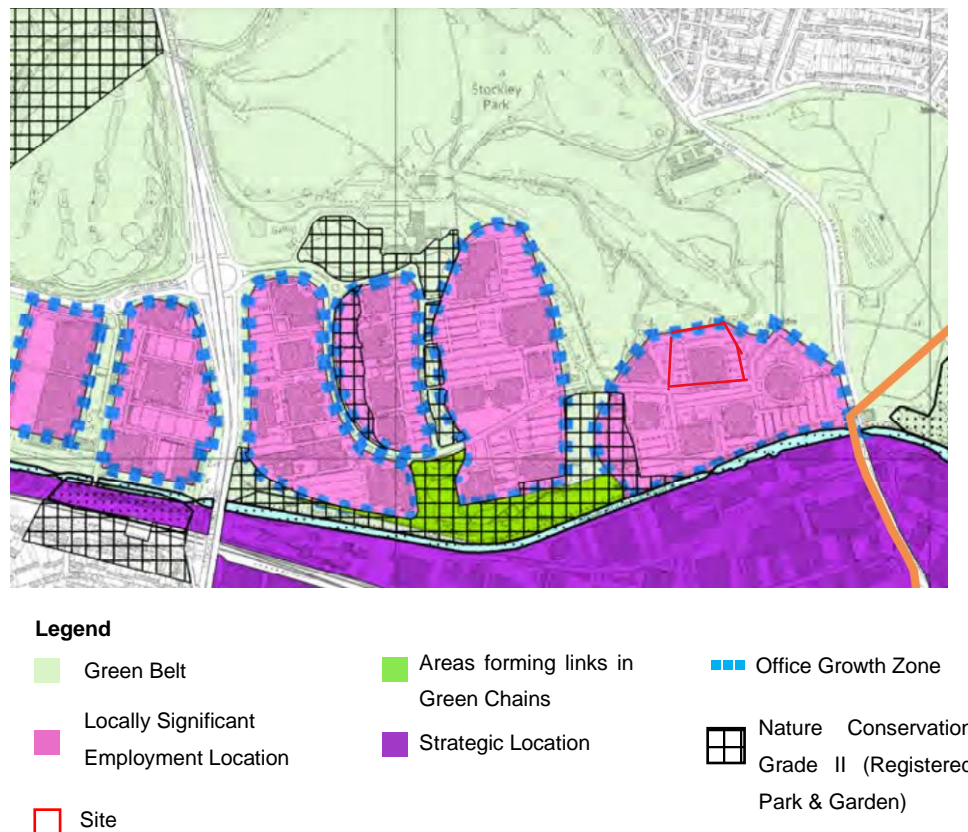
Policy Number	Policy Synopsis
Policy D11	Ensuring that all new development incorporates measures to design out crime and ensure the safety of its end users.
Policy D12	Ensuring that new developments are designed to incorporate the highest standards of fire safety and the wellbeing of future users, with major developments supported by a Fire Statement.
Policy D14	Ensuring that new developments should ensure that noise impacts are considered and suitably managed and mitigated.
Policy S2	<p>Outlining that a Borough 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.</p> <p>Sub policy S2C adds that the Borough should also support new facilities that are easily accessible by public transport, cycling and walking.</p>
Policy SI1	Establishing that all new development proposals should be Air Quality Neutral and propose measures to ensure that a scheme does not contribute towards further deterioration of existing poor air quality and does not create unacceptable risk of high levels of exposure to poor air quality.
Policy SI2	Outlining that new major development should be Net Zero Carbon, reducing emissions in operation and minimising energy demand in accordance with the GLA's energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required.
Policy SI4	Outlining that new developments must demonstrate how overheating to new homes will be managed naturally, without relying upon air conditioning.
Policy SI6	Outlining that development proposals should ensure there is sufficient ducting space for full fibre connectivity infrastructure to all end uses within the new developments, meet expected demand for mobile connectivity generated by the development, take measures to avoid reducing connectivity surrounding the development, and support the use of rooftops and the public realm to accommodate mobile digital infrastructure.
Policy SI7	Outlining the emphasis placed on Circular Economy principles within GLA Referrable applications and reducing waste as part of development.
Policy SI12	Outlining that developments should be provide the necessary technical reports, and ensure that flood risk is minimised and mitigated.
Policy SI13	Details that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to the source as possible. There should be a preference for green over grey features, in line with the London Plan drainage hierarchy.
Policy E1	<p>Outlining, within Part D that office markets in London should be consolidated, and extended, if possible, to focus new development to town centres and office clusters. Stockley Park is noted as an office cluster area, and notes that its growth should be supported by improvements to improve walking, cycling and public transport connectivity.</p> <p>Part H adds that the change of use of surplus office floorspace to residential use is acceptable, providing that it can be demonstrated that it is no longer in demand from commercial occupiers.</p>

Policy Number	Policy Synopsis
Policy G1D	Sets out that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
Policy G2	Details that the Green Belt should be protected from inappropriate development.
Policy G5	Establishes that major development proposals should contribute to the greening of London through utilising Urban Greening Factor to urban greening and landscaping strategies.
Policy G6	Outlining, inter alia, that new development should seek to ensure a positive impact on biodiversity and secure net biodiversity gain.
Policy T2	Emphasising that Development Proposals should comply with the Mayor's Healthy Streets Approach, encouraging sustainable transport and facilitating walking and cycling journeys.
Policy T3	Outlining within Part E that development proposals should support uplifts to capacity, connectivity and other improvements to the bus network.
Policy T5	<p>Setting out the minimum cycle parking standards for new residential developments to encourage sustainable development as follows:</p> <ul style="list-style-type: none"> • 1 space per studio or 1bed 1person dwelling • 1.5 spaces per 1bed 2person • 2 spaces for all other homes <p>Long stay parking is required at a level of 2 spaces for 5 to 40 dwellings: and thereafter 1 space per 40 dwellings.</p>
Policy T6	<p>Establishing that car parking provision is to be applied in line with levels of existing and future public transport accessibility and connectivity, through maximum parking standards.</p> <p>Noting the future direction of travel, infrastructure for electric or Ultra-Low Emission vehicles is required, with at least 20% active charging facilities and passive provision for all remaining spaces.</p> <p>Sub policy T6.1 outlines that maximum parking standards for PTAL 0-2 sites in Outer London comprise between 0.75 and 1.5 spaces per 1-2 bed unit and 1-1.5 spaces per 3= bed unit.</p>
Policy T7	Outlining requirements for delivery and servicing arrangements to be robustly considered as part of major applications.

LBH Local Plan Part One (2021)

- 5.6 The Hillingdon Local Plan Part One sets out the key strategic policies underpinning the planning strategy and vision for Hillingdon for the period 2011-2026 and was formally adopted in November 2012. 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.

Figure 5.1 Local Plan Policy Map (2020)



5.7 The policies in Table 5.3 are relevant to the proposed development.

Table 5.3 Relevant Local Plan One Policies

Policy Number	Policy Synopsis
Policy EM1	Addressing climate change mitigation through the development process, including through implementation of renewable energy measures where appropriate.
Policy EM6	Ensuring new development makes provisions for Sustainable Urban Drainage Systems (SuDS) unless demonstrated to be unviable.
Policy EM7	Protecting Nature Conservation Sites of Borough Grade II and Local Importance from any adverse impacts or loss of biodiversity as a result of new developments, with the provision of further biodiversity desirable.
Policy SO15	Protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses.

Policy E1	The Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63 hectares of new employment land.
Policy CI1	Outlining 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.

LPA Local Plan Part Two (2020)

- 5.8 The Hillingdon Local Plan Part Two sets out the detailed development management policies for the Borough that will form the basis of the Council's decisions on individual planning applications. It was formally adopted in January 2020.
- 5.9 The policies in Table 5.4 are relevant to the proposed development.

Table 5.4 Relevant Local Plan Part Two Policies

Policy Number	Policy Synopsis
Policy DME1D	<p>Proposals for other uses will be acceptable in SILs, LSELs and on LSIS only where:</p> <ul style="list-style-type: none"> • There is no realistic prospect of the land being developed in accordance with criterion A, B or C; or • Sites have been vacant and consistently marketed for a period of 2 years; and • The proposed alternative use does not conflict with the policies and objectives of this Plan. • Development adjacent to SILs, LSIS and LSELs must be located and/or designed so as to not to compromise the integrity or operation of these employment areas. • Proposals for small scale ancillary development which supports occupiers and the workforce on designated employment sites, such as 'walk to' services including workplace crèches, cafes and small scale food outlets, will be supported.
Policy DME3	Highlighting 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:

	<ul style="list-style-type: none"> • The site has been actively marketed for two years; • The site is no longer viable for office use, taking account of the potential for internal and external refurbishment; and • Surrounding employment uses will not be undermined.
Policy DMHB11	<p>Ensuring that good design is integral to all new development coming forward, with a focus on protecting and enhancing the local environment and harmonising with surroundings.</p> <p>There is also a focus on ensuring that a robust approach to quality of residential amenity, daylight/sunlight considerations and refuse arrangements is provided within new development proposals.</p>
Policy DMHB14	<p>Requiring the retention and enhancement of existing on-site biodiversity as part of new development proposals, as well as a hard and soft landscaping scheme suitable to the character of the area.</p>
Policy DMHB15	<p>Ensuring that new development complies with the Secured By Design Principles and delivers a safe, inclusive residential environment as part of the implementation of good design principles. This includes maximising defensible space, provision of natural surveillance and, where appropriate, CCTV and lighting.</p>
Policy SO6	<p>Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.</p>
Policy DMEI1	<p>All major development should incorporate living roofs/walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided.</p>
Policy DMEI2	<p>Establishing the requirement for all new major development to demonstrate through provision of an Energy Assessment how carbon dioxide emissions will be limited and requiring an off-site financial contribution for any shortfall against Zero Carbon targets.</p>
Policy DMEI3	<p>Establishing the requirement for major developments are required to be designed to be able to connect to a Decentralised Energy Network and in some cases, offer provision to connect to future planned networks if located within close proximity.</p>

Policy DMEI 14	<p>Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.</p> <p>Development proposals should, as a minimum:</p> <ul style="list-style-type: none"> i) be at least “air quality neutral”; ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.
Policy DMEI7	Outlining the requirement of new major development to retain and enhance existing features of biodiversity and avoid any loss or harm.
Policy DMEI14	Ensuring that developments strive to be ‘Air Quality Neutral’ and consider risks caused by pollution and emissions. Developments in Air Quality Management Areas should seek to contribute towards improvement.
Policy DMT1	Outlining the requirement for sustainable transport to be at the heart of all new development proposals and that the transport impacts of new larger developments are robustly considered and set out within an accompanying Transport Assessment and Travel Plan.
Policy DMT2	Outlining the requirement for the highways impacts of development proposals to be considered, including matters relating to road safety, accessibility, amenity impacts including congestion and pedestrian and cyclist safety.
Policy DMT4	Establishing considerations in respect of public transport provision as part of new developments and that developers may be required to input towards new public transport and sustainable transport infrastructure.

6. PLANNING ASSESSMENT OF THE PROPOSALS

- 6.1 This section reviews the key planning considerations arising from the Proposed Development. It provides a reasoned justification for the Proposed Development in the context of relevant policy and the specifics of the site and its surroundings.

Principle of Development

Loss of Employment Use

- 6.2 The application proposes the change of use of the vacant office building (Use Class E, formerly Use Class B1) into a post-operative care facility (Use Class C2).
- 6.3 London Plan Policy E1 part D notes that office markets should be consolidated, and where viable, extended in urban business parks such as Stockley Park. Policy E1 part I goes on to state that the redevelopment and/or change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H.

Table 6.1 Assessment of Policy E1 Parts G and H

Policy Description	Assessment
Policy E1 Part G - Development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace.	3 The Square is unable to provide lower cost/affordable office floorspace. As outlined in the submitted marketing report and viability assessment, the building's current state means it cannot currently be let without significant refurbishment to bring it up to lettable standards. However, the rent that could be achieved from this would mean that the development would not be viable as it would result in a significant financial loss. On this basis, it is therefore considered that provision of the space for lower cost/affordable workspace would require the same upgrades but result in an even larger financial shortfall. It is therefore considered to not be suitable for this use.
Policy E1 Part H - The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored.	The inability for 3 The Square to be subdivided into smaller units in a multiple occupancy model is due to the layout and core design. As detailed in Section 4.0, it could not be effectively achieved whilst at the same time achieving suitable provision for central lift, toilet and lobby access. This option has been previously explored and found unviable.

- 6.4 It is clear therefore that the site meets the London Plan criteria to be considered for uses other than office developments, however it should be noted that the site is also within a Locally Significant Employment Location within the Hillingdon Local Plan. This means that the proposed scheme should also be assessed against Local Plan policy DME 3 Part B and will therefore need robust justification.

Table 6.2 Assessment of Policy DME3 Part B

Policy Description	Assessment
Policy DME 3 Part B i – the site has been actively marketed for two years.	It has been confirmed that the site has been marketed since mid-2020 when Canon announced they will be seeking alternative office space. This is in line with the market trends shown in the Property Market Evidence report which forms part of this application.
Policy DME 3 Part B ii – the site is no longer viable for office use, taking account of the potential for internal and external refurbishments.	<p>The site has an EPC rating of G, preventing it from being used unless intense investment is undertaken to achieve the policy compliant level of C or above. This finding has been supported by the Viability Assessment of the site, which provides evidence that even if the building was to be refurbished, there would be a loss in rent. This has put off any potential occupiers.</p> <p>Further to this, the internal layout of the building in relation to its core means that it is incompatible with subdividing the building into multiple, smaller offices.</p>
Policy DME 3 Part B iii – surrounding employment areas will not be undermined.	<p>The Property Market Evidence report outlines that there is a shortage of post-operative care facilities in the UK, and in particularly in the south of England, due to there being only four dedicated post-operative care facilities in the UK and only one in the South of England (Lambeth Community Care Centre).</p> <p>Further to this, the UK has below the OECD average of hospital beds per 1000 inhabitants, with the UK having 2.4 beds per 1,000 inhabitants and the OECD median being 3.5.</p> <p>In summary, the proposed development will not undermine any surrounding employment types due to the shortage of post-</p>

	operative care facilities nationally, and therefore will not be in competition with any nearby employment areas.
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- 6.5 With the assessment of Policy DME3 part B considered, it can be justified that despite LBH Policy E1 stating that LSEs such as Stockley Park should be protected to accommodate growth, the policy is out of date. This is evident with it being estimated Hillingdon's employment to grow from 201,000 in 2011 to 210,000 by 2026, with much of this growth based in offices¹. The Economic Benefit Report associated with the proposed scheme disputes this estimate by finding that there are 197,400 people employed in LBH as of 2023, highlighting economic demand in the borough is below previous expectations.
- 6.6 Further to this, the Policy SO15 highlights that employment land should be protected to meet needs of different sectors of the economy. This considered, the proposed development would still protect employment uses, with pre-app feedback determining that a post-operative care facility would provide comparable employment opportunities as an office, and the Property Market Evidence report confirming that there is an unmet demand for post-operative care facilities.
- 6.7 These points considered, there is a strong argument for the proposed scheme being a suitable fit for Stockley Park, even with the LSEL designation due to many of the needs of a business park compliment the needs of a medical facility and the LSEL designation intended to give flexibility to ensure the long-term viability of business parks.

Provision of a Post-Operative Care Facility

- 6.8 The NPPF outline 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 Property Market Evidence report highlights that there is a long-term dip office park demand, and therefore alternative employment uses would support economic growth and productivity in the area.
- 6.9 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. The Property Market Evidence report shows that the population of over 65s in London will grow by nearly 50% by 2040 compared to overall population growth of just 12%. This therefore highlights a need to provide more medical bedspace, especially due to the UK's below OECD-average number of beds per 1,000 inhabitants. This

¹ GLA Economics Working Paper 39: Borough employment projections to 2031 (Greater London Authority, November 2009); Table 9.

therefore supports the argument that Stockley Park would be an ideal location for a post-operative care facility.

- 6.10 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. Therefore, the proposed development should be assessed against this policy.

Table 6.3 Assessment of London Plan Policy S2

Policy Description	Assessment
Policy S2 Part 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	As previously outlined, the identified need for post-operative care facilities identified in the Property Market Evidence report shows that the proposed development should be supported.
Policy S2 Part C - New facilities should be easily accessible by public transport, cycling and walking.	The high-quality and sustainable public transport links in the area connect Stockley Park to the rest of London's public transport network. For example, it only takes 17 minutes reach Paddington Station and 30 minutes to reach Liverpool Street Station when using the Elizabeth Line. This furthers the argument that the site is a sustainable location for a post-operative care facility since patients and staff would be able to visit from most of Greater London thanks to the mentioned convenient links to major railway stations. This is particularly important for medical facilities which require a diverse and highly skills workforce.

- 6.11 The applicant is engaging with the local NHS group to understand how the proposal could support and enhance existing local services to release pressure on these services.
- 6.12 LBH's Local Plan Part 1 encourages the development of community facilities in the Borough including health facilities to better meet the needs of all sections of the community. As per Policy SO6, the health facility provision should be accessible and inclusive to all potential users regardless of age,

ability, gender, or socio-economic status. This considered, the proposed scheme supports this policy by providing a sustainably located health facility which will benefit the local community with improved health promotion, as well as increasing the number of local job opportunities.

- 6.13 The site's sustainable location is highlighted by being situated in a densely populated area which has 2,644 people per sq km as of the 2021 Census, and therefore provides a large potential source of staff and patients which would be able to easily access the site. Further to this, the high-quality and sustainable public transport links in the area, as identified in the Travel Assessment, connect Stockley Park to the rest of London's public transport network.

Conclusion

- 6.14 Overall, having considered both London and LBH Local Plan policy, there is a clear argument that the proposed scheme has principle of development due to the minimal negative impacts a change of use would have if change from office use to post-operative care use. This is supported by the ongoing lack of demand for this type of office development, as well as the building's inability to be retrofit to provide multiple occupancies or provide cheaper rent due to investment needs to increase its EPC rating. While being a LSEL designation, the proposed scheme would provide similar levels of employment and also demonstrates that it meets both LBH Local Plan policy and London Plan policy.
- 6.15 Further to this, the site is sustainably located to support a health centre due to its proximity to a large population, as well as having high-quality public transport links to London and the surrounding Southeast.

Design

- 6.16 Policy D3 of the London Plan requires all proposed developments to optimise site capacity through the design-led approach, and therefore the proposed scheme should be assessed against it.

Table 6.4 Assessment of London Plan Policy D3

Policy Description	Assessment
Policy D3 – The design-led approach	The proposed scheme carefully considers the employment allocations as discussed previously, as well as ensuring it is appropriate for the site's context by only refurbishing the internal components of the building. Further to this, the site's Registered Park and Garden designation is considered when redeveloping the external land through landscape-led regeneration which compliments the designation.

Policy D3 – Form and layout considerations	<p>The building's scale and external appearance will remain the same to ensure the proposed redevelopment fits the context of Stockley Park.</p> <p>The external layout has been optimised for pedestrians and cyclists, with legible pathways linking the site to Stockley Park and the Wider area.</p>
Policy D3 - Experience	<p>The proposed scheme will achieve a safe, secure, and inclusive environment through a range of design features detailed in the Design and Access Statement.</p> <p>Conveniently located green and open spaces for social interaction and physical activity. This is seen with the site redeveloping the winter gardens in the reception area now providing a café and gathering spaces to encourage spontaneous social interaction.</p> <p>Therefore, the proposed scheme will achieve indoor and outdoor environments that are comfortable and inviting for people to use.</p>
Policy D3 – Quality and Character	<p>The proposed development responds to the existing character by acknowledging the Registered Park and Garden in the landscaping plan to ensure that the amenity and ecological benefits are maximised.</p> <p>Further to this, the building refurbishment will be of high quality to ensure that the EPC rating is increased from a G rating to C rating. This will be achieved through interventions within the skin of the building to improve thermal performance, upgrade to the mechanical ventilation with heat recovery</p>

- 6.24 The design of the proposed needs be inclusive, with no disabling barriers, and providing independent access without additional undue effort as stated in Policy D5 of the London Plan.
- 6.25 With safety in mind, the LBH Local Plan Policy DMHB 15 notes that new developments are required to ensure safe and attractive public and private spaces through referring to the Council's guidance on Secured by Design Principles. This considered, the Design and Access Statement shows that the proposed building will have card readers controlling the physical access of people into non-public

parts of the building. Visitor management will employ all visitors to sign in at reception with temporary badges issues for authorised access. Additionally, CCTV cameras will be installed at key points, including entrances, exits, hallways, parking lots. Therefore, it can be established that the appropriate crime prevention strategies have been implemented. Therefore, the proposed scheme meets LBH Policy DMHB 15.

- 6.26 Policy D11 from the London Plan outlines that the proposed scheme must prepare for emergencies listed out in the London Risk Register, as well as extreme events caused by climate change. As noted above, there are satisfactory security measures in place, as well as there being needed emergency plans in place. This includes emergencies caused by climate change, with the associated climate mitigation measures detailed in the Design and Access Statement and Sustainability Appraisal.
- 6.27 Policy SI 6 of the London Plan outlines that development proposals should ensure that there is sufficient space for full-fibre connectivity infrastructure, it meets expected demand for mobile connectivity, and take measures to avoid reducing surrounding mobile connectivity. This considered, the proposed scheme meets all these criteria.
- 6.28 These design considerations are mirrored in LBH's Local Plan with DMHB11 requiring all developments to be designed to the highest standards and incorporate principles of good design which consider the massing, architectural quality, local topography and layout. The sensitive redevelopment of the existing building and landscape-led enhancement of the external and as detailed previously show that the proposed development meets this policy.

Landscaping

- 6.29 The proposed development intends to redevelop the external parts of the site through a ecological-led new garden on the land of the current western car park.
- 6.30 Pathways and surfaces will be designed to facilitate ease of use and accessibility across the site and will look to draw upon the wider principles used in the design of the historic park and gardens.
- 6.31 A permeable, resin-bound pathway will take users around the site while helping to drain the site sustainably. To accommodate the pathways into the wider landscape, a natural/buff coloured stone similar to that found within the wider park will be chosen. In using resin-bound finish, the gardens will be usable throughout the year, with little maintenance required to make sure it stays a safe and accessible space.
- 6.32 Due to the site's landscape falling within the Registered Park and Garden, this has been detailed in full in the heritage section.

Heritage

- 6.33 Paragraph 195 of the NPPF states that Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Further to this, Paragraph 200 of the NPPF also states that proposals affecting heritage assets should recognise the significance of any heritage assets affected, including contribution to their setting.
- 6.34 The site falls within the Stockley Park Grade II Registered Park and Garden designation, which was first designated in August 2020 due to its high-quality amenity provision and landscaping. This forms a foundational basis for the proposed development's heritage strategy.
- 6.35 London Plan Policy D3 details that all developments must utilise a design-led approach that optimises the site capacity through considering the most appropriate form, experience, and quality and character. The proposed scheme will keep the building's external appearance the same, with only minor refurbishments to the façade, and the internal composition of the building to be largely redeveloped to create a new long-term use for the site. Further to this, the landscaping strategy was heavily informed by the original design scheme, shown with the proposed western garden being designed around the cellular plan of the business park. These points considered; the scheme meets Policy D3 of the London Plan.
- 6.36 Policy HE1 on the LBH Local Plan states that Registered Parks and Gardens should be conserved, enhanced and encourage the reuse and modification of heritage assets when considering the impacts of climate change.
- 6.37 The proposed development sensitively considers the heritage designation and relevant policy highlighted above through low maintenance urban greening which focuses on RHS Pollinator Friendly plants, which seek to create a climate-friendly plant pallet. The western carpark will be redeveloped into a new landscaped garden area which seeks to enhance Stockley Park's public amenity space, with permeable materials used to ensure the new parkland is adapted to the effects of climate change. Lastly, new water features and benches will be installed to provide new amenity opportunities for staff and visitors of the site to enjoy the parks and gardens.
- 6.38 Overall, the proposed scheme is therefore policy compliant with the above heritage policies. A full heritage assessment has been completed as part of this proposed scheme.

Transport

- 6.39 Local Plan Policy T2 states that developments should delivery patterns of land use that facilitate residents making trips increasingly by walking or cycling. Part D outlines what development proposals should provide, and therefore will be assessed against.

Table 6.6 Assessment of London Plan Policy T2

Policy Description	Assessment
<p>Policy T2 D1 - demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance</p>	<p>All outdoor pathways on the site will be 1.8-2m wide to allow both wheelchair users and those accompanying them to walk side by side through the garden for all pedestrians.</p> <p>The Travel Assessment found that travel by public transport, cycling and walking is encouraged in the proposed scheme through being linked to good footway and cycle links, as well as being close to frequent bus and rail services which supply good area coverage.</p> <p>There are numerous benches throughout the site allowing people to rest and socialise.</p> <p>Air Quality Assessment finds that the proposed scheme is compliant with air quality policy.</p> <p>CCTV and electronic access ensure that people feel safe, with both the internal and external layout being ideal for natural surveillance opportunities.</p>
<p>Policy T2 D2 - reduce the dominance of vehicles on London's streets whether stationary or moving</p>	<p>The number of car parking spaces is being significantly reduced in the proposed scheme to reduce the dominance of car-use when traveling to the site.</p>
<p>Policy T2 D3 - be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport</p>	<p>The redeveloped western carpark into a landscaped garden has utilised legible footpaths and cycle links throughout the site, and the wider Stockley Park context. Further to this, the surrounding entrances on the site will be redeveloped to further ensure permeable pedestrian and cycle pathways.</p>

6.42 With the points above considered, the proposed scheme is shown to be compliant with Policy T2. Additionally, it also shows that it is compliant with Local Plan Policy S2 Part C, which outlines that new health facilities should be easily accessible by public transport, cycling and walking.

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- 6.43 Policy T5 of the London Plan outlines that development proposals should help remove barriers to cycling and create healthy environments in which people choose to cycle. The London Plan cycle parking standards are minimums and for C2 uses 1 space per 5 FTE staff for long stay space and a minimum of 1 space per 20 bedrooms for short stay spaces. However, whilst the LBH standards are similar for the use class, they are maximum numbers and they do not require the additional short-term spaces for Care Homes. For Care Homes it is required at 1 space per 3 staff, whilst Hospitals require 1 space per 5 staff and 1 space per 10 visitors. For this reason, it will not be possible to satisfy both London Plan minimum standards and LBH maximum standards. In an attempt to comply with both the London Plan and LBH standards, the proposed volume of cycle parking is above the London Plan minimum standard for C2 uses and the maximum LBH standards for the use.
- 6.44 Policy T6 of the London Plan details that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. This considered there is no parking standards for Use Class C2 and should therefore be determined on a case-by-case basis. Based on the Travel Plan and Travel Assessment, the proposed scheme will see a clear decrease in car parking spaces, with 7% of remaining spaces being adapted to be accessible. Given the nature of the post operative care facilities provision will be made for emergency vehicle parking (a dedicated ambulance set down area), loading and unloading (again an additional area), which will see a net reduction in the number of parking spaces on Site.
- 6.45 Policy T7 Part G of the London Plan outlines that development proposals facilitate safe, clean, and efficient deliveries and servicing. The Transport Assessment outlines that servicing and operational delivery vehicles will access the service area via separate access points, with this being deemed adequate to service the post-operative care facility. Further to this, recycling and refuse generated by the Proposed Development will be collected from the proposed service area where access to bin storage areas are provided, and adequate storage for refuse and recycling has been provided in accessible locations. Lastly, the site will benefit from a dedicated ambulance set down off area which is located to the rear of the building. These points considered, the proposed scheme meets Policy T7 Part G.
- 6.46 With the points above considered, it can be seen that the proposed scheme is also compliant with LBH Local Plan Policy DMT 1, which requires development proposals to consider public transport impacts; DMT 2, which requires development proposals to consider highway impacts, as well as DMT 4, which requires development proposals to consider the optimisation of public transport connectivity.

Energy and sustainability

- 6.47 Policy S12 of the London Plan details that major developments should be net zero-carbon based on the GLA energy hierarchy, with major development needing to include a detailed energy strategy to

ensure there is a minimum on-site reduction of at least 35%, with non-residential buildings achieving 10% of this through energy efficiency measures. This therefore also relates to Policy GG6 of the London Plan which outlines that new developments should increase energy and water efficiency to increase London's resilience.

- 6.48 The proposed development achieves this through incorporating rigorous energy standards and employing electric-only systems, including air source heat pumps (ASHPs), the application will respond directly to the Climate Emergency declared by the Council in January 2020. These measures combine to provide an approximate carbon dioxide emission saving of 72% compared to the Part L:2021 baseline, significantly exceeding the requirements of London Borough of Hillingdon and the Greater London Authority (GLA). Additionally, with this considered, the proposed scheme is also compliant with LBH Local Plan policies EM1, which sets out requirements to ensure climate change mitigation, as well as Local Plan Policy DMEI 2 which requires major developments make the fullest contribution to minimising carbon dioxide emissions, as well as providing an accompanying energy assessment.
- 6.49 Policy S17 of the London Plan details that proposed developments should reduce waste and support the circular economy through minimising waste, meet recyclable waste targets, meet or exceed that 95% of construction and demolition waste is either reused, recycled or recovered. A Circular Economy Statement was completed as part of the proposed scheme which shows that the principles of a circular economy have been embedded within the design of the proposed development from the outset.
- 6.50 Through the specification of materials and systems that are easily reused and recycled, it will be ensured that the materials employed within the proposed development will be maintained at their highest possible value for as long as possible, aiding in reducing the need for new materials and therefore reducing both the waste generated by and the embodied carbon emissions associated with the scheme. Therefore, the Circular Economy Report shows that the proposed scheme meets Policy S17.

Flood and Drainage

- 6.51 Policy SI 12 of the London Plan outlines that developments should be provide the necessary technical reports and ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan also prioritise water run-off as close to the source as possible based on the drainage hierarchy.
- 6.52 Further to this, Policy EM6 of the LBH states that new developments are directed away from Flood Zones 2 and 3, with the use of Sustainable Urban Drainage Systems (SUDS) unless demonstrated not viable.

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- 6.53 It was determined that the proposed development would not be able to provide the necessary SUDS with the available space on site whilst remaining viable, and instead underground drainage pools have been proposed to collect the water on-site. Further to this, permeable outdoor paving materials will be used, as well as increasing the surface area of permeable land on site to mitigate potential flood risks. Therefore, given the site is in Flood Zone 1 it meets the above policy requirements.

Ecology and trees

- 6.54 Policy GG2 Part F of the London Plan outlines that to make best use of the land, a proposed development must promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.
- 6.55 Further, Policy DME17 of the LBH Local Plan details that the design and layout of new developments should retain and enhance existing feature of biodiversity within the site. Appropriate surveys must be submitted to demonstrate that the proposed development will not have unacceptable effects, with a positive contribution to the protection and enhancement.
- 6.56 The London Plan Policy G7 on trees requires that developments should ensure that existing trees are valued and retain if possible. The Arboricultural Report states that a number of trees will be removed to enable the proposed development, however seventeen new trees will be planted which will increase the overall species diversity of the proposed development. No trees on the site had Tree Protection Orders, and all trees would be preserved if possible. Therefore, there will be a net improvement in tree cover and tree diversity with the proposed development.
- 6.57 The Preliminary Ecological Appraisal found that the site offers poor suitability for foraging and commuting for bats, and therefore no mitigation is required in respect of roosting bats. It should be noted that there are some bat boxes already installed on-site despite the above finding. It is noted that protected nesting birds within the hedgerows and boundary features.
- 6.58 Additionally, a range of tree mounted bird boxes are proposed, and existing bat boxes will be kept. Also, wildlife-friendly species such as those on the RHS Plants for Pollinators List will be incorporated. This will be implemented throughout the site, with the proposed landscaped garden west of the building providing further benefits.
- 6.59 The Biodiversity Net Gain (BNG) Assessment shows that the proposed scheme achieves 20.59% BNG for habitat units and 10.03% BNG for hedgerow units. This is above the forthcoming requirements for +10% net gain under the Environment Act 2021.

Noise and Air

Noise

- 6.60 The proposed scheme will be assessed against London Plan Policy D14 regarding noise impacts.
- 6.61 The Noise Impact Assessment finds that significant adverse noise impacts on health and quality of life will be avoided through measures such as ensuring that the overall sound pressure levels at 1 m from the façade of the nearest noise sensitive premises do not exceed 40 dB during daytime (07:00-23:00) and 35 dB during the night (23:00-07:00). If the plant contains any tonal characteristics a further correction will be required.
- 6.62 The HTM 08-01 internal criteria will be achievable throughout the building during the day where windows are open for ventilation. However, the bedroom criteria may be exceeded during the night with windows open, and as such, provision for alternative means of ventilation to ensure appropriate levels of background ventilation during times when windows are closed may be required. If the plant contains any tonal characteristics a further correction will be required.
- 6.63 These points considered; the proposed development meets the required Noise Impact policy.

Air

- 6.64 Policy SI1 from the London Plan states that all new development proposals should be Air Quality Neutral and propose measures to ensure that a scheme does not contribute towards further deterioration of existing poor air quality and does not create unacceptable risk of high levels of exposure to poor air quality.
- 6.65 Additionally, Policy DMEI 14 of the LBH Local Plan outlines that development proposals should demonstrate appropriate reductions in emissions to sustain compliant with and contribute towards meeting national air quality objectives for pollutants.
- 6.66 The Air Quality Assessment assessed the proposed scheme against the above policies and found that with the site falling within Hillingdon's AQMA in mind, the proposed scheme will be air quality neutral regarding the building and transport emissions, in line with the above air quality policies, and as such no mitigation for emissions will be required.

Fire

- 6.67 Policy D12 from London plan states that new developments are designed to incorporate the highest standards of fire safety and the wellbeing of future users, with major developments supported by a Fire Statement.

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- 6.68 The Fire Statement outlines that fire service appliances can park on the road directly outside the front door of the building or to any point on other elevations (via the car park road), all are within 18m of the building access points. This is illustrated in the Design and Access Statement.
- 6.69 A new addressable Class L1 detection and alarm system will be installed throughout the building. Smoke detectors located throughout all spaces. Relevant smoke detection to be provided at high-level in the atria. External wall to the inner building is to be upgraded (or re-built) to provide 60minute period of fire resistance (including glazing and openings) as a compartment wall to separate accommodation from the atria (30mins when sprinklers provided).
- 6.70 A Fire Strategy will be created to identify the requirements of 'responsible persons' and 'competent persons' in discharging their responsibilities under the Regulatory Reform (Fire Safety) Order (3) and the Fire Safety Act (4) and communicate this to the client.
- 6.71 The progressive horizontal evacuation approach is also supported by adoption of evacuation lifts in the central core, which descend to a protected lobby allowing for onward evacuation to alternative compartments.
- 6.72 Escape stairs are each provided with protected lobbies and refuge spaces and lead directly to external on Ground Floor. The existing stairs are not sized for mattress evacuation. This is mitigated by provision of evacuation lifts.
- 6.73 The Ground Floor of the building is primarily amenity, reception/waiting and minor consultation rooms. Each of these areas are more aligned to self-evacuation of occupants, which is possible via doors leading to external. Notwithstanding, the Ground Floor is aligned to provide progressive horizontal evacuation if required.
- 6.74 In summary, the proposed scheme's Fire Statement covers all the needed policy requirements to ensure staff, patients and visitors are all kept safe if a fire emergency occurs.

7. SUSTAINABLE DEVELOPMENT

7.1 The NPPF states that the purpose of planning is to help achieve sustainable development. Paragraph 7 notes that the NPPF as a whole sets out the Government's view of what constitutes sustainable development, while paragraph 8 identifies three dimensions to sustainable development, comprising economic, social and environmental roles. It is our opinion that the three roles are mutually dependent and should not be taken in isolation.

7.2 The following section provides an assessment of the subject site and proposed development against these criteria, demonstrating how the scheme would bring a range of economic, social and environmental benefits to the local area and the LBH.

Table 7.1 Scheme Benefits

NPPF Sustainable Development Pillars	Benefits of the Proposed Development
Economic	<ul style="list-style-type: none">• The site has had long-term issues of vacancy and lack of demand from occupiers and is unable to provide cheaper rent or be subdivided to create more attractive office space. Therefore, securing the long-term active use of the site for new homes would optimise the use of the land in accordance with the Mayor's 'Good Growth Agenda' and representing the sustainable development of the site.• The construction of the proposed scheme will provide 389 direct jobs and 131 indirect jobs.• Overall, it is estimated that a 100 bed post-operative care facility at the Application Site would support around 250 net additional FTE jobs in the LB Hillingdon• Based on if there is 70 bed post-operative care facility at the Application Site would contribute around £15.3m in Gross Value Added per annum to the local economy• The Applicant will comply with the relevant requirements relating to planning obligations and CIL, bringing opportunities to enhance the local infrastructure in the area for residents, workers and visitors.
Social	<ul style="list-style-type: none">• Training opportunities skills due to range of different jobs.• A new garden is being created to provide increase rehabilitation space.• Health services for local community can lead to improved health outcomes for those recovering from operations and able to return to a healthy and active lifestyle more quickly.

NPPF Sustainable Development Pillars	Benefits of the Proposed Development
Environmental	<ul style="list-style-type: none"> • The provision of policy compliant cycle infrastructure better links up the site with the nearby public transport hubs such as Hayes and Harlington. This ensures fewer car journeys are needed, reducing the air pollution in the Air Quality Management designation the site is situated in. • Further to this, the planned expansion of the shuttle bus will provide a reliable and accessible public transport route from Hayes and Harlington Railway Station in order to further encourage reduced car journeys. • Remaining car parking spaces will be provided with 50 active EVCPs and 200 passive charging points to ensure that using EV vehicles is as convenient as possible if car use is needed to be taken. • The improvements to the building's energy efficiency will ensure that it goes from a policy non-compliant G rating to an EPC C rating. This will reduce the carbon emissions onsite and aligns with the local, London, and national policy on climate mitigation. Additionally, the external façade and key structural aspects of 3 The Square will be preserved, preventing much embodied carbon from being generated. • A BNG of 20.59% for habitat units and 10.03% for hedgerow units. • The outdoor areas of the site are proposed to be improved through ecological-led landscaping a more legible layout for pedestrians and cyclists. This aligns with local, London, and national policy on climate adaption to ensure that the site is future proofed from the impacts of the climate emergency.

8. PLANNING BALANCE AND CONCLUSION

- 8.1 This planning application has been prepared on behalf of F&C Commercial Property Holdings c/o Columbia Threadneedle Real Estate for the change of use of 3 The Square from office use to post-operative care use, as well as internal and external works to the buildings, landscaping, car and cycle parking and other associated works at 3 The Square, Stockley Park, Uxbridge, UB11 1ET.
- 8.2 This Planning Statement has outlined that the proposed development would bring a large, long-term vacant commercial building, with no scope for future office use, back into active use as a post-operative care facility.
- 8.3 The Proposed Development would provide significant positive economic, social, and environmental, as demonstrated throughout this Planning Statement and summarised in Section 6.
- 8.4 It was determined that the proposed scheme would be policy compliant for London Plan Policy E2 due to the site being unable to be subdivided into smaller units due to the structural limitations of the buildings layout, as well as being unable to be occupied due to having an EPC rating of G. The investment needed to bring the unit up to a compliant level would be financially unviable for any potential occupier. Additionally, the proposed scheme is also compliant with LBH Policy DME3 due to being extensively marketed for over two years, the building is not viable anymore as office floorspace and the proposed scheme will not impact the surrounding employment areas due to the noted shortage of post-operative care facilities in the UK.
- 8.5 The proposed scheme will retain the existing building and utilise high quality design in line with the original intention of the masterplan. Additionally, it was found compliant to policy relating to design, heritage, sustainability, transport, air quality, noise, and fire.
- 8.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.7 As the preceding planning analysis shows, a comprehensive assessment of the proposed development against the development plan policies has been undertaken, demonstrating that the scheme accords with both local and national policy, whilst providing numerous economic, social and environmental benefits that weigh in support of the scheme being granted planning permission. There are no technical constraints or barriers that would prevent the development from coming forward.
- 8.8 Therefore, the proposals should be approved without delay in accordance with Section 38(6) of the