

**HSBC BANK PENSION TRUST
(UK) LTD**

**UXBRIDGE -
BAKERS HOUSE
25 BAKERS ROAD**

PLANNING STATEMENT

January 2019

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1.0 Introduction

- 1.1 This Planning Statement was prepared on behalf of HSBC Bank Pension Trust (UK) Ltd (*“the Trust”*), in relation to a planning application submitted on its behalf for the redevelopment of Bakers House, 25 Bakers Road, Uxbridge (*“the Site”*).
- 1.2 Bakers House is an unattractive office building that has been largely unused for many years. The application proposes the redevelopment of it for a new hotel, which is to be operated by Premier Inn. The application scheme will make a significant positive contribution towards the regeneration of Bakers Road, within Uxbridge Town Centre.
- 1.3 Pre-application consultation took place with Officers of the Council, and a wider public consultation exercise was undertaken, before submission of the application. Arising from the pre-application discussions, the height of the building was reduced.
- 1.4 The application comprises a package of plans, drawings and reports which collectively explain the proposed development, and address the relevant planning issues raised by it. These issues are summarised in this Statement, and assessed in terms of relevant planning policies. Tables 1.1 and 1.2 below set out details of these other supporting documents and application plans.

Table 1.1: Supporting Documents

Document	Author
Design and Access Statement	Gaunt Francis
Transport Assessment	David Tucker Associates
Travel Plan	David Tucker Associates
Statement of Community Involvement	Seaxburh Partners
Energy Strategy Report	Applied Energy
External Lighting Report	Applied Energy
Landscape Proposals	Davies Landscape Architects
Heritage, Townscape and Visual Impact Assessment	Montagu Evans
Air Quality Assessment	Redmore Environmental
Historical Environment Assessment (Archaeology)	MOLA
Drainage Strategy	JPP Consulting
Contamination Assessment	JPP Consulting

Table 1.2: Application Plans

Plan Title	Plan Reference	Revision
Site Location Plan	12024 EX-P-000	
Topographical Survey	12024 EX-P-001	
Offices Basement Plan	12024 EX-P--099	
Offices Ground floor Plan	12024 EX-P-100	
Offices First Floor Plan	12024 EX-P-101	
Offices Second Floor Plan	12024 EX-P-102	
Offices Roof Plan	12024 EX-P-103	
General – Basement Car Park Plan	12024 EX-P-199	
Offices – Sections XX, YY	12024 EX-P-301	
Offices Sections ZZ	12024 EX-P-302	
Site Development Plan	12024 PL-P 001	C
Site Plan	12024 PL-P 002	C
Basement Plan Car Park	12024 PL-P 098	D
Basement Plan Hotel Lobby	12024 PL-P 099	D
Ground Floor Plan	12024 PL-P 100	D
First Floor Plan Restaurant	12024 PL-P 101	B
Second Floor Plan Hotel Accommodation	12024 PL-P 102	C
Third Floor Plan Hotel Accommodation	12024 PL-P 103	B
Fourth and Sixth Floor Plan Hotel Accommodation	12024 PL-P 104 / 6	B
Fifth and Seventh Floor Plan Hotel Accommodation	12024 PL-P 105 / 7	B
Eighth Floor Plan Hotel Accommodation	12024 PL-P 108	B
Ninth Floor Plan Plant Room	12024 PL-P 109	B
Tenth Floor Plan Roof	12024 PL-P 110	B
Section A - A	12024 PL-S 300	C
Section B - B	12024 PL-S 301	C
NW, SW and Long Section Elevations D – D E – E Bakers Road / Cocks Yard	12024 PL-S 390	D
Bakers Road Elevation	12024 PL-E 400	C
Cocks Yard / South East Elevation	12024 PL-E 401	C
Service Yard / South West Elevation	12024 PL-E 402	C
North West Elevation	12024 PL-E 403	C

- 1.5 Section 2 of this report comprises a description of the site and surrounding area. Section 3 explains the pre-application discussions on the original scheme, and Section 4 describes the proposed development subject of this application.
- 1.6 Relevant planning policy is set out in Section 5 with an assessment against policy in Section 6.
- 1.7 A summary and conclusions are set out in Section 7.

2.0 Site and Surrounding Area

Uxbridge

- 2.1 Uxbridge, and area around it expanded significantly as part of the suburban growth of London during the early-mid Twentieth Century, benefiting from the development of the London Underground system. In 1965 Uxbridge formally became part of greater London and is now the largest centre within London Borough of Hillingdon. The accessibility of the town has continued to improve throughout the twentieth and early twenty first century, through the development of the motorway network (the M40, M25 and M4 motorways pass close to the north, west and south of Uxbridge respectively), airports (the UK's largest airport, Heathrow, is a short distance to the south) and improvements to the rail network - especially Crossrail. The Elizabeth Line will have stations in the borough, to the south of Uxbridge.
- 2.2 Uxbridge is the main urban centre in Hillingdon and, as noted below, the London Plan defines it as a Metropolitan Centre which reflects its size and function, operating as part of a metropolitan wide network of significant town centres. Paragraph 5.35 of the Hillingdon Core Strategy notes that it serves a wide catchment area providing a high level and range of shopping, employment, service and leisure functions. In addition to this, it also provides accommodation for Brunel and Buckinghamshire New Universities. However, the Core Strategy goes on to note that *"Uxbridge has a very small number of hotels which support the visitor economy, and Policy E2 seeks to improve the hotel offer in Uxbridge"*.
- 2.3 The application Site is located within a secondary part of Uxbridge Town Centre, albeit a very accessible one - less than 100 metres from Uxbridge Underground and Bus Stations. The Underground station is the western terminus of the Metropolitan and Piccadilly Lines; Bakers Road accommodates numerous bus stops providing access to various parts of the Borough and beyond. It has a 6A PTAL rating.

The Site

- 2.4 The Site comprises the existing office development on the western side of Bakers Road. It forms part of an 'island' site, bounded by Belmont Road to the north, High Street to the west and Cock's Yard to the south. The island site as a whole is owned by The Trust. The location of it is shown in **Figure 2.1** (below)
- 2.5 The Island site was originally built as a single development in the 1960's. The design of it faces west towards High Street; Bakers Yard is the back side of it providing access for servicing and to the basement car park. The service area comprises a large central area within the overall island site, a picture of which is contained on page 5 of the Design and Access Statement ("DAS").
- 2.6 The scheme generally has an unattractive heavy concrete structure which dominates the main High Street frontage, and wraps around along Belmont Road. The photograph on page 7 of the DAS shows the contrasting design styles. The frontages

to High Street and Belmont Road comprise ground floor shops, restaurants and other services uses such as banks. They also contain upper floor levels which was designed as secondary accommodation for the ground floor commercial uses; however, some of this space was converted into residential use some years ago.

- 2.7 As noted above, Bakers Road provides access to the Bus Station, and contains a number of bus stops. Collectively these create a busy, trafficked environment.
- 2.8 To the south of the site is Cocks Yard which provides a pedestrian link between Bakers Road and High Street. On the other side of this thoroughfare is a two storey building which is currently occupied by Poundland. This is not within the applicant's ownership.

Table 2.1 – Site Location Plan



Source: Gaunt Francis Architects

- 2.9 Bakers House is a brick built building, pictured on the cover page of the DAS. It is understood that, whilst of a different design, Bakers House was constructed in the 1960s as part of the wider development of the 'island' site.
- 2.10 Whilst there are two small commercial frontages at ground floor level, the majority of this elevation comprises an access to the service yard, an access/ egress to the car park, and a separate egress from the service yard. This is explained in the diagram on page 19 of the DAS.
- 2.11 Therefore, the existing building has a limited ground floor footprint, with only the reception area for the offices and a separate retail unit (the two small commercial frontages). The office floorspace is largely contained at first and second floor levels comprising a bridge over the access and egress to the service yard and the

basement car park. Part of the existing building additionally forms a bridge over Cocks Yard. This is illustrated by the 3D view on page 15 of the DAS.

- 2.12 The offices have not been permanently occupied since 2012. Since then they have been marketed but, other than for a temporary letting, no occupiers have been found.

Basement Car Park

- 2.13 There is an existing basement car park below the site which comprises 112 parking spaces with a ramped access from Bakers Road. This car park was previously used to provide parking for the upper floor offices, but it is now used as a public car park – operated by Excell. Staircases provide access up to the High Street. The car park is unattractive and in need of upgrading.

Surrounding Area

- 2.14 The High Street frontage to the island site forms part of the Primary Shopping Area of Uxbridge Town Centre, and connects to the Pavilions and The Chimes centres. The Pavilions, opposite the western frontage of the Island site, contains residential units above (up to 8 storeys high).
- 2.15 Belmont Road is more secondary in character and function.
- 2.16 To the east, opposite Baker's House are a number of large properties that comprise residential, office and hotel uses. These buildings vary between five and nine storeys.

Heritage Considerations

- 2.17 The Site is not listed nor within a Conservation Area. However, as the Heritage Statement explains, there are Conservation Areas immediately to the north of the Island Site, and a short distance to the south of it. The underground station is a listed, and that Statement identifies other listed buildings in the vicinity of the application Site.

Accessibility

- 2.18 Bakers Road is a busy vehicular route, taking buses to and from Uxbridge bus station and service vehicles into and out of the various commercial developments, including into the retail service yard below 25 Bakers Road. Car drivers use Bakers Road to access the underground car park below 25 Bakers Road.
- 2.19 Pedestrians use Cocks Yard as a connection between High Street and the bus station. There is a small take-away half way along Cocks Yard.

- 2.20 Pedestrians on Belmont Road can use Bakers Road to access to the bus and underground stations, as well as the residential and commercial buildings along Bakers Road, including the existing Travelodge hotel close to the bus station.

Planning History

- 2.21 We are not aware of any relevant planning history related to a redevelopment of part of the islands Site.

3.0 Pre-Application Discussions

- 3.1 Following the vacation of the offices in Bakers House in 2012, there have been a number of discussions with Officers regarding the potential to redevelop the Application Site, as well as other parts of the wider Island Block. Details of the initial discussions are set out on page 22 of the DAS.
- 3.2 The most directly relevant pre-application discussions took place in 2017, which concerned a scheme for the redevelopment of the Application Site (and not the wider site) for a hotel development. A package was submitted to Hillingdon by Montagu Evans in March 2017, which was discussed at a meeting on 26 April and addressed in a letter from Mandip Malhotra of 10 March 2017. That scheme concerned a 117 room hotel on the Bakers Road frontage, and not on land immediately west of it within the service yard which is now the subject of the current Application. The hotel was to be 12 storeys high – images of it are set out on page 23 of the DAS.
- 3.3 Officers advised that the Site occupies a strategically important location within the Town Centre, fronting onto the bus interchange area, providing a significant opportunity to revitalise this part of the centre. It was recognised that the scheme had the potential to attract further investment (in the Island block) in accordance with the London Plan, and that the proposal is supported in principle as it provides a suitable town centre use in a sustainable town centre location.
- 3.4 However, Officers were concerned about the height, massing and overall design of the scheme relative to the heritage assets of the area. They suggested that the height of the building should be stepped down in scale towards High Street the bulk of which should ideally be between 5-6 storeys above ground with potential for a partial set back 7th floor. The highest elements should be closest to the taller elements along Bakers Road which Officers believed to be a maximum of 9 storeys high. Officers requested a views analysis statement to be submitted with any planning application to assess the impact of any development on sensitive locations; suggested locations were identified in the letter.
- 3.5 Finally, the detailed design was recognised to be important with officers seeking a less solid, more contemporary design, with more traditional materials, such as brick, render or stone, which are found in the town centre.
- 3.6 Advice as also provided in relation to amenity, highways, drainage, crime prevention, contaminated land, air quality, energy and sustainability as well as planning obligations and CIL.
- 3.7 The written advice concluded that:-

“The principle of the proposed redevelopment of the site is considered acceptable in this sustainable location within the town centre. As part the discussion at the meeting, there is work to be done in terms of justifying the increase in scale, massing and height. The proposed development ought to be read as a transition between the scale of the High Street and the

peripheral area and the relationship between the proposed development and the setting of the listed buildings and the conservation area requires further thought.”

- 3.8 In response to this pre-application advice a number of alterations were made to the scheme including the reduction in the overall height of the building.

Community Consultation

- 3.9 As set out in the submitted **Statement of Community Involvement** a public exhibition took place on 19 July 2018 in Uxbridge Town Centre. Around 190 people attended the event. Of the feedback obtained 93% was in support of the proposed development, the key themes of the feedback were:

- The Bakers House side of Bakers Road is badly in need of regeneration and investment;
- The proposed site is a great location for a hotel to support businesses, residents and University students alike;
- The Premier Inn brand is desirable and appropriate; and
- Job creation will be welcome.

- 3.10 Visitors to the exhibition raised no concerns regarding the proposed height or mass of the proposed building.

4.0 The Proposed Development

- 4.1 The proposed development seeks the demolition of the existing building fronting Bakers Road and the return to Cocks Yard. A new building will then be constructed largely above ground level so that the existing vehicular access into the service yard and into the basement car park can remain.
- 4.2 The scheme comprises a new-build hotel of 140 bedrooms based upon a ground floor lobby, providing access to the first floor reception, restaurant and to seven rooms. There are six full floors above this (levels 2-7) each with 20 rooms, and a partial floor (level 8) with 13 rooms, and plant above. This amounts to eight full floors and one partial floor. A summary of the proposed development is set out in **Table 3.1** (below).
- 4.3 The new building is pulled back from its existing boundary on the east side of Cocks Yard, so that there is a significantly better northern entrance to it. The main entrance to the hotel, located adjacent to Cocks Yard, is glazed. A distinctive design approach has been taken to the restaurant on the first floor, which also has a fully glazed façade so that diners can look out over Bakers Road.
- 4.4 The separate self-contained ground floor retail unit helps to animate the Bakers Road frontage.
- 4.5 All servicing to the new building will be carried out from within the site's central service yard.

Table 3.1: Proposed Development

Floor	Use	Number of Rooms
Basement	Car Parking. Lift lobby from car parking to upper floors. Plant room	-
Ground	Lift lobby to upper floors. Refuse, back of house, storage. Retail unit.	-
First	Reception, restaurant, back of house, rooms	7
Second	Rooms	20
Third	Rooms	20
Fourth	Rooms	20
Fifth	Rooms	20
Sixth	Rooms	20
Seventh	Rooms	20
Eighth	Rooms	13
Ninth	Plant room	-
Total		140

- 4.6 The proposed mix of room types is set out in **Table 3.2** (below). The scheme has been designed in accordance with the requirements of the London Plan and provides 10% of the rooms as accessible rooms.

Table 3.2: Proposed Mix of Room Types

Type	Number	%
Universal Access (Disabled / Wheelchair Access)	7	5
Easy Access (Ambulant Disabled)	7	5
Quad Bedroom	80	57
Triple Bedroom	43	31
Total	140	100

Premier Inn

- 4.7 The proposed hotel will be operated by Premier Inn. Premier Inn is consistently rated the UK's Best Value Hotel Chain by YouGov. With 785 hotels and more than 72,000 bedrooms across the UK and Ireland, Premier Inn is the nation's biggest hotel brand. It offers leisure and business travellers alike quality accommodation in convenient locations at affordable prices.

Job Creation

- 4.8 Premier Inn Bakers Road is expected to generate 45 new jobs. The company actively seeks to fill half of its new roles with those not in employment, education or training, particularly from the 16 – 24 year age group. Recruitment will be through the local Job Centre Plus three months prior to opening.
- 4.9 More generally, hotels function as part of the soft infrastructure in an area, which helps assist meeting the needs of local businesses – for them to thrive.
- 4.10 Premier Inn invests significantly in training and development programmes that help its people build their skills and careers. It also seeks to recruit from within the business to create long-term opportunities for employees.

Detailed Design

- 4.11 External materials on the Bakers Road and Cocks Yard frontages will be facing brick (two colours) with coloured aluminium windows. Feature columns at ground floor will be coloured. The key elements of the proposal are:
- A new block fronting Bakers Road that helps maximise the street frontage with active uses, including the new hotel reception area and a small separate retail unit.
 - All development over Cocks Yard avoided, so helping to significantly improve the northern entrance to Cocks Yard.
 - A more vertically fashioned design, avoiding the dull horizontality of the existing building.

- A good and beverage offering in the hotel, but not a significant one that might compromise similar establishments in the town centre (only breakfasts and lunch).
- Soft landscaping introduced where none presently exists.
- The existing central retail service yard hidden from view.
- The boarded up retail units on Cocks Yard removed and a new building to replace them.
- New public realm treatment to Cocks Yard and the hotel frontage.

4.12 Further details can be found in the submitted **Design and Access Statement**.

Sustainability and Energy Efficient Design

- 4.13 The proposed building has been designed, in part, to reduce the energy demands and CO₂ emissions of it.
- 4.14 The investigation of CO₂ emissions savings involved the analysis and simulation of energy efficiency measures, CHP, air source heat pumps and solar PV.
- 4.15 A number of energy efficiency measures are proposed to which are predicted to provide a 10.3% reduction in CO₂ emissions over the target emissions rate. The application is accompanied by an **Energy Strategy** has been prepared by Applied Energy Ltd.
- 4.16 CHP is included in the proposed development as the most suitable solution to provide decentralised energy for the hotel. The onsite electricity generated and 'free heat' obtained from the CHP will provide a proportion of domestic hot water demand for the hotel which will reduce CO₂ emissions.

Landscaping

- 4.17 Landscape proposals have been prepared by Davies Landscape Architects working within the constraints of this urban site. It is proposed to incorporate a number of trees in planters along Bakers Road, having regard to the presence of access and egress to the service yard and basement car park. Regard has also been had to the requirement to maintain the free flow of pedestrians along Bakers Road. It is also proposed to include planters along Cocks Yard in order to improve the overall appearance of this pedestrian thoroughfare.
- 4.18 The footprint of the new building and the aim of maximising its frontage, means there is little scope for soft landscaping, and the extent of the basement car park means there are no options for mature tree planting in the ground.
- 4.19 High quality new paving is proposed to the pavement in front of the building and to Cocks Yard reflecting the design rationale and materials for the proposed High Street enhancement works. Soft landscaping comprising of semi-mature clear stem trees in

architectural pots under planted with aromatic plants located along the street frontage retaining natural surveillance down Cocks Yard and along Bakers Road.

- 4.20 The proposed development has incorporated landscaping as far as possible within this urban site. A number of planters are proposed along Bakers Road.
- 4.21 The proposed hotel will help to give Bakers Road and Cock's Yard fresh street appeal, with a contemporary façade, external lighting and landscaping all designed to not only look good but to discourage anti-social and criminal behaviour.
- 4.22 A green roof is proposed on part of the flat roof facing Bakers Road. Sedum roofs have a range of benefits, particularly within an urban environment. As well as proving an attractive and long lasting alternative to conventional roofing, they provide highly beneficial habitat opportunities for birds and insects and improve air quality.
- 4.23 The sustainability benefits include a significant reduction in the surface water run off of rainfall (a mechanism for SuDS) as well as reducing the heat created from urban environments. Green Roofs can also reduce the need for air conditioning in summer, and provide a degree of insulation in winter.

Car Parking Spaces

- 4.24 The car park originally served the office building, but now provides 87 spaces to the public and 25 to local businesses. A total of 50 parking spaces will be assigned to the hotel. **Table 3.3** (below) provides details of the mix of spaces that will be provided.

Table 3.3: Car Parking Spaces

Type	Number
Standard	35
Disabled	5
Electric Charging	10
Total	50

Cycle Parking Spaces

- 4.25 15 staff cycle parking spaces will be provided within the basement.

Servicing and Refuse Arrangements

- 4.26 The proposed development will be serviced via the existing service yard area located to the rear of the building. A secure refuse area for the proposed development is included within this service yard area and refuse will be collected by the appointed contractor.

5.0 Planning Policy

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

5.2 The development plan for the purposes of this application comprises:

- London Plan (March 2016);
- Local Plan Part 1 Strategic Policies (November 2012); and
- Hillingdon Unitary Development (1998) Saved Policies.

5.3 Material considerations include:

- The National Planning Policy Framework (NPPF) 2018;
- Draft London Plan 2018;
- Hillingdon Local Plan Part 2 Development Management Policies (submitted for Examination 18 May 2018);
- Hillingdon Local Plan Part 2 Site Allocations and Designation Policies (submitted for Examination 18 May 2018).

5.4 The Examination of the Local Plan Part 2 Documents took place in August 2018. The NPPF advises that weight may be given to policies in emerging plans dependent on the stage of preparation that it has reached, the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies to the Framework¹.

5.5 Given that the Local Plan Part 2 was submitted for examination in May 2018 it will be assessed against the previous NPPF².

Decision Making

5.6 **Paragraph 8** of the NPPF advises that sustainable development comprises economic, social and environmental objectives, **paragraph 10** confirms that there is a presumption in favour of sustainable development at the heart of the Framework, which is reiterated in **paragraph 11** for decision-taking.

5.7 **Paragraph 38** of the NPPF states that Local Planning Authorities should approach decisions on proposed development in a positive and creative way, using the full range of planning tools available.

¹ Paragraph 48

² Paragraph 214

Principle of Development

- 5.8 London Plan **Policy 4.5** states that London's visitor economy should be supported taking into account the needs of business as well as leisure visitors through seeking to improve the range and quality of provision, especially in outer London, with at least 40,000 net additional hotels bedrooms being provided by 2036. Strategic **Policy E2** promotes employment growth in Uxbridge Town Centre, including through a minimum of 3,800 additional hotel rooms. UDP **Policy T2** encourages the provision of a range of accommodation on sites which are accessible from underground stations where development does not conflict with the aim to maintain and improve the environment.
- 5.9 **Policy E4** of the Local Plan Part 1 aims to strengthen Uxbridge Town Centre as a suitable location for hotels. **Policy T4** of the UDP promotes such uses in a mixed use areas, near an underground station, where the development does not result in the loss of amenity to neighbours and where parking standards can be met. Draft **Policy DME5** seeks a high standard of design, accessible layouts and rooms and schemes that are acceptable in terms of amenity and transport considerations.
- 5.10 Draft **Policy SA26** of the Site Allocations Plan identifies the site as part of a wider development site that is identified as suitable for a residential-led mixed use development, other main town centre uses such as leisure uses may be acceptable on upper floors. **Paragraph 85** of the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaption.
- 5.11 **Policies 2.6** and **2.7** of the London Plan states that the potential of outer London should be realised through recognising and building on the diversity and strengths through providing a locally sensitive approach. **Policy 4.1** of the London Plan requires the continued development of a strong and increasingly diverse economy across all parts of London.
- 5.12 **Policy 4.7** of the London Plan states that development in centres should be in accordance with the scale of the centre and its catchment area. **Paragraph 118** of the NPPF states that decisions should be taken that make the effective use of land through proposals including mixed-use, promotion of under-utilised land and buildings and supporting upward extensions where relevant. **Paragraphs 127** and **131** of the London Plan set out the considerations that should be given to the design of new buildings to ensure that the design optimises the sites potential.
- 5.13 **Policy BE26** of the UDP (1998) and **Policy DMTC1** of the Emerging Local Plan Part 2 DMP require new buildings to reflect the overall scale and character of town centres as a focus of shopping and employment activity.

Design

- 5.14 London Plan **Policy 7.4** states that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. **Policy 7.6** requires architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 5.15 UDP **Policies BE15, BE18 and BE26**, Strategic **Policy BE1** and draft **Policies DMHB11 and DMHB12** set out the requirements for the design of new buildings and surrounding areas and require all new development to improve and maintain the quality of the built environment.

Tall Buildings

- 5.16 London Plan **Policy 7.7** states that applications for tall buildings should include an analysis addressing the criteria of the following policy. Tall buildings should:
- a) Generally be limited areas such as town centres that have good access to public transport;
 - b) Not adversely affect the character of an area by the scale, mass or bulk of the building;
 - c) Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - d) Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate;
 - e) Incorporate the highest standards of architecture and materials;
 - f) Have ground floor activities that provide a positive relationship to the surrounding streets;
 - g) Contribute to improving the permeability of the site and wider area;
 - h) Incorporate publicly accessible areas on the upper floors, where appropriate; and
 - i) Make a significant contribution to local regeneration.
- 5.17 Tall buildings should not:-
- Affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference;
 - Impact on local or strategic views adversely.
- 5.18 The impact of tall buildings proposed in sensitive locations, such as conservation areas, should be given particular consideration.

- 5.19 Strategic **Policy BE1** states that tall buildings should not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. “*Outside of Uxbridge and Hayes town centres, tall buildings will not be supported*”. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.
- 5.20 Emerging **Policy DMHB10** requires proposals for a high buildings or structures to respond to the local dominant context and satisfy a range of criteria including being located in Uxbridge town centre, in an area of high public transport accessibility, be of a scale proportionate to its location and be of a high architectural quality.

Heritage

- 5.21 **Paragraph 189** of the NPPF states that the significance of any heritage assets should be described in any submission. London Plan **Policy 7.8** states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. The same policy, as well as draft **Policy DMHB7**, set out requirements for sites of archaeological interest.

Access for People with Disabilities

- 5.22 **Policy 4.5** of the London Plan states that 10% of new hotel rooms should be wheelchair accessible this is re-iterated in draft

Sustainable Design

- 5.23 **Policy 5.9** of the London Plan requires major development proposals to reduce the potential for overheating and reliance on air condition systems through adopting a cooling hierarchy.
- 5.24 Strategic **Policy EM1** sets out the process that the Council will adopt to ensure that climate change mitigation is addressed at every stage of the development process including prioritising higher density development in town centres that are well served by sustainable forms of transport, ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market and giving preference to the development of previously developed land.

Amenity

- 5.25 London Plan **Policy 7.6** states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing wind and microclimate. Strategic **Policy EM8** seeks to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Highways

- 5.26 **Paragraph 109** of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.27 Developments that generate significant amounts of movement should be supported by a Transport Assessment to consider the likely impacts of the proposal, and should provide a Travel Plan, in accordance with the NPPF **Paragraph 111**. London Plan **Policy 6.3**, as well as **Policies AM2** and **Policy DMT2** require development proposals to be assessed in terms of the contribution of traffic generation, their impact on congestion as well as transport capacity and the transport network. Development should not adversely affect safety on the transport network.
- 5.28 UDP **Policy AM1** and draft **Policy DMT1** require development that will draw from more than a walking based catchment area to be accessible by public transport. **DMT4** promotes the enhancement of public transport facilities where required for the acceptability of the proposal.
- 5.29 **Paragraphs 105 and 106** of the NPPF state that local parking standards should be set having regard to the type and location of development, and that maximum parking standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network. London Plan **Policy 6.13** includes maximum parking standards to be used as the basis for considering planning applications. UDP **Policies AM14 - 16** seek parking in accordance with adopted standards, including for disabled persons.
- 5.30 Safe, direct and inclusive access for pedestrians and cyclists should be provided to connect schemes to the wider network (draft **Policy DMT5**).

Sustainable Urban Drainage

- 5.31 **UDP Policy OE8** requires that new development does not increase flood risk elsewhere due to additional surface water run-off. Draft Policy **DMEI10** requires new build development to include a drainage assessment and demonstrate that appropriate sustainable drainage systems have been incorporated in accordance with the London Plan hierarchy.
- 5.32 London Plan **Policy 5.13** requires sustainable urban drainage systems, aiming to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Crime Prevention

- 5.33 Draft **Policy DMHB15** seeks safe and attractive public and private spaces with all new development, providing good design and creating inclusive environments.

London Plan **Policy 7.3** aims to reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

Contaminated Land

- 5.34 Strategic **Policy EM8** requires that development on contaminated land provide mitigation strategies and reduce the impacts on surrounding land uses.

Air Quality

- 5.35 London Plan **Policy 5.10** requires development to integrate green infrastructure in the design process to contribute to urban greening. Strategic **Policy EM8** requires that development does not deteriorate the local air quality. Draft **Policy DMEI14** seeks reductions in emissions to contribute towards meeting EU limit values and national air quality objectives.

- 5.36 **Policy DMEI1** seeks living roofs in development to be provided within Air Quality Management Areas.

Renewable Energy / Sustainability

- 5.37 London Plan **Policy 5.2** requires non-domestic buildings to reduce carbon dioxide emissions in accordance with building standards. **Policy 5.3** requires that major development proposals meeting the minimum standards set out in the Mayor's SPG. **Policy 5.7** states that major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation where feasible.

- 5.38 Draft **Policy DMEI2** requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved.

Water Conservation

- 5.39 London Plan **Policy 5.15** states that development should minimise the use of water mains by incorporating water saving measures and equipment. Draft **Policy DMEI10** also requires all new development to include water efficiency measures including the collection and reuse of rain water and grey water.

Planning Obligations and CIL

- 5.40 The Council has a CIL Charging Schedule (adopted July 2014). UDP **Policy R17** states that planning obligations will be used, where appropriate, to provide necessary facilities required by development proposals. Details are provided in the Planning Obligations SPD (July 2014).

6.0 Assessment against Planning Policy

Principle of Development

- 6.1 Uxbridge is recognised as a Metropolitan Centre in the London Plan, with a number of major employers in the area including Canon EMEA, Xerox and Coca Cola Europe. These, and other local businesses, will benefit from Premier Inn's good quality offer and ability to attract substantial numbers of business and leisure visitors each year. On average 60 – 70% of Premier Inn guests eat, drink and seek entertainment outside of their hotel in the evening, which will create opportunity for the local economy.
- 6.2 The provision of a 140 bedroom hotel in Uxbridge Town Centre accords with **Policies 4.5 and 4.7** of the London Plan, and strategic Hillingdon **Policy E2**, both of which seek a minimum provision of further hotel rooms. The economic benefit will help Uxbridge to realise the potential of the centre, and create a strong and diverse economy, in accordance with **Policies 2.6, 2.7 and 4.1** of the London Plan.
- 6.3 The redevelopment of Bakers House, as a rundown site well related to the underground station, also results in compliance with **Policy T2**.
- 6.4 Whilst the scheme is not a residential led mixed use development, in terms of draft **Policy SA26**, the proposed hotel development will strengthen the role of Uxbridge Town Centre by providing employment and attracting visitors, who should use other nearby facilities such as café and restaurants, in accordance with the **NPPF³** and **Policy E4**.
- 6.5 Furthermore, the proposed development is a suitable town centre use in a sustainable town centre location in accordance with **Policy T4**. It is close to an underground station, will not harm residential amenity and can provide car parking from existing spaces under the building.
- 6.6 Finally, in terms of **Policy DME5**, the scheme will be well designed for the location (see below), with an accessible layout (including 10% of rooms with wheelchair access) and provision of a suitable amenity (again see below).

Design

- 6.7 Following the pre-application advice received from the Council, the height of the proposed building has been reduced to a level that is of a more comparable height to the buildings within this part of the town centre and on the opposite side of Bakers Road in accordance with **Policy BE15** of the UDP (1998).
- 6.8 The location of it is within Uxbridge Town Centre in accordance with criteria 11 of Policy BE1. Furthermore, in terms of London Plan **Policy 7.7**, it is in a town centre

³ Paragraph 85.

very close to public transport. The location of it is well related to other tall buildings in Uxbridge in terms of character. The scheme will have a high standard of architecture, and will relate well to the urban grain of the area. The improved public realm along Cocks Yard will improve the legibility and permeability of an area. Opportunities for ground floor access and uses have been taken where this is possible. Overall the application scheme will make a significant contribution to the regeneration of the local area.

6.9 The townscape assessment shows that the proposed development will relate well to the mix of buildings within Uxbridge Town Centre.

6.10 **Strategic Policy BE1** sets out a range of criteria against which new development should be assessed. The relevant parts of this policy and assessment are set out in **Table 5.1** (below).

Table 5.1: Assessment against Policy DMB10

Policy BE1 Criteria	Assessment
Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place	The proposal adopts a high quality of design which contributes to creating a sense of place in this location. Further details can be found in the submitted Design and Access Statement .
Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties	The building responds to the height of the existing buildings on Bakers Road and will make a positive contribution to the local area.
Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance	The overall appearance of the street scene along Bakers Road and Cocks Yard will be improved as a result of the proposed development.
Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services	The proposed development utilises the existing network of routes and enhances the Cocks Yard pedestrian link from Baker Road to High Street
Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art	The public realm has been enhanced as far as possible given the constraints of the site. A green roof has been included.
Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having	The development has been designed to incorporate secure by design principles by ensuring that parking areas are secure

Policy BE1 Criteria	Assessment
regard to Secure by Design standards and address resilience to terrorism in major development proposals	and there are good levels of natural surveillance.
Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas	The application does not result in the loss of any gardens or green space.
In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape	The proposed development is located in Uxbridge town centre which is recognised as a suitable location for tall buildings. The height of the building has been reduced following pre-application discussions with the Council and is comparable to the height of the existing buildings on Bakers Road.

- 6.11 The proposed development is in accordance with **Policy BE1** of the Local Plan Part 1 Strategic Policies.
- 6.12 The building has been designed so that there are active frontages along Bakers Road and Cocks Yard to improve surveillance and enhance pedestrian safety in accordance with **Policy BE18** of the UDP (1998).
- 6.13 The scale, mass and orientation of the building is in accordance with **Policy BE26** of the UDP (1998), **Policy 7.4** of the London Plan and **Policy DMHB11** of the Emerging Local Plan Part 2 DMP. The building has been designed to make a positive contribution to a coherent public realm in accordance with **Policy 7.6** of the London Plan and **Policy DMHB12** of the Local Plan Part 1 Strategic Policies.
- 6.14 **Policy DMB10** of the Emerging Local Plan Part 2 DMP is also a criteria based policy relating to high buildings and structure. **Table 5.2** (below) sets out the relevant criteria and assessment.

Table 5.2: Assessment against Policy DMB10

Policy DMHB10 Criteria	Assessment
Be located Be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings	The site is located within the designated Uxbridge town centre.
Be located in an area of high public transport accessibility and be fully accessible for all users	The site has a PTAL rating of 6a and is highly accessible by public transport.
Be of a height, form, massing and footprint	The height of the building has been reduced

Policy DMHB10 Criteria	Assessment
that is proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views	following pre-application advice from the Council and respects the height of the existing buildings on Bakers Road.
Achieve high architectural quality and include design innovation. Consideration should be given to its silhouette, so that it provides a positive contribution to the skyline, its design at street level, facing materials and finishes, lighting and night time impact	The building has been designed to make a positive contribution to the street scene. Further details are set out in the submitted Design and Access Statement .
Not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces	The proposed building should not adversely affect the local microclimate. The footprint of it relates to the existing street pattern albeit that the building is taller than the existing one.
Be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities	The proposed development will enhance this currently boarded up site and provide improvements to the environment as well as creating job opportunities.
Comply with aviation and navigation requirements and not adversely impact upon telecommunication, television and radio transmission networks	We are not aware of any potential effect of the development on telecommunications or related equipment.
Demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes.	The development respects the existing built development in the area and does not affect existing pedestrian routes.

6.15 **Paragraph 189** of the NPPF states that the significance of any heritage assets should be described in any submission. **Policy DMHB7** requires that sites of archaeological interest are not disturbed.

6.16 Whilst the site is located within the Uxbridge Town Archaeological Property Area, it does not contain any statutorily designated assets such as schedule monuments or listed buildings.

6.17 The site has low archaeological potential within the footprint of the existing basement as this is expected to have completely removed all archaeological remains within its footprint. The most significant impact of the proposed development will be the installation of new pad foundations at ground floor level within an area of the site which has not been basemented. These will remove any archaeological remains within their footprint and potentially cut into the underlying gravels.

6.18 Given that most of the archaeological remains within the site are likely to have been removed by the existing basement, it is recommended that a targeted watching brief

be undertaken during the installation of the new pad foundations at ground level, and during works below the existing basement slab level, to ensure that no surviving archaeological remains are removed without record.

- 6.19 Such work would be undertaken in accordance with a Written Scheme of Investigation agreed with the archaeological advisor to the Borough of Hillingdon and carried out under the terms of a planning condition.

Access for People with Disabilities

- 6.20 The main hotel entrance will be at grade with Bakers Road, and lifts within the entrance hall (Part M compliant) will take customers up to the hotel reception at first floor. The main external doors (ground and basement) will be fitted with AV access control for those just arriving, and can be key fob operated for customers already checked in. Customers arriving by car will use the dedicated ramp accessed off Bakers Road to take them down into a parking space in the basement (50 spaces allocated to the hotel incl. 10% DDA compliant) from where they can make their way into the main lift at that level, and up to reception at first floor. This lift will not travel above first floor, protecting security to other hotel users. The proposed development is in accordance with **Policy 4.5** of the London Plan and **Policy DME6** of the Emerging Local Plan Part 2 DMP.

Sustainable Design

- 6.21 The proposed building has been thermally modelled, which has determined the annual energy demands and quantifies the reductions in energy use and CO₂ emissions as a result of energy efficiency improvements that have been selected.
- 6.22 Solar photovoltaic panels will be installed on the flat roof of the building, to generate electricity and offset energy that would have been taken from the grid.
- 6.23 In accordance with **Policy EM1** of the Local Plan Part 1 (2012) climate change mitigation has been adopted at the outset of the design process. This has resulted in an improvement in the building's energy performance, over and above the minimum levels stipulated within Part L of the Building Regulations.
- 6.24 **Policy EM1** of the Local Plan Part 1 (2012) sets out the process that the Council will adopt to ensure that climate change mitigation is addressed at every stage of the development process including prioritising higher density development in town centres that are well served by sustainable forms of transport, ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market and giving preference to the development of previously developed land.

- 6.25 **Policy 5.9** of the London Plan requires major development proposals to reduce the potential for overheating and reliance on air condition systems through adopting a cooling hierarchy.
- 6.26 The proposed development is located in a highly sustainable location, within Uxbridge Town Centre, very close to public transport. It re-uses existing car parking. The building and related use have been designed to minimise energy requirements, as set out in the submitted **Energy Statement**.

Amenity

- 6.27 In pre-application discussions the Council accepted that the proposed hotel raised limited amenity issues in its own right.

Highways

- 6.28 The application is accompanied by a **Transport Assessment** and **Travel Plan** prepared by David Tucker Associates.

Traffic Generation

- 6.29 The submitted **Transport Assessment** demonstrates that the proposed development is estimated to generate in the region of 22 and 13 trips during the am and pm peak hours respectively. This is just over one vehicle every two to three minutes. Even without discounting the trips that could be generated by the existing office use, this is not significantly and is well within daily variations of background traffic flow on the local network.
- 6.30 The **Transport Assessment** has assessed the impact of the traffic generation of the proposed development on the transport network and concluded that it will only give rise to a modest number of trips during the peak hour periods in accordance with **Policy 6.3** (Assessing effects of development on transport capacity) of the London Plan.

Public Transport Accessibility

- 6.31 The site has a PTAL level of 6a. There are a number of bus services that can be accessed locally. The nearest bus stops are around 20m to the south of the site on Bakers Road. There are more stops around 50m to the south of the site at the frontage to Uxbridge Bus Depot. There are regular bus services to locations including Slough, Iver Heath, High Wycombe, Beaconsfield, Chesham, Ruislip, Harlow, Heathrow Airport, Hounslow and Ealing. A full list of the bus services available are set out in the **Transport Assessment**.
- 6.32 The closest underground railway station is Uxbridge Underground Station approximately 60m south east of the site on Bakers Road, a walk time of

approximately one minute. The station is the terminus of the Piccadilly Line and the Uxbridge branch of the Metropolitan Line.

- 6.33 The location of the site is therefore well located relative to existing public transport in accordance with **Policy AM1(ii)** and **Policy AM2(ii)** of the Hillingdon UDP (1998).

Pedestrian and Cycle Routes

- 6.34 The majority of local roads have pedestrian walkways with raised kerbs, pedestrian crossings, streetlights and 30mph speed limits. High Street to the west of the site is entirely pedestrianised. There is an unbroken link from the site to the local bus stops and underground station. The footway network is important to the site as it allows for better pedestrian integration to the surrounding area, and access to local facilities, bus and train services.
- 6.35 To the south of the site Cocks Yard provides a pedestrian route through beneath the existing office building from Bakers Road to the pedestrian area on the High Street.
- 6.36 Short trips can be made by cycle rather than car, particularly for hotel staff. The 5km radius area encompasses a large number of residential areas. London benefits from an extensive network of local cycle routes. The roads around the site have excellent street lighting and 30mph speed limits. Cycling is therefore a viable form of transport to and from the site.

Car Parking

- 6.37 The site benefits from an existing basement car park which will be retained as part of the development. Fifty of the car parking spaces will be leased to Premier Inn in conjunction with the proposed use of the site.
- 6.38 Based on the sites PTAL level of 6a the provision of 50 car parking spaces in association with the proposed hotel use is in accordance with **Policy 6.13** (Parking) of the London Plan and **Policy AM14** and **Annex 1** of the Hillingdon UDP (1998).
- 6.39 The site has a PTAL level of 6a and therefore in accordance with **Policy 6.13** (Parking) of the London Plan provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries / servicing.

Coach Parking

- 6.40 **Policy 6.13** (Parking) of the London Plan requires the provision of one coach parking space for every 50 rooms for a hotel. Due to the town centre location of the site and the PTAL level of 6a no coach parking at the site is being provided as part of this development.

Cycle Parking

- 6.41 Provision for cycle parking will be made within the basement car parking area. This will comprise cycle parking for both staff and visitors.

Servicing

- 6.42 Servicing of the hotel will be via the main central retail servicing yard. Linen drop and collection will be trolleyed via a ramp from the dedicated linen store at the back of the ground floor. Refuse for the hotel is stored in a separate bin store at the rear of the ground floor retail unit.

Other

Sustainable Urban Drainage

- 6.43 The submitted **Drainage Strategy** contains further details with regard to the correspondence with Thames Water and the detailed assessment undertake with respect to the surface water run-off rates.
- 6.44 The site is currently completely covered in impermeable surfaces, surface water discharge from the existing site is currently unrestricted. The site is completely urban in its nature and is sited within a developed town centre environment. In terms of the SuDS hierarchy there is, therefore, no opportunity to provide open attenuation storage, infiltration systems or to discharge to open watercourse; discharge to the public sewer being the only practical option for surface water drainage from the site.
- 6.45 Small areas of “green roof” will be provided on the hotel to effect some slow-down in, and treatment for, surface water run-off from rainwater collecting on the building. In addition surface water will be treated using a proprietary treatment system located in the vicinity of the proposed attenuation tank. The attenuation tank will sit directly on the basement floor slab and will discharge via a restricted orifice plate, into the nearest existing manhole on the existing surface water system.
- 6.46 Flow is to be attenuated to a practical minimum limit of 2.5 litres / second and the attenuation design is based on this minimum discharge rate and a 1 in 100 year design storm plus an allowance of 40% to account for climate change in compliance with stated policy.
- 6.47 Confirmation has been obtained from Thames Water that in terms of the capacity in their assets, there is sufficient capacity in both the public foul and surface water sewers to accommodate the proposed development in accordance with Policy
- 6.48 The design of the new surface water drainage and attenuation system will be based on the following criteria:

- Drained area to be attenuated – circa 700 sq m, the plan area of the proposed hotel building.
- Permitted rate of discharge of surface water from attenuated area – 2.5 litres / second.
- Design storm system and attenuation – 1 in 100 years plus 40% for climate change.

6.49 The submitted Drainage Strategy demonstrates that the proposed development will not increase flood risk elsewhere due to additional surface water run-off in accordance with **Policy OE8** of the UDP (1998), **Policy DMEI10** of the Emerging Local Plan Part 2 DMP and **Policy 5.13** of the London Plan.

Crime Prevention

6.50 The bin store is located within the existing service yard area to the rear of the building. It has been located such that it does not block site lines or provide a refuge for anti-social behaviour.

6.51 As set out above the cycle parking is accommodated within the existing basement. This provides a secure location for the parking which will also be monitored by CCTV. Access to the basement parking area will be controlled.

6.52 As part of the development proposals the existing building that over sails Cocks Yard will be removed. This will improve the overall perception of this pedestrian route through to High Street, the increase in pedestrian activity in this location and natural surveillance will contribute to the sense of security without being overbearing or intimidating in accordance with **Policy DMHB15** of the Emerging Local Plan Part 2 DMP and **Policy 7.3** of the London Plan.

Air Quality

6.53 The application is accompanied by an **Air Quality Assessment** which considers the air quality impacts of both the construction and operational phase of development.

6.54 During the construction phase there is the potential for fugitive dust emissions as a result of demolition, earthworks, construction and track out activities to have an impact on air quality. It is considered that the use of good practice control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.

6.55 Vehicle exhaust emissions have the potential to impact on air quality. Air quality conditions at sensitive locations were assessed with and without the proposed development. Results were subsequently verified using local monitoring data. Further to this, dispersion modelling was undertaken in order to predict pollutant concentrations across the proposed site as a result of emissions from the highway network. A review of the dispersion modelling results indicated that predicted air

quality impacts as a result of traffic generated by the development were not significant at any sensitive location in the vicinity of the site. The proposed development is therefore in accordance with **Policies BE1** (Built Environment), **EM8** (Land, Water, Air and Noise) of the Hillingdon Local Plan Part 1 (2012) and **Policy DME114** of the Emerging Local Plan DMP.

- 6.56 In accordance with **Policy 5.10** of the London Plan and **Policy DME11** of the Emerging Local Plan Part 2 DMP a green roof has been incorporated to assist in urban greening and improving the local air quality.

Waste Management

- 6.57 Refuse storage areas are provided to the rear of the hotel within the existing service yard area. The refuse storage area has been dimensioned in order to accommodate sufficient bins to address the requirements of the occupier. The refuse storage area has been located in order to ensure that there is no detrimental impact on pedestrian movement and at the same time provide an accessible location for refuse service vehicles.

Renewable Energy / Sustainability

- 6.58 As Whitbread continue to open more coffee shops, hotels and restaurants, they are sensitive to the impact they have on the environment by reducing carbon emissions, being as energy efficient as possible, minimising water consumption and diverting waste from landfill. Whitbread have set themselves stretching targets to reduce carbon by 15%, water consumption by 20%, and directly increase their operations recycling rate to 80%.
- 6.59 Whitbread's product specific policies ensure they do not have a negative environmental impact on the planet, and the welfare of the animals in their supply chain is protected. They focus on the risks associated with sourcing each commodity, including deforestation, water use, chemical use, loss of biodiversity and the accreditation standards they have committed to under their 2020 target (reset in April 2015).

Energy

- 6.60 In order to minimise carbon dioxide emissions, the accompanying **Energy Strategy Report** explains the approach that has been taken in line with **Policy BE1** (Built Environment) of the Hillingdon Local Plan Part 1 (2012) and **Policy 5.2** (Minimising carbon dioxide emissions) of the London Plan. A number of energy efficiency measures are proposed as set out below to reduce energy demand for the building:

- High efficiency air source heat pumps;
- Energy efficiency lighting;
- Heat recovery ventilation to the guest bedrooms;

- Heat recovery ventilation to the public areas;
- Improved services distributions;
- Inclusion of variable speed drives on pumps and fans; and
- Water saving technologies.

- 6.61 The above energy saving measures are predicted to provide a 10.3% reduction in CO₂ emissions over the target emissions rate.
- 6.62 It was deemed that the inclusion of CHP was the most suitable solution to provide decentralised energy for the hotel. The onsite electricity generated and 'free heat' obtained from the CHP will provide a proportion of domestic hot water demand for the hotel which will reduce CO₂ emissions. The CHP helped the development achieve an estimated overall 30.2% reduction in CO₂ over the target emissions rate and is in accordance with **Policy EM1** (Climate Change Adaption and Mitigation) of the Hillingdon Local Plan (2012).
- 6.63 In accordance with **Policy 5.7** (Renewable Energy) of the London Plan on-site renewable energy options have been explored. The only suitable renewable technology that can be used in conjunction with the air source heat pumps and CHP is solar PV. It is proposed that a small array is installed on the south facing flat roof. The inclusion of solar PV reduced CO₂ emissions, and results in an estimated final total reduction of 38.7% against the 2013 baseline target emissions rate satisfying the London Plan 2016.
- 6.64 The proposed reduction in the baseline target emissions rate are in accordance with the requirements of **Policy 5.3** (Sustainable Design and Construction) of the London Plan and **Policies BE1** (Built Environment) and **EM1** (Climate Change Adaption and Mitigation) of the Hillingdon Local Plan (2012)

Water Conservation

- 6.65 All of the sanitary ware fitted within the hotel will be low flow / flush which is the standard approach of Whitbread. The kitchens will be fitted with Eco Dishwashers, which use a small amount of water which is continually recycled. These measures will reduce the water demand of the development during the operational phase.
- 6.66 Whitbread monitor their water consumption through a combination of automatic and manual meter readings to proactively locate and fix leaks across the estate. The

7.0 Summary and Conclusion

7.1 The proposed use is compatible with, and will help ensure the continued prosperity of its town centre location without compromising existing F&B outlets.

- The new building will replace an existing unloved vacant office with a contemporary design whose materiality is better suited to its location, and which will continue the recent improvements made to Bakers Road.
- Unlike the existing building, the main entrance will be highly glazed and will be brought forward to the street edge rather than being set back behind a shadowed forecourt.
- Cocks Yard will be opened up at its northern end, and landscaped, making it a more inviting thoroughfare.
- The retail service yard will be shut off from view with new gates.
- The existing second floor office space above WHSmith will be provided with an improved main entrance.
- The new first floor restaurant will offer an exciting, highly glazed active frontage to the street.

Appendix 1: Summary of Pre-Application advice received

Principle of Development	Whilst the site occupies a strategically important location within the town centre, it essentially fronts onto the bus interchange area, where there are limited primary retail units. The development does however present a significant opportunity to revitalise this part of the town centre. The development has the potential to attract further investment in the centre to promote further growth, as identified in Annex 2 of the London Plan. The proposal is supported in principle, as it provides a suitable town centre use in a sustainability town centre location.
Design	There would be no objection in principal to the demolition of the existing structure, which appears to have little historic or architectural interest. However, given the position of the site, adjacent to historically sensitive buildings and areas, the height, massing and overall design of any proposed structure would need to be carefully considered in order to avoid a negative impact on these features and their wider setting. In terms of height, any proposed building should step down in scale towards the High Street, the bulk of which should ideally be between 5 – 6 storeys about ground, although there may be scope for a partial and set back 7th floor. As noted at the meeting, it would be helpful to understand the context of other emerging proposals for adjacent sites. The highest elements, should, however, be positioned closest to the approved taller structures along Baker's Road, which we believe are a maximum of 9 storeys in height. These buildings should be shown in proposal drawings to allow a meaningful height comparison to be made. Twelve storeys as proposed is considered to be too tall for this location. Given the width of the site and the potential for the upper floors to be visible from sensitive locations within the town centre, a varied roofline should be considered. The impact of the height and massing of any proposal on sensitive locations should be fully considered in a views analysis in line with current good practice (see the documents noted on last page of this advice). These should cover winter and summer and also daylight/night time views. Viewing points have been marked up on the map below, the impact on medium and longer views from the main approach roads into the town centre and from adjacent open spaces will need to be considered (particularly from spaces to the west, north and east of the site). Locations

	to be considered should include the open space around New Denham and views from the M40, Hillingdon Station, Hillingdon Hill, Uxbridge Common and the former RAF Uxbridge site (Hillingdon House). In terms of detailed design, a building of outstanding contemporary design will be sought, although it will need to be appropriate to its location, particularly in terms of the materials used. Whilst the industrial heritage of the site can be celebrated, particularly with regards to visitor interpretation of the site, the materials should reflect the more traditional materials found within the town centre, ie brick/render/stone. At present the overall design of the elevations appears regimented and looks rather heavy and solid, ideally a design that incorporates more glazing and a more lively fenestration pattern/elevational detailing should be developed. The glazed restaurant feature is, however, welcomed. Plant, services and other elements such as PVs should be incorporated into the overall design of the structure. The building should have an active street frontage, although it is noted that this may be difficult to achieve given that the three existing access points are retained. Where possible, the frontage should incorporate as much glazing as possible and there may be potential to increase/extend these areas below the canopy. The elevation onto Cocks Yard should also include windows and access points to increase activity and encourage self policing along this footpath. The gates and shutters to the frontage access points need to be semi permeable in terms of visibility and could include design features to improve their appearance. Solid metal roller shutters should, for example, be avoided. The frontage could also be given a unified appearance through a carefully considered scheme of hard landscaping ie a shared surface using good quality modern materials. Where possible soft landscape should be included, in particular, tree planting on the frontage /pavement areas which would help in "greening" the street. The treatment of the underside of the canopy will be important, as will signage and lighting, which should be integrated with the design of the building. The site is located within an archaeological priority area, the applicant is advised to contact the Greater London Archaeology Advisory Service (GLAAS) before a detailed proposal is drawn. The London Borough of Hillingdon is committed to achieving the highest standards of access and inclusion. All buildings that are open to the must be constructed according to the policies and design details as outlined in the SPG Hillingdon Design and Accessibility Statement (HDAS) Accessible Hillingdon.' Officers expect sustainability considerations and servicing to be integrated into the design. This includes plant, life over runs, PVs, mechanical ventilation. Details of which should be provided when an application is made.
Amenity	Whilst the hotel proposals raise limited amenity issues in their own right, the applicants are advised to ensure that the proposals do not cause blight to their own site and those sites which surround it. This will be considered in more detail during the course of a planning submission.
Highways	Bakers Road has no on-street car parking but loading facilities do existing. The site has a PTAL value of 6a (excellent) as a result of bus and train services close by. The existing office use has an underground car park with 122 spaces with a ramped access from Bakers Road. Bakers Road and the surrounding area are subject to a CPZ. The on-site car parking will eventually require a Car Parking Management Plan to establish how car parking will be provided for guests / visitors / staff and other users of the wider block. It is unlikely that traffic generation will be a major issue with this development but this topic will be included in a Transport Assessment. Full details of the existing usage of the car park and the potential impact of some of these bays being dedicated to the hotel use will need to be set out in the TA.

	There will have to be secure cycle parking at least for employees along with a couple of motorcycle bays and EV charging. The existing basement access is being utilised so there is a need to treat the Bakers Road frontage and integrate with Town Centre schemes. The operation of hotel servicing needs to be identified in a Transport Assessment (TA) at the planning application stage along with other issues, and this should consider the site as a whole and the other users.
Sustainable Urban Drainage	All new development should incorporate sustainable drainage systems. The proposals need to include a clear drainage strategy that is reflected within the designs of the development. Policy 5.13 of the London Plan sets out a hierarchy to work towards, it also requires a greenfield run-off rate to be met. This means that simply suggesting that the run-off rate will not be increased is not sufficient. You will need to demonstrate a greenfield run-off rate in a 1:100 year (+ climate change) storm event. This needs to set out quantities of run-off and pre and post development and include the methods of attenuation to reduce it down to a greenfield rate. If infiltration methods of SUDS are proposed, you will need to demonstrate the receiving subsoils will be adequate. You will also need to set out adoption and maintenance regimes which may require consideration within a subsequent Section 106 legal agreement.
Crime Prevention	The design and layout should also have regard to secure by design principals. The siting of bin stores and secure cycle storage is fundamental to security. They should not block sight lines or provide refuges for anti-social behaviour. Cycle parking and refuse enclosures should be incorporated into the buildings where possible.
Contaminated Land	Applications for sensitive development should be supported by a desk top study confirming known or potential contamination issues.
Air Quality	The site is located within an Air Quality Management Area and as such, an air quality assessment should be provided as part of any application.
Waste Management	Policy 5.17 of the London Plan sets out the Mayors Spatial Policy for Waste Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. Accordingly it would be necessary for the development to provide adequate waste storage on site. Bin stores which should have external access. The facilities should be convenient for use and appropriate for servicing. Any refuse or recycling stores should be located within an appropriate distance of the vehicle collection point to enable easy servicing by refuse vehicles.
Renewable Energy / Sustainability	Applicants are advised to consult the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction.
Energy	The development needs to meet Policy 5.2 of the London Plan and set out a 35% reduction in CO2 emissions using 2013 Part L as the baseline. We would expect to see a full energy assessment which incorporates a strategy (or strategies) as to how the 35% reduction would be achieved. It is acceptable to set out a couple of different options for reaching the 35% reduction, provided that there is clear analysis of their applicability within the development. The 35% reduction must be set against a clearly defined 2013 Building Regulation baseline, measured in kWhr and KgCO2. This should be a total for the whole development. The designs of the development must clearly incorporate the identified measures. For example if PVs are proposed, we would expect to see a roof plan setting out the location, orientation, pitch and the appropriate amount.
Water Conservation	The Borough is in a seriously water stressed area and we would expect to see proposals that achieve 105 litre per person per day in accordance with Policy 5.15 of the London plan. We would also expect the initial proposals to demonstrate the inclusion of water collection and reuse measures to reduce the demand on potable water.
CIL	In accordance with Mayor of London and London Borough of Hillingdon rates.