



Land at 12-18 Pield Heath Road & 2 Pield Avenue, Uxbridge

Planning Supporting Statement (incorporating Statement of Engagement)

November 2024



Gillings
Planning

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Introduction

1.1 This Planning Statement (incorporating the SCI), prepared by Gillings Planning on behalf of Simply Develop (UK) Ltd (“the Applicants”), is submitted in support of an application for full planning permission for the following description of development:

“Demolition of 12 Pield Heath Road and construction of a care home (within Class C2), with access, car parking, electric vehicle charging, cycle parking, refuse storage, landscaping, amenity space, boundary treatments and other associated works.”

1.2 This Statement provides a planning analysis to demonstrate that the submitted proposals are acceptable in planning terms and in accordance with relevant planning policy and guidance.

1.3 **Table 1.1** opposite sets out the documents submitted in support of the planning application which should be read alongside this Planning Statement

Table 1.1: Schedule of Supporting Documentation

Document	Technical Consultant
Planning Application Form and ownership certificate	Gillings Planning
Planning Statement	Gillings Planning
Design and Access Statement	Simply Develop (UK) Ltd
Landscape Plan and Strategy	Syntegra Group
Transport Statement and Travel Plan	Syntegra Group
Arboricultural Survey and Arboricultural Impact Assessment	Syntegra Group
Ecology PEA and BNG Assessment	Syntegra Group
FRA	Syntegra Group
Noise Impact Assessment	Syntegra Group
Air Quality Assessment	Syntegra Group
Energy Strategy Report	Syntegra Group
Needs Assessment	Healthcare Property Consultants Limited
Daylight/Sunlight and Overshadowing Assessment	Syntegra Group
Drainage Strategy	Goodsons
Basement Impact Assessment	Goodsons
Construction Environment Management Plan	Simply Develop (UK) Ltd
Fire Statement	3-FE

1.4 The remainder of this statement is structured as follows:

- Section 2: Site Location and Description (including Planning History)
- Section 3: Development Proposals
- Section 4: Statement of Engagement
- Section 5: Planning Policy Context
- Section 6: Planning Analysis
- Section 7: The Planning Balance

Site Location and Description

Site and Surrounding Area

2.1 The site extends to 0.34 ha and is roughly square in shape, with accessed gained from Pield Heath Avenue and Pield Heath Road.

2.2 The application site comprises the following:

- The site of the former residential dwellings at No. 14 and 16 Pield Heath Road and no. 2 Pield Heath Avenue, now demolished (Class C3)
- The site of the former bed and breakfast at No. 18 Pield Heath Road, now demolished (Class C1)
- The residential dwelling at No. 12 Pield Heath Road (Class C3)

2.3 Whilst now demolished, No. 2 Pield Heath Avenue and No. 18 Pield Heath Road were both built as single-storey bungalows. No.12, the only remaining property on what is predominantly a cleared site, also forms a single storey bungalow. This is accessed from Pield Heath Road with a small driveway to the front (south) and a modest garden to the rear (north) which hosts a number of mature trees. This is similar to the majority of the properties on Pield Heath Avenue, most of which have been

extended to accommodate accommodation within the loft space over time. In contrast, Pield Heath Road demonstrates a more varied streetscene with a greater variation in both the scale and architectural design of developments, extending to one, two and even three-storey buildings including No.14 and 16 Pield Heath Road and No. 2 Pield Heath Avenue prior to their demolition.

2.4 Nos. 16 and 14 Pield Heath Road formerly comprised a pair of two storey semi-detached properties, with a mix of red brick and white render. Both properties were accessed from Pield Heath Road with modest driveways to the front (south) and small gardens to the rear (north). A mature hedgerow extends the length of the eastern boundary shared with the neighbouring residential site no.10 Pield Heath Road.

2.5 18 Pield Heath Road formerly occupied the Waterside Bed and Breakfast which was served by a dual access from Pield Heath Avenue (west) and Pield Heath Road (south). Whilst now demolished, this previously formed a red brick chalet style bungalow with habitable rooms in the loft-space with white render upon the external elevations as



Site Location

well as an extensive driveway. The site formerly had a modest garden located to the rear (north) of the site with a large dug-in swimming pool.

2.6 The existing site comprises a number of existing vehicular accesses. No.2 Pield Heath Avenue and no.18 Pield Heath Road have vehicular access onto Pield Heath Avenue respectively. No's 18, 16, 14 and 12 all have vehicular access onto Pield Heath Road.

2.7 The planning permission for the 60-bedroom care home scheme on the site was approved with an entrance and exit style access arrangement, with vehicular access into the site via Pield Heath Avenue and vehicular egress from the site onto Pield Heath Road.

2.8 The site is located within the London Borough of Hillingdon, off of Pield Heath Road approximately 2.9km from the centre of Uxbridge. Due to the site's urban location, the site is located close to a range of services, facilities and amenities such as Hillingdon Hospital, doctors surgeries, dentists, supermarkets, café's and restaurants. In terms of accessibility, a number of bus stops are located adjacent to the site on Pield Heath Road, served by the U2, U4 and U7 services to Uxbridge, Stockley Park and Hayes. A number of train stations are close to the site including Hayes and Harlington, West Drayton and Uxbridge (including Uxbridge London Underground station), all of which are within approximately 3km of the site.

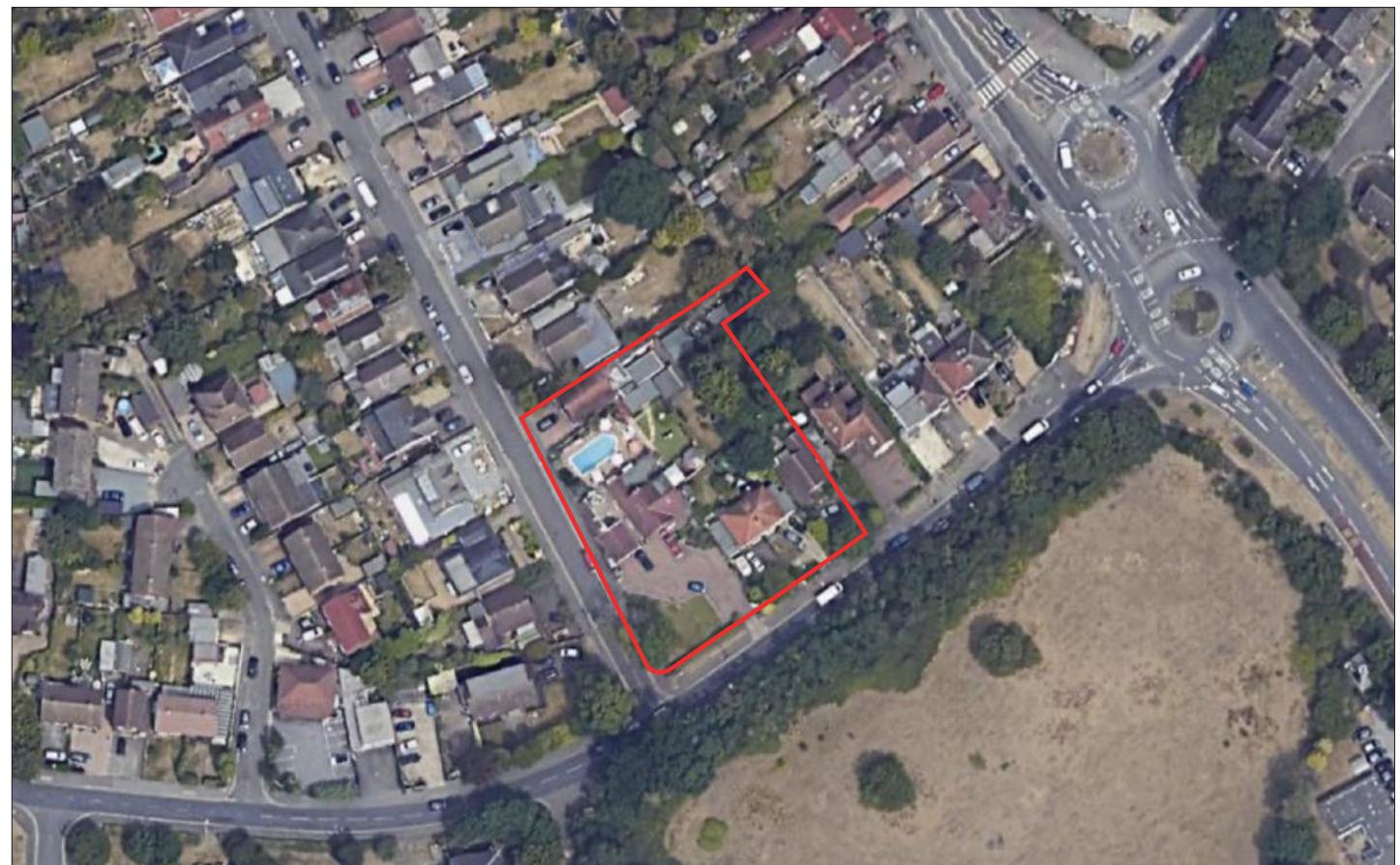
2.9 The wider area is characterised by predominately one, two and three storey residential

properties (C3 use) with a mix of detached, semi-detached and terraced properties. Within the wider area, there are clusters of commercial and industrial uses, as well as the Hillingdon Hospital, and the Brunel University campus.

2.10 There is a heath located opposite the site, which aside from falling within the Green Belt, is not subject to any particular designations. The northern edge of part of the Green Belt around

Colham Green is defined by Pield Heath Road, and consequently the proposal would sit opposite the Green Belt. However, the proposal would fall fully outside the extent of the Green Belt and would be visually separated by a row of existing established trees which line the southern side of Pield Heath Road.

2.11 An aerial image of the site with the site outlined in red is shown below:



Above: Aerial image of the site

Image: Google © 2024

2.12 The site shares its northern and eastern boundaries no.4 Pield Heath Avenue and no.10 Pield Heath Road respectively. The sites western boundary abuts Pield Heath Avenue and the southern boundary of the site abuts Pield Heath Road. Vegetation extends for much of the sites southern boundary in the form of trees and hedges and a low level brick wall forms the sites western boundary.

2.13 The site falls within flood zone 1, which is at the lowest risk of flooding, and is also not located in an area identified as being at risk of surface water flooding. There are no nearby heritage assets to the site. There are several trees within the site and around the edges of the site on all boundaries, none of which however are protected by TPOs or Conservation Area designations. The site is not located in proximity to any public rights of way. Furthermore, the site is not designated for any nature or ecological based purposes.

committee on the 11th of December 2023 under reference 76760/APP/2022/1889.

2.15 A non-material amendment (76760/APP/2024/1470) making internal and external reconfigurations was later approved on the 1st of July 2024.

2.16 Details pursuant to the discharge of Conditions 3 (Demolition and Construction Management and Logistics Plan) and 6 (Noise Survey and Assessment) as attached to planning permission reference 76760/APP/2022/1889 dated 11-12-23 (Demolition of three dwellings and one Bed and Breakfast, and the subsequent erection of a care home) were approved on 17th of July 2024.

2.17 There are no relevant planning applications on nearby or adjacent sites.

Planning History

2.14 A review of the Council's (available) online records confirms that there are applications which are relevant to this site. A full planning application for the demolition of three dwellings (Nos. 14 and 16 Pield Heath Road and 2 Pield Heath Avenue) and one Bed and Breakfast (No. 18 Pield Heath Road), and the subsequent erection of a part two, part three storey (plus basement) 60-bed care home, with 14 car parking spaces, landscaping and external amenity space. This application was granted permission via Hillingdon Council's planning

Development Proposals

Overall Concept

3.1 In December 2023, planning permission was granted on the site, for the demolition of three dwellings and a bed and breakfast and the subsequent erection of a 60-bed care home with associated parking, landscaping and external amenity space. Since the previous application was permitted, Simply Develop (UK) Ltd have acquired the site and that of no.12 Pield Heath Road.

3.2 The scheme proposed as part of this application, in essence, seeks a 21-bedroom extension to the previously approved 60-bed scheme by adding a further part 1, part 1.5 storey section at the rear of the site and a part 2, part 2.5, part 3-storey section to the front of the site, in turn, extending the approved scheme further towards the east following the proposed demolition of no.12 Pield Heath Road.

3.3 As the previously permitted scheme has not yet been implemented, a fresh full planning application is being submitted covering the whole of the site. The principle of a 60-bed care home has already been approved by the Council under the previous application but this is shown on the submitted



Proposed site plan

drawings for this application. The proposed development is described in full in the Design and Access Statement, which accompanies the planning application.

3.4 The proposed Class C2 care home will provide high quality accommodation for the elderly, with the capability for all care needs to be met on site. It is likely to be dual-registered, so that it can deliver both nursing and residential care, enabling the provision of dementia-specific care. It is therefore able to provide care for all dependency



levels. The proposed 81 bedrooms are all single occupancy, exceed CQC standards and are all en-suite, something which is required for a care bedroom to be considered as 'market standard'

Proposed Use and Layout

3.5 The care home has been designed so that it is able to respond to the differing needs of residents, as it will be occupied by individuals who require advanced levels of care and in some cases, palliative (end of life) care. As such, each floor benefits from lounge and dining space, along with a nurse's office and a drugs store, to ensure that residents can access the care that they need. Furthermore, the home benefits from communal facilities in the form of an arts and crafts room, sensory room, lobby/bar, activity rooms, a hair and beauty salon, a cinema, day space rooms and quiet lounges. These provide a variety of environments and experiences to ensure that residents are able to lead a varied and enjoyable life.

3.6 Internally, the proposed care home includes, 31 rooms on the ground floor, 30 rooms at first floor level and a further 20 rooms on the second floor.

3.7 As well as the amenities provided internally, the proposed scheme also provides a high-quality external amenity space for residents.

3.8 The proposed facility allows individual residents to receive varying degrees of support and care, which will be provided by the on-site care team

that will be present 24-hours a day. The work will comprise shift patterns of c. 25 staff during the day, reducing to c. 13 staff during the evening. The care team will not sleep on site. It is anticipated that the care home will employ staff equating to 38 FTE positions.

3.9 The design approach to the building is for it to be dementia friendly so it will allow for easy navigation both inside and outside ensuring a safe environment. Level access will be provided throughout, to the bedrooms as well as the lounges and dining areas. Two lift's will also be provided to all floors to allow easy access for all residents.

3.10 The design approach maintains the design, scale and form of the previously consented scheme, and with the sections facilitating the additional 21 bedrooms, still takes the form of a 'C'- shaped building. The building fronts both Pield Heath Avenue and Pield Heath Road as approved, responding to the corner location of the site. The proposed building will be set back from the frontages of both roads, with the largest of the set back being on the corner of the site, extending along the Pield Heath Road boundary which in turn, allows for an attractive frontage and landscaped edge.

3.11 The proposed floor plans are demonstrated on the following page.





View from Pield Heath Avenue



View from Pield Heath Avenue

Scale and External Appearance

3.12 A detailed Design and Access Statement prepared by Simply Develop (UK) Ltd has been submitted alongside this application. The proposed development seeks to effectively utilise a previously developed site, within the built up area of Uxbridge.

3.13 The design concept has been developed so as to maintain the architectural style, appearance, scale and massing of the previously approved 60-bed scheme, whilst sensitively extending the scheme towards the east, making further effective use of the additional previously developed land on the site of No.12 Pield Heath Road. In turn, the proposed scheme responds to the characteristics of the application site, which forms a corner site at the junction with Pield Heath Road and Pield Heath Avenue. The result is a high quality and attractive scheme, that responds well to both the commercial

requirements of a care home and the high standards of accommodation that is needed for the residents. Importantly, the proposal makes effective and efficient use of the space that is available on the site.

3.14 Attention has been given to ensure the comments raised by the Local Planning Authority at the pre-application stage, have been addressed and incorporated into the proposed scheme in order to make sure that the building is designed as well as possible and is an appropriate addition in this location.

3.15 As per the previously approved 60-bed scheme, the proposed development demonstrates a good balance between the need to make the best use of the application site, as well as the need to respect the scale and character of the surrounding locality. The proposal steps down so as to form an appropriate relationship with neighbouring properties and maintains a sufficient distance away

from them. Furthermore, the proposed scheme continues to maintain the building lines on both Pield Heath Road and Pield Heath Avenue, and is set back a sufficient distance within the site which as a result, allows ample room for attractive soft landscaping to address the streetscene and public realm, providing an appealing and welcoming environment.

3.16 An interesting and varied palette of materials is proposed as part of the proposed scheme, and maintains that demonstrated on the previously approved scheme. Illustrative CGIs of the proposed building are demonstrated here:

Landscaping

3.17 A detailed landscape specification prepared by Syntegra has been submitted alongside this proposal and shows the proposed layout and general character of the landscaping scheme for the proposed care home.

3.18 A secure residents garden is located centrally within the site along with a smaller wildflower garden within the north eastern corner of the site. The main residents garden is located centrally, and surrounded by the building, so that it is set away from Pield Heath Road and Pield Heath Avenue; the garden space will provide seating and a multipurpose lawn which can be utilised for events and games.

3.19 The proposed landscaping includes new trees, shrubs, perennials, hedgerows and climbers and a detailed planting schedule is provided with the submission.

Access, Servicing and Parking

3.20 A detailed Transport Statement and Travel Plan has been prepared by Syntegra Group and submitted alongside this application. These provide further information in relation to access, servicing and parking.

3.21 The existing site comprises a number of existing vehicular accesses. No.2 Pield Heath Avenue and no.18 Pield Heath Road have vehicular access onto Pield Heath Avenue. No's 18, 16, 14 and 12 all have vehicular access onto Pield Heath Road.

3.22 New access will be provided in the style of an 'in and out' arrangement. Vehicles will access the site off of Pield Heath Avenue and will egress the

site on to Pield Heath Road. Appropriate visibility splays are provided as per the Transport Statement prepared by Syntegra Group.

3.23 Vehicle tracking has been undertaken and demonstrates that the proposed site access is suitable for use by refuse collection vehicles, servicing vehicles and emergency vehicles which are likely to require access to the site. This would allow vehicles to enter and leave the site in forward gear made possible by provision of an on-site turning head adjacent to the service entrance. A total of 19 parking spaces are proposed including 3 wheelchair accessible spaces and 4 active electric vehicle charging points, alongside an ambulance bay, delivery bay, 8 cycle spaces and 4 mobility scooter spaces.

3.24 In order to encourage travel to the site by sustainable modes, a Travel Plan has been prepared and accompanies the application. This seeks to set preliminary targets to reduce vehicular trips to and from the site.

Drainage

3.25 This application is accompanied by a Flood Risk Assessment prepared by Goodsons and a full drainage strategy prepared by Syntegra Group and should be referred to for full detail. A summary is however, provided below.

3.26 These documents confirm that the application site falls within flood zone 1, which is at the lowest risk of flooding, and is also not located in an

area identified as being at risk of surface water flooding. Moreover, the application site is already extensively developed with limited attenuation of run off.

3.27 The site is served by a network of foul and surface water drainage and the proposals will connect to existing drainage on Pield Heath Road.

3.28 The proposed drainage infrastructure will be designed to ensure that the proposals do not cause flooding offsite for the 1 in 100 plus 40% climate change rainfall event.

Statement of Engagement

4.1 In accordance with national and local policy and guidance, a full programme of community and stakeholder engagement has been undertaken. Principal activities included:

- Pre Application discussions with the Council;
- Engagement with Ward Councillors; and
- Community consultation in the form of writing to and inviting to meet all adjacent neighbouring properties.

Pre Application Discussions

4.2 In line with Government Guidance on best practice, pre-application discussions were undertaken with planning officers at Hillingdon Council. A request for pre-application advice was submitted on the 5th of July 2024 and a meeting held on the 3rd of September 2024.

4.3 A written response was received from Hillingdon Council on the 20th of September 2024. This was a positive response and the main points raised were as follows:

- The principle of redevelopment the site has already been established by the previous planning approval for a 60-bedroom care home.
- The additional 21 bedrooms proposed would need to be supported by a need's assessment confirming that the increase in size of the care home would be meeting an unmet need.
- It was acknowledged that the originally approved 60-bedroom care home scheme establishes the overall scale, mass and height of the development. The proposed 81-bedroom scheme is broadly acceptable in design terms but requested that consideration be given to some further alterations.
- An updated Daylight and Sunlight assessment will need to be submitted with a full planning application, to ensure that the proposed scheme will not result in any adverse impacts on neighbouring amenities.
- The proposals in relation to parking, electric vehicle parking and mobility scooter parking is acceptable. The vehicular access proposed is considered acceptable. An updated Transport Statement will be required to reflect the new proposals and consider any differences in trip generation to the original scheme.
- The internal and external layout in terms of the quality of the care facility, amenity spaces and accessibility is acceptable.
- Confirmation that at least 10% BNG will be required along with a UGF score of 0.4. A PEA will also be required.

Engagement with Ward Councillors

4.4 An early invitation was extended to the Ward Councillors to provide information in respect of the proposal. A meeting was offered during the week commencing the 23rd of September in order to discuss the proposals if required.

Public Consultation

4.5 Following pre-application discussions with the Council, adjacent residential properties were written to individually via letter on the 13th of September, with information on the proposals

and offering an invitation to both comment on the proposals and to participate in a meeting should residents wish to discuss the proposals.

4.6 One response to the letters was received and a meeting was held on the 24th of September, where the team were able to answer questions and discuss the proposals. The main planning considerations raised in the meeting related to the impact on their residential amenity, in particular, loss of light.

4.7 In summary, the applicant has actively engaged with the local community and stakeholders to communicate and develop the proposals. This has met the requirements of the NPPF and the local guidelines, as set out in the Council's SCI. The pre-application engagement has ensured that the local community and key political stakeholders are well-informed of the proposals. Communication with interested parties remains on-going. As such, the applicant considers that the pre-application engagement undertaken with the local community and key stakeholders has been timely, meaningful, and effective.

Planning Policy Context

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning application be made with regard to the Development Plan, unless material considerations indicate otherwise.

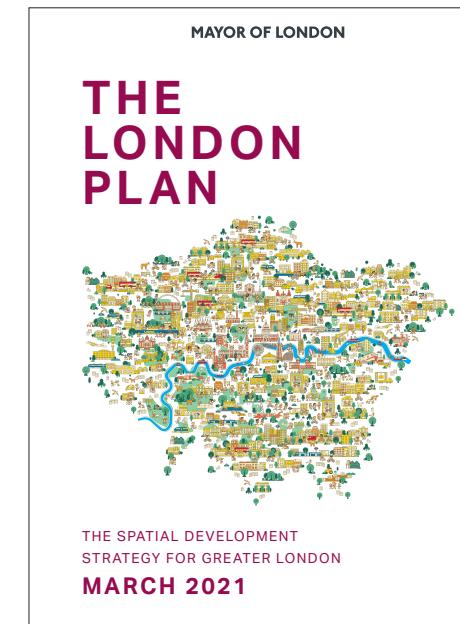
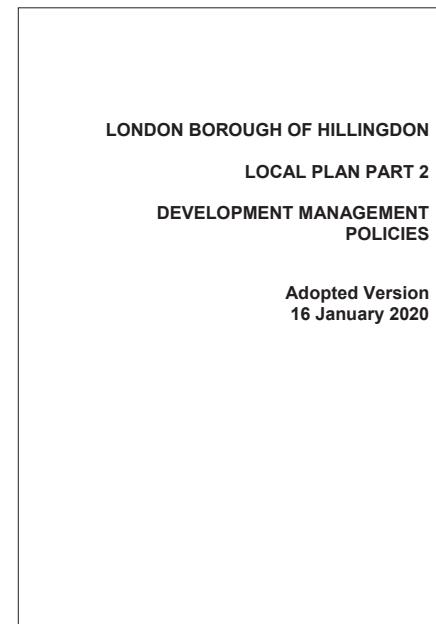
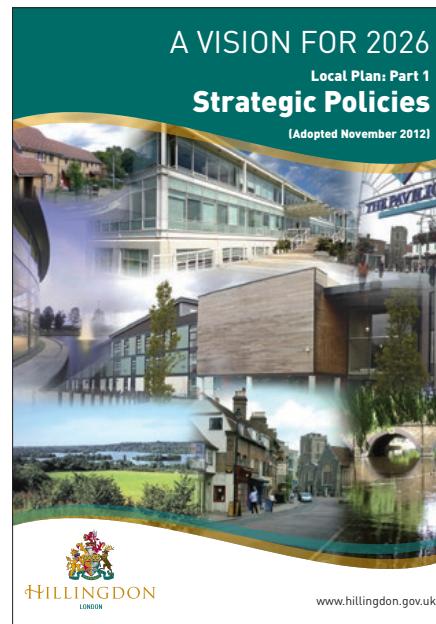
5.2 This is reiterated at paragraph 47 of the National Planning Policy Framework (NPPF), which also makes it clear that the NPPF is a material consideration in decision making.

5.3 The main planning policy considerations pertinent to the proposed development are considered below.

The Development Plan

5.4 The site is situated within the administrative area of the London Borough of Hillingdon Council. The Development Plan for the London Borough of Hillingdon Council comprises:

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



- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The London Plan (2021)

5.5 In addition to the above, Hillingdon Council are currently preparing a new local plan. This review is currently at the regulation 18 call for sites stage, and so at the time of writing is at a very early stage. The next stage of the new local plan preparation will be to carry out the regulation 18 consultation on the proposed plan during early 2025.

5.6 The following policies are to be relevant to this proposal.

Local Plan: Part 1 - Strategic Policies (2012)

5.7 Policy H1 (Housing Growth) confirms the Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies. The policy further confirms that The borough's current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021. Rolled forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of the Hillingdon Local Plan: Part 1- Strategic Policies.

5.8 Policy BE1 (Built Environment): Advises that the Council requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. New development is expected to achieve this through achieving high quality design and being designed appropriately to the identity and context of the local townscape as well as protecting the amenity of surrounding land and neighbouring buildings. The policy further advises that new development is expected to improve the quality of the public realm and creating safe and secure environments. Lastly, it all new development is expected to maximise the opportunities for tackling climate change.

5.9 Policy EM1 (Climate Change Adaptation and Mitigation) Confirms that the Council will ensure that climate change mitigation is addressed at every stage of the development process. The Policy seeks to ensure this by:

- Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
- Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
- Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
- Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.
- Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
- Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
- Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.

• Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.

- Promoting new development to contribute to the upgrading of existing housing stock where appropriate.

5.10 Policy EM6 (Flood Risk Management):

Confirms that the Council requires new development to be directed away from Flood Zones 2 and 3 in accordance with the NPPF. The policy goes on to confirm that the Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. Further, the policy states that the Council may require developer contributions to guarantee the long-term maintenance and performance of SUDS is to an appropriate standard.

5.11 Policy EM7 (Biodiversity and Geological Conservation): Advises how the Council will aim to preserve and enhance the boroughs biodiversity and geological conservation. In relation to new development, the policy confirms that the Council will seek appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan. In addition,

the policy states that all new development will be required to make provision for biodiversity enhancements where feasible as well as stating that the Council will support the inclusion of green roofs, living walls and alike.

5.12 Policy EM8 (Land, Water, Air and Noise): In relation to water quality and resources, the policy confirms that the Council will seek to safeguard and improve all water quality, both ground and surface. The policy states that principal aquifers and source protection zones will be given priority. Furthermore, the policy confirms that all new development is required to demonstrate that water efficiency measures have been incorporated including water recycling and collection measures. For residential development, it must be demonstrated that water consumption does not exceed 105 litres

5.13 With respect to air quality, the policy confirms that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

5.14 Lastly, with regard to land contamination, the policy advises that all new development is expected to provide mitigation strategies where contaminated land is known to be present.

5.15 Policy EM11 (Sustainable Waste Management):

States that the Council aims to reduce the amount of waste produced in the Borough and as such, expects all new development to address waste management at all stages of a developments life from design and construction through to end us and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

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

5.16 Policy DMH 1 (Safeguarding Existing

Housing): Sets out the Councils policy on the safeguarding of existing housing. The Policy confirms that the net loss of existing self-contained housing including affordable housing will be resisted unless the housing is replaced with at least equivalent residential floorspaces.

5.17 Policy DMH 8 (Sheltered Housing and

Care Homes): Confirms that the development of residential care homes and other types of supported housing will be permitted provided that:

- i it would not lead to an over concentration of similar uses detrimental to residential character or amenity and complies with Policy DMH 4: Residential Conversions;

- ii it caters for need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;

- iii the accommodation is fully integrated into the residential surroundings; and
- iv in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.

- v Proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).

5.18 Policy DMHB 11 (Design of New

Development): Advises that all development must be designed to the highest standards and incorporate principles of good design such as harmonising with the local context, utilising high quality building materials, implementing adaptable internal layouts, and protecting existing on-site and adjacent important features. Furthermore, the policy confirms that new development must not adversely impact the amenity of nearby properties or compromise the re-development of adjoining sites which have development potential.

5.19 Policy DMHB 14 (Trees and Landscaping):

Confirms that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit, along with requiring the provision of a landscape scheme which includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure. Where space for ground level planting is limited, such as high-rise buildings, the inclusion of living walls and roofs will be expected where feasible. Lastly, Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

5.20 Policy DMEI 2 (Reducing Carbon Emissions):

States that all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. The policy confirms that all major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved. Further, the policy advises that Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite,

the Council may approve the application and seek an off-site contribution to make up for the shortfall.

5.21 Policy DMEI 7 (Biodiversity Protection and Enhancement):

Confirms that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site and that if there is any loss of such features, replacements of equivalent value should be provided on-site. Where on site replacements cannot be achieved, the appropriate contributions will be sought. The policy goes on to confirm that should a site be considered to have features of biodiversity or geological value then the appropriate surveys and assessments to demonstrate the proposed development does not have unacceptable effects must be submitted.

5.22 Policy DMEI10 (Water Management, Efficiency and Quality):

Advises that surface water runoff should be reduced to no higher than pre-development greenfield run off rates in a 1:100 year storm scenario plus an allowance for climate change. SuDS should be used including measures to avoid pollution. All new development should incorporate water efficiency measures and water usage should be no more than 105 litres per person, per day. All new proposals are required to demonstrate that there is sufficient capacity for them.

5.23 Policy DMEI 14 (Air Quality):

Advises that 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. The policy confirms that as a minimum, development proposals should be at least air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors and actively contribute towards the improvement of air quality.

5.24 Policy DMT 6 (Vehicle Parking):

Sets out the requirements expected of new development with regard to vehicle parking. The policy advises that proposals must comply with the parking standards as set out in Appendix C table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The policy continues to confirm that the Council may agree to vary the requirements where they would not lead to other detrimental impacts and lastly, that all new car parks provided must contain conveniently located reserved spaces for wheelchair users and those with restricted mobility.

The London Plan (2021)

5.25 Policy D11 (Safety, security and resilience to emergency):

States that development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

5.26 Policy D12 (Fire safety): States that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.

5.27 Policy D13 (Agent of change): States that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. The policy confirms that development proposals should manage noise and other potential nuisances by:

- 1 ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
- 2 exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
- 3 separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

5.28 Policy D14 (Noise): In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- 1 avoiding significant adverse noise impacts on health and quality of life
- 2 reflecting the Agent of Change principle as set out in Policy D13 Agent of Change

- 3 mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 4 improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5 separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation
- 6 where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7 promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

5.29 Policy D2 (Infrastructure requirements for sustainable densities): Confirms that the density of development proposals should:

- 1 consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels

- 2 be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)

5.30 Policy D3 (Optimising site capacity through the design-led approach): States in part that development proposal should:

'Form and layout'

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

Experience

- 5 *achieve safe, secure and inclusive environments.*
- 6 *provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.*

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

Quality and character

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

5.31 Policy D4 (Delivering good design): States that design and access statements submitted with development proposals should demonstrate that

the proposal meets the design requirements of the London Plan.

5.32 Policy D5 (Inclusive design): States that development proposals should achieve the highest standards of accessible and inclusive design.

5.33 Policy D7 (Accessible housing): States that to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:

- 1 at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- 2 all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

5.34 Policy G5 (Urban greening): states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

5.35 Policy GG2 (2021) Making the best use of land: Seeks to create sustainable mixed-use places through, in part:

- 'D) applying a design-led approach to determine the optimum development capacity of sites.

- F) protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'.

5.36 Policy GG3 (2021) Creating a healthy city:

Seeks to improve Londoners health and reduce health inequalities by, in part, plan for appropriate health and care infrastructure to address the needs of London's changing and growing population.

5.37 Policy GG4 (2021) Delivering the homes

Londoners needs: seeks to create a housing market that works better for all Londoners including the creation of mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

5.38 Policy H13 (Specialist older persons housing):

States that boroughs should work positively and collaboratively with provider in regards to specialist older person housing taking account of:

- 1 'local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks.'
- 2 the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport.'
- 3 the increasing need for the accommodation suitable for people with dementia'.

5.39 Table 4.3 of the London Plan confirms that the annual benchmark figure for specialist older persons housing in Hillingdon is 180 units per annum.

5.40 Policy H8 (Loss of existing housing and estate redevelopment) States that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

5.41 Policy SI1 (Improving air quality) States that development proposals should not lead to further deterioration of existing poor air quality and sets out minimum requirements to achieve.

5.42 Policy SI12 (Flood risk management) States that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

5.43 Policy SI13 (Sustainable drainage) States that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

5.44 Policy SI2 (Minimising greenhouse gas emissions) States that major developments should be net-zero carbon, include a detailed energy strategy and have a minimum on-site reduction of at least 35 per cent beyond Building Regulations. Non-residential development should achieve 15 per cent through energy efficacy measures.

5.45 Policy SI 3 (Energy Infrastructure) states that all major development proposals shall explore opportunities to maximise the use of on-site renewable energy generation and incorporate demand-side response measures.

5.46 Policy T1 (Strategic approach to transport) States that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

5.47 Policy T2 (Healthy Streets) States that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. In addition, development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets whether stationary or moving and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

5.48 Policy T5 (Cycling) states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

5.49 Policy T6 (Car parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

Other Material Considerations

5.50 The following documents also form material considerations of relevance to this application:

- National policy (primarily set out in the National Planning Policy Framework and Planning Practice Guidance)
- Additional guidance contained in Supplementary Planning Documents (SPD) and other guidance
- London Borough of Hillingdon Strategic Housing Market Assessment Update Report of Findings October 2018

5.51 The following Supplementary Planning Documents (SPD) and guidance have also been considered in developing the submitted proposals:

- Supplementary Planning Document Planning Obligations July 2014

National Planning Policy Framework

5.52 The National Planning Policy Framework (NPPF) December 2023 sets out the Government's policies for the planning system and is clear that 'the purpose of the planning system is to contribute to the achievement of sustainable development' (paragraph 7). The latter is defined, in paragraph 8, as the convergence of 'three overarching objectives':

- Economic objective – 'To help build a strong, responsive and competitive economy'.
- Social objective – 'To support strong, vibrant and healthy communities'.
- Environmental objective – 'To contribute to protecting and enhancing our natural, built and historic environment'.

5.53 Importantly, paragraph 11 confirms that development which accords with an up-to-date development plan should be approved without delay. Where there are no relevant development plan policies or where they are out-of-date, planning permission should be granted unless:

- The application of policies in the NPPF protecting areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

5.54 Section 4 of the NPPF relates to decision making and states in part that local planning authorities "*should approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible*" (paragraph 38).

5.55 It is confirmed in paragraph 55 that the use of planning conditions (and obligations) should be considered for development that would otherwise be unacceptable. Paragraph 57 goes on to confirm that planning obligations can only be used where they are necessary, directly related to and fairly and reasonably related to the development.

5.56 Section 5 (Delivering a sufficient supply of homes) relates to the delivery of a sufficient supply of homes and emphasises the Government's objective to significantly boost the supply of homes. Paragraph 63 advises that the size, type and tenure of housing for different groups (including older people) should be assessed and reflected in planning policies.

5.57 Section 6 (Building a strong, competitive economy) seeks to support economic growth and productivity accounting for local needs and wider opportunities and considering the needs of different sectors. Paragraph 85 states that significant weight should be assigned to 'the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development'.

5.58 Section 8 (Promoting healthy and safe communities) seeks to deliver healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles. Local authorities should guard against the unnecessary loss of local services to enhance the sustainability of communities and residential environments. An integrated approach to the location of housing, economic uses and community facilities and services should be adopted.

5.59 Section 9 (Promoting sustainable transport) seeks to ensure that transport matters are considered at the earliest stages of development. Paragraph 115 advises that development should only be 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.

5.60 Section 11 (Making effective use of land) gives substantial weight to the value of using suitable brownfield land. Paragraph 124 notes that policies and decisions should promote and support the development of under-utilised land and buildings especially where it would help to meet identified needs for housing and where land supply is constrained.

5.61 Paragraph 131 within Section 12 (Achieving well-designed places) emphasises that good design is a key aspect of sustainable development "The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

5.62 Section 14 (Meeting the challenge of climate change, flooding and coastal change) seeks to secure a transition to a low carbon future ensuring that climate change adaptation, flood risk and coastal change is considered in new development.

5.63 Section 15 (Conserving and enhancing the natural environment) seeks to contribute to and enhance the natural and local environment, protect and enhance habitats and biodiversity and consider ground conditions and pollution. Paragraph 180 confirms that development should contribute to and enhance the natural and local environment, by – *inter alia* – recognising the intrinsic character of the countryside and providing net gains for biodiversity.

Planning Practice Guidance (PPG)

5.64 On 6 March 2014, the Department for Communities and Local Government (“DCLG”) launched the Planning Practice Guidance web-based resource.

Design: Process and Tools

5.65 Paragraph 001 (Reference ID: 26-001-2019001) states that the adoption of a proactive and collaborative approach can help to achieve well-designed places. It refers to the National Design Guide which sets out characteristics of well-designed places which relate to context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.'

Housing for Older People

5.66 There is a specific section of the PPG that addresses housing for older and disabled people. Paragraph 001 (Reference ID: 63-001-20190626) in this section states: '*The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing*'. This paragraph continues by saying that "offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems".

5.67 The PPG confirms that "...The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes, strategic policymaking authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people" (Paragraph 003, Reference ID: 63-003-20190626).

5.68 Paragraph 006 (Reference ID: 63-006-20190626) also notes that "*Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist*

housing for older people needed across the plan area throughout the plan period".

5.69 It is clear that government guidance considers the provision of specialist housing for older people as contributing towards the overall housing supply for Authorities. The revisions to the PPG reiterate previous guidance in confirming that "... *Local planning authorities can include the provision of housing for older and disabled people when preparing the Authority Monitoring Report*" (Paragraph 007 Reference ID: 63-007-20190626).

5.70 Paragraph 016, Reference ID: 63-016-20190626 advises decision makers to consider the following when assessing applications for specialist housing for older people: '*Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is a identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need*'.

5.71 Furthermore, paragraph 016a (Reference ID: 63-016a-20190626) advises that: "*Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data*".

5.72 Paragraph 019, Reference ID: 63-019-20190626 advises that the characteristics of a dementia friendly community include:

- 'Easy to navigate physical environment'
- Appropriate transport
- Communities shaped around the views of people with dementia and their carers
- Good orientation and familiarity
- Reduction in unnecessary clutter
- Reduction in disorienting visual and auditory stimuli'.

5.73 Paragraph 035 (Reference ID: 68-035-20190722) of the 'housing delivery and supply' section of the PPG advises that housing for older people including Class C2 residential institution can be included within the 5-year housing land supply, based on the amount of housing released as a result. The Housing Delivery Test Measurement sets a ratio of 1.8 for communal households, including residential institutions.

Healthy and Safe Communities

5.74 Paragraph 001 (Reference ID: 53-001-20190722) advises that the design of the built and natural environment is key to health and wellbeing and that environments can be created to support and encourage healthy lifestyles.

5.75 Paragraph 003 (Reference ID: 53-003-20191101) sets out that a healthy place is one that supports and promotes healthy behaviours and health equality in order to improve physical and

mental health for communities. It refers to inclusive design and social interaction and the need to ensure developments are adaptable to the needs of those with sensory or mobility impairments.

Natural Environment

5.76 Paragraph 008 (Reference ID: 8-008-20190721) sets out that green infrastructure needs to be considered at the earliest stages of a proposal and will require suitable management and maintenance.

5.77 Paragraph 016 (Reference ID: 8-009-20190721) sets out that authorities need to consider the impact on protected species in their assessment of development proposals.

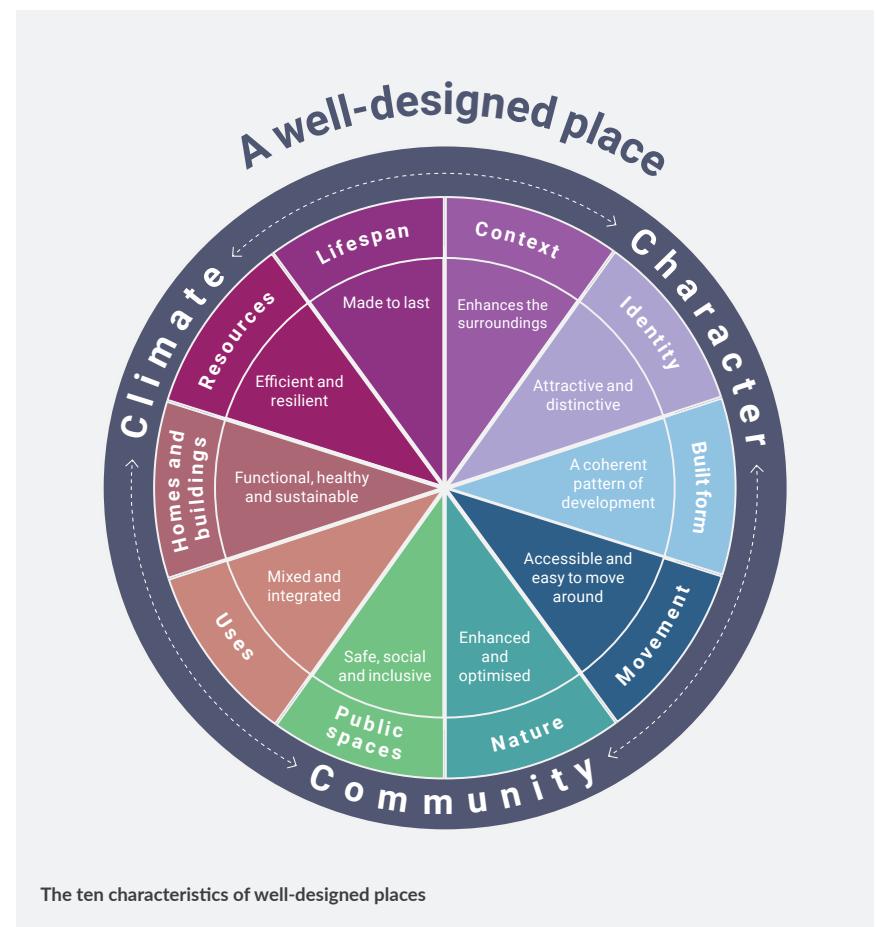
5.78 Paragraph 018 (Reference ID: 8-018-20190721) requires information of biodiversity and geodiversity to inform development proposals. Further, it confirms that where developments are subject to biodiversity net-gain requirements, the application must be accompanied by the minimum information required for this to be assessed.

Biodiversity Net Gain (BNG)

5.79 Paragraph: 001, Reference ID: 74-001-20240214 sets out a requirement for at least 10% BNG to be secured by condition – the BNG condition. This is a pre-commencement condition and once planning permission has been granted, a Biodiversity Gain Plan must be submitted to and approved by the local planning authority prior to commencement.

National Design Guide

5.80 The National Design Guide was published by the Ministry of Housing Communities and Local Government. It builds on the guidance set out in the NPPF and its accompanying Guidance, and outlines the Government's priorities for well-designed places in the form of ten characteristics. As follows:



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5.81 The London Plan sets out that to meet the predicted increase in demand for care home beds, London needs to provide an average of 867 care home beds a year until 2029, and this is not divided by borough but is expressed as an overall London-wide need. Table 4.3 of the London Plan confirms that the annual benchmark figure for specialist older persons housing in Hillingdon is 180 units per annum. It is recognised that the borough of Hillingdon, like much of London, has an aging population, with the over-65 and over-85 age groups predicted to increase by 7.1% and 8% respectively, compared to an average of a 5% increase for the younger age groups over the plan period. It is further recognised that there is general demand for care home bedrooms established by the London Plan and the Hillingdon Local Plan, as identified within the London Borough of Hillingdon Strategic Housing Market Assessment Update Report of Findings October 2018.

Planning Analysis

6.1 This section analyses the suitability of the proposed development in the context of local and national planning policy. Starting with the principle, this section demonstrates that the proposed development represents sustainable development which is in accordance with the Development Plan and that the benefits of the scheme outweigh any other material considerations.

6.2 Reference is made within this section to assessments within technical reports that have been submitted in support of the planning application. Those should however be referenced in full as part of the assessment of the planning application.

Principle of Development

6.3 This section sets out how the proposed development is acceptable in principle in terms of use and form. There are 3 strands to consider in this regard:

- Location of the site
- Principle of a C2 care use; and
- Loss of housing



Location of the Site

6.4 The site is located within the settlement boundary of Uxbridge, where the principle of new development is accepted as per the spatial strategy set within both the Hillingdon Local Plan and the London Plan. Specifically, policy GG2 of the London Plan (making the best use of land) supports the creation of successful and sustainable mixed-use places that make the most efficient use of land. As such, the development of brownfield land such as this should be supported, particularly on sites within and on the edge of town centres; something which is also reinforced and encouraged by national planning policy in chapter 11 of the NPPF.

6.5 The principle of the redevelopment of the site of Nos. 14, 16 and 18 Pield Heath Road and 2 Pield Heath Avenue has already been accepted and established under the previous permission on the site, granted on the 11th December 2023 (ref. 76760/APP/2022/1889) as set out in the Planning History section above. The Planning History is a material consideration to which substantial weight should be afforded.

6.6 This proposal seeks to provide a larger care home by providing extensions to the approved scheme on land currently associated with No.12 Pield Heath Road. Based on the planning policy position and having regard to the previous permission, it is considered that this is acceptable in this location, making most effective use of land in an appropriate location.

6.7 The transport statement that accompanies the planning application, confirms that the site has a PTAL rating of 3 which is defined as moderate in terms of accessibility. Due to the site's urban location, the site is located nearby to a range of services, facilities and amenities such as Hillingdon hospital, doctors / GP surgeries, dentists, supermarkets, cafés and restaurants, all within 3km of the site. In terms of accessibility, a number of bus stops are located adjacent to the site on Pield Heath Road, served by the U2, U4 and U7 services which provide access to Uxbridge, Stockley Park and Hayes. A number of train stations are within 3km of the site including Hayes and Harlington, West Drayton and Uxbridge (including Uxbridge London Underground station). Uxbridge town centre is also less than 3km away from the site and is a metropolitan centre according to the adopted local plan, providing an excellent range of local services.

6.8 Given the sites close proximity to a host of services, facilities, amenities and public transport networks, the site is considered to be located sustainably and capable of accommodating the proposed development.

6.9 Notwithstanding this, this scheme proposes a care home for nursing and residential care where the needs of residents will be advanced. As needs become more advanced, demand to utilise local services and facilities reduces due to resident's reliance on care and services provided on-site. Due to their complex needs, the majority of residents are highly unlikely to be able to leave the facility

unaccompanied meaning there will be very limited demand from residents to travel independently. The sustainable location of the site will however, ensure that it is easily accessible for staff and visitors.

6.10 To conclude on location, the site is within the settlement boundary, forms previously developed land and is located in good proximity to local facilities and public transport services. It has also previously been accepted as a location for a care home through the previous 60-bed approval. Having regard to this, there can be no dispute that the site is an appropriate location for the proposed development. .

Provision of C2 accommodation

6.11 This planning application is for the erection of an 81-bed care home (Use Class C2) on this site. As highlighted above, the starting point is that the principle of a care home in this location has already been established by the existing permission for a 60-bed care home. This proposal now incorporates buildings and land associated with No.12 Pield Heath Road to extend the approved scheme and provide an additional 21 bedrooms, increasing the size of the previously approved care home from 60 to 81 beds.

6.12 The Hillingdon Local Plan sets out support for new care uses subject to compliance with the criteria of Policy DMH 8 (Sheltered Housing and Care Homes). These are discussed in further detail below.

Overconcentration

6.13 The proposed development does not seek to provide a new care home in this location but instead seeks to enlarge the previously approved scheme to deliver an additional 21 bedrooms. The principle of a care home in this location has already been established with no concern raised regarding overconcentration for the previous application. As such, the additional 21 bedrooms to the already consented 60 bedrooms are not considered to result in an overconcentration of care uses in this location.

Identified need

6.14 This application is accompanied by a care need assessment prepared by HPC which demonstrates that there is a genuine need for the proposed care home. The assessment considers need within the wider borough and a 3 mile catchment area for the site. For both, the assessment looks at 'market standard' bedrooms which have ensuite provision.

6.15 For the borough, the need assessment identifies a current need for 447 additional bedspaces as of 2024, increasing to 609 by 2030.

6.16 For the 3-mile catchment area, the need assessment identifies a current need for 289 additional bedspaces as of 2024, increasing to 402 by 2030.

6.17 The submitted need assessment identifies a significant unmet need in both the borough and the 3-mile catchment area. There is therefore, a

pressing need for care home accommodation which this proposal seeks to address.

6.18 The provision of care homes remains an important part of the overall care provision in the area and is particularly important for those with advanced needs such as dementia.

6.19 The proposed scheme, would assist in offsetting the significant existing statistical undersupply of appropriate accommodation across the Borough and the 3-mile catchment area. It would further create additional capacity in line with the Hillingdon Strategic Housing Market Assessment (SHMA) update and would offer a nature of accommodation fit for accommodating older persons with increasing care need levels as identified within Hillingdon Adult Social Care documentation.

6.20 The London Plan sets out that to meet the predicted increase in demand for care home beds, London needs to provide an average of 867 care home beds a year until 2029, and this is not divided by borough but is expressed as an overall London-wide need. Table 4.3 of the London Plan confirms that the annual benchmark figure for specialist older persons housing in Hillingdon is 180 units per annum. It is recognised that the borough of Hillingdon, like much of London, has an ageing population, with the over-65 and over-85 age groups predicted to increase by 7.1% and 8% respectively, compared to an average of a 5% increase for the younger age groups over the plan period. It is further recognised that there is general

demand for care home bedrooms established by the London Plan and the Hillingdon Local Plan, identified by the relevant Strategic Housing Market Assessments (SHMAs).

6.21 On 24th July 2024 the Draft Adult Social Care Market Position Statement 2024 – 2027 was presented to the Health and Social Care Select Committee for consideration. In assessing the need for further care home provision. Regard has been given to this draft document as the most recent market assessment carried out by the local authority (Adult Social Care). Section 6.4 to the Draft Market Position Statement identified '*Market Issues and Challenges*' with the primary challenge being identified as '*high occupancy levels*'. Indeed, the Local Authority data contained therein confirms Borough care home occupancy to be comfortably higher than not only North West London as a region but also Greater London in its entirety.

6.22 The London Borough of Hillingdon Strategic Housing Market Assessment Update was published in October 2018. Section 5 to the document is entitled 'Needs of Different Groups' with a specific sub-section headed '*Housing for Older People*'. This provides a comprehensive assessment in terms of supply and demand for specialist housing comprising both traditional sheltered housing and modern variants such as extra care and enhanced sheltered housing. The document is however, devoid of specific commentary / quantification appertaining to care home provision for older persons.

6.23 Paragraph 5.27 of the SHMA Update confirms that the identified level of Objectively Assessed Need '*does not include the projected increase of institutional population*' with the subsequent paragraph confirming '*the Borough Council will therefore need to consider the most appropriate way to count the supply of bed spaces in residential institutions (Use Class C2) as part of their overall housing monitoring, and decide whether this should form part of the overall housing supply*'. Whilst the 2018 SHMA does not provide specific quantification in relation to care home provision for older persons, it does underline the rapid rise forecast in the Borough's older population.

6.24 The provision of a care home on this site has already been accepted through the granting of the previous application and the need for care across London and Hillingdon as a borough was acknowledged within the Officers report for this. The submitted need assessment identifies that there is a pressing need for additional care accommodation,

Integration with surroundings

6.25 The proposed increase in built form in comparison would merely form a continuation of that already approved. This combined with the adoption of a high quality and sensitive design approach would ensure that the additional accommodation would be fully integrated into its surroundings.

6.26 The design approach has been carefully considered, drawing upon and driven by the previously permitted scheme on the site, in order to ensure the design principles established and agreed with the Council under the previous permission are maintained. This includes the overall height of the building and the step down in height towards the rear to respect adjacent residential amenities whilst maintaining the attractive 2.5 / 3 storey sections along the main frontage.

6.27 The proposals include provision of a high-quality landscaping scheme surrounding the building. This will consist of new tree planting as well as native and ornamental planting, as shown on the submitted landscaping plan. This has considered the existing context and views of the site with the intention of creating an attractive setting for the new building, whilst also providing attractive usable garden spaces for future residents.

6.28 As a result, the proposed 81-bedroom scheme will continue to respond positively to the site, the existing street scene and neighbouring residential properties.

Provision of care

6.29 The levels of care as required by C2 residential care establishments are demonstrated clearly throughout the proposals.

6.30 The proposed care home will provide a variety of elderly nursing care for those living with

complex and specialist needs including dementia, respite, palliative and end of life care. It will be operated by Morar Living who focus on providing a safe and familiar environment and providing the highest level of care.

6.31 Residents will require 24-hour specialist care and help support in undertaking everyday tasks that many of us take for granted. Residents will benefit from a tailored care package, determined according to their individual needs. A wide range of care services will be provided by on-site staff 24-hours a day and by visiting medical professionals from local doctors' surgeries. There will also be a dedicated ambulance drop off / pick up space within the car park to assist with hospital trips where required.

6.32 Residents will benefit from dedicated on-site catering which will provide daily meals with catering provided via the central kitchen. Their other needs will be met by the on-site team and residents will rely on visits to the care home by family and friends making use of their private rooms or one of the many communal areas that will be provided throughout.

6.33 The area available on site allows for the provision of generous resident gardens for the care home including a range of spaces for residents to use. This is particularly important considering that many care home residents will not be able to leave the home unaccompanied and the wide ranging benefits associated with access to outdoor space,

Overall benefits of care accommodation

6.34 There are significant social benefits arising from a care home proposal, including significant savings to the NHS as a result of removal of 'bed blocking' within hospitals and reduced falls at home, improved wellbeing and a reduction in loneliness.

6.35 It is also important to note the wide-ranging health and wellbeing benefits that can occur when someone moves into specialist care accommodation, improving their overall quality of life. In particular, residents benefit from a wider range of social interactions and access to events on-site which include consideration of their individual needs. Importantly, residents have access to much needed specialist care.

6.36 With respect to the contribution of this proposal to housing land supply overall, the proposed 81-bed scheme would

- Result in the equivalent provision of 81 dwellings, incorporating the 60 approved beds and the 21 additional beds with the application of the 1:1 ratio set out in the London Plan.
- Result in the equivalent provision of 45 dwellings, incorporating the 60 approved beds (equivalent of 33) and 21 proposed beds (equivalent of 12) with the application of the 1:8 ratio set out in the PPG.

6.37 The NPPG advises that Local Planning Authorities can count housing provided for older people, including uses within Class C2, as part of

their housing land supply (Paragraph 035, Reference ID 68-035- 20190722). Based on the above, the proposal would assist with housing land supply and this should be assigned significant weight.

6.38 In addition, the need's assessment provided with this submission confirms that a host of other associated benefits are presented locally as a result of the proposed development, these are:

- Through the contribution towards care home bed spaces this scheme would provide, it would assist Hillingdon in limiting the need to place service users '*out of area*'.
- Improve the overall environmental quality of the care home estate through development of modern accommodation designed for purpose.
- Help offset future care home closures as dated premises become either unviable or unfit for purpose in the face of changing / increased care needs.
- Reduce the impact risks of future pandemics through provision of an environment specifically designed for purpose with the needs of elderly residents in mind.
- Enable older persons to vacate under-occupied dwellings for use as family housing.

6.39 Having regard to the above, the principle of a care use is already established in this location via the approval of the 60-bed scheme. This proposal seeks to deliver additional care beds in this location, maintaining and enhancing care provision

in the borough. The proposals would be acceptable in line with adopted and emerging policies by:

- Placing a new care home in an area where there is not an overconcentration.
- Proposing a design which clearly integrates with its surroundings.
- Providing an excellent level of care and a range of communal facilities for residents, some of whom may not be able to leave unaccompanied due to their advanced needs.
- Responding to a clear local need for care, enhancing the supply overall and contributing towards addressing current identified shortfalls.

Loss of housing

6.40 Policy DMH1 (Safeguarding Existing Housing) of the Hillingdon Local Plan Development Management Policies, advises that the net loss of self-contained housing will be resisted unless the lost housing is replaced with at least an equivalent amount of residential floorspace. The policy goes on to confirm that this is to ensure that the redevelopment and intensification of London's housing stock continues to play an important role in the provision of new homes across London. Policy H8 (Loss of existing housing and estate redevelopment) of the London Plan also sets out that any loss of existing housing should be replaced by new housing at existing or higher densities.

6.41 The loss of existing housing should be considered against the provision of a new care home. Policy H13 of the London Plan (Specialist older persons housing) outlines within the supporting text that care home accommodation (C2 use class) is an important element of housing choice for Londoners and this should be recognised in planning decisions. It is also important to note that the supporting text to policy H1 of the London plan states that net non-self-contained accommodation for older people (falling within the C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home. The reasoning behind this is that the creation of targeted supported housing should free up self-contained housing elsewhere in the borough as a result.

6.42 In this instance, the principle of the loss of nos.14 and 16 Pield Heath Road and 2 Pield Heath Avenue has already been established through the granting of planning permission for the 60-bed care home.

6.43 The proposed 81-bed scheme would result in the loss of a single dwelling at no.12 Pield Heath Road. In accordance with policy H8 and policy DMH1 and applying the 1:1 ratio, the equivalent provision of 81 dwellings, incorporating the 60 approved beds and the 21 additional beds, would outweigh the loss of a single dwelling by enhancing the provision of habitable accommodation overall.

6.44 Even with the application of the 1.8 ratio from the PPG, the proposal would result in the

provision of 45 dwellings, incorporating the 60 approved beds (equivalent of 33) and 21 proposed beds (equivalent of 12), outweighing the loss of residential accommodation.

Conclusion on Principle of Development

6.45 Having regard to the above, the development proposed is considered to be acceptable in principle for the following reasons:

- This proposal seeks to provide a 21-bedroom extension to the approved 60-bedroom care home, on an area of previously developed land within the settlement boundary and located close to the centre of Uxbridge.
- Whilst the development would result in the loss of residential accommodation, this loss has already been accepted in the 60-bed permission and the loss of one additional dwelling would be offset by the provision of much-needed care home accommodation, contributing to a mix of accommodation overall.
- The proposal would help to meet an identified need for care beds, which in turn will assist in freeing up self-contained housing, elsewhere in the borough, and contributing positively toward the provision of care in the borough.
- The site is located within a highly accessible and sustainable location to which development is directed and will not impact on the local character of the area in terms of over concentration.

6.46 In light of the matters discussed above, this proposal complies with policy H1, DMH1 and DMH8 of the Hillingdon Local Plan; policies H8, H13, GG2, GG3 and GG4 of the London Plan; and sections 5, 8 and 11 of the NPPF.

Other Material Considerations

6.47 The principle of development is supported by the development plan and the remainder of this chapter examines material planning considerations to demonstrate that in all other regards the proposal conforms with the policy framework including the Hillingdon Local Plan, the London Plan and the NPPF. Namely, these considerations relate to:

- Design;
- Neighbouring amenity;
- Access and Parking;
- Landscape, Ecology, Trees, Biodiversity and Urban Greening;
- Drainage;
- Sustainability;
- Ground Conditions;
- Air Quality;
- Noise

Design

6.48 The design approach is set out in the Design and Access Statement prepared by Simply Develop (UK) Ltd which accompanies the planning application. This provides an analysis of the site context and demonstrates that the proposal meets the design requirements of the London Plan and should be referenced in full. In brief, however and as already highlighted throughout this planning statement, the design approach is consistent with that of the approved scheme and as such, continues to represent a high standard of design which respects the local context, meets all relevant standards and provides a high-quality design approach that will enhance the visual appearance of this site.

6.49 Policy BE1 of the Hillingdon Local Plan and London Plan policies D3, D4 and D5 require developments to adhere to the principles of urban design and sustainability in order to achieve high quality development.

6.50 The proposed scheme has evolved following pre-application discussions with officers on the design of the proposed development and in particular, the new sections of the building which will accommodate the additional 21-bedrooms.

6.51 The design approach has been carefully considered, drawing upon and driven by the previously permitted scheme on the site, in order to ensure that the design principles established and agreed with the Council under the previous

permission are maintained. As a result, the proposed 81-bedroom scheme will continue to respond positively to the site, the existing street scene and neighbouring residential properties.

6.52 Overall, this proposal seeks to deliver a design which accords with policy and which can be comfortably accommodated in this location. Having regard to the above considerations, the design, layout and form of the development has been carefully considered in terms of the local context and provides a positive contribution to the streetscene and character of the area.

6.53 The surrounding area is predominantly residential in character with heights typically around two storeys. Whilst the building provides four levels of accommodation internally, one is set within the basement and one within the roofspace and this enables the overall height to be contained within a building that has a maximum height of 3-storeys. As the second floor of accommodation is within the roofspace and served by dormer windows, the majority of the building is set at 2.5 storeys or less with the exception of some small projecting gable sections.

6.54 The mass of the proposed building is further broken up through the use of differing roof and storey heights, stepping down in the appropriate areas of the site to respect both the streetscene and neighbouring properties. It is noted that the proposed extension of the northern wing is 1.5 storeys to keep the height to a minimum. The

proposed extension of the southern wing is part 2, part 2.5, part 3 storeys to ensure it addresses the streetscene along Pield Heath Road appropriately.

6.55 It is considered that the overall height and massing of the building is appropriate in this location, having adopted the same design approach as that which has already been agreed with officers for the approved scheme. This ensures sympathetic integration with the surroundings whilst still responding to and celebrating the corner location of the site to make effective use of the space that is available.

6.56 With the sections facilitating the additional 21 bedrooms, the proposed care home takes the form of a 'C'- shaped building. The building fronts both Pield Heath Avenue and Pield Heath Road, responding to the corner location of the site and establishing a dual frontage. The proposed building will be set back from the frontages of both roads, with the greatest setback being on the corner of the site, extending along the Pield Heath Road boundary. This allows for the provision of an attractive frontage and landscaped edge.

6.57 The submitted fire safety report prepared by 3-FE also demonstrates that the proposal is fire safe.

Proposed Elevations



Elevation 1: South-East facing to Pield Heath Road



Elevation 2: South-West facing to Pield Heath Avenue



Elevation 3: North-West facing to Nr 4 Pield Heath Avenue



Part Section A-A: North-East facing elevation



Elevation 4: North-east facing garden elevation

6.58 Having regard to the above, this proposal is considered to be acceptable in design terms for the following reasons:

- The design, layout and form of the development has been carefully considered in terms of the local context.
- The proposal provides a positive contribution to the streetscene and character of the area.
- The proposal has been designed in order to provide an excellent level of care for future residents with both a high quality internal and external layout.
- It seeks to effectively use the land that is available.
- A high-quality landscaping plan and strategy provides a high quality external private amenity space for residents as well as contributing towards a high quality public realm in a prominent corner location.

6.59 The proposal is therefore considered to accord with adopted Policy BE1 and DMHB11 of the Hillingdon Local Plan; policies D3, D4 D5, D7 and D12 of the London Plan; sections 11 and 12 of the NPPF; and the National Design Guide.

Neighbouring Amenity

6.60 This application is accompanied by a Daylight and Sunlight Assessment prepared by Syntegra.

6.61 It is noted that the scheme has been accepted in terms of neighbouring amenity in the approval

of the 60-bed scheme. For this proposal, it is only the impact of the additional sections that should be assessed, notably for 10 Pield Heath Road and 4 Pield Heath Avenue.

6.62 Due consideration has been given to the amenities of residents occupying neighbouring properties through the positioning of the building, associated landscaping and boundary treatments. The design team has paid particular attention to the residential amenity of properties immediately adjoining the site from the early design stages to ensure that the proposed development respects and is sympathetic to these. The proposed site layout has been designed to avoid harmful impacts on residential amenity, in accordance with adopted local plan policies.

6.63 Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties. In terms of daylight and sunlight impact, the accompanying Daylight and Sunlight assessment assesses this in full and should be referenced to fully. In summary, 53 windows have been assessed within Nos. 1, 3, 4, 5, 7, 9 and 10 Pield Heath Avenue and No. 20 Pield Heath Road for impacts on levels of daylight (VSC),sunlight (APSH), for overshadowing impacts.

6.64 The results of the assessment demonstrates that the proposal would not have a significant impact on any tested window in terms of impacts to

daylight, with all windows expected to experience a negligible impact.

6.65 In terms of sunlight, using Annual Probable Sunlight Hours (APSH) as a measure, for all of the windows tested there would be no noticeable loss in terms of sunlight access and therefore no significant impact is demonstrated in this respect as a result of the proposed development.

6.66 Additionally, none of the amenity spaces tested would experience a significant increase in overshadowing as a result of the development, with all eight gardens tested meeting BRE guidance standards.

6.67 The design team has made considerable efforts to limit overlooking into neighbouring properties through the placement and orientation of windows, the stepping down of the height of the building in the appropriate places and separation distances between facing windows serving habitable rooms exceed 21m. Furthermore, the proposed scheme demonstrates a 6m distance between the new care home and no.10 Pield Heath Road, in comparison, the previous scheme demonstrated a 5m gap between the new care home and no.12 Pield Heath Road. Relatively modest and varied height across the plot, together with sufficient separation distances, that the proposal would not result in a significant loss of outlook or lead to a sense of enclosure for neighbouring residents.

6.68 In terms of the users of the development, the proposed accommodation will be of a high quality and will provide a high-quality living environment, tailored to individuals with advanced needs. Access will be available to outdoor amenity space which includes a large, spacious garden. This will be landscaped to ensure that the garden itself as well as the building and neighbouring properties are not unduly impacted with regards to shade.

6.69 Overall, it is considered the proposed development will safeguard the amenity of its occupants and neighbours in respect to privacy, loss of daylight and sunlight or other impacts and is therefore in accordance with adopted policy BE1 and DMHB11 of the Hillingdon Council Local Plan, polices D3, D4 and D5 of the London Plan and sections 11 and 12 of the NPPF.

Trees, Landscape, Biodiversity and Urban Greening Factor

6.70 This application is accompanied by the following documents:

- Arboricultural Impact Assessment prepared by Syntegra.
- Biodiversity Net Gain (BNG) Metric prepared by Syntegra.
- Preliminary Ecological Appraisal prepared by Syntegra.
- Landscape Strategy prepared by Syntegra.
- Urban Greening Factor prepared by ADG.

6.71 The site will be enhanced through the provision of a high-quality landscaping scheme. This will consist of new tree planting as well as native and ornamental planting, as shown on the submitted landscaping scheme. This has considered the existing context and views of the site with the intention of creating an attractive setting for the new building, whilst also providing attractive usable garden spaces for future residents. The proposed scheme increases the amount of private garden space for residents in comparison to the previously consented scheme, and in addition, provides individual private patio areas to each of the ground floor inward facing bedrooms.

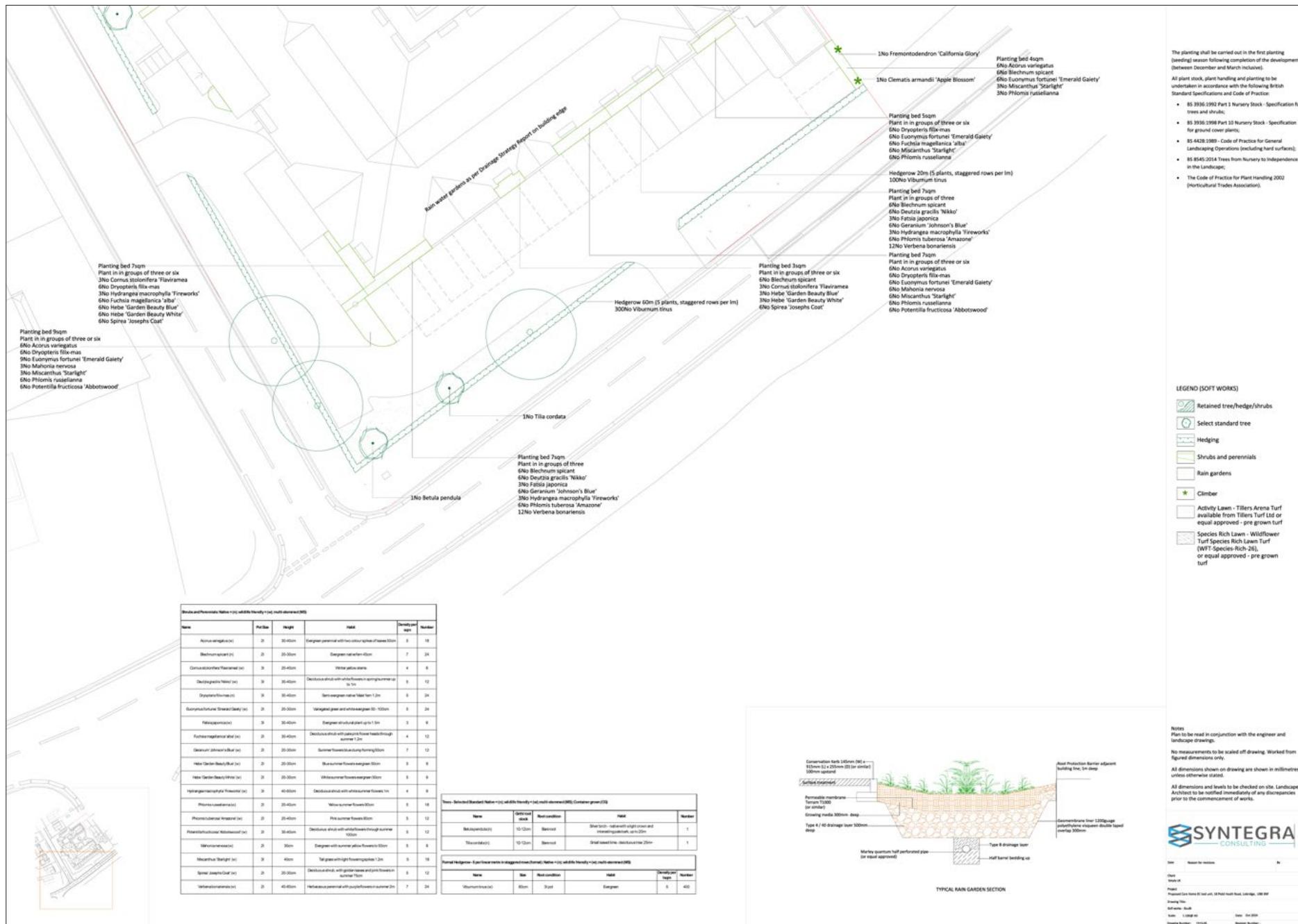
6.72 There are several existing trees within the site and around the edges of the site, none of which are protected by TPOs or Conservation Area designations. The Arboricultural report that accompanies this planning application should be referred in full.

6.73 The starting point is that a number of the trees on the site were assessed and considered under the approved scheme and so a degree of tree loss to facilitate this extant permission has already been accepted by the Council, largely those on the site of 14 – 18 Pield Heath Road and 2 Pield Heath Avenue. The submitted report has identified and assessed the loss of additional trees on the site of No.12 Pield Heath Road required to accommodate the proposed extensions, These are considered to be of limited amenity value, however as a group could be considered to make a minor contribution to the sylvan appearance of the area.

6.74 Where trees are to be lost, this is necessary to facilitate redevelopment, and overall, it is considered that none of the existing trees to be lost could be considered a constraint to development, due to their limited landscape value and contribution. The loss of trees is mitigated by the provision of a high quality landscaping scheme, including 26 new trees across the site.

6.75 In terms of ecology, the submitted Preliminary Ecological Appraisal undertaken by Syntegra has assessed the ecological value and potential impact upon the site of no. 12 Pield Heath Road. The site facilitating the consented 60 bed scheme has not been assessed any further in this regard as this has been previously considered and approved and development on site has commenced. The assessment concludes that the habitats on site are considered to be of low-to-moderate ecological value and the presence of protected species is of also of low-to-moderate potential and as such concludes that the value of the site to wildlife is to be lower at the Parish scale. The report goes on to conclude that in terms of impact, the proposed development will not cause negative impacts on local wildlife and will ensure connectivity within the wider landscape, provided the recommended avoidance, mitigation and enhancement measures are adopted.

6.76 The proposed scheme is predicted to achieve a UGF score of 0.35 as shown on the accompanying landscape plan through a range of on-site measures, which will manifest a range of benefits such as improved health for future occupiers, climate change adaption and biodiversity conservation.



Soft landscaping plan 2

6.77 It is noted that the 0.4 target is for a purely residential development as set out in Policy G5 of the London Plan and that this is for a care development within Class C2. Additionally, the scheme, represents biodiversity net gain in accordance with the requirements and for the purposes of the Hillingdon Local Plan.

6.78 With regards to biodiversity net gain, the BNG metric has been prepared and completed by Syntegra and concludes that An increase of +0.52 habitat and +0.02 hedgerow units was identified following the completion of baseline and post-development calculations. Biodiversity Net Gain is achieved via the creation of scattered trees, grassland habitats introduced shrubs throughout the proposed development. The development sees a +94.41% increase in habitat biodiversity units and a +66.49% increase in hedgerow units.

6.79 Due to the loss of an existing pond, the BNG score shows that the trading rules are not satisfied. Given the space available and the nature of the use, the provision of a replacement pond is not possible. A pond would give rise to a health and safety risk for vulnerable care home residents. This is considered to be mitigated by the wider BNG that would be achieved as a result of the proposed development.

6.80 It is therefore considered that the net gain in biodiversity units shown to be possible as part of this development meets the current requirements of both national (NPPF) and local policy (Hillingdon Local Plan); as well as the Government's mandatory 10% increase in Biodiversity Net Gain as outlined within the Environment Bill.

6.81 Overall, the ecological implications of the proposed development have been properly considered and it is demonstrated that subject to the recommendations outlined in the reports, any ecological impacts can be appropriately managed. There will be no adverse impact on protected and high-quality trees. Furthermore, there will be an overall enhancement and net gain in biodiversity as part of the proposal and an appropriate UGF score is achieved for this type of development. Therefore, the development will be in accordance with Policies EM7, DMHB14, DMEI7 of the Hillingdon Local Plan policy, G5 of the London Plan and section 15 of the NPPF.

Flood Risk and Drainage

6.82 This planning application is accompanied by a Flood Risk Assessment and Drainage Strategy prepared by Syntegra.

6.83 Policy SI 12 of the London Plan (Flood risk management) sets out that flood risk across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities and developers where relevant. Proposals should further ensure that flood risk is minimised and mitigated, and that residual risk is addressed. In addition, Policy SI 13 of the London Plan (Sustainable drainage) sets out that proposal should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

6.84 The assessment and report prepared by Syntegra confirms that the application site falls within flood zone 1, which is at the lowest risk of flooding, and is also not located in an area identified as being at risk of surface water flooding. Moreover, the application site is already extensively developed with limited attenuation of run off. The proposed drainage strategy for the proposed development is proportionate to the scheme's size and aims to maximise the opportunities available for sustainable water management on-site and would result in betterment to the existing sites conditions.

6.85 The drainage strategy prepared by Goodsons details how foul and surface water will be managed.

6.86 For surface water, natural infiltration has been discounted due to the presence of made ground and London Clay formation. A connection to the River Pinn has also been discounted due to the distance between this and the site. It is proposed that a new traditional gravity pipe is installed to service new areas of roof and hardstanding. Source control SuDS measures will be provided in parking bays, aisles and access roads to provide treatment mitigation. Vortex controls will attenuate surface water flows to the equivalent pre-development greenfield runoff rates and underground cellular storage tanks will provide surface water attenuation for rainfall events up to and including the 100 year return period with 40% climate change allowance. A final surface water connection to the Thames Water drainage asset is proposed.

6.87 Based on the above, the proposed development is considered to comply with policies Policy EM6 and EN8 of the Hillingdon Local Plan, SI 12 and SI 13 of the London Plan and section 14 of the NPPF.

Access and Highways

6.88 This planning application is accompanied by a Transport Statement and Travel Plan prepared by Syntegra and these should be referred to in full.

6.89 The starting point is that the proposed access is as per the approved scheme. In line with this, vehicles will enter via Pield Heath Avenue and leave via Pield Heath Road. This arrangement has already been accepted by the Council.

6.90 Appropriate visibility splays can be accommodated and the vehicle swept path analysis demonstrates that the internal site arrangement can satisfactorily cater for services, refuse collection and emergency vehicles without hindrance, by allowing these vehicles to enter and leave the site in a safe and convenient manner. Dedicated bays are also proposed for an ambulance and a delivery vehicle.

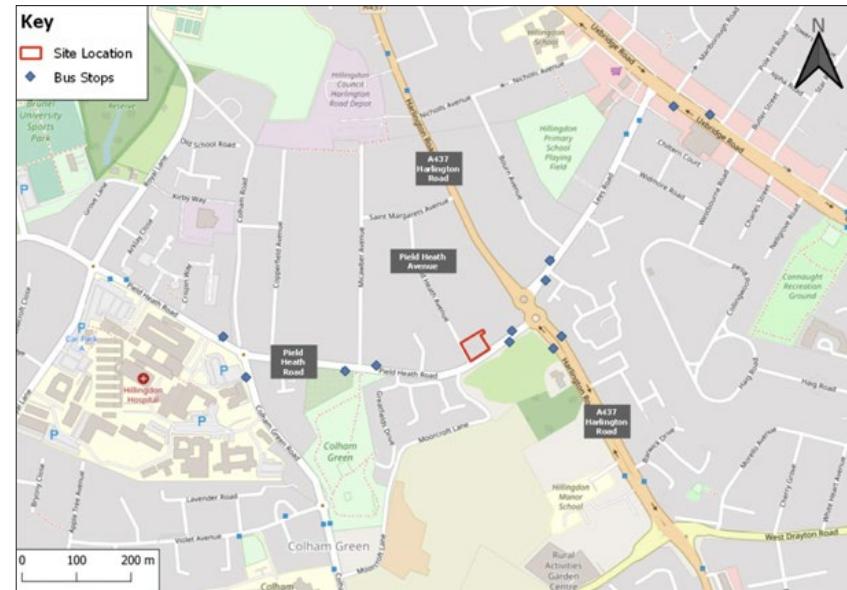
6.91 The proposed care home site is anticipated to produce a total of 45 two-way person trips during the AM peak hour (08:00-09:00), of which 16 would be undertaken by single occupancy car, 13 on-foot, nine by bus, three car passengers and two by train. During the PM peak hour (17:00-18:00) a total of 31 two-way trips are anticipated including

nine by single occupancy car, 13 on-foot, four car passengers, four by bus and one by train.

6.92 Of the 441 total daily person trips estimated to be generated, 158 of these are anticipated to be made by car, 142 on foot, 71 by bus, 51 as car passengers, 14 train, four by taxi and one by cycle.

6.93 Whilst there will be a net increase in trips generated as a result of the proposed development, this is modest and not significantly greater than those associated with the approved scheme. It is considered that there will be a negligible impact on the local highway network, public transport network, and local walking and cycling infrastructure. As such it can be concluded therefore that the development proposed would not result in a severe residual cumulative impact, nor would the development create an unacceptable impact on highway safety.

6.94 In terms of parking Whilst there are no specific car parking standards for care homes described in the London Plan, the parking standards outlined Table 1, Appendix C of the Hillingdon Local Plan: Development Management Policies sets out that 1 car parking space for every 4 bedrooms, together with space for a warden, emergency vehicle parking and delivery or service vehicle parking should be provided. Based on the proposed scheme which provides 81-bedrooms, a total of 19 parking spaces including 3 wheelchair accessible spaces and 4 active electric vehicle charging points, alongside an ambulance bay, delivery bay, 12 cycle spaces and 4 mobility scooter spaces.



6.95 Taking into account the accessible nature of the site, proximity to a residential catchment area for staff, and proximity to public transport services, the provision of 19 spaces is considered to be a suitable and policy compliant provision which balances the need to accommodate car parking on site whilst also encouraging active travel and sustainable travel choices from the outset.

6.96 Based upon the above, the proposed development is therefore considered to accord with policy EM1 and DMT6 of the Hillingdon Local Plan, T1, T2, T5 and T6 of the London Plan and Section 9 of the NPPF.

Sustainability and Energy

6.97 This application is supported by an Energy Strategy Report prepared by Syntegra, and should be referred to in full.

6.98 Policy SI 2 of the London Plan states that major development should be net zero-carbon. Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided either through a financial contribution to the Council's offset fund or off-site provided an alternative proposal is identified, in agreement with the Council. In addition, Policy SI 3 of the London Plan states that all major development proposals shall explore opportunities to maximise the use of on-site renewable energy generation and incorporate demand-side response measures and Policy EM1 of the Hillingdon Local Plan sets out that the installation of renewable energy will be encouraged for all new developments.

6.99 The report which accompanies this application confirms that the proposed development is able to meet the overall criteria of the national and local policies i.e. >35% reductions over part L through the implementation of a better performing thermal envelope as well as high energy efficiency building services.

6.100 The Government has outlined its ambitions for residential and non-domestic developments to be delivered to a zero-carbon standard. It is anticipated that zero carbon development will be realised predominantly through energy efficiency measures and the use of on-site low or zero carbon energy and connected heat. However, it is recognised that it will be difficult to deliver all the carbon savings necessary to meet zero carbon standards on site through these measures alone.

6.101 Given the proposed scheme would not achieve zero carbon, it is understood that an offsite financial contribution will need to be negotiated with the Council and secured through an obligation within a s106 agreement, as per the previously approved 60-bedroom scheme on the subject to viability considerations.

6.102 It is therefore considered that the proposed development complies with Policies EM1, EM11 and DMEI2 of the Hillingdon Local Plan policy SI 2, SI 3 and D11 of the London Plan, section 12 and 14 of the NPPF, section 15 of the NPPF and the national design guide.

Air Quality

6.103 An Air Quality Assessment prepared by Syntegra, has been submitted with this application and should be referred to in full in this respect.

6.104 Policy SI 1 of the London Plan states that proposals should not lead to further deterioration of existing poor air quality or create any new areas

that exceed air quality limits. Policy EM8 of the Hillingdon Local Plan requires all developments to not result in the deterioration of local air quality. In addition, all major developments within Air Quality Management Areas (AQMAs) are expected to be air quality neutral. The site is located within the London Borough of Hillingdon AQMA and within the catchment area of two AQFAs (Hillingdon Hospital FA, 345 metres away) and (Uxbridge Road, 452 metres away). Furthermore, Policy DMEI 14 of the Hillingdon Local Plan requires active financial contributions towards the continued improvement of air quality, especially within the Air Quality Management Areas and Focus Areas.

6.105 The submitted Air Quality Assessment demonstrates that the proposed development will be Air Quality Neutral. However, as per the previously approved scheme on the site, it is acknowledged that as the site is located within the catchment area of an AQFA, proposed development in these areas are required to be Air Quality Positive. As such, an offsite financial contribution will need to be negotiated with the Council, as per the previously approved 60-bedroom scheme on the site, in order to achieve Air Quality Positive, subject to viability considerations.

6.106 It is therefore considered that the proposed development is considered to comply with Policies EM8 and DMEI 14 of the Hillingdon Local Plan, Policy SI 1 of the London Plan and section 15 of the NPPF.

Noise

6.107 This application is accompanied by a noise impact assessment prepared by Syntegra and should be referred to in full.

6.108 The site is located in a predominantly residential area. The noise climate of the surrounding area is dominated by road traffic noise along the A437 to the east and Pield Heath Road to the south as well as the surrounding road network. In this respect the proposed development has been designed as to mitigate against noise through careful consideration of the building envelope. The façade build up will be a standard brick and block construction (or equivalent) to achieve a level of approximately 55 dB. For façades that overlook Pield Heath Road specifically, a double glazing system in a 6/12/6.4 configuration (or equivalent) will be installed to give a Sound Reduction Index (SRI) of 34 dB Rw. Appropriately specified acoustic trickle vents, with a Dn,e,w of at least 40 dB and an alternative means of ventilation will be installed to allow adequate ventilation without the requirement to open windows. For all other façades a typical double glazing system in a 4/12/6 configuration (or equivalent) will be installed to give a Sound Reduction Index (SRI) of 28 dB Rw. Appropriately specified acoustic trickle vents, with a Dn,e,w of at least 34 dB, or an alternative means of ventilation will be installed to allow adequate ventilation without the requirement to open windows.

6.109 Furthermore, the assessment has also shown that the external noise level criteria would be achieved in both the resident garden and the second floor terrace area.

6.110 Overall, it has been shown that, through careful consideration of the building envelope construction, the proposed development should avoid future residents being exposed to harmful levels of noise. It can therefore be concluded that significant adverse impacts on the health or quality of life of those future residents would be avoided.

6.111 It is therefore considered that the proposed development complies with policy EM8 of the Hillingdon Local Plan, D13 and D14 of the London Plan and section 15 of the NPPF.

Ground Conditions

6.112 As per the previously approved 60-bed scheme on the site, the site has been used for residential habitation for many years. There is no evidence that the site has ever been used for any uses that would likely lead to contamination of the site and as such, there are no specific contamination issues.

6.113 For the approved scheme, the Council's Land Contamination Officer was consulted on the development at the site and raised no concerns. A condition (condition no.16) was however imposed on the approved 60-bed scheme, which ensured that prior to their use on site, all imported soils were tested for chemical contamination, and the results of this testing shall be submitted to, and approved in writing by the LPA. Further, no contaminated soils or other materials were to be imported to the site.

6.114 The proposed development is therefore considered to comply with Policy EM8 of the Hillingdon Local Plan and section 15 of the NPPF.

The Planning Balance

7.1 On the basis of the analysis set out in the above section, it is considered that the proposed development comprises sustainable development in the context of the policies set out within the NPPF and accords with the Development Plan.

7.2 It is considered that planning permission should be granted for this proposal. In summary, the proposal is considered to give rise to social, environmental and economic benefits.

Social Benefits

7.3 There is a significant shortfall of market standard beds (with wet room provision) in the local area which this proposal seeks to address. This proposal provides an opportunity to enhance provision with the borough, ensuring that there are enough care beds for local people in the context of an ageing population. The provision of care homes remains an important part of the overall care provision in the area and is particularly important for those with advanced needs such as dementia.

7.4 It is also noted that the provision of care beds contributes to overall housing land supply (the equivalent of 45 dwellings in this case using the standard 1.8 ratio) and the release of family accommodation in the open market.

7.5 There are further social benefits in the form of savings to the NHS as a result of 'bed blocking' within hospitals and reduced falls at home in addition to improved wellbeing and a reduction in loneliness for residents.

7.6 It is considered that **significant weight** should be assigned to the wide-ranging social benefits of the scheme.

Environmental Benefits

7.7 The site is located in a sustainable location, within walking distance of local amenities and accessible by non-car modes. It seeks to make effective use of previously developed land and to deliver a high-quality design which will significantly enhance this site.

7.8 The proposal comprises a well-designed and high-quality building, which is entirely appropriate to its context in terms of urban form and materials. The building is of a scale that responds to the surrounding area and respects the amenity of neighbouring properties. Residential amenity of both existing and proposed residents is protected and a high-quality building is proposed for this location.

7.9 The proposal seeks to secure a biodiversity net gain of 94.41% for habitats and 66.49% for hedgerow units. These figures are significant and will be delivered through new landscaping and ecological enhancements.

7.10 It is considered that **significant weight** should be assigned to the wide-ranging environmental benefits of the scheme.

Economic Benefits

7.11 The proposed development will result in short term construction jobs and a subsequent uplift in general productivity within the local area.

7.12 Circa 38 (38 FTE) long-term jobs will be associated with the care home in addition to further indirect jobs in a range of positions including administration, management, care and maintenance.

7.13 The proposal will also generate wider economic impact including income generated in the local economy. In the current climate, this is particularly important.

7.14 It is considered that **significant weight** should be assigned to the wide-ranging environmental benefits of the scheme.

7.15 The proposed use is acceptable in principle in this location and the technical assessment work undertaken in support of the application confirms that there are no other material considerations which suggest any harm would outweigh the benefits of the proposed development. The benefits are extensive and weigh heavily in favour of the scheme.

7.16 On this basis, and taking into account the significant benefits arising from the scheme, it is respectfully considered that planning permission should be granted.

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Gillings
Planning

Our Values

-  We believe in happiness
-  We do the right thing
-  We make it personal
-  We make a difference