
Town Planning Statement (including Affordable Housing Statement)

148-154 High Street, Uxbridge, UB8 1JY

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1. Introduction

- 1.1. This Planning Statement has been prepared on behalf of DNA (Uxbridge) Limited (“the Applicant”) to support a full planning application seeking permission for the demolition of existing buildings to provide a mixed-use development at 148-154 High Street, Uxbridge, UB8 1JY (“the Site”).
- 1.2. The proposed development comprises Hotel (Class C1), Co-Living (Class Sui Generis) and replacement Commercial Floorspace (Class E). Alongside these uses, the proposed development will provide a new publicly accessible pocket park, alongside other public realm improvements, basement car parking and associated infrastructure.

Description of Development

- 1.3. The planning application seeks full planning permission for:

“Demolition of the existing buildings and comprehensive redevelopment of the site to provide a mixed use development comprising hotel (Class C1), co-living (Class Sui Generis) and replacement commercial floorspace (Class E) alongside public realm improvements, including a new pocket park, basement parking and associated infrastructure.”

Accompanying Reports

- 1.4. This Planning Statement describes the development proposals and relates them to the relevant planning policy framework. It should be read in conjunction with the accompanying application drawings and the following technical reports:

- Air Quality Assessment, prepared by AQA Limited;
- Biodiversity Net Gain Assessment, prepared by Arbtech;
- Circular Economy Statement, prepared by Savills Earth;
- Contaminated Land Survey, prepared by PPA;
- Daylight / Sunlight Assessment, prepared by Point 2;
- Internal Daylight Assessment, prepared by Point 2;
- Demolition and Construction Method Statement, prepared by DSM;
- Design and Access Statement (including brief statement on 10 Model Design Code Principles, Accessibility Statement and Waste Management Plan), prepared by Child Graddon Lewis;

- Preliminary Ecological Assessment, prepared by Arbtech;
- Employment Needs Assessment, prepared by Savills Economics;
- Energy Report, prepared by Ridge;
- BREEAM Pre-Assessment, prepared by Ridge;
- Financial Viability Assessment, prepared by Newsteer;
- Fire Statement, prepared by Jensen Hughes;
- Flood Risk Assessment and SuDs Statement, prepared by Edge;
- Heritage Statement, prepared by Orion Heritage;
- Landscape Strategy (including Urban Greening Factor), prepared by Oobe;
- Noise and Vibration Impact Assessment, prepared by Spectrum Acoustics;
- Plant and Ventilation Report, prepared by Ridge;
- Statement of Community Involvement, prepared by Cratus;
- Transport Assessment, prepared by Caneparo Associates;
- Residential Travel Plan, prepared by Caneparo Associates;
- Hotel Travel Plan, prepared by Caneparo Associates;
- Delivery and Services Plan, prepared by Caneparo Associates;
- Outline Construction Logistics Plan, prepared by Caneparo Associates;
- Utilities Survey / Infrastructure Assessment, prepared by Edge;
- Whole Life Carbon Assessment, prepared by Ridge;
- Wind Mitigation Assessment, prepared by RDWI.

2. Site and Surroundings

The Site

- 2.1. The 0.38 ha site is located within Uxbridge Town Centre in the London Borough of Hillingdon. It is situated on a prominent corner plot fronting a pedestrianised section of Uxbridge High Street and is bound by Belmont Road to the north, Bakers Road to the east and Cocks Yard to the south.
- 2.2. The Site currently comprises of office floorspace and primarily retail accommodation (Use Class E) extending to just over 5000 sqm. Existing retail units on site are let to various well-known brands, including WH Smiths, OXFAM, Card Factory, Halifax and Greggs. The site is centred around a central service yard which also provides access to a public basement car park underneath.
- 2.3. To the west is a large indoor shopping centre, known as ‘the Pavilions’. This building comprises commercial (Class E) uses on the ground floor with two 8-storey residential tower blocks, namely Armstrong House and Middlesex House extending above. To the east of the Site, along Belmont Road is Senator Court, a modern office accommodation, and to the south-east of the Site exists a 9-storey hotel (Class C1).
- 2.4. The Site benefits from site allocation SA26: ‘148-154 High Street / 25-30 Bakers Road, Uxbridge’, within Part 2 of the borough’s Local Plan. This allocation identifies the Site as suitable for a residential-led mixed use re-development, subject to (inter alia): the provision of upper floor residential units; the provision of main town centre uses to provide active frontages along Bakers Road and Belmont Road; retention of ground floor retail uses fronting the High Street; and the enhancement of the pedestrian thoroughfare of Cock’s yard linking Uxbridge Town Centre and the Bus Interchange.
- 2.5. The Site is not within a Conservation Area but is situated between the Old Uxbridge and Windsor Street Conservation Area. There are no statutory listed buildings on site, but there are several Grade II listed buildings to the north and south of the site, including Uxbridge Underground Station (Grade II), several telephone boxes (Grade II) and also the Crown and Sceptre Public House (Grade II). The site also falls within an Archaeological Priority Area.
- 2.6. The Site has a PTAL rating of 6a and is highly accessible to key transport routes for the surrounding area and into Central London. Uxbridge Underground Station is located 50m to the south of the Site and is served by the Piccadilly and Metropolitan lines. Both Denham and West Drayton Overground stations are

located c. 3 miles from the Site, the latter of which is also served by the Elizabeth line, providing direct access into Central London within 25 minutes. The Site benefits from a well-connected bus network and road network, with the M40, M25 and M4 in the vicinity.

- 2.7. According to the Environmental Agency's Flooding Map, the Site is situated within Flood Zone 1, where there is a low risk of flooding with the site having an annual flood probability between 0.1-1%.

3. Planning History

- 3.1. A desktop search of the London Borough of Hillingdon's Council online planning register has identified the following planning history for the Site and surrounding area.

Table 1: Relevant Planning History on site

Address / Ref	Proposal	Status / date
72722/APP/2019/347 25-30 Bakers Road	Demolition of existing buildings and redevelopment to provide a new hotel and retail unit, restaurant and refurbishment of part of the existing car park and service area	Withdrawn 20/10/20
57765/APP/2005/2279 26 Bakers Road	Erection of a first floor rear extension to be used as a beauty salon in connection with ground floor beauty salon.	Granted 08/08/05
44517/D/95/196515 3 High Street	Change of use from Class A1 (Retail) to Class A2 (Financial and Professional Services).	Granted 28/12/95

Table 2: Relevant Planning History adjacent to site

Address / Ref	Proposal	Status / date
27298/APP/2020/3753 Unit 2, Colham House, Bakers Road	Change of use of the vacant Metropolitan Police Safer Neighbourhood Unit (Use Class E) at ground floor level to hotel use (Use Class C1) to provide a restaurant and bar ancillary to the main hotel use	Granted 01/02/21

68385/APP/2012/2398 Senator Court, Belmont Road, Uxbridge, UB8 1RZ	Part demolition, part extension and refurbishment of existing building to provide modern office accommodation (Class B1) totalling 20,267sqm GEA (including car park and plant areas) of which 516sqm GIA floorspace to be used interchangeably for Class A1, A2, A3, B1 uses, and associated works at Senator Court, Belmont Road, Uxbridge, UB8 1RZ in accordance with the terms of the application, Ref 68385/APP/2012/2398, dated 1 October 2012.	Granted (at appeal) 26/03/14
42966/APP/2013/908 The Chimes Shopping Centre, High Street, Uxbridge	Creation of a new Class A3 (Restaurants and Cafes) unit and extension to Centre Management Suite within Chimes Shopping Centre involving an extension to Cinema/Service Level and part change of use from Use Class B1 to Use Class A3.	Granted 11/06/13
43742/APP/2006/252 Armstrong House and Middlesex House, The Pavilions, High Street	Change of use of 2 existing five storey office blocks above ground/mezzanine floor shopping centre and erection of a new upper floor on each building to provide 160 residential units above the existing shopping centre, relocation of entrance to block 5 (Armstrong house) and re-use of entrance to block 6 (Middlesex house).	Granted 04/07/07
27298/APP/2006/875 Colham House, Bakers Road, Uxbridge, UB8 1SS	Erection of a nine storey building incorporating class A1-A5 uses at ground floor level and class c1 (hotel) on floors 1 to 8 inclusive (involving demolition of Colham house).	Granted 12/01/07

- 3.2. No other applications were identified that were considered relevant to the Site or the Proposed Development.

4. Pre-Application Engagement

- 4.1. This section provides a summary of the pre-application consultation and engagement undertaken by the Applicant prior to the submission of this application.

Pre-application Engagement

- 4.2. The importance of pre-application consultation and engagement is emphasised in the National Planning Policy Framework (“NPPF”) (December 2023) and in the accompanying Planning Practice Guidance (“PPG”). The NPPF highlights that there is significant potential to improve the efficiency and effectiveness of the planning application system for all parties through early engagement. NPPF Paragraph 39 states:

“Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

- 4.3. The NPPF urges local planning authorities to encourage developers to engage with them prior to the submission of a planning application and also encourages engagement with local communities. The PPG similarly encourages pre-application consultation and engagement. It states that the approach to pre-application engagement needs to be tailored to the nature of the proposed development and the relevant issues.
- 4.4. Having regard to this clear guidance, the Applicant has undertaken extensive pre-application consultation with LBH Planning, Transport, Design and other Technical Officers to date. The Council have confirmed their support for the principle of redevelopment and commercial mixed-use development in this location, subject to high design quality being delivered.
- 4.5. A summary of the key points raised as part of the pre-application engagement are included in the below section.

Consultation with Local Planning Authority

Council Pre-Application Advice

- 4.6. Numerous pre-application meetings have been held between the Council and Applicant team throughout the proposal’s evolution. These were undertaken in August 2023, November 2023, 8 January 2024 and 26 January 2024.

- 4.7. Each time, these meetings reaffirmed that the principle of development in this location is supported, with the Council positively responding to the proposal's desire to regenerate the site with significant public benefits for both residents and the local economy.
- 4.8. Support for the co-living scheme has been reiterated throughout this engagement, noting particularly the site's town centre location and high level of accessibility and surrounding infrastructure. The pre-application advice has also confirmed that the principle of hotel development at the site is supported as the site is located within an area for hotel growth.
- 4.9. Noting the site as a prominent corner plot, support has been given to re-providing commercial retail units at ground floor level. Extensive engagement has been undertaken with LBH to shape the layout and appearance of these units. A strong preference was noted for double-height frontages to ensure that these units retain highly active frontages in conformity with the surrounding streetscape.
- 4.10. Discussions with LBH have also informed the design of the proposed vehicular ramp to access the disabled car parking and cycle parking situated within the basement, the design, appearance and materiality of the proposed development and the design of the broader public realm and other public offerings. It has been reiterated that the proposals should be designed to ensure that the future redevelopment of land to the south is not prejudiced. This has been considered by the Applicant throughout the development of the proposals.

Consultation with GLA

GLA Pre-App – 1 February 2024

- 4.11. The pre-application meeting with the GLA was positive. They provided confirmation that the principle of development in this location could be considered acceptable in land-use terms, subject to meeting the other relevant London Plan policies. It is the intention that the various relevant policies will be addressed through the planning submission.
- 4.12. Other comments relating to various considerations including design, heritage, transport and sustainable development matters were raised which have been considered in detail and have informed the various documents submitted to support this application.

Consultation with Design Review Panel

The Design Review Panel – 31 January 2024

- 4.13. Consultation with The Design Review Panel reiterated support for the proposed uses on site and also provided support for the aspiration of high density design, subject to the identified constraints. It was considered that the proposed layout of the development would not prejudice the development of the adjacent site.
- 4.14. Further comments were raised on the design of the proposed development and further evidence to support the design choices was requested, which is provided within this planning application. Further information on the proposed landscaping was also requested, which has also been prepared to support this application.

Resident, Public and Local Stakeholder Consultation

- 4.15. Consultation with the local community and other key stakeholders has been a key priority in advance of submission. A drop-in session was held at the site on Tuesday 30th January to provide local residents and stakeholders with the opportunity to provide feedback on the development proposals and discuss them with the Applicant and consultant team directly. This event was attended by the Applicant and consultant team and advertised through a leaflet drop.
- 4.16. A website was also launched on 23rd January to provide information on the scheme and provide another avenue for local residents to provide feedback in addition to the in-person consultation event.
- 4.17. Overall, 57 no. people attended the drop in event with the majority of respondents provided feedback in support of the proposals. Full details of the feedback received is provided in the Statement of Community Involvement, prepared by Cratus.
- 4.18. The Applicant has also undertaken engagement with several political and community stakeholders including Councillor Ian Edwards, Councillor Eddie Lavery, Councillor Tony Burles, Councillor Keith Burrows, Councillor Farahd Choubedar, Steve Tuckwell MP, Baron Randall, Onkar Shaota, North Uxbridge Residents Association, Uxbridge BID and Hillingdon Chamber of Commerce, who were all informed of the community consultation and the proposed development via letter. Meetings were hosted with Steve Tuckwell MP on 6th February 2024, Hillingdon Chamber of Commerce on 6th February 2024 and Councillor

Eddie Lavery on 14th February 2024. Further information is provided in the Statement of Community Involvement, prepared by Cratus.

5. The Proposed Development

- 5.1. This section describes the Proposed Development. It should be read in conjunction with the Design and Access Statement, application drawings and other documents submitted in support of this application.
- 5.2. The proposals comprise the demolition of the existing buildings and structures on site to provide a mixed-use development comprising hotel (Class C1), co-living (Class Sui Generis) and replacement commercial floor space (Class E). The proposals includes landscape improvements including the provision of a new pocket park, car and cycle parking and associated infrastructure.
- 5.3. The description of development is as follows:

“Demolition of the existing buildings and comprehensive redevelopment of the site to provide a mixed use development comprising hotel (Class C1), co-living (Class Sui Generis) and replacement commercial floorspace (Class E) alongside public realm improvements, including a new pocket park, basement parking and associated infrastructure.”

E Class Commercial Use

- 5.4. The Proposed Development includes the re-provision of 1,115 sqm of high-quality commercial floorspace along the ground floor of Uxbridge High Street and part of the frontage along Belmont Road. It is the intention that this floorspace will be used for retail units to contribute to the activation of Uxbridge High Street and Belmont Road.
- 5.5. The commercial floorspace has been designed to incorporate a mezzanine level to maximise the retail floorspace and also integrate a double-heighted frontage to create a high-quality environment.

Hotel Use

- 5.6. The Proposed Development will accommodate a high-quality hotel overlooking Uxbridge High Street, comprising 162 no. new hotel bedrooms.
- 5.7. In order to maximise the commercial frontage at ground floor, the primary hotel access will be via Belmont Road with the reception and other front-of-house facilities situated on the eighth floor of the hotel. This strategy has been developed in discussion with the prospective hotel operator and with reference to a number of successful precedents elsewhere.

- 5.8. The eighth floor of the hotel includes the hotel lobby and reception area. It also includes ancillary office, kitchen, bar, storage areas and an external terrace for guests to use.

Co-Living Use

- 5.9. The Proposed Development will deliver 320 no. co-living units along Bakers Road and Belmont Road to significantly expand the housing offer of Uxbridge Town Centre. These will be delivered in a mix of private studios measuring between 19 and 24 sqm and private accessible studios measuring between 31 and 36 sqm. 10% of units will be delivered as accessible, equating to a provision of 32 units.
- 5.10. A living-kitchen-diner communal space is provided in the north-east corner of each of the co-living floors. The provision equates to 0.8 sqm kitchen space per resident and 4 spaces per cooking station. Further co-living amenity space is provided at ground floor along Bakers Road to activate the frontage and also provide a through-connection to the central courtyard / pocket park. Space for other ancillary co-living amenity uses, including a gym, cinema room and co-working space is provided in the basement. The proposed development will deliver an average amenity provision of 4.1 sqm. Further external amenity space is provided atop of the co-living flank fronting Belmont Road, this equates to an additional c. 2 sqm of external amenity space per resident.

Design

- 5.11. The proposed development has been designed by architects, Child Graddon Lewis, and has evolved through careful consideration of the local context and adjacent Old Uxbridge and Windsor Street Conservation Area.
- 5.12. The design enhances the prominent corner plot with a U-shaped building with heights varying between 8 and 10 storeys across its northern, eastern and western flanks. The western flank fronting Uxbridge High Street incorporates a double-height frontage at ground floor to provide an attractive, commercial frontage which is demarcated with the colonnade. This western flank rises to a total of 9-storeys and the top 2-storeys are set-back with a mansard appearance to reduce the bulk of the building. This height and massing continues around the corner of Uxbridge High Street and Belmont Road.
- 5.13. The northern flank fronting onto Belmont Road continues the appearance of the double-height frontage at ground floor and rises to a height of 8-storeys. The eastern flank fronting onto Bakers Road sits at a maximum height of 10-storeys at the corner with Belmont Road and along the northern portion of Bakers

Road before reducing to 9-storeys at its southern edge. The massing at this corner is further reduced with the top storey maintaining a mansard appearance.

- 5.14. The Site's southern boundary will remain open, enabling the expansion of Cocks Yard onto a new publicly accessible pocket park at ground floor level. This new park will incorporate significant public realm and landscaping enhancements, which are detailed further in the landscaping drawings prepared by Oobe.

Inclusive Design

- 5.15. The proposed hotel will provide a total of 9 no. accessible rooms and 8 no. ambulant standard rooms, which equates to 11% provision. In addition, the proposed development includes 7 no. adaptable family rooms, which could be converted in the future, increasing the provision to 15%.
- 5.16. The co-living scheme will provide 32 no. accessible units, equating to 10% provision.

Vehicular and Pedestrian Access

- 5.17. At ground level, three new pedestrian entrances are proposed to the central pocket park to generate greater connectivity between Belmont Road, Bakers Road and Uxbridge High Street. These have been designed to open up the existing route along Cocks Yard to deliver an enhanced public realm and pedestrian experience, and also generate greater connectivity with the existing transport hubs. Each of the pedestrian accesses have been designed to incorporate an arch and have been informed by a number of successful precedents, which are set out further in the Design and Access Statement.
- 5.18. Primary Vehicular Access to the Site will be from Bakers Road approximately where the existing Cocks Yard is located. The vehicular access will be formed of a single-way working ramp with space at the top and bottom for vehicles to pass one another; it will be controlled by traffic signals and will serve accessible car parking and cycle parking only. Access to the basement long-stay cycle stores will be achieved using either the vehicular access or a dedicated cycle lift accessed from within the proposed courtyard.

Parking

- 5.19. The Proposed Development is designed to be car-free, save for 9 no. accessible car parking spaces which will be situated in the basement car park. 4 no. of the accessible spaces will be for the co-living use and 5 no. will be for the hotel use. It is the intention that 20% of the disabled parking bays have EV charging facilities.

- 5.20. In terms of the cycle parking provision, a total of 263 long-stay spaces will be provided plus an additional 24 short-stay spaces. Of the 263 spaces provided, 240 are associated with the co-living use; 9 are associated with the hotel use and 14 with the commercial use.

Refuse and Servicing

- 5.21. 2 no. dedicated refuse stores are provided on the ground floor to support the co-living use. All servicing activity will occur on-street, using the proposed loading bay on Belmont Road, or the proposed double-yellow line restrictions available on Baker's Road.
- 5.22. A further refuse store is provided for the hotel use along Belmont Road. For the commercial units, it is anticipated that the waste will be managed within the various units.
- 5.23. Further information on the proposed refuse and servicing strategy is provided in the Design and Access Statement.

New Pocket Park and Landscaping

- 5.24. A Landscaping Strategy has been prepared by Oobe and has been submitted to support the planning application. As referred to above, it details that a new publicly accessible pocket park which has been designed to improve the pedestrian connectivity between Belmont Road, Bakers Road and Uxbridge High Street, and deliver high-quality public realm. Approx. 2,070 sqm of the ground floor has been provided as public open space.
- 5.25. A variety of soft landscaping features will be introduced in the form of lawns, ornamental planting beds, wildflower meadow, trees and shrubbery are integrated to soften the built environment and introduce new green space within Uxbridge Town Centre.
- 5.26. Whilst improving pedestrian connectivity, this pocket park will also provide a high-quality space with seating for relaxation and space for consumer spill out from the adjoining commercial units. There is the intention that this amenity space will be flexible to a variety of uses including market stalls and outdoor cinema screenings to help activate the space and draw in pedestrians from the surrounding high street. Short-stay publicly accessible cycle storage will also be provisioned within this space.
- 5.27. Subject to negotiations with the landowner, the street frontage along Belmont Road could be upgraded to improve the pedestrian experience.

6. Planning Policy Context

- 6.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, any future revised application will be required to be determined in accordance with the Development Plan for that area, unless any material considerations indicate otherwise.
- 6.2. For the purposes of this application, the Development Plan for the Site comprises:
- The London Plan (“LP”) (March 2021);
- 6.3. The Hillingdon Local Plan consisting of two parts:
- Strategic Policies (adopted November 2012) (“HLP1”)
 - Development Management Policies and Site Allocations, Designations and Policies Map (both adopted January 2020) (“HLP2”)
- 6.4. Material considerations include: National Planning Policy Framework (“NPPF”) (December 2023); Planning Practice Guidance (PPG); regional and local supplementary guidance / documents (SPG/ SPDs) including and any other site specific circumstances.

National Planning Policy Framework (December 2023)

- 6.5. The NPPF was most recently updated in December 2023. The NPPF sets out the Government’s planning policies for England and how these should be applied.
- 6.6. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). Sustainable development is defined as having three dimensions: social, economic and environmental and the NPPF outlines that the planning system should work towards them in mutually supportive ways.

Planning Practice Guidance (PPG)

- 6.7. In March 2014 the Government published the PPG to provide more detailed guidance for planners and communities. The PPG has been updated on various occasions since its inception, the most recent update being in September 2023. The PPG should be read alongside the NPPF.

London Plan (March 2021)

6.8. The London Plan, published March 2021, sets out the overall strategic plan for London over the next 20-25 years. The London Plan is based upon three principle purposes for the Greater London area:

- Promoting economic development and wealth creation;
- Promoting social development; and
- Promoting the improvement of the environment.

The Hillingdon Local Plan

6.9. The HLP sets out the planning strategy and policies for the borough through to 2026. It sets out the strategic visions and policies for areas across the borough, as well as development management policies, implementation policies and site allocations.

Site Designations

6.10. As set out in HLP2, the Site is subject to allocation under 'Policy SA26: 148-154 High Street / 25-30 Bakers Road, Uxbridge', designating it suitable for residential-led mixed use redevelopment subject to the following criteria:

- Provision of upper floor residential units, which must include affordable housing and an appropriate mix of units, provided in accordance with Council standards. Other main town centre uses, such as leisure uses, may be acceptable on upper floors;
- Retention of ground floor retail uses fronting onto the High Street and provision of main town centre uses, providing active frontages onto Bakers Road and Belmont Road;
- The redevelopment should enhance the pedestrian thoroughfare of Cock's Yard linking Uxbridge Town Centre and the Bus Interchange;
- Amenity space and car parking should be provided in accordance with the Council's standards;
- The redevelopment should sustain and enhance the significance of the adjacent Conservation Area and its setting;

- The Council will expect redevelopment proposals to reflect the scale and character of the surrounding townscape and have regard to the setting of the Old Uxbridge and Windsor Street Conservation Area and Listed Buildings. Whilst the London Plan density guidance indicates a development potential of up to 120 units, New Homes 77 capacity on this site should be led by high quality design, taking account of the site's prominent location; and
- Proposals should provide scope to incorporate the redevelopment of the land to the south of the site (identified in yellow on the site plan), extending from Cock's Yard to the Uxbridge Underground Station, in accordance with the principles set out in this policy.

6.11. As set out in the Adopted Policies Map (2020), London Plan and adopted guidance, the Site is also subject to the following designations:

- Uxbridge Town Centre
- Hotel and Office Growth Location
- Primary Shopping Area
- Archaeological Priority Area
- AQMA

7. Planning Considerations

7.1. This section assesses the proposals against the planning policy framework for the Site. The areas of focus will be as follows:

- Principle of Development (Commercial, Hotel and Co-Living);
- Design Approach (Layout, Height and Massing);
- Heritage Impact;
- Residential Quality;
- Neighbouring Amenity;
- Open Space and Landscaping;
- Urban Greening;
- Transport, Parking and Servicing;
- Ecology and Biodiversity;
- Energy and Sustainability;
- Flood Risk, Drainage and Water Cycle Strategy;
- Wind Mitigation Strategy;
- Air Quality;
- Contamination; and
- Fire.

Principle of Development

7.2. HLP1 Policy E4 (Uxbridge) sets out that the Council will strengthen the status of Uxbridge Town Centre as a Metropolitan Centre by delivering growth and promoting Uxbridge as a suitable location for retail, offices, hotels, recreation and leisure, and mixed-use development. Similarly, HLP Policy SA26: 148-154 High Street / 25-30 Bakers Road, Uxbridge allocates the site for a residential-led mixed use redevelopment subject to various in-principle criteria, including the provision of upper floor residential units; the provision of main town centre uses; the retention of ground floor retail uses and the enhancement of the pedestrian throughfare of Cock's yard linking Uxbridge Town Centre and the Bus Interchange.

7.3. The Proposed Development comprises the comprehensive development of the existing site to provide a mixed-use development, comprising Co-Living (Class Sui Generis), Hotel (Class C1) and replacement

commercial (Class E) floorspace. In accordance with the site allocation, the Proposed Development includes the re-provision of commercial floorspace along Uxbridge High Street and Belmont Road and delivers ground floor active frontages across the site. It also incorporates the delivery of a permeable and accessible central public courtyard that enhances the pedestrian thoroughfare of Cock's Yard and delivers the connections between Uxbridge High Street and the Uxbridge Interchange anticipated within the site allocation. The Proposed Development is focused on the delivery of main town centre uses, including commercial and hotel and seeks to also consolidate a Sui Generis residential use in accordance with Site Allocation SA26.

- 7.4. The Proposed Development is considered to be largely in accordance with HLP Policy SA26 and is therefore acceptable. Each of the individual uses will now be considered in detail in turn.

Principle of Replacement Commercial Floorspace

- 7.5. HLP1 Policy E4 (Uxbridge) notes that the Council will strengthen the status of Uxbridge Town Centre as a Metropolitan Centre by promoting Uxbridge as a suitable location for retail, offices, hotels, recreation and leisure, entertainment and culture, evening and night-time economy, education, community services, and mixed-use development. HLP1 Policy E5 (Towns and Local Centres) sets out that additional retail growth will be accommodated in established centres, and HLP1 Policy E2 (Location of Employment Growth) sets out that the Council will accommodate 9,000 new jobs during the plan period.
- 7.6. Policy DMTC 1 (Town Centre Developments) sets out that the Council will support main town centre uses where the development proposal is consistent with the scale and function of the centre. It states that the residential use of ground floor premises in primary shopping areas will not be supported.
- 7.7. The Site falls within Uxbridge Town Centre and is therefore considered acceptable for Main Town Centre Uses, including retail, in accordance with HLP1 Policy E4 and E5.
- 7.8. The Site is also situated within the Primary Shopping Area. HLP2 DMTC 2 (Primary and Secondary Shopping Areas) sets out that the Council will support the ground floor use of premises for retail, financial and professional activities and restaurants, cafes, pubs and bars provided that (inter alia): a minimum of 70% of the frontage is retained in Use Class A1 use; the proposed use will not result in a separation of more than 12 metres between A1 retail uses and the proposed use does not result in a concentration of non-retail uses which could be considered to cause harm to the vitality and viability of the town centre.

- 7.9. The ground floor frontage along Uxbridge High Street and Belmont Road is proposed to comprise predominantly of retail uses, save for a small access lobby into the hotel. The introduction of the hotel access on the ground floor will not compromise the delivery of high-quality commercial floorspace along Uxbridge High Street, such that 1,115m sqm of commercial floorspace is re-provided following the demolition of the existing site. In total, 48% of the total frontage of the site will be allocated for commercial uses, and this includes the majority of the frontage along Uxbridge High Street which is the focus of the retail activity and a large proportion of the frontage along Belmont Road.
- 7.10. In addition, co-living amenity space is proposed along the Bakers Road ground floor frontage, which will also deliver greater activation of the frontage than the existing provision. Whilst the co-living floorspace is not listed as a use that will be supported in the primary shopping area under Policy HLP2 DMTC 2, the site allocation requires a residential-led mixed-use approach to development that delivers active frontages across the site, which the delivery of the co-living amenity is in accordance with. Furthermore, the existing character of Bakers Road is poor quality and less retail-focused, with the entrances to the Premier Inn hotel and Senator Court's office accommodation situated also along the frontage. The introduction of the co-living amenity at this location, along with the new and improved Cocks Yard access into the public park, would therefore enhance the appearance of Bakers Road and improve connectivity with the retail facilities along Uxbridge High Street and within the pocket park. It is well-recognised that the introduction of residential uses will support the functioning of town centres by increasing footfall and therefore we consider that the co-living use would support the vitality of Uxbridge town centre in accordance with NPPF Chapter 7.
- 7.11. In summary, the Proposed Development will deliver a significant proportion of commercial frontage along the key areas for retail provision, including Uxbridge High Street and Belmont Road. The commercial floorspace has been maximised through the introduction of a mezzanine level and incorporates double-heighted frontages to create an attractive and active commercial environment. It is considered that the quantum of commercial floorspace proposed is appropriate to the local context noting that there are a significant number vacant retail units along both Uxbridge High Street and within the Pavilion Shopping Centre. LBH's Summary Evaluation of the Retail Revival Evaluation Report prepared for the Residents' Services Select Committee in June 2023 also identified that Uxbridge Town Centre saw an increase in vacant units between 2021 and 2022. It is therefore considered that the delivery of a residential-led mixed-use scheme, which incorporates both commercial Class E floorspace and a hotel, which is defined as a main town centre use, offers employment opportunities and encourages increased footfall within Uxbridge

Town Centre. The delivery of this scheme could therefore assist with combatting issues of vacancy and contribute to the vitality of Uxbridge Town Centre in accordance with the ambitions of HLP1 Policy E4 (Uxbridge) and the aspirations of site allocation SA26.

Principle of Hotel Development

- 7.12. HLP1 Policy E4 outlines the Council's intention to strengthen the status of Uxbridge Town Centre as a Metropolitan Centre through the promotion of a pro-growth strategy and its prioritisation as a suitable location specifically for retail, offices, hotels and alternative recreational activities.
- 7.13. HLP1 Policy E2 outlines that the Council will accommodate a minimum of 3,800 additional hotel bedrooms by 2026, and encourage new hotel and visitor facilities within Uxbridge. This is reinforced by LP Policy SD6 and LP Policy E10 which sets out that tourist infrastructure and hotels in Town Centre locations should be promoted, especially where they are well-connected to public transport.
- 7.14. The Site is situated within Uxbridge Town Centre, only 50-metres away from Uxbridge Underground Station and benefits from an excellent PTAL rating of 6a. The provision of hotel floorspace within this location is therefore in full accordance with both local and regional policy.
- 7.15. The provision of hotel accommodation is also supported by site allocation 'SA 26: 148-154 High Street / 25-30 Bakers Road, Uxbridge', which encourages the provision of main town centre uses on the site. In accordance with the NPPF (2023), the definition of main town centre uses includes hotels and therefore the provision of hotel floorspace on the site is acceptable.
- 7.16. There is significant demand for hotel floorspace in this location, as identified in the GLA's Working Paper 88 and Hillingdon's Tourism Study. The GLA's Working Paper 88 posits Hillingdon as one of 4 identified Boroughs which it expects a significant portion of the intended increase in serviced accommodation to be delivered within. The GLA anticipates this delivery to be circa 5,000 rooms by 2041. Hillingdon's Tourism Study identifies Uxbridge as a strategic location for the delivery of additional hotel rooms.
- 7.17. It is considered that the significant increase in visitor accommodation provided by the Proposed Development, will help consolidate the status of Uxbridge as Metropolitan Centre in accordance with HLP1 Policy E4. The principle of new hotel rooms on this Site is therefore considered acceptable in line with local and regional policy and this has been confirmed by Officers in the pre-application feedback to date.

Principle of Co-Living development

- 7.18. Co-Living accommodation is a non-conventional housing product and falls within a Sui Generis Use Class. From a review of previous applications for Co-Living within LB Hillingdon, it is understood that HLP2 Policy DMH 5 (Housing in Multiple Occupation) applies.
- 7.19. HLP2 Policy DMH 5 (Housing in Multiple Occupation) states that in all parts of the Borough Proposals for the provision of large HMOs, residential hostels, student accommodation and secure accommodation will be required to demonstrate that:
- there is good accessibility to local amenities and public transport;
 - they accord with the Accessible Homes standards and provide satisfactory living conditions for the intended occupiers; and
 - there will be no adverse impact on the amenity of neighbouring properties or the character of the area.
- 7.20. The Site is located in Uxbridge Town Centre, close to various local amenities, and benefits from an excellent PTAL rating of 6a. It is therefore considered to be very suitable for Co-Living development in accordance with HLP2 Policy DMH5.
- 7.21. LP Policy H16 establishes the criteria for purpose-built shared living developments across London with particular note to:
- Quality of design;
 - Accessibility of location;
 - Need for single management;
 - Implementation of minimum tenancy lengths of 3 months;
 - Communal facilities and services;
 - Incapability of use as self-contained homes; and
 - A cash in lieu contribution towards conventional C3 affordable housing.
- 7.22. The Proposed Development will provide 320 no. Co-Living units (Sui Generis) within Uxbridge town centre. It is considered that the development will greatly strengthen the housing stock for single-person households who cannot or choose not to live in self-contained homes or HMOs, and the relevant criteria set out in Policy H16 will be complied with. The Co-Living accommodation will be under single

management; rented with a minimum tenancy of no less than three months; and will provide communal facilities and services, adequate functional living space; and provide a management plan. This will help to ensure the continued success and high quality living environment for residents. Such management systems are often not in place for smaller shared living accommodation.

- 7.23. The delivery of Co-Living accommodation contributes to LB Hillingdon's Housing Targets by providing an alternative housing product. LP Paragraph 4.1.9 identifies that that non self-contained communal accommodation would count towards meeting housing targets based on a 1.8:1 ration of rooms to homes. On this basis, the proposed scheme would equate to 178 units of conventional housing. This is a positive benefit of the development, significantly contributing to both the strategic aims of HLP1 and also the London Plan's annualised housing target of 425 new dwellings per year up until 2026.
- 7.24. The proposed development is therefore strongly designed to be occupied on a communal basis due to the extent and nature of communal facilities and services to be provided. It is therefore considered in accordance with Part (7) of LP Policy H16.

Design Approach

- 7.25. In advocating the role of planning and development in the creation of high quality, beautiful and sustainable buildings as well as places, paragraph 126 of the NPPF is clear that *"good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*
- 7.26. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
- 7.27. LP Policy D3 encourages the optimisation of sites, having regard to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity, including transport. LP Policy D3 also states that the design-led optimisation of sites should consider details of form and layout, experience, and quality and character.
- 7.28. The extent of development proposed is characteristic of a sustainable town centre location, seeking to

deliver 320 no. Co-Living Units, 162 no. Hotel bedrooms alongside 1,115 sqm of commercial floorspace.

- 7.29. HLP 2 Policy DHMB 11 (Design of New Development) sets out that all development will be required to be designed to the highest standards and incorporate principles of good design. It details a list of design criteria that development will be expected to accord with.

Height and Massing

- 7.30. Policy D9 of the London Plan (2021) states that Development Plans should define what is considered to be a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18m measured from ground to the floor level of the uppermost storey. HLP 2 Policy DMHB 10 defines tall/high buildings and structures as those that are substantially taller than their surroundings, causing a significant change to the skyline. LBH's Townscape Character Assessment confirms that Uxbridge and Hayes are the most suitable locations for high buildings in the Borough.
- 7.31. It is clear from the definition stated above that not all schemes which involve the development of 6 stories, 18m or more are considered to constitute a tall building. It is dependent on the context of the proposed development and LBH's Townscape and Character Assessment confirms that Uxbridge is a suitable location for high buildings (as per para 5.32 of LBH's Local Plan Part 2 – Development Management Policies).
- 7.32. The design of the Proposed Development has followed a design-led approach and has been designed to fully integrate with the surrounding local context and optimise the site capacity given its position in Uxbridge Town Centre. The design has been refined in response to comments from LB Hillingdon's Planning and Design Officers during multiple pre-application consultations and discussions with both the GLA and London Design Review Panel, who have indicated that the proposed massing could be considered acceptable.
- 7.33. The Proposed Development reaches its highest point of 10-storeys along Bakers Road and steps down to 9-storeys at the corner with the existing Cock's Yard. This responds to the surrounding streetscape where numerous tall developments extend down this street, including both the 9-storey Premier Inn and Senator Court located directly opposite. The proposed massing along the north side of the development fronting Belmont Road steps down to 8 storeys in height to reduce the perceived bulk and massing of the site against the lower density buildings to the north.

- 7.34. Along Uxbridge High Street, the hotel on the development's western façade reaches 9 storeys, with the top 2-storeys incorporating a mansard appearance. The design helps to reduce the perceived bulk and massing of the Proposed Development from Uxbridge High Street and also ensure that it integrates well with the adjacent 8-storey residential tower blocks, Armstrong House and Middlesex House, which sit atop of the Pavilions shopping centre, known as 'the Pavilions'.
- 7.35. As discussed, the Site is situated within Uxbridge Town Centre and is therefore considered appropriate for higher density development as per the Council's Townscape Character Assessment. Furthermore, it is surrounded by numerous buildings of a similar height, including Armstrong House and Middlesex House, which sit atop of the Pavilions shopping centre, and also the adjacent Premier Inn, which also sits at 9-storeys and other office buildings along Bakers Road which sit between 5-storeys and 9-storeys. The immediate surrounding context to the east and west is therefore higher-density and the proposed height and massing seeks to respond to this local context.
- 7.36. Responding to Officer feedback throughout numerous pre-application meetings, the facades of the Proposed Development have been carefully considered in their design to prevent any perception of repetition. This is achieved through variation to the materiality which helps to delineate between different levels and. Additionally, a double height colonnade wraps itself around the ground floor frontage on each roadside elevation, helping to add depth and variation to the scale and massing of the Proposed Development as well as enhancing the user experience of pedestrians around this corner plot.
- 7.37. For the reasons set out above, it is considered that the scale and massing responds suitably to the surrounding streetscape and would not sit substantially taller than its surroundings. It is therefore not considered contrary to HLP 2 Policy DMHB 10 or LP Policy D9. Instead it is considered to optimise the capacity of the Site through a design-led approach in accordance with LP Policy D3.

Heritage

- 7.38. Chapter 16 of the NPPF stipulates the importance of protecting heritage assets so they can be enjoyed for their contribution to the quality of life of existing and future generations. Paragraph 205 stipulates that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the great the weight should be). Paragraph 208 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against

the public benefits of the proposal including, where appropriate, securing its optimum viable use.

7.39. HLP 1 Policy HE1 (Heritage) sets out that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.

7.40. HLP 2 DMHB 4 (Conservation Areas) states that new development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:

A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.

B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.

7.41. It is noted that the Site is situated on the fringe of both the Old Uxbridge and Windsor Street Conservation Area and in proximity to a number of listed buildings.

7.42. A full Heritage Statement has been prepared by Orion Heritage to assess the heritage impact of the Proposed Development on the designated heritage assets and this section should be read in accordance with the Heritage Statement.

7.43. The Statement concludes that the impact of the development on the significance of the assets in their setting was at either the lowest or lower end of the scale of less than substantial harm. It confirms that despite the significance of the assets, the impact of the development is restricted to oblique views of part elevations and upper levels. Both the distance and mitigation measures employed in the design of the building result in a low level of less than substantial harm to those assets on the High Street and negligible harm to those on Windsor Street.

7.44. It confirms that several less condensed assets further south along the High Street, as a result of the distance and curvature of the High Street were considered not to be impacted by development in their setting.

7.45. Owing to the proximity to two Conservation Area the submitted Heritage Assessment concludes that there exists a diverse townscape surrounding the site which has the potential to facilitate the inclusion of carefully considered and crafted modern buildings into this area. The development is considered to exemplify the local context.

7.46. The Heritage Report ultimately concludes that the public benefits proposed outweigh the low level of less than substantial harm in accordance with NPPF Paragraph 2018. Such benefits chiefly include:

- The delivery of 320 high quality co-living units in a highly sustainable and extremely well-connected Town Centre location and on a strategic site specifically allocated for residential-led mixed-use development;
- The delivery of 162 hotel rooms in a well-connected town centre location to significantly contribute to the tourist offer within Uxbridge in an area identified for hotel growth;
- The re-provision of high-quality commercial floorspace and improved active frontages that will contribute to the vitality of Uxbridge Town Centre;
- The delivery of new and enhanced public realm including a publicly accessible pocket park and associated soft landscaping;
- Significant economic benefits, including construction jobs, additional operational phase jobs, increased residential expenditure, additional Business Rates income, additional Council Tax, New Homes Bonus and CIL / Section 106 Contributions;
- Measurable Biodiversity Net Gain and associated urban greening.

7.47. On this basis, the proposal is considered acceptable in heritage terms and in accordance with local and national planning policy.

Residential Quality

7.48. In promoting the role of the planning and development process in creating high quality places, NPPF paragraph 130 is clear that planning policies and decisions should ensure that developments “*will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development*” and are developments “*...which promote health and well-being, with a high standard of*

amenity for existing and future users...”.

- 7.49. In terms of the co-living provision, LP Policy H16 details a list of design criteria that large-scale purpose-built shared living accommodation should accord with to ensure residential quality. This includes providing communal facilities and services that are sufficient to meet the requirements of the intended number of residents and offer at least: a) convenient access to a communal kitchen; b) outside communal amenity space (roof terrace and/or garden); c) internal communal amenity spaces (dining rooms, lounges); d) laundry and drying facilities; e) a concierge; and f) bedding and linen changing and /or room cleaning services. LP Policy H16 also requires the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes.
- 7.50. The GLA have also published their guidance on large-scale purpose-built shared living accommodation which was adopted in February 2024. This document sets out detailed standards for communal spaces and private rooms, which are outlined in the Table below.

Category	London Plan Standards
Standard Private Units Size	18 - 27sqm
Accessible Private Units Size	28 - 37sqm
Internal Communal Amenity Size	Min. 5sqm of ‘essential’ internal communal facilities per resident Aim to distribute on every floor
External Communal Amenity Size	Min. 1sqm per resident At least 40 sqm for each space
Kitchen	At least 5 cooking stations per kitchen Min. 0.6sqm per resident
Dining	Min. 0.5sqm per resident
Laundry	1 washer and dryer per 10 residents

- 7.51. In terms of the co-living provision, LP Policy H16 details a list of design criteria that large-scale purpose-built shared living accommodation should accord with to ensure residential quality. This includes providing communal facilities and services that are sufficient to meet the requirements of the intended number of residents and offer at least: a) convenient access to a communal kitchen; b) outside communal amenity space (roof terrace and/or garden); c) internal communal amenity spaces (dining rooms, lounges); d)

laundry and drying facilities; e) a concierge; and f) bedding and linen changing and /or room cleaning services. LP Policy H16 also requires the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes.

- 7.52. The detailed design of the proposed Co-Living Accommodation evolved in accordance with LP Policy H16. The Proposed Development will incorporate: a) convenient access to a communal kitchen with well-lit living spaces and kitchen / diners provided on each floor; b) external communal amenity space at the 8th floor; c) internal communal amenity space in the form of co-working space, a gym and a games room on the lower ground floor; d) laundry and drying facilities and e) a concierge. It is the intention to deliver the accommodation in accordance with the relevant guidance, where possible, and an Internal Daylight Assessment has been undertaken which confirms that the proposed communal spaces in the lower-ground floor will be adequately lit through the incorporation of a lightwell.
- 7.53. As is detailed further in the Design and Access Statement, the proposed co-living accommodation has been designed in accordance with the London Plan Guidance on large-scale purpose-built shared living accommodation which was adopted in February 2024.

Accessibility

- 7.54. HLP2 DME 5 (Hotels and Visitor Accommodation) states that the Council will support a range of visitor accommodation, subject to a high standard of building and site design, including landscaping and placement of signage that makes a positive contribution to local amenity and the streetscape; and the provision of an accessible layout and rooms in accordance with Policy DME 6: Accessible Hotels and Visitor Accommodation.
- 7.55. HLP2 DME 6 (Accessible Hotels and Visitor Accommodation) states that the Council will require: all proposals to meet the requirement of the Accessible Hillingdon SPD; and a 10% provision of hotel rooms to meet wheelchair accessibility standards for proposals of 10 rooms or more.
- 7.56. London Plan Policy E10 (Visitor Infrastructure) also states that development proposals for serviced accommodation should provide either: 10 per cent of new bedrooms to be wheelchair-accessible; or 15

per cent of new bedrooms to be accessible rooms.

- 7.57. The proposed hotel will provide a total of 9 no. accessible rooms and 8 no. ambulant standard rooms, which equates to 11% provision. In addition, the proposed development includes 7 no. adaptable family rooms, which could be converted in the future, increasing the provision to 15%. This is considered to be in accordance with the London Plan Policy E10.
- 7.58. In addition, the co-living scheme will provide 32 no. accessible units, equating to 10% provision.

Neighbouring Amenity

- 7.59. Paragraph 130 of the NPPF states that decisions should ensure high standards of amenity for existing and future users.
- 7.60. HLP2 Policy DMHB 11 states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 7.61. HLP2 DME 5 states that the Council will support a range of visitor accommodation, subject to no adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion.
- 7.62. The density and layout of the scheme seeks to optimise the use of the land and has been designed with input from LBH Officers during the pre-application engagement to date. The site is in a town centre location and therefore the primary surrounding uses comprise commercial uses, including retail, restaurant and hotel. There is also a medical centre along Baker Street and residential uses above the Pavilions shopping centre.
- 7.63. The residential uses above the Pavilion Centre are the most sensitive to the Proposed Development, however the impact on privacy is limited due to the temporary and transitory nature of the proposed hotel use which overlooks these residential units. The hotel bedrooms will only be occupied temporarily for a short period of time and therefore the impact on privacy is significantly reduced.
- 7.64. The potential impact of the Proposed Development on neighbouring amenity has been assessed in detail through the production of the Daylight and Sunlight Assessment and Noise Impact Assessment to support the full planning application. The findings of these assessments are set out below and demonstrate that

there will be no detrimental impact on residential amenity.

Noise

- 7.65. A Noise Impact Assessment Report has been prepared by Spectrum Acoustic Consultants to support this application. The report assessed the acoustic levels associated with the proposed development to ensure that acceptable standards of amenity will be provided for residents of the scheme, including ambient noise levels within dwellings during the day and night times, in addition to outdoor amenity areas.
- 7.66. Assessing the design detail at present, the noise transmission from the occupied non-residential uses and mechanical plant were considered acceptable. Suitably worded planning conditions are considered to ensure that no significant noise impact will arise for the nearest affected dwellings from these noise sources.
- 7.67. The Noise Impact Assessment also concluded that providing the façade and sound insulation measures put forward are implemented, the Proposed Development will be in accordance with the requirements of the Local Planning Authority and additional relevant standards and guidance.
- 7.68. The Proposed Development is there considered acceptable in terms of noise and has been designed to effectively manage and mitigate any potential impacts in accordance with HLP2 Policy DMHB 11 and DME 5.

Daylight and Sunlight

- 7.69. A Daylight and Sunlight Assessment, produced by Point 2, has been submitted to support this application and demonstrate the daylight and sunlight impact of the Proposed Development. The assessment uses Vertical Sky Component (VSC), No Sky Line (NSL) and Annual Probable Sunlight Hours (APSH) testing to assess the daylight and sunlight to existing neighbouring buildings, in line with the latest BRE guidance. The Assessment has considered the impact on a range of local properties including: 141 High Street, 9 Belmont Road, 11 Belmont Road, 1-3 Bakers Road, Premier Inn, Middlesex House, Armstrong House. Non-habitable rooms, as identified on the relevant floor plans were discounted from the analysis.
- 7.70. The report concludes that 244 / 311 (78%) of windows will adhere to BRE Guidelines. The majority of the BRE transgressions are isolated to 1-3 Bakers Road by virtue of the deep window/room design arrangement of the building. This design configuration is considered to render many windows with low

existing light levels and therefore any slight outlook alteration is likely to translate to a disproportionate percentage change in light. In addition, the majority of the transgressions within 1-3 Bakers Road are bedrooms, a classification as recognised by BRE Guidelines, to carry less expectation for natural light when compared to a living room.

- 7.71. In terms of the remaining VSC transgressions, the report concludes that the majority of windows record good retained VSC levels, considered acceptable for an urban location.
- 7.72. In terms of NSL, 181 / 208 (87%) of the rooms will adhere to BRE Guidelines. 20% of these transgressions are again situated within 1-3 Bakers Road and can be attributed to the same reasons as set out above. Importantly, it's noted that the majority of the material changes occur to bedrooms. Where there are changes to living-kitchen-diners, the assessment shows these changes are marginal and fall within 10% beyond the BRE's permissible 20% change from former value.
- 7.73. The results of the sunlight (APSH) test, show that 125 / 142 (88%) will meet BRE Guidelines. Again, the majority of the transgressions are related to 1-3 Bakers Road. 6 out of 14 affected rooms within 1-3 Bakers Road are bedrooms and a further 8 rooms record APSH greater than 15%. This level of retained APSHS is considered good for an urban area, particularly when sunlight challenges can often be unavoidable as it is dependent on the orientation of the room outlook.
- 7.74. The Sun Hours on Ground assessment recorded full compliance (100%) with BRE Guidelines in respect of the surrounding shopping centre amenity space.
- 7.75. In summary, the report concludes that the Proposed Development will relate well with the neighbouring context and will fall within the practical application of the BRE Guidelines. The Proposed Development should therefore be considered in accordance with HLP2 Policy DMHB 11 and DME 5.

Open Space and Landscaping

- 7.76. LP Policy D8 relates to public realm and highlights the role of this in creating an environment that is easy to understand, facilitates movement, incorporates green infrastructure, and is supportive of the built form in contributing to the sense of place. As part of this, LP Policy G1 is clear that *“green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits”*. There is an expectation that development proposals where possible should create areas of publicly accessible open space, particularly in areas of deficiency, as a vital component of London's Infrastructure (LP Policy G4).

- 7.77. At a local level, HLP2 Policy DMHB12 relates specifically to streets and public realm, expecting new development to be well integrated with the surrounding area and accessible. The design of public realm should take “...account of the established townscape character and quality of the surrounding area” and “include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space”. Where developments are located close to transport interchanges and community facilities, it outlines that public realm improvements will be sought to ensure easy access.
- 7.78. HLP1 Policy DMCI 4 (Open Spaces in New Development) states that proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space.
- 7.79. As part of the Proposed Development, the existing servicing yard and Cocks Yard will be opened up to the public create a new and improved pocket park. Approx. 2,070 sqm of the site will be used as open public space, which is a significant public benefit of the scheme and is in full accordance of HLP1 Policy DMCI 4. This courtyard has been designed to improve the accessibility between Uxbridge High Street and Uxbridge Tube station and bus interchange, through the introduction of three new pedestrian accesses, which is also in accordance with the criteria set out in the site allocation (Policy SA26). It will also improve accessibility and ease of movement through the town centre in accordance with HLP 2 Policy DMHB12.
- 7.80. The Landscape Strategy prepared by Oobe also demonstrates how the courtyard will incorporate extensive landscaping and public realm improvements to create an attractive and well-designed public square and contribute to the urban greening of Uxbridge.

Urban Greening

- 7.81. LP Policy G5 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. The Mayor sets out that development proposals should seek to achieve target urban greening factor (UGF) score of 0.4 for developments that are predominantly residential, and a target score of 0.3 for predominately commercial development.

- 7.82. The UGF strategy prepared by Oobe notes that the proposed landscaping will deliver a UGF target of 0.158 which is below the target set by the LP Policy G5. However, it is important to remember that this is specifically a “target”.
- 7.83. Opportunities for urban greening have been fully explored and the green infrastructure provided on Site has been maximised as far as possible in accordance with LP Policy G5. The opportunities for urban greening within the proposed pocket park have been maximised without constraining access and circulation across the site. Furthermore, the space available at roof level is extremely constrained due to the M&E requirements and inclusion of PV panels to service the building and reduce carbon intensity.
- 7.84. It is therefore considered that green infrastructure provision on-site has been maximised as far as possible and the delivery of the pocket park will be of significant benefit to Uxbridge town centre.

Transport, Parking and Servicing

- 7.85. This section should be read in accordance with the Transport Assessment, prepared by Caneparo Associates.
- 7.86. NPPF Paragraph 115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 7.87. HLP 2 Policy DMT 1 (Managing Transport Impacts) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. HLP 2 Policy DMT 2 states that proposals must ensure that safe and efficient vehicular access to the highway network is provided and ensure that schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents.
- 7.88. A Transport Assessment, Residential Travel Plan and Hotel Travel Plan has been prepared by Caneparo Associates to support this application. The Transport Assessment provides an assessment of the transport and parking impacts of the proposed development to demonstrate that the Proposed Development will not have any adverse effect on the local highway network in accordance with HLP 2 Policy DMT 1.

Car Parking

- 7.89. LP Policy T6 states that car parking should be restricted in line with levels of existing and future public

transport accessibility and connectivity. It is expected that car-free development is the starting point for all development proposals in places that are well-connected by public transport. Noting that the Site benefits from a PTAL score of 6a and is highly accessible to key transport modes, the Proposed Development will be car-free, save for 9 disabled car parking spaces

- 7.90. HLP 2 Policy DMT 6 (Vehicle Parking) sets out that development proposals must comply with the parking standards set out in the local plan in order to facilitate sustainable development and address issues relating to congestion and amenity. It states that the Council may agree to vary these requirements when the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity, and / or a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.
- 7.91. As set out above, Caneparo Associates have prepared a Transport Assessment which details the level of disabled parking proposed for the site. In accordance with the relevant parking standards, 4 on-site accessible parking spaces are proposed to serve the co-living units and 5 on-site accessible parking spaces are proposed to serve the hotel. Collectively, these 9 accessible parking spaces will be located off-street in the site's basement level which can be accessed by the proposed vehicular ramp off of Bakers Road.
- 7.92. LP Policy T6.4 (Hotel and Leisure Uses Parking) states that all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles. In accordance with this policy, all 5 of the disabled parking spaces for the hotel will have either active or passive EV infrastructure.

Cycle Parking

- 7.93. LP Policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle.
- 7.94. The Transport Assessment ('TA') confirms that the cycle parking provision will be delivered in accordance with the London Plan standards for long-stay and short-stay parking. The TA sets out the following:
- The long-stay cycle parking for the co-living units will be provided in accordance with the Large Scale Purpose-built Shared Living ('LSPBSL') London Plan Guidance ('LPG'), providing 0.75 spaces per room, equating to 240 cycle parking spaces. In total, 240 spaces are proposed in accordance with the London Plan requirement.

- The long-stay cycle parking for the hotel will be provided within a dedicated cycle store at basement level, providing 9 spaces in accordance with the minimum standards set out within the London Plan. Policy T5 of the London Plan prescribes a long-stay cycle parking provision of 1 space per 20 rooms, equating to the provision of 8.1 spaces, and, as such, 9 spaces are compliant.
- Owing to the flexible potential use of the flexible Class E commercial element of the proposals, it is not typically possible to determine the anticipated levels of cycle storage required. However, the Applicant has demonstrated how a single store can be provided at basement with space for 14 cycles which would accommodate the realistic occupancy of the space by traditional retail units. It notes that this provision significantly exceeds the requisite policy requirements.

7.95. The TA also sets out that the design of the respective cycle stores provides a mixture of spaces to meet the varying needs of cyclists and will comprise 5% accessible spaces (double width Sheffield stands); 20% Sheffield stands, and 75% two-tier stands. The cycle store will benefit from aisle widths measuring at least 2.5m.

7.96. In terms of access to cycle parking, the TA confirms that they will be accessible via the proposed vehicular ramp or via a dedicated cycle lift accessed from the internal courtyard. The vehicular ramp will have a gradient of 1:10, and whilst it will be suitable for most cyclists, it would not provide step-free access for accessibility requirements. The proposed cycle lift will be designed to align with LCDS standards (measuring at least 1.2m x 2.3m in size) and provides step-free access for all cyclists into the cycle store. Further information on the access is provided in the TA.

7.97. In terms of the short-stay cycle parking strategy, the TA confirms that a total of 24 cycle parking spaces in the form of 12 Sheffield stands are proposed. This is considered acceptable as it seeks to maximise the quantum of cycle parking available without compromising the benefits of the proposed public realm and space available for pedestrians. Further justification the strategy is provided in the TA.

Delivery and Servicing

7.98. A full Delivery and Servicing Plan, prepared by Caneparo Associates, has been provided and submitted alongside this application.

7.99. Existing servicing activity is undertaken within the existing courtyard or using legal loading opportunities on-street, including the loading bay on Bakers Road adjacent to the site. The proposed deliveries, servicing

and waste collection strategy has been developed to reflect the numerous pre-application discussions undertaken with LBH.

- 7.100. The Delivery and Servicing Plan confirms it is the intention for all servicing activity to occur on-street using the proposed loading bay on Belmont Road, or the potential double-yellow line restrictions available on Bakers Road.
- 7.101. Waste stores associated with the development have been located to be as close as possible to the site frontage to reduce drag distances (to 10-metres) from the collection points and simultaneously maximise active site frontage. The refuse of the Co-Living accommodation will be managed through a private operator.
- 7.102. A loading bay will be delivered on Belmont Road to serve the respective uses and reduce drag distances for bins. This will allow for 4 accessible parking spaces and a 20m length loading bay across the site frontage. Illustrative designs have been prepared to indicate where the 2-accessible parking spaces and motorcycle parking spaces could be relocated to within the closest opportunities to the site.
- 7.103. The current location of the existing loading bay would effectively block the access into the site. Unless amendments to the bus stops could be pursued, it will be necessary to remove the loading bay. Instead, the Applicant proposes to introduce double yellow line parking restrictions which would allow for loading and servicing to occur at this location, including to serve neighbouring uses. However, a vehicle would block the access to the proposed basement parking. As such, numerous access solutions have been developed to work in a holistic manner and a copy of the proposed arrangement is included at Appendix A of the submitted Delivery and Servicing Plan.
- 7.104. A vehicle swept path analysis has been undertaken to demonstrate the suitability of the access and servicing arrangement in the interim and future arrangements. The approach will there continue to ensure safe and efficient delivery and servicing in accordance with LP Policy T7 and HLP2 Policy DMTC 1. A number of measures are proposed within the Delivery and Servicing Plan, which are set out in Section 3 of the document and these initiatives will be managed by a Site Manager and on-site management team to ensure compliance. This principle of which was accepted by Officers during pre-application engagement.

Trip Generation

- 7.105. LP Policy T1 seeks that 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 network and supporting infrastructure are mitigated."

- 7.106. The Delivery and Servicing Plan has assessed the estimated trip generation for the Proposed Development. It is noted that as the proposed scheme is to be car-free, save for the aforementioned 9no. accessible car parking spaces and as such, it is expected that car driver and vehicle movements will be notably reduced.
- 7.107. Assuming each disabled parking bay is used a single time per day, this equates to 9 car arrivals and 9 car departures (18 vehicle movements). It has been calculated that the proposed site will generate in the order of 39 servicing vehicles per day, equating to up to 78 vehicle movements. As such, the proposed development is expected to generate a demand for up to 87 two-way vehicle movements per day. This yields a notable reduction in vehicle trips each day in comparison to the existing site.
- 7.108. The Healthy Streets Transport Assessment further details how the majority of such trips generated by the proposed development will be made using public transport, foot and by cycle, the latter of which is heightened by the significant provision of cycle storage as outlined.
- 7.109. It is envisaged that the proposed development will generate a demand for up to 38 deliveries per day (12-15 for the co-living use; 3-4 for the hotel use; and, 19 deliveries for the retail uses) which it's concluded is unlikely to impact the public transport capacity of Uxbridge. This proposals would therefore not result in adverse impacts to the local highway or public transport networks and would therefore comply with HLP2 Policy DMT 1 and LP Policies T1 and T4.

Construction Traffic

- 7.110. The Application is accompanied by an Outline Construction Logistics Plan ('CLP'), prepared by Caneparo Associates, which seeks to minimise the impacts of construction on the surrounding highway network. A detailed CLP will be produced as detailed design progresses and will be secured through an appropriately worded condition. However, for the purposes of demonstrating the intended approach to ensure there are no adverse impacts as a result of the Proposed Development, the submitted CLP is considered to address requirements of local and regional policy.

Ecology and Biodiversity

- 7.111. Biodiversity Net Gain ('BNG') is now required for applications made on or after 12th February 2024 under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).
- 7.112. Under the statutory framework for BNG, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity net gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits.
- 7.113. As set out in the Government's BNG Guidance, certain types of development are exempt and this includes 'Developments below the threshold'. This relates to developments that do not impact a priority habitat an impact less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats such as hedgerows.
- 7.114. HLP2 Policy DMEI 7 (Biodiversity Protection and Enhancement) states that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. It states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value. It is clear that proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.
- 7.115. LP Policy G6 (Biodiversity and Access to Nature) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 7.116. A Preliminary Ecological Appraisal ('PEA') has also been undertaken by Arbtech to establish the ecological value of the site and the presence/likely absence of notable and/or legally protected species. This report concludes that there is no vegetation on site and there are no habitats of ecological value on the site. It does not identify any significant ecological impacts as a result of the development but recommends that

one bat emergence or re-entry survey is undertaken during the active bat season to confirm the presence or likely absence of a bat roost in the building. It also recommends a low impact lighting strategy designed in accordance with Guidance Note GN08/23 Bats and Artificial Lighting at Night (Institution of Lighting Professionals, 2023); and the undertaking of works where outside of the nesting bird season. It provides a series of recommendations for improving biodiversity on the site, including the redevelopment of the existing servicing site and planting native shrubs and trees and the installation of a peregrine nest box and a swift tower. Subject to implementing the above, the proposed development is not considered to have an adverse impact on biodiversity in accordance with HLP2 Policy DMEI 7 and LP Policy G6.

- 7.117. Despite falling within one of the exemptions for BNG as detailed above, a BNG Assessment has been prepared by Arbtech. The BNG Assessment confirms that the site delivers 0.0 pre-development habitat units, confirming that there is no on-site habitat to be impacted. Notwithstanding this, the BNG Assessment confirms that the Proposed Development will deliver a net gain in habitat units in accordance with HLP2 Policy DMEI 7 and LP Policy G6.

Energy and Sustainability

- 7.118. LP Policy SI2 requires major development proposals to be net zero-carbon, following four principles: 'Be Lean' (use less energy), 'Be Clean' (supply energy efficiently and cleanly, exploiting local resources), 'Be Green' (maximise use of renewable energy) and 'Be Seen' (monitor and report energy performance). Major developments must also create an on-site reduction of at least 35% beyond Building Regulations, with residential development achieving 10% and non-residential development achieving 15% through energy efficiency measures. It states that where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided either through a cash-in-lieu contribution or off-site.
- 7.119. HLP 1 Policy EM1 states that the Council will ensure that climate change mitigation is addressed at every

stage of the development process.

- 7.120. A full Energy Strategy report has prepared by Ridge and submitted alongside the application applying the London Plan's energy hierarchy to reduce greenhouse gas emissions. This report submitted in full demonstrates the energy efficiency measures undertaken to achieve the aforementioned target. Through the application of the three Energy Hierarchy stages, the scheme achieves a total cumulative annual saving of 140.3 tonnes, equivalent to a 59% reduction over the baseline. The shortfall will be met and off-set through a financial contribution. The details of which are set out in the supporting assessment. This therefore aligns with the requirements of LP Policy S12, HLP1 Policy EM1 and HLP2 Policy DME1 2.
- 7.121. The Greater London Authority's Energy Assessment Guidance (2022) states that non-residential development should achieve at least a 15% improvement on Building Regulations from energy efficiency measures alone (the 'Be Lean' stage of the energy hierarchy). The Proposed Development, specifically the Hotel and Co-Living amenity block greatly exceeds this target with a saving of 287% from energy demand reduction.
- 7.122. A BREEAM Pre-Assessment, prepared by Ridge has also been submitted separately alongside the Energy Strategy Report. It demonstrates the current anticipated baseline score is 78.45% for the co-living amenity block and 75.25% for the combined co-living and hotel amenity block. Both scores are equivalent to a BREEAM 'Excellent' rating and therefore in full accordance of HLP1 Policy EM1 and HLP2 Policy DME1 2.

Flood Risk and Drainage

- 7.123. LP Policy SI 13 requires development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy.
- 7.124. HLP 2 Policy DME1 10 (Water Management, Efficiency and Quality) states that applications for all new build developments are required to have a drainage assessment demonstrating that appropriate sustainable drainage systems have been incorporated in accordance with the London Plan Hierarchy. It stipulates that all major new build developments must be designed to reduce surface water run-off rates to no higher than pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change.

- 7.125. As set out in Section 2, the Site is situated within Flood Zone 1, where there is a low risk of flooding. Notwithstanding this, a Flood Risk Assessment and Sustainable Urban Drainage Statement has been prepared by Edge and submitted in full to provide an appropriate assessment of surface run-off and an appropriate drainage strategy in accordance with HLP 2 Policy DMEI 10.
- 7.126. Surface water flows are restricted to 13 litres per second and this volume will be stored within a green/blue roof system. As such, it is considered that the proposed development will not result in an increase in impermeable area or increase in surface water run-off.
- 7.127. Ultimately, the report concludes that the proposed development will not increase the flood risk both on or off site and therefore development of the site is considered sustainable in terms of flood risk various recommendations as detailed in the report in line with National and Local Planning Policy.
- 7.128. On this basis, the proposed mitigation measures embedded within the Proposed Development are considered appropriate and acceptable in flood risk and drainage terms and with regard to SP Policy 68 and LP Policies SI 12 and SI 13.

Wind Microclimate

- 7.129. HLP2 DMHB 10 sets the requirement for high buildings and structures to respond to their local context and satisfy the listed criteria. One such condition stipulates that there should development should “*not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces*”.
- 7.130. To this vein, a Wind Microclimate Assessment has been undertaken by RWDI in support of the proposed development, in which future conditions were assessed using the Lawson Comfort Criteria.
- 7.131. A review undertaken of the baseline meteorological data for the site and the existing building and surrounding context indicates that wind conditions at the existing site are expected to be acceptable for the current uses throughout the year with no safety exceedances.
- 7.132. Wind conditions at ground level are considered to be suitable. Areas identified within this report to be windy are the entrances within the covered passageways to the courtyard (only if these are to be main entrances), any seating placed in areas expected to have standing conditions and if terraces are to be communal

amenity spaces with seating. Mitigation has been suggested for the windier than suitable entrances in the form of landscaping within the courtyard in front of the passageway, or alternatively recessing the entrances by 1.5m.

- 7.133. If seating is situated in any areas expected to be suitable for standing use, mitigation has been posed in the form of screens or planning directly behind the seating. If the aforementioned terraces are to be communal amenity spaces with seating, it has been suggested to implement solid balustrades in combination with landscaping placed within the terraces to provide suitable shelter.
- 7.134. Ultimately, with the inclusion of such mitigation measures, the report finds that the wind conditions around the proposed development would be suitable for the intended uses of the scheme, therefore in full accordance with HLP2 Policy DMHB 10.

Air Quality

- 7.135. LP Policy SI 1, paragraph B(1) sets out requirements for improving air quality in new developments. Paragraph B(2) stipulates that to meet the requirements, all development proposals must aim to improve air quality in the immediate area, and should, as a minimum, be 'Air Quality Neutral' with design solutions incorporated to minimise exposure to existing air pollution. It stipulates that major development proposals must be submitted with an Air Quality Assessment.
- 7.136. HLP1 Policy EM8 and HLP2 Policy DMEI 14 are aligned with the London Plan guidance stating that development must achieve or exceed air quality neutral standards and also address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality through design solutions.
- 7.137. In accordance with paragraph B(2) OF LP Policy SI and HLP2 Policy DMEI 14, an Air Quality Assessment has been prepared by AQA Limited and submitted to support this application and assess the impact of the Proposed Development on the local environment and of the existing local environment upon future users of the Proposed Development.
- 7.138. The impacts of on air quality of at the Proposed Development due to emissions from the local road network have been shown to be acceptable, with concentrations being below the air quality objectives/limit values. The operational air quality impacts on the development are judged to be insignificant, from concluding that no residents of the proposed development will be exposed to exceedances of the objectives/standards.

- 7.139. Ultimately, the report concludes that the Site has been assessed as air quality neutral with respect to building-related and transport-related emissions, in accordance with local and regional requirements.
- 7.140. The impact of the Proposed Development on Air Quality is considered to be acceptable and wholly in accordance with both regional and local planning policy requirements.

Contamination

- 7.141. This section should be read in conjunction with the Contamination Assessment prepared by JPP.
- 7.142. HLP 2 Policy DMEI 12 details the local policy position on land contamination. It states that development will be permitted when it mitigates any contaminated land within the development site.
- 7.143. The Contamination Assessment provides an assessment of various contamination risks at the Site based on conditions encountered by Ground Engineering and laboratory testing, combined with quantitative assessment.
- 7.144. It details that the ground conditions do not present an unacceptable risk of harm, having derived a low risk from each receptor tested against using JPP's conceptual model.
- 7.145. The Assessment also detailed a course of action to be undertaken with regard to the removal of ground for the provision of any soft landscaping. Subject to this recommendation and further consultation with the Council's Land Officer, this assessment concludes that no further action is required.
- 7.146. In accordance with HLP 2 Policy DMEI 12, the Proposed Development is acceptable in planning terms with regard to contamination and the relevant policy requirements.

Fire

- 7.147. LP Policy D12 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"*. It goes on to provide a set of criteria that must be satisfied in order to ensure this and outlines that a Fire Statement must be submitted as part of planning applications for major development proposals to demonstrate compliance and provide details on how the development proposals will function in accordance with a further set of requirements.
- 7.148. In line with the above, from 1 August 2021, the Government introduced further guidance on fire safety and high rise buildings which must be considered as part of the planning process, this is known as "Planning

Gateway One". Where development comprises a "relevant building", as defined by the guidance, a Fire Statement must be submitted as part of any relevant planning application setting out the fire safety considerations specific to the development proposals and the Health and Safety Executive should be established as a statutory consultee on the application. The Proposed Development does comprise a "relevant building" and therefore for the purposes of Planning Gateway One, an according Fire Statement has been prepared by Jensen Hughes and submitted alongside this application.

7.149. In accordance with the LP Policy D12, London Plan Fire Statements for both the Co-Living Building and Hotel Building respectively have been prepared by Jensen Hughes. These have also been submitted as part of the full planning application to ensure the safety of all residents of the Proposed Development. These statements provide numerous recommendations in relation to

- Construction method;
- Products and materials used;
- Evacuation strategies;
- Means of escape for the various uses;
- Active fire safety systems;
- Passive fire safety measures;
- Access and facilities for the fire service; and
- The future development of the asset and 'golden thread' of information

7.150. Each of the 3 submitted Fire Statements confirm that the Proposed Development has been designed to ensure it will satisfy the criteria set out under LP Policies D5, D12 and further guidance and therefore ensure the safety of all future guests and users.

8. Planning Obligations (including Affordable Housing Statement) and CIL

8.1.1. In accordance with Section 106 of the Town and Country Planning Act 1990 (as amended), planning obligations may be used as part of the planning application process to address specific planning issues arising from development proposals. However, paragraph 57 of the NPPF states that planning obligations must only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

8.2. This is in accordance with Regulation 122(2) of the CIL Regulations 2010 (as amended), which puts into law the need for planning obligations to be directly related to development.

8.3. It is anticipated that an appropriate package of Section 106 contributions will continue to be discussed with officers following submission of the planning application.

Planning Obligations

8.4. HLP1 contains a range of policies related to items that will be delivered through CIL and S106 Agreements. These policies include:

- T1 – Accessible Local Destinations;
- T2 – Public Transport Interchanges;
- T3 – North-South Sustainable Transport Links; and
- CI1 – Community infrastructure provision.

8.5. HLP2 Policy DMCI 7 stipulates that Planning Obligations will be sought on a scheme-by-scheme basis to:

- Secure the provision of affordable housing in relation to residential development schemes;
- Where a development has infrastructure needs that are not addressed through CIL; and

- To ensure that the development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

8.6. The tests summarised in paragraph 57 of the NPPF as set out in Regulation 122 of the CIL Regulations (2010 as amended) should inform negotiations on the scale and form of any planning obligations required in association with the Proposed Development. Hillingdon Council's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) provides further detail on the type of planning obligations commonly sought, and it is clear these are derived on a scheme by scheme basis.

8.7. It is expected that the following planning obligations will apply to the Proposed Development:

- Affordable Housing Provision;
- Transportation Contributions (to include measures to support sustainable modes of travel);
- Other Transport Contributions (to include contributions towards TfL's infrastructure);
- Financial Contribution towards Carbon Offset;
- Commitment to an Employment Strategy;
- Biodiversity Net Gain Measures; and
- Site-specific Contributions towards Community Safety

Community Infrastructure Levy ('CIL')

8.8. As per HLP1 Policy CI1, LBH Council will *"ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by ... implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision"*.

8.9. Hillingdon's CIL Charging Schedule came into effect in July 2014 and identifies a rate of £40 per square metre for Hotel development. With no charge listed per square metre for both retail and co-living development, the Mayor of London's CIL rate has been adopted within the CIL calculations. Coming into effect in January 2019, Mayoral CIL2 establishes a rate of £60 per square meter for all other uses.

8.10. In line with the above, the CIL additional information form has been completed and submitted as part of this application. It confirms the CIL chargeable floorspace of the Proposed Development.

8.11. The Council's CIL Regulation 123 List, as detailed most recently within LBH's CIL Annual Report 2018/19 identifies the following strategic infrastructure against which CIL will be spent:

- Education facilities;
- Transport improvements;
- Health care facilities;
- Community care facilities;
- Library services;
- Leisure facilities;
- Open space provision; and
- Community facilities.

9. Conclusions

9.1. This Planning Statement has been prepared on behalf of DNA Uxbridge Limited (“the Applicant”) to support a full planning application seeking permission regarding the demolition of existing buildings to provide a mixed use development at 148-154 High Street, Uxbridge, UB8 1JY (“the Site”).

9.2. The proposed development comprises Hotel (Class C1), Co-Living (Class Sui Generis) and replacement Commercial Floorspace (Class E). The description of development is as follows:

“Demolition of the existing buildings and comprehensive redevelopment of the site to provide a mixed use development comprising hotel (Class C1), co-living (Class Sui Generis) and replacement commercial floorspace (Class E) alongside public realm improvements, including a new pocket park, basement parking and associated infrastructure.”

9.3. In line with paragraph 128 of the NPPF, the granting of planning permission for this application will support development which makes efficient use of land delivering a mixed-use scheme that is in accordance with the aspirations of site allocation SA 26.

9.4. This Town Planning Statement has demonstrated that the Proposed Development would deliver a wide-range of significant public benefits, including:

- The delivery of 320 high quality co-living units in a highly sustainable and extremely well-connected Town Centre location and on a strategic site specifically allocated for residential-led mixed-use development;
- The delivery of 162 hotel rooms in a well-connected town centre location to significantly contribute to the tourist offer within Uxbridge in an area identified for hotel growth;
- The re-provision of high-quality commercial floorspace and improved active frontages that will contribute to the vitality of Uxbridge Town Centre;
- The delivery of new and enhanced public realm including a publicly accessible pocket park and associated soft landscaping;
- Significant economic benefits, including construction jobs, additional operational phase jobs, increased residential expenditure, additional Business Rates income, additional Council Tax,

New Homes Bonus and CIL / Section 106 Contributions;

- Measurable Biodiversity Net Gain and associated urban greening.

