

Job ref: 289/ 25-26 High St

Planning Statement

for

22-26 High Street, Uxbridge UB8 1JN

**Change of Use of upper floors from ancillary office to retail use to
Residential use, creating three two-bed flats, new front
residential entrance, first floor rear entrance and associated
waste and bicycle stores.
Listed Building Consent.**

February 2022

Contents

1.	Introduction.....	3
2.	Recent Planning History	7
3	Proposals and Planning Policy	12
4	Conclusions.....	18
Appendix 1	EA Flood Risk Map	
Appendix 2	Webcat PTAL map	
Appendix 3.	Marketing	

1. Introduction



Photo 1- Frontview of 25-26 High Street, Uxbridge-former Carphone Warehouse shop on ground floor

- 11 This Planning Statement supports a planning submission also seeking Listed Building Consent by Harpans Ltd. to the London Borough of Hillingdon to change the use of the three upper floors from office use to residential. This will create three two-bed flats.
- 12 The whole building has been marketed as a shop with ancillary storage and offices since the closure of Carphone Warehouse in 2020. No suitable offers have been received for the property.
- 13 The proposal is to seek a change of use, converting the upper floors to create three two-bed flats on the first, second and third floors. A new access to the residential units is proposed at the front and rear of the building. The proposals are set out in Table 1.

Table 1 Change of Use Proposals

Floor	No Beds/persons	Proposed size (m2)	London plan min (m2)	Storage	Lon Plan Storage Req
First	2B/3P	66	61	2.3	2
Second	2B/3P	66.5	61	2	2
Third	2B/3P	67.4	61	2.5	2

14 The flats all meet or exceed London plan flat minimum sizes (see Table 1 above). The three flats exceed minimum bedroom sizes (11.5m² for a double bed and 7.5m for a single bed) and minimum bedroom widths. Sufficient storage is provided to meet London plan standards.

15 6 bicycle spaces are proposed in the basement and a waste store added to the rear of the building in an existing landscaped area.

Site Building Location

16 The application site is well located. It is within Public Transport accessibility level (PTAL) 6a (on a scale of 1-6 where 6 is excellent). It is less than 50m from Uxbridge Station and sits in the middle of the town centre with all its facilities.

17 The site is in flood zone 1 (see appendix 2). As such there is no requirement for a flood risk assessment.

18 The building is a four storey building with a large basement, The shop on the ground floor contains the main use. The basement was used for storage ancillary to the shop use and the first floor to third floor were used as ancillary offices. The Carphone Warehouse retail unit was established before 2011, the office use being required to process mobile phone purchases from the shop below. The office use declined as the transaction elements of phone purchase moved on line and on-phone.

- 1.9 The building is a mid 19th Century yellow London stock building with sash windows and stone cornicing and pediments with a small set back roof. The building has been significantly altered with a modern shopfront and with a lift shaft and solid walls and flooring.
- 1.10 The building is Listed (Grade II) along with other high street buildings and forms part of the Uxbridge/Windsor Street Conservation Area.
- 1.11 The proposals are submitted with a Heritage Impact Statement that assesses the effect of the proposals on local heritage assets including the application building and on neighbouring buildings.
- 1.12 The applicants undertook pre-application discussions with the Council on a similar change of use (office to residential) of the upper floors but also included a 5m rear extension extending over the upper floors. The Council's response to those proposals have conditioned this application which has removed the rear extension and concentrated on the change of use of the upper floors of the existing building,
- 1.13 In addition, this application proposes a new front entrance creating an amended shopfront to secure residential access from the front of the building. A new rear entrance is also proposed at first floor level via a new external staircase.
- 1.14 Cycle parking and access thereto is proposed in the basement along with a new external bin store and landscaped area at the rear of the building.
- 1.15 The main issue in this application is the impact of the works on the Listed Building and on the local character and distinctiveness of the Conservation Area.

- 1.16 The Heritage Assessment attached to this application sets out the significant and unsympathetic changes were made to the Listed building in the 1970's and 1980's. They include inserting concrete floors internally including the basement, inserting a new roof structure, new staircases, modern shopfront and new rear windows and elevation. These works have stripped out most or all of any internal features of historic or architectural value.
- 1.17 The Heritage Assessment therefore considers the application in the light of the proposed changes preserving the historic frontage at and above first floor level, the part of the building that has value to the Listed Building and to the Conservation Area.

2. Recent Planning History

- 2.1 The site's planning history on Hillingdon's website relates to recent applications for change of use to the ground floor shop and shopfront. These applications were withdrawn.

Reference	Location	Proposal	Received	Status
<u>8248/ADV/2021/32</u>	25-26 HIGH STREET UXBRIDGE UB8 1JN	Installation of 1x externally illuminated fascia sign and 1x externally illuminated projecting sign	25-08-21	Withdrawn (P)
<u>8248/APP/2021/3253</u>	25-26 HIGH STREET UXBRIDGE UB8 1JN	Installation of external plant to rear elevation of building at ground floor level, replacement timber doors to existing shopfront, modification of decorative molding to one of the existing columns within the ground floor frontage, installation of partitions at ground floor level and new internal lift between basement and ground floor level, and display of externally illuminated fascia signage and an externally illuminated projecting sign (Application for Listed Building Consent)	25-08-21	Withdrawn (P)
<u>8248/APP/2021/3256</u>	25-26 HIGH STREET UXBRIDGE UB8 1JN	Change of use of currently vacant, former retail shop (Class E(a) use) to a mixed restaurant and hot food takeaway (sui generis use), incorporating alterations to the existing shopfront including the provision of new timber doors and also the installation of a plant and extraction system to the rear, and the display of	25-08-21	Withdrawn (P)

externally illuminated
fascia signage and an
externally illuminated
projecting sign

Planning pre-app

- 22 The current owner submitted a pre-application request (8248/PRC/2021/179) to Hillingdon which the Council responded to in November 2021. The proposed pre application scheme was to convert the upper floor to residential use with a 5m rear extension over the upper floors.
- 23 The following Table sets out a summary of the Council’s main pre-application comments on the pre-application scheme and in the second column, how the applicant’s proposed amendments to the scheme overcomes the pre-application issues raised.

Summary of Pre-application Comments by LB Hillingdon	Response and changes proposed to the application scheme.
The proposed development lacks any justification. Furthermore, no heritage statement has been submitted. A clear understanding of the historic building and surrounding historic environment would be required from the outset of the design process. In any instance a heritage statement and impact assessment would be required as part of any Planning and Listed Building Consent application.	Heritage Statement completed with application that considers impact of new application. Note that the rear extension has been removed from the application proposals.
It is understood that the entire building has not been surveyed, and this would need to be carried out in order to inform the repairs required to the building.	Survey has been completed
The creation of a new access from the High Street and convoluted subdivision of the ground floor would not be acceptable as proposed. Whilst the central double access arrangement aims to replicate the existing arrangement to N025, if a compromise was made in regard to a residential entrance along the High Street elevation it would need to be far more discreet, ideally set to one side. This would also allow for the subdividing wall to be straightened, avoid	Access to residential floors at ground floor front is set on the right hand side as suggested,

the creation of the 'nook'.	
The proposed rear extension would obscure a large proportion of the rear elevation, not appear subservient to the original building, impact on the external wall of the original building, result in loss of historic windows and there would concerns in regard to the short distance between the rear addition and the Charter Building to the south-west.	Rear Extension removed
Further investigation would be required in regard to the internal walls, original internal layout and floor and ceiling construction (above suspended ceilings). This would provide an understanding as to whether any are original or retain historic built fabric of interest.	Heritage Impact completed
. There would be some concerns in regard to the lack of natural ventilation to the bathrooms. It is important high moisture environments are well ventilated, particularly in historic buildings to prevent damp. The addition of external vents and flues associated to the bathrooms and kitchens, is likely to clutter the appearance of the original building.	These matters are considered in the Heritage Impact statement but removal of unwanted vents and flues etc. is proposed
The proposals fail to take the opportunity to reinstate lost features such as the fireplaces, enhancing the significance of the building. It is not clear how the existing lift shaft would be closed off. In any instance a full schedule of repairs to the building would be required as part of any Planning and Listed Building Consent applications.	These matters are considered in the Heritage Impact statement but so much of the internal parts of the building are missing, the re-instatement of lost features would appear incongruous.
As proposed the development is considered likely to result in harm to the listed building and the character or appearance of the Conservation Area and could not be supported by the Council.	Substantial changes to proposals from the pre-app are now proposed. Removing the large rear extension will ensure that the proposals will not result in significant harm.
There would concerns in regard to the short distance between the rear addition and the Charter Building to the south-west	The removal of the rear extension building removes these issues.

and the oppressive and overbearing outlook to the occupants of the frontage buildings along High Street resulting from the rear extension. In particular, the adjacent listed building at the 3 Tuns has a first floor bedroom window which would face the proposed flank wall of the extension at a short distance which would result in an unacceptable loss of light and outlook to the occupants of this room. The proposed rear extension is considered to result in an unneighbourly form of extension and could not be supported by the Council.	
It is considered that given the extensive parking controls within the surrounding area (which inherently act a deterrent to potential displacement impacts resulting from car ownership/use) coupled with the 'very good' public transport connectivity of the location, it is highly unlikely that the lack of on-plot parking for this proposal would in fact impinge on the neighbouring highway in the form of undue parking displacement. On that premise, the 'car-free' proposal as presented is accepted in principle.	Car Free proposal is acceptable-noted
The only parking requirement in this case is related to providing a 1 secure and accessible cycle space per unit in order to conform to the Council's adopted cycle parking standard totalling 6 spaces. 5 communal spaces are shown within the basement which is considered acceptable once an uplift to 6 spaces is incorporated.	Only 3 cycle spaces are required for the three flats proposed-see basement plan on submitted application
Council standards which require that a bin storage area should be located within the region of the Council's maximum 'waste collection' distance of 10m from a bin store to the waste collection point (i.e. refuse vehicle) on the public highway. Additionally, carrying distances from each residential unit to the bin store should not exceed a distance of 30m in order to accord with the waste collection standard	Bin stores proposed at rear of site that meet the standards defined.
The proposal indicates that a new pedestrian link will be created through the rear garden of the property. A garden area with (new) soft landscape is indicated. There is no objection to the removal of existing vegetation, subject to the provision of replacement planting within an	Landscaped garden area at rear is proposed on application site plans.

enhanced area of hard and soft landscape.	
No accessibility concerns are raised at this stage however, any firm planning proposal should take into consideration the requirements of London Plan policy D5 to ensure that the highest standards of accessibility and inclusive design are maintained.	Same level of accessibility is achieved- note that this is constrained by the need to retain the character of the Listed Building and Conservation Area.

- 24 The conclusion of the pre-application response was that the proposed development, would in the Council's view, by virtue of the large rear extension, result in an unneighbourly development which would result in harm to the Listed building and the character or appearance of the Conservation Area. The application proposals remove the rear extension in its entirety and propose a development that does not effectively harm the Listed Building nor undermine the character of the Conservation Area. The proposed interventions in the existing structure and elevations of the building are limited and in my view acceptable.

3. Proposals and Planning Policy

Planning Policy

- 3.1 This application should be in broad accordance with National (NPPF 2021), Regional (London Plan 2021) and local planning policy (Hillingdon's Strategic Policies 2012 and Development management Policies 2020).

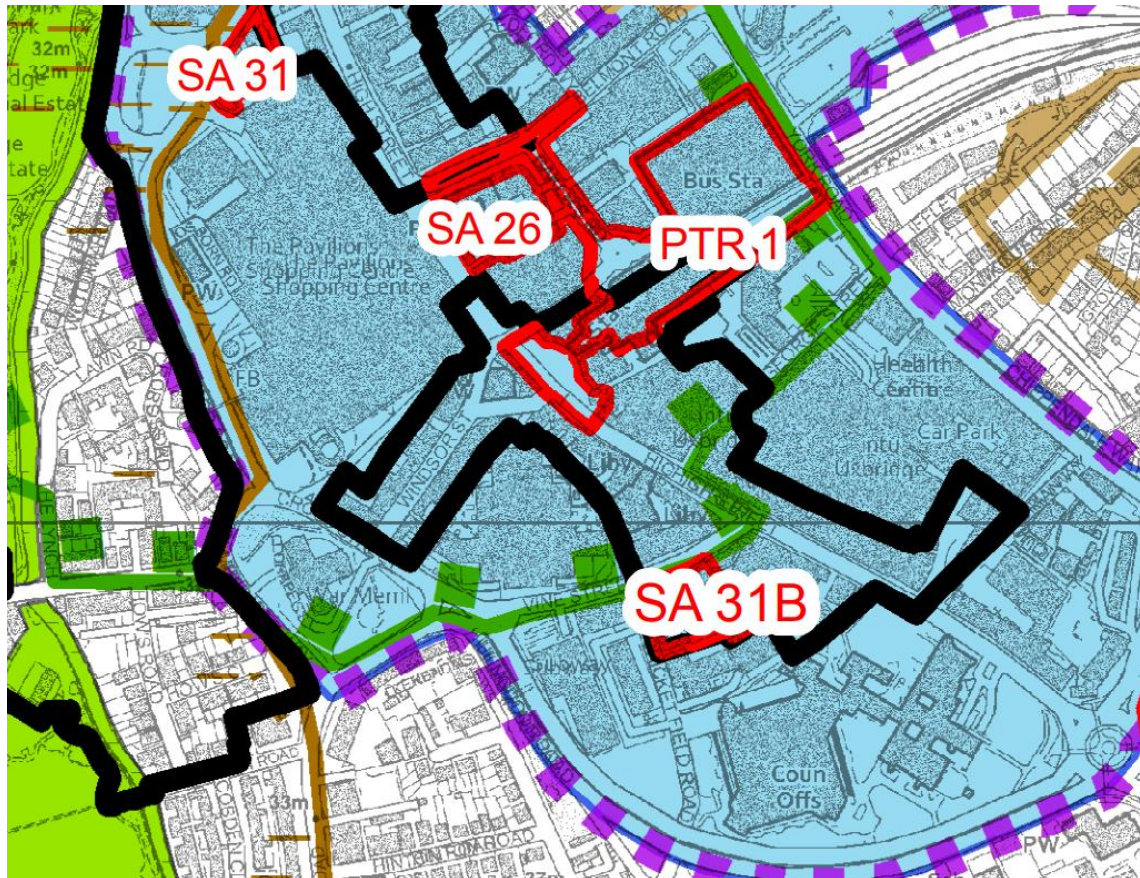


Photo 3 -Extract from Policies Map

Policies Map

- 3.2 The application site is Uxbridge Town Centre within an hotel and office growth location, a Consevation Area and an Archaeological Priority Area.

Heritage Issues

- 33 The main issue in this application is the impact of the proposed alterations and change of use on the Listed Building and the effect those proposed changes may have on the character and appearance of the Conservation Area in which it sits.
- 34 This application is supported by a Heritage Significance, Impact Assessment and Justification Statement produced by consultants Heritage Information Ltd. The Heritage report sets out, in some depth, the heritage policy and considerations of Hillingdon's Local Plan, the London Plan 2021 and the NPPF 2021 and how the proposed application meets those policies. I do not propose therefore to repeat the policies and how they have been applied, but to summarise how the buildings heritage significance is preserved by the limited range of physical interventions on the historic fabric of the building.
- 35 The heritage report sets out the heritage value of the existing building. The report notes the significant unsympathetic alterations made to the building in the 1970's and 1980's. These include new internal concrete floors (including to the basement), new rear elevations and windows, new roof structure, replacement staircases and modern shopfronts. There is little or no heritage features remaining in the current building.
- 36 The heritage report classifies the architectural and historical interest of the Listed Building as 'Low to medium'. The Council asked the applicants to consider what opportunities there were to reinstate/repair any significant historic features. This is considered, by the heritage consultants, as unworkable as there are no significant historic features left in the building.
- 37 The Heritage report gives the Setting Value of the building as 'medium'. More precisely it is the setting of front upper floors of the building that provides its value and it is that area that is least affected by the proposed alterations and change of use.

- 3.8 There are two main interventions in the building, the new front residential entrance and the rear first floor entrance. Both these interventions propose changes to modern parts of the building fabric in areas that do not contribute positively to the historic and architectural interest of the Listed Building.
- 3.9 Likewise the sum of the proposals do not harm the character and appearance of the Conservation Area.
- 3.10 As the scheme proposed conserves those features which contribute to the hertiagesignificance of the site, the proposals meet the objectives of Hillingdon’s Strategic Policy HE1. The proposals design is led by an understanding of the subject site and its heritage significance and meets the test imposed by Hillingdon’s Development management policies 2020, DMHB1.
- 3.11 The NPPF 2001 concludes 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’
Para 202 NPPF 2001
- 3.12 The Heritage report’s conclusion is that the proposals lead to no harm to the Listed Building let alone less than the ‘substantail harm’ that would require refusal under local plan policy DMHB2. The Government’s NPPF test is that proposals to listed buildings should lead to less than substantial harm to a designated asset. The proposals in this application exceed this test. There is of course in addition a public benefit of finding an optimum viable use for the building which helps, in a small way, to help meet Hillingdon’s housing targets and provide residents that may help to bring life to the town centre.

- 3.13 The applicant's heritage advisor also completed an analysis of the building in the context of local townscape views and the impact of development upon them. They concluded that the proposals overall will have a negligible to minimal and neutral visual impact on the local townscape character and the setting, character and appearance of the Old Uxbridge/Windsor Street Conservation Area.

Housing Supply and small sites

- 3.14 The Council's London Plan Housing targets of 1083 dwellings for each of the next 10 years are not being met. The Government allows a lesser test, the 2021 Housing Delivery test that examines whether local authorities have a current supply of dwellings to meet need and Hillingdon meets this test. However new housing targets are substantially higher than the current housing need figures. In addition the Adopted London Plan policy H2 also sets out the amount of housing development that needs to be delivered on small sites, below 0.25 ha. 27% of Hillingdon's housing target (295 dwellings p.a. of the 1083 target) is expected to be developed on small sites, between 2019 and 2029. This underlines how important small sites are in the delivery of the boroughs housing target. The provision of dwellings in a highly accessible town centre location, however small in number, is an important benefit of the scheme.

Ancillary Uses

- 3.15 The basement storage and upper floor offices were ancillary to the retail shop. Policy DME3(D) of Hillingdon's Development Management Policies relates to the loss of office floor space in town centres as follows:
- 'Proposals involving the loss of office floorspace within designated town centres should be supported by evidence of continuous vacancy and marketing over a 12 month period.'

3.16 While it is arguable whether the policy applies to this ancillary use, nevertheless a more than sufficient period of marketing has been carried out. Appendix 3 shows the marketing exercise carried out by Eric Surveyors and Estate Agents including details and Estate Agents Board on the premises. Details were sent out from 7th August 2020 and was listed on the companies website and marketed through EGI propertylink.

3.17 This period of marketing from August 2020 meets the test set out in policy DME3 should it be applied.

Bicycle Parking and waste bin storage

3.18 The London Plan 2021 cycle standard in Table 10.2 requires 5 bicycle parking spaces (1.5 spaces for each of the two-bed flats) and 6 spaces are accommodated in the basement. A cycle ramp is provided to allow the comfortable passage of cycles down the stairs to the basement.

3.19 Waste bin storage to meet demand from the residential units is placed to the rear of main building.

3.20 A small landscaped garden area will be created between the new waste store and the application building.

Car Free Development

3.21 The Council, in its Pre-application response, has supported the proposal of a car free agreement. None of the flats will be able to secure a residents parking permit. This is supported because of the excellent public transport facilities within the town centre.

Amenity

3.22 The proposed change of use of the upper floors to residential are contained within the existing building envelope and therefore do not give rise to amenity problems for their close neighbours.

Access

- 3.23 The new proposed ground floor access at the front of the building has been moved from the centre of the shop(in the pre-application submission) to the right hand side of the retail unit. The access is suitably set back. As the shop front is modern, the new entrance does not compromise the Listed Building but will be constructed in complementary materials to those in the current shopfront.
- 3.24 The rear access is at first floor level and the entrance door replaces a window, accessed by a new set of metal stairs. The Council was concerned, at the pre-application stage, that the entrance might replace an historic window. The Heritage Report concludes that the window and brickwork that the new door replaces is modern and has no impact on the value of the Listed Building.
- 3.25 The front residential access is created to take advantage on the well lit and overlooked High Street, which also has the benefit of creating activity of the High Street. The rear access allows access to bike and bin stores, but given its location, additional lighting and cctv is proposed to aid security.

London Plan floor space standards

- 3.26 The proposed three flats meet London Plan 2021 flat size standards and bedroom size standards and storage standards. It is not possible to create amenity space such as balconies without compromising the Listed building. However as explained in the Design and Access Statement, good local open space exists nearby.

4. Conclusions

- 4.1 The application site is in a busy town centre location with excellent public transport access within a building suitable to supply additional homes through conversion. The London Plan 2021 supports and promotes the intensification of residential development on small sites through such measures as conversions in this location.
- 4.2 The heritage value of the building does not exist in the internal built fabric as most or all of the historic features internally have been removed in the past. The Value of the building is in its setting, views and front elevation. This is left intact by the application proposals.
- 4.3 The Proposals do not harm the historic or architectural value of the Listed Building nor do they harm the character and appearance of the Conservation Area in which it sits.
- 4.4 No amenity issues arise from the proposals. The proposals meet London Plan space standards.
- 4.5 Sufficient cycle and waste storage is provided on site.
- 4.6 The Car Free nature of the scheme is appropriate. Sufficient waste storage and bicycle parking is provided.
- 4.7 The new accesses to the residential floors of the building do not harm the listed building.
- 4.8 For these reasons the proposals should be supported. The proposals are sustainable and following National planning guidance (NPPF 2021) should be consented.

David Carroll M.SC. MRTPI

Dave Carroll Planning Limited

February 2022

Appendix 1 Flood Risk Zone

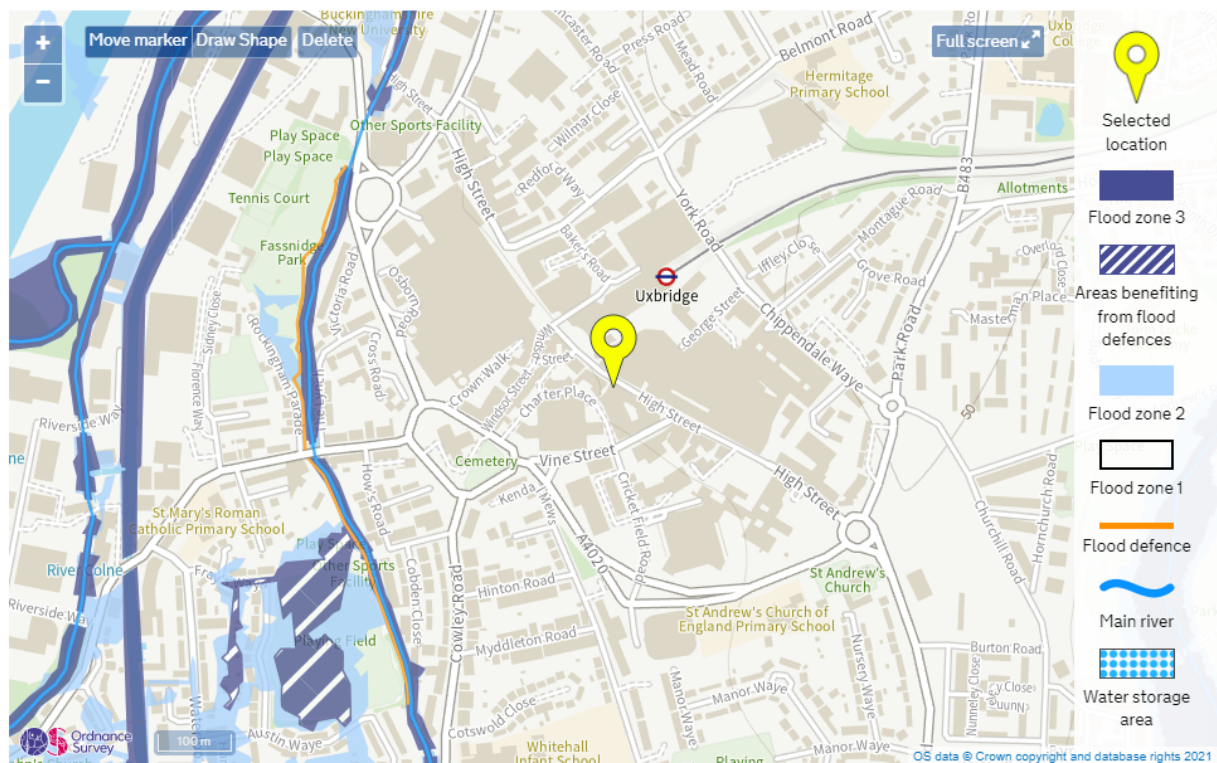
ion?easting=505613&northing=184042&placeOrPostcode=UB8%201JN

Likelihood of flooding in this area

You can move the marker  on the map to identify a specific location.
Alternatively draw a shape to identify an approximate site boundary.

► [How to draw a shape](#)

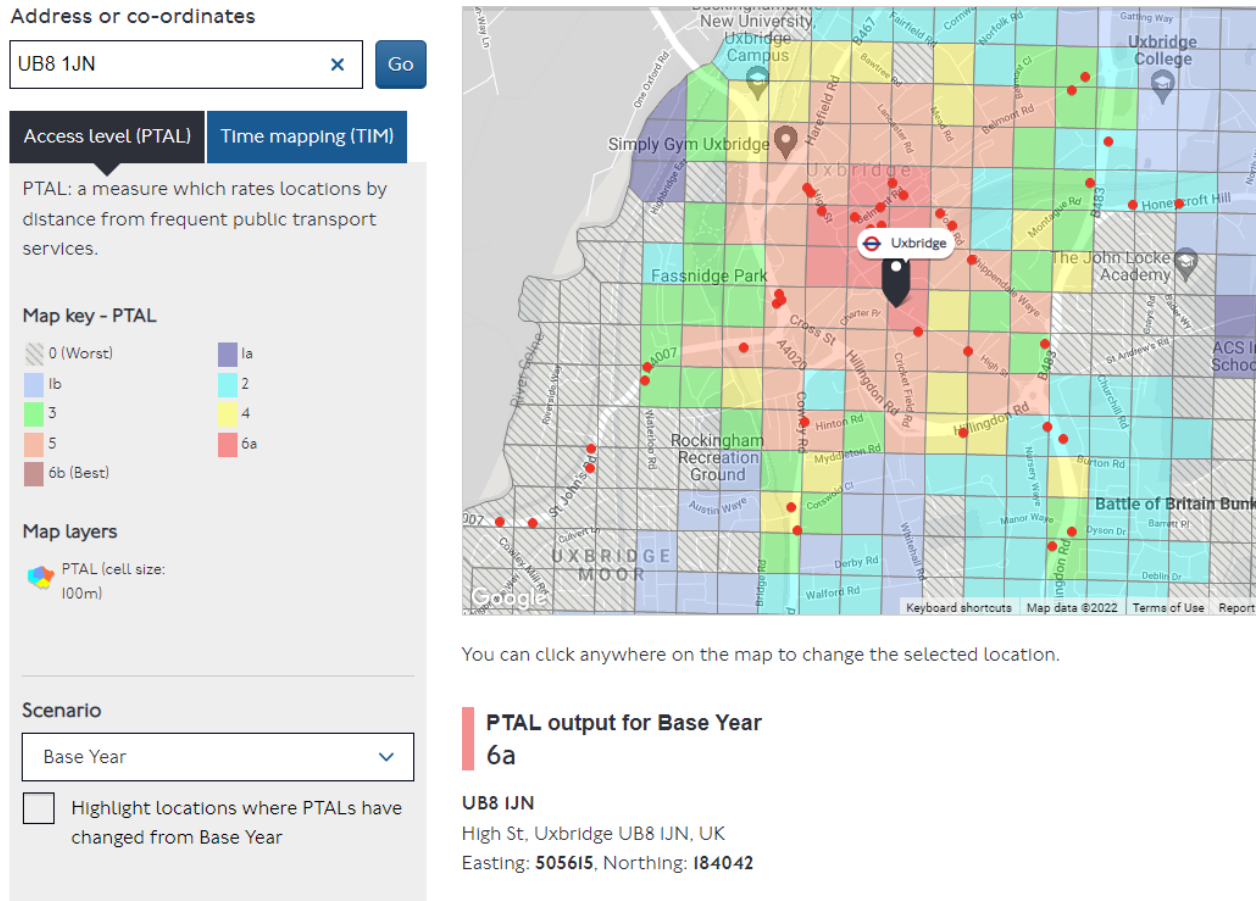
Download printable map (PDF)



☒ Show flood zones

EA Flood Risk Map. The site at 25-16 High Street, Uxbridge is in flood zone 1. Very Low risk of flooding as well as very low risk of surface water flooding

Appendix 2 Webcat PTAL Public Transport Accessibility Zone



The application site has Excellent Transport Accessibility- A PTAL of 6a (on a scale 1-6 where 6 is best)

Appendix 3 Marketing Details



PRIME SHOP TO LET

With Upper Floors and Basement



25/26 High Street UXBRIDGE UB8 1JN

Ground Floor	107 sq m 1152 sq ft
Upper Floors	138 sq m 1488 sq ft

25/26 High Street UXBRIDGE UB8 1JN

Location

Hub High Street position opposite Station, with additional prominence to pedestrians using the main entrance to the INTU Shopping Centre. In the heart of this busy Shopping and Office centre.

Accommodation

Net Frontage	9.22 m 30 ft 3 in
Shop Depth	16.84 m 55 ft 3 in
Internal Width(max)	8.84 m 29 ft
Ground Floor Sales	107 sq m 1152 sq ft
Basement	51.7 sq m 556 sq ft
First	48.6 sq m 523 sq ft
Second	47.5 sq m 511 sq ft
Third	42.2 sq m 454 sq ft
Total	297 sq m 3196 sq ft

Terms £90,000pa; new 10 year lease on FRI terms with 5 year rent review.

Rates RV £63,500. Nil Rates Payable until 30 June 2021. Then estimated at £8,128 for period to 31 March 2022.

Legal Costs Each side to pay their own costs.

EPC Available on request.

VIEWINGS BY APPOINTMENT ONLY

or for further information *please contact:*



Steffen Frost 07907 772588 Tim Frost 07711 698418

01494 422 359 office@ericsurveyors.com

These particulars are provided as a general guide only and all details should be checked independently. Subject to contract. No representation or warranty is intended to be made or given by these particulars.



25-26 High Street with To Let sign