

PLANNING AND TRANSPORT STATEMENT

SITE ADDRESS: 25-26 High Street, Uxbridge, UB8 1JN

DATE: September 2024



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Executive Summary

This statement has been prepared by Total Planning to support an application for conversion of the vacant upper floor levels to residential comprising 3 x 2 bedroom flats with associated works including provision of cycle and refuse storage and external/internal alterations including insertion of new walls/doors and demolition of non-original walls.

There is Local and London Plan support for making more efficient use of sustainable, underutilised vacant buildings for the delivery of residential accommodation, particularly where this safeguards the long term conservation of a listed building.

The proposal relates to a vacant upper floor premises to a listed building located centrally in Uxbridge town centre and it is a highly sustainable location.

The accompanying Commercial Office Availability & Leasing Report prepared by Rose Williams Commercial Property Consultant is considered to demonstrate that this empty office space is surplus to requirements and there is no realistic prospect of it being re-used as an office or alternative commercial use, particularly given the heritage constraints. Therefore, the proposed loss of office floorspace is considered acceptable in this case and its alternative use should be supported, in accordance with adopted planning policies.

The works are considered to result in a neutral impact on the character, appearance or historic interest and significance of this particular listed building and the Old Uxbridge/Windsor Street Conservation Area. This neutral impact should be considered alongside the considerable benefits of the proposal in bringing this building back into beneficial use after a period of vacancy and stem a number of condition issues that have been highlighted in the accompanying Heritage Statement, as well as see the original exterior features of the building receiving now regular maintenance it requires.

The proposal would be considered meet adopted policies with regards to heritage and visual amenity as the proposal would not lead to any harm visually or to the fabric of this listed building, or the setting of the surrounding conservation area.

The development would provide 3 spacious 2 bedroom flats that would be dual aspect and stacked on each floor, providing a good level of accommodation for future residents.

The location of the site is appropriate for this car free development that would encourage public transport and alternative green modes of transport.

Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of Council's Local Plan.

The Site

The site is located on the southwestern side of the High Street, approximately 7m east of its junction with Windsor Street, and immediately opposite the main entrance to the Chimes Shopping Centre, Uxbridge.



Location of application site in town centre

The site comprises a mid-terrace building known as 125-126 High Street, Uxbridge. It is a Grade II listed four storey building (along with No. 27 High Street) dating from the mid 19th Century within the Old Uxbridge/Windsor Street Conservation Area and the primary shopping area of Uxbridge. The conservation area was designated in 1973 as Windsor Street CA but later amalgamated in 1987 to create Old Uxbridge / Windsor Street CA and thereafter, a revision to incorporate extensions and deletions in 1988.

The building has a strong sense of hierarchy, this is particularly evident to the front with proportionately smaller upper floor windows. The window also includes decorative stone stucco surrounds. The central bay sits slightly forward, and two pediments feature over the first floor windows.

The windows are all single glazed timber sash windows with a spiral-spring balance system. Whilst the open mechanism appears to be altered, the windows themselves appear to be of historic interest and retain the original glazing pattern, with margin lights.

The shop front along the ground floor is not original, it was likely altered in the early to mid-20th century. Whilst now comprising of two units, originally it is likely the ground floor was either split into three individual units or was one large unit. In any instance, originally the shop front and signage would have had a uniform appearance.



The application property and No. 27 High Street, Uxbridge

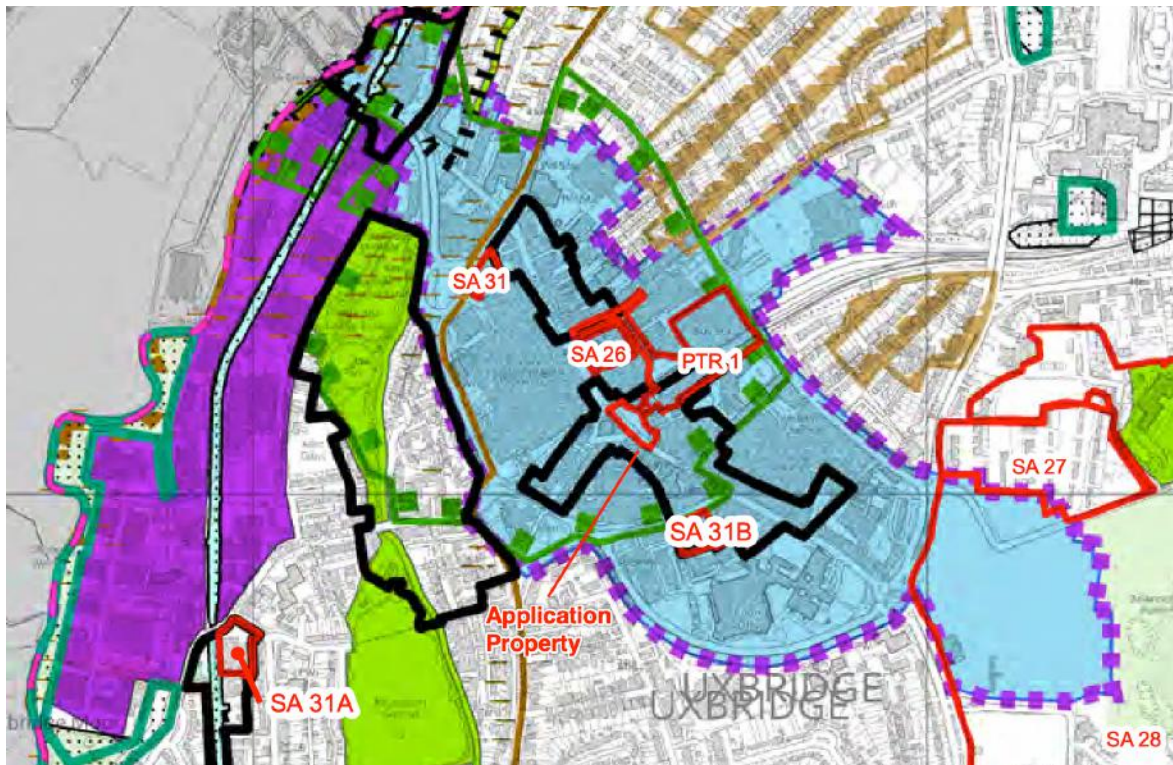
Internally accommodation is spread over 4 floors. The original brick vaulted cellars are extant towards the High Street end of the building, however external vents have been lost. Internally they are in a reasonably well-preserved condition and are of significant historic interest.

It is evident some aspects of the building have been altered however it is not clear when such works took place, but they are considered historic (see photographs of the building in Appendix 1). There is evidence of modern finishes, modern structural supports, concrete floors and the insertion of a lift shaft. Solid walls are evident on the upper floors. To the rear the property has been extended at ground floor and within the basement. It comprises of a larger flat roofed addition with access to the flat roof at first floor level. The existing building is prominently located within the centre of Uxbridge, amongst a number of other Listed Buildings. It is a prominent and exposed building with clear views of the rear aspect of the site from Charter Place (off Windsor Street) and the service road to the south-east of the site. The building is historically and architecturally significant in its own right however is also an important, positive contributor to the significance of the conservation area and street scene.

The building has recently had approval to create a direct entrance from the street to the first floor to access the vacant space on the upper floors from the street (8248/APP/2022/2664). Works have been recently carried out to implement the proposal and the coffee shop is now in operation.

The surrounding area is characterised by mainly commercial mixed use properties, with many containing residential on their upper floor levels. The aerial image above shows the central position of the application property in relation to the main two shopping centres in Uxbridge town centre and the tube station which is opposite and Charter Place which is situated to the rear.

In terms of land use policy constraints, the site is situated within Uxbridge town centre, a conservation area, and Archaeological Priority Area (see policies map below).



Hillingdon Policies Map

The site is also located in Flood Zone 1 which is an area at least risk of flooding. It has a PTAL rating of 5 which indicates that there is good level of public transport accessibility.

Proposed Development

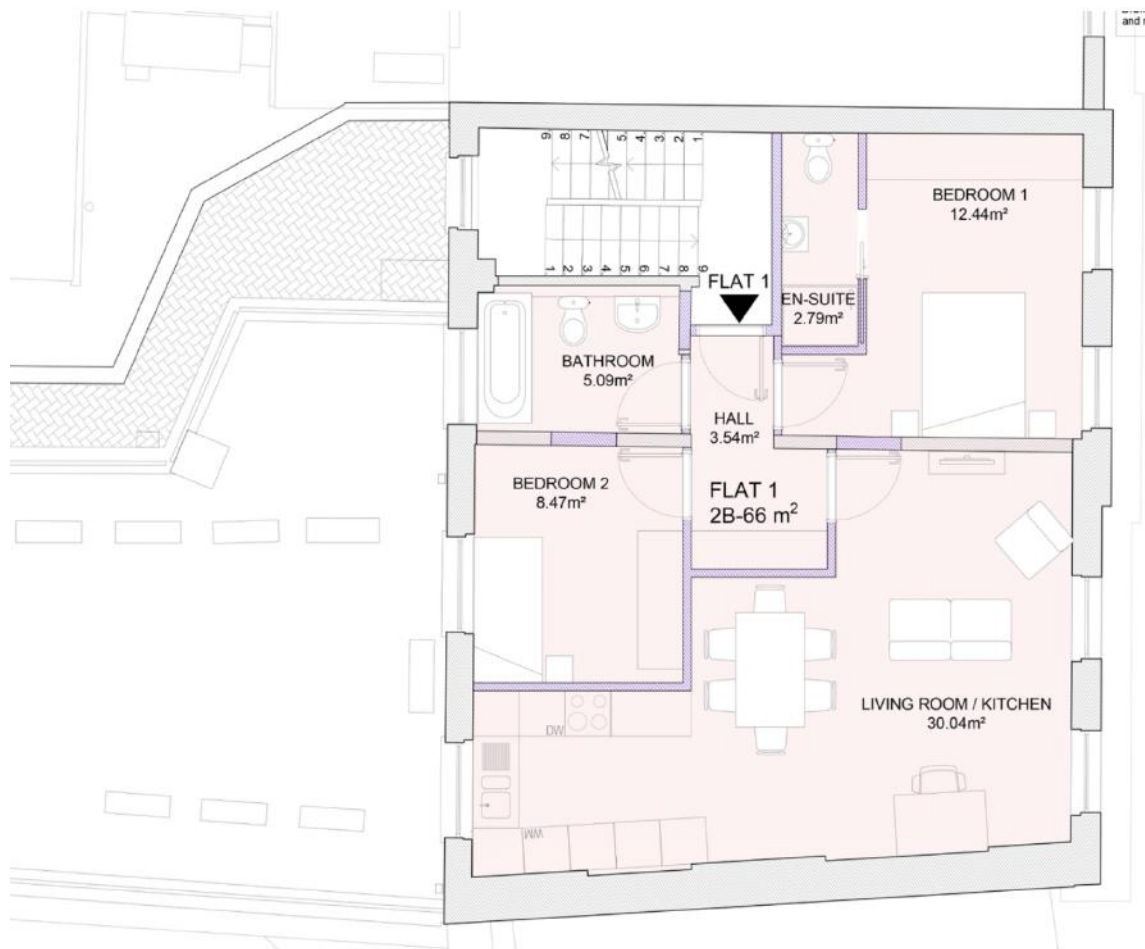
This application seeks planning permission for conversion of the vacant upper floor levels to residential comprising 3 x 2 bedroom flats with associated works including provision of cycle and refuse storage and external/internal alterations including insertion of new walls/doors and demolition of non-original walls.

This application will also seek Listed Building Consent.

The proposed flats are all 2 bedroom 3 person properties and they would measure internally 66sqm, 66.5sqm, and 67.4sqm.

The proposal does not seek any changes to the front of the building. To the rear, very minor alterations are sought externally including blocking up an opening and modifications to the basement access.

This application is accompanied by a full set of existing and proposed drawings, as well as a Design and Access Statement prepared by USL Architects. The Design and Access Statement contains a typical flat design layout which is shown below. It demonstrates that very limited demolition, or even alterations to the internal layout of the building are required to deliver the proposed 3 flats which would each occupy an entire level of the premises.



Typical flat layout in proportion to the existing building

This planning statement should be read alongside this submitted Design and Access Statement, the accompanying Heritage Statement by Sam Falco, and the Commercial Office Availability & Leasing Report prepared by Rose Williams Commercial Property Consultant.

Planning History

As mentioned earlier in this statement, this application follows a recent planning permission to create a direct entrance from the street to the first floor to access the vacant space on the upper floors from the street (8248/APP/2022/2664). Works have been recently carried out to implement this proposal and the coffee shop is now in operation on the ground floor level. This is the most relevant planning permission to this latest proposal as it means that no external changes are needed to the front of the building to allow for a separate access.

Nevertheless, the planning history for this site is relatively significant and is set out in the table below.

Reference	Development Proposal	Date	Decision
8248/APP/2024/193	Erection of pair of retractable awnings with valences to shopfront (Application for Listed Building Consent)	14-03-2024	Approval
8248/ADV/2024/6	Erection of pair of retractable awnings with valences to shopfront with company name and logo (advertisement consent) (amended description)	01-02-2024	Approval
8248/ADV/2023/42	Installation of 2 x non-illuminated fascia signs, 1 x externally illuminated projecting sign and nonilluminated signage and graphics to outdoor planters. (RETROSPECTIVE)	26-01-2024	Approval
8248/APP/2023/2601	Repainting of existing shop front, erection of non-illuminated fascia signs and an externally illuminated projecting sign and internal, ceiling mounted, non-illuminated roundel sign. Internal fit out as coffee shop (Application for Listed Building Consent). (RETROSPECTIVE).	26-01-2024	Approval
8248/APP/2023/875	Details pursuant to the discharge of Condition 3 (Details of direct entrance) of Listed Building Consent ref. 8248/APP/2022/2664, dated 31-10-2022 for the creation of a direct entrance to the upper floors to link the existing staircase to the pavement.	15-05-2023	Approval
8248/APP/2022/2664	Creation of a direct entrance to the upper floors to link the existing staircase to the pavement (Application for Listed Building Consent)	31-10-2022	Approval
8248/APP/2006/1549	INSTALLATION OF ONE EXTERNALLY ILLUMINATED PROJECTING BOX SIGN AND TWO NON-ILLUMINATED FASCIA SIGNS (APPLICATION FOR LISTED BUILDING CONSENT)	01-08-2006	Approval
8248/ADV/2006/40	INSTALLATION OF ONE EXTERNALLY ILLUMINATED PROJECTING BOX SIGN	15-08-2006	Approval
8248/ADV/2005/120	INSTALLATION OF 2 EXTERNALLY ILLUMINATED FASCIA AND ONE PROJECTING SIGNS.	22-02-2006	Refusal
8248/APP/2005/3335	INSTALLATION OF 2 EXTERNALLY ILLUMINATED FASCIA AND ONE PROJECTING SIGNS (APPLICATION FOR LISTED BUILDING CONSENT).	09-02-2006	Refusal
8248/ADV/2003/15	INSTALLATION OF TWO NON-ILLUMINATED FASCIA SIGNS AND AN EXTERNALLY ILLUMINATED PROJECTING BOX SIGN	10-02-2004	Approval
8248/APP/2003/521	INSTALLATION OF TWO NON-ILLUMINATED FASCIA SIGNS AND AN EXTERNALLY ILLUMINATED PROJECTING BOX SIGN	10-02-2004	Approval

	(APPLICATION FOR LISTED BUILDING CONSENT)		
8248/APP/2002/2380	INTERNAL ALTERATIONS AND REMOVAL OF EXISTING FILM AND LOGO FROM THREE WINDOWS (APPLICATION FOR LISTED BUILDING CONSENT)	10-01-2003	Approval
8248/APP/2002/670	INTERNAL ALTERATIONS AND REMOVAL OF EXISTING FILM AND LOGO FROM 3 WINDOWS (APPLICATION FOR LISTED BUILDING CONSENT)	25-09-2002	Refusal
8248/APP/2000/1389	INSTALLATION OF NON-ILLUMINATED INDIVIDUALLY APPLIED LETTERING AND AN EXTERNALLY ILLUMINATED PROJECTING SIGN (APPLICATION FOR LISTED BUILDING CONSENT)	25-10-2000	Approval
8248/ADV/2000/51	INSTALLATION OF AN EXTERNALLY ILLUMINATED PROJECTING SIGN	25-10-2000	Approval
8248/AG/99/3040	Installation of externally illuminated fascia and projecting signs	04-08-1999	Refusal
8248/AF/99/0472	Internal alteration and installation of a new shopfront and externally illuminated fascia and projecting signs (Application for Listed Building Consent)	04-08-1999	Refusal
8248/AD/98/0895	Installation of a new shopfront and internal alterations (Application for Listed Building Consent)	30-07-1998	Approval
8248/AB/98/0355	Installation of a new shopfront	30-07-1998	Approval

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon Local Plan; the London Plan, the NPPF and supplementary planning guidance by both the London Borough of Hillingdon and GLA.

National Policies

NPPF

The National Planning Policy Framework (NPPF) under paragraph 11 states decisions should apply a presumption in favour of sustainable development and 11(c) stipulates that for decision taking this means approving development proposals that accord with an up to date development plan without delay.

Paragraph 38 stipulates that local planning authorities should approach decisions on proposed development in a positive and creative way. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Chapter 9 of the NPPF refers to 'Promoting sustainable transport'. Paragraph 109 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce

congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision making.

Within this context, paragraph 108 states that transport issues should be considered from the earliest stages of plan making and development proposals, so that:

- a) The potential impacts of development on transport networks can be addressed;
- b) Opportunities from existing or proposed transport infrastructure and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) Opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Paragraph 114 states that for specific applications for development, it should be ensured that:

- a) Appropriate opportunities to promote sustainable transport modes can be or have been – taken up, given the type of development and its location;
- b) Safe and suitable access to the site can be achieved for all users;
- c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Paragraph 115 stipulates that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 117 stipulates that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Chapter 11 of the NPPF refers to 'Making effective use of land'. Paragraph 123 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

Paragraph 128 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

- b) Local market conditions and viability;
- c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) The importance of securing well designed, attractive and healthy places.

Chapter 12 of the NPPF refers to 'Achieving well-designed places'. Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspects of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Paragraph 135 states that planning policies and decisions should ensure that developments:

- a) 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;
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Chapter 14 of the NPPF refers to 'Meeting the challenge of climate change, flooding and coastal change'. Paragraph 159 states that new development should be planned for in ways that:

- a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Paragraph 200 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should

require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.

Paragraph 201 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 203 states that in determining applications, local planning authorities should take account of:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 205 states 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 greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) Grade II listed buildings, or grade II registered parks or gardens, should be exceptional.
- b) Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Paragraph 207 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant funding or some form of not for profit, charitable or public ownership is demonstrably not possible and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

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.

Paragraph 209 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 210 states that local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Paragraph 212 states that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Paragraph 213 states that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Paragraph 214 states that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Regional Policies

London Plan

Policy GG1 Building strong and inclusive communities

Policy GG4 Delivering the homes Londoners need

Policy D1 London's form, character and capacity for growth

Policy D3 Optimising site capacity through the design led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D6 Housing quality and standards

Policy D7 Accessible housing

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D13 Agent of Change

Policy D14 Noise

Policy H1 Increasing housing supply

Policy E1 Offices

Policy HC1 Heritage conservation and growth

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions Policy SI 12 Flood risk management

Policy SI 12 Flood Risk Assessment

Policy SI 13 Sustainable drainage

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy D6.1 Residential parking

Housing SPG

Local Planning Policies

The Hillingdon Local Plan Part 1 - Strategic policies sets out the overall level and broad locations of growth up to 2026. Together with the Local Plan Part 2 Development Management Policies and Site Allocations and Designation documents it forms the Council's future development strategy for the borough.

The Local Plan Part 1 – Strategic policies contains the following relevant policies:

Policy H1: Housing Growth

Policy BE1: Built Environment

Policy HE1: Heritage

The Local Plan Part 2 – Development Management Policies contains the following relevant policies:

DME 3 Office Development

DMH2 Housing Mix

DMH 3 Office Conversions

DMHB 1 Heritage Assets

DMHB 2 Listed Buildings

DMHB 4 Conservation Areas

DMHB 7 Archaeological Priority Areas and Archaeological Priority Zones

DMHB11 Design of New Development

DMHB15 Planning for Safer Places

DMHB16 Housing Standards

DMHB17 Residential Density

DMHB18 Private Outdoor Amenity Space

DMEI9 Management of Flood Risk

DMEI10 Water Management, Efficiency and Quality

DMEI14 Air Quality

DMCI2 New Community Infrastructure

DMT1 Managing Transport Impacts

DMT2 Highways Impacts

DMT5 Pedestrians and Cyclists

DMT6 Vehicle Parking

LPP HC1 Heritage conservation and growth

Principle of Development

The site is not designated in terms of land use in Hillingdon's Local Plan.

This proposal seeks change of use from a vacant office to residential use on the upper floors. Therefore, in terms of principle of development, the 2 key issues to consider are the loss of office floorspace and the acceptability of residential.

Loss of office floorspace

This statement should read in conjunction with the accompanying Commercial Office Availability & Leasing Report prepared by Rose Williams Commercial Property Consultant and the Heritage Statement by Sam Falco.

Policy E1 Offices of the London Plan states that:

'G Development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace.

H The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored.

I The redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H.'

At a local level, Policy DMH 3: Office Conversions of the Hillingdon Local Plan (Part 2) states that:

'A) Where offices are found to be redundant, their demolition and redevelopment for office accommodation will be supported. Where this is not feasible or viable, proposals for the conversion of offices to residential which fall outside of current permitted development rights will be supported where:

i) the conversion of offices provide an external finish that is suitable to a residential building and in keeping with the character of the area;

ii) balconies and/or amenity spaces are designed into the development as integral facilities and the creation of well designed public realm and landscaping is demonstrated;

iii) any additional functional features that are needed such as pipes, flues or communications equipment are grouped together and routed through existing features where possible, and kept off publicly visible elevations; and

iv) proposed homes have a dual aspect wherever possible (see Mayor of London's Housing SPG). A sole aspect home overlooking a parking court or other shared use rear area will generally be unacceptable.

B) All conversions that fall outside of existing permitted development rights will be expected to accord with National and London Plan minimum space and parking standards and meet the requirements of all other policies in this plan, including those in Policy DME 3: Office Development.'

In addition, policy DME 3: Office Development of the Hillingdon Local Plan (Part 2) which states that:

'A) The Council will support proposals for new office development in the preferred locations of Stockley Park and Uxbridge Town Centre, as defined in the Site Allocations and Designations document.

B) Proposals involving loss of office floorspace in preferred locations for office growth, which fall outside of existing permitted development procedures, should include information to demonstrate that:

i) the site has been actively marketed for two years;

ii) the site is no longer viable for office use, taking account of the potential for internal and external refurbishment; and

iii) surrounding employment uses will not be undermined.'

With regards to the loss of the existing office floorspace, the first thing to note is that the premises has been vacant for many years and at least before the start of the Covid pandemic which has had a huge impact on demand for office space. Despite marketing of the property since 2019 through a number of commercial agents, the premises has not attracted any interest for its use as an office.

Accompanying this statement is a Commercial Office Availability & Leasing Report prepared by Rose Williams Commercial Property Consultant which sets out details of how the premises has been actively marketed for over 2 years. This report explains the market conditions which has led to many office buildings being vacant in Uxbridge town centre. This includes details of availability of offices in the immediate Uxbridge market which shows 495,127 sqft currently available of all office types. The report also includes a schedule of these available spaces.

Of the available space there are currently 3 new or back to frame refurbished office schemes in central Uxbridge.

The Charter Building, a back to frame refurbishment provides 240,000 sqft of office space. This was completed in 2016 and the building has struggled to let and has now been split multiple times to accommodate smaller sizes required in the market. Today, 55,000 sqft remains available that has been split into smaller suites.

Also, Belmont, a back to frame refurbishment provides 124,000 sqft of office space. Completed in February 2017 and there is still 45,000 sqft of available space despite the remaining space being subdivided to provide smaller suites.

On the Uxbridge Business Park there are also two new build offices which measure 77,000 sqft and 27,000 sqft. These were completed in 2016 and still 65,000 sqft of floorspace remains empty. There are also a number of empty smaller office spaces in around the town centre.

The accompanying report also includes the marketing particulars for the application property (see below).

Specific to this local policy, the development i) & iii) would not significantly alter the external appearance of the building which is an attractive aspect of the proposal. In terms of amenity space ii) in accordance with the policy can be accommodated into the development. All of the units would be dual aspect dwellings in accordance with para. iv) of policy DMH3. In addition, all of the dwellings would provide well in excess of the minimum internal space standards, each having more than 5 sqm of additional internal amenity space provided to each. Therefore, the proposal would be considered to comply with Policy DMH 3 of the Hillingdon Local Plan (Part 2).

The accompanying Commercial Office Availability & Leasing Report prepared by Rose Williams Commercial Property Consultant is considered to demonstrate that this empty office space is surplus to requirements and there is no realistic prospect of it being re-used as an office or alternative commercial use, particularly given the heritage constraints. Therefore, the proposed loss of office floorspace is considered acceptable in this case and its alternative use should be supported, in accordance with adopted planning policies.

Proposed residential use

It is often well known that residential use of listed buildings is favourable over their use by commercial or public bodies as they often tend to be better taken care of by their occupants. Given the need for more care of listed buildings their residential use is usually better for their long term conservation.

In addition, the premises is empty and has been vacant for several years. Paragraph 119 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

Moreover, Policy GG4 (Delivering the homes Londoners need) sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered, proactively exploring the potential to intensify the use of land and promoting higher density development in appropriate locations. Policy GG3 of the London Plan (Creating a healthy city) requires developments to address mental and physical health in an integrated and co-ordinated way, reducing health inequality where possible, which includes planning for appropriate health and care infrastructure to address the needs of London's changing and growing population.

Policy H1 'Increasing housing supply' of the London Plan states that Boroughs should encourage development on windfall sites not identified in their Development Plan, optimising the potential for housing delivery on all suitable and available brownfield sites/buildings, particularly on sites with existing or planned PTALs of 3-6 or which are located within 800m distance of a station or town centre boundary.

Section 5 'Delivering a sufficient supply of homes' of the NPPF supports the Government's objective of significantly boosting the supply of homes. It states that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Section 11 and specifically paragraph 123 of the NPPF states that decisions should promote an effective use of land in meeting the need for homes and other uses,

while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 125 of the NPPF states that LPAs and other plan making bodies, should take a proactive role in identifying and helping to bring forward land or the reuse of buildings that may be suitable for meeting development needs.

National, regional, and local policies all support the delivery of more housing to meet the needs of the local residents. They also support the re-use of buildings and land that are being underutilised. Adopted policy also supports the long term conservation of existing heritage assets through finding viable uses that ensure their longevity. As such, there is considered to be a range of strategic planning policies that would encourage the re-use of this listed building for residential purposes on the upper floor levels.

Heritage and impact on the visual amenity of the area

This section of the statement should be read in conjunction with the submitted Heritage Statement prepared by Sam Falco which assesses the heritage merits of the proposals.

Chapter 3 Design of the London Plan sets out a series of overarching design principles for development in London and policy D4 Delivering good design seeks to promote world class, high quality design.

The accompanying heritage report considers the significance of existing heritage assets including the listed building 25-27 High Street and the surrounding conservation area.

25-27 High Street is a prominent and imposing yellow stock brick building with stucco window surrounds, stucco banding between its second and third floors and stucco cornicing and parapet to its pedimented central projecting bay. Windows are double hung sashes with slender margin light glazing pattern. Together with the adjoining Listed Grade II HSBC building at 28 High Street and the Grade II* listed Market House to the north-west, they collectively dominate the Market Square area.

When first built it is believed by its frontage arrangement, to have comprised three shop units which likely corresponded with the layout of the upper floors, but designed to appear as a single large building externally. Subsequently its interior has been almost entirely remodelled and subdivided into two distinct parts, one comprising Nos 25 and 26 High Street and the other 27 High Street, which certainly appears to have occurred by the mid C20 by the materials used. The late 1950's image below shows the building to have its stucco detailing painted in two rather distinct colours at the current separation point.



High Street Uxbridge 1950's Note the host building in background. It would appear that the building was split as it is now on the right hand side of the portico by the difference in colour of the stone detailing.

Please refer to the accompanying Heritage Report for full details of its significance.

It should be noted that a later phase of extensive internal remodelling appears to have occurred in the later C20, where the building received considerable reconstruction with a concrete floor plate and concrete block walling. As such, the interior is more reflective of a mid-late C20 large modern commercial unit with a large open floorplate rather than the sequence of smaller rectangular that one would expect to find within such a building.

Firstly, in terms of the visual amenity of the area, the proposal seeks only very minor changes externally and none to the more prominent and historic front. As such, the proposal would not be considered to harm the visual amenity of the area and through repairs and general refurbishment, the development would be considered improve the quality and character of the property.

2 modest changes to the rear elevation would be sought but these would not be visible from the surrounding area and are so minimal in nature, they would not be appreciable. As such, the external changes would also not harm the setting or character of the surrounding conservation area.

Internally, the proposal would include the insertion of a number of new partitions, but as explained above and shown in the accompanying photographs (Appendix 1), the conditions of the inside of the building is poor and not original. As such, the changes sought would not harm the original fabric of the listed building.

The accompanying Heritage Report explains that it has been established that this building has largely been irredeemably sterilised of its historic interest internally,

as a result of the wholesale refurbishment of the building throughout the C20. The internal fabric is formed by modern gypsum plastered walls with suspended panelling or modern stud partitions, ceilings are formed by plasterboard ceilings or suspended ceilings with concrete floor plates above, modern coving, doors, architraves and skirtings. There are very few solid masonry walls remaining.

The historic internal layout has been altered to turn the building from 3 units into 2 and the creation of a single large office over three floors. A modern stair core has been installed to allow access from the new stair core to the various office spaces, where originally it would have likely have had a staircase serving each of the 3 original units. There is little significance derived the current plan form of the building, which now incorporates large open spaces with limited presence of modern concrete blockwork walls that have little relationship with the earlier sequence of formal rooms that would have been present at the time of construction.

The rear of the building retains its restrained historic 'back of house' character, however, there are very limited proposals pertaining to the rear elevation and therefore the impacts of the proposals are considered benign on this part.

The proposed layout is formed by one spacious flat per floor, with the principal rooms making use of the large sash windows that the building benefits from, in much the same manner as the historic layout would have accommodated the principal rooms at the front. On that part there is considered to be a small beneficial improvement by reducing the vastness of the modern open spaces as experienced at present. The internal alterations have generally been considered to have no impact. This is deemed to be so, owing to the entirely modern interior.

Overall the works are considered to result in a neutral impact on the character, appearance or historic interest and significance of this particular listed building and the Old Uxbridge/Windsor Street Conservation Area. This neutral impact should be considered alongside the considerable benefits of the proposal in bringing this building back into beneficial use after a period of vacancy and stem a number of condition issues that have been highlighted in the accompanying Heritage Statement, as well as see the original exterior features of the building receiving now regular maintenance it requires. In conclusion, the proposal would be considered meet adopted policies with regards to heritage and visual amenity as the proposal would not lead to any harm visually or to the fabric of this listed building, or the setting of the surrounding conservation area.

Impact on neighbours / adjacent sites

This proposal would not extend the existing building, nor would it create any new openings that would permit overlooking of neighbouring properties. Given the nature of the change of use, the proposal is not considered likely to harm any neighbouring properties.

Living conditions for future occupiers

The proposal is for conversion of the upper floor levels of a listed building so there are limitations to what can be achieved in terms of accessibility which would be sympathetic to the original fabric of the building. Nonetheless, the access is relatively wide as it has been previously modified and all of the proposed units would be spacious and would accommodate the changing needs of most individuals or couples. As the proposed dwellings are all non family sized units, it is not expected that families would occupy these flats which also limits the risks with regards to the amenity.

However, all of the units as described would be spacious and each would be at least 5 sqm larger than the minimum internal space standard for 2 bedroom 3 person flats. As such, the internal amenity space would comply with local and national planning policies.

It is recognised that the proposed dwellings would not have any access to private external amenity space, however, there is considered to be a number of mitigating circumstances which would lend this development to being acceptable. These are its highly sustainable location in the town centre. The proximity of the building to existing open space at St Andrews and Fassnidge Park. In addition, all of the units would not be for families, as such, the likelihood and need for onsite private amenity space should be significantly diminished. Furthermore, the Major's Housing SPG allows for external amenity space to be offset or alleviated through the provision of additional internal amenity and in the case of this development, all of the units would have excess internal amenity space to a quantum equal to or larger to what the minimum external amenity space is. Therefore, the amenity space available to future residents would be fairly good, especially given the dual aspect nature of all the flats that will have access to large Georgian window openings which will allow plenty of light into the units and permit good passive ventilation.

On balance and taking into account that this is a listed building, the proposed accommodation is considered to be of a reasonable quality to the benefit of future occupiers.

Transport

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

Policy T4 Assessing and mitigating transport impacts of the London Plan states that the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated. Also, development proposals should not increase road danger.

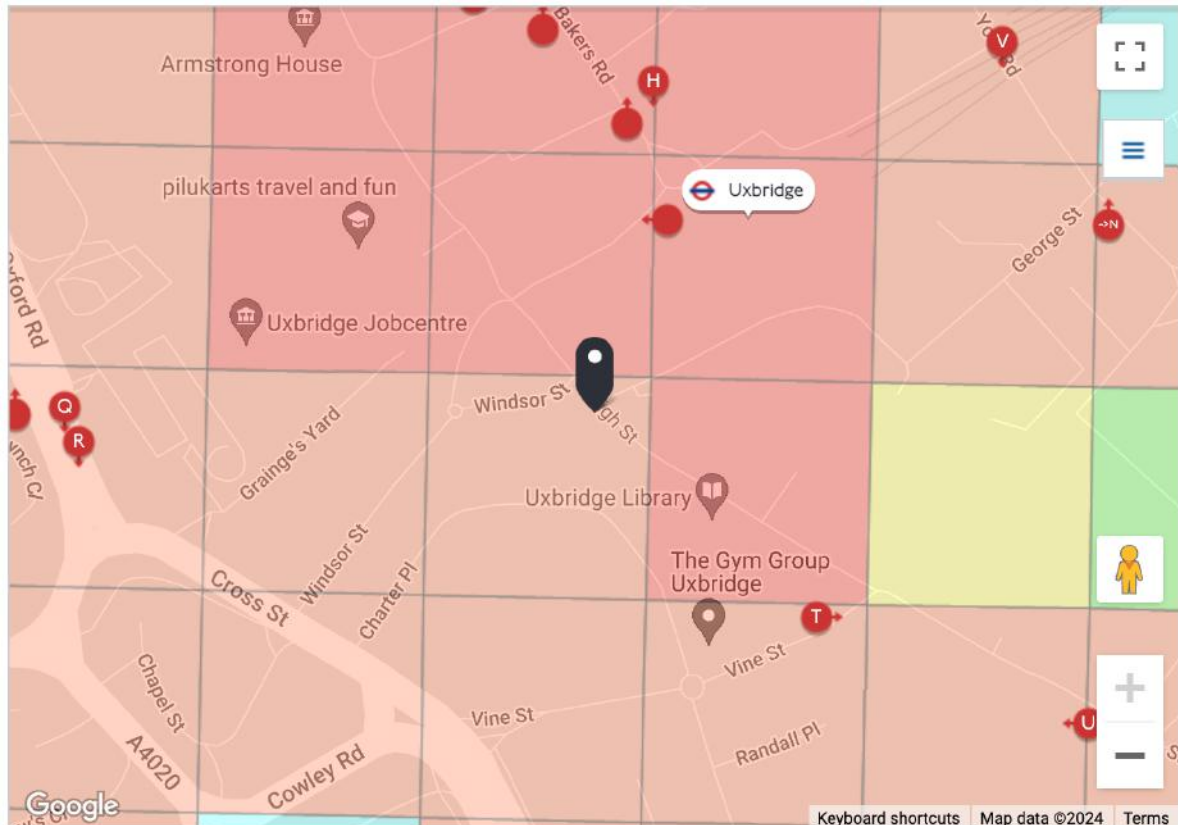
Policy T5 Cycling and Policy T6 Car parking of London Plan are the latest up to date policies with regards to parking for development.

The site has a PTAL rating of 5 and currently provides no car or cycle parking.

In areas of PTAL ratings of 5, car free developments are usually acceptable. However, this proposal will also provide 2 cycle parking spaces for each flat located at basement level., which is compliant with adopted policy. This is considered to be a reasonable level of cycle parking to encourage use of alternative green modes of transport, particularly given the site is located opposite the station.

With regards to servicing, the site will continue to be serviced from the rear, which given this is the existing arrangements is not considered to raise any highway concerns.

Given the site's PTAL, its location in a sustainable well connected town centre location and being located near to a station, the overall level of parking provision would be considered acceptable, in accordance with policies T5, T6, and T6.1 of the London Plan.



You can click anywhere on the map to change the selected location.

PTAL output for Base Year

5

25-26 High St, Uxbridge UB8 1JN, UK

Easting: **505571**, Northing: **184078**

TfL PTAL map

Noise

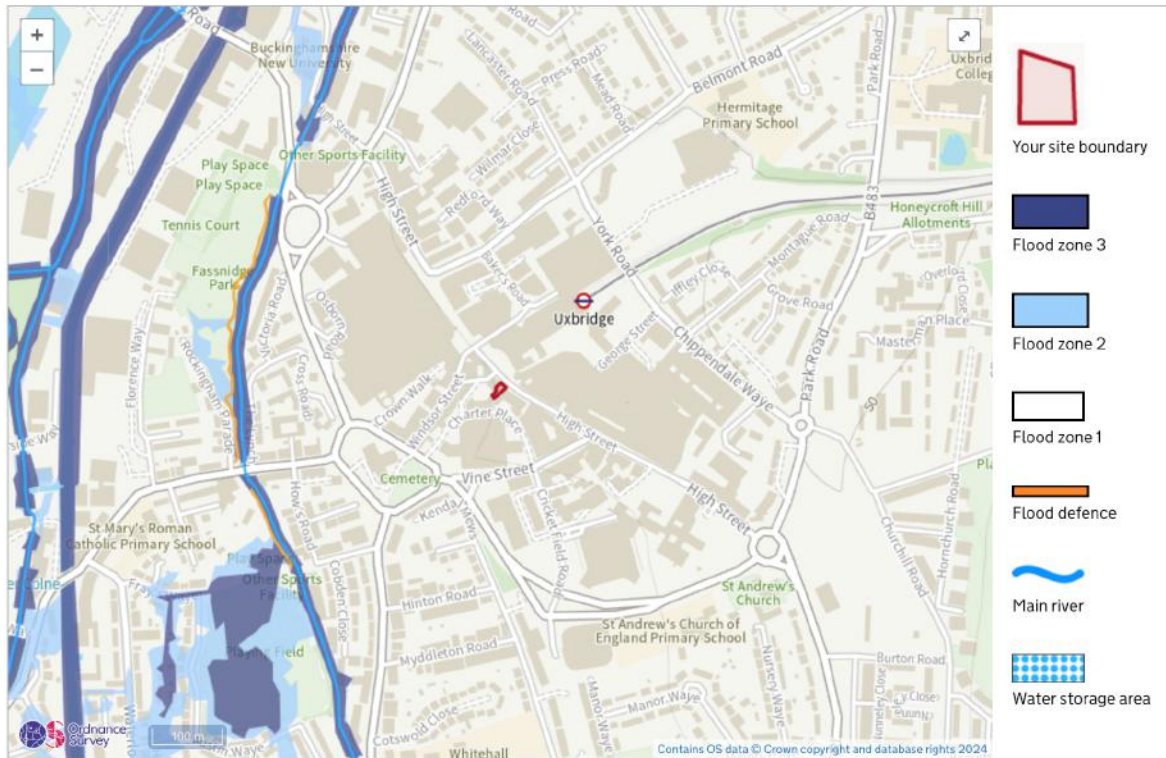
Policies D3, D13, and D14 of the London Plan refer to the need for new residential accommodation to offer appropriate amenity safeguarded from excessive noise exposure.

The proposed development is unlikely to impact neighbouring properties given its use and location.

However, in terms of safeguarding future residents from excessive noise, it is recognised that a condition should be imposed to ensure that the development would meet minimum internal noise standards. Subject to an appropriately worded condition, it is considered that the development could achieve an acceptable quality of internal noise protection that would safeguard future residents.

Flooding

The site is in flood zone 1 which is an area at least risk of flooding and the proposal will not increase the risk of flooding as no external changes are sought. As such, the proposal is considered to be resilient to flood risk, in accordance with policy GG6 of the London Plan.



EA Flood risk map

Conclusion

In conclusion, there is Local and London Plan support for making more efficient use of sustainable, underutilised vacant buildings for the delivery of residential accommodation, particularly where this safeguards the long term conservation of a listed building.

The proposal relates to a vacant upper floor premises to a building located centrally in Uxbridge town centre and it is a highly sustainable location.

The accompanying Commercial Office Availability & Leasing Report prepared by Rose Williams Commercial Property Consultant is considered to demonstrate that this empty office space is surplus to requirements and there is no realistic prospect of it being re-used as an office or alternative commercial use, particularly given the heritage constraints. Therefore, the proposed loss of office floorspace is considered acceptable in this case and its alternative use should be supported, in accordance with adopted planning policies.

The works are considered to result in a neutral impact on the character, appearance or historic interest and significance of this particular listed building and the Old Uxbridge/Windsor Street Conservation Area. This neutral impact should be considered alongside the considerable benefits of the proposal in bringing this building back into beneficial use after a period of vacancy and stem a number of condition issues that have been highlighted in the accompanying Heritage Statement, as well as see the original exterior features of the building receiving now regular maintenance it requires.

The proposal would be considered meet adopted policies with regards to heritage and visual amenity as the proposal would not lead to any harm visually or to the fabric of this listed building, or the setting of the surrounding conservation area.

The development would provide 3 spacious 2 bedroom flats that would be dual aspect and stacked on each floor, providing a good level of accommodation for future residents.

The location of the site is appropriate for this car free development that would encourage public transport and alternative green modes of transport.

Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of Council's Local Plan.

Appendix 1

Site Photos







































