

Report of the Head of Planning, Sport and Green Spaces

Address WOODBRIDGE HOUSE NEW WINDSOR STREET UXBRIDGE

Development: Application for the demolition of an existing Almshouse complex and the erection of 30 no. residential units (Use Class C3) (comprising 20 no. 1 bed replacement almshouse units, 2 no. 2 bed staff units and 8 no. 1 bed sheltered units), with office/meeting room, resident's cafe/social room, ancillary buildings and associated parking and landscaping.

LBH Ref Nos: 20590/APP/2016/1383

Drawing Nos: 447/TP/000
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Design and Access Statement April 2016
Planning Statement March 2016
Air Quality Statement

Date Plans Received: 07/04/2016 **Date(s) of Amendment(s):**
Date Application Valid: 20/04/2016

1. **SUMMARY**

The application proposes the demolition of existing almshouses and the construction of a new almshouse complex to provide 30 units, including 20 one bedroom flats, 2 No. 2 bedroom flats for live-on-site staff and an additional 8 No. 1 bed flats intended for open market rental (not for sale), to people aged 65 and over.

The existing building is locally listed and is considered to make a significant contribution to the character of the Rockingham Bridge Conservation Area within which it is located. The NPPF Para 126 advises that Heritage Assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

Para 132 advises that 'when considering the impact of a proposal on the significance of an asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through

alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification'.

The total demolition of Woodbridge House would lead to substantial harm to the significance of the buildings themselves and also to the Conservation Area. The National Planning Policy Framework (NPPF) is clear that in such circumstances, applications should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that all of the criteria noted in the NPPF (para 133) apply.

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

With regards to demonstrating 'the substantial public benefits that outweigh that harm or loss' the applicant has put forward a number of public benefits of the proposal, including; the existing units are inaccessible and not capable of adaptation, proposals will reduce energy usage and CO2 emissions, will increase sheltered housing provision and provides affordable housing, is financed without contribution from the public, addresses an identified deficit in elderly housing provision, contributes to the social fabric of Uxbridge and reduces inequality and discrimination in the existing accommodation offer.

The value of the stated public benefits has been considered against the loss of the Heritage Asset and, given the value of the Heritage Asset and the professional opinion of the Access Officer that the buildings could be adapted, the principle of the demolition of the existing locally listed building and replacement with the proposed development is considered to be unacceptable.

The application is therefore contrary to Policy BE4 and BE8 of the Hillingdon Local Plan (November 2012), Policy 7.8 of the London Plan (March 2016) and the NPPF.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The total loss of Woodbridge House, a locally listed building and non-designated heritage asset of considerable local significance, would be to the detriment of the historic character, identity and distinctiveness of the immediate area and cause substantial harm to the special architectural and historic character of the Rockingham Bridge Conservation Area. In these respects, the proposal would fail to meet the requirements of Paragraphs 132, 133 and 135 of the National Planning Policy Framework (NPPF), London Plan Policy 7.8 and Policies BE4 and BE8 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

2 NON2 Non Standard reason for refusal

The applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development (in respect of off-site sustainability contribution to a carbon fund). Given that a legal agreement to address this issue has not at this stage been offered or secured, the proposal is considered to be contrary to Policy R17 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and the London Borough of Hillingdon's

INFORMATIVES

1 I52 **Compulsory Informative (1)**

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 **Compulsory Informative (2)**

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (2015) and national guidance.

AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
BE12	Proposals for alternative use (to original historic use) of statutorily listed buildings
BE4	New development within or on the fringes of conservation areas
BE8	Planning applications for alteration or extension of listed buildings
BE13	New development must harmonise with the existing street scene.
BE18	Design considerations - pedestrian security and safety
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
H3	Loss and replacement of residential accommodation
H4	Mix of housing units
OE1	Protection of the character and amenities of surrounding properties and the local area
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
LPP 3.3	(2011) Increasing housing supply
LPP 3.4	(2011) Optimising housing potential
LPP 3.5	(2011) Quality and design of housing developments
LPP 3.8	(2011) Housing Choice

LPP 5.1	(2011) Climate Change Mitigation
LPP 5.3	(2015) Sustainable design and construction
LPP 5.12	(2015) Flood risk management
LPP 5.13	(2011) Sustainable drainage
LPP 5.15	(2015) Water use and supplies
LPP 7.1	(2015) Lifetime Neighbourhoods
LPP 7.2	(2011) An inclusive environment
LPP 7.4	(2011) Local character
LPP 7.8	(2015) Heritage assets and archaeology
LPP 7.9	(2015) Heritage-led regeneration
LPP 7.14	(2015) Improving air quality
LPP 8.2	(2015) Planning obligations
LPP 8.3	(2015) Community infrastructure levy
NPPF12	NPPF - Conserving & enhancing the historic environment

3 159 Councils Local Plan : Part 1 - Strategic Policies

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant saved policies (referred to as policies from the Hillingdon Unitary Development Plan - Saved Policies September 2007), then London Plan Policies (2015). On the 8th November 2012 Hillingdon's Full Council agreed the adoption of the Councils Local Plan: Part 1 - Strategic Policies. Appendix 5 of this explains which saved policies from the old Unitary Development (which was subject to a direction from Secretary of State in September 2007 agreeing that the policies were 'saved') still apply for development control decisions.

4

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the 'Saved' UDP 2007, Local Plan Part 1, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

3. CONSIDERATIONS

3.1 Site and Locality

The site is located to the north of, and accessed from, New Windsor Street approximately 400 metres west of Uxbridge Town Centre. It is in a secluded 'precinct-type' location, sitting behind buildings fronting New Windsor Street and behind buildings in the Lynch, to the west, and Lawn Road, Cross Road and Lynch Close to the north and east.

The site provides almshouse accommodation for elderly residents of Uxbridge. The existing two storey building on the site is 'U' shaped and sits around a central courtyard that is now utilised to predominantly provide 12 parking spaces and for vehicle turning, though some soft landscaping is present. The building, known as Woodbridge House, dates from 1905 and was designed by local architect William Eves. There have been additions to either end of the building (to provide staff accommodation and ancillary office provision) plus other additions such as a glazed 'cloister' to the front of building. To the north, east and west of the buildings are further areas of soft landscaping.

The site is owned and run by Uxbridge United Welfare Trust and information submitted within the application states that the Trust has provided almshouses for the community of Uxbridge since the 1720s. The Trust's Mission Statement is given as:

'The Trust maintains and improves the living conditions of the community within the almshouses, and maximises the assistance available to those in need within the area of benefit'.

The site has a Public Transport Accessibility Level (PTAL) of 4 and sits within the Rockingham Bridge Conservation Area, with the building itself locally listed. The site is also within an Archaeological Priority Area, an Air Quality Management Area and is within the Developed Area, as designated within the Hillingdon Local Plan (November 2012).

3.2 Proposed Scheme

The application proposes the demolition of the existing almshouses and other buildings on the site (20 existing almshouse bed-sit units, 2 No. 2 bed flats and a 3 bedroom house) and the construction of a new almshouse complex to provide 30 units, including 20 one bedroom flats, 2 No. 2 bedroom flats for live-on-site staff and, in order to finance the modernisation of the almshouse stock, an additional 8 No. 1 bed flats intended for open market rental (not for sale), to people aged 65 and over. These units would also be part of the sheltered, warden controlled environment. Also proposed are an ancillary staff office (to include kitchen, store and meeting room) plus a communal social room/cafe with kitchen for the residents.

The buildings proposed are three storeys in height, with a section of two storey height in the north west corner. Rather than provide internal corridors the scheme incorporates external sheltered circulation routes, predominately to the rear. A 'Cloister' is proposed at ground floor level that spans the front of the 'u' shaped layout and incorporates a 'gate house' entrance. Within this space the internal courtyard will be redesigned to create an external partially soft and partially hard landscaped area for use by residents.

8 parking spaces and a buggy/bike store are proposed to the west of the site adjacent to properties on The Lynch. Parking is proposed as staff/visitor parking and incorporates 2 disabled parking bays and 1 electric vehicle charging point. To the north of the buildings an area of soft landscaping is proposed plus a plant and store room. To the east of the site a private resident's garden is proposed with further soft landscaping.

3.3 Relevant Planning History

Comment on Relevant Planning History

The site has been subject to a small number of previous planning applications for minor extensions.

4. Planning Policies and Standards

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)

London Plan (March 2016)

National Planning Policy Framework

Hillingdon Supplementary Planning Document - Accessible Hillingdon

Hillingdon Supplementary Planning Document - Noise

Hillingdon Supplementary Planning Guidance - Air Quality

Hillingdon Supplementary Planning Guidance - Community Safety by Design

Hillingdon Supplementary Planning Guidance - Land Contamination

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1 (2012) Built Environment

Part 2 Policies:

AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
BE12	Proposals for alternative use (to original historic use) of statutorily listed buildings
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- NPPF12 NPPF - Conserving & enhancing the historic environment

5. Advertisement and Site Notice

- 5.1** Advertisement Expiry Date:- **25th May 2016**
- 5.2** Site Notice Expiry Date:- Not applicable

16th May 2016

6. Consultations

External Consultees

Consultation letters were sent to circa 130 local owner/occupiers and site notices were also posted. 2 petitions have been received, one in support of the application and one objecting to the development. In addition 16 letters of objection have been submitted against the proposals.

PETITION IN SUPPORT

The petition in support of the proposals (76 signatures) states:

'We the undersigned as local residents of the London Borough of Hillingdon petition the council to approve the planning applications to replace the outdated, tired and uneconomical Woodbridge House with modern almshouses and apartments that offer life time homes standards and step free access for all.'

PETITION OF OBJECTION

The petition of objection to the proposals (21 signatures) states:

'We the undersigned petition Hillingdon Council to reject the planning permission to demolish to current Woodbridge House Almshouses. We believe that the application undervalues the contribution that Woodbridge House makes to the Rockingham Bridge Conservation Area and the degree of harm that will be suffered if it is lost.'

Woodbridge House was built in 1908 in a garden suburb style with its port hole windows and decorative chimneys. It was designated as a 'locally listed' building by Hillingdon Council within the Rockingham Bridge Conservation Area. We don't believe this should be lost.'

LETTERS OF OBJECTION

The 16 letters of objection to the proposals can be summarised to cover the following points:

- Detrimental impact on the character of the area
- Loss of a outlook/visual amenity
- Almshouses contribute to the heritage/history of the area and should be retained
- Existing buildings are of high quality
- Damage to architectural legacy
- Loss of daylight
- Loss of privacy
- Insufficient parking and increase in parking stress
- Impact on highway safety
- Increase in noise
- Detrimental impact on residential amenity
- Heritage Statement undervalues contribution Woodbridge House makes to Conservation Area
- Existing building compliments area and proposal will not
- Benefits of new scheme do not outweigh harm should building be lost
- Existing buildings remain viable
- Unsympathetic design
- Inappropriate materials
- More than 8 units will be private rentals
- Increased risk of flooding
- Loss of security
- CGIs are incorrect and deceiving
- Renovation of existing roof space should be investigated further
- Detrimental impact on wildlife (bats)

- Detrimental impact on amenity during construction
- Level of care is lower than stated and therefore staff accommodation is not required
- Insufficient detail on transitional arrangements
- Numerous existing residents with mobility issues and no evidence of difficulties
- No evidence that accommodation for elderly couples is required
- Damage to adjacent buildings
- Air pollution
- Detrimental impact on property values
- Stress causation to pets
- Health and safety during construction
- Who will police parking during construction
- Alternative sites should be further investigated

UXBRIDGE LOCAL HISTORY AND ARCHIVES SOCIETY

The members of this Society would be saddened to see the demolition of this listed building, since it is of impressive appearance and was designed by William Lionel Eaves, an Uxbridge Architect. We hope that it can be adapted for continued use.

If this is found impossible, then we request that a full photographic record of the site be made, and deposited in the Borough Archives in Uxbridge Central Library.

NATIONAL AIR TRAFFIC SERVICES (NATS)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly NATS has no safeguarding objection to the proposal.

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (GLAAS)

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development.

Appraisal of this planning application using the Greater London Historic Environment Record and information submitted with the application indicates a need for further information to reach an informed judgement of its impact on heritage assets of archaeological interest.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: Uxbridge; Colne Valley.

In pre-application consultation I advised the applicant to submit a desk-based assessment in support of this application because the proposed development lies on the edge of both the Colne Valley Archaeological Priority Zone and the Uxbridge Archaeological Priority Area. The latter relates to the medieval and postmedieval town which was focused along the High Street but by 1754 (Rocque's map) included a road running down to the river and buildings in this general area.

This part of the Colne Valley is also well known for important late glacial and early post-glacial hunter-gatherer occupation sites and associated palae-environmental remains. Well preserved sites of this period are rare and likely to be of national importance. This site lies close to the boundary between the alluvial river floodplain and the terrace gravel which could be a favoured topographical location for early prehistoric settlement, although the existing development will presumably have caused some disturbance. Unfortunately, the applicant has chosen not to take this advice and has submitted a heritage statement which explicitly does not consider buried archaeology. I am therefore unable to recommend a favourable determination of this application at the present time.

I therefore recommend that the following further studies should be undertaken to inform the preparation of proposals and accompany a planning application:

Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures. The report should focus on the issues identified above, and in particular create a geo-archaeological deposit model to assess whether there is potential for in-situ survival of early prehistoric remains. Depending upon the results there may be a need for field evaluation test pits or trenches to inform the planning decision.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development. Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS.

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is no feasible archaeological investigation prior to development. If a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal. Further information on archaeology and planning in Greater London is available on the Historic England website. Please note that this advice relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

Case Officer's Comments:

Should the application be recommended for approval then a condition could be added to require the study/assessment requested by GLAAS. As such the lack of such an assessment is not deemed sufficient to warrant a reason for refusal of the proposal.

Internal Consultees

A request has been received from a Ward Councillor that this application be presented to the Major Applications Planning Committee.

FLOOD AND WATER MANAGEMENT OFFICER

The site appears to currently discharge to soakaways, any new proposal for this site would need to confirm the adequacy of these systems and ensure that their design meets current standards for controlling water on site.

Therefore the following condition is requested:

Prior to commencement, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it:

Manages Water

The scheme shall demonstrate ways of controlling the surface water on site by providing information on:

a) Suds features:

- i. incorporating sustainable urban drainage in accordance with the hierarchy set out in Policy 5.15 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided,
- ii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus Climate change,
- iii. overland flooding should be mapped, both designed and exceedance routes above the 100, plus climate change, including flow paths depths and velocities identified as well as any hazards, (safe access and egress must be demonstrated).

b) Receptors

- i. Capacity demonstrated for Thames Water foul and surface water network, and provide confirmation of any upgrade work required having been implemented and receiving watercourse as appropriate.
- ii. Where infiltration techniques (soakaway) or a basement are proposed a site investigation must be provided to establish the level of groundwater on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).
- iii. Where groundwater is found within the site and a basement is proposed suitable mitigation methods must be provided to ensure the risk to others is not increased.
- iv. identify vulnerable receptors, ie WFD status and prevent pollution of the receiving groundwater and/or surface waters through appropriate methods;

c) Minimise water use. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:

- i. incorporate water saving measures and equipment.
- ii. provide details of water collection facilities to capture excess rainwater;
- iii. provide details of how rain and grey water will be recycled and reused in the development.

d) Long Term Management and Maintenance of the drainage system.

- i. Provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification, remediation and timescales for the resolving of issues. Where there is overland flooding proposed, the plan should include the appropriate actions to ensure the safety of the users of the site should that be required.
- ii. Where the maintenance will not be the responsibility of an individual householder, the details of the body legally responsible for the implementation of the management and maintenance plan must be provided.

f) During Construction

- i. How temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

Reason

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) Policy 5.12 Flood Risk Management of the London Plan (July 2011) and National Planning Policy Framework (March 2012) and the Planning Practice Guidance (March 2014). To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2015), and conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2015).

WASTE SERVICES

The proposed scheme provides sufficient space for the refuse and recycling requirements. As such Waste Services has no objection to the proposals.

S106 OFFICER

Heads of Terms

1. Highway Works: S278/S38 for required Highways Works subject to surrounding network adoption status
2. Construction Training: A financial contribution to the sum of: Training costs: £2500 per £1m build cost plus Coordinator Costs - £9,600 per phase or an in kind scheme to be provided.
3. Air Quality Monitoring: A financial contribution to the sum of £25,000 subject to comments from LBH air quality specialists.
4. Travel Plan to include £20,000 Bond
5. Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions

Case Officer comment's:

The proposed Heads of Terms have been discussed with the applicant and the Council's S106 Officer. Given that there are no S278/S38 works, Air Quality Monitoring or Travel Plan required for the development it is considered that these Heads of Terms are not relevant or appropriate. Also with regards to the Trust's charitable status the Construction Training and Project Management and Monitoring fee are deemed overly burdensome. The Council's Sustainability Officer has however requested an off-site contribution of £8,856, which is deemed appropriate and would be an agreed Heads of Term should the application be recommended for approval.

CONSERVATION AND DESIGN

a. The Existing Building

Woodbridge House was built in 1906 by the celebrated local architect, William Eves, for the Uxbridge United Charities. It is a two storey, U shaped building, arranged around a central courtyard. It was designed in the style of 'workers' cottages', each ground floor flat being handed, the paired front doors having an external door between, leading to the first floor flats above, though with some slight modification to this at the corners.

In external appearance, Woodbridge House has many similarities with the cottages built (a few years later) by Parker and Unwin at Hampstead Garden Suburb. Very much in the style of vernacular cottages, Woodbridge House has features such as steep roofs, dominant and ornate chimney stacks, the pairing of dormers which break the eaves line, open eaves, applied timber framing in the gables, ornate brick banding, runs of three side-hung casements, the use of 'oculi', the finishing of upper walls in whitewashed roughcast with the lower in brick, and the arrangement around planned open spaces.

The original plans and elevations demonstrate that much of the external appearance of the front of the building, together with its general layout, have survived intact, a tribute to its being used as almshouses for over a century. Woodbridge House also appears to be in good condition, having been well maintained over the years.

Although acknowledged as not being quite statutorily listable (neither are the cottages at Hampstead Garden Suburb), Woodbridge House is considered to be a very good locally listed building, which makes a positive contribution to the special architectural and historic interest of the Rockingham Bridge Conservation Area.

Rockingham Bridge Conservation Area was designated three years ago, in December 2012. At the time of designation, a leaflet was published with a Statement of Significance. This states that the Conservation Area is characterised by good quality, tightly developed 19th century two storey workers' terraces, that it has an urban character, softened by green spaces and modest plot sizes. Woodbridge House though a little later in date, is nevertheless very much consistent with this character.

The Statement picks out for particular mention: Rockingham Bridge, Union Villas, Woodbridge House and Fassnidge Park. Woodbridge House is the single, most important building in the Conservation Area, and the only one to be locally listed. It is thus a very important contributor to the special architectural character of the Conservation Area.

b. The Proposed Building

Without prejudice to the above, the replacement buildings have been assessed for their architectural merit, and ability to integrate with the character and context of the Conservation Area.

The buildings are three storeys, rather than two as now, and have been arranged around a smaller courtyard, each side being linked by a service core and cloister. There are outward facing walkways linking the flats on the second floor: a difficult plan to reconcile successfully with the traditional roofscapes in the Conservation Area. The development would certainly be visible from the wider area and the spaces within and around the buildings would be impacted by the extra storey height and reduced courtyard.

However the pre-application comments have been taken on board and the overall design now exhibits a much clearer vertical emphasis and cohesion of architectural elements, roof line and materials. Remaining concerns relate to the degree of dominance of the second storey windows in the courtyard and the heavy impact of the second storey walkways (on both the garden side and the Fassnidge Park side) on the roofscape of the external elevations. Also, whilst understanding the thinking behind the palette of browns and greys, there is a concern that such a large group of buildings might appear very dark overall.

c. Policy

The Rockingham Bridge Conservation Area is a designated Heritage Asset and Woodbridge House, through its local listing, has been identified as a Heritage Asset in its own right. It has also been highlighted in the Council's 'Statement of Significance' as making a positive contribution to the special architectural and historic character of that Conservation Area.

The NPPF (Para 126) advises that Heritage Assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Conservation is defined as 'maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances' its significance.' (Appendix 2)

Para 132 advises that 'when considering the impact of a proposal on the significance of an asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification'.

The total demolition of Woodbridge House would lead to substantial harm to the significance of the buildings themselves and also to the Conservation Area. The NPPF is clear that in such circumstances, applications should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that all of the criteria noted in the NPPF (para 133) apply.

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

Conclusions:

Woodbridge House is a locally listed building of some quality, which makes a positive contribution to the character of Rockingham Bridge Conservation Area. It has been well maintained and appears to be in good condition. It is understood that it is fully occupied. The Access Officer has suggested some alterations to the ground floor to make it more accessible. Moreover, potential alterations/additions at the rear, to increase the floor area of some at least of the flats, have been discussed with the applicants.

It is considered that the significance of Woodbridge House is such that its demolition would be a great loss, not only in itself, but to the character of the Conservation Area. In weighing the scale of the loss (total) with the significance of the building (sizeable), the argument for retaining the building is very strong.

Recommendation: Unacceptable

ACCESS

In assessing this application, reference is made to the National Planning Policy Framework [NPPF]: conserving and enhancing the historic environment, Easy Access to Historic Buildings (Historic England, June 2015), and the Equality Act 2010.

The existing Almshouse complex was built in circa 1906, and Woodbridge House is understood to be a locally listed building. NPPF, paragraph 133, 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 loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

In view of the Uxbridge United Welfare Trust's aspirations to improve accessibility, I visited during October 2015 to carry out an assessment. The existing courtyard is block paved and provides some 12 parking spaces. The route from the car park to the external walkway, which leads to the ground and first floor flats, is essentially level. The threshold and water bar leading from outside into the external walkway does however exceed a height difference of 15 mm, resulting in an undesirable level difference between the external paved area and internal floor. The walkway floor has a crossfall gradient in excess of 1:60. However, it is considered that these two design issues could be remedied without too much disruption or cost.

Gaining access into the ground floor flats is via a 150-180 mm step up. The external walkway could be gently graded (1:21) to eliminate the single step leading to the flats. The door widths leading to and into the flats are, at 790 mm, considered to be acceptable. The front door to the flat visited led directly into a good-sized bedsit, and the accommodation benefits from a separate shower room and kitchen. The bathroom visited measures 4.16 m² and achieves an effective door opening width of 640 mm. The space has potential to achieve a level access showering area of 1200 x 1200 mm directly opposite the door opening. The toilet pan could be positioned adjacent to this area, with a half pedestal hand basin on the return wall in front of the toilet. The cupboard space could be relocated to the area where the toilet pan is currently positioned. To allow wheelchair access, the bathroom door would need to be widened to achieve a clear opening of no less than 800 mm.

I accept that the existing Almshouse accommodation, and particularly the first floor flats, could never be fully accessible to older and disabled people with more complex care support needs. However,

the primary function of the UUWT, I believe, is to provide residence for older persons, who find themselves impoverished and distressed. I also consider that persons with more complex support needs would meet the criteria for Social Care, and in all probability would be provided with accommodation where their mobility and/or care support needs could be fully met. Whilst the provision of modern, fully accessible accommodation would ordinarily be welcomed, I am of the professional view that accessibility improvements to the ground floor accommodation are possible, without harming the heritage asset, and thus allowing those who have an age-related mobility impairment to avail themselves of the charitable services offered by UUWT.

Should the council be minded to approve the application, it should be noted that page 67 of the Design & Access Statement refers to the Lifetime Home Standards and Category M4(1), as one and the same, which is not the case. In accordance with London Plan Policy 3.8, any approved redevelopment of the site would be subject to compliance with the Housing Technical Standards, which came into effect on 1st October 2015. To this end, 10% of the proposed residential units should meet the standards for M4(3) Category 3 - Wheelchair User Dwellings, with all remaining units designed to the standards for M4(2) Category 2 - Accessible and Adaptable Dwellings, as set out in Approved Document M to the Building Regulations (2010), 2015 edition.

The submitted drawings lack the necessary detail to determine whether the technical standards referred to above could be successfully incorporated into the proposed flat layouts.

Conclusion: unacceptable.

1. Accessibility improvements could be made to allow reasonable use of the site for persons with impaired mobility.
2. To support any approval, revised floor plans of at least 1:100 should be requested as a prerequisite to any planning approval. These should include furnished planned layouts, which clearly demonstrate the access zones and other accessibility provisions set out in Approved Document M for the required M4(2) and M4(3) housing types.

LANDSCAPE ARCHITECT

Tree Preservation Order (TPO)/Conservation Area: This site is within Rockingham Bridge Conservation Area.

Significant trees / other vegetation of merit in terms of Saved Policy BE38: There are several trees on and adjacent to this site. Most of the trees appear to be far enough away from the proposals to be unaffected (directly); however, the trees could be indirectly affected by construction-related activities / storage of materials etc.

Scope for new planting: This matter can be dealt with by condition.

Recommendations: In order to show that this scheme makes adequate provision for the protection and long-term retention of valuable tree/s, the following detail is required (in accordance with BS 5837:2012):

A Tree Survey to categorize the trees on and off site;

An Arboricultural Impact Assessment showing existing and proposed levels (any proposed changes in levels must be clearly defined and shown in colour on the plans)

ALL existing and proposed drainage must be shown

A Tree Protection Plan to show how the trees (to be retained) will be protected during development;.

An Arboricultural Method Statement to show any incursion into tree root protection areas (RPA's) will

be addressed.

Details of how the tree protection measures will be assessed before demolition / construction starts and how the tree protection (and any procedures described within approved arboricultural method statements) will be supervised during construction.

A landscape scheme should also be submitted and any new tree planting specifics should be provided and must conform to BS 8545:2014.

Conclusion (in terms of Saved Policy BE38): Acceptable subject to conditions to RES8, RES9 and RES10.

HOUSING

Any new residential development on the site of over 10 units will be expected to provide 35% affordable housing.

Case Officers comments:

The proposed development incorporates 20 almshouses that the applicant has confirmed via email of the 12/07/16 will be available at 80% or less of market rate, therefore qualifying as affordable housing.

HIGHWAYS

I have considered the above application and have the following comments:

The site is located off New Windsor Street (A4007) which is a classified road. The site is on the edge of the Uxbridge Controlled Parking Zone.

The site has a PTAL value of 4 (good), which is a result of the proximity of local bus services and the 700+m walk from Uxbridge Station.

The site has a private vehicular and pedestrian access off New Windsor Street.

The site has approximately 12 car parking spaces available off the New Windsor Street access under the current arrangements

The proposals include the demolition of the existing 20 bedsit/studio almhouse facility and replacing it with 20 bedsit/studio flats+2x2bed staff flats and 8 sheltered housing flats.

The existing access is being re-used as part of the proposed development.

8 car parking spaces are proposed along with mobility scooter parking and EV charging point and a car parking management plan.

There is sufficient room within the development to provide the proposed car parking spaces and for vehicles to enter and leave the site in a forward direction.

On the basis of the above comments no highway objections are raised.

SUSTAINABILITY

I have no objections to the proposed development subject to the following:

The energy strategy (Woodbridge House, Uxbridge, February 2016) shows that the development does not achieve the required 35% reduction in CO2 from 2013 Building Regulations. The development is short of its target by 4.92tCO2/annum. Consequently, the development is not policy compliant. However, the attempts made to make the development compliant have been robust and are acceptable in principle. Policy 5.2E of the London Plan allows for offsite solutions where there is a shortfall in the target onsite.

The contribution is calculated using the 'Greater London Authority guidance on preparing energy assessments' (April 2015). This sets a contribution value of £60/carbon tonne/annum for 30years.

In this instance, the development would be compliant with Policy 5.2 subject to the following

condition and a contribution of £8,856 (4.92CO₂ x £60 x 30years).

Condition

Prior to the commencement of development, full details of the PVs required to meet the CO₂ reductions set out in the energy strategy shall be submitted to and approved in writing by the Local Planning Authority. The details shall be the specifications of the PVs selected, as well as roof plans and elevations showing the PVs. The development must proceed in accordance with the approved plans and details.

Reason

To ensure the development reaches the carbon reduction targets set out in the London Plan.

ENVIRONMENTAL PROTECTION UNIT

With reference to this planning application I have no objections subject to the following conditions respectively:

Air extraction system noise and odour

No air extraction system shall be used on the premises until a scheme for the control of noise and odour emanating from the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include such combination of measures as may be approved by the LPA. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

REASON: To safeguard the amenity of the occupants of surrounding properties in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

Noise affecting residential property

The rating level of noise emitted from the plant and/or machinery hereby approved shall be at least 5 dB below the existing background noise level. The noise levels shall be determined at the nearest residential property. The measurements and assessment shall be made in accordance with British Standard 4142 "Method for rating industrial noise affecting mixed residential and industrial areas".

REASON: To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

Construction environmental management plan

Before the development hereby approved commences, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority. The CEMP shall comprise such combination of measures for controlling the effects of demolition, construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including the phasing of the works, hours of work, noise and vibration, air quality, waste management, site remediation, plant and equipment, site transportation and traffic management including routing, signage, permitted hours for construction traffic and construction materials deliveries. It will ensure appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. All demolition, construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA.

Reason: To safeguard the amenity of surrounding areas in accordance with policy OE5 of the Hillingdon Unitary Development Plan.

AIR QUALITY

The applicant has addressed how any potential impacts of the development will be controlled during both construction and operation. I can confirm that I have no air quality objections to the development provided appropriate conditions are attached. Please see below for consideration:

None of the development hereby permitted shall be commenced until an Air Quality Management Strategy has been submitted to and approved in writing by the Local Planning Authority. The approved strategy shall then be implemented as soon as the scheme hereby permitted is brought into use and the strategy shall remain in place thereafter, unless otherwise agreed in writing by the Local Planning Authority.

The strategy shall incorporate as minimum the following components:

- a) The demolition and construction of the proposed development to be carried out as detailed in the requirements introduced by the Mayor of London, SPG, 'The control of dust and emissions during construction and demolition;
- b) Compliance with the requirements listed in the London's Low Emission Zone for non-road mobile machinery. From 1 September 2015 NRMM of net power between 37kW and 560kW used in London will be required to meet the standards set out below. This will apply to both variable and constant speed engines for both NOx and PM. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments. All Non-Road Mobile Machinery (NRMM) All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance.

Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority.

The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>.

- c) Mechanical ventilation including NOx/NO2 filtration is included for all habitable rooms in the residential units across the ground and 1st floors. The filtration system shall secure compliance with the EU Directive 2008/50/EC (the CAFE Directive) European Union Air Quality and the inlet positioned away from major traffic sources. This will provide a supply of clean air to rooms affected by any high pollution levels. Natural ventilation is only permitted for rooms located second floor level or above with inlets positioned at this level or above and away from major traffic sources to ensure the supply of clean air. The height at which this may occur may need to be estimated by detailed modelling to accommodate any on-site energy emissions.

- d) Compliance with the specification of the energy production unit as efficient ultra-low NOx gas boilers;

REASON

In order to protect residents from poor air quality and safeguard human health in compliance with policy 5.3 of the London Plan (2015); paragraph 124 of the NPPF, policy 7.14 of the London Plan.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Paragraph 17 of the National Planning Policy Framework states that one of the core principles of the document is the "effective use of land by reusing land that has been previously developed (brownfield land)."

Policy H3 of the Hillingdon Local Plan states that the loss of residential accommodation will only be permitted if it is replaced within the boundary of the site. An increase in residential accommodation will be sought.

The development proposes the demolition of the existing staff accommodation and studio units and the erection of 30 units to include one bedroom flats plus staff accommodation. The development in use class terms is considered an acceptable use on a brownfield site and would represent an increase in residential accommodation, in accordance with Policy H3 of the Hillingdon Local Plan (November 2012). The site is currently in residential use and therefore the principle of residential use on the site is already established.

However Policy BE4 of the Hillingdon Local Plan (November 2012) states that there will be a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area and Policy 7.8 of the London Plan (March 2015) states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

The Rockingham Bridge Conservation Area is a designated Heritage Asset and Woodbridge House, through its local listing, has been identified as a Heritage Asset in its own right. It has also been highlighted in the Council's 'Statement of Significance' as making a positive contribution to the special architectural and historic character of that Conservation Area.

Having reviewed the proposals and the submitted Heritage Statement it is considered that there is insufficient justification for the demolition of the existing heritage asset. The applicant's main argument for the demolition of the building is that it is no longer fit for purpose as it is not sufficiently accessible and could not be adapted to achieve this. However the Council's Access Officer has visited the site and is of the view that the buildings could be adapted to reach an acceptable degree of accessibility for residents.

The NPPF Para 126 advises that Heritage Assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

Para 132 advises that 'when considering the impact of a proposal on the significance of an asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification'.

The total demolition of Woodbridge House would lead to substantial harm to the significance of the buildings themselves and also to the Conservation Area. The NPPF is clear that in such circumstances, applications should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that all of the criteria noted in the NPPF (para 133) apply.

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

With regards to demonstrating 'that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss' the applicant has put forward the following arguments:

1. The proposal replaces units that are cramped and inaccessible to older, less mobile users and not capable of improvement through demonstrably viable adaptation, with highly specified, accessible units.
2. It performs an environmental role in reducing energy usage and CO2 emissions, through good design, improved building fabric and energy generation on-site.
3. It increases sheltered housing provision in a location determined by LP and Borough planning policies to be highly desirable for such uses, avoiding isolation and social exclusion.
4. It provides 67% of units within the scheme at a recognised level of 'affordability'.
5. It is financed without contribution from the public purse and directly supports the Local Authority's Housing Department in providing accommodation for the elderly.
6. It addresses an identified and increasing deficit in specialist elderly housing provision in both the Borough and London-wide.
7. It enables The Trust to maintain a use on this site that contributes importantly to the social fabric of Uxbridge.
8. It enables The Trust to reduce present inequality and discrimination in the accommodation offers it is able to make.

The value of the stated public benefits has been considered against the loss of the Heritage Asset. There would be no net increase in the number of affordable units as a result of the development. The reduction in CO2 emissions is limited and not even policy compliant. The slight increase in units is not of the magnitude it could be given substantial weighting. The existing complex of 20 units seems to be very popular and is already successfully addressing exclusion and contributing to the social fabric of Uxbridge. The Council's Access Officer has visited the site and concluded that the existing building could be amended to create accessible units, all be it on the ground floor only.

In summary, although the eight public benefits the applicant says apply are all laudable, none could be given substantial weighting. Given the substantial value of the Heritage Asset, the remaining stated public benefits are not deemed to outweigh the harm caused by the loss of the existing building. The principle of the demolition of the existing locally listed building and replacement with the proposed development is therefore considered to be unacceptable.

The application is therefore contrary to Policy BE4 of the Hillingdon Local Plan (November 2012), Policy 7.8 of the London Plan (March 2016) and the NPPF.

7.02 Density of the proposed development

The application site has an area of 2,725 sq.m which equates to 0.275 hectares, and the proposed development is for 30 units. This results in a proposed density of approximately 110 units per hectare.

In terms of habitable rooms the 28 No. 1 bed units have a kitchen/diner/living room space of 27 sq.m approximately, plus a bedroom. This equates to 3 habitable rooms each = 84 habitable rooms.

The 2 No. 2 bed units (staff) have 4 habitable rooms each = 8 habitable rooms.

Total proposed habitable rooms is therefore 92 and results in 340 Hr/Ha.

The London Plan's 'Sustainable Residential Quality Matrix' is used to determine the acceptability of density for proposed new development. For an application site with a PTAL

(Public Transport Accessibility Level) of 4 in an urban setting (predominantly dense development, terraced houses, between 2 and 4 storeys, within 800 metres of a District Centre) the indicative densities by PTAL and setting are 200-700 Hr/Ha and for smaller unit sizes (2.7-3.0 Hr/Ha) = 70-260 Units/Ha.

The proposed development therefore accords with the density ranges deemed appropriate with the London Plan (March 2016) and the Mayor's Housing SPG. It is worth noting that the densities are within the lower range of the threshold, however given the setting of the site within a conservation area the quantum of development is deemed appropriate.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

The Uxbridge Local History Society have raised an objection to the demolition of the locally listed building stating that 'it is of impressive appearance and was designed by William Lionel Eaves, an Uxbridge Architect. We hope that it can be adapted for continued use.'

The Council's Head of Conservation has carefully considered the proposed development and provided detailed comments on the application. The proposals can be considered in two parts, firstly the demolition of the existing building and secondly the proposed new development.

Loss of the Existing Building:

Woodbridge House was built in 1906 by the celebrated local architect, William Eves, for the Uxbridge United Charities. Although it is acknowledged as not being quite statutorily listable, Woodbridge House is considered to be a very good locally listed building, which makes a positive contribution to the special architectural and historic interest of the Rockingham Bridge Conservation Area. Woodbridge House is considered the single, most important building in the Conservation Area, and the only one to be locally listed. It is thus a very important contributor to the special architectural character of the Conservation Area.

As set out in section 7.01 of this report it is considered that the significance of Woodbridge House is such that its demolition would be a great loss, not only in itself, but to the character of the Conservation Area. The application is therefore contrary to Policy BE4 of the Hillingdon Local Plan (November 2012) and Policy 7.8 of the London Plan (March 2016).

The Proposed Building:

The buildings are three storeys, rather than two as now, and have been arranged around a smaller courtyard, each side being linked by a service core and cloister. There are outward facing walkways linking the flats on the second floor: a difficult plan to reconcile successfully with the traditional roofscapes in the Conservation Area. The development would certainly be visible from the wider area and the spaces within and around the buildings would be impacted by the extra storey height and reduced courtyard. However the pre-application comments have been taken on board and the overall design now exhibits a much clearer vertical emphasis and cohesion of architectural elements, roof line and materials. Remaining concerns relate to the degree of dominance of the second storey windows in the courtyard and the heavy impact of the second storey walkways (on both the garden side and the Fassnidge Park side) on the roofscape of the external elevations. Also, there is a concern that such a large group of buildings might appear very dark overall.

Conclusions:

Whilst some concerns are raised with the design of the new proposals and their subsequent impact on the Conservation area, they are not deemed sufficient to warrant a recommendation of refusal of the application. However it is considered that the significance

of Woodbridge House is such that its demolition would be a great loss to the character of the Conservation Area and the this loss is deemed sufficient to warrant a recommendation for refusal of the application due to this detrimental impact.

ARCHAEOLOGY

The proposed development lies on the edge of both the Colne Valley Archaeological Priority Zone and the Uxbridge Archaeological Priority Area.

The Greater London Archaeology Advisory Service was consulted as part of the application process and has reviewed the site and development proposals. They have raised an objection to the proposals based on the lack of a desk-based assessment of the site. Such an assessment was requested from the applicant however one has not been provided. Whilst the requirement of a desk-based assessment is deemed appropriate given the potential archaeological value of the site, the lack of an assessment is not deemed sufficient to warrant a recommendation of refusal of the application as such an assessment could be required by an appropriately worded planning condition should the application be approved.

7.04 Airport safeguarding

The National Air Traffic Services have been consulted as part of the application process and have raised no objections to the development proposed.

7.05 Impact on the green belt

The application site is within a developed area and is not within close proximity of the green belt.

7.07 Impact on the character & appearance of the area

The impact of the proposals on the character of the area, and in particular the Rockingham Bridge Conservation Area, are discussed above in section 7.03 of this report. It is concluded that the proposals would have an unacceptable impact on the character and appearance of the area and is therefore recommended for refusal. The proposal therefore fails to be in accordance with Policies BE13 & BE19 of the Hillingdon Local Plan (November 2012).

7.08 Impact on neighbours

With the exception of small elements of circulation space and new single storey outbuildings, the proposed new development will sit within the footprint of the existing Woodbridge House buildings and will therefore be no closer to neighbouring residential properties than as currently exists on site. However the development will replace a two storey building with a new development that is three stories in height. The impact of the additional storey on the privacy and amenity of adjacent occupiers is an important consideration as to the acceptability of the proposed development.

In terms of loss of privacy one of the main concerns with the new development is the potential for overlooking from the external sheltered walkways or 'cloisters'. This concern was raised at pre-application stage and some efforts have been made to amend the design to reduce the possibility of overlooking occurring. Particular concerns were raised with regard to the proximity of the first and second floor walkways and properties to the west on The Lynch. The proposals have been amended to incorporate glazed sections on these floors rather than sections which remain open. The proposed elevation plans indicate that 'All first floor and second floor windows in this elevation in opaque glass'. It is considered that should the application be recommended for approval a condition is attached to any consent that confirms the requirement for these windows to be fixed shut and obscure glazed. Subject to the attachment of this condition the impact of the proposal on the privacy

of the neighbouring properties is considered to be acceptable.

The proposal incorporates a mansard roof to reduce the scale of the building from a traditional three storey design. However it will still raise the ridge height from approximately 8m above ground level to 11m in height. The applicant has submitted a Shadow Analysis and Daylight Study as part of the planning application. These studies conclude that whilst there will be some impact caused by the proposed new buildings, this impact will not be sufficiently detrimental to the amenity of adjacent occupiers to warrant a recommendation of refusal of the scheme. The Council's Environmental Protection Unit have reviewed the details submitted and raised no objection to the development subject to the attachment of conditions requiring the protection of neighbouring residential properties from unacceptable noise disturbance. These conditions would therefore be recommended to be attached to any approval of the application in order to protect residential amenity.

7.09 Living conditions for future occupiers

INTERNAL FLOOR AREA

The proposed development is for the creation of 30 units within the site. Each of the dwellings would be erected in accordance with the floor space standards contained within Policy 3.5 of the London Plan (March 2016). However should the council be minded to approve the application, it should be noted that page 67 of the Design & Access Statement refers to the Lifetime Home Standards and Category M4(1), as one and the same, which is not the case. As the Council's Access Officer has advised, in accordance with London Plan Policy 3.8, any approved redevelopment of the site would be subject to compliance with the Housing Technical Standards, which came into effect on 1st October 2015. To this end, 10% of the proposed residential units should meet the standards for M4(3) Category 3 - Wheelchair User Dwellings, with all remaining units designed to the standards for M4(2) Category 2 - Accessible and Adaptable Dwellings, as set out in Approved Document M to the Building Regulations (2010), 2015 edition.

The submitted drawings lack the necessary detail to determine whether the technical standards referred to above could be successfully incorporated into the proposed flat layouts. It is therefore recommended that should the application be approved a condition be attached to any consent that revised floor plans of at least 1:100 be requested as a prerequisite to any planning approval. These should include furnished planned layouts, which clearly demonstrate the access zones and other accessibility provisions set out in Approved Document M for the required M4(2) and M4(3) housing types.

EXTERNAL AMENITY SPACE

The present balance of open space to building footprint would not be significantly altered by the proposal. To determine whether amenity space provision remains adequate in light of the additional units, the Council sets out a guideline figure for flats of 20 sq.m for 1 bed flats and 25 sq.m for 2 bed flats. If space is provided within balconies, this may be deducted from the requirement. The proposed development makes provision as follows:

HDAS Requirement: 28 No. 1 bed flats @ 20 sq.m = 560 sq.m
2 No. 2 bed flats @ 25 sq.m = 50 sq.m
Total HDAS Requirement = 610 sq.m

Total Proposed Amenity Space Provision = 1138.75 sq.m

The proposed shared amenity space for the flats will be a mixture of formal and informal space that would provide an attractive setting for the new development. Therefore, the proposed development is considered to be provided with sufficient outdoor amenity space for the occupiers of the development, in accordance with Policy BE23 of the Hillingdon Local Plan.

LIGHT, OUTLOOK AND OVERLOOKING

All of the habitable rooms within the units require an acceptable source of light and outlook in accordance with Policies BE20 of the Hillingdon Local Plan and 3.5 of the London Plan (March 2016).

In terms of outlook for future residents, Policy BE21 of the Local Plan seeks to ensure that new development would not have a significant loss of residential amenity, by reason of the siting, bulk and proximity of new buildings.

It is considered that the site layout would provide an acceptable standard of amenity for future occupiers. 28 of the 30 proposed units would be dual aspect units. One aspect would be onto the shared sheltered circulation spaces, however the layout has been designed so that kitchen windows would face onto these spaces rather than bedrooms. This conforms with the approach suggested at pre-application stage. The two units in the north west corner of the site would be single aspect and the outlook for the ground floor unit is deemed less than ideal. However given the constraints of the site and the general quality of the amenity level proposed this is not deemed sufficient to warrant a recommendation of refusal of the proposal.

The layout ensures that there is adequate separation between the units. This would result in a satisfactory outlook from the proposed units and reduces the potential for disturbance to the future occupiers. As such, the development is considered to be consistent with relevant design guidance and policies BE21 and OE1 of the UDP.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The proposed development incorporates eight car parking spaces, including two disabled spaces and an electric vehicle charging point. The application site has a PTAL of 4 and is within close proximity to Uxbridge Town Centre. Sufficient space would be provided to enable service vehicles to manoeuvre within the site.

The Council's Highway Engineer has considered the details submitted as part of the application and raised no objections to the proposals.

7.11 Urban design, access and security

The layout provides natural surveillance of the surrounding and central spaces. The main approach is observed from three sides, and directly from the Warden and staff office. The social space (cafe) also ensures an active building appearance within the site and would contribute to surveillance of this area. Additionally the 24 hour warden presence adds considerably to the security of the setting.

The applicant has held discussions with the Metropolitan Police Designing out Crime Officer during the design process and the Officer has been consulted as part of the application process. The Metropolitan Police Designing out Crime Officer has not raised an objection to the proposals. Should the application be approved it is recommended that a condition is attached that requires the development to meet Secure by Design standards.

7.12 Disabled access

The Council's Access Officer has reviewed the proposals in detail and commented on both the justification for the demolition of the heritage asset and the proposed scheme as set out within this report.

The Council's Access Officer has raised no objections to the proposed scheme subject to a condition being attached to any consent that requires the scheme to demonstrate access zones and other accessibility provisions set out in Approved Document M for the required M4(2) and M4(3) housing types.

7.13 Provision of affordable & special needs housing

The application has been submitted by the Uxbridge United Welfare Trust who are a registered charity. The Trust has also confirmed that the proposed almshouses within the development will be provided at 80% or below open market rate which under the London Plan (March 2016) definitions meets the requirements of 'affordable housing'. As such 20 of the proposed 30 units within the development would constitute affordable housing.

7.14 Trees, landscaping and Ecology

The Council's Landscape Architect has reviewed the details submitted with the application and raised no objections to the development subject to the attachment of planning conditions to any consent. These conditions are required to include a Tree Survey, An Arboricultural Impact Assessment, existing and proposed drainage, Tree Protection Plan and an Arboricultural Method Statement to show any incursion into tree root protection areas (RPA's) will be addressed.

A landscape scheme should be also be submitted and any new tree planting specifics should be provided. Subject to these requirements it is deemed that the proposal is acceptable and would be compliant with Policy BE38 of the Hillingdon Local Plan (November 2012).

7.15 Sustainable waste management

The Council's Waste Services Officer has reviewed the application and confirmed that the proposed scheme provides sufficient space for the refuse and recycling requirements. As such Waste Services has no objection to the proposals.

7.16 Renewable energy / Sustainability

The Council's Sustainability Officer has reviewed the details submitted within the application and whilst the energy strategy shows that the development does not achieve the required 35% reduction in CO₂ from 2013 Building Regulations he has raised no objections to the proposed development. This is because the attempts made to make the development compliant have been robust and are acceptable in principle.

Policy 5.2E of the London Plan allows for offsite solutions where there is a shortfall in the target onsite and sets a contribution value of £60/carbon tonne/annum for 30years. The Council's Sustainability Officer advised that the development would be compliant with Policy 5.2 subject to a contribution of £8,856 (4.92CO₂ x £60 x 30years) and a condition requiring that, prior to the commencement of development, full details of the PVs required to meet the CO₂ reductions set out in the energy strategy shall be submitted to and approved in writing by the Local Planning Authority.

7.17 Flooding or Drainage Issues

The Council's Flood and Water Management Officer has reviewed the details submitted as part of the application and raised no objection to the application subject to the attachment of a condition requiring a scheme for the provision of sustainable water management.

Subject to this condition the scheme is considered to be in accordance with Policy EM6 of

the Hillingdon Local Plan: Part 1 - Strategic Policies (Nov 2012), Policies 5.12 and 5.13 and 5.15 of the London Plan (March 2015).

7.18 Noise or Air Quality Issues

The applicant has addressed how any potential impacts of the development will be controlled during both construction and operation. The Council's Air Quality Officer has reviewed the details submitted as part of the application and raised no objection to the proposals subject to the attachment of a condition requiring a scheme for the protection of air quality.

Subject to this condition the scheme is considered to be in compliance with policies 5.3 and 7.14 of the London Plan (March 2015) and paragraph 124 of the NPPF.

7.19 Comments on Public Consultations

Comments received from members of the public that refer to material planning considerations have been discussed within the body of this report. Matters or concerns that are not material planning considerations have not been discussed as they are not material to the consideration of the application.

7.20 Planning obligations

Policy R17 of the Hillingdon UDP is concerned with securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. These saved UDP policies are supported by more specific supplementary planning guidance.

The Council's Section 106 Officer has reviewed the proposal, as have other consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impacts of the development:

As the application is being recommended for refusal, no negotiations have been entered into with the developer in respect of these contributions. However, if the application were to be considered for approval, these heads of terms would have been pursued:

1. Off-site sustainability contribution of £8,856 to a carbon fund.

No legal agreement to address the above issue has been offered. As such, the proposal fails to comply with Policy R17 of the UDP and it is recommended the application should be refused for the following reasons:

1. failure to provide off-site sustainability contribution of £8,856 to a carbon fund.

7.21 Expediency of enforcement action

Not relevant to this application

7.22 Other Issues

None

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. Observations of the Director of Finance

None

10. CONCLUSION

The application proposes the demolition of existing almshouses and the construction of a

new almshouse complex to provide 30 units, including 20 one bedroom flats, 2 No. 2 bedroom flats for live-on-site staff and an additional 8 No. 1 bed flats intended for open market rental (not for sale), to people aged 65 and over.

The existing building is locally listed and is considered to make a significant contribution to the character of the Rockingham Bridge Conservation Area within which it is located. The NPPF Para 126 advises that Heritage Assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

Para 132 advises that 'when considering the impact of a proposal on the significance of an asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification'.

The total demolition of Woodbridge House would lead to substantial harm to the significance of the buildings themselves and also to the Conservation Area. The NPPF is clear that in such circumstances, applications should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that all of the criteria noted in the NPPF (para 133) apply.

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

With regards to demonstrating 'the substantial public benefits that outweigh that harm or loss' the applicant has put forward a number of public benefits of the proposal, including; the existing units are inaccessible and not capable of adaptation, proposals will reduce energy usage and CO2 emissions, will increase sheltered housing provision and provides affordable housing, is financed without contribution from the public, addresses an identified deficit in elderly housing provision, contributes to the social fabric of Uxbridge and reduces inequality and discrimination in the existing accommodation offer.

The value of the stated public benefits has been considered against the loss of the Heritage Asset and, given the value of the Heritage Asset and the professional opinion of the Access Officer that the buildings could be adapted, the principle of the demolition of the existing locally listed building and replacement with the proposed development is considered to be unacceptable.

The application is therefore contrary to Policy BE4 of the Hillingdon Local Plan (November 2012), Policy 7.8 of the London Plan (March 2016) and the NPPF.

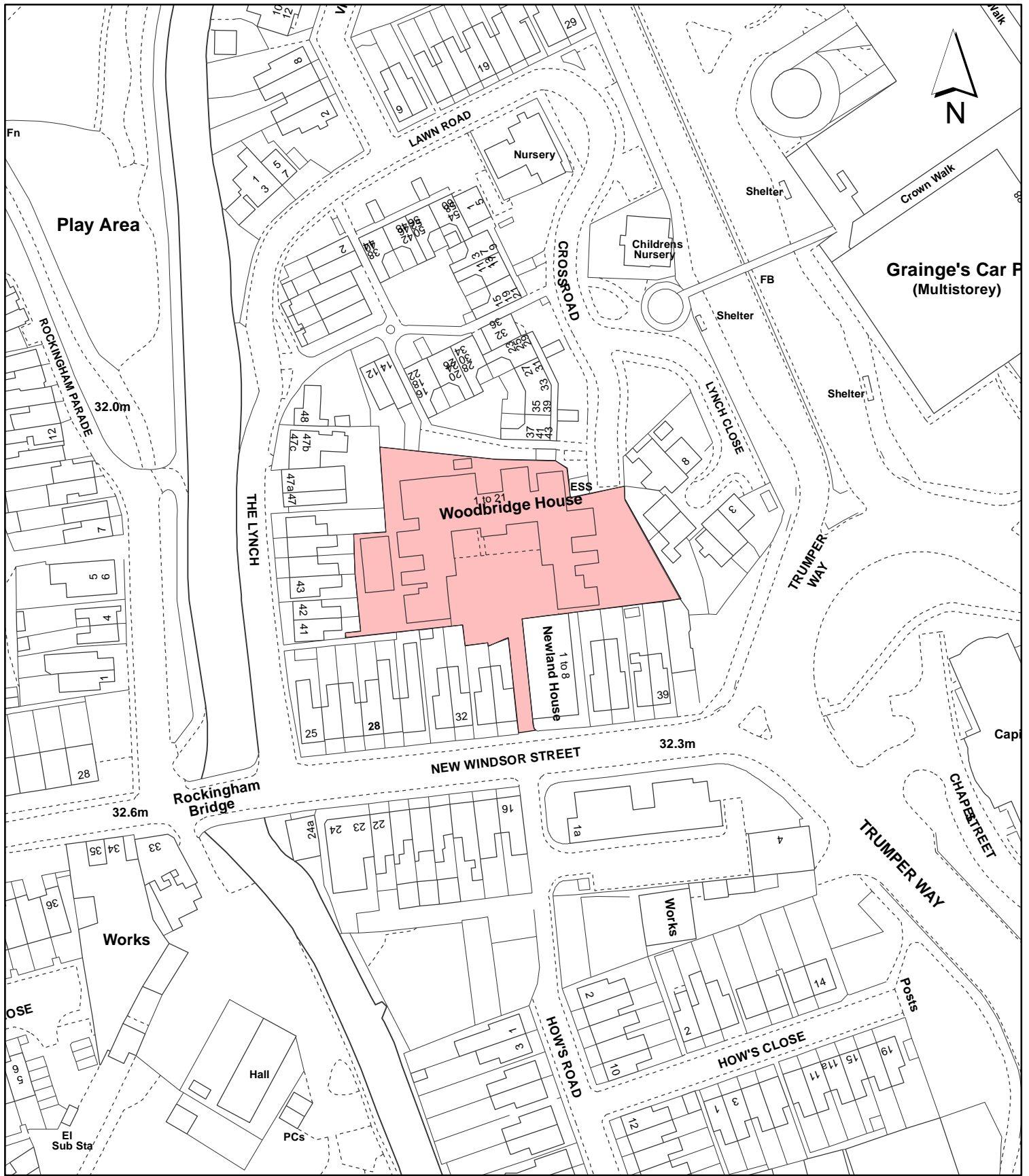
11. Reference Documents

- Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
- Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)
- London Plan (March 2016)
- National Planning Policy Framework
- Hillingdon Supplementary Planning Document - Accessible Hillingdon
- Hillingdon Supplementary Planning Document - Noise

Hillingdon Supplementary Planning Guidance - Air Quality
Hillingdon Supplementary Planning Guidance - Community Safety by Design
Hillingdon Supplementary Planning Guidance - Land Contamination

Contact Officer: Ed Laughton

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Notes:

 Site boundary

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Site Address:

Woodbridge House

Planning Application Ref:

20590/APP/2016/1383

Planning Committee:

Major

Scale:

1:1,250

Date:

August 2016

LONDON BOROUGH OF HILLINGDON
Residents Services
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HILLINGDON
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