

Report of the Head of Planning, Transportation and Regeneration

Address	LAND OFF HAREFIELD ROAD UXBRIDGE
Development:	Comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2), restaurant, cafe and nursery (Use Class E) in buildings up to 7 storeys with car parking, landscaping and associated works. Detailed Description: 182 units, together with integrated nursing care and associated communal and support services including ancillary communal, care and well-being facilities including a restaurant, cafe/bar and wellness centre/gym and a children's nursery.
LBH Ref Nos:	16299/APP/2020/3313
Drawing Nos:	ONS Household Composition Data Hillingdon Household Expenditure by Gross Income Quintile Group Report on Length of Stay in Care Homes Better Lives for Older People Study dated February 2019 Economic Impact Assessment dated February 2021 Response to Highways Comments dated February 2021 UXB001-MPI-XX-XX-DR-A-200201 Rev. P UXB001-MPI-XX-XX-DR-A-200203 Rev. P UXB001-MPI-XX-XX-DR-A-200202 Rev. P UXB001-MPI-XX-XX-DR-A-200204 Rev. P UXB001-MPI-XX-XX-DR-A-200210 Rev. P UXB001-MPI-XX-XX-DR-A-200300 Rev. P UXB001-MPI-XX-XX-DR-A-200301 Rev. P UXB001-MPI-XX-XX-DR-A-200302 Rev. P UXB001-MPI-XX-XX-DR-A-200303 Rev. P UXB001-MPI-XX-XX-DR-A-100002 Rev. P UXB001-MPI-ZZ-MZ-DR-A-200000_02 Rev. P UXB001-MPI-ZZ-01-DR-A-200001 Rev. P UXB001-MPI-ZZ-02-DR-A-200002 Rev. P UXB001-MPI-ZZ-03-DR-A-200003 Rev. P UXB001-MPI-ZZ-04-DR-A-200004 Rev. P UXB001-MPI-ZZ-05-DR-A-200005 Rev. P UXB001-MPI-ZZ-06-DR-A-200006 Rev. P UXB001-MPI-XX-XX-DR-A-100001 Rev. P UXB001-MPI-ZZ-XX-DR-A-200010 Rev. P UXB001-MPI-ZZ-01-DR-A-200101 Rev. P UXB001-MPI-ZZ-02-DR-A-200102 Rev. P UXB001-MPI-ZZ-03-DR-A-200103 Rev. P UXB001-MPI-ZZ-04-DR-A-200104 Rev. P UXB001-MPI-ZZ-05-DR-A-200105 Rev. P UXB001-MPI-ZZ-06-DR-A-200106 Rev. P UXB001-MPI-ZZ-XX-DR-A-200110 Rev. P UXB001-MPI-XX-XX-DR-A-200500 Rev. P UXB001-MPI-XX-XX-DR-A-210300 Rev. P UXB001-MPI-XX-XX-DR-A-210301 Rev. P UXB001-MPI-XX-XX-DR-A-210302 Rev. P

UXB001-MPI-XX-XX-DR-A-300100 Rev. P
UXB001-MPI-XX-XX-DR-A-300101 Rev. P
UXB001-MPI-XX-XX-DR-A-300102 Rev. P
Daylight, Sunlight and Overshadowing
Response to FVA dated 12 January 2021
Acoustic Planning Report dated January 2021
Acoustic Technical Note
Response to Daylight and Sunlight Report dated January 2021
Response to Social Care Comments
Supporting Information in Relation to Similar Sites in the Borough
Land Registry Price Paid Data - Hillingdon Transactions 2020
Experian Data for 65+ age Group
Planning Needs Assessment dated February 2021
Care Funded Years Calculation
Overheating Risk Assessment Technical Note
Air Quality Assessment dated September 2020
Design and Access Statement dated September 2020
Flood Risk Assessment dated September 2020
Utility Infrastructure Strategy dated September 2021
Heritage and Townscape Assessment dated September 2020
Ground Investigation Report September 2020
Acoustic Planning Report dated September 2020
20200227-20-01
UXB001-MPI-XX-XX-DR-A-010100 Rev. P
UXB001-MPI-XX-XX-DR-A-010002 Rev. P
UXB001-MPI-XX-XX-DR-A-010200 Rev. P
UXB001-MPI-XX-XX-DR-A-100001 Rev. P
UXB001-MPI-XX-XX-DR-A-100002 Rev. P
Demolition and Site Waste Management Plan dated September 2020
Sustainability Appraisal dated September 2020
UXB001-MPI-XX-XX-DR-A-010001 Rev P
Daylight, Sunlight and Overshadowing Report dated September 2020
Travel Plan dated September 2020
Tree Survey and Arboricultural Assessment dated September 2020
Site Statement dated September 2020
Wind Microclimate Assessment dated September 2020
Archaeological Desk Based Assessment dated September 2020
Energy Statement dated September 2020
Construction Logistics Plan dated September 2020
Delivery and Servicing Plan dated September 2020
Preliminary Ecological Appraisal dated September 2020
Covering Letter dated October 2020
Utility Infrastructure Strategy dated March 2021
Sustainability Statement dated March 2021
Fire Statement dated March 2021
Landscape Addendum dated March 2021
624_P_00_100 Rev. P11
624_P_02_101 Rev. P03
624_P_02_102 Rev. P04
624-S-00-172 Rev. P01

624_S_00_171 Rev. P01
624_S_00_210 Rev. P01
Flood Risk Assessment and Drainage Strategy, dated March 2021
Townscape Review dated March 2021
Covering Letter dated March 2021
Letter of Conformity - Archaeological Desk Based Assessment dated march 2021
Letter of Conformity - Ecology dated march 2021
Air Quality Assessment Addendum dated March 2021
Tree Survey & Arboricultural Assessment dated March 2021
Internal Daylight, Sunlight Overshadowing Addendum Report
Planning Review Confirmation relating to Demolition and Site Waste Management Plan and Construction Environmental Management Plan dated March 2021
Planning Statement Addendum dated March 2021
S-00-174 Issue P02
Letter of Conformity, Geo-environmental Assessment dated March 2021
UXB001-MPI-XX-XX-MR-A-000010 Rev. P
UXB001-MPI-XX-XX-MR-A-000011 Rev. P
UXB001-MPI-XX-XX-MR-A-000012 Rev. P
UXB001-MPI-XX-XX-MR-A-000013 Rev. P
UXB001-MPI-XX-XX-DR-A-010001 Rev. P
UXB001-MPI-XX-XX-DR-A-010002 Rev. P
UXB001-MPI-ZZ-XX-DR-A-010004 Rev. P
UXB001-MPI-ZZ-XX-DR-A-010005 Rev. P
Technical Addendum Noise dated March 2021
Transport Assessment Addendum dated March 2021
Detailed Construction Logistics Plan dated March 2021
Delivery and Servicing Plan dated March 2021
913-TSY-ZZ-XX-RP-C-1001
913-TSY-ZZ-XX-RP-C-1001 Rev. 001
913-TSY-ZZ-XX-DR-C-8001 Rev. P
913-TSY-ZZ-XX-DR-C-8000 Rev. P
Financial Viability Assessment dated September 2020
Response to Contaminated Land Matters dated September 2020
Response to Access Officer Comments dated December 2020
Response to Air Quality Officer Comments dated December 2020
Response to Refuse and Waste Officer Comments dated December 2020
Principle of On/Off-site Affordable Housing dated January 2021
Travel Plan dated March 2021
Heritage, Townscape and Visual Impact Assessment Addendum dated March 2021
Letter of Conformity (Wind) dated March 2021
Statement of Community involvement dated March 2021
Design and Access Statement Addendum dated March 2021
Energy Statement dated March 2021
UXB001-MPI-ZZ-00-DR-A-200000 Rev. P
UXB001-MPI-ZZ-00-DR-A-200100 Rev. P
UXB001-MPI-ZZ-MZ-DR-A-200100_02 Rev. P
UXB001-MPI-XX-XX-DR-A-200200 Rev. P

Date Plans Received:	15/10/2020	Date(s) of Amendment(s):	02/03/2021
Date Application Valid:	27/10/2020		26/01/2021
			04/12/2020
			20/01/2021
			15/10/2020
			12/04/2021
			19/01/2021

1. **SUMMARY**

The application seeks permission for the comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2), restaurant, cafe and nursery (Use Class E) in buildings up to 7 storeys with car parking, landscaping and associated works.

The proposal has been amended during the course of the application in response to statutory and internal consultee comments. The amendments include revisions to the height of the proposed building, incorporating additional soft landscaping. The proposed wellness centre and nursery spaces have been reconfigured.

The main considerations of the application are the principle of the development, land use, housing quality, affordable housing provision, design and appearance, impact upon heritage assets, impact upon neighbouring residential amenity, transport and highways implications, and energy and sustainability measures.

In land use terms, the proposal would result in the loss of existing retail units is not considered to result in harm to the viability and vitality of the town centre. The proposed provision of specialist older persons accommodation would contribute to meeting the annual benchmark of 180 units per annum set by the London Plan (2021).

The applicant proposes to offer a financial contribution for off-site affordable housing of £500,000. The Financial Viability Assessment was reviewed by an independent viability consultant who considers the scheme generates a positive land value of £3,078,000 and therefore the off-site contribution should be greater than that offered by the applicants. The applicant disagrees with this position. It is considered that the proposals have failed to demonstrate the proposed contribution is the maximum reasonable amount of affordable housing that could be provided by the scheme.

The proposed development has been designed to cater for residents requiring care and support. The proposal provides communal facilities, which would be accessible to residents and to the public, including a children's nursery and a wellness centre. Various uses within the development include the wellness centre, library, therapy and treatment rooms, which encourage social interaction. Officers give positive weight to the social and community benefits arising from this scheme.

Impact to the level of daylight and sunlight of neighbouring properties has been fully

considered following the submission of a daylight and sunlight report, which highlights minimal transgressions is considered acceptable within the context of the site. The protection of neighbouring privacy has sufficiently been mitigated through design and relevant planning conditions. Overall, neighbouring amenity is not considered to be unduly harmed by the development.

The layout, scale and height of the proposal is considered to be unacceptable. The application proposal fails to provide an appropriate transition between this edge of town centre location and the suburban residential context to the north of the site.

The site has a high public transport accessibility level (PTAL) of 5. The development proposes some on-site accessible parking for future residents, mini bus car parking and drop off and pick up bays are also proposed. However, due to the design of the internal road layout the legibility and usability of the public realm is considered to be compromised. This is due to the multiple users and uses competing within this confined space, together with the distance between the proposed car parking drop off bays and accessible units and the heavy reliance on a managed car parking scheme which is an unsustainable long term solution.

The Council's sustainability officer has raised objections to the methodology used for the overheating assessment and considers it has a number of failures when measured against the relevant standards. This relates to an overheating assessment policy which has been reinforced in the new London Plan. Given the nature of the building and its intended occupancy, there is a particular degree of vulnerability that requires further consideration prior to planning permission being granted. Officers consider there is no option as such other than to recommend refusal on this ground unless a more robust overheating assessment can be provided pre-determination.

Great weight has been attached to the delivery of specialist older persons accommodation (noting the support for the scheme from the local resident association), notwithstanding the weight given to all of the benefits arising from the implementation of the delivery of the proposed development, the harm arising from the scheme clearly and demonstrably outweigh the benefits when assessed against the Development Plan and the NPPF taken as a whole. The application is therefore recommended for refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The proposed development, by virtue of its height, scale and mass forms a dominant and discordant form of development in this edge of town centre location and it fails to respond to its local context. The proposals would fail to respect the established pattern and scale of development within the streetscene and would fail to contribute positively to the area's character. Furthermore the proposed design and layout of the internal road relies on a heavily managed car parking scheme, would compromise the legibility and usability of the public realm. The proposal is considered to be an over development of the site and contrary to Policy BE1 of the Local Plan: Part One (November 2012), Policies DMHB 10, DMHB 11 and DMHB 12 of the Local Plan: Part Two Development Management Policies (2020), Policies D1-D3, D8, D9, T6.5 and T7 of the London Plan (2021) and Paragraphs 95, 108, 110, 127 and 130, 131 of the NPPF (2019), National Design Guide Planning practice guidance for beautiful, enduring and successful places (2019) and Paragraphs 125, 129, 130, 131, 133 of the NPPF Draft text for consultation (2020).

2 NON2 Non Standard reason for refusal

The proposed development fails to provide the maximum reasonable amount of affordable housing contrary to Policy H2 of the Local Plan: Part One (2012) , Policy DMH 7 of the Local Plan: Part Two (2020), Policies H4, H5 and H13 of the London Plan (2021) and Paragraph 64 of the NPPF (2019) and The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017).

3 NON2 Non Standard reason for refusal

The proposed development, in the absence of an overheating assessment that uses an appropriate data set to carry out the assessment, has failed to provide sufficient information to demonstrate the risk of overheating has been reduced as far as practical and that all passive measures have been explored contrary to Policies BE1 and EM1 of the Local Plan: Part One (November 2012), Policy DMHB 11 and DMEI 2 of the Local Plan: Part Two Development Management Polices (2020) and Policy SI4 the London Plan (2021).

4 NON2 Non Standard reason for refusal

The proposed development, in the absence of a Section 106 legal agreement, fails to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of securing C2 Use, air quality contributions, affordable housing, construction training, highways works, carbon offset, employment and training, servicing and delivery and project management and monitoring). The scheme therefore conflicts with Policy DMCI 7 of the Hillingdon Local Plan: Part Two Development management Policies (2020), the London Borough of Hillingdon Supplementary Planning Document on Planning Obligations, Policy DF1 of the London Plan (2021) and paras 54-57 of the NPPF 2019.

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 Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan 2021 and national guidance.

DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy

DMEI 9	Management of Flood Risk
DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 7	
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 4	Conservation Areas
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMAV 1	Safe Operation of Airports
LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E9	(2021) Retail, markets and hot food takeaways
LPP G1	(2021) Green infrastructure
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG6	(2021) Increasing efficiency and resilience
LPP H10	(2021) Housing size mix
LPP H13	(2021) Specialist older persons housing
LPP HC1	(2021) Heritage conservation and growth
LPP S1	(2021) Developing London's social infrastructure
LPP S3	(2021) Education and childcare facilities
LPP SD6	(2021) Town centres and high streets
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk

LPP SI5	(2021) Water infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
LPP T9	(2021) Funding transport infrastructure through planning

3 I71 LBH worked applicant in a positive & proactive (Refusing)

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 Local Plan Part 1, Local Plan Part 2, 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. In addition further guidance was offered to the applicant by the case officer during the processing of the application to identify the amendments to address those elements of the scheme considered unacceptable. However, the amendments required to make the application acceptable are substantial and would materially change the development proposal. They would require further consultation to be undertaken prior to determination which could not take place within the statutory determination period specified by the Department of Communities and Local Government. You are therefore encouraged to consider the submission of a fresh application incorporating the material amendments set out below which are necessary to make the scheme acceptable.

3. CONSIDERATIONS

3.1 Site and Locality

The application site is located on the south eastern side of Harefield Road. The site measures 0.93 hectares and comprises 2 purpose built retail units with an overall footprint of 3,150 sq.m (formerly Class A1, now Class E). Unit 1 Harefield Road is currently occupied by Wickes, and Unit 2 Harefield Road is currently occupied by Halfords. Each unit is single-storey but sections of mezzanine flooring have been provided for office and / or additional retail space. The surrounding area is characterised by a mix of uses, services and facilities including residential, retail, civic and commercial uses.

To the south west of the site is Uxbridge Police Station, a 3-storey building on lower lying land. To the south east of the site is Beasley Court which is a 4-storey office building adjacent to the access from Warwick place to the south. To the north-east is a group of light industrial units on what is known as the Penfield Estate. To the north of the site are the rear boundaries of gardens belonging to the terraced and semi-detached dwellings that line Lancaster Road and Harefield Road.

The site is self contained and is served by its own car parking area which is provided to the front of the buildings. The parking is controlled by a private company and is for use by customers only. The site level is raised approximately 1.2 metres above the level of Harefield Road. The site begins to slope gently downwards towards the rear (south-east).

The site is located alongside Harefield Road, which is recognised as a local distributor road. The site is accessed directly from Harefield Road via a purpose built junction and a two-way access road. A turning bay is marked out on Harefield Road to accommodate waiting vehicles that are turning right into the site. The access road continues along the southern side of the buildings, servicing a yard and loading area to the rear of the shops and then looping to the west to join with Warwick Place. Access from Warwick Place is currently controlled by a gate.

The site includes mature trees and hedging planted around the fringes of the car parking behind a brick retaining wall that faces on to Harefield Road and continues around the remaining edges of the car park. There are also landscaped parcels and individual trees within the car park and a belt of mature trees providing a buffer between the retail buildings and the rear of gardens belonging to dwellings on Lancaster Road to the north-east.

Part of the Old Uxbridge / Windsor Street Conservation Area, which consists of shops on the eastern side of the High Street, lies approximately 60 metres to the south-west of the site. A number of the shop buildings within the Conservation Area are Listed. Approximately 225 metres to the west are the Uxbridge Lock and Rockingham Bridge Conservation Areas, which comprise of canal side landscaping and development. The North Uxbridge Area of Special Character extends to the north east of the site. 13 and 15 Lancaster Road, which back on to the eastern site boundary, are included within the Area of Special Character.

Watts Hall, a former chapel which is a Grade II Listed Building, is located close to the site, where the access road meets Warwick Place. Part of the magistrates court, which is to the west of the site on the opposite side of Harefield Road, is locally listed.

The site lies within an Archaeological Priority Area and an Air Quality Management Area. The most south western section of the site is also within an Air Quality Focus Area.

The site is located within the northern end of Uxbridge Town Centre which extends towards the west, where the majority of development consists of office buildings and to the south where the main concentration of retail is. The site itself does not fall within a primary or secondary shopping centre. Tall buildings within Uxbridge are concentrated towards the perimeter of the town centre, generally towards the north and west. The majority of these buildings contain offices although there are also residential buildings including the 8-storey building currently under construction at the Fassnidge site, approximately 150 metres south-west of the proposal site and Denham Lodge which is a 10-storey residential tower block approximately 350 metres to the west, which falls just outside of the Borough.

The site has a Public Transport Accessibility Level (PTAL) score of 5 (very good). The site is within walking distance of Uxbridge bus and train stations.

3.2 Proposed Scheme

The application is seeking planning permission for the comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2), cafe/restaurant and nursery (Use Class E) in buildings

up to 7-storeys, car parking, landscaping and associated works.

The proposal seeks to provide an Assisted Living development (Use Class C2) with ancillary uses supporting the main use. The development would be available to, and occupied by, those over 65 years of age qualifying for at least 2.5 hours of weekly medical care.

Within the residential care accommodation, 3 types of living accommodation will be provided, depending upon the needs of the residents. These include:

- 1) Guild Living Residences (GLR) - Specialist older persons accommodation which provides care in a style that can respond flexibly to increasing need while helping the individual to retain their place within their existing community. The units require tenancy agreements and are restricted to over 65s (unless they have a partner who would also be living in the accommodation). A minimum of 2.5 hours a week of personal care/support will be provided.
- 2) Guild Care Residences (GCR) - Functions as traditional care home accommodation where personal care and accommodation are provided together as a package. The units are available to rent and are restricted to over 65s (unless they have a partner who would also be living in the residences). Typically, there would be at least 3 hours of care per day for those with mobility, nursing or cognitive needs, but could also include companionship and company.
- 3) Guild Care Suites (GCS) - It would function very similar to GCR with an added level of care. End of life needs could be managed here, as can nursing and dementia needs. The units are restricted to over 65s.

The care product being provided by Guild Living would provide a suite of facilities and services designed to meet the needs of residents that require a level of support or care. The applicant states the provision, required by all residents, includes (but is not limited to):

- Time spent with the Guild Team to manage and arrange the delivery of prescription, medication, or food services specific to the individual needs.
- Time spent with the Guild Team to organise and facilitate visiting clinical care specialists or allied health professionals.
- Time spent with the Guild Team to plan and arrange home support which could include cleaning, laundry, and other domestic support.
- Access to Wellbeing facilities, services, classes, and expertise to support the prevention of health decline.
- Health or wellbeing checks, such as blood pressure, temperature, heart rate, and other health care indicators.
- Advice on health, including nutrition and other foundations of wellbeing, including physical exercise.
- Organised rehabilitation, following a hospital visit or health event.
- Additional organised care services are provided, such as GP Visits, with access to further levels of care available for all residents as and when required.
- Personal care assistance, aiding with mobilising, bathing, going to the toilet, dressing, eating or drinking.
- A 24-hour emergency response system which will provide:
 - * attendance at residence if required.
 - * comfort, reassurance, and peace of mind to residents.
 - * facilitate/greet/liaise with emergency services if called.

- Use of the transport services for trips out into the wider community.
- Advice, encouragement, and supervision relating to the above activities.

The care element would either be provided by Guild Living's in-house care service or an alternative care provided that is registered with Care Quality Commission (CQC).

Residents would have access to communal facilities that are fully integrated within the proposed development to foster communal living. This includes:

- A wellness centre (comprising: gym space, flexible studio space, hydro therapy pool and consultation rooms);
- A restaurant/cafe, alongside a bar and flexible space for meetings and events;
- A resident's library and lounge area; and
- Outdoor amenity areas, comprising a rooftop garden (including a sensory garden), a community plaza (with spaces for socialising and seating) and communal landscaped gardens (including: spaces for sport activities, outdoor classes, picnic, reading, gardening and vegetable cultivation and relaxing).

The applicant seeks to provide a programme of community involvement which encourages communal living and seeks to combat loneliness. The applicant would offer:

- Exercise classes;
- Reading clubs;
- Art and craft classes/ clubs;
- External speaker events including local groups to present;
- Gardening clubs/ classes;
- Days out/ events;
- Cooking classes; and
- Film/movie nights.

The communal facilities would be available to and can be accessed by all residents. The cost of the communal facilities will be included within the Monthly Membership Fee (MMF) which is proposed to be c. £7,700 per annum. A similar product in West Ruislip would typically charge £9,584 per annum for a 2-bed and £7,190 per annum for a 1-bed. The proposed MMF would be consistent with similar products in the Borough.

DETAILS OF PROPOSAL

Following a review of consultee comments and several meetings with officers, the application has been amended and now proposes:

Units

The application comprises the following:

- 153 Guild Living Residences;
- 24 Guild Care Suites; and
- 5 Guild Care Residences which are transitional care apartments.

Unit Mix

- Guild Living Residence: 9 x studios and 26 x 1 bed, 114 x 2 bed and 4 x 3 bed.
- Guild Living Care Residences: 5 x 1 bed.

- Guild Care Suites 24 x 1 bed.

Affordable Housing

A Financial Viability Appraisal (FVA) has been submitted by the Applicant who is seeking to make a payment in lieu of affordable housing of £500,000.

Wellness Centre and Restaurant/Cafe

- Located to front the main courtyard and provides good access to the facility and the inclusion of a hydrotherapy pool.
- Restaurant/Cafe area is configured to provide an integrated offer and increased flexibility

Nursery

Nursery and dedicated external play located to the south-eastern elevation. Access to the nursery is from the public courtyard.

Internal Access Road

The new internal access road moves traffic into the site via Harefield Road into a one way system with traffic exiting onto Warwick Place. The internal access road is a shared space layout and serves to provide a vehicle route and pedestrian footpaths, parking spaces, mini bus space and access into the various uses on the site.

Layout

The proposal comprises 2 L-shaped blocks that are positioned around a central courtyard and podium garden. The site will be accessed off Harefield Road leading to an internal service road situated behind the police station.

Block A is the south western block along Harefield Road which steps down in height to 3-storeys where it adjoins the suburban residential dwellings.

Block B is the north eastern block backing onto the Penfield Estate/Lancaster Road. The northern, eastern and southern part of the blocks would be centered around the public plaza, accessed via the porte cochere/covered entrance which includes commercial and communal space at surface level and residences above. A communal garden is provided at podium level.

Scale/Height Massing:

The proposed development would be up to 7-storeys in height.

The western / southern block (Block A) fronting onto Harefield Road is 3 - 7-storeys in height with 3 - 5-storeys at the lower levels along Harefield Road. The north / eastern block (Block B) is 4-7 storeys. The proposal includes stepped massing across the development.

Appearance

The Harefield Road frontage would feature a mix of light and dark mortar red brickwork, reveals, set back bricks, juliette balconies and planters.

The main elevation to the south (to the rear of the police station) is proposed to have a vertical appearance with a variety of brick patterns, metal spandrels and reveals. The upper floors and cores would be finished with metal cladding.

Amenity Space

476 sq.m of private amenity space is being provided through 32 balconies measuring 5 sq.m and 16 gardens.

2,677 sq.m of communal amenity space is being provided through the magistrates garden situated to the north and the podium garden.

The development would also provide 852 sq.m of public open space at surface level.

Mobility Scooter Store

A mobility scooter store is provided at ground floor level accessed via the internal access road.

Car Parking

The proposal comprises 76 spaces that are wheelchair accessible facilitated through a valet service. The parking arrangement is provided at ground level under the podium in a double-banked stacker arrangement. Residents will drop their cars to either the porte cochere or one of the 5 dedicated temporary valet spaces and provide their keys to the valet who will be responsible for parking their car.

Along the access road, 16 dedicated car parking spaces and two drop off bays are being provided which are intended to be used flexibly to accommodate the the following:

- 5 x residential valet bays (including 2 wheelchair accessible bays);
- 5 x visitor bays (all oversized bays)
- 2 x staff parking (shared between all proposed uses);
- 1x minibus space;
- 1x dedicated nursery space (accessible bay);
- 2x shared nursery/valet accessible spaces; and
- Up to 2x drop off/pick up bay (port cochere).

The access road is a private road and the applicant proposes to manage and enforce it themselves. All parking and vehicle movements are proposed to be controlled as part of a managed solution by the applicants, this relates to the car parking within the undercroft and all movements along the internal access road.

Cycle Parking

76 cycle parking spaces are being provided of which 32 are secure long-stay spaces and 44 are short stay spaces.

Refuse and Recycling

The site would be managed and collection is anticipated to take place twice weekly. A dedicated refuse pick up and drop off bay is provided to the east of the main entrance. Small refuse store has been relocated to prevent bins being wheeled through the central

courtyard.

Trees and Landscaping

The existing site comprises 45 individual trees, 2 tree groups and 1 hedge. 37 trees and the hedge are of a poor quality. The proposed development would remove 27 trees to enable the development which are 'C' and 'U' grade trees, two of the trees proposed to be removed are 'B' grade trees, namely T26 and T39.

The proposal includes a central plaza, magistrates garden to the north east and a podium level public space. The proposal includes hard and soft landscaping scheme which is set out in the Landscaping Strategy. The internal access road includes a shared surface with paving and tonal contrast to delineate between pedestrian and vehicular spaces.

3.3 Relevant Planning History

16299/APP/2018/1849 Land Off Harefield Road Uxbridge

Demolition of existing buildings and erection of 3 blocks (part 4, 5, 8, 9 and 12 storeys) to provide 267 self-contained units (32 x studios, 107 x 1- bedroom, 115 x 2-bedroom and 13 x 3-bedroom) with commercial floorspace at ground floor level (Use Classes A1, A2, A3 and B1) and associated landscaping, including public realm improvements, provision of 9 accessible car parking spaces and ancillary works. (Amendments include design changes and increase of 3 units)

Decision: 19-02-2019 Refused

Comment on Relevant Planning History

Under planning ref: 16299/APP/2018/1849 (21-03-19) planning permission was refused for the demolition of existing buildings and erection of 3 blocks (part 4, 5, 8, 9 and 12 storeys) to provide 267 self-contained units (32 x studios, 107 x 1- bedroom, 115 x 2-bedroom and 13 x 3-bedroom) with commercial floorspace at ground floor level (Use Classes A1, A2, A3 and B1) and associated landscaping, including public realm improvements, provision of 9 accessible car parking spaces and ancillary works. (Amendments include design changes and increase of 3 units).

The application was refused with 15 reasons listed:

1) The proposed development, by reason of its gated access and privately accessible ground floor uses, fails to have ground floor activities that provide a positive relationship to the surrounding streets or make a significant contribution to local regeneration. The proposal is therefore contrary to Policy H1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Emerging Policies DMHB 10 and DMHB 12 of the Local Plan: Part 2 - Development Management Policies (2015), Policy 7.7 of the London Plan (2016) and the National Planning Policy Framework.

2) The proposal, by reason of the scale of development and number of residential units proposed would give rise to an over-intensive use of the site with a density of development that would be out of keeping with and detrimental to the character of the area. Furthermore the scheme has an unacceptably low number of family units (3 bed or more) with many flats being single aspect. The proposal is therefore contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE13, BE19, H4 and H5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Emerging Policies DMH 2 and DMHB 17 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 3.4 of the London Plan (2016) and the National Planning

Policy Framework.

- 3) The proposal does not make adequate provision for car parking in accordance with the Council's adopted standards. This is likely to result in on-street parking displacement to the detriment of highway and pedestrian safety. The proposal is therefore contrary to the Council's adopted policies in particular Policy AM14 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) and Emerging Policy DMT 6 of the Local Plan: Part 2 - Development Management Policies (October 2015).
- 4) The proposed development by reason of its height, bulk, mass and design represents an overdevelopment of the site that would have an adverse impact that fails to preserve or enhance the setting of the surrounding listed buildings, the Old Uxbridge/Windsor Street conservation area, surrounding locally listed buildings and the North Uxbridge area of special local character. The development would therefore be contrary to Policies BE1, SO1 and HE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE4, BE13 and BE19 of the Local Plan: Part 2 (November 2012), Emerging Policies DMHB 1, DMHB 4 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015) and Policies 7.1, 7.4 and 7.6 of the London Plan (2016).
- 5) The development, by virtue of its overall scale, bulk of built development, height, density, site coverage and lack of landscaping and screening, is considered to constitute an over-development of the site, resulting in an unduly intrusive, visually prominent and incongruous form of development, which would fail to respect the established character or compliment the visual amenities of the street scene and local area and would mar the skyline contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE13 & BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Emerging Policies DMHB 10 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policies 3.5, 7.4 and 7.6 of the London Plan (2016) and the National Planning Policy Framework (2018).
- 6) The proposal, by reason of its scale, mass and design is considered to result in overdominance and have a detrimental impact on the residential amenities of existing residential properties, thus failing to accord with Policies BE19 and BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), the Council's Supplementary Planning Document 'Hillingdon Design and Access Statement' (HDAS), Emerging Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 3.5 of the London Plan (2016) and the National Planning Policy Framework.
- 7) The proposed scheme fails to provide amenity space of sufficient size, level and quality commensurate to the scale and level of development proposed, resulting in an over-development of the site detrimental to the residential amenity of future occupiers. As such the proposal would provide a substandard form of accommodation for future residents contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE20 and BE23 of the Hillingdon Local Plan: Part Two - UDP Saved Policies (November 2012), Emerging Policies DMHB 10 and DMHB 18 of the Local Plan: Part 2 - Development Management Policies (October 2015) and the adopted Supplementary Planning Document - Residential Layouts SPD (2006).
- 8) The proposed development by reason of its layout and design fails to provide sufficient outlook and privacy for future occupants of the proposed buildings resulting in a development that is detrimental to the amenity of future occupiers of the site. The development would therefore be contrary to Policies BE20, BE21 and BE24 of the Local

Plan: Part 2 (November 2012) and Policy 7.1 of the London Plan (2016).

9) The proposed drainage strategy fails to demonstrate that surface water run off is controlled to ensure the development does not increase the risk of flooding. This is contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Emerging Policies DMEI 9 and DMEI 10 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policy 5.12 Flood Risk Management, Policy 5.13 Sustainable Drainage and Policy 5.15 Water use and Supplies of the London Plan (March 2016) and the National Planning Policy Framework.

10) The proposed development, by reason of the waste arrangements, has failed to demonstrate that waste can be collected in an acceptable manner and that the residential amenity of future residents would not be detrimentally impacted upon. As such it is deemed to be contrary to Policy EM11 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies BE19, BE20, BE21 and BE23 of the Local Plan: Part 2 (November 2012), Emerging Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015), London Plan Policy 5.17 and HDAS - New Residential Layouts.

11) The development fails to satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, contrary to Policy PT1.EM1 of Hillingdon Local Plan Part 1, Emerging Policy DMEI 2 of the Local Plan: Part 2 - Development Management Policies (October 2015), Policies 5.2, 5.13 and 5.15 of the London Plan (2016) and the National Planning Policy Framework.

12) The proposed scheme fails to retain existing trees that are deemed worthy of protection or proposed measures to mitigate against the loss of these landscape features of merit. In addition the level of soft landscaping proposed is deemed to be minimal and insufficient to mitigate the urbanising impact of the development. The scheme therefore fails to satisfy Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), saved policy BE38 of the Hillingdon Local Plan: Saved UDP Policies (November 2012) and Emerging Policies DMHB 11, DMHB 12 and DMHB 14 of the Local Plan: Part 2 - Development Management Policies (October 2015).

13) The proposed development has failed to justify the loss of the existing retail capacity and to demonstrate that options for optimising and enhancing the provision of retail floorspace as part of a mixed use scheme have been considered. As such the proposal has failed to protect and enhance the role of Uxbridge as a Metropolitan town centre. As such it is deemed to be contrary to Policy E4 of the Local Plan: Part1 - Strategic Policies (2012), Policy 4.8 of the London Plan (2016) and Annex 2 of the NPPF (2018).

14) The submitted Daylight and Sunlight report states that 27% of the proposed units fail daylight requirements in accordance with BRE guidelines. In addition the application has failed to provide evidence that the proposed amenity areas accord with BRE daylight, sunlight and overshadowing standards as well as details of microclimate for the proposed development. As such the proposal is contrary to Policies BE19,BE20, BE21 and BE23 of the Local Plan: Part 2 (November 2012), Emerging Policies DMHB 10 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (October 2015) and the National Planning Policy Framework(2018).

15) The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in

respect of Public Realm Works, Travel Plans, Construction Training, Carbon Offset, Affordable Housing, Secure by Design and Project Management and Monitoring). The scheme therefore conflicts with Policy R17 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Emerging Policy DMCI 7 of the Local Plan: Part 2 - Development Management Policies (October 2015) the adopted Supplementary Planning Document 'Planning Obligations and Policy 8.2 the London Plan (2016).

The current application differs from the previously refused scheme. It seeks to provide specialist older persons accommodation (Use Class C2).

PENFIELD INDUSTRIAL ESTATE

A live application is being considered on the adjacent Penfield Industrial Estate under planning ref: 21682/APP/2020/3608 for the redevelopment of site to include a two storey building comprising 4 x 1-bed self-contained flats, and 3 x Use Class E building units including parking and landscaping.

4. Planning Policies and Standards

Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
The West London Waste Plan (2015)
The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM4 (2012) Open Space and Informal Recreation
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation

- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.H1 (2012) Housing Growth
- PT1.HE1 (2012) Heritage
- PT1.T1 (2012) Accessible Local Destinations

Part 2 Policies:

- DMCI 3 Public Open Space Provision
- DMCI 4 Open Spaces in New Development
- DMCI 5 Childrens Play Area
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DMEI 1 Living Walls and Roofs and Onsite Vegetation
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 11 Protection of Ground Water Resources
- DMEI 12 Development of Land Affected by Contamination
- DMEI 14 Air Quality
- DMEI 2 Reducing Carbon Emissions
- DMEI 3 Decentralised Energy
- DMEI 9 Management of Flood Risk
- DMH 1 Safeguarding Existing Housing
- DMH 2 Housing Mix
- DMH 7
- DMHB 1 Heritage Assets
- DMHB 10 High Buildings and Structures
- DMHB 11 Design of New Development
- DMHB 12 Streets and Public Realm
- DMHB 14 Trees and Landscaping
- DMHB 15 Planning for Safer Places
- DMHB 16 Housing Standards
- DMHB 17 Residential Density
- DMHB 18 Private Outdoor Amenity Space
- DMHB 4 Conservation Areas
- DMT 5 Pedestrians and Cyclists
- DMT 6 Vehicle Parking
- DMAV 1 Safe Operation of Airports
- LPP D1 (2021) London's form, character and capacity for growth

LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E9	(2021) Retail, markets and hot food takeaways
LPP G1	(2021) Green infrastructure
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG6	(2021) Increasing efficiency and resilience
LPP H10	(2021) Housing size mix
LPP H13	(2021) Specialist older persons housing
LPP HC1	(2021) Heritage conservation and growth
LPP S1	(2021) Developing London's social infrastructure
LPP S3	(2021) Education and childcare facilities
LPP SD6	(2021) Town centres and high streets
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI5	(2021) Water infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts

- LPP T5 (2021) Cycling
LPP T6 (2021) Car parking
LPP T6.1 (2021) Residential parking
LPP T6.5 (2021) Non-residential disabled persons parking
LPP T7 (2021) Deliveries, servicing and construction
LPP T9 (2021) Funding transport infrastructure through planning

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **30th November 2020**

5.2 Site Notice Expiry Date:- **30th November 2020**

6. Consultations

External Consultees

The application was consulted by neighbouring notification letters between 05-11-20 and 05-12-2020. A site notice was displayed and the proposal was advertised in the press. 50 responses were received which included 25 letters of objections, 18 letters of support and 7 comments.

Amended plans were consulted on between 11-03-2021 and 25-03-2021. 27 responses were received which included 13 letters of objections, 4 comments and 10 letters of support.

A valid petition was also received with 157 signatures in support of the application.

OBJECTIONS

Land Use

- Objection to the loss of the existing retail units. The loss of Halfords and Wickes would require local residents to travel further to access the goods and services provided by the existing shops making access to these goods and services unsustainable for existing residents and businesses.
- Objections to loss of retail jobs for local residents.
- Objections to the provision of cafes, restaurants and gyms.
- The site is not the right location for this type of development.
- The number of new apartments is unsustainable.
- The space for the nursery could be better used for a health centre.
- The development does not provide social housing.
- The proposal would result in increased pressure on public services.
- There is insufficient demand for this type of facility in the local area, there are currently vacant independent living facilities that are vacant in Uxbridge, Cowley and Ruislip.
- The units will not be affordable for the majority of local residents and the development would attract elderly residents from a wider area.
- The on-site cafe, restaurant and gym, this is likely to take trade away from Uxbridge town centre.
- Objections to the lack of contribution the development would make to the local economy and that most jobs created are likely to be minimum wage.
- Despite the in-house care available, the result could be a net increase of elderly people living in the Borough calling upon medical and social services which are already under severe pressure.
- The in-house care component of the proposal is inadequate and does not address the issue of elderly people with multiple medical needs.

Design

- Concerns relating to the scale and height.
- Concerns relating to the quantum of development proposed.
- The proposal would have a harmful visual impact.
- The proposal is out of keeping with the suburban residential character of this part of North Uxbridge.
- The tower also blights what is predominately a residential area.
- The site is on the extreme edge of the town and the height of the buildings change the balance of the town's sky line.
- It is not necessary to include one block of 8 storeys in height for a later living environment.
- A lower building mass is more appropriate for both future residents and to the greater amenity of North Uxbridge.
- The building should be reduced to 4 storeys.
- This is an over-intensive use of the site and fails to preserve or enhance the setting of the surrounding listed buildings, the Old Uxbridge/Windsor Street conservation area, surrounding locally listed buildings and the North Uxbridge area of special local character.
- The proposed 7 storey building is too high for this location.
- The proposal is an overly dense development out of keeping with the character of the area.
- The proposal would result in the over crowding of North Uxbridge.

Amenity

- Concerns relating to the impact of the proposal on daylight and sunlight.
- The proposal would result in overlooking into neighbouring properties.
- The proposal would have an overbearing impact on the amenities of neighbouring properties.
- Concerns about the increase in noise and disturbance.
- The proposal would create deep shadows.
- The buildings will reduce the sunlight and amount of visible sky, particularly in the winter months.
- The proposal would result in the loss of light.
- The proposal would impact one's ability to dry their laundry outdoors.
- Concerns relating to noise and disturbance during the construction period, the proposal would impact one's ability to work from home.
- Concerns the proposal will breach neighbouring fences.

Highways

- Insufficient car parking is provided;
- There is insufficient car parking available for visitors.
- No car parking provision have been made available for visitors to the wellness centre, restaurant, cafes and nursery.
- The proposal would displace car parking onto Harefield Road and surrounding streets.
- Concerns relating loading and unloading.
- The proposal would contribute to further congestion in Uxbridge.
- With the number of proposed residents, visitors, healthcare staff and deliveries, traffic and the requirement for parking is likely to increase.
- A car free development is unrealistic, to expect carers, visitors, residents and the workforce to use only public transport would not work in practice.
- Residents parking schemes are likely to be abused.
- There are already considerable pressure put on local parking facilities provided by Hillingdon Council to residents in the parking code area 'U1'.
- There are serious concerns over the safety and impact that vehicles would have at the location regarding the nursery element.

This proposal would give rise to considerable safety risk given the busy junction and increased traffic

flow due to the nursery.

- Concerns that elderly residents are unlikely to forgo use of their cars.
- The proposed ratio of car spaces at 1 per 2.43 dwellings is far too small, and needs at least to be doubled to be realistic.

Agent of Change

- Concerns relating to the impact of the development on the neighbouring Penfield Industrial Estate. The whole of the western boundary of Penfield Estate adjoins the subject planning application site. The introduction of significant noise sensitive residential uses immediately adjacent to the existing, lawful noise-generating employment uses at Penfield Estate will introduce the potential for complaints by residents in respect of these established industrial uses.

Sustainability

- It is unclear what green infrastructure and energy saving measures are proposed.
- Environmental concerns should prioritise retaining such shops in the local area rather than requiring locals to travel several miles to obtain services available at Halfords and Wickes.

Other Matters

- The local sewerage system is not capable of accommodating the scale of development proposed.
- The electricity supply is prone to breakdown in North Uxbridge is prone to breakdown during the winter months.
- The proposal would impact the value of neighbouring properties.
- Rights of light.

COMMENTS

- No objection in principle to the development or the innovative approach taken to enable older residents to down size;
- Any proposal at this site should be no more than 6 storeys in height.
- A car parking management scheme would need to be introduced along Harfield Road and surrounding streets;
- The car parking stackers are a good solution for car parking for elderly residents, the quantum should be increased.
- This is a better scheme than the previous application and the concept of the Guild Living scheme is positive, however there are reservations about its scale.
- The sensitive approach taken by the applicant is welcomed as is the scheme, however the loss of the existing retail units would have an impact on the retail offering in this part of Uxbridge and the 8-storey building appears to be too high for the area.
- Gyms over 500 sq.m are struggling in Uxbridge.

SUPPORT

The letters of support included letters from the Hillingdon Chamber of Commerce, Monkey Puzzle Nursery, Hillingdon Carers and Wellbeing Services. The letters of support are summarised below:

- Existing nursery is at full capacity with an eight month waiting list. There is a huge demand for quality nurseries within the Uxbridge area. Support for a children's day nursery within a later living community.
- Hillingdon carers support the proposal which include some excellent facilities planned for the site.
- Hillingdon Chamber of Commerce consider the proposed development will be a great use for the site so close to the town centre and it will help boost the town centre through increasing footfall and

spending and helping local businesses in the process.

- Support the plans to significantly enhance the area with new green spaces where residents and members of the public can relax. This would be a great way to encourage interaction between residents and visitors, something which is clearly at the heart of Guild Living's proposals.
- Impressed by the openness of their proposed later living community and look forward to using their facilities, such as the Wellness Centre, restaurant and library.
- Guild's proposed care services for Uxbridge will also help reduce pressure on the Hillingdon Hospital and other local NHS and Council services - especially given the town's ageing population.
- This scheme will help encourage downsizing and free up housing stock for families, in turn freeing up affordable housing for first-time buyers.
- Guild's attitude towards how we should age is truly unique and focuses on reinstating older people at the heart of our communities, helping to tackle the loneliness that many older people are experiencing.
- This scheme will benefit both those looking to live here, as well as the local community.
- Support the variety of high-quality homes for older people, from one-bed apartments to three-bed villas.

NORTH UXBRIDGE RESIDENTS ASSOCIATION - NOVEMBER 2020

The Guild Living proposal is an innovative approach, which would enable older people to downsize into an attractive setting with easy access to the town centre. It has 'stepped' levels of accommodation and care with an impressive range of facilities - both for residents and also open to the immediate community. The scheme has a varied building mass from 3,4 & 5 storeys on Harefield Road up to an 8 storey block at the rear. Accepting that we will lose two valuable local stores, this Scheme is a better alternative use for the site than any intensive residential or commercial development proposal with potentially greater bulk and height - which may bring little direct benefit to North Uxbridge. Feedback from residents has mainly been positive. Some residents remain concerned about bulk, height and adverse visual effect on North Uxbridge. This new type of Scheme could attract 'downsizers' from a wide area. Despite the in-house care available, the result could be a net increase of elderly people living in the Borough calling upon medical and social services already under severe pressure. After representations from NURA, the Site Owner (Legal & General) has agreed to increase to 25% the proportion of sales reserved to present Hillingdon residents in the first year. Guild Living tell us that it is necessary to include one block of 8 storeys in height. Our opinion is that, for a later living environment, a lower building mass is more appropriate for both future residents and to the greater amenity of North Uxbridge. They have supplied us with figures to justify the size needed to make the Scheme financially viable and have given detailed answers to our questions. We welcome their openness, but we do not have access to the independent third-party appraisal of viability which Hillingdon Council will no doubt be undertaking. We have concern about a traffic issue: Guild have included a large pre-school nursery to provide inter-generational stimulus within the resident community. Although the Scheme is estimated to produce less car movements overall than the current use, a concentration of drop-off/pick up car movements for the nursery at peak times could disrupt traffic flows at this busy part of Harefield Road next to the Police Station.

CONCLUSION: Overall, it is our collective view that North Uxbridge Residents Association supports this Scheme, but with reservations.

NORTH UXBRIDGE RESIDENTS ASSOCIATION - MARCH 2021

- These comments are supplemental to those made by North Uxbridge Residents Association on the original Guild Living Planning Application. NURA expressed support for the Application, but with reservations mainly concerning the height of the 8 storey block. Since that time NURA has held discussions with Guild and we are pleased to note that Guild have now taken our concerns on board in the amended Application by:

- Reducing the height of the tallest building from 8 to 7 storeys by reducing the number of apartments from 194 to 182.
- Removing a top part of the building along Harefield Road to create stepped massing up to 5 storeys.
- Setting back the building, offering space for landscaping and tree planting along Harefield Road.

NURA supports the amended Planning Application, without qualification.

PETITIONS

A petition was received in March 2021 with 157 valid signatures. The petition supports the delivery of a new nursery as part of the proposed development.

STATUTORY CONSULTEES

DENHAM PARISH COUNCIL - NOVEMBER 2020

As a neighbouring Parish Council we have concerns about the highway infrastructure around this site and potential impact on roads just over the border in Denham and Buckinghamshire.

DENHAM PARISH COUNCIL - MARCH 2021

There will be public retail, nursery and gym with little or no parking. DPC has strong concerns on the impact of the local road network in particular the A4020 to the M40 through New Denham which is not considered on the travel plan.

BUCKINGHAMSHIRE COUNCIL

This Council has considered the above application and raises NO OBJECTION to the application subject to your authority ensuring that the proposal complies with all relevant policies contained in the adopted Development Plan and guidance contained in the National Planning Policy Framework.

ENVIRONMENT AGENCY

We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in our Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals. The previous land use at this site suggests the potential presence of contamination. Since the site is situated on a principal aquifer these proposals need to be dealt with in a way which protects the underlying groundwater. Please therefore take note of the following advice. Where land contamination may be an issue for a prospective development we encourage developers to employ specialist consultants/contractors working under the National Quality Mark Scheme.

NATURAL ENGLAND

Natural England has no comments to make on this application.

GLAAS

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

NPPF Section 16 and the Draft London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The planning application lies in an area of archaeological interest. The applicant's archaeological desk-based assessment shows that remains of a Bronze Age settlement and land boundary ditches were found during an investigation conducted in 1993-4. These are part of an extensive Bronze Age landscape covering much of the Lower Colne Valley. There appears to be a trackway aligned on the natural crossing point over the Colne at the site of the medieval bridge. The eastern and central parts of the site were investigated and ground levels subsequently reduced so there is very limited potential in these areas. However, the western part of the site was not investigated and may have greater surviving potential. Any surviving remains would be harmed by the proposed new build.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

NPPF paragraphs 185 and 192 and Draft London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

I therefore recommend attaching a condition as follows:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- B. Where appropriate, details of a programme for delivering related positive public benefits.
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative

Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Stage 1 of the proposed condition would involve trial trenching in the western part of the site to establish what buried remains survive. If significant survival is demonstrated then an open area excavation is likely to be necessary in the affected area under stage 2 of the condition before development commences.

HEATHROW AERODROME SAFEGUARDING

We have now assessed the below application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, we would like to make the following observation:

Construction Aviation Warning Lights

Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or Radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omni-directional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane.

MINISTRY OF DEFENCE

The application site falls within the aerodrome height and birdstrike statutory safeguarding zones surrounding RAF Northolt, lying approx. 3.8km West from the centre of the airfield.

Aerodrome Height safeguarding zone

The proposed development site occupies the statutory height safeguarding zone which ensures air traffic approaches are not impeded. The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre. Having reviewed the

proposal, I can confirm the MOD has no concerns regarding the height of the proposed development.

Birdstrike safeguarding zone

Within this zone, the principal concern of the MOD is the creation of new habitats may attract and support populations of large and/or flocking birds close to aerodromes. The principal concern of the MOD with this development is the proposed flat green roofs including roof gardens, sedum and wild flower roofs. Flat roofs have the potential to attract and support breeding large gulls, therefore the MOD recommend a flat roof Bird Hazard Management Plan (BHMP) be put in place to prevent the breeding of large gulls, as follows:

The BMP should make a provision for the site managers/maintenance to undertake or organise bird control (using appropriate licensed means) which would address any population of gulls or other bird species occupying the flat roofs which are considered by the MOD to be a hazard to air traffic using RAF Northolt, to disperse as many as necessary in order to prevent them from successfully breeding at the site. To facilitate this, it will be necessary to ensure the roofs are accessible for personnel engaged in the bird control activities.

Cranes

The MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect the performance of air traffic safety. If the redevelopment of this site does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures.

The MOD would request that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting).

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

Subject to the above conditional requirements being implemented as part of any planning permission granted, the MOD maintains no safeguarding objection to this application.

NATS

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

THAMES WATER

Waste Comments

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

GREATER LONDON AUTHORITY

Principle of Development

The site is located within Uxbridge Metropolitan Town Centre and comprises two large footprint single storey retail warehouse buildings with approximately half of the site used for surface car parking. As such, the site falls within the category of low density retail sites which London Plan Policies 3.3 and 2.15, and Policies H1 and SD6 of the Intend to Publish London Plan encourage the comprehensive mixed use redevelopment of to enable the provision of high density residential and mixed use development in accessible locations, whilst also supporting the overall vitality of town centres.

The proposed scheme would result in a loss of retail floorspace, with the existing retail buildings comprising 3,355 sq.m. of floorspace replaced by small-scale commercial, leisure and community uses at ground floor level. These non-residential uses would help to animate the proposed new street and public space and appropriate in scale given the site's location and would also complement the proposed specialist housing for older people. As such, the loss of retail floorspace is acceptable in this instance and does not raise any strategic planning concerns.

London Plan Policy 3.8 and Policy H13 of the Intend to Publish London Plan emphasise the importance of increasing the provision of specialist housing for older people in view of London's demographic changes and housing needs, to improve the quality of the existing stock across London and to encourage downsizing. To address these aims, the London Plan and Intend to Publish London Plan provide indicative benchmarks for specialist housing provision for older people (which for Hillingdon are 155 to 180 residential units per annum, respectively). The provision of specialist accommodation for older people in this accessible town centre location is therefore supported and would also contribute towards meeting the overall housing targets set out in the London Plan and Intend to Publish London Plan, with all units of accommodation counted as contributing towards meeting these targets on a 1:1 basis as clarified by paragraph 4.1.9 of the Intend to Publish London Plan.

The provision of a nursery is strongly supported, in accordance with London Plan Policy 3.16 and Policies S1 and S3 of the Intend to Publish London Plan as it will introduce additional uses into this accessible town centre location.

In summary, the principle of the proposed residential-led mixed use redevelopment of this underutilised town centre site to provide specialist housing and care home accommodation for older people, a nursery and small scale retail units is supported and accords with London Plan Policies 2.15, 3.3, 4.7, 4.8 and Policies H1, SD6 and SD8 of the Intend to Publish London Plan.

Affordable Housing

London Plan Policies 3.11 and 3.12, and Policy H4 of the Intend to Publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H5 of the Intend to Publish London sets a minimum threshold of 35% affordable housing (by habitable room), with a higher 50% threshold applied to public sector owned sites and industrial sites where there is a net loss of industrial floorspace capacity. This application is subject to the 35% threshold as it is a privately owned retail site.

Specialist Housing Accommodation for Older People

Policy H13 of the Intend to Publish London Plan states that specialist housing developments for older people should deliver affordable and accessible housing, incorporate the highest standards of inclusive design and include suitable internal storage facilities and pick up and drop off parking provision. Policy H13 does not apply to care home accommodation, which is not subject to planning policy requirements for affordable or accessible housing. Policy H13 does not seek to define or distinguish care home accommodation from other forms of specialist housing for older people on the basis of the Use Classes Order or by reference to Class C2 or C3 uses. Instead, the policy defines care home accommodation as having certain specific attributes in terms of the needs of occupants and the way it is managed.

In summary, care home accommodation is defined as providing accommodation for people who require nursing or personal care and where there is no separation between the personal care and the accommodation provided. Residents within care home accommodation would not be able to choose to receive personal care from another provider, with it being provided in-house. In contrast, specialist older persons housing comprises accommodation that has been specifically designed and managed for older people, but where residents would have a choice as to who provides their care which would be secured via separate contracts/agreements and not specifically linked to the accommodation itself. Whilst this latter form of accommodation is subject to Policy H13 and should provide affordable housing, care home accommodation is not subject to Policy H13 and is not required to provide affordable housing. This approach was endorsed by the London Plan EiP Panel.

The applicant has stated that all of the proposed residential units would fall within Class C2 use as it will provide specialist residential accommodation and care to people who need care, which would be an eligibility requirement for residents. The applicant has suggested that the proposed use should be secured by condition and the minimum care provision should be secured by a Section 106 planning obligation. Should planning permission be granted, such conditions and obligations should be secured.

To support its view regarding the Class C2 use, the applicant cites Planning Practice Guidance which states that when determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration should be given to the level of care and scale of communal facilities provided. It also cites the recent High Court decision of Rectory Homes Ltd v Secretary of State for Housing Communities and Local Government in 31 July 2020 (Case No: CO/4682/2019) which has implications for proposals for specialist housing accommodation schemes for older people and the interpretation of Use Classes C2 and C3. This concluded that the term "residential accommodation" in Class C2 can potentially include residential properties with the physical characteristics of dwellings, such as independent flats and bungalows, providing care is provided for residents in need of such care.

GLA officers have reviewed this decision and do not accept that it undermines the requirements of Policy H13 as set out above, rather it aligns with the approach established by Policy H13, which moves away from a reliance on the Use Class Order when defining specialist older persons housing as distinct from care home provision and instead seeks to distinguish these forms of housing on the basis of the type of care being provided.

The applicant's scheme includes three types of accommodation, which it has summarised below as being:

- Guild Living Residences (161 units);
- Guild Care Residences (7 units); and
- Guild Care Suites (26 units).

No on-site affordable housing is however proposed in respect of the 161 Guild Living units. Instead, the applicant has proposed a £2 million payment in lieu towards the provision of affordable housing off-site. The application is following the Viability Tested Route and a Financial Viability Appraisal (FVA) has been submitted which is currently being scrutinised by both GLA officers and the Council's independent assessors to ensure that the scheme would deliver the maximum viable level of affordable housing. The applicant's FVA has been undertaken by Avison Young and concludes that the proposed development would generate a gross development value (GDV) of £105.43 million, set against overall development costs of £94.88 million. This results in a net profit of £11.46 million which equates to 10.8% profit on GDV, which the applicant does not consider to be commercially viable. Despite this being below the applicant's stated target profit level, the applicant has stated that it is still willing to provide a £2 million cash in lieu payment towards the provision of off-site affordable housing. At this stage, GLA officers are not in a position to validate the assumptions or conclusions in the FVA as the assessment process is being undertaken. Full details of the GLA's in-house viability team's review of the applicant's FVA will be provided to the Council and applicant in due course and should feed into the Council's independent assessment.

The London Plan, Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG strongly encourage affordable housing to be provided on-site to support mixed and inclusive communities. This principle also applies to specialist housing accommodation for older people. For off-site affordable housing to be considered acceptable, an applicant must demonstrate exceptional circumstances which mean that affordable housing cannot be delivered on-site and that there would be benefits in terms of affordable housing delivery. The Mayor's Affordable Housing and Viability SPG further states that viability alone is an insufficient justification for off-site affordable housing provision or a cash in lieu payment. The applicant has not sufficiently explained or justified why on-site affordable housing cannot be provided, given that there are separate blocks and cores within the scheme and on-site affordable housing would therefore be possible.

Furthermore, for a cash in lieu payment to be acceptable, it would need to be shown that any such payment would be ring fenced and spent within a defined timescale as part of a credible and achievable affordable housing programme, with a pipeline of potential donor sites set out demonstrating where the payment could be allocated to ensure the delivery of additional affordable housing. This information has not been provided. GLA officers are also not aware of any Hillingdon Council affordable housing programme which would enable the cash in lieu payment to be spent in this way. It is also unclear how the £2 million payment equates to on-site affordable housing, or the number of additional affordable homes this would theoretically deliver. This information should be provided. Based on an initial estimate, this would provide approximately 8 residential units.

In summary, for the above reasons, the principle of the applicant's cash in lieu payment is not currently supported and detailed discussion is required to understand the rationale for the offsite affordable housing proposals; and, should this be accepted, to verify that the agreed cash payment would provide the maximum viable level of affordable housing the scheme could support. In line with the Viability Tested Route, early and late stage review mechanisms would need to be secured via a s106 agreement. The applicant's FVA and Council's independent assessment should be also published in accordance with the transparency requirements set out in the Mayor's Affordable Housing and Viability SPG.

Housing Choice and Size Mix

London Plan Policy 3.8 and Policy H10 of the Intend to Publish London Plan state that new development should generally consist of a mix of housing sizes and types to meet housing demand and address the needs of different groups. The need to address the varied housing requirements of older people is also recognised, as well as the need to encourage downsizing and the potential this has to help free up family sized housing within the existing housing stock.

The proposed housing mix is set out below and includes provision for one, two and three bedroom units within the Guild Living Residences, which is supported. Flexibility is applied to the unit size mix in this instance, given the specialist nature of the accommodation which is for older people and would therefore not necessitate family sized accommodation (3 bedrooms and more in size). The proposal for specialist older persons housing and care home accommodation would promote housing choice, enable downsizing to free-up larger family sized homes and would also address demand for specialist accommodation. As such, the proposals accord with Policy 3.8 and H10 and are supported.

Design, Layout, Public Realm and Landscaping

London Plan Policies 7.1 to 7.5, together with Policies D1-D3 and D8 of the Intend to Publish London Plan and the Housing SPG (2016) apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages and improving permeability and overlooking.

The overall design and layout of the scheme is supported and responds positively to the urban design requirements and principles set out above. A stronger development frontage would be created along Harefield Road with active residential frontages, including communal core and individual front door entrances set behind a landscaped front boundary. The permeability and legibility of the site would be significantly improved through the provision of a new tree lined street running parallel to the

adjacent Police Station to the south which would enhance wider connectivity to the town centre. This route would be activated appropriately by cafe, leisure and internal communal residential and community uses, with planting incorporated successfully alongside car parking to provide a high quality, attractive entrance route into the site linking through to the town centre.

The potential for the Police Station to come forward in the future was discussed at pre-application stage, albeit there are currently no proposals. The layout, design and massing of the applicant's scheme successfully addresses this important interface and would not compromise the potential for the adjacent Police Station to be developed in the future, which is welcomed.

The provision of a central public courtyard is strongly supported and the proposed hard and soft landscaping and planting strategy for this space is well-considered. The proposal to incorporate a nursery into this section of the scheme is also strongly supported and would allow informal mixing between different age groups within the public open space and landscaped courtyard, drawing the public and wider community into the site. This inter generational place making approach is strongly supported.

The provision of a private communal landscaped corridor wrapping round the site boundary is supported and would enhance the existing tree line and provide a buffer to the surrounding properties. This route would be overlooked by ground floor private terraces within the scheme and provide a good outlook for these units. As set at pre-application stage, a clearly defined threshold is required at the entrances to this route to define this space as private and distinct from the surrounding public realm

and an appropriate level of on-site management is required, particularly after dark, to address

potential safety and security issues.

Optimising Development Capacity and Residential Density

London Plan Policy 3.4 seeks to optimise housing density, with Policies D1 to D4 of the Intend to Publish London Plan placing greater emphasis on a design-led approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. The application would have a net residential density of 208 units per hectare, Overall, taking into account the site location, PTAL, and surrounding context and the characteristics of the proposed development, GLA officers consider that the site lends itself to the provision of a comprehensive well-designed high density residential scheme and that the overall development capacity of the site has been appropriately optimised as part of a design-led approach.

Residential Quality

Policy D6 of the Intend to Publish London Plan states that minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all residential accommodation that is self-contained. Care home accommodation is not subject to these standards as it is not self-contained housing.

Private amenity space should normally be provided for upper floor flats in the form of balconies, unless exceptional circumstances are demonstrated which would mean that balconies cannot be provided. Where this is the case, the required quantum of space should be provided within the dwelling as mitigation and compensation. The 2016 Housing SPG sets out benchmark unit per core per floor ratios. In addition to these quantitative standards, the provision of dual aspect units should be maximised and single aspect units only provided where such units would result in a better design solution and site optimisation. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating and noise should also be appropriately addressed.

The 161 Guild Living Residences which are studio, 1-bedroom, 2-bedroom and 3-bedroom sized self-contained residential units and would all exceed minimum internal space standards. However, the majority of units would not have private amenity space and would also be single aspect, with high unit to core ratios.

The need for appropriate and high housing standards was discussed in detail at both GLA pre-application meetings and GLA officers maintain their position that the housing quality standards in the London Plan and Intend to Publish London Plan are applicable to all forms of self-contained housing. However, the overall design approach and non-compliance with these standards could be accepted in this particular instance, noting that the applicant is proposing specialist accommodation for older people which would be subject to high levels of on-site management and a wide range of internal and external communal facilities are proposed. There site also has specific design constraints which may also preclude balconies facing directly onto and overlooking rear gardens to the north, as well as townscape constraints along Harefield Road. As such, an appropriate degree of flexibility can be applied in this instance.

Height and Massing

The height and massing of the scheme is supported and has been appropriately refined and staggered to take account of its residential, heritage and townscape context, which has been assessed in detail as part of the applicant's heritage and townscape assessment. The revised massing for the linear block adjacent to the Police Station is supported and ensures a more stepped and recessed approach which provides an improved transition between the scheme and the townscape context on Harefield Road. Overall, the height and massing proposed is considered

appropriate in view of the site's surrounding context and town centre location and does not raise any strategic planning concerns. The application complies with London Plan Policy 7.7 and 7.4 and Policy D9 of the Intend to Publish London Plan.

Architectural Quality and Materials

The architectural and material quality of the proposed scheme is strongly supported and responds positively to its context, with different shades and textures of red brick proposed, alongside corrugated dark brown aluminium cladding and window frames. The overall effect is to provide a distinctive, attractive and visually cohesive scheme in which the detailing and level of articulation of the proposed facades and elevations would be of a high standard.

Heritage Impact

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". In relation to conservation areas, special attention should be paid to the desirability of preserving or enhancing the character of conservation areas when making planning decisions.

The NPPF states that when considering the impact of the proposal 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the 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. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In line with case law, any harm identified must be given considerable importance and weight. 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. London Plan Policy 7.8. and Policy HC1 of the Intend to Publish London Plan state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.

As set out above, the heritage context is relatively sensitive, given the site's close proximity to the Old Uxbridge/Windsor Street Conservation Area and the statutory listed buildings set out above, as well as the Magistrates Court to the north which is locally listed and Fassnidge Park to the west, which is within the Rockingham Road Conservation Area. The Uxbridge Lock Conservation Area is to the north-west.

The applicant's Heritage Townscape and Visual Impact Assessment (HTVIA) demonstrates that the proposed scheme would not impact the vast majority of the designated heritage assets and townscape views assessed. However, Views G taken from the Uxbridge Lock Conservation Area shows that the proposed buildings would alter the setting of the conservation area and Grade II listed Bridge 184, with the upper sections of the proposed buildings visible in the distant skyline above the tree line. This would result in minor less than substantial harm, which would be at the lower end of the scale of less than substantial harm, given the overall impact and distance involved. View K of the HTVIA shows that the proposed scheme would impact the Grade II listed 118 Uxbridge High Street which falls within the Old Uxbridge/Windsor Street Conservation Area. The proposed development would form an attractive backdrop with appropriate materials selected, providing a significant

townscape improvement on the existing Police Station building which negatively impacts the setting of the Grade II listed building. However, the proposed buildings would merge with the roofline of the Grade II listed 118 Uxbridge High Street. This would cause less than substantial harm to the Grade II listed 118 Uxbridge High Street and the Old Uxbridge/Windsor Street Conservation Area. This would be on the lower end of the scale of less than substantial harm, given the existing and proposed context and taking into account the overall significance of the heritage asset and the contribution made by its setting. Notwithstanding this, as harm is identified, this must be clearly and convincingly outweighed by public benefits in this case. Whilst the provision of care accommodation and specialist housing for older people could comprise a public benefit which would be taken into account, alongside other public benefits such as pedestrian and public realm improvements and affordable housing provision. Should planning permission be issued, these public benefits will need to be fully set out for further consideration at Stage 2 and secured via s106 agreement.

Inclusive Access

London Plan Policy 7.2 and Policy D3 of the Intend to Publish London Plan seek to ensure that new development achieves the highest standards of accessible and inclusive design. Policy 3.8 of the London Plan and Policy D5 of the Intend to Publish London Plan require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The scheme would comply with these requirements and therefore accords with the London Plan and Intend to Publish policies on inclusive design and accessible housing, subject to these requirements being secured by condition.

Fire Statement

A fire statement has been provided which has been undertaken by qualified third party assessor, in accordance with Policy D12 of the Intend to Publish London Plan. This details how appropriate fire safety measures have been incorporated in the proposed design, layout, construction of the development, including means of fire detection and suppression, means of escape and access for emergency services.

Climate Change

The applicant's proposed energy strategy would ensure a 43% reduction in CO₂ emissions over and above baseline Building Regulations requirements on the residential (domestic) element of the scheme, of which, 10% would be achieved through energy efficiency measures. The non-domestic element of the scheme would achieve a 67% reduction in CO₂ emissions over and above baseline Building Regulations, of which, 12% would be achieved through energy efficiency measures. This exceeds the minimum on-site targets for CO₂ emissions and energy efficiency performance which are set out in the Intend to Publish London Plan and London Plan. The applicant's energy strategy comprises a range of passive design and energy efficiency measures, Air Source Heat Pumps and 200 photovoltaic solar panels (PV) at roof level. The applicant's overheating assessment is acceptable and the risk of overheating has been addressed through a range of passive measures, including additional external shading, solar control glazing and through a Mechanical Ventilation Heat Recovery system. The applicant has stated that there are no existing or planned district heating networks within the vicinity of the proposed development, which should be verified. The scheme should be future proofed to ensure the potential to connect to a district heat network in the future. The overall energy strategy is supported. The remaining shortfall in CO₂ reductions to comply with the zero carbon target should be secured via a carbon offset payment.

Flood Risk and Sustainable Urban Drainage

The site is located within Flood Zone 1 and generally has a low and very low risk of surface water flooding according to Environment Agency flood risk maps. A range of sustainable urban greening (SuDs) measures are proposed as part of the development including green / brown roofs, soft landscaping and shrub, tree and herbaceous planting areas, permeable paving and below ground storage attenuation tanks to provide the required quantum of surface water run-off storage attenuation capacity (295 cubic metres of attenuation). This is acceptable and complies with the London Plan drainage hierarchy, taking into account the development constraints and building footprint in this instance. As such, the application complies with the relevant policies in the London Plan and Intend to Publish London Plan.

Urban Greening and Trees

London Plan Policy 7.19 promotes the protection and enhancement of biodiversity and states that new development should realise the opportunities for positive biodiversity gains. London Plan Policy 5.10 and Policy G5 of the Intend to Publish London Plan require new development to contribute towards urban greening. London Plan Policy 7.21 and Policy G7 of the Intend to Publish London Plan require development proposals should ensure that, wherever possible, existing trees of value are retained and that the loss of trees as a result of development is mitigated through the provision of replacement trees of an adequate value.

A number of trees would be removed as part of the proposed development including the semi-mature London Plane and Horse Chestnut trees located at the site entrance and frontage on Harefield Road and within the existing car park. Some of the trees along the north-western site boundary would be retained. No Category A trees exist on the site and the majority of trees proposed for removal would be Category C (21 trees), with two Category B trees removed. Taking into account the site constraints and overall strategic objective for high density residential redevelopment in this under-utilised retail warehouse site within a town centre site, GLA officers consider that the loss of trees would be justified in this particular instance and could be appropriately mitigated through compensatory tree planting (69 new trees), as set out in the applicant's tree plan and landscape strategy which proposes a range of replacement trees of an appropriate maturity. This should be secured.

A range of urban greening measures are proposed within the applicant's landscape strategy including lawns, herbaceous and hedge planting areas, trees, a wildflower / biodiverse green roof and a sedum brown roof, with permeable paving areas and landscaping interspersed between car the on-street car parking spaces. This approach is supported and maximises the potential for urban greening, taking into account the site size and the development density constraints. An urban greening factor (UGF) assessment has not been undertaken for the proposals which should be provided to confirm the level of compliance with the Intend to Publish London Plan Policy G7 and 0.4 target.

Transport

In line with Policy T1 of the Intend to Publish London Plan, developments within London should support the Mayor's modal shift targets set out in the London Transport Strategy, with the Mayor setting an overall target of 80% of journeys to be made by walking, cycling and public transport. To support this, outer London is expected to have a sustainable mode share of 75% and 90% in inner London.

Car parking

The application proposes 80 residential car parking spaces, which equates to a residential car

parking ratio of 0.5 spaces for each of the 161 Guild Living Residences. This significantly exceeds the maximum car parking standard set by Policy T6 of the Intend to Publish London Plan. Given the high PTAL of the site, there are good opportunities for residents to travel via sustainable modes of transport. The Intend to Publish London Plan expects that residential schemes in this location should be car-free with the exception of Blue Badge car parking. Appropriate provision for electric vehicle charging facilities should be made in line with the Policy T6 of the Intend to Publish London Plan which requires active electric vehicle charging points for 20% of all parking spaces, with passive provision provided for the remainder.

At pre-application stage, the applicant was requested to provide appropriate evidence to justify the proposed level of car parking. The applicant justified its approach by reference to Hillingdon Council requirements and that the majority of future occupants will be downsizing from larger dwellings away from the town centre, so may currently be reliant on private cars, noting existing car ownership patterns. The need to retain the independence of residents is also cited. It is also noted that the previous application was refused for various reasons which included inadequate car parking provision. Hillingdon's Local Plan (2020) sets a maximum car parking standard of 1 space per four dwelling units for care home accommodation for older people and between 1 space per unit for 1 and 2-bedroom flats. Whilst these issues are recognised, it should also be noted that the site is within Uxbridge Metropolitan Town Centre and benefits from PTAL 5 with close proximity to public transport facilities and town centre amenities and services. Therefore, the car parking should be reduced to support the mode share objectives set out in the Intend to Publish London Plan and Mayor's Transport Strategy. It is considered that a car club, which is not currently proposed, would be well suited to this development.

Parking would be provided at ground level under a podium in a double-banked stacker arrangement to optimise space and limit the amount of space required for car parking. Residents would drop their cars to either a covered entrance or one of the 5 dedicated temporary valet spaces and provide their keys to the valet staff who would then park the car. The same arrangement will be used when collecting cars. This complies with disabled car parking requirements. However, clarification should be provided to confirm whether the double stackers are appropriate for adapted (wheelchair accessible) cars as these normally have larger dimensions in terms of height. In addition to the covered podium parking for residents, five visitor car parking spaces are proposed, together with two staff spaces and a space for use by the nursery. The non-residential elements of the development should be provided with at least one disabled parking space in accordance with Intend to Publish London Plan Policy T6.5. Once agreed, design and management arrangements would need to be secured via a Car Parking Design and Management Plan. To minimise overspill parking and promote sustainable travel, a Section 106 obligation that prevents residents from obtaining permits to park in the local CPZ should be secured.

Cycle parking

Long-stay and short-stay cycle parking has been provided based on a C2 use within Table 10.2 of the Intend to Publish London Plan. However, this should be revised to ensure compliance with the minimum standard for specialist older persons accommodation as required in page 472 of the Intend to Publish London Plan. Once revised, all cycle parking spaces should be located in secure and accessible locations and designed in accordance with the London Cycle Design Standards (LCDS). The LCDS states that 5% of cycle parking spaces stands ought to be able to accommodate larger cycles. The easiest way to meet accessibility requirements on types of cycle parking, as well as serve different user needs generally is to provide a mix of types of cycle stands, preferably including Sheffield stands. The currently proposed two-tier racks are not considered appropriate for use of many residents. Showers, changing rooms and lockers are recommended for staff. Mobility scooter parking is also proposed, which is welcomed. However, a larger store should be provided to enable easy access to all scooter spaces. Safe access to the row of cycle parking adjacent to the proposed loading bay is a concern, with respect to Vision Zero. An alternative

location should therefore be proposed, where the cycle parking would be overlooked and conveniently located closer to building entrances.

Site access and walking and cycling improvements

Site access improvements are proposed on Harefield Road at the existing site access and at the junction of Warwick Place and Harefield Road. The site access from Harefield Road will be narrowed with improved dropped kerbs and tactile paving. The junction at Warwick Place and Harefield Road would also be improved with improved dropped kerbs and tactile paving. These junction improvements would improve pedestrian access from and along Harefield Road in line with ItP London Plan Policy T2 (Healthy Streets). As set out above, the public realm and landscaping of the new street connecting Harefield Road and Warwick Road is supported. The improvements have been assessed using the Healthy Streets check for designers which is welcomed. However, the proposed footway is only 1.2m in width and should be widened to prevent pedestrians stepping out onto the carriageway. The route should be provided with street lighting to provide safety in hours of darkness, and appropriate wayfinding would be welcomed. The applicant's Transport Assessment includes an Active Travel Zone assessment and review of accidents. The deficiencies in the local walking / cycling environment that are identified should be addressed through planning obligations and improvements to the nearby walking and cycling network.

Public transport impact and mitigation

The trip generation assessment should be revisited. The anticipated mode shares are not considered reflective of the site location and PTAL. A revised public transport trip generation and impact assessment is therefore required.

Deliveries and servicing, construction and travel plan

A delivery and servicing plan, construction logistics plan and travel plan should be secured.

Conclusion

London Plan and Intend to Publish London Plan policies on retail and town centre uses; housing supply; specialist housing for older people; housing and affordable housing; urban design; residential quality; density; heritage; inclusive access; energy; sustainable urban drainage; urban greening and trees; and transport are relevant to this application. The application does not comply with the London Plan and the Intend to Publish London Plan, as set out below:

- Principle of development: The principle of the proposed residential-led mixed use redevelopment of this underutilised town centre site to provide specialist housing and care home accommodation for older people is supported and accords with London Plan and the Intend to Publish London Plan.
- Housing and affordable housing: The application does not provide any on-site affordable housing. Instead a £2 million cash in lieu payment is proposed. Exceptional circumstances to justify off-site affordable housing provision have not been demonstrated. No detail has been provided of the affordable housing the proposed cash in lieu payment would provide and how it would be spent to ensure delivery within an agreed timescale. The principle of a cash in lieu payment is therefore not currently supported. The applicant's Financial Viability Appraisal (FVA) is being scrutinised to ensure that the maximum viable contribution towards affordable housing provision is provided. Early and late stage viability review mechanisms are required.

Urban design and heritage: The design, layout, height and massing is supported. The residential quality does not fully comply with the standards in the Intend to Publish London Plan. However, a degree of flexibility could be acceptable given the specialist nature of the housing proposed. The

application would cause less than substantial harm to a number of designated heritage assets which must be clearly and convincingly outweighed by public benefits associated with the application.

Climate change: The energy, drainage and urban greening strategies are supported. The loss of trees is justified and could be appropriately mitigated. An urban greening factor assessment should be provided.

Transport: The residential car parking is excessive given the town centre location and PTAL (5). This should be reduced. Cycle parking for the specialist housing for older people does not comply with the minimum standard in the Intend to Publish London Plan and should be increased. The design of cycle parking should comply with the London Cycle Design Standards. Healthy streets and active travel zone improvements should be secured. The trip generation assessment should be revised.

TRANSPORT FOR LONDON

Car Parking

The application proposes 80 residential car parking spaces, which equates to a residential car parking ratio of 0.5 spaces for each of the 161 Guild Living Residences. This significantly exceeds the maximum car parking standard set by Policy T6 of the Publication London Plan. The Publication London Plan requires residential schemes in this location to be car-free, with the exception of Blue Badge car parking. Given the high PTAL of the site there are good opportunities for residents to travel via sustainable modes of transport, especially considering residents would have access to free travel on public transport. Further, the site is within Uxbridge Metropolitan town centre with easy access to amenities and facilities and benefits from quality surrounding walking / cycling infrastructure. Therefore, all general car parking should be removed to support the Mayor's overall target for 80% of all trips to be made by active modes or public transport by 2041 (Publication London Plan Policy T1). It is considered that a car club, which isn't currently proposed, is well suited to this development in lieu of general parking. A car club would cater for infrequent trips by residents made further afield. TfL note that congestion, emissions and public health are challenges facing our city that span administrative boundaries and all boroughs must contribute to addressing them. Further, Uxbridge town centre has been identified as a Focus Area for improving air quality (Hillingdon AQAP, 2019-2024); therefore, the development is expected to contribute towards this.

In accordance with Policy T6.1 of the Publication London Plan, the residential care development should provide at least 5 Blue Badge parking spaces from the outset (equivalent to 3% of dwellings), and it should be demonstrated that a further 12 spaces could be provided in future should demand arise (equivalent to 7% of dwellings). It would be appropriate to provide the total requirement (17 spaces) from the outset as there is likely to be demand from residents. Further, all non-residential elements of the development should be provided with at least one Blue Badge parking bay in accordance with Publication London Plan Policy T6.5. Appropriate provision for electric vehicle charging facilities should be made in line with the Policy T6 of the Publication London Plan which requires active electric vehicle charging points for 20% of all parking spaces, with passive provision provided for the remainder.

Parking is currently proposed at ground level under a podium in a double-banked stacker arrangement to optimise space and limit the amount of space required for car parking. Residents would drop their cars to either a covered entrance or one of the five dedicated temporary valet spaces and provide their keys to the valet staff who would then park the car. The same arrangement would be used when collecting cars. In addition to the covered podium parking for residents, five visitor car parking spaces are proposed, together with two staff spaces and a space for use by the nursery. It has not been demonstrated that the double stackers and valet spaces are appropriate for adapted (wheelchair accessible) cars, as these normally have larger dimensions in terms of height.

Once the parking quantum has been agreed, design and management arrangements would need to be secured via a Car Parking Design and Management Plan. To minimise overspill parking and promote sustainable travel, a Section 106 agreement that prevents residents from obtaining permits to park in the local CPZ will be required.

Cycle Parking

Long-stay and short-stay cycle parking for the residential care development has been incorrectly provided based on a C2 use within Table 10.2 of the Publication London Plan. This should be revised to ensure compliance with the minimum standard for specialist older persons accommodation as required in page 472 of the Publication London Plan. The applicant should also confirm FTE staff numbers and GEA figures as appropriate for the non-residential elements in order to confirm compliance with the Publication London Plan minimum standards. Once revised, all cycle parking spaces should be located in secure and accessible locations and designed in accordance with the London Cycle Design Standards (LCDS). The LCDS states that 5% of cycle parking spaces stands ought to be able to accommodate larger cycles. The easiest way to meet accessibility requirements on types of cycle parking, as well as serve different user needs generally is to provide a mix of types of cycle stands, including Sheffield stands. The currently proposed two-tier racks are not considered appropriate for use of many residents. Showers, changing rooms and lockers are recommended for staff. Mobility scooter parking is also proposed, which is welcomed. However, a larger store should be provided to enable easy access to all scooter spaces. Safe access to the row of cycle parking adjacent to the proposed loading bay is a concern, with respect to Vision Zero. An alternative location should therefore be proposed, where the cycle parking would be overlooked and conveniently located closer to building entrances.

Walking and Cycling

Site access improvements are proposed on Harefield Road at the existing site access and at the junction of Warwick Place and Harefield Road. The site access from Harefield Road will be narrowed with improved dropped kerbs and tactile paving. The junction at Warwick Place and Harefield Road would also be improved with dropped kerbs and tactile paving. These junction improvements would improve pedestrian access from and along Harefield Road in line with Publication London Plan Policy T2 (Healthy Streets). These works should be secured through a s278 agreement.

The public realm and landscaping of the new street connecting Harefield Road and Warwick Road (and onwards to the town centre) is supported. The improvements have been assessed using the Healthy Streets check for designers, which is welcomed. However, the proposed footway is only 1.2m in width and should be widened to ensure pedestrians can safely pass one another and prevent them stepping out onto the carriageway. It is not considered that the current width would safely accommodate the expected level of pedestrian trips. The route should be provided with street lighting to provide safety in hours of darkness, and appropriate wayfinding would be welcomed. It is considered that cycle movements could be safely accommodated on the carriageway.

The provision of the publicly accessible courtyard is welcomed. This provides seating, tree planting and green space in line with the 10 Healthy Streets indicators. It is welcomed that bollards will prevent access to vehicles in the interests of pedestrian safety and Vision Zero.

The Transport Assessment includes an Active Travel Zone assessment and review of accidents, in general accordance with TfL guidance. The deficiencies in the local walking / cycling environment that are identified should be addressed through planning obligations and improvements to the local walking and cycling network.

Trip Generation and Impact

The proposed mode shares for the care accommodation and nursery have been determined from TRICS sites in south-east England outside Greater London. The mode shares are not considered reflective of the site location and PTAL, and therefore the trips generated by sustainable transport modes have been underestimated. The proposed vehicle mode share should reflect the level of car parking permitted as per Publication London Plan Policy T6. The applicant must therefore revise the trip generation assessment to enable a robust estimate of the development's impacts on the local sustainable transport networks, in accordance with Publication London Plan Policy T4.

Based on the current methodology, the proposed development is expected to generate an increase in 31 vehicle trips in the AM peak hour and a reduction in 15 vehicle trips during the PM peak hour. Given the existing congestion in Uxbridge town centre, the traffic generated by the development (resulting from the high level of car parking currently proposed) would not contribute towards improving air quality, public health and local bus journey times.

Delivery and Servicing and Construction Logistics Plan

The submitted Delivery and Servicing Strategy is welcomed and generally acceptable. A final Delivery and Servicing Plan (DSP) should be secured by condition. The plan should include an estimate of the delivery / servicing vehicle trips expected and measures to reduce movements.

The submitted Construction Logistics Plan (CLP) is also welcomed and generally acceptable. The submission and implementation of an updated CLP will need to be secured by condition. The CLP will need to be prepared in accordance with TfL's guidance and include / finalise details of: site access arrangements, booking systems, construction phasing, likely construction trips generated, vehicle routes, swept path analysis, measures to reduce the number of road trips generated and measures to improve safety for vulnerable road users. The CLP will also need to include co-ordination arrangements with other developments in the area to ensure management of cumulative impacts.

Travel Plan

A Travel Plan (TP) has been submitted with the application. The final TP and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement. The final TP should set ambitious mode share targets for increasing sustainable travel, in line with the Mayor's Transport Strategy.

Community Infrastructure Levy

The development will be liable to Mayoral Community Infrastructure Levy 2 (MCIL2) which came into force on 1st April 2019, as well as borough CIL. The rate for the London Borough of Hillingdon is £60 per square metre of floorspace. The applicant should ensure they are fully aware of the regulations.

Summary

In summary, we request that the applicant addresses the matters discussed above, before we can be supportive of the proposal.

We would like to draw to your attention the following areas or details that will require further work:

- The inclusion of general residential car parking is unacceptable and not compliant with Publication London Plan Policy T6. A car club should be considered in lieu of general parking.
- Blue Badge car parking should be prioritised from the outset.
- Cycle parking should be provided in line with the minimum standards (Publication London Plan Policy T5) for residential developments.
- The design of the cycle parking should comply with the London Cycle Design Standards.
- The proposed footway running through the site should be widened to safely accommodate the

expected level of pedestrian trips.

- The trip generation assessment should be revised to reflect the site location, PTAL and policy-compliant level car parking.
- The applicant should undertake a robust assessment of the impacts on the local public transport, walking and cycling networks to accord with Publication Policy T4.

I trust this provides you with an understanding of our current position on this application. Please do not hesitate to contact me should you have any queries.

Internal Consultees

ACCESS OFFICER - COMMENTS (NOVEMBER 2020)

- a. The plans in terms of general compliance with London Plan policies 3.8 (c) and D7 are to an acceptable standard at this development control stage. However, the typical unit layout plan as shown in drawing title: Typical Unit Layouts - GCS, GCR_1BED&GCR_2BED, raises an objection. The GCS accommodation is only one bed, making an assumption that someone in need of care always lives a solitary life with no partner or family to share the accommodation. This could lead to a lack of suitable accommodation for someone who has a partner but requires GCS type accommodation.
- b. More details of the proposed Porte Cochere are required to ensure that high sided vehicles, such as those used by Dial-a-Ride and community transport can gain unrestricted access. A minimum height for such vehicles should be 3m.
- c. Given the nature of the development and the potential for large numbers of mobility scooters, a dedicated parking/charging facility should be incorporated into the scheme. It would be unacceptable for reasons of a fire safety and general health and safety to charge mobility scooters, outdoor wheelchairs and other such equipment within the general circulation areas and lift cores. The Design and Access Statement and plans should be amended accordingly.
- d. Further details are required on why a platform lift is needed to allow access to the wellness centre when there are to fully fledged lifts in the same zone as shown on drawing no. UBX001-MPI-ZZ-00-DR-A-200100.
- e. The supporting Design and Access Statement refers to a 'stay put policy' but refers to the ability to override the fire suppression system. This infers that people may need to evacuate which highlights an inconsistency, suggesting that a workable and robust evacuation procedure has not been given due consideration early on in the design process. Fire safety is now a key element of Development Control as set out in policy D12 of the 2019 (intend to publish) London Plan. Further details must be requested.

CONCLUSION: unacceptable. Further details are requested as set out in points 1-5 above.

ACCESS OFFICER - REVISED COMMENTS (DECEMBER 2020)

In answer to the "Response to Access Officer Comment" dated 2nd December 2020, the following reply is provided:

- a. Guild Care Suite Accommodation - No further concerns.
- b. Porte Cochere - No further concerns.
- c. Mobility Scooters - Whilst the revised plans show enlarged mobility scooter storage and charging facilities, the provision is still considered to be insufficient given the intended use of the site, its town centre location and the likelihood that mobility scooters and similar vehicles would be a primary form of transport for many residents. A 10% ratio of residents to mobility scooter parking spaces is

suggested.d. Wellness Centre Platform Lift - A platform lift is considered to be an unsuitable means of providing appropriate and dependable inclusive access. Platform lifts are slow, cumbersome and notoriously unreliable. There is no reason why the adjacent full passenger lifts could not serve the wellness centre using access control measures restricting access to private quarters by visiting members of the public.e. Stay Put Policy - No further concerns are raised.Conclusion: unacceptable. Further amendments are requested.

ACCESS OFFICER - REVISED COMMENTS (MARCH 2021)

Further to a review of Drw number: 624_P_00_100, rev P11, dated 10/3/21, I can confirm the following:

1. The Wellness Centre is now located on the ground floor and can be accessed at street level, thus eliminating the need for platform lift access.
2. The dedicated mobility scooter room provides parking for 18 vehicles, with a further 2 spaces provided within the cycle store. This latest plan overcomes the previous accessibility objections and no new concerns are raised.

Conclusion: Acceptable from an accessibility aspect.

LBH HOUSING OFFICER (MARCH 2021)

A commuted sum should be acceptable on the Harefield Road site given the unique housing that is proposed. However the proposal includes a huge reduction in the affordable housing offer from £3m to £500k when there is only a reduction of 12 units. I trust the specialist FVA appraisal will robustly review the FVA and increase this offer significantly.

AIR QUALITY OFFICER - (NOVEMBER 2020)

The proposed development is located with the Uxbridge Focus Area, bringing traffic and energy production emissions which will add to current exceedances. As per the new London Plan, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

Using trip generation rates reported in the Transport Assessment per land used proposed, the proposed development is not air quality neutral for transport emissions for the C2 and D1 uses proposed.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan Intent to Publish version (December 2019) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied. The level of mitigation required to the proposed development for traffic emissions is £95,591.

Once all deductions were applied, the remaining value of mitigation due is £81,252. Flat rate deductions applied are as follow: Travel Plan (10%).The level of mitigation required due to the proposed diesel backup generator emissions is £17,362, assuming the diesel backup generator will operate in average 100 hours per annum.

Therefore, a section 106 agreement with the LAP of £98,615 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

In addition, two Air Quality conditions are required to develop and implement a Low Emission Strategy and manage construction emissions as required by the Mayor of London.

AIR QUALITY OFFICER (MARCH 2021)

The proposed development is located with the Uxbridge Focus Area, bringing traffic and energy production emissions which will add to current levels of air pollution. As per the London Plan(GLA, 2021), developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

The LBH Air Quality Action Plan 2019-2024 has been produced as part of the LA duties to manage local air quality. It includes measures that address the requirement to improve air quality within Focus Areas.

Per definition, Focus Areas are areas where current air pollution levels are unacceptable and current measures are not sufficient to reduce exposure and safeguard public health. Therefore, within Focus Areas, and as per the LBH Local Action Plan, a more stringent application of mitigation is required (measure 5). Given that current levels of emission are unacceptable in Focus Areas, new developments are evaluated by LBH not in relation to the existing use, but in relation to the total level of emissions they originate within the Focus Area so that the suitable level of mitigation required is ascertained.

The operation of the proposed development originates 679 daily LDV trips which is a significant level of traffic circulating in the already congested Uxbridge Focus Area. In addition, the proposed development will include a diesel fuel oil emergency generator, which, as widely known across London Boroughs, can produce significant levels of pollution. As per the LBH Local Action Plan, these emissions are required to be mitigated.The updated air quality addendum mentions the applicant is considering to apply SRC (Selective Catalytic Converter) to the diesel backup generator with a 75% removal efficiency; this is to be secured via a condition.

As indicated by LBH during consultation, given the sensitive location of the application site in terms of air quality, GLA's Guidance on Neutral Assessment for C2 use provided on Table 12 of the document should be used. Table 12 of the guidance (Table 12:Transport Emissions Benchmark (TEB) approach for each Land-use Category, page 22) recommends uses C3/C4 to be used to derive a Transport Emission Benchmark,rather than the generic alternative approach used by the applicant.Following GLA's guidance and using trip generation rates reported in the Transport Assessment Addendum per land used proposed, the proposed development is not air quality neutral for transport emissions for the C2 and D1 uses proposed. LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area.Finally, the London Plan (March 2021) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

DAMAGE COST AND MITIGATION MEASURES

The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach. The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied.

The level of mitigation required to the proposed development for traffic emissions is £75,107. Once all deductions were applied, the remaining value of mitigation due is £63,841. Flat rate deductions applied are as follow: Travel Plan (10%), Green Measures (5%). The level of mitigation required due to the proposed diesel backup generator emissions is £5,421, assuming the diesel backup generator will operate in average 100 hours per annum and that SCR with 75% efficiency removal is fitted. Therefore, a section 106 agreement with the LAP of £69,262 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

In addition, two Air Quality conditions are required to develop and implement a Low Emission Strategy and manage construction emissions as required by the Mayor of London.

CONSERVATION AND DESIGN OFFICER (JANUARY 2021)

Prior to the submission of this application several pre-application meetings have taken place. Despite the scheme having been amended during this process there have been some fundamental concerns concerning the extent of the proposed development and the impact that this would have on the surrounding townscape as well as the quality of living accommodation that would be provided.

The site and surrounds

The existing site is comprised of low-lying retail units that are circa three-storeys (equivalent in height, with a large open front court area for car parking, access, servicing and landscape. The existing buildings cover approximately two-thirds of the site area and are significantly set back from the western boundary. There is mature landscape along the northern and western boundaries that help to integrate the site with the surrounding suburban context and soften the impact (screening) for the residential houses that abut the site.

The site itself is located on the north-western edge of the town centre boundary. Therefore, an appropriate transition of scale from modest suburban to urban will be critical to the success of the development.

The development site is not within a designated area but is in a sensitive location surrounded by heritage assets. To the south is the north western section of the Old Uxbridge/Windsor Street Conservation Area which is focused on the High Street. The north side is closest to the site has a run of grade II listed buildings, numbers 118-123. Opposite on the south side are the grade II listed The Cedars and the Old Bank House. An alley leads off to the north to Beasleys Yard where there is the Grade II listed Watts Hall. There is a further run of listed buildings commencing on the other side of the alley, numbers 126-135 High Street and these are terminated by the grade II The Crown and Sceptre Public House (now Whelans). Opposite the site on the Harefield Road is the locally listed Uxbridge Magistrates Court and to the north east the North Uxbridge Area of Special Local Character.

The development therefore also needs to address the many heritage assets that surround the site - particularly the High Street and Harefield Road.

The development also needs to respond to the topographical conditions of the site, as it is located on an incline that broadly rises from the south to the north.

Any development that is proposed to exceed the prevailing context height level of one to three-storeys, will start to significantly impact the townscape character and setting, as the site is above the High Street and town centre to the south, and below the residential houses and prevailing suburban morphology to the north, east and west.

Height/Scale/Massing

The proposed development comprises two 'L-shaped' blocks with a podium and public space to the centre. The western / southern block (Block A) fronting onto Harefield Road is three to seven-storeys in height with three to five-storeys at the lower levels to Harefield Road. The north / eastern block (Block B) is four and eight storeys. The site resides within a predominantly modest suburban setting, with the majority of the buildings comprising two-storey houses and some three to four-storey retail, office and civic buildings, further south and eastwards.

The proposal would dramatically intensify the developed nature of the site. Built form would cover most of the site with heights ranging from 3- 8 storeys. It is noted that some of the neighbouring buildings to the south and west are 4-storeys in height, but the vast majority of buildings are 2-3 storeys. The police station to the west has a staggered 4-storey appearance with a roof form which steps back from the street frontage. This combined with its angled positioning lessens its impact along Harefield Road. The proposal would be substantially taller than its immediate context. The proposed development is a complete juxtaposition to the local suburban area and edge of town centre condition, due to the jump in scale / massing difference from the proposed development to the immediate area.

The Townscape Visual Impact Assessment confirms these concerns in particular views F, G, H, I and K. It should be noted that these views are static and the development would also be appreciated in numerous kinetic views as one moves through the area. The development would also be seen within gaps between the buildings and from the rear garden, service yards and access roads in close proximity to the site appearing overbearing within the two storey suburban context and the three to four-storey retail, office and civic buildings, further south and eastwards of this edge of town centre location.

Layout

The proposed development comprises two 'L-shaped' blocks with a podium and public courtyard space to the centre.

The front building line is too close to Harefield Road and would result in a much more enclosed character that would be exacerbated by the building extending up to 5-storeys. The established buildings along this stretch of Harefield Road are much lower at 2-3 storeys in height and have greater setbacks and are softened by street trees and other greenery provided by front gardens. There are concerns that the frontage does not respond well to the established street scene and would be overbearing and detract from this part of the townscape.

The block steps forward of the adjacent houses, 14-16 Harefield Road, to the north and as a consequence would dominate them exposing a large blank flank wall. This can be seen in View H of the Townscape Visual Impact Assessment along with the overbearing impact of the taller 7 and 8 storey blocks in the background.

The plans show that trees are to be planted along the pavement of Harefield Road, but there does not appear to be sufficient space to allow any meaningful trees to grow and mature. It also appears

that the proposed location of the trees would also conflict with pedestrian movement in particular wheelchair users and prams etc.

The greater the height of buildings to the street frontages the greater the setbacks should be so that they do not become overbearing. This would also allow for sufficient space to allow soft landscaping for amenity space and street trees.

There are concerns that an acceptable balance between the suburban houses and this edge of town centre location has not been achieved and the development does not sensitively integrate into this part of the townscape.

There are also concerns with the layout of the units as a significant number of them are single aspect and would not achieve high quality living accommodation.

Impact on Heritage Assets

The proposed development site is in a sensitive location surrounded by heritage assets. To the south is the north western section of the Old Uxbridge/Windsor Street Conservation Area which is focused on the High Street. The north side is closest to the site and has a run of grade II listed buildings, numbers 118-123. Opposite on the south side are the grade II listed The Cedars and the Old Bank House. An alley leads off to the north to Beasleys Yard where there is the Grade II listed Watts Hall. There is a further run of listed buildings commencing on the other side of the alley, numbers 126-135 High Street and these are terminated by the grade II The Crown and Sceptre Public House (now Whelans). Opposite the site on the Harefield Road is the locally listed Uxbridge Magistrates Court.

The application needs to be assessed in terms of its impact on the setting of the listed buildings, conservation area, locally listed magistrates court and the North Uxbridge ASLC.

The Heritage and Townscape Assessment identifies a number of static views the locations of which were agreed during pre-application discussions. The assessment demonstrates that the development would not be seen in the majority of views where there is heritage sensitivity. There are a couple of exceptions which are the views around viewpoint K where the development would impact on the setting of the grade II listed 118 High Street and the Old Uxbridge/Windsor Street Conservation Area as well as the setting the locally listed Uxbridge Magistrates Court.

View K shows that the development would rise up slightly above 118 High Street at the western end of the Old Uxbridge/ Windsor Street Conservation Area and would be seen in their backdrop and would impact on their settings. The eight-storeys of 'Block B' would interfere with the roofline where the traditional hipped profile of the listed building would merge with the new block. The distinctive roof profile of the listed building would, therefore, be lost against the skyline.

The harm identified would be considered 'less than substantial harm' to the setting of 118 High Street and the Old Uxbridge/Windsor Street Conservation Area. In line with paragraph 196 of the NPPF, the less than substantial harm arising from the impact of the development on the setting of 118 High Street and the Old Uxbridge / Windsor Street Conservation Area would need to be weighed against the package of public benefits arising from the scheme.

The Uxbridge Magistrates Court is a locally listed building located opposite the development site on the western side of Harefield Road. The part of proposed 'Block A' directly opposite the Magistrate Court would be three to four storeys with a fifth storey set back on the corner. The development would look out of scale with the single-storey with an attic Magistrates Court and two-storey suburban houses further along Harefield Road. The scale of the proposal will overwhelm the locally listed building and dilute its historic significance as an important public building. This will only be exacerbated by the height of the 7/8 blocks behind.

Conclusion

The NPPF clearly outlines the importance of good (appropriate) design. It specifically references the prevailing character and setting of an area with regards to development impact on the existing context. And high-quality buildings and spaces should be sympathetic to the area, which is fundamental to creating sustainable development/ growth where people want to live and work. It is appreciated that innovation can occur if it can optimise land for a range of uses in appropriate locations. And that it raised the standard of design in the given area, so long as it sits in with the overall form and layout of the surroundings.

Unfortunately, the scale and impact of the proposed development is too much for the proposed site and it will severely impact on the character of this edge of town centre location and suburban setting and is not, therefore, considered appropriate on Design grounds.

The proposals would also have an impact on the setting of 118 High Street and this part of the Old Uxbridge / Windsor Street Conservation Area. The less than substantial harm arising from the impact of the development would need to be weighed against the package of public benefits arising from the scheme.

Harm has also been identified to the setting of the locally listed Uxbridge Magistrates Court where the proposal will overwhelm the locally listed building and dilute its historic significance as an important public building.

CONSERVATION AND DESIGN OFFICER - MARCH 2021

The amended drawings / visuals show an improvement to the Harefield Road frontage with the building line being set back a further 2 metres. This has helped to lessen the development's dominance on the street frontage as well as reduce its imposing presence on the neighbouring houses (nos. 14-16 Harefield Road). The proposals now allow for more landscaping to the front of the building and helps to provide a more satisfactory transition to the suburban houses directly to the north.

The setback will also allow for more substantial street trees, adequate pavement widths as well as additional landscaping to help improve and soften the developments setting.

The kinetic views video along Harefield Road is useful in appreciating the impact of the development from the more immediate street frontage. It would be useful if the footage started further along Harefield Road to the north so that the development can be appreciated in slightly longer views. There are still some concerns with the height and bulk of the blocks that rise up to the rear above the predominantly 2-3 storey suburban townscape (View H of the Heritage, Townscape and Visual Impact Assessment).

Given the context it is considered that the 7 storeys to Block A is still a storey to high given that the land rises from Harefield Road and would benefit from one of the floors being removed.

The reduction in height and massing of Block B is also an improvement and has helped to lessen the impact of the development on this part of the townscape. This is also illustrated within the footage taken along Press Road and View I of the Heritage, Townscape and Visual Impact Assessment and allows the development to sit more comfortably within these views.

The amendments to the blocks have also helped (View K of the Heritage, Townscape and Visual Impact Assessment) to reduce the impact on the conservation area and listed buildings and the impact on these heritage assets are now considered acceptable.

Should the application be minded for approval then I would suggest the following conditions:

- Samples of all external finishing materials.
- Sample panels of brickwork be constructed on site showing the colour, tone and texture of the brick, the brick bonding pattern, mortar colour and joint finish.
- Details of hard and soft landscaping Details of parapets, brickwork surrounds.
- Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority.

CONTAMINATED LAND OFFICER - COMMENTS (NOVEMBER 2020)

I have reviewed the following reports which were submitted with the application:

- Title: Ground Investigation Report; Ref: TL1306GIR; Issue 1.2; Date: 01 September 2020; Prepared by Tier Environmental Ltd.

Included as Appendix P in the above report:

- Title: Phase I and II Geo-Environmental Assessment; Ref: 1CO102125P1R0; Date: September 2016; Prepared by Resource and Environmental Consultants Ltd (REC)

Site investigations outlined in the above reports identify elevated concentrations of contamination including beryllium, lead, asbestos and PAH detected in quantities that exceed assessment criteria at some areas of the subject site. (There is also evidence that hydrocarbon / VOC contaminants are present).

The proposed change of use from commercial to residential land, could introduce unacceptable exposure to contamination that is not suitably addressed and/or removed from site, thereby increasing risk/s to future residents, particularly to more sensitive age groups in sensitive areas of proposed gardens and landscaped areas, including other general open spaces, where exposed ground may be present.

In the event that unacceptable concentrations of ground gases including possible VOC's as outlined in the report are confirmed, and/or as may be identified following demolition of the existing buildings, then there will be a requirement for suitably specified protection measures to be introduced, to prevent possible ingress of hazardous gases and/or VOC's into the proposed new buildings.

Should planning permission be awarded it is highly recommended that the following conditions be imposed:

Proposed conditions for land affected by contamination.

(i) The development shall not commence until a detailed scheme to deal with contamination has been submitted to and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A supplementary site investigation, to include areas beneath the footprint of the existing buildings and to also delineate the extent of previously reported hotspots (including any new contaminant hotspots that may be identified beneath the existing buildings); the works shall be conducted by a suitably qualified and accredited consultant/contractor. A detailed report of the findings shall be

submitted to and approved in writing by the LPA. The report shall include newly acquired data from analyses and provide associate risk assessments which clearly identify all residual risks and limitations, and shall also offer recommendations for appropriate remedial measures to address all identified hotspots and thereby ensure contaminants of concern within all suspect areas of the site are suitably addressed; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works for each area will be verified shall be agreed in writing with the LPA prior to commencement of each phase, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

2 Reason for Refusal (if objecting)

The recent reports, (as submitted with the application), confirm the site has a history of contaminative uses, comprising industrial and commercial activities including "an iron works, unspecified depot, unspecified warehouse, builders' merchant, garage and vehicle repair centre, unspecified tank and electricity substation."

In this case it is considered that the proposed development may pose an unacceptable risk to human health and may also cause a detrimental impact to groundwater water quality because the:

- applicant has failed to indicate the means of addressing hotspots where areas of elevated concentrations of contaminants are shown to be present.
- applicant has failed to provide suitable details of how possible gas and/or identified VOC will be addressed during the construction phase of this development.
- applicant has failed to identify methods to establish if / where underground tanks are still present at the site.
- Furthermore, the previous uses of the proposed development site also present a high risk of contamination from hydrocarbons (e.g. as identified by oil sheen on water) that could be mobilised to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal aquifer.

3 Observations:

- Mapping and tabulated information within environmental search details provided by Groundsure shows records of two tanks; the information suggests one may be situated on site and another off site in vicinity (20m) of the south eastern boundary. Further investigation is required to determine whether or not underground tanks are present at the site.

CONTAMINATED LAND OFFICER - REVISED COMMENTS (FEBRUARY 2021)

Site investigations outlined in the above reports identify elevated concentrations of contamination including beryllium, lead, asbestos and PAH detected in quantities that exceed assessment criteria at some areas of the subject site. (There is also evidence that hydrocarbon / VOC contaminants are present).

The proposed change of use from commercial to residential land, could introduce unacceptable exposure to contamination that is not suitably addressed and/or removed from site, thereby increasing risk/s to future residents, particularly to more sensitive age groups in sensitive areas of proposed gardens and landscaped areas, including other general open spaces, where exposed ground may be present.

In the event that unacceptable concentrations of ground gases including possible VOC's as outlined in the report are confirmed, and/or as may be identified following demolition of the existing buildings, then there will be a requirement for suitably specified protection measures to be introduced, to prevent possible ingress of hazardous gases and/or VOC's into the proposed new buildings.

Should planning permission be awarded it is highly recommended that the following conditions be imposed:

(i) The development shall not commence until a detailed scheme to deal with contamination has been submitted to and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A supplementary site investigation, to include areas beneath the footprint of the existing buildings and to also delineate the extent of previously reported hotspots (including any new contaminant hotspots that may be identified beneath the existing buildings); the works shall be conducted by a suitably qualified and accredited consultant/contractor. A detailed report of the findings shall be submitted to and approved in writing by the LPA. The report shall include newly acquired data from analyses and provide associate risk assessments which clearly identify all residual risks and limitations, and shall also offer recommendations for appropriate remedial measures to address all identified hotspots and thereby ensure contaminants of concern within all suspect areas of the site are suitably addressed; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works for each area will be verified shall be agreed in writing with the LPA prior to commencement of each phase, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

The recent reports, (as submitted with the application), confirm the site has a history of contaminative uses, comprising industrial and commercial activities including "an iron works, unspecified depot, unspecified warehouse, builders' merchant, garage and vehicle repair centre, unspecified tank and electricity substation."

In this case it is considered that the proposed development may pose an unacceptable risk to human health and may also cause a detrimental impact to groundwater water quality because the:

- applicant has failed to indicate the means of addressing hotspots where areas of elevated concentrations of contaminants are shown to be present.
- applicant has failed to provide suitable details of how possible gas and/or identified VOC will be addressed during the construction phase of this development.
- applicant has failed to identify methods to establish if / where underground tanks are still present at the site.
- Furthermore, the previous uses of the proposed development site also present a high risk of contamination from hydrocarbons (e.g. as identified by oil sheen on water) that could be mobilised to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal aquifer.

Observations

- Mapping and tabulated information within environmental search details provided by Groundsure shows records of two tanks; the information suggests one may be situated on site and another off site in vicinity (20m) of the south eastern boundary. Further investigation is required to determine whether or not underground tanks are present at the site.
- The site is underlain with superficial strata of the Lynch Hill Gravel Member, designated by the Environment Agency as a Primary Aquifer, which represents controlled waters that are required to be protected accordingly
- It is considered the land at the site is suitable for its current use as retail premises. However, the application involves a proposed change of use from commercial (retail) to residential property - It is therefore recommended that a supplementary geo-environmental investigation / risk assessment of

the site should be conducted, in order to ensure all areas of land are further characterised and assessed in terms of identified contaminants.

· The geo-environmental assessment should be structured and targeted in accordance with the proposed future planned designs and layouts for the proposed residential care home,

· The Tier report states:

"however, due to elevated VOC's being encountered during the intrusive works, and during subsequent monitoring visits the need for vapour protection measures may be required."

· Therefore, an updated soil gas survey and scheduled monitoring will serve to confirm whether or not unacceptable concentrations of ground gases are present in materials beneath the existing structures and which may impact the proposed new development; A suitably structured soil gas / VOC survey should also involve testing to be conducted in areas beneath the footprint of the proposed new buildings.

CONTAMINATED LAND OFFICER - SUMMARY COMMENTS (MARCH 2021)

Having reviewed further information provided within the correspondence from Tier Environmental Ltd I am now satisfied that the details concur with the conditions that I recommended to be imposed.

I am also satisfied the proposed course of actions, as listed in the tabulated details (Table 1.2) within the correspondence, will be suitable to address the earlier identified objections and thereby ensure the land will be made suitable for the proposed change of use

However, in order for the LPA to be suitably reassured that the proposed work will be conducted and reported in an appropriate manner, I am continuing to recommend the same proposed conditions for land affected by contamination are imposed accordingly.

FLOOD WATER MANAGEMENT OFFICER - DECEMBER 2020

No objection in principle to the development based on the submitted information. A Flood Risk Assessment (Tier Environmental Report Reference TL/1306/FRA Revision 1.3 Dated 03/08/2020) has been submitted to support the application. The conclusions reached in the FRA are agreed with and the risk of flooding at the site is considered to be low. It is noted that the Flood Risk Assessment does not reference the relevant Local Plan Part 2 Development Management Policies (Adopted January 2020), such as DMEI 1, DMEI 10 etc; however this does not change the outcome of the assessment. A Drainage Strategy (Tier Environmental report reference 913-TSY-ZZ-XX-RP-C-1001 revision 007 dated 16/09/2020) has been submitted to support the application. The Drainage Strategy is considered to be appropriate for this stage of design and acknowledges the information that is required to undertake the detailed design. Most notably, confirmation of the existing and proposed discharge point from the surface water drainage network. It is noted that previous applications have sought to discharge into the highway drainage which is not appropriate, however this application assumes that a new connection into the Thames Water surface water ewer in Harefield Road would be required. The outline drainage strategy includes green roof areas, rainwater harvesting, permeable paving and integration with the soft landscaping which should be retained during detailed design. The detailed design of the drainage system should be secured by way of a suitable surface water management condition.

FLOOD WATER MANAGEMENT OFFICER - MARCH 2021

No objection - a summary of the changes to the plans have been provided by the consultant (Tier Environmental) who have confirmed that the conclusions of the original drainage strategy have not changed.

SUMMARY OF HEALTH AND SOCIAL CARE COMMENTS - FEBRUARY 2021

Concerns raised regarding potential adverse impacts on social care budgets as a result of the applicants business model:

SUMMARY OF APPLICANT'S RESPONSE TO CARE HEALTH AND SOCIAL CARE COMMENTS - FEBRUARY 2021:

The development has been design to provide integrated level of care and support to future occupants. It includes extensive amenities for future residents and provides an environment that allows residents to live independently with the right level of support to meet their care needs.

The applicant estimates that there are 5,133 eligible households in LBH who have capital to move into the development.

OFFICER COMMENT:

The impacts on social care from this scale of development are very complex and officers consider existing planning policies are more orientated to considering affordable housing impacts than whether the benefit does or does not have positive social care impacts. Affordable housing impacts are explained in detail elsewhere in the report.

HIGHWAYS OFFICER - APRIL 2021

The site

The application site is situated on the edge of Uxbridge town centre on the eastern side of the B467 Harefield Road, Harefield forms part of the Boroughs Classified Road Network and is a bus route. In the vicinity of the site, Harefield Road benefits from footways on either side of the carriageway, street lighting and a 30mph speed limited. To the immediate south of the application site is the Hillingdon Metropolitan Police Headquarters, the Police HQ takes access from Warwick Place as do a number of small commercial premises and the rear service yard of a McDonalds restaurant fronting onto the High Street in Uxbridge town centre.

Transport for London use as system called PTAL (Public Transport Accessibility Level) to measure access to the public transport network. PTAL assesses walk times to the nearest public transport location taking into account service frequency. The location is then scored between 0 and 6b where 0 is the worst and 6b the best.

According to the Transport for London WebCAT service the application site has a PTAL ranking of 5 indicating access to public transport is very good compared to London as a whole suggesting that there are opportunities for some trips to be made to and from the site by modes other than the private car.

The development

The proposal is to provide residential accommodation that would offer specialist extra-care housing for older persons. It would offer a variety of accommodation options, with a 'variety of later living accommodation options, with levels of care tailored to the individual'. The development would comprise 161no. Guild Living Residencies, 7no. Guild Care Living Suites and 26no. Guild Care Suites - 194no. in total. In addition, there would be a 281sqm Nursery for 80no. children with 15no staff, a 350sqm Restaurant and a 259sqm Wellness Centre.

The main access into the site would be off Harefield Road in the same location as the existing Wicks and Halfords bell mouth entrance/exit. This access would however be narrowed and converted to one-way working in a clockwise direction. The internal access road would be extended to pass around the rear of the Police HQ where it would then connect to the far end of Warwick Place. The link from the application site to Warwick Place is currently closed to traffic. This one-way access road would be 3.7 meters wide. The site would provide 76no. stacker car parking

spaces for residents in an undercroft car park and a further 16no. on-street spaces along the internal access road. The vehicle entrance to the undercroft parking would be situated just c15 meters back from the B467 Harefield Road. This parking would operate using a valet parking service. The 16no. access road on-street space would be allocated to valet parking 5no. - 2no. on the approach 'before' the undercroft entrance, the remainder 'after', minibus parking 1no., staff parking 2no., shared nursery/valet parking 1no. and visitor/carer parking 5no. Nurses and carers would be allowed to use the visitor bays but would be required to book ahead to reserve a space. These workers will be prioritised over general visitors to the development. There would also be a layby for pick up and drop off with space to accommodate 2no. cars. 20% of all parking would be provided with active electric vehicle charging points with all the remainder having passive provision. The proposal would provide 44no. short stay cycle parking spaces and 32no. long stay spaces.

Trip generation

In its existing use the site generates an estimated 29no. two-way movements in the AM peak 08:00h - 09:00h and 67no. two-way movements in the PM Peak 17:00h to 18:00h. This level and profile of activity is considered representative for A1 (non-food) retail uses, in general the number of customers visiting tends to start to build later in the morning. 'With' the development the site would generate 56no. two-way movements in the AM Peak and 48no. two-way movements in the PM Peak. This modelling shows that in the AM Peak the number of movements generated by the site would increase by 27no. and in the PM Peak it would fall by 19no. As proportion of all vehicle movements on the surrounding highway network an increase of 27no. movements over one hour is considered insignificant.

Parking

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 6: Vehicle Parking requires that development proposals must comply with the relevant parking standards. For a development of this type the maximum number of parking spaces permitted would range between 1no. and 1.5no. for the 1 and 2 bed units and 2no. for the 3 bed units. For the residential part of the development the maximum number of car parking spaces permitted would range between 154no. and 294no., taking into account that the site has a high PTAL ranking, the maximum number of car parking spaces for the residential part of the development that the Highway Authority would accept would be 154no.

With regard to cycle parking the Local Plan (2020) would require a maximum of 1no. cycle parking space for the 1 and 2 bed units and 2no. for each of the 3 bed units, these standards would allow a maximum of 164no. cycle parking spaces.

However, the recently adopted London Plan (2021) Policy T6 has introduced new car parking standards. For a development of 194no. units with the bedroom mix described above in an area of PTAL 5 the development should tend towards being car-free - no car parking at all. Where car parking is provided then 20% should be provided with active electric vehicle charging facilities with all the remainder having passive provision.

For cycle parking the London Plan (2021) Policy T5 would require a minimum of 1no. space for each 1 bed unit and 1.5no. for each 2 bed unit and 2no. for each 3 bed unit, these standards would require a minimum of 231no. cycle parking spaces.

For the nursery part of the development the Local Plan (2020) requires that the number of car parking spaces to be provided is assessed on an individual basis using a Transport Assessment and Travel Plan. The London Plan 2021 Policy T6 requires that car parking be restricted in line with levels of existing and future public transport accessibility and connectivity tending towards being car-free.

The London Plan (2021) would require cycle parking at the Nursery to be provided based on a minimum standard of 1 space per 8no. members of staff and 1no. space per 8no. students. Based

on these standards the nursery would be expected to provide 12no. cycle parking spaces.

As both the Restaurant and Well Being Centre are an integral part of the Residential provision, car and cycle parking for these uses is provided for as part of the residential parking provision.

Discussion

As mentioned above the proposal would have 76no. stacker valet parking spaces in the undercroft and 16no. on-street. The Local Plan (2020) would allow a maximum of 154no. car parking spaces and the London Plan (2021) would expect the development to be car-free. The 76no. stacker valet parking spaces accords with the Local Plan (2020) as it is below the maximum, but it exceeds the requirement of the London Plan (2021). The London Plan (2021) car-free standard is based on a policy of encouraging active travel. Given that the housing would be 'later living' accommodation with care provided as an option the Highway Authority considers the 76no. spaces proposed is appropriate striking a balance between the Local Plan (2020) and London Plan (2021) standards. 76no. units would have access to car parking and 118no. units would be car-free. The development could cater for elderly people in need of care, as such they are less likely to be car drivers and car owners in need of somewhere to park. The Highway Authority can accept the number of stacker car parking spaces provided for the residential part of the development.

There are however highway concerns regarding the management of the residents valet car parking and the number and layout of the on-street parking provided for nursery staff, nursery drop off/pick up, visitors, nurses, carers, the minibus, ambulances and cars being transferred to and from the valet parking.

As mentioned above the residents' undercroft parking would operate using a valet parking service. Resident would request that their car is collected from the undercroft, and it would then be parked in one of the 5no. valet parking bays for them to collect and then drive away. When they return home, they would again park in one of the 5no. valet car parking spaces and leave their car keys with a member of staff who would then arrange for the concierge to park the vehicle in the undercroft. As mentioned above the first 2no. of the valet parking spaces would be located between the Harefield Road access and the undercroft entrance with the remaining 3no. past the undercroft entrance further into the development. Because there would be one-way system in operation, if the first 2no. valet spaces are occupied the resident would have to drive past the undercroft entrance and park in one of the 3no. spaces further along the internal access road. Whenever this situation arises, to gain access to the undercroft the concierge would have to loop around the site and join the Harefield Road only to then re-enter to park in the undercroft. This places unnecessary stress on a network that is already at capacity during peak times. It also unnecessarily increases the risk of collision between these vehicles and vulnerable road users.

The Highway Authority also has concerns regarding parking provision for the nursery, there would be just 3no. pick up and drop off spaces to cater for 80no. children and 15no. members of staff. When these occupied, the concierge would direct parents/carers to the 5no. visitor parking spaces. As these spaces are situated past the Nursery entrance, some parents/carers may be motivated to stop and park injudiciously holding up the vehicles behind leading to the formation of queues. The Highway Authority notes that picking up and dropping off a young child can be time consuming. The driver needs to get out of the car to open the door for the child, take them out of a child seat, collect all their belongings leave the car and walk to the Nursery entrance. The parent/carer will then have to responsibly leave the child at the nursery, return to the car and driveaway. As the Nursery has places for 80no. children, even if arrivals and departures are staggered their will be a lot of activity on this internal access road. Whilst all this Nursery activity is taking place a refuse vehicle or visitor may arrive, at the same time a concierge may be driving a vehicle around the site returning a car to the stacker/valet parking.

The use of the 5no. visitor/carer parking spaces would be managed through a booking system, visitors and carers would not therefore have the convenience of 'popping in' to see a relative if they happen to be passing. Despite not having booked they may decide visit in any case, this could result in them parking injudiciously hindering the free flow of traffic on the internal access road and presenting a risk to road safety.

The site would provide just 1no. bay to cater for refuse collections, laundry collections/deliveries and food deliveries etc.

The highway concerns regarding this proposal, these all stem from the volume of activity taking place along the internal access road - its design and layout is not considered to be able to cope with the demands being placed upon it.

There is a risk that vehicles entering the site may find their route ahead blocked by cars manoeuvring to park, parents/carers dropping off or collecting children as well as refuse and other servicing vehicles. As mentioned above the internal access road is not wide enough to allow vehicles to overtake and pass, situations could arise where the volume of traffic on-site leads to the formation of queues and injudicious parking impeding the free flow of traffic and presenting a risk to road safety, the proposal would therefore be contrary to the Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 1: Managing Transport Impacts - road safety, Policy DMT 2: Highway Impacts - traffic congestion

Conclusion

The applicant contends that through careful and 'fine-tuned' management the internal access road and the 16no. car parking spaces would be able to operate satisfactorily. In practice this the Highway Authority considers that this would not work at all times of the day for the lifetime of the development. Great reliance is placed on visitors (including blue badge holders), carers and nurses booking a car parking space in advance of their arrival. Furthermore, the expedient operation of the on-street car parking is reliant upon some of the car parking spaces serving more than one set of user at different times in response to demand. For example, to cater for peaks in nursery pick up/drop off traffic 2no. valet parking spaces, 1no, visitor space and the Porte Cochere would be brought into use. Similarly, the Porte Cochere would serve many users including nursery pick up/drop off, smaller and short-term deliveries, resident pick up/drop off and ambulances. To ensure the availability of a concierge at all times to carry out the tasks mentioned above there would need to be spare capacity in the number of concierge members of staff working at anyone time to cater for peaks in activity and the demand for their services.

For the reasons set out above the Highway Authority would have objections to this proposal. Should the application be recommended for approval, the following conditions and Heads of Terms should be secured.

Heads of terms:

1. A Travel Plan should be provided that contains a series of measures to reduce the amount of private car trips the development generates, it should include trip generation and modal split target, set out a monitoring regime and outline the measures that would be taken should the target not be attained. As surety that the Travel Plan will be implemented and targets achieved, the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a s.106 agreement. If the Travel Plan is successful, the bond will be returned.
2. Removal of parking permits for all future businesses and residents
3. The proposal would involve works to the site entrance at the bell mouth junction with Harefield Road. As these changes would involve works upon the Council's highway the Highway Authority would require the developer to enter into a S106 legal agreement obliging the developer to enter into a s.278 with London Borough Hillingdon under Highways Act 1980 thereby allowing such works to be

carried out.

4. Car Parking Management Scheme to provide details of parking management controls within the internal access road and within the undercroft car park. This should set out how the Stacker Parking will be maintained for the lifetime of their use.

5. A Healthy Streets contribution for works to along Harefield Road adjacent to the site and along the full length of Warwick Place that encourage and improve the safety and convenience walking and cycling to and from the proposal site.

Conditions:

1. Construction Logistics Plan is required; this is to ensure that construction traffic does not impede the free flow of traffic on the surrounding highway network or present a risk to road safety.
2. Service and Delivery Plan should be submitted for approval, this is key to the safe and efficient operation of the internal access road and parking arrangements
3. All on-street car parking spaces should be provided with active electric vehicle charging points, 20% of all undercroft parking spaces should be provided with active charging points with all the remainder having passive provision.
4. Unrestricted access along the new route from Warwick Place to Harefield Road

PLANNING POLICY OFFICER - DECEMBER 2020

Loss of retail

The site, which falls within Use Class E, is located within Uxbridge Metropolitan Town Centre, outside of the primary and secondary shopping areas. Part D of Policy DMTC 2 of the Hillingdon Local Plan: Part Two (2020) states that outside of defined primary and secondary areas, proposals for a change of use from retail will be permitted, provided the change does not result in the loss of an essential local service. The retail stores and associated parking currently occupying the site include a large hardware/DIY/materials store (Wickes) and a large bicycle/car parts store (Halfords), neither of which are considered to be essential shops as defined by paragraph 3.14 of the Hillingdon Local Plan: Part Two (2020).

The primary function of Part D of Policy DMTC 2 is to protect essential shops and the current uses on site are not considered to be essential shops.

Older Persons Housing and Care Home Accommodation

The applicant is proposing three different types of accommodation as part of this scheme, which would broadly fall into the following three categories:

- Guild Living Residences - Sheltered accommodation -161 units
- Guild Care Residences - Extracare accommodation -26 units
- Guild Care Suites - Care home -7 units

Demand

There is an identified need for specialist housing for older people identified in Hillingdon's 2016 Strategic Housing Market Assessment (SHMA). The Intend to Publish Version of the London Plan also states annual borough benchmarks for provision of specialist older persons housing for boroughs to take account of when determining provision of specialist housing for older people in the borough. Hillingdon's annual benchmark is set at 180 units per annum up to 2029. The Intend to Publish Version of the London Plan has also identified a need for care home accommodation however this is a London-wide estimate of 867 care home beds a year.

It appears as though the majority of the accommodation provided would fall within the NPPF

and London Plan definition of 'sheltered' and 'extra care' accommodation for which there is greater demand than residential care accommodation.

Policy DMH 8 of the Hillingdon Local Plan: Part Two (2020) states that the development of residential care homes and other types of supported housing will be permitted provided that:

- it would not lead to an over concentration of similar uses detrimental to residential character or amenity;
- It caters for a need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;
- The accommodation is fully integrated into the residential surroundings; and
- In the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport. The proposal is unlikely to lead an over concentration of similar uses within the immediate area and being an edge-of-centre location it is in close proximity to shops, community facilities and is easily accessible by public transport.

There is also an identified need for this type of development as mentioned above. The policy also states that proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). Policy H13 of the Intend to Publish Version of the London Plan states that specialist older persons housing should deliver:

- Affordable housing in accordance with borough and London Plan policies (Policies H4 and H5), which in the case of Hillingdon would equate to a minimum of 35% of homes to follow the fast-track route;
- Accessible housing in accordance with Policy D7 of the London Plan;
- The highest standards of accessible and inclusive design in accordance with Policy D5;
- Suitable levels of safe storage and charging facilities for residents' mobility scooters;
- Pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs) minibuses and ambulances. 161 of the 194 proposed units would qualify for application of Policies H4 and H5 of the Intend to Publish Version of the London Plan. Policy H5 of the Intend to Publish Version of the London Plan and Policy DMH7 of the Hillingdon Local Plan: Part Two require a minimum of 35% affordable housing. To follow the fast track route and not be required to submit a financial viability assessment, applicants must meet the following criteria:
- Meet or exceed the relevant threshold level of affordable housing on site (35%) without public subsidy
- Be consistent with the relevant tenure split (70/30 social rent/intermediate).

The applicant is proposing a payment in lieu of affordable housing rather than on-site delivery due to the complex communal living arrangements which will be provided on site and it being impractical to deliver affordable housing on site. A payment in lieu for a scheme such as this could be considered should exceptional circumstances be demonstrated as outlined in paragraph 4.4.10 of the Intend to Publish Version of the London Plan. This should be of a value equivalent to 35% of the 161 proposed specialist older persons housing.

Use Class of the Proposed Accommodation

It is advised that a legal agreement is sought which restricts occupancy of the units to the elderly and people in need of personal care. Without this the proposal would not fall within Use Class C2 and would instead be considered to fall within Use Class C3. If this is the case, the acceptability of the proposed housing mix which is primarily 1 bedroom apartments would need to be reconsidered as it is an unsuitable housing mix for general residential accommodation.

Nursery

The applicant is proposing a nursery on site as well. London Plan Policy 3.16 states that high quality social infrastructure is generally supported subject to local and strategic social infrastructure needs assessments. Policy DMCI 2 of the LPP2 states that proposals for the provision of new community facilities will be supported where they:

- Are located within the community or catchment that they are intended to service;
- Provide buildings that are inclusive, accessible, flexible and which provide design and space standards that meet the needs of intended occupants;
- Are site to maximise shared use of the facility, particularly for recreation and community uses; and
- Make provision for community access to the facilities provided.

Policy S3 of the Intend to Publish Version of the London Plan states that development proposals for education and childcare facilities should meet a number of criteria listed in the policy. This includes:

- locating facilities in areas of identified need;
- locating facilities in accessible locations;
- locating entrances and playgrounds away from busy roads, with traffic calming at entrances;
- link to existing footpath and cycle networks to create healthy routes to education and childcare facilities;
- encourage the shared use of services between early years and health and social care providers;
- ensure that facilities incorporate suitable, accessible outdoor space; and
- local facilities next to parks or green spaces, where possible.

Paragraph 7.21 of the LPP2 also states that the noise and traffic generating potential of childcare facilities will be two of the main considerations in assessing planning applications. There is an established need for nursery places in Hillingdon as mentioned in paragraph 7.11 of the Hillingdon Local Plan Part Two, however it is advised that the applicant engage with education authorities and registered providers of childcare / nurseries to establish the need for a nursery in this part of the borough and the suitability of the site for use as a nursery.

Cafe/Restaurant

The applicant is also proposing a 212 sqm cafe / restaurant (Class E) for public use. The compatibility of this use with the specialist housing in terms of amenity impacts on residents should be assessed.

Policy DMTC 4 states that proposals for restaurants will only be supported provided that they:

- Would not result in adverse cumulative impacts due to an unacceptable concentration of such uses in one area;
- Would not cause unacceptable disturbance or loss of amenity to nearby properties by reason of noise, odour, emissions, safety and security, refuse, parking or traffic congestion; and
- Would not detrimentally affect the character or function of an area by virtue of the proposed use or visual impact.

There are residential units to the east of the site and the site is located in a predominantly residential road, and the potential impacts on parking and the street scene as a result of this development should be appropriately assessed by the applicant.

POLICY OFFICER COMMENTS - MARCH 2021

Proposed C2 Provision

The additional evidence is noted and demonstrates that the proposed provision would contribute to

meeting the borough's London Plan annual benchmark for specialist older persons housing of 180 units per annum.

Car Parking

It is noted in the GLA's Stage 1 comments that given the PTAL level of this scheme it should be car free. It is noted that the parking standards in London Plan policy T6.1 apply to residential developments and there is a question of applicability to C2 housing. Given that Policy T6.1 refers to residential development rather than a specific use class the Guild Residences part of the development would be regarded as falling within the remit of the residential standards as a type of residential development. Separate standards would apply to the care home element of the scheme.

On the basis that an element of the scheme should be car free, the current provision of 76 spaces at approximately 0.5 spaces per unit is significantly above the car free requirement of the London Plan. However, it is noted that the development plan has changed during the lifetime of this application with the applicant previously working to the Local Plan maximum standards of 1-1.5 spaces per dwelling. This change in policy context would be a material consideration given that the applicant had sought to significantly reduce parking levels relative to the previous maximum standards. In addition, the applicant has highlighted that as many future residents will be looking to downsize from street properties, the ability to retain a private vehicle is likely to be an important consideration to residents who would ultimately be freeing up larger family homes. Some robust evidence supporting this position would be beneficial.

It is also noted that the proposed parking is managed solution with a concierge and that car owners will not have direct access to the car park. This is primarily due to the use of double car stackers in order to accommodate the applicant's desired level of car parking. The proposed use of stackers does suggest that the current level of car parking provision may have resulted in some operational compromises that also builds in a cost to future residents through the need to maintain the concierge service. Alternative options such as the provision of a resident's car club would appear one such solution to reduce the overall need for parking whilst ensuring good access to the use of a car is maintained. Evidence of regarding such a consideration should be provided.

Affordable Housing

Additional comments to be provided when further FVA review is received.

SUSTAINABILITY OFFICER

I have no objections to the proposed development subject to the following condition and S106 contribution:

Condition

Prior to above ground works, full details and specifications of the low and zero carbon technology to be used in the development shall be submitted to and approved in writing by the Local Planning Authority. These shall include the type, size and proposed location within the site of the low and zero carbon technology required to meet the CO₂ savings set out in the outline energy statement (Chapmanbdsp, Rev 2, September 2020). In addition, full details of the noise emissions associated with the Air Source Heat Pumps shall be provided along with any noise abatement technology to ensure noise pollution is avoided. The development must proceed in accordance with the approved plans, details and specifications.

Reason

To ensure that the development incorporates appropriate energy efficiency in accordance with

Policy 5.2 of the London Plan.

Section 106

The energy strategy shows the development as a whole to not comply with the requirements of the London Plan (zero carbon for residential, 35% co2 reduction for non-residential). Consequently, in accordance with Policy 5.2e an offsite solution is required to offset the shortfall onsite.

On commencement of works, the applicant should pay £103,680 to the Council for offsite carbon reduction measures.

SUSTAINABILITY OFFICER - MARCH 2021

The comments on energy for the Harefield Road scheme are as previously with a change to the report reference in the condition to (Chapmanbdsp, Rev 3, March 21) as well as a change to the S106 contribution to £99,473.

Overheating Assessment

Objection if further work cannot be secured by the developer. This relates to an overheating assessment which has become greatly reinforced in the new London Plan.

The energy assessment contains information on overheating. 5.2.2 presents the summary data regarding compliance. However, the applicant has used the Gatwick Airport data as opposed to the Heathrow Airport data as a representative data set. The GLA Energy Assessment guidelines states

The most representative weather data set for the project location should be used, as presented below:

- London Weather Centre data: the Central Activity Zone (CAZ) and other high density urban areas (e.g. Canary Wharf).
- London Heathrow airport data: lower density urban and suburban areas.
- Gatwick Airport data: rural and peri-urban areas around the edge of London.

It is not clear what impacts this would have on the assessment although it is acknowledged that there is limited contingency within the findings and therefore any increase in background temperature baseline may have an adverse impact on the results.

Furthermore, it is noted that whilst the development achieves compliance with the DSY1 requirements (although acknowledging the wrong dataset has been used) the assessment against DSy2 and 3 shows a series of failures. The draft GLA Energy Assessment guidelines state:

It is acknowledged that meeting the CIBSE compliance criteria is challenging for the DSY 2 & 3 weather files, although it is expected that in the majority of cases a significant proportion of spaces will be able to achieve compliance if passive measures are fully exploited. Where the CIBSE compliance criteria is not met for a particular weather file the applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans, and they should commit to providing guidance to residents on reducing the overheating risk in their home in line with the cooling hierarchy.

The overheating assessment shows a significant amount of failures against the DSY2 and 3 datasets (set against Gatwick Airport Data and not Heathrow Airport).

Given the nature of the building and its intended occupancy, there is a particular degree of vulnerability that requires further consideration prior to planning permission being granted. The applicant should in the first instance reassess the development using the correct Heathrow data given the development is in a lower density urban suburban area as opposed to peri-urban or rural where the Gatwick dataset is more appropriate. Finally, given the failures against the two additional Data years, the applicant should respond positively to the underlined requirement above to determine what design changes may be required to reduce the failures in CIBSE TM59 for the residential elements in particular.

TREES AND LANDSCAPING OFFICER - DECEMBER 2020

This site is occupied by two retail units (Wickes and Halfords) at the southern end of Harefield Road, situated to the north of the police station.

The existing buildings are set well back from Harefield Road, on elevated land beyond a landscaped car park which serves as a visual filter from the street and residential properties to the north.

There are no TPO or Conservation Area designations directly affecting the site, albeit the existing trees and planting contribute to the character and appearance of the area providing green infrastructure at the interface between the town centre and the residential areas to the north.

COMMENT

This application follows a number of recent pre-application meetings and submissions, including a site meeting with the project landscape architect and tree consultant (28/07/2020) to review a draft tree and landscape strategy.

This submission includes a tree report by WSP which reflects the outcome of our discussions. 45 trees which are on, or close to, the site have been identified and assessed, together with one group and one hedge.

There are no 'A' grade trees. 8 trees and 2 groups are 'B' category. 31 individual trees and the hedge are of poor quality, 'C' grade, which are not normally considered to be a constraint on development. 6 trees are very poor and this grade suggests that they should be removed in the interests of good management.

The arboricultural impact assessment (AIA) confirms that most of the 27 trees to be removed to enable the development are 'C' and 'U' grade trees, with just 2 x 'B' category; T26 and T39. Table 4.2 considers the other arboricultural impacts and recommends proposed mitigation measures.

A tree protection plan (TPM) and an arboricultural method statement (AMS) are provided in Appendix F. There is no objection to this tree strategy subject to the replacement of good quality trees in sustainable tree pits as part of a comprehensive landscape plan.

A stand-alone Landscape Design and Access Statement has been submitted, prepared by Andy Sturgeon Design, dated September 2020. The report describes the evolution of the landscape masterplan, the landscape design principles and the proposed masterplan. The main landscape features incorporate a Public Garden Square, a Residents' Roof Garden, Magistrate Court Gardens (at ground level), a Wildflower Roof and a Sedum Roof. Additional tree planting will line the shared pedestrian / route through the site and incorporate street tree planting on Harefield Road - technically outside the red line of the site?

An illustrative palette of hard and soft landscape materials is provided, together with illustrations of the various multi-functional character areas. A table of indicative management / maintenance schedules is provided in the appendix.

A Preliminary Ecological Appraisal, by WSP, makes recommendations to enhance wildlife and biodiversity, which should be incorporated within the landscape details.

RECOMMENDATIONS

1. There is no objection to the tree strategy or landscape masterplan proposals subject to details which can be submitted through conditions.
2. No Urban Greening Factor assessment has been submitted? This should be clearly shown on a diagrammatic plan with accompanying calculations. The GLA target figure for this mixed use development (primarily residential) is 0.4. If the figure falls below 0.4, additional green infrastructure will be required.
3. There remains concern about the connectivity, for pedestrians, between the site and the town centre which appears to be dominated by the 10m access road between Harefield Road and Warwick Place - an unattractive route for pedestrians? There is currently a 2.5m fall from the existing car park level to Harefield Road. Levels details are required to confirm that the pedestrian route will be accessible, comfortable and safe for all users.'

TREES AND LANDSCAPING OFFICER - MARCH 2021

Further to my previous comments of December 2020 and the receipt of amended drawings submitted on 10 and 11 March 2021, please find my observations.

1. The amended layout has resulted in a reduction of 12 units, from 194 - 182. Car parking spaces have been reduced by 4, from 80 -76.
2. Key landscape improvements have been enabled by setting back the development from the Harefield Road frontage by 2 metres and improving the accessibility and layout of the courtyard area and play area.
3. Cross-sections have been submitted to illustrate the site perimeter landscape treatments, including the access road, east boundary and Harefield Road frontage.
4. Part 3.0 of the Design & Access Statement, incorporates a Landscape Planning Addendum (parts 1-4 of 4) by Andy Sturgeon. This highlights seven specific changes (improvements) to the landscape strategy in response to previous concerns and the refinement of the site layout.
5. At 2.2 (p.9) it is confirmed that the access road trees will be supported by structural soil cells - providing the required soil volumes to support and sustain healthy tree growth.
6. At 2.3 the report illustrates the design intention for the Harefield Road frontage with 8 trees and lower-storey ornamental planting. This proposal will make a significant contribution to the character and appearance of the public realm.
7. At 3.1 the report provides a palette of proposed trees incorporating 10 different species, providing a range of forms and seasonal highlights.

The recent amendments provide significant improvements to the landscape layout, however, the success of this scheme will be subject to detailed design, the quality of implementation and establishment - and future management and maintenance.

RECOMMENDATION: No objection to conditions RES9 parts 1,2,3,4,5 and 6. Please add a bespoke condition requiring the 'the design and construction details, including the specification of growing medium, for all tree pits and green roofs'.

INDEPENDENT ACOUSTIC CONSULTANT CONCLUSION

An independent acoustic consultant was appointed by the Council to review the technical reports given the a noise sensitive development is being introduced on site.

Since noise from JR Autos was previously described as dominant, we suggested further consideration was given to this. RBA Acoustics has since revised the description and confirmed that it does not expect noise from JR Autos to cause any future issues. We've stated above that we feel it is questionable whether the survey was sufficient to form a firm conclusion, and so in the spirit of protecting both the future occupants and the operation of Penfield Estate, it is recommended that this is reviewed by a planning condition prior to completion.

Further consideration may still be required in terms of the siren noise since the relevant (L_{Amax}) threshold is only met with windows closed and yet the ventilation and cooling strategy has yet to be confirmed. This is the case generally at this stage, however, with the revised APR concluding "...a Level 2 AVO assessment in accordance with TM59 will need to be undertaken at a later design stage." At which point, the L_{Amax} levels can be considered together with the L_{Aeq} levels, as per the AVO Guide.

If, therefore, LBH is mindful to grant permission, conditions along the lines of the following are recommended:

- Details of the measures to control plant noise emanating from the site to meet the limits (and follow the associated guidance) within the Acoustic Planning Report(Revision 4) to be submitted to, and approved by, LBH.
- Details of an AVO Guide Level 2 assessment, accounting for both L_{Aeq} and L_{Amax} sound levels (including from sirens), and the measures to control external environmental noise ingress to meet relevant internal noise targets within habitable rooms during both ventilation and overheating conditions, to be submitted to, and approved by, LBH. The Level 2 assessment and measures should account for the overheating assessment and energy strategy, with any mechanical system noise generated within the habitable rooms being assessed and adequately attenuated. Full details of the associated noise survey data, modelling assumptions and calculations to be included.
- Details of sound level measurements undertaken at the location of the south-eastern elevation of the scheme, overlooking Penfield Estate, prior to occupation, sufficient to check the likely degree of impact or otherwise from any commercial noise(e.g. from JR Autos) in accordance with the Noise SPD/BS 4142 (and BS 8233, where applicable), to be submitted to, and approved by, LBH. Where the requirements of the Noise SPD are not met and/or an impact is expected based on the guidance on BS 4142, details of the noise control measures to be incorporated into the scheme to be included in the submission.

INDEPENDENT DAYLIGHT AND SUNLIGHT CONSULTANT CONCLUSION

An independent daylight and sunlight consultant was appointed to review the technical reports submitted in support of the application. The report concluded:

GIA have undertaken an independent review of the Report prepared by AY and submitted in support of the planning application to LBH. The review has not extended to undertaking our own modelling and technical analysis. Rather, the review assumes that the modelling and accuracy of the analysis undertaken by AY are accepted.

GIA accepts that the daylight and sunlight methodologies utilised by AY are valid, appropriate and in accordance with LBH's requirements.

The Report highlights four properties that experience transgressions of the criteria set out within the BRE Guidelines for daylight and sunlight impacts on neighbouring properties. These are Laburnum Court and 14, 18 & 20 Harefield Road. Overall, whilst there are daylight and sunlight impacts that constitute technical breaches of the BRE criteria for daylight and sunlight to neighbouring properties, GIA consider the impacts to be in line with the flexibility intended within the BRE Guidelines, the policy and guidance discussed, as well as the relatively

undeveloped nature of the existing site in the context of the overall planning balance. In many cases, the existing architecture of the properties inherently limits the daylight and sunlight availability to the windows and rooms.

The overshadowing assessment undertaken by AY shows that the BRE criteria for sunlight to amenity spaces is satisfied for both existing and proposed spaces.

The assessment of daylight amenity within the proposed scheme has been undertaken by notionally internalising the kitchens of the deep LKD rooms in order to demonstrate that the main living areas achieve good levels of daylight. Whilst GIA feels that an assessment of the rooms including the kitchens would demonstrate lower daylight values to the room as a whole, it is accepted that the assessment carried out by AY is representative of the daylight amenity to the main living areas of the rooms, which will be most-used by the occupants.

In terms of sunlight within the proposed scheme, there is a high level of compliance with the BRE criteria. Where windows do not meet the BRE criteria, the rooms are largely served by more than one window and would experience a good perception of sunlight overall. In a small number of instances, rooms are served by single windows that do not meet the criteria for sunlight. However, these are isolated and either face largely east, or are unavoidable if the scheme is to be built as proposed.

Overall, GIA considers the daylight and sunlight results for the proposed scheme and impacts on neighbouring properties to be within the flexibility intended within the BRE Guidelines and reasonable for the site given the need to make efficient use of land and optimise housing capacity. It is also pertinent that the site is largely undeveloped, resulting in low and unrealistic levels of existing obstruction to daylight and sunlight.

INDEPENDENT FINANCIAL VIABILITY REPORT CONCLUSION

Our revised appraisal shows that the scheme generates a positive land value of £3,078,000. We have also included a sensitivity analysis to model the impact of changes to build cost and sales values on the scheme's viability.

We welcome the inclusion of the event fee valuation by Guild and the acceptance of our valuation model of this element. Despite the amended changes highlighted above we acknowledge significant areas of agreement and some of our proposed amendments are those which have been agreed through compromise with the applicant on a similar proposed scheme on Epsom on which we are advising..

Benchmark Land Value

AY have adopted a Benchmark Land Value on the basis of an EUV+ approach for the site which we consider to be appropriate. We consider AY's latest position to be full and reasonable; they have adopted a Market Rent at the bottom of the range of the market evidence and a yield towards the top of the range of the evidence to reflect the short lease term. We consider this aspect of the scheme viability to be acceptable.

Proposed Scheme

The scheme proposals include the redevelopment of the site to provide a C2 care led scheme with a range of Guild Living products depending on the level of care required by the resident. The scheme now includes 182 units split, 153 Guild Living Residents, 5 Guild Care Residential and 24 no. Guild Care Suites in order of the care level requirements. We consider the GLR units are slightly under valued on the basis of the extensive community facilities being built and the premium

they drive over the C2 McCarthy and Stone comparable schemes which have a more limited care offer and a lower level of residents amenities.

We consider the Nursery value and the car parking values to be broadly reasonable.

The event fee model is based on a model we have previously negotiated with Guild as such we consider this element of the scheme viability to be acceptable. We have simply updated this model to reflect our proposed changes in the average unit market value to reflect our revised pricing.

Development Costs

Our Cost Consultant, Neil Powling has provided his cost report attached as appendix A. He considers the applicant's costs to be slightly high, we have adopted his revised build cost for the purposes of our appraisal.

Review Mechanism

We would expect review mechanisms to be included in this scheme given it falls far from the policy target requirements for 35% on-site affordable housing, split 70% social rent and 30% intermediate tenure. Uxbridge Town Centre is in our view an up-and-coming area and there is scope for the residential values to significantly improve in the near future and our in-house view is that it is highly likely sales values will increase over the project period.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Loss of Existing Retail Units

The site is located within Uxbridge Metropolitan Town Centre, outside of the primary and secondary shopping areas and the site currently comprises two large footprint single storey retail warehouse buildings with approximately half of the site used for surface car parking.

Part D) of Policy DMTC 2 of the Hillingdon Local Plan: Part Two (2020) states that outside of defined primary and secondary areas, proposals for a change of use from retail uses will be permitted, provided the change does not result in the loss of an essential local service.

The application site comprises two retail stores; Wickes and Halfords with associated parking. Wickes is a DIY and hardware retailer which is designed for trade customers (Use Class E), however it also serves a mixture of retail sales to visiting members of the general public. Halfords is an auto spares and accessories retail store which includes a sizable amount of cycle (and associated accessory) sales. Neither stores are considered to be essential shops as defined by paragraph 3.14 (pharmacy, post office, grocer, baker, butcher, greengrocer and newsagent) of the Hillingdon Local Plan: Part Two (2020).

The proposal would result in a loss of 3,355 sq.m existing retail floorspace. The proposal seeks to replace the commercial provision with small-scale commercial, leisure and community uses at ground floor level which are intended to be publicly accessible.

The Applicant has considered whether the loss of retail provision from the application site will affect the availability of the goods that these stores sell. It is noted that there are 6 DIY stores and 7 car and automotive stores within a 5 mile radius of the site indicating that there is sufficient alternative retail provision within the locality of the site.

The primary function of Part D of Policy DMTC 2 is to protect essential shops and the current uses on site are not considered to be essential shops, there are no policies affording the existing shops protection, and on this basis, the loss of the existing shops is considered acceptable and it is considered that their loss would not undermine the vitality and viability of Uxbridge town centre.

Older Persons Housing and Care Home Accommodation

Paragraph 59 of the NPPF (2019) notes 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.

Policy H13 of the London Plan (2021) emphasises the importance of increasing the provision of specialist housing for older people in view of London's demographic changes and housing needs, to improve the quality of the existing stock across London and to encourage downsizing. The London Plan (2021) has set an indicative benchmark for specialist housing provision for older people which in Hillingdon is between 155 to 180 units per annum.

Policy H13 of the London Plan (2021) does not define or distinguish care home accommodation from other forms of specialist housing for older people on the basis of the Use Class Order or by reference to Class C2 or C3 uses. Instead, the policy defines care home accommodation as having certain specific attributes in terms of the needs of occupants and the way it is managed, with care homes providing accommodation for people who require nursing or personal care and where there is no separation between the personal care and the accommodation provided.

Policy DMH 8 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

- A) The development of residential care homes and other types of supported housing will be permitted provided that:
- i) it would not lead to an over concentration of similar uses detrimental to residential character or amenity and complies with Policy DMH 4: Residential Conversions;
 - ii) it caters for need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;
 - iii) the accommodation is fully integrated into the residential surroundings; and
 - iv) in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.

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

The Council's Housing Market Needs Assessment (2016) (HMNA) projects that there will be a demand for: 640 traditional sheltered housing units; 480 'extra care' units; and, 220 'sheltered plus or enhanced sheltered' units over the period 2014-36.

Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) states:

"care" means personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment.

The Planning Practice Guidance states that when determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration should be given to the level of care and scale of communal facilities provided.

The application proposal seeks to provide 'specialist older persons housing' available to those above 65 and in need of at least 2.5 hours of care a week. In terms of the model being offered by the applicant, the 'specialist older persons housing' comprises accommodation that has been specifically designed and managed for older people. This application seeks to provide 3 types of accommodation as part of the development which are summarised below:

Guild Living Residences: Specifically designed for older people aged 65 years and above and which would be secured by tenancy agreements in which a minimum of 2.5 hours of personal care/support per week would be provided. These units would provide specialist accommodation for older people requiring lower levels of care to enable independent living. Care provided would be secured via separate contracts or agreements, and would effectively be separate from the accommodation, which would be subject to leasehold, freehold or tenancy agreements, thereby offering residents a choice as to who provides the care.

Guild Care Residences: Functions as traditional care home accommodation where personal care and accommodation are provided together as a package. The units are available to rent and are restricted to over 65s (unless they have a partner who would also be living in the residences). Typically, there would be at least 3 hours of care per day for those with mobility, nursing or cognitive needs, but could also include companionship and company.

Guild Care Suites: The suites would function very similarly to GCR with an added level of care. End of life needs could be managed here, as can nursing and dementia needs.

The proposal is responding to a growing need identified in London for specially designed and built housing for older people with a range of care and support services to allow them to live as independently as possible. The proposal seeks to target an ageing population who currently live in owner occupied family-sized houses and have limited opportunities locally to downsize into purpose-built accommodation which is specifically designed to cater for the long term care needs of elderly residents. The development would provide such a facility.

The proposed units would be either wheelchair-accessible or wheelchair adaptable which are supported by a range of health and wellbeing, catering and service facilities. The communal facilities in this case include a health/wellbeing centre, resident lounges, parking for cars and wheelchairs/mobility scooters, and communal gardens and spaces. There would be a concierge service.

The flats would be available on a restricted basis. Future occupants would need to be over 65 years old. Guild Care Residence primarily contains self-contained dwellings that have all

the facilities for independent living, are sold on long leases and could be occupied without any dependence on communal facilities. Although there could be a high level of care over time to the degree that it could be similar to that provided in a Class C2 nursing home, the baseline of care stated for this model is 2.5 hours per week and for some, this may not change much over time. Should the occupants of the Guild Care Residences require more care in the future, this can be provided on site.

Guild Care Suites and Guild Care Residences would operate as a care home whereby personal care and accommodation are provided as a package.

The development would make a contribution to meeting supported living provision in the Borough, which carries significant weight in favour of the development.

There is no in principle objection to the redevelopment of the site to provide specialist older person housing subject to compliance with all other material considerations. Should the application be considered acceptable, a clause within a Section 106 legal agreement is required which restricts occupancy of the units to over 65yrs with a minimum of care package of 2.5 hours a week. Without this the proposed Guild Care Residences would not fall within Use Class C2 and would instead be considered to fall within Use Class C3.

Nursery

The application seeks to provide a nursery at ground floor level measuring upto 300 sq.m. Policies S1 and S3 of the London Plan (2021) support high quality social infrastructure is generally supported subject to local and strategic social infrastructure needs assessments.

Policy S3 of the London Plan (2021) states that development proposals for education and childcare facilities should meet a number of criteria listed in the policy. This includes:

- locating facilities in areas of identified need;
- locating facilities in accessible locations;
- locating entrances and playgrounds away from busy roads, with traffic calming at entrances;
- link to existing footpath and cycle networks to create healthy routes to education and childcare facilities;
- encourage the shared use of services between early years and health and social care providers;
- ensure that facilities incorporate suitable, accessible outdoor space; and
- local facilities next to parks or green spaces, where possible.

Policy DMCI 2 of the Local Plan: Part Two (2020) states that proposals for the provision of new community facilities will be supported where they:

- Are located within the community or catchment that they are intended to service;
- Provide buildings that are inclusive, accessible, flexible and which provide design and space standards that meet the needs of intended occupants;
- Are site to maximise shared use of the facility, particularly for recreation and community uses; and
- Make provision for community access to the facilities provided.

There is an established need for nursery places in Hillingdon as mentioned in paragraph 7.11 of the Hillingdon Local Plan Part Two (2020). The applicant engaged with a local childcare provider who has written in support of the application noting the existing nursery

provision is oversubscribed. The proposal would provide a nursery in a highly accessible location and it would allow for informal interaction between different age groups within the public open space and landscaped courtyard, drawing the public and wider community into the site. The provision of a nursery is in accordance with the objectives of Policies S1 and S3 of the London Plan (2021) and Policy DMCI 2 of the Local Plan: Part Two (2020).

Cafe/Restaurant/Bar/Wellness Centre

Policy SD6 of the London Plan (2021) strongly supports mixed-use developments that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

Policy DMTC 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals for restaurants will only be supported provided it would not result in adverse cumulative impacts due to an unacceptable concentration of such uses in one area.

The application proposes a cafe / restaurant/bar and wellness centre (Class E) for public use. The proposed restaurant/cafe/bar would primarily serve the residents of the development. The facilities are also available to members of the public, subject to availability. The proposal would create an active frontage overlooking the public open space. The provision of the wellness centre and flexible restaurant/cafe/bar meets the objectives of Policy SD6 of the London Plan (2021) which promotes mixed use developments. It is not considered the proposal would result in the over concentration of such uses in this area, rather it complements the specialist older person accommodation proposed.

UNIT MIX

Policy H10 of the emerging London Plan (2021) outlines that the nature and location of the site needs to be taken into account, with a higher proportion of one and two bed units generally being more appropriate in locations with higher public transport access and connectivity.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.

The proposal includes the following mix:

Guild Living Residence: 9 x studios and 26 x 1 bed, 114 x 2 bed and 4 x 3 bed.

Guild Living Care Residences: 5 x 1 bed.

Guild Care Suites 24 x 1 bed.

The proposed unit mix promotes housing choice by providing a range of housing, enable downsizing to free-up larger family sized homes and contribute to an identified need for older persons' housing. Given the development is specifically providing for specialist older persons accommodation, the proposed unit mix is considered acceptable.

7.02 Density of the proposed development

Policies H1 and SD6 of the London Plan (2021) encourage the comprehensive mixed use redevelopment of to enable the provision of high density residential and mixed use

development in accessible locations, whilst also supporting the overall vitality of town centres. Policies D1 to D4 of the London Plan (2021) place greater emphasis on a design-led approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure.

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states Hillingdon will apply the density standards in a flexible manner, according to local circumstances. It recognises that areas such as Uxbridge town centre are more suited to higher density development, which in some cases may exceed London Plan Standards.

Numerical density standards have recently been removed from the adopted London Plan 2021 to avoid the quantitative standards being applied mechanistically. To this end, the application site comprises a town centre brownfield site where a suitable design led approach should deliver the best use of the site subject to accordance with all other planning policies. The current proposals are not considered to be providing a suitable design led approach to delivering the best use of this site.

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

The development site is undesignated however it is situated in a sensitive location surrounded by heritage assets. To the south is the Old Uxbridge/Windsor Street Conservation Area which is focused on the High Street. The north side is closest to the site has a run of grade II listed buildings, numbers 118-123. Opposite on the south side are the grade II listed The Cedars and the Old Bank House. An alley leads off to the north to Beasleys Yard where there is the Grade II listed Watts Hall. There is a further run of listed buildings commencing on the other side of the alley, numbers 126-135 High Street and these are terminated by the grade II The Crown and Sceptre Public House (now Whelans). Opposite the site on the Harefield Road is the locally listed Uxbridge Magistrates Court and to the north east the North Uxbridge Area of Special Local Character.

ARCHAEOLOGY

Section 16 of the NPPF (2019) and Policy HC1 of the London Plan (2021) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. Paragraph 189 of the NPPF (2019) states applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

The Greater London Archaeological Advisory Service (GLAAS) were consulted on the application who raised noted the application site lies in an area of archaeological interest. The applicant's archaeological desk-based assessment shows that remains of a Bronze Age settlement and land boundary ditches were found during an investigation conducted in 1993-4. These are part of an extensive Bronze Age landscape covering much of the

Lower Colne Valley. There appears to be a trackway aligned on the natural crossing point over the Colne at the site of the medieval bridge. The eastern and central parts of the site were investigated and ground levels subsequently reduced so there is very limited potential in these areas. However, the western part of the site was not investigated and may have greater surviving potential. Any surviving remains could be harmed by the proposed new build.

Following a review of the Greater London Historic Environment Record, GLAAS advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. A two part condition is therefore recommended. This would require an evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. Should the application be considered acceptable, it is recommended that required condition is secured to ensure archaeological interest within the site is not disturbed or appropriately mitigated.

LISTED/LOCALLY LISTED BUILDINGS

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 'Act') require the Local Planning Authority (LPA) to pay special regard to the desirability of preserving listed buildings, their setting and any architectural features that they possess.

The NPPF (2019) requires its own exercise to be undertaken as set out in its chapter 16. Conserving and enhancing the historic environment. Paragraphs 184-202 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 196 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy HC1 of the London Plan (2021) requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, including registered historic parks, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy HE1 of the Local Plan: Part One (2012) states the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens and historic landscapes, both natural and designed.

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

- A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:
 - i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
 - ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
 - iii) it makes a positive contribution to the local character and distinctiveness of the area;
 - iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;

- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

The impact of the proposal on the statutory Listed Buildings on the High Street have been considered and given their relative distance from the site, the proposal is not considered to impact on or harm the setting of the listed buildings or their significance.

The amended plans and visuals show a further setback by 2m along Harefield Road, the reduction to 7 storeys with further setbacks to the massing. The overall height of the building has also reduced.

The amended proposal has reduced the development's dominance on the street frontage as well as mitigated against its imposing presence. The proposals now allow for more landscaping to the front of the building.

The setback allows for more substantial street trees, adequate pavement widths as well as additional landscaping to help improve and soften the developments setting. The amended proposal is considered to relate better to the site's context.

The amended proposal is considered to respond appropriately to the locally listed Uxbridge Magistrates' Court. The development is not considered to result in any harm to the surrounding listed and locally listed buildings or their setting.

CONSERVATION AREA/ AREA OF SPECIAL LOCAL CHARACTER

In considering development affecting a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that local authorities shall pay special attention to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area. The duties imposed by section 72 of the Act are in addition to the duty imposed by section 3(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.

Paragraphs 184-202 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 196 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy DMH4 requires new development, on the fringes of a Conservation Area, to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness.

As noted above, the Old Uxbridge/Windsor Street Conservation Area lies to the south of the site. To the south-west of the site lies the Rockingham Bridge Conservation Area, which contains several locally listed buildings and a number of buildings of merit.

Further to the west lies the Uxbridge Lock Conservation Area, whose character and appearance derives from its semi-rural nature and the variety of historic buildings and structures associated with both the Grand Union Canal, built through the area in the 1790s, and the Oxford Road, a modern trunk road built along the line of the historic London to Oxford highway.

To the north and north-east of the site lies the North Uxbridge Area of Special Local Character, which is a locally-designated heritage asset.

The revised proposed which reduced the height and massing of Block B has reduced the impact on the Conservation Area and the Area of Special Local Character. The revised proposal would not result in harm to any designated or non-designated heritage assets.

7.04 Airport safeguarding

Policy DMAV 1 of the Local Plan: Part Two (2020) notes that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the relevant airport operators on proposals in safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

A response to this application was received from NATS, Heathrow Aerodrome Safeguarding and the Ministry of Defence who raised no objection to the application subject to the inclusion of conditions requiring red static omni-directional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane during construction and a Bird Hazard Management Plan.

7.05 Impact on the green belt

The application site does not fall within land that is designated as Green Belt. As such, the proposal would not impact the Green Belt.

7.07 Impact on the character & appearance of the area

Paragraph 95 of the NPPF (2019) requires planning decisions to promote public safety and take into account wider security and defence requirements by appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.

Paragraph 108 of the NPPF (2019) in assessing specific applications for development, it should be ensured that safe and suitable access to the site can be achieved for all users. Paragraph 110 of the NPPF (2019) requires developments to give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas and create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards

Paragraph 127 of the NPPF (2019) requires planning decisions to ensure developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

Paragraph 130 of the NPPF (2019) states permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

Paragraph 131 of the NPPF (2019) provides that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of

sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policies D1-D3 of the London Plan (2021) requires all development to make the best use of land by following a design led approach that optimises the capacity of sites. The policies set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages and improving permeability and overlooking.

Policy D8 of the London Plan (2021) requires development proposals to ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Paragraph D in particular, expects development proposals demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.

Policy D8, paragraph E of the London Plan (2021) seeks to ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible.

Policy D8 (N) of the London Plan (2021) requires developments to ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines.

Policy D9 of the London Plan (2021) requires that development proposals, where tall buildings are being provided, should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm and that entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.

Policy T6.5 of the London Plan (2021) notes disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.

Policy T7 of the London Plan (2021) requires development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

Policy BE1 of the Local Plan: Part One (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 10 of the Hillingdon Local Plan: Part Two - Development Management

Policies (2020) be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) re-emphasises the importance of good design in new development by A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure; B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space; C) safeguarding the development potential of adjoining sites and D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 of the Local Plan: Part Two (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The National Design Guide Planning practice guidance for beautiful, enduring and successful places (2019) guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance which has been produced in response to the National Planning Policy Framework which makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve.

Under the Context (Enhances the Surroundings) Chapter, paragraph 40 (p 11) of National Design Guide Planning practice guidance for beautiful, (2019) notes that well designed new development can respond positively to the features of the site itself and the surrounding context beyond the site boundary. Features include: the existing building development, including layout, form, scale, appearance, details and materials; landform topography, geography and ground conditions; access movement and accessibility; views inwards and outwards.

Under the Identity Chapter, paragraph 52 (P15) it notes that well designed new development is influenced by: an appreciation and understanding of vernacular, local or regional character, including existing built form, landscape and local architectural precedents; the characteristics of the existing built form. This includes the height, scale, massing and relationship between buildings as well as the scale and proportions of buildings.

Under the Built form Chapter, Paragraph 65 (P19) it notes that: Built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context.

Paragraphs 124 - 133 of the NPPF Draft text for consultation (2020) emphasises the need to build beautifully and that makes it clear that development that is not well designed should be refused.

The existing site is comprised of low-lying retail units that are circa three-storeys

(equivalent in height, with a large open front court area for car parking, access, servicing and landscape. The existing buildings cover approximately two-thirds of the site area and are significantly set back from the western boundary. There is mature landscape along the northern and western boundaries that help to integrate the site with the surrounding suburban context and soften the impact (screening) for the residential houses that abut the site. The site itself is located on the north-western edge of the town centre boundary.

Height/Scale/Massing

The proposed development comprises two 'L-shaped' blocks with a podium and public space to the centre. The western / southern block (Block A) fronting onto Harefield Road is three to 7-storeys in height with three to 5-storeys at the lower levels along Harefield Road. The north / eastern block (Block B) is 4-7 storeys. The site resides within a predominantly edge of centre setting comprising 2-storey houses and some 3-4-storey retail, office and civic buildings, further south and eastwards.

The proposal would intensify the developed nature of the site. Built form would cover most of the site with heights ranging from 3- 7 storeys. The development would be a prominent building within this part of the townscape being seen within kinetic views as one moves through the area and will also will be seen within gaps between buildings and from the rear gardens, service yards and access roads in close proximity to the site.

Following a review of statutory and comments from neighbouring residents, the proposal was amended to reduce the height of the development across the site by lowering all floors by one brick course and removing a storey from the eastern part of the site. The massing has been stepped back from Harefield Road and the building line along Harefield Road has been setback by a further 2m.

There are significant concerns with the height and bulk of the southern part of Block A which rises to a height of 7 storeys. It is considered that this height and massing fails to provide an appropriate and respectful transition between the edge of town centre context to the suburban context to the north of the site. The massing, remains bulky and visually incongruous in the well-established modest suburban context to the north of the site and the much more modest municipal buildings and high street areas to the south and west. The proposed building would be significantly higher than its adjoining neighbours and fail to provide an appropriate transition between the town centre and the suburban context to the north.

Whilst the reduction in height and massing, has lessened the impact of the development on this part of the townscape, the height of the southern part of Block A remains visually prominent in townscape views. Overall, the height and massing proposed is considered inappropriate in view of the site's surrounding context and edge of town centre location. The application is contrary to Policies D1-D3 and D8 of the London Plan (2021).

Policies DMHB10 of the Local Plan Part 2 (2020) and Policy D9 of the London Plan (2021) relate to Tall Buildings and this development would be considered a tall building in so far as it exceeds 6 stories in height (Policy D9 of the London Plan 2021) and is taller than its surroundings (Policy DMHB10 of the Local Plan Part 2 (2020)). Whilst the sites location in Uxbridge town centre is considered to be suitable in principle for tall buildings, the site is on the outer limits of Uxbridge town centre and adjoins 2 storey suburban housing therefore the site context is not suitable to provide the scale height and massing proposed as it fails to respect its surrounding context.

Layout

The proposed development comprises two 'L-shaped' blocks with a podium and public courtyard space to the centre. The proposal provides a frontage along Harefield Road with active residential frontages with individual front door entrances set behind a landscaped front boundary. The main entrance into the site is via an internal road which leads to the porte cochere. The internal road runs from the western side of the site off Harefield Road, it would adjoin the southern part of the site leading to Warwick Place. The internal access road (including footway, road and landscaping) has a width ranging from 8.6m to 22m (as it turns the corner).

All vehicular, pedestrian, cyclist, mobility scooter access is taken from the internal access road. The internal access road would facilitate 16 on-street car parking spaces including a dedicated minibus parking bay. All drop off, pick ups, delivery, waste collection, attendance by the emergency services, and servicing is taken from the one way internal access road which also includes landscaping and street trees.

The potential for the Police Station to come forward for redevelopment has been considered, and Officers are satisfied that the proposals would not blight any future proposals on the Police Station site.

The proposed on-street car parking is provided along the length of the internal road, only one footway is provided. Parts of the footway would be reduced to 1.3m in width. Whilst it is acknowledged that the ground floor layout has been amended slightly to increase the very narrow width of the footway, this has not overcome the compromised layout of the internal access road, particularly given the intended uses at the site. The layout suffers from an under-provision of appropriate footpath width leading to the main entrance of the site which is of concern given the intended uses within the proposed development and the need for the development to fully accommodate the future elderly and vulnerable users.

The on-plot car parking comprises of undercroft stacker valet parking for residents and the aforementioned on-street car parking. The 16 on-street car parking spaces are for use by the nursery staff, nursery drop off/pick up, visitors, nurses, carers and cars being transferred to and from the valet parking. The applicant has provided a car parking management plan which outlines its intended use on a daily basis. Great reliance is placed on visitors (including blue badge holders), carers and nurses booking a car parking space in advance of their arrival. Furthermore, the expedient operation of the on-street car parking is reliant upon some of the car parking spaces serving more than one set of user at different times in response to demand. For example, to cater for peaks in nursery pick up/drop off traffic 2 valet parking spaces, 1no, visitor space and the Porte Cochere would be brought into use. Similarly, the Porte Cochere would serve many users including nursery pick up/drop off, smaller and short term deliveries, resident pick up/drop off and ambulances.

As well as a booking system, the car parking management plan place great reliance on the deployment of concierge staff members who would be available 24 hours a day 7 days a week every day of the year. The concierge staff members will be responsible for meeting and greeting residents both when they wish to collect and return their cars. They would park and remove cars from the stackers and if the person is disabled load or remove the wheelchair prior to the car being parked or removed from a stacker. At peak times the concierge would also direct visitors to vacant car parking spaces.

Because of the deficiencies in the layout of the site, the use of the car parking spaces needs to be carefully managed. Great reliance is placed on booking a car parking space in advance of arrival, allocated car parking spaces being redeployed to cater for difference users and the use of a team of concierge staff members. With good layout design such a complex parking management plan would not be necessary. However, it fails to explain how the site could facilitate the required number of movements on the internal access road in order for it to function which is a significant concern given the intended uses.

There are also significant concerns that access is permitted from Harefield Road only, as such if bays are occupied, the proposal would require the concierge valet attendants to circulate around the access road and back in via Harefield Road. This would increase the intensity of use of the internal access road and place further demands upon the concierge time. To ensure the availability of a concierge at all times to carry out the tasks mentioned above there would need to be spare capacity in the number of concierge members of staff working at anyone time to cater for peaks in activity and the demand for their services.

In terms of its layout, the proposal would fail to provide appropriate amenity for future residents. By this, it is meant that residents would be expected to park their cars at the dedicated drop off bays, including the accessible bays. Thereafter, they are expected to cross the road and hand in their keys to a concierge, this is followed by an onward journey on foot to their flats which could be upto 80 or 100m and/or across multiple floors. The layout fails to provide convenient access to the residential entrances for future residents.

Owing to the layout of the internal access road, and the quantum of development and the intended uses, this would provide a contrived public realm. The internal access road is intended to serve multiple users and visitors which could give rise to a conflict in movement which is especially a concern given the vulnerable users of the proposed development.

It is unclear how the servicing and delivery arrangements would work in practice. If an online delivery or groceries or goods was made, it is unclear how this is to be managed. It would place a significant burden on the drop off bays at the porte cochere which would be used for deliveries, nursery pick ups and drop offs and emergency vehicles.

Given the inclusion of a double stacked car parking solution, there would also be a significant reliance on the concierge to ensure all cars are parked at an appropriate time, to manage the internal access road to ensure the free flow of traffic and to support residents. The significant reliance on the managed system would require the site to be staffed and managed on a 24 hour basis throughout the year, without which the proposal could fail if the site was not managed on an ongoing basis. The management of the arrangement proposed could not be secured in perpetuity as such it is an unsustainable form of development that fails to incorporate the principles of good design to serve the future occupants of the development.

Detailed Design and Materials

The architectural and material quality of the proposed scheme is considered acceptable given the site's context. The detailed design includes different shades and textures of red brick proposed, alongside corrugated dark brown aluminium cladding and window frames.

For the reasons outlined, the proposed scale and massing fails to transition appropriately between this edge of town centre location and the suburban context to the north of the site.

The proposal fails to incorporate principles of good design, the layout of the site and the internal access road would result in a poor quality public realm which is dominated by car parking. It fails to prioritise pedestrians and other vulnerable road users. The development fails to provide usable and convenient access to vulnerable users and due to its reliance on concierge, the proposal fails to provide a sustainable form of development. The proposal is considered contrary to Policy BE1 of the Local Plan: Part One (November 2012), Policies DMHB 10, DMHB 11 and DMHB 12 of the Local Plan: Part Two Development Management Polices (2020), Policies D1-D3, D8, D9, T6.5 and T7 of the London Plan (2021) and Paragraphs 95, 108, 110, 127 and 130, 131 of the NPPF (2019) and NPPF Draft text for consultation (2020).

7.08 Impact on neighbours

Policy BE1 of the Local Plan: Part One (2012) requires developments to be appropriately designed so that they do not adversely affect their surroundings or the local character.

Policy DMHB 11 of the Local Plan: Part Two (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The nearest residential units affected by the development are the residential units to the north, namely; 14 to 20 (even) Harefield Road, 13-51 Lancaster Road and to the east namely; Nos 2-32 Wilmar Close and Laburnum Court, 9 Harefield Road to the west.

PRIVACY

Building A is situated 22.2m from Laburnum Court, 9 Harefield Road to its west, separated by Harefield Road and 28m from the nearest habitable room windows at Nos 14-16 Harefield Road. Whilst it would be situated 19.2m from No. 18 Harefield Road, it is positioned at an oblique angle. It is therefore concluded that there would be no direct overlooking between habitable room windows of Building A and neighbouring properties.

Building B would be located 43m from the nearest habitable room windows on Lancaster Road and 51m from the nearest habitable room windows on Wilmar Close.

It is noted that in response to the consultation, concerns have been raised in relation to the perception of overlooking between the 2 proposed balconies on the northern elevation and the rear of the properties on Lancaster Road. Should the application be considered acceptable, a condition would be secured requiring details of the proposed balconies to provide a privacy screen to mitigate against overlooking into No. 18 Harefield Road and treatment to mitigate against the perception of overlooking towards the properties and gardens along Lancaster Road.

Neighbouring dwellings and future occupants would not suffer from unacceptable loss of privacy as a result of the development.

DAYLIGHT/SUNLIGHT

The submitted daylight and sunlight report has been reviewed by an independent Daylight and Sunlight consultant appointed by the Council.

With regards to Daylight and Sunlight impacts on neighbouring properties, the independent consultant noted the existing site comprises of a low-rise, warehouse-style retail building, which is divided into two units. The units occupy approximately half of the site area, with

the other half consisting largely of a car park. Given the low rise and undeveloped nature of the site, neighbouring properties presently enjoy high levels of daylight and sunlight amenity. It is therefore inevitable that there will be breaches of the criteria set out within the BRE Guidelines where any meaningful massing is proposed. The independent consultant has considered whether the breaches of the BRE criteria is within the flexibility the guidelines and whether the proposal is acceptable in the context of the wider planning considerations.

The independent consultant found that the two windows that do not meet the BRE criteria for sunlight, located within 21 Lancaster Road and 12 Wilmar Close. However the shortfall represent transgressions that should be acceptable overall as there are absolute changes that would not be noticeable, retained annual sunlight that exceeds the criteria, and/or there are additional windows serving the rooms that exceed the criteria.

4 properties that do not demonstrate full compliance with the daylight and sunlight criteria set out within the BRE Guidelines these are at Laburnum Court, 14 Harefield Road, 18 Harefield Road and 20 Harefield Road.

With regards to Laburnum Court, the independent consultant notes 40 (85%) of the 47 windows assessed will satisfy the BRE Guidelines for Vertical Sky Component (VSC). The remaining seven windows serve two living rooms, two kitchens and three bedrooms, all of which are single-aspect and served by a single window. The independent consultant considers that whilst there are alterations in daylight to this property as a result of the proposed scheme, these are to be expected given the existing architecture of the property and the undeveloped nature of the existing site. Overall, the independent consultant considered that the daylight and sunlight impacts to this property should be acceptable.

With regards to 14 Harefield Road, 2 windows, located at ground and first floor level and serving a kitchen/dining room and unlabelled room (assumed bedroom), respectively, directly face the undeveloped car park part of the site and are situated very close to the site boundary (noted to be "less than 1.5m"). These windows and rooms are expected to experience breaches of the BRE Guidance if any meaningful development were to be implemented on the site. For daylight, 1 of the 6 windows assessed will satisfy the BRE Guidelines for VSC. 4 of the remaining 5 windows serve a single kitchen/dining room. 1 window is directly facing the vacant part of the site in the existing scenario. It experiences a 70.6% reduction in VSC and retains 6.4% VSC in the proposed scenario. However, the window is a secondary window to a dual-aspect kitchen/dining room, with windows providing mitigating light and achieving at least 25.6% VSC. The remaining window, serves a bedroom and directly faces the vacant part of the site, experiences a similar reduction of 70.6% VSC and retains 10.8% VSC upon construction of the proposed scheme. For sunlight, 5 (83%) of the 6 windows assessed will satisfy the BRE Guidelines for Annual APSH. None of the six windows assessed will satisfy the BRE Guidelines for Winter APSH. The window that does not meet the annual sunlight criteria retains 18% APSH against the BRE target of 25% and serves the aforementioned living/dining room, which is served by mitigating windows that exceed the BRE criteria (between 29% and 34% APSH). Of the windows that do not meet the BRE criteria for winter sunlight, two are understood to serve bedrooms and are considered least important when compared to other uses. Both retain very high annual sunlight levels, in excess of the BRE target. The remaining four windows serve the aforementioned kitchen/dining room, resulting in a good overall perception of winter sunlight. The independent consultant considers that whilst there are alterations in daylight and sunlight to this property as a

result of the proposed scheme, these are to be expected if any meaningful massing is to be developed on the site owing to its undeveloped nature. Overall, the independent consultant advises the daylight and sunlight impacts to this property is acceptable.

With regards to 18 Harefield Road, for daylight, 14 of the 16 windows assessed will satisfy the BRE Guidelines for VSC. The remaining 2 windows serve a kitchen/dining room and a room within an outbuilding and experience reductions of 32% and 34.8%, respectively. The independent consultant advises the daylight and sunlight impacts to this property is acceptable.

With regards to 20 Harefield Road, all of the 10 windows assessed will satisfy the BRE Guidelines and the independent consultant advises the daylight and sunlight impacts to this property is acceptable.

OVERTSHADOWING

The BRE Guidelines recommend that at least half of an amenity space should receive at least two hours of direct sunlight on the Spring Equinox (21st March). For existing spaces where the existing sunlit area is less than half of the space, the area that receives two hours of sunlight should not be reduced by more than 20% (it should retain 0.8 times its former value). The gardens that could be impacted by the development are: 14 to 20 (even) Harefield Road, 13 to 51 (odd) Lancaster Road and 2 to 12 Wilmar Close. The proposal all of the gardens assessed will meet the criteria set out within the BRE Guidelines.

To conclude, the impact to the level of daylight and sunlight has been fully considered following the submission of a daylight and sunlight report, which highlights minimal transgressions, which are considered acceptable. The 4 properties that experience transgressions of the criteria set out within the BRE Guidelines for daylight and sunlight impacts on neighbouring properties. These are Laburnum Court and 14, 18 & 20 Harefield Road. Whilst there are daylight and sunlight impacts that constitute technical breaches of the BRE criteria for daylight and sunlight to neighbouring properties, the impacts are in line with the flexibility intended within the BRE Guidelines, planning policy and guidance taking into account the relatively undeveloped nature of the existing site in the context of the overall planning balance.

The independent consultant has advised that in many cases, the existing architecture of the properties inherently limits the daylight and sunlight availability to the windows and rooms. The overshadowing assessment undertaken shows that the BRE criteria for sunlight to amenity spaces is satisfied for both existing and proposed spaces.

The protection of neighbouring privacy from overlooking has sufficiently been mitigated through design and relevant planning conditions. Neighbouring amenity is not considered to be unduly harmed by the development.

7.09 Living conditions for future occupiers

RESIDENTIAL QUALITY

Policy D6 of the London Plan (2021) provides minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all residential accommodation that is self-contained.

Of the Guild Living Residences, 97 (63 %) of the proposed units are single aspect and 56

(37%) of the proposed units are dual aspect. The site is constrained and the arrangement of units provides the most efficient layout. This on balance considered acceptable. The proposal includes good floor ceiling heights at 2.6m.

The 153 Guild Living Residences and Guild Care Residences which are studio, 1-bedroom, 2-bedroom and 3-bedroom sized self-contained residential units and would all exceed minimum internal space standards and all habitable rooms have outlook.

The majority of the units would not have access to private amenity space with high unit to core ratios. The overall design approach is considered is on balance acceptable in this particular instance, given the site is constrained which precludes the inclusion of balconies facing directly onto and overlooking rear gardens to the north, as well as townscape constraints along Harefield Road. Additional staircases have been provided for fire safety reasons. Overall, the proposal provides an acceptable living conditions for future occupants.

GUILD CARE SUITES

Care home accommodation is not subject to these standards as it is not self-contained housing, this would be regulated by the CQC and based on the proposed Guild Care Suite units based on their layout are considered acceptable.

OVERLOOKING

For the vast majority of the site, the proposal has been designed to ensure there are no habitable room windows within 21m of each other, in accordance with policy DMHB11. Where there is a distance of 20m between habitable room windows along the southern part of the site (above the porte cochere), the proposal includes obscure glazed windows to mitigate against direct overlooking between habitable room windows.

The proposal includes at least 1.5m defensible space at ground floor level between habitable rooms for each unit and the public realm and at least 1.5m between habitable room windows and communal amenity terraces. Overall the internal layout and orientation of each unit provides an acceptable quality living space for future residents.

DAYLIGHT/SUNLIGHT

In terms of the internal levels of light to the future residential units, a review of the daylight and sunlight report identifies all proposed units would satisfy or exceed the suggested minimum target ADF. The proposed development will perform well in daylight terms. The proposed kitchens would be reliant upon artificial lighting given their location at the rear of the rooms, however given the kitchens are not main habitable spaces, this is considered acceptable.

For sunlight within the proposed development, the Report notes that 288 of the 321 windows tested will meet the recommended BRE criteria for annual sunlight and (90) for winter sunlight. The independent report discusses that, where windows are shown to experience transgressions of the BRE criteria, when the sunlight is considered on a room basis, the rooms will achieve good levels of sunlight on the basis that they are largely served by additional windows that exceed the BRE criteria. The windows that would experience minor shortfalls are generally located within elevations oriented just off due east where access to sunlight will be more limited, particularly during the

winter months when the sun's trajectory is low or by close to surrounding obstruction posed by the proposed massing. A significant number also relate to bedrooms, which are considered least important in sunlight terms, and all will nonetheless satisfy or exceed the daylight criteria for the assigned use. Overall, the independent consultant considers daylight and sunlight amenity for the proposed units is acceptable.

AMENITY SPACE

Policy DMHB 18 of the Local Plan: Part Two (2020) requires new developments to provide good quality and usable private outdoor amenity space in accordance with the standards set out in Table 5.3. Based on the schedule of accommodation proposed, the applicant is required to provide 3,670 sq.m of private or communal amenity space for the Guild Living Residences. Where communal amenity space is to be provided on site, it would need to be large enough for the use of all residents and have adequate defensible space where required.

This application proposes to provide 476 sq.m of private amenity space through 32 balconies measuring 5 sq.m and 16 gardens. 2,677 sq.m of communal amenity space is being provided through the magistrates garden situated to the north and the podium garden. Overall, the private and communal amenity space being provided equates to 3,153 sq.m. Whilst there is a shortfall in amenity space, this does not take into account the internal amenity areas. Given the intended use of the development as specialist older persons accommodation the provision of private and communal amenity space and ancillary internal amenity areas is considered acceptable.

It is noted that podium level amenity space is proposed. The depth of any podium, and the required supporting structure, will need to be adequate to support a high quality landscaped environment. If the development is considered acceptable, a condition securing details of the proposed podium level amenity space, including its levels, boundary treatment and a microclimate report is required to demonstrate the podium would provide a good quality level of amenity space to future occupiers.

PUBLIC OPEN SPACE

Policy DMCI 4 of the Local Plan: Part Two (2020) requires major developments to make provision for new open space which meets the needs of the occupiers of the development.

The development would also provide 852 sq.m of public open space at surface level. This is in addition to 100 sq.m of dedicated playspace being provided for the proposed nursery. The open space is proposed to be laid out with hard and soft landscaping and benefits from active surveillance. Overall, the proposed public open space has been well designed and attractively laid out to serve future occupants and visitors to the site.

OVERTSHADING

Both the ground level 'public plaza' and the main communal garden areas for residents have been assessed for overshadowing. The result of the analysis indicates that both of the proposed amenity areas will satisfy the BRE criteria for receiving at least 2 hours of direct sunlight on 21st March.

COMMERCIAL USES

The proposals include a number of commercial operations at ground floor level including a cafe/restaurant and nursery. These uses are supported in principle as they will bring activity into the centre of the site and into the proposed public open space. However there is potential for conflict between the residential uses located above due to the number of comings and goings and noise generation and also potential odour from the restaurant. These amenity issues are not considered to be insurmountable as conditions restricting the hours of operation and details of flue/extraction could be secured to mitigate any potential harm.

Greater harm is likely to arise from the provision of a nursery which could accommodate up to 80 pupils. As set out within the body of this report, the internal access road will be the principal set down point for future users of the nursery and there are only limited spaces available to accommodate the future users. It is therefore essential that the nursery would be required to operate a staggered pick and drop off arrangement to minimise conflict on the internal access road. This adds to the wider concerns regarding the layout of the internal access road not being of a suitable design to accommodate all the proposed uses and users. This will add a further layer of site control and management in order to operate efficiently. So whilst it is considered that a further management plan could be secured for the operation of the nursery, the wider concerns remain in respect of the poorly designed layout and operation of the internal access road and its impact on the adjoining public realm.

Overall, the proposal would provide acceptable living conditions for future residents of the development subject to the imposition of suitable conditions.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy T1 of the London Plan 2021, developments within London should support the Mayor's modal shift targets set out in the London Transport Strategy, with the Mayor setting an overall target of 80% of journeys to be made by walking, cycling and public transport. To support this, outer London is expected to have a sustainable mode share of 75%.

Policy H13 of the London Plan (2021) requires specialist older person housing to ensure pick up and drop off facilities are close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances.

Policy DMT 1 of the Local Plan: Part Two (2020) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 6 of the Local Plan: Part Two (2020) states that development proposals must comply with the relevant parking standards. For a development of this type it is required that the quantum of car parking provided is determined.

The application site is situated on the edge of Uxbridge town centre on the eastern side of the B467 Harefield Road, Harefield forms part of the Boroughs Classified Road Network and is a bus route. In the vicinity of the site, Harefield Road benefits from footways on either side of the carriageway, street lighting and a 30mph speed limit. To the immediate south of the application site is the Hillingdon Metropolitan Police Headquarters, the Police HQ takes access from Warwick Place as do a number of small commercial premises and

the rear service yard of a McDonalds restaurant fronting onto the High Street in Uxbridge town centre.

According to the Transport for London WebCAT service the application site has a PTAL ranking of 5 indicating access to public transport is very good compared to London as a whole suggesting that there are opportunities for some trips to be made to and from the site by modes other than the private car.

The main access into the site would be off Harefield Road in the same location as the existing Wicks and Halfords bell mouth entrance/exit. This access would however be narrowed and converted to one-way working in a clockwise direction. The internal access road would be extended to pass around the rear of the Police HQ where it would then connect to the far end of Warwick Place. The link from the application site to Warwick Place is currently closed to traffic. The site would provide 76 stacker car parking spaces for residents in an undercroft car park and a further 16 on-street spaces along the internal access road. The vehicle entrance to the undercroft parking would be situated just 15 meters back from the B467 Harefield Road. This parking would operate using a valet parking service. The 16 access road on-street spaces would be allocated to valet parking 5 - 2 on the approach 'before' the undercroft entrance, the remainder 'after', minibus parking 1, staff parking 2, shared nursery/valet parking 1 and visitor/carer parking 5 Nurses and carers would be allowed to use the visitor bays but would be required to book ahead to reserve a space. These workers will be prioritised over general visitors to the development. There would also be a layby for pick up and drop off with space to accommodate 2 cars. 20% of all parking would be provided with active electric vehicle charging points with all the remainder having passive provision. The proposal would provide 44 short stay cycle parking spaces and 32 long stay spaces.

In its existing use the site generates an estimated 29 two-way movements in the AM peak 08:00h - 09:00h and 67 two-way movements in the PM Peak 17:00h to 18:00h. This level and profile of activity is considered representative for A1 (non-food) retail uses, in general the number of customers visiting tends to start to build later in the morning. 'With' the development the site would generate 56 two-way movements in the AM Peak and 48 two-way movements in the PM Peak. This modelling shows that in the AM Peak the number of movements generated by the site would increase by 27 and in the PM Peak it would fall by 19. As a proportion of all vehicle movements on the surrounding highway network an increase of 27 movements over one hour is considered insignificant.

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 6: Vehicle Parking requires that development proposals must comply with the relevant parking standards. For a development of this type the maximum number of parking spaces permitted would range between 1 and 1.5 for the 1 and 2 bed units and 2 for the 3 bed units. For the residential part of the development the maximum number of car parking spaces permitted would range between 154 and 294, taking into account that the site has a high PTAL ranking, the maximum number of car parking spaces for the residential part of the development that the Highway Authority would accept would be 154.

The recently adopted London Plan (2021) Policy T6 has introduced new car parking standards. For a development of 194no. units with the bedroom mix described above in an area of PTAL 5 the development should tend towards being car-free - no car parking at all. Where car parking is provided then 20% should be provided with active electric vehicle charging facilities with all the remainder having passive provision.

For the nursery part of the development the Local Plan (2020) requires that the number of car parking spaces to be provided is assessed on an individual basis using a Transport Assessment and Travel Plan. The London Plan 2021 Policy T6 requires that car parking be restricted in line with levels of existing and future public transport accessibility and connectivity tending towards being car-free.

As both the Restaurant and Well Being Centre are an integral and ancillary part of the Residential provision, car and cycle parking for these uses is provided for as part of the residential parking provision.

The proposal would have 76 stacker valet parking spaces in the undercroft and 16 on-street. The Local Plan (2020) would allow a maximum of 154 car parking spaces and the London Plan (2021) would expect the development to be car-free. The 76 stacker valet parking spaces accords with the Local Plan (2020) as it is below the maximum, but it exceeds the requirement of the London Plan (2021). The London Plan (2021) car-free standard is based on a policy of encouraging active travel. Given that the housing would be 'later living' accommodation with care provided as an option the Highway Authority considers the 76 spaces proposed is striking a balance between the Local Plan (2020) and London Plan (2021) standards. 76 units would have access to car parking and 118 units would be car-free. The development would cater for elderly people in need of care, as such they are less likely to be car drivers and car owners in need of somewhere to park. The Highway Authority can accept the number of stacker car parking spaces provided for the residential part of the development.

There are however highway concerns regarding the management of the residents valet car parking and the number and layout of the on-street parking provided for nursery staff, nursery drop off/pick up, visitors, nurses, carers, the minibus, ambulances and cars being transferred to and from the valet parking.

As mentioned above the residents' undercroft parking would operate using a valet parking service. Resident would request that their car is collected from the undercroft, and it would then be parked in one of the 5 valet parking bays for them to collect and then drive away. When they return home, they would again park in one of the valet car parking spaces and leave their car keys with a member of staff who would then arrange for the concierge to park the vehicle in the undercroft. As mentioned above the first 2 of the valet parking spaces would be located between the Harefield Road access and the undercroft entrance with the remaining 3 past the undercroft entrance further into the development. Because there would be one-way system in operation, if the first 2 valet spaces are occupied the resident would have to drive past the undercroft entrance and park in one of the 3 spaces further along the internal access road. Whenever this situation arises, to gain access to the undercroft the concierge would have to loop around the site and join the Harefield Road only to then re-enter to park in the undercroft. This places unnecessary stress on the road network. It also unnecessarily increases the risk of collision between these vehicles and vulnerable road users.

The Highway Authority also has concerns regarding parking provision for the nursery, there would be just 3 pick up and drop off spaces to cater for 80 children and 15 members of staff. When these are occupied, the concierge would direct parents/carers to the 5 visitor parking spaces. As these spaces are situated past the Nursery entrance, some parents/carers may be motivated to stop and park injudiciously holding up the vehicles behind leading to the formation of queues. The Highway Authority notes that picking up and dropping off a young child can be time consuming. The driver needs to get out of the car to

open the door for the child, take them out of a child seat, collect all their belongings leave the car and walk to the Nursery entrance. The parent/carer will then have to responsibly leave the child at the nursery, return to the car and drive away. As the Nursery has places for 80 children, even if arrivals and departures are staggered there will be a lot of activity on this internal access road. Whilst all this Nursery activity is taking place a refuse vehicle or visitor may arrive, at the same time a concierge may be driving a vehicle around the site returning a car to the stacker/valet parking.

The use of the 5 visitor/carer parking spaces would be managed through a booking system, visitors and carers would not therefore have the convenience of 'popping in' to see a relative if they happen to be passing. The site would provide just 1 bay to cater for refuse collections, laundry collections/deliveries and food deliveries etc.

The concerns regarding this proposal stem from the volume of activity taking place along the internal access road - its design and layout is not considered to be able to cope with the demands being placed upon it.

There is a risk that vehicles entering the site may find their route ahead blocked by cars manoeuvring to park, parents/carers dropping off or collecting children as well as refuse and other servicing vehicles.

As mentioned above the internal access road is not wide enough to allow vehicles to overtake and pass, situations could arise where the volume of traffic on-site leads to the formation of queues and injudicious parking compromising the legibility and accessibility of the public realm.

The applicant contends that through careful and 'fine-tuned' management the internal access road and the 16 car parking spaces would be able to operate satisfactorily. In practice the Highway Authority considers that this would not work at all times of the day for the lifetime of the development. Great reliance is placed on visitors (including blue badge holders), carers and nurses booking a car parking space in advance of their arrival. Furthermore, the expedient operation of the on-street car parking is reliant upon some of the car parking spaces serving more than one set of user at different times in response to demand. For example, to cater for peaks in nursery pick up/drop off traffic 2 valet parking spaces, 1 visitor space and the Porte Coche would be brought into use. Similarly, the Porte Cochere would serve many users including nursery pick up/drop off, smaller and short-term deliveries, resident pick up/drop off and ambulances. To ensure the availability of a concierge at all times to carry out the tasks mentioned above there would need to be spare capacity in the number of concierge members of staff working at any one time to cater for peaks in activity and the demand for their services.

For the reasons set out above the Highway Authority would have objections that the proposal would compromise the legibility of the public realm.

Notwithstanding the concerns and objection set out above, were the application to be recommended for approval, the following conditions and Heads of Terms should be secured.

Heads of terms:

1. A Travel Plan should be provided that contains a series of measures to reduce the amount of private car trips the development generates, it should include trip generation and modal spilt target, set out a monitoring regime and outline the measures that would be taken should the target not be attained. As surety that the Travel Plan will be implemented

and targets achieved, the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a s.106 agreement. If the Travel Plan is successful, the bond will be returned.

2. Removal of parking permits for all future businesses and residents

3. The proposal would involve works to the site entrance at the bell mouth junction with Harefield Road. As these changes would involve works upon the Council's highway the Highway Authority would require the developer to enter into a S106 legal agreement obliging the developer to enter into a s.278 with London Borough Hillingdon under Highways Act 1980 thereby allowing such works to be carried out.

4. Car Parking Management Scheme to provide details of parking management controls within the internal access road and within the undercroft car park. This should set out how the Stacker Parking will be maintained for the lifetime of their use.

5. A Healthy Streets contribution for works to along Harefield Road adjacent to the site and along the full length of Warwick Place that encourage and improve the safety and convenience walking and cycling to and from the proposal site.

Conditions:

1. Construction Logistics Plan is required; this is to ensure that construction traffic does not impede the free flow of traffic on the surrounding highway network or present a risk to road safety.

2. Service and Delivery Plan should be submitted for approval, this is key to the safe and efficient operation of the internal access road and parking arrangements

3. All on-street car parking spaces should be provided with active electric vehicle charging points, 20% of all undercroft parking spaces should be provided with active charging points with all the remainder having passive provision.

4. Unrestricted access along the new route from Warwick Place to Harefield Road

7.11 Urban design, access and security

Design has been addressed in paragraph 7.07 of this report.

Security

Policy D11 of the London Plan (2021) requires development proposals to contribute to the minimisation of potential physical risks and include measures to deter crime and anti social behaviour. A secured by design condition has been recommended and therefore the proposal is considered to accord with Policy D11 of the London Plan (2021).

7.12 Disabled access

Policy D3 of the London Plan (2021) seek to ensure that new development achieves the highest standards of accessible and inclusive design. Policy D5 of the London Plan (2021) requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

The Access Officer has considered the application and following a review of amended plans that address the initial comments made, no objections are raised to the amended proposal. The Access Officer notes the Wellness Centre is now located on the ground floor and can be accessed at street level, thus eliminating the need for platform lift access and a dedicated mobility scooter room provides parking for 18 mobility scooters, with a further 2 spaces provided within the cycle store. All of the proposed units are designed to meet M4(2) and M4 (3) standards given the nature of the proposed use. The proposed development accords with policies on inclusive design and accessible housing, subject to

these requirements being secured by condition.

7.13 Provision of affordable & special needs housing

Policy H13 of the London Plan (2021) states that specialist older persons housing should deliver affordable housing in accordance with borough and London Plan policies (Policies H4 and H5), which in the case of Hillingdon would equate to a minimum of 35% of homes to follow the fast-track route.

Policy H5 of the London Plan and Policy DMH7 of the Hillingdon Local Plan: Part Two require a minimum of 35% affordable housing. To follow the fast track route and not be required to submit a financial viability assessment, applicants must meet the following criteria:

- Meet or exceed the relevant threshold level of affordable housing on site (35%) without public subsidy
- Be consistent with the relevant tenure split (70/30 social rent/intermediate).

Policy H2 of the Local Plan: Part One (2012) requires sites with a capacity of 10 or more units, to provide an affordable housing mix to reflect the housing needs in the borough, particularly the need for larger family units.

Policy DMH 7 of the Local Plan: Part Two (2020) requires major residential developments to maximise the delivery of affordable housing on site. A minimum of 35% of all new homes should be delivered as affordable housing with a tenure split of 70% Social/Affordable Rent and 30% Intermediate. This should be of a value equivalent to 35% of the 161 proposed specialist older persons housing.

The applicant is proposing a payment in lieu of £500,000 of affordable housing, this is a reduction of £2.5m which was reduced following amendments to the scheme.

The Applicant notes that rather than on-site delivery due to the complex communal living arrangements which will be provided on site and it being impractical to deliver affordable housing on site. A payment in lieu for a scheme such as this could be considered should exceptional circumstances be demonstrated as outlined in paragraph 4.4.10 of the London Plan (2021). It is accepted that given the complex communal living arrangements, a payment in lieu of affordable housing could on balance, be considered acceptable.

The submitted viability assessment was reviewed by an independent viability consultant appointed by the Council. The independent viability consultant welcomed the inclusion of the event fee valuation by the Applicant. The independent viability consultant advised that the scheme generates a positive land value of £3,078,000 which the applicant disagrees with. Given this position and that both parties are in disagreement about the off-site contribution officers have come to the view that the proposal fails to deliver the maximum reasonable amount of affordable housing and is therefore contrary to adopted planning policies concerning the delivery of affordable housing.

7.14 Trees, landscaping and Ecology

LANDSCAPING

Policy G5 of the London Plan (2021) requires major developments to incorporate high-quality landscaping.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance

amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Local Plan:Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

This site is occupied by two retail units (Wickes and Halfords) at the southern end of Harefield Road, situated to the north of the police station. The existing buildings are set well back from Harefield Road, on elevated land beyond a landscaped car park which serves as a visual filter from the street and residential properties to the north.

There are no TPO or Conservation Area designations directly affecting the site, albeit the existing trees and planting contribute to the character and appearance of the area providing green infrastructure at the interface between the town centre and the residential areas to the north.

The existing site comprises 45 individual trees, 2 tree groups and 1 hedge. 37 trees and the hedge are of a poor quality.

The arboricultural impact assessment (AIA) confirms that most of the 27 trees to be removed to enable the development are 'C' and 'U' grade trees, with just 2 x 'B' category; T26 and T39. A tree protection plan (TPM) and an arboricultural method statement (AMS) are provided. The Trees Officer has raised no objection to the tree strategy subject to the replacement of good quality trees in sustainable tree pits as part of a comprehensive landscape plan.

A Landscape Design and Access Statement has been submitted in support of the application. The main landscape features incorporate a Public Garden Square, a Residents' Roof Garden, Magistrate Court Gardens at ground level, a Wildflower Roof and a Sedum Roof.

Additional tree planting will line the shared pedestrian route through the site and incorporate street tree planting on Harefield Road. An illustrative palette of hard and soft landscape materials is provided, together with illustrations of the various multi-functional character areas. A Preliminary Ecological Appraisal makes recommendations to enhance wildlife and biodiversity that would be incorporated within the landscape details.

The amended plans submitted in March 2021 include key landscape improvements which include the setting back the development from the Harefield Road frontage by a further 2 metres, improving the accessibility and layout of the courtyard area and the provision of a dedicated play area for the nursery.

Cross sections have been submitted to illustrate the site perimeter landscape treatments, including the access road, east boundary and Harefield Road frontage. The amended plans confirm that the access road trees will be supported by structural soil cells providing the required soil volumes to support and sustain healthy tree growth.

The design intention for the Harefield Road frontage incorporates 8 trees and lower-storey ornamental planting. This proposal will make a significant contribution to the character and appearance of the public realm.

The amended proposal provides significant improvements to the landscape layout, however, the success of this scheme will be subject to detailed design, the quality of implementation and establishment, future management and maintenance.

The Trees and Landscaping Officer has raised no objection to the tree strategy or landscaping proposals subject to details which can be secured through conditions.

URBAN GREENING FACTOR

London Plan Policy 5.10 and Policy G5 of the Publication Version of the London Plan (2020) state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

The application proposal has been designed to contribute to green infrastructure and biodiversity. A range of urban greening measures are proposed within the applicant's landscape strategy including lawns, herbaceous and hedge planting areas, trees, a wildflower green roof and a sedum brown roof, with permeable paving areas and landscaping interspersed between car the on-street car parking spaces. The proposal maximises the potential for urban greening, taking into account the site size and the development density constraints. The GLA guidance recommends a target score of 0.4 for residential schemes. The application proposal achieves a score of 0.4 which accords with Policy G5 of the London Plan (2021).

ECOLOGY

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by among other measures, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy DMEI 7 of the Hillingdon Local Plan: Part Two (2020) requires the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site.

The site is considered to be of fairly low quality value and unlikely to be of interest to protected species given the lack of valuable habitat and natural features. A planning conditions requiring ecological enhancements is recommended if the application is considered acceptable.

7.15 Sustainable waste management

Policy EM11 of the Local Plan: Part One (2012) requires all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

The applicant considers that as a commercially operated site, twice weekly collection is appropriate. This is in line with their overarching waste strategy for all the later living sites that they manage and avoids unnecessarily large waste stores being required within their buildings. A suitable commercial waste operator will be employed to collect the waste on this basis.

The units are primarily single occupancy residencies and are specifically designed for over

65s. The volume of waste likely to be generated by these residencies is therefore less than a standard family sized home. The site includes a number of additional services for the elderly residents including a cafe and restaurant where they can eat their meals (reducing their own domestic waste). Waste provision has been provided for both the residencies and the restaurant separately. In addition to the main refuse store, there are two smaller refuse stores adjacent to the cores which are filled up before the waste is transferred to the main waste store by management. The number of bins provided is considered to be acceptable. Where the refuse stores are accessed from outside, double louvred doors are provided to allow the space to be naturally ventilated.

The submitted Servicing and Delivery plan sets out details of the disposal of clinical waste. On the basis of the information provided, the Waste Management Officer has raised no objections to the application subject to conditions securing private waste collection from this development.

7.16 Renewable energy / Sustainability

Policy SI 2 of the London Plan (2021) requires major developments to be net zero-carbon. Major development proposals are expected to include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided that an alternative proposal is identified and delivery is certain.

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The applicant's proposed energy strategy would ensure a 53% reduction in CO₂ emissions over and above baseline Building Regulations requirements on the residential (domestic) element of the scheme, of which, 10% would be achieved through energy efficiency measures. The non-domestic element of the scheme would achieve a 67% reduction in CO₂ emissions over and above baseline Building Regulations, of which, 15% would be achieved through energy efficiency measures. This exceeds the minimum on-site targets for CO₂ emissions and energy efficiency performance which are set out in the London Plan (2021). The applicant's energy strategy comprises a range of passive design and energy efficiency measures, Air Source Heat Pumps and 200 photovoltaic solar panels (PV) at roof level. The remaining shortfall in CO₂ reductions to comply with the zero carbon target is to be secured via a carbon offset payment. Should the application be considered

acceptable, a planning condition and a legal obligation would be secured.

7.17 Flooding or Drainage Issues

Policy SI 13 of the London Plan (2021) requires development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy.

Policy DMEI 10 of the Local Plan: Part Two (2020) applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

The site is located within Flood Zone 1 and generally has a low and very low risk of surface water flooding according to Environment Agency flood risk maps. A range of sustainable urban greening (SuDs) measures are proposed as part of the development including green / brown roofs, soft landscaping and shrub, tree and herbaceous planting areas, permeable paving and below ground storage attenuation tanks to provide the required quantum of surface water run-off storage attenuation capacity (295 cubic metres of attenuation). The outline drainage strategy includes green roof areas, rainwater harvesting, permeable paving and integration with the soft landscaping which should be retained during detailed design.

The Drainage Strategy is considered to be appropriate for this stage of design and acknowledges the information that is required to undertake the detailed design. Most notably, confirmation of the existing and proposed discharge point from the surface water drainage network. It is noted that previous application have sought to discharge into the highway drainage which is not appropriate, however this application assumes that a new connection into the Thames Water surface water sewer in Harefield Road would be required. Should the application be considered acceptable, detailed design of the drainage system should be secured by way of a suitable surface water management condition.

7.18 Noise or Air Quality Issues

Noise

Policy D12 of the London Plan (2021) places the responsibility for mitigating impacts from existing noise generating activities or uses on the proposed new noise-sensitive development.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The nearest noise source is the adjacent Penfield Estate located to the east of the site which comprises light industrial uses that are compatible with existing residential uses. The submitted acoustic report was considered by an independent acoustic consultant who has recommended planning conditions should the application be considered acceptable to protect both the neighbouring Penfield Estate and future occupants of the development.

The proposal includes commercial uses with residential uses above and as such, should the application be considered acceptable, it is recommended that a condition is secured to the operational hours for the commercial uses, including the nursery would be between 07:00 and 22:00 and 09:00 and 18:00 on Sunday and Bank Holidays.

Air Quality

Policy SI 1 of the London Plan (2021) requires development proposals to ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site.

Policy DMEI 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Council's EPU (Air Quality) Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to air quality enhancements.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants

The proposed development is located with the Uxbridge Focus Area, bringing traffic and energy production emissions which will add to current levels of air pollution. The LBH Air Quality Action Plan 2019-2024 has been produced as part of the LA duties to manage local air quality. It includes measures that address the requirement to improve air quality within Focus Areas.

As per definition, Focus Areas are areas where current air pollution levels are unacceptable and current measures are not sufficient to reduce exposure and safeguard public health. Therefore, within Focus Areas, and as per the LBH Local Action Plan, a more stringent application of mitigation is required (measure 5). Given that current levels of emission are unacceptable in Focus Areas, new developments are evaluated by LBH not in relation to the existing use, but in relation to the total level of emissions they originate within the Focus Area so that the suitable level of mitigation required is ascertained.

The operation of the proposed development originates 679 daily LDV trips which is a significant level of traffic circulating in the already congested Uxbridge Focus Area. In addition, the proposed development will include a diesel fuel oil emergency generator, which, as widely known across London Boroughs, can produce significant levels of pollution. The emissions are required to be mitigated. The updated air quality addendum mentions the applicant is considering to apply SRC (Selective Catalytic Converter) to the diesel backup generator with a 75% removal efficiency. Should the application be considered acceptable, this is to be secured via a condition.

Given the sensitive location of the application site in terms of air quality, new developments are expected to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor. The Air Quality Officer has recommended a damage cost of £69,262 to be secured by way of a legal agreement should the development be considered acceptable. In addition, two conditions are required to be secured should the development be considered acceptable to develop and implement a Low Emission Strategy and manage construction emissions as required by the Mayor of London.

7.19 Comments on Public Consultations

Comments received are addressed within the main body of the report.

7.20 Planning obligations

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

Policy DF1 of the London Plan (2021) requires development proposals to provide the infrastructure and meet relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

All but one of these heads of terms have been agreed in principle with the Applicant, however, there is one matter that remains not agreed at the time of writing this report and this relates to the the affordable housing contribution.

Matters Not Agreed :

1. Affordable housing £3,078,000 and an early and late stage review mechanisms in line with Policy H5 of the London Plan (2021).

Matters Agreed

The following Heads of terms have been agreed by all parties:

2. Occupancy restriction to 65+ years requiring a minimum of 2.5 hours of care to secure Use Class C2;
3. To secure all necessary highway works including written agreement from the Local Planning Authority; (Section 278/S38 including works to provide appropriate improvements to kerbs and the adjoining footpath along Harefield Road and landscaping and tree planting as part of the proposals);

4. A car parking management scheme;
5. A full and formal Travel Plan with associated £20,000 bond to include a Sustainable Transport Measures is required to be submitted and agreed in writing by the LPA before occupation of the development. Thereafter, the Travel Plan is required to be reviewed annually to monitor and if required, update and/or amend the document to the satisfaction of the LPA, in order that its aims and objectives are achieved.
6. Parking Permit exclusion clause for all future residents for Uxbridge N Parking Management Zone U1 (other than blue badge holders);
7. Air Quality: in line with the SPD and given the site is located in an air quality management area, a contribution in the sum of £69,262;
8. Carbon Fund: a contribution of £99,473 for a carbon fund to make up for the shortfall for this development and in order to make the development policy compliant (£1800 for every tCO₂/annum that is below the zero carbon target);
9. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances;
10. Delivery and Servicing Plan;
11. Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

Community Infrastructure Levy

The Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 per square metre of gross internal floor area to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable with respect to new floorspace being created. C2 uses attract a nil rate within the the Hillingdon's CIL Charging Schedule.

7.21 Expediency of enforcement action

There is no enforcement history for this site.

7.22 Other Issues

Contaminated Land

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The Contaminated Land Officer has commented on the application noting the information submitted in support of the application confirm the site has a history of contaminative uses, comprising industrial and commercial activities including "an iron works, unspecified depot,

unspecified warehouse, builders' merchant, garage and vehicle repair centre, unspecified tank and electricity substation."

Mapping and tabulated information within environmental search details provided by Groundsure shows records of two tanks; the information suggests one may be situated on site and another off site in vicinity (20m) of the south eastern boundary. Further investigation is therefore required to determine whether or not underground tanks are present at the site.

The site is underlain with superficial strata of the Lynch Hill Gravel Member, designated by the Environment Agency as a Primary Aquifer, which represents controlled waters that are required to be protected accordingly. It is considered the land at the site is suitable for its current use as retail premises. However, the application involves a proposed change of use from commercial (retail) to residential property, the Contaminated Land Officer therefore recommends that a supplementary geo-environmental investigation / risk assessment of the site should be conducted, in order to ensure all areas of land are further characterised and assessed in terms of identified contaminants. The geo-environmental assessment is expected to be structured and targeted in accordance with the proposed future planned designs and layouts for the proposed residential care home,

Having reviewed further information provided by the applicant, the Contaminated Land Officer is satisfied that the details concur with the conditions that is recommended to be imposed. The Officer is also satisfied the proposed course of actions, will be suitable to address the earlier identified objections and thereby ensure the land will be made suitable for the proposed change of use. In order for the Local Planning Authority to be suitably reassured that the proposed work will be conducted and reported in an appropriate manner, it is recommended conditions for land affected by contamination are imposed accordingly.

Fire Safety

Policy D12 (Fire safety) of the London Plan (2021) states that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. A fire statement has been provided which has been undertaken by qualified third party assessor. The report details how appropriate fire safety measures have been incorporated in the proposed design, layout, construction of the development, including means of fire detection and suppression, means of escape and access for emergency services.

Should the application be considered acceptable, a condition is required securing the implementation of a Fire Strategy for all parts of the development in accordance with Policy D12 (Fire safety) of the London Plan (2021).

Overheating Assessment

Policy SI4 the London Plan (2021) requires major development proposals to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

The energy assessment contains information on overheating. Paragraph 5.2.2 presents the summary data regarding compliance. However, the applicant has used the Gatwick

Airport data as opposed to the Heathrow Airport data as a representative data set. The GLA Energy Assessment guidelines states:

The most representative weather data set for the project location should be used, as presented below:

- London Weather Centre data: the Central Activity Zone (CAZ) and other high density urban areas (e.g. Canary Wharf).
- London Heathrow airport data: lower density urban and suburban areas.
- Gatwick Airport data: rural and peri-urban areas around the edge of London.

It is not clear what impacts this would have on the assessment although it is acknowledged that there is limited contingency within the findings and therefore any increase in background temperature baseline may have an adverse impact on the results.

Furthermore, it is noted that whilst the development achieves compliance with the DSY1 requirements (although acknowledging the wrong dataset has been used) the assessment against DSy2 and 3 shows a series of failures. The draft GLA Energy Assessment guidelines state:

It is acknowledged that meeting the CIBSE compliance criteria is challenging for the DSY 2 & 3 weather files, although it is expected that in the majority of cases a significant proportion of spaces will be able to achieve compliance if passive measures are fully exploited. Where the CIBSE compliance criteria is not met for a particular weather file the applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans, and they should commit to providing guidance to residents on reducing the overheating risk in their home in line with the cooling hierarchy.

The overheating assessment shows a significant amount of failures against the DSy2 and 3 datasets (set against Gatwick Airport Data and not Heathrow Airport).

Given the nature of the building and its intended occupancy, there is a particular degree of vulnerability that requires further consideration prior to planning permission being granted. The Applicant has failed to make use of correct Heathrow data. Given the failures against the two additional data years, the Applicant has failed to demonstrate the proposal failed to demonstrate all measures have been taken to reduce the potential for overheating and reliance on air conditioning units contrary to Policy SI 4 of the London Plan (2021).

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

Not applicable.

10. CONCLUSION

The application seeks permission for the comprehensive redevelopment of the site comprising demolition of existing buildings to provide residential care accommodation (Use Class C2), restaurant, cafe and nursery (Use Class E) in buildings up to 7 storeys with car parking, landscaping and associated works. The proposal has been amended during the course of the application in response to statutory and internal consultee comments. The amendments include revisions to the height of the proposed building, incorporating soft

landscaping and inclusive design. The wellness centre and nursery spaces have been reconfigured resulting in the net loss of 12 units across the site.

In land use terms, the loss of existing retail units would not result in harm to the viability and vitality of the town centre. The proposed provision of specialist older persons accommodation would contribute to meeting the annual benchmark of 180 units per annum set by the London Plan (2021).

The applicant has offered a financial contribution for off-site affordable housing of £500,000. The Financial Viability Assessment was reviewed by an independent viability consultant who considers the scheme generates a positive land value of £3,078,000 which the applicant disagrees with. The applicant has therefore failed to demonstrate the proposed contribution offered is the maximum reasonable amount of affordable housing that could be provided by the development.

Internally, the proposed units have been designed to cater for residents requiring care and support. The proposal provides communal facilities, which would be accessible to residents and to the public, including a children's nursery and a wellness centre. Various uses within the development include the wellness centre, library, therapy and treatment rooms, which encourage social interaction. Officers give positive weight to the social and community benefits arising from this scheme.

The layout, scale, height and design of the proposal is unacceptable. The application proposal fails to provide an appropriate transition between the edge of centre setting, and the suburban residential context to the north of the site. Due to the internal road layout and width of the proposed road within the site, together with the distance between the proposed car parking drop off bays and accessible units and the reliance on a concierge managed car parking scheme, the proposal would compromise the legibility of the public realm.

Impact to the level of daylight and sunlight of neighbouring properties has been fully considered following the submission of a daylight and sunlight report, which highlights minimal transgressions is considered acceptable within the context of the site. The protection of neighbouring privacy has sufficiently been mitigated through design and relevant planning conditions. Overall, neighbouring amenity is not considered to be unduly harmed by the development.

The site has a public transport accessibility level (PTAL) of 5, which is considered 'good'. The proposal would not be car-free as on-site accessible parking, mini bus car parking and drop off and pick up bays are to be provided. The quantum of car parking is considered acceptable.

The NPPF (2019) identifies that there are 3 dimensions to sustainable development: social, economic and environmental. The social benefits of the scheme would include the delivery of a mixed use development comprising 182 specialist older persons accommodation, a wellness centre, restaurant/cafe/bar and a children's nursery. The economic benefits of the scheme includes employment during the construction phase and operational development and the ability for the future occupiers to support the local economy by using the amenities in Uxbridge. In terms of the environmental impacts, whilst the development provides public open space and amenity spaces for future residents, the development would also have a significant harmful impact on the streetscene and legibility of the public realm as well as future occupants due to overheating.

Great weight has been attached the delivery of specialist older persons accommodation,

notwithstanding the weight given to all of the benefits arising from the implementation of the delivery of the proposed development, the development also fails to provide a maximum reasonable level of affordable housing, it fails to provide appropriate information on overheating and it fails to provide an appropriately designed scheme.

The harm identified would not be outweighed by the benefits of the scheme and there are no material considerations that indicate a decision should be made other than in accordance with the Development Plan.

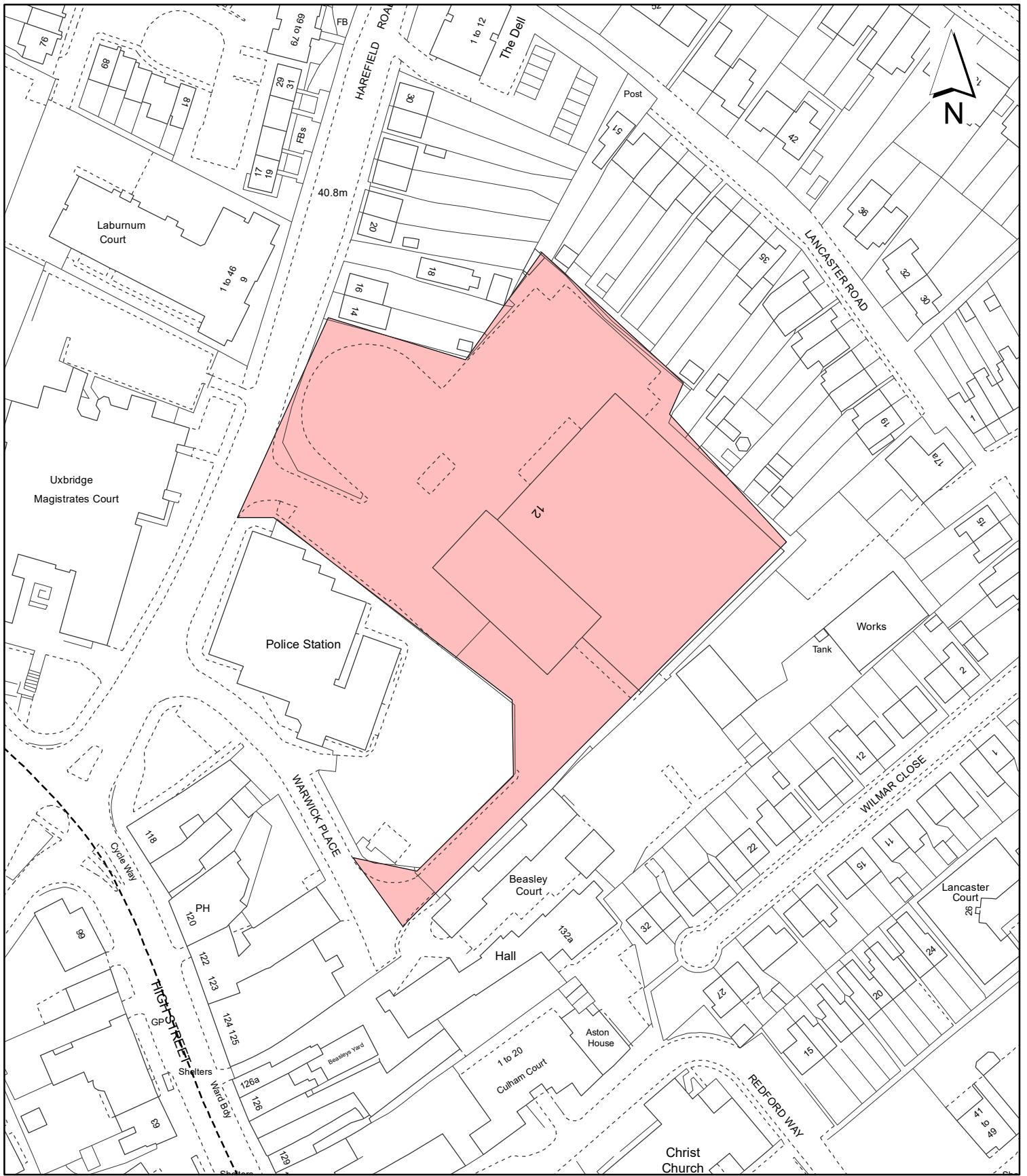
For the reasons set out above, the application is being recommended for refusal.

11. Reference Documents

- Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
- Hillingdon Local Plan: Part 2 Site Allocations and Designations (2020)
- Hillingdon Local Plan: Part 2 Development Management Policies (2020)
- Hillingdon Local Plan: Policies Map (2020)
- London Plan (2021)
- National Planning Policy Framework (2019)
- NPPF Draft text for consultation (2020)
- The Mayor's Housing SPG (2016)
- The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)
- Hillingdon Planning Obligations SPD (2014)
- National Model Design Code (2021)
- National Design Guide Planning practice guidance for beautiful, enduring and successful places (2019)

Contact Officer: Zenab Haji-Ismail

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Notes:

 Site boundary

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LONDON BOROUGH OF HILLINGDON
Residents Services Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
Telephone No.: Uxbridge 01895 250111

Planning Application Ref:

16299/APP/2020/3313

Scale:

1:1,250

Planning Committee:

Major

Date:

April 2021



HILLINGDON
LONDON