

## Report of the Head of Development Management and Building Control

**Address:** CIVIC CENTRE HIGH STREET UXBRIDGE

**Development:** Installation of 2no. Air Source Heat Pumps (ASHPs) on the cooling tower roof, 1no. ASHP on the chimney roof with one thermal buffer, and 4no. ASHPS within the service yard surrounded by a 2.1m high, red metal louvre fencing and one thermal buffer. Replacement of existing timber beams and roof covering of the cooling tower roof. Installation of 9 steel beams to reinforce the existing steel frame in the plant room beneath the roof. On the chimney roof, the paving slabs and stilts will be removed to offset the load of the ASHP and thermal buffer on the supporting roof structure. Installation of secondary glazing and cavity wall insulation.

**LBH Ref Nos:** 14805/APP/2023/3037

**Drawing Nos:** Design and Access Statement

0001 Rev 01

0010 Rev 01

0011 Rev 01

0030 Rev 01

0031 Rev 01

1000 Rev 01

1001 Rev 01

1002 Rev 01

3001 Rev 01

3002 Rev 01

27558-01 P1

27558-02 P1

27558-05 P1

CT/E/72538 (Type 1 to 17)

TER-MA-220

TER-MA-330

Plan

TER-MA-440

Cavity Wall Insulation Install Process

P40220

**Date Plans received:** 18-10-2023

**Date(s) of Amendments(s):**

**Date Application valid** 18-10-2023

**RECOMMENDATION: GRANT Listed Building Consent Subject to conditions**

**1. CONSIDERATIONS**

## 1.1 Site and Locality

The application site comprises the Civic Centre on the High Street, Uxbridge. The building is Grade II listed.

The Civic Centre is sited on an irregularly-shaped corner plot, between the High Street to the approximate north, and the curving dual-carriageway of Hillingdon Road to the east and south. The building is accessed across a large square which opens up from the High Street. The main entrance is to the south of the square. Behind, the council offices have a diamond-shaped footprint and a stepped profile of three and four storeys, set over a semi-basement car park. To the east of the square, connected behind the main entrance, is a second, more irregularly shaped part of the complex. This contains the council chamber, civic suite and registry office, and also has parking beneath.

The application site is not located within a designated Conservation Area, albeit the Old Uxbridge / Windsor Street Conservation Area lies beyond the Civic Centre to the north. The site lies within the designated Town Centre of Uxbridge.

## 1.2 Proposed Scheme

This application seeks listed building consent for:

- i) installation of 2no. Air Source Heat Pumps (ASHPs) on the cooling tower roof;
- ii) Installation of 1no. ASHP on the chimney roof along with one thermal buffer;
- iii) replacement of existing timber beams and roof covering of the cooling tower roof;
- iv) installation of 9 steel beams to reinforce the existing steel frame in the plant room beneath the roof;
- v) secondary glazing; and
- vi) cavity wall insulation.

In addition, on the chimney roof, the paving slabs and stilts will be removed to offset the load of the ASHP and thermal buffer on the supporting roof structure.

This application for Listed Building Consent is accompanied by an application for full planning permission for relevant works which require planning permission (ref.14805/APP/2023/3035). The planning application also considers the proposed siting of air source heat pumps (ASHPs) within the service yard surrounded by 2.1m high red metal louvre fence and one thermal buffer.

## 1.3 Relevant Planning History

14805/APP/2023/3035      CIVIC CENTRE HIGH STREET

Installation of 2no. Air Source Heat Pumps (ASHPs) on the cooling tower roof, 1no. ASHP on the chimney roof with one thermal buffer, and 4no. ASHPs within the service yard surrounded by a 2.1, red metal louvre fencing and one thermal buffer. Replacement of existing timber beams and roof covering of the cooling tower roof. Installation of 9 steel beams to reinforce the existing steel frame in the plant room beneath the roof. On the chimney roof, the paving slabs and stilts will be removed to offset the load of the ASHP and thermal buffer on the supporting roof structure.

**Decision:****Appeal:**

14805/APP/2023/2337      CIVIC CENTRE HIGH STREET

The replacement of a failed flat roof covering (behind parapet walls); replacement of defective pv panels on a like-for-like basis. Joinery, brickwork and concrete repairs; the replacement of single glazed Crittall windows with double glazed Crittall windows. Installation of air source heat pumps to service yard, with associated screening, and removal of a suspended ceiling within the function suite, all within the Middlesex Suite. (Application for Listed Building Consent).

**Decision:** 06-10-23

Approved

**Appeal:**

14805/APP/2023/2336      CIVIC CENTRE HIGH STREET

The replacement of a failed flat roof covering (behind parapet walls); replacement of defective pv panels on a like-for-like basis. Joinery, brickwork and concrete repairs; the replacement of single glazed Crittall windows with double glazed Crittall windows. Installation of air source heat pumps to service yard, with associated screening, and removal of a suspended ceiling within the function suite, all within the Middlesex Suite.

**Decision:** 06-10-23

Approved

**Appeal:****Comment on Planning History**

Relevant history listed above.

**2. Advertisement and Site Notice**

2.1 Advertisement Expiry Date: Not Applicable

2.2 Site Notice Expiry Date: Not Applicable

**3. Comments on Public Consultations****EXTERNAL CONSULTEES**

84 neighbouring properties were consulted by letter dated 23rd of October 2023, which expired on the 13th of November 2023. The site and press notices expire on 29th of November and 26th of November, respectively. No representations have been received to date. Any representations received following the publication of the report will be reported in an addendum.

**INTERNAL CONSULTEES**

The Council's Conservation Officer was consulted on 23rd of October 2023. Their comments are summarised below:

**CONSERVATION OFFICER**

ASHPs

There will be four ASHPs in the service yard, two on the cooling tower flat roof and one on the chimney flat roof of the Civic Centre.

The service yard retains its original utilitarian character and currently has a generator in the vicinity of the proposed location of the ASHPs. The context is therefore already formed by the operational needs of the building and is an appropriate location for the ASHPs and is generally screened from public view, with the exception of the footpath along the wall on the west side and the adjacent tall buildings.

However, the service yard's enclosed character means that cold air generated by the ASHPs necessitates the installation of chimneys up to 5.2 metres in height to remove the cold air away from the area to ensure the ASHPs function effectively. The ASHPs are very large and when combined with the 5.2 metre height the combination will have a clear visual impact from within the yard as well as the limited views from the public sphere. There will be less than substantial harm to the setting of the listed building which will need to be balanced by the public benefits of the proposal in line with NPPF 202. The level of harm is considered to be at the lower end, due to the well screened location, limited visibility from the public sphere and the mitigating impact of moving the bins into the basement car park and the louvred fence around the ASHPs.

The cooling tower is the tallest point of the Civic Centre and is effectively the rectangular flat roof of a plant room with a low surrounding parapet wall. There will be two ASHPs which will be visible in close up views but is partly obscured by the complex surrounding roof profiles, their impact will be reduced by setting them back from the edge and the existing low parapet wall. They will be seen more clearly in longer views from the surrounding area.

In addition to their visual impact, there will be a direct impact on the historic fabric as structural works are necessary to support the ASHPs. The existing timber beams which have rotted will be replaced by nine new steel beams added to the existing steel structure, seven in the plant room below and two on the surface. There will also be an entirely new flat roof system.

There will also be less than substantial harm to the listed building with this aspect of the proposal due to the visibility of the ASHPs in this location and the direct impact on the historic fabric which will also need to be balanced against the public benefits inline with NPPF 202.

The final ASHP will be on the chimney roof at the front of the building. To avoid the structural works necessary on the Cooling Tower roof, in order to lighten the load the paving slabs and stilts will be removed. This will be acceptable but there will be fleeting views of the ASHP from below and in longer views. This has the lowest impact of the proposal for the ASHPs

### Secondary Glazing

The Civic Centre retains its wooden single glazed original windows in the Johnson-Marshall building and Critall windows on the 1930s Middlesex Suite. It is proposed to install secondary glazing into the reveals of all of the windows in the 1970s building and some of the windows in the Middlesex Suite (the rest will have replacement Critall double glazed windows). The windows vary but the majority on the floors above ground level are square with bisecting glazing bars creating four lights. The vertical glazing bars would be carefully aligned with the existing windows and the visual impact is likely to be fairly negligible. The frames will be white to harmonise with the internal decoration rather than the window behind.

The secondary glazing would be reversible and allow the original windows to be preserved. Secondary glazing has the least direct impact on historic fabric and is highly effective in reducing heat

loss. No objection.

#### Cavity wall insulation

This will involve the injection of white wool cavity wall insulation into the mortar joints of the walls at regular intervals. The holes will then be infilled with matching mortar. Provided the mortar matches existing over time, this will have no visible impact on the significance of the listed building.

#### 4. Conclusion

The proposal to introduce secondary glazing and cavity wall insulation is acceptable.

The proposal for the ASHPs involves a degree of harm to the listed building and its setting. The harm is less than substantial and will need to be offset against the public benefits (as required by the NPPF 2021 test) of the scheme to reduce energy consumption and lower the cost and carbon emissions at the Civic Centre.

-If approved a condition requiring the infilled mortar to match existing is suggested

#### PLANNING OFFICER COMMENT

The above mentioned condition has been included within the Officer's recommendation at section 6 of this report.

#### 4. Local Plan Designation and London Plan

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

##### Part 1 Policies:

PT1.HE1 (2012) Heritage

##### Part 2 Policies:

DMHB 1 Heritage Assets

DMHB 2 Listed Buildings

LPP HC1 (2021) Heritage conservation and growth

NPPF16 NPPF 2021 - Conserving & enhancing the historic environment

#### 5. MAIN PLANNING ISSUES

The main considerations are the impact of the proposal on the significance of the Grade II Listed Building, including its fabric and setting.

##### POLICY CONTEXT:

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that: 'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.'

The NPPF at Chapter 16, places great importance on the protection of heritage assets. Of particular relevance to this proposal are the following two paragraphs:

'199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

'202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

Policy HC1 of the London Plan (2021) states, inter alia, that 'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.'

Policy HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape (including locally and statutorily Listed Buildings, Conservation Areas, Areas of Special Local Character and Archaeological Priority Zones and Areas), and encourage the reuse, modification and regeneration of historic assets.

Policy DMHB 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that the Council will expect development proposals to avoid harm to the historic environment and to prevent the loss of significance or harm to the character, appearance and setting of heritage assets.

Policy DMHB 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) will only permit developments that retain the significance and value of Listed Buildings whilst being appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. In addition, any alterations or additions to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

#### ASSESSMENT:

##### Air Source Heat Pumps (ASHPs)

It is proposed to install two Air Source Heat Pumps (ASHPs) on the cooling tower flat roof and one on the chimney flat roof of the Civic Centre.

The cooling tower is the tallest point of the Civic Centre and is effectively the rectangular flat roof of a plant room with a low surrounding parapet wall. As noted by the Council's Conservation Officer, the two ASHPs would be visible in close up views, although would be partly obscured by the complex surrounding roof profiles. Their impact would be reduced by the set back from the roof edge and the existing low parapet wall. They would however be seen more clearly in longer views from the

surrounding area.

In addition to their visual impact, there would be a direct impact on the historic fabric, as structural works would be necessary to support the ASHPs. The existing timber beams have rotted and it is proposed that these are replaced by nine new steel beams being added to the existing steel structure, seven in the plant room below and two on the surface. There would also be an entirely new flat roof system.

It is considered that this aspect of the proposal would result in less than substantial harm to the listed building, as a result of the visibility of the ASHPs in this location and the direct impact on the historic fabric.

The other ASHP is proposed to be installed on the chimney roof at the front of the building. To avoid the structural works necessary on the Cooling Tower roof, the paving slabs and stilts are proposed to be removed. This is considered acceptable, however it is noted that there would be fleeting views of the ASHP from below and in longer views. This element of the scheme is considered to have the lowest impact out of the proposals for the ASHPs.

As noted previously, 4no. ASHPs are also proposed to be installed within the service yard, however those are considered separately in the associated planning application.

### Secondary Glazing

The Civic Centre retains its wooden single glazed original windows in the Johnson-Marshall building and Critall windows on the 1930s Middlesex Suite. It is proposed to install secondary glazing into the reveals of all of the windows in the 1970s building and some of the windows in the Middlesex Suite. The Council's Conservation Officer advises that the windows vary but the majority on the floors above ground level are square with bisecting glazing bars creating four lights. The vertical glazing bars would be carefully aligned with the existing windows and it is considered that the visual impact would likely be fairly negligible. The frames of the secondary glazing are proposed to be white to harmonise with the internal decoration, rather than the window behind.

As noted by the Council's Conservation Officer, the secondary glazing would be reversible and would allow the original windows to be preserved. Secondary glazing also has the least direct impact on historic fabric and is highly effective in reducing heat loss.

### Cavity wall insulation

It is proposed to implement cavity wall insulation by injecting white wool cavity wall insulation into the mortar joints of the walls at regular intervals. The holes would then be infilled with matching mortar. The Council's Conservation Officer has advised that provided the mortar matches the existing over time, the proposal will have no visible impact on the significance of the listed building. A condition to ensure matching mortar has been added to the recommendation at section 6 of this Committee report.

The applicant has worked with Officers (including the Council's Conservation Officer) in order to minimise the impact of the proposals on the building and its setting. It is concluded that the resulting harm would be 'less than substantial' at the lower end of the spectrum, requiring the NPPF paragraph 202 test (detailed above) to be applied. It is considered that there is a clear public benefit in the reduction of energy consumption, the associated reduction in carbon emissions and greater efficiencies in maintaining the public building. It is considered that the clear public benefits outweigh the identified less than substantial harm in this case.

Given the location of the proposed works, it is considered that there would be no harm to the significance of the nearby designated Conservation Area.

Having regard to the above, it is considered that the proposal would have an acceptable impact on the fabric, setting and significance of the Grade II listed building. The less than substantial harm that would arise would be outweighed by the public benefits of the scheme. Consequently, the proposal is considered to accord with Policy HE1 of the Hillingdon Local Plan Part 1 (November 2012), Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan Part Two - Development Management Policies (January 2020), Policy HC1 of the London Plan, and Chapter 16 of the National Planning Policy Framework (2023).

## 6. RECOMMENDATION

**APPROVAL subject to the following:**

1. LB1 Time Limit (3 years) - Listed Building Consent

The works hereby permitted shall be begun before the expiration of three years from the date of this consent.

### REASON

To comply with Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to prevent the accumulation of unimplemented listed building consents and to enable the Local Planning Authority to review the situation at the end of this period if the development has not begun.

2. RES4 Accordance with Approved Plans

The works hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans

0001 Rev 01 Location Plan  
1000 Rev 01 Proposed Site Plan  
1001 Rev 01 Proposed Roof and Ground Plan  
1002 Rev 01 Proposed Roof and Ground Plan  
3001 Rev 01 Proposed Elevations  
3002 Rev 01 Proposed Elevations  
27558-01 P1 Roof Proposed Steelwork West  
27558-02 P1 Roof Proposed Steelwork East  
27558-05 P1 Roof Proposed Steelwork Sections and Details (West Side)  
CT/E/72538 Existing floor plans showing proposed window replacement details  
TER-MA-220 Heat pump  
TER-MA-330 Heat Pump  
TER-MA-440 Heat Pump  
CT/E/72538 Secondary Glazing Treatments Type 1 to 17  
P40220 FLAT ROOF REMEDIAL REFURBISHMENT SPECIFICATION  
Design and Access Statement  
Cavity Wall Insulation Install Process

and shall thereafter be retained/maintained for as long as the works remain in existence.

### REASON



To ensure the works comply with the provisions of the Hillingdon Local Plan Part 1 (2012), Part 2 (2020) and the London Plan (2021).

**3. LB10 Mortar (Listed Buildings)**

The infilled mortar used in the construction of the works hereby permitted shall match the mortar used in the existing building and shall thereafter be retained as such.

**REASON**

To preserve and safeguard the character and appearance of the Listed building in accordance with Hillingdon's Local Plan: Part 1 Policy HE1 (November 2012), Local Plan: Part 2 policies DMHB 1, and 2 (January 2020), the London Plan (2021) and the Planning (Listed Buildings and Conservation Areas) Act 1990.

**4. LB10 Internal and External Finishes (Listed Buildings)**

All new works and works of making good to the retained fabric of the building, whether internal or external, shall be finished to match the existing fabric with regard to methods used and to material, colour, texture and profile.

**REASON**

To preserve and safeguard the character and appearance of the Listed building in accordance with Hillingdon's Local Plan: Part 1 Policy HE1 (November 2012), Local Plan: Part 2 policies DMHB 1, and 2 (January 2020), the London Plan (2021) and the Planning (Listed Buildings and Conservation Areas) Act 1990.

**5. LB2 Making good of any damage**

During works the existing building including fixtures, fittings and features would need to be appropriately safeguarded. Any damage or disturbance caused to the building in execution of the works shall be made good to the satisfaction of the Local Planning Authority within six months of the works being completed.

**REASON**

To safeguard the special architectural and/or historic interest of the building in accordance with Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

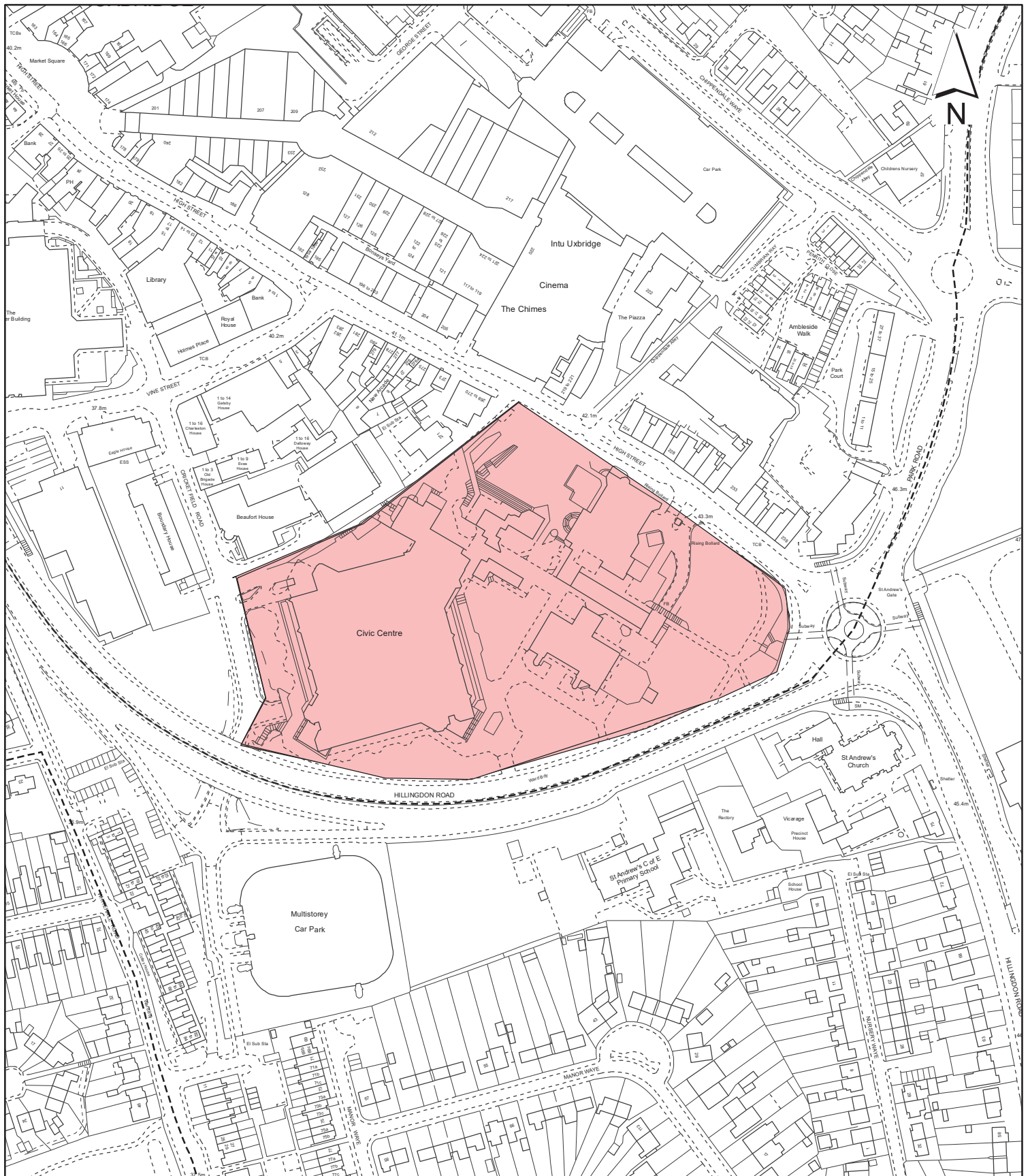
**INFORMATIVES**

1. The decision to GRANT Listed Building Consent 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. You are advised this permission is based on the dimensions provided on the approved drawings as numbered above. The development hereby approved must be constructed precisely in accordance with the approved drawings. Any deviation from these drawings requires the written consent of the Local Planning Authority.

**153** The decision to GRANT Listed Building Consent 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.

DMHB 1	Heritage Assets
DMHB 2	Listed Buildings
LPP HC1	(2021) Heritage conservation and growth
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment

<b>Contact Officer:</b>	Emilie Bateman	<b>Telephone No:</b>	01895 250230
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**Notes:**

 Site boundary

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Site Address:

**Civic Centre**

Planning Application Ref:

**14805/APP/2023/3037**

Planning Committee:

**Minors**

Scale:

**1:2,500**

Date:

**December 2023**

**LONDON BOROUGH  
 OF HILLINGDON**  
 Residents Services  
 Planning Section

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



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