

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

Case Officer: **Alan Corcoran**

**78696/APP/2024/867**

Date Application Valid:	<b>02.05.2024</b>	Statutory / Agreed Determination Deadline:	<b>30.05.2025</b>
Application Type:	<b>Full</b>	Ward:	<b>Uxbridge</b>

Applicant: **DNA Uxbridge Ltd**

Site Address: **148 – 154 High Street, Uxbridge**

Proposal: **Demolition of existing buildings and construction of a mixed-use development comprising a hotel (Use Class C1), residential co-living accommodation (Use Class Sui Generis), and commercial floorspace (Use Class E) and ancillary work, including public realm improvements, a new pocket park, basement parking, and associated infrastructure.**

Summary of Recommendation: **GRANT planning permission subject to section 106 legal agreement and conditions**

Reason Reported to Committee: **Required under Part 1 of the Planning Scheme of Delegation (Major application recommended for approval)**



## **Summary of Recommendation:**

GRANT planning permission subject to the completion of a satisfactory section 106 legal agreement to secure the heads of terms set out below, and subject to the conditions as set out in Appendix 1.

### Section 106 Legal Agreement Heads of Terms:

It is recommended that delegated powers be given to the Director of Planning and Sustainable Growth to grant planning permission subject to the following:

1. That the application be referred back to the Greater London Authority.
2. That should the Mayor not issue a direction under Article 7 of the Order that he is to act as the Local Planning Authority for the purposes of determining the application, delegated powers be given to the Director of Planning and Sustainable Growth to approve this application subject to:
  - A) That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:
    1. In lieu affordable housing contribution of £3,618,409. The S106 agreement shall include an Early and Late-Stage Viability Review mechanism.
    2. Air Quality Mitigation contribution of £88,533.
    3. A Carbon Offset contribution of £276,260.
    4. London Healthy Urban Development Unit (HUDU) financial contribution of £414,307 to fund enhanced or new health facilities within the London Borough of Hillingdon.
    5. An Employment/Construction Training Scheme secured in accordance with the Council's Planning Obligations SPD.
    6. Residential Parking Permits restriction (excluding Blue Badge holders).
    7. A Healthy Streets/Active Travel Zone contribution of £61,996 within the London Borough of Hillingdon.
    8. A £4,500 contribution towards implementing traffic orders within the London Borough of Hillingdon.
    9. A £105,000 contribution to Transport for London (TfL) towards measures to improve the bus infrastructure and waiting environment within the London Borough of Hillingdon.
    10. A Section 278 Agreement to implement the proposed off-site Highways Works, including (but not limited to) York Stone paving and installation of street trees, on Bakers Road, Belmont Road, High Street (the full width of the pedestrianised area of the High Street between Belmont Road and Cocks Yard but excluding the existing tegula block paving), and Cocks Yard.
    11. A Section 38 Agreement to transfer land in front of the building line on Belmont Road (not under colonnade) and Bakers Road to Hillingdon Council.
    12. Public Square to remain publicly accessible in perpetuity.

13. 'Be Seen' post-construction energy monitoring to be carried out in accordance with the GLA 'Be Seen' Energy Monitoring Guidance London Plan Guidance Documents (2021).

14. A replacement delivery loading bay within Bakers Road shall be agreed with the Council in consultation with Transport for London and implemented by the developer on Bakers Road prior to the removal of the existing Bakers Road delivery loading bay.

15. A Section 247 stopping up order agreement for the developer to take ownership and ongoing maintenance of the public access through Cocks Yard, to secure continued public access between Bakers Road and the High Street and associated management and maintenance.

16. A town centre public car park season ticket restriction.

17. A Project Management and Monitoring Fee, equalling 5% of the total financial contributions to be paid under this agreement.

B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

C) That officers be authorised to negotiate and agree the detailed wording of the heads of terms, the proposed Legal Agreement and conditions of approval.

D) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Director of Planning and Sustainable Growth), delegated authority be given to the Director of Planning and Sustainable Growth to refuse planning permission for the following reason:

*'The applicant has failed to mitigate the impacts posed by the proposed development (in respect of affordable housing, air quality, carbon offsetting, health, employment/construction training, Highways safety, sustainable travel, public access, energy monitoring, parking restrictions and public access). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 56-58 of the National Planning Policy Framework (2024).'*

E) That if the application is approved, that the permission is subject to the Conditions as set out in Appendix 1.

## **1 Executive Summary**

1.1 The Site is within the Uxbridge Metropolitan Town Centre, Primary Shopping Area (Uxbridge), and Office and Hotel Growth Location (Uxbridge Town Centre) designations. Policy SA 26 of Hillingdon Local Plan: Part 2 - Site Allocations and Designations (2020) also designates the Site for 'New Homes', stating 'The site is considered suitable for residential-led mixed-use development.'

1.2 The proposal consists of the demolition of the existing three-storey development that contains 1,524 sq. m. of office floor space (Use Class E), 3,582 sq. m. of retail

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accommodation (Use Class E), 258 sq. m. of residential use (Use Class C3), and 130 basement car parking spaces. Following demolition, the Applicant proposes the construction of a mixed-use development comprising 320 co-living units (Use Class Sui Generis), 162-bedroom hotel (Use Class C1), and 1,115 sq. m. ground floor commercial floorspace (Use Class E) and ancillary work, including public realm improvements, a new pocket park, basement parking, and associated infrastructure. The development would be approximately 21,000 sq. m. and would range in height from eight to ten storeys.

- 1.3 The principle of development is supported. The building's height, scale, and mass are appropriate for its town centre location at a highly accessible (Public Transport Accessibility Level – PTAL – 6a) public transport interchange. The Council has worked with the Applicant to refine the development's design during pre-application and the full planning application process, securing floor plan and site/landscape amendments, high-quality external materials, and architectural detailing. The proposed development would cause less than substantial harm to the neighbouring Conservation Area and nearby Listed Buildings, but the public benefits of the proposed scheme would outweigh this. The quality of co-living accommodation complies with The London Plan and London Plan Guidance. Whilst the proposal would have some impact upon neighbouring amenity, on balance, the identified overshadowing impact would not be so significant as to justify a refusal of planning permission. The Council's Highways Team, the Greater London Authority, and Transport for London support the car-free (except for nine disabled person parking spaces in the basement) nature of the proposed development and raise no highways objections, subject to the recommended conditions and legal agreement heads of terms, which are included in this recommendation.
- 1.4 One comment of support, nine objections, and three neutral comments have been received from members of the public. These are duly addressed in this assessment.
- 1.5 The proposal has been assessed in accordance with the development plan, whilst it is noted that there are some shortfalls in compliance this is not unusual for a major scale development. The proposal would result in some harm however Officers consider the harm to be limited. Paragraph 11 of the NPPF 2025 recognises the challenges developments will have in achieving compliance with the development plan in its entirety and encourages a balanced approach to be taken to weighing the benefits of the proposal against the harm identified. In this case the proposal would bring forward the regeneration of a corner of the high street, further enhancing the vitality of this area and the Town Centre as whole. This would result in employment retention, the optimisation of a brownfield site to provide a contribution towards local housing stock, an affordable housing contribution and the delivery of a new public square. All of these benefits are considered to outweigh the limited harm identified by Officers and as such the proposal would accord with paragraph 11 of the NPPF.

On balance, the proposal is acceptable and would be consistent with the overarching aims of the National Planning Policy Framework, The London Plan, and Hillingdon Local Plan.

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1.6 The planning application is therefore recommended for approval, subject to the conditions contained in Appendix 1, the Section 106 Heads of Terms detailed above, and Stage II referral to the Greater London Authority.

## **2 The Site and Locality**

2.1 The 0.38-hectare application Site (148-154 High Street) is located on a prominent plot fronting a pedestrianised section of Uxbridge High Street to the west, Belmont Road to the north, Bakers Road to the east, and Cocks Yard (a pedestrian route connecting Bakers Road and High Street) to the south.

2.2 The existing three-storey building comprises approximately 1,524 sq. m. of office floor space and 3,582 sq. m. of retail accommodation (Use Class E). Retail units include Greggs, WH Smith, Post Office, Oxfam, Card Factory, and The Carpet Centre. It also contains 258 sq. m. of residential use (Use Class C3). A service yard occupies the centre of the Site, with access to a public basement car park available from Baker's Road, comprising 130 parking spaces.

2.3 The Site is within the Uxbridge Metropolitan Town Centre, Primary Shopping Area (Uxbridge), and Office and Hotel Growth Location (Uxbridge Town Centre) designations. Policy SA 26 of Hillingdon Local Plan: Part 2 - Site Allocations and Designations (2020) also designates the Site for 'New Homes', stating 'The site is considered suitable for residential-led mixed-use development.'

2.4 The Site is within an Air Quality Management Area and an Air Quality Focus Area. It is also within the wider Uxbridge Archaeological Priority Area (APA) and Potentially Contaminated Land area. It is in Flood Zone 1 (lowest flood risk) and is not within a Critical Drainage Area. Surface Water Flooding impacts a small (approximately 170 sq. m.) area towards the centre of the Site.

2.5 There are no listed buildings on the Site, and it is not within a Conservation Area or Area of Special Local Character (ASLC). Notwithstanding, the Site is within the wider Uxbridge Archaeological Priority Area (APA) and between a two-part Conservation Area (Old Uxbridge/Windsor Street). The Conservation Area is approximately 13 metres to the north and south of the Site. There are several Listed Buildings within the Conservation Area, and three War Memorials are located within 75 metres of the Site. North Uxbridge ASLC is approximately 130 metres north of the Site.

2.6 The Site has a Public Transport Accessibility Level (PTAL) of 6a, where a score of 0 indicates very poor access to public transport and 6 indicates excellent access. Notably, Uxbridge London Underground station is approximately 50 metres southeast of the Site, and commuters can access it from Bakers Road. It provides access to the Metropolitan and Piccadilly lines. Additionally, there are several bus stops on Belmont Road and Bakers Road.

2.7 The Pavilions, on the opposite side of the High Street to the west, contains residential units above retail. This building is up to eight storeys in height. To the east, on the opposite side of Bakers Road, are several large properties comprising residential, office, and hotel uses. These buildings vary between five and nine

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storeys in height. To the north, on the opposite side of Belmont Road, is a two to three-storey terrace used as a bank and a restaurant. To the south is 155-162 High Street, a three-storey block containing several large retail units and a fast-food restaurant. Beyond that is Market Square and Uxbridge Underground Station.

**Figure 1: Location Plan (application site edged red)**



**Figure 2: Aerial View of the Application Site**



**Figure 3: Street View Images of the Application Property**



**Junction of Bakers Road and Belmont Road**



*Bakers Road*



*Belmont Road*

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*High Street*



*Cocks Yard (a pedestrian route connecting Bakers Road and High Street)*

**3 Proposal**  
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- 3.1 The proposal consists of the demolition of the existing buildings and construction of a mixed-use development comprising a hotel (Use Class C1), residential co-living accommodation (Sui Generis), and commercial floorspace (Use Class E) and ancillary work, including public realm improvements, a new pocket park, basement parking, and associated infrastructure.
- 3.2 The development would range in height from eight to ten storeys, over basement and have a gross internal floor area of approximately 21,000 sq. m.
- 3.3 The proposed development would create a new public open space measuring approximately 2,070 sq. m. located at the site's centre. It would deliver new and improved pedestrian links between the surrounding streets and provide additional publicly accessible planting, seating, and outdoor amenity space.
- 3.4 The proposed co-living development would deliver 320 new homes (Use Class Sui Generis), provided as private studios measuring between 19 and 24 sq. m. and private wheelchair-accessible studios measuring between 31 and 36 sq. m. Ten percent of the proposed homes (32 units) would be wheelchair-accessible.
- 3.5 The Applicant proposes a living-kitchen-diner communal space in the northeast corner of each floor of the co-living development that has accommodation. The provision equates to 0.8 sq. m. of kitchen space per resident and four dining spaces per cooking station. Further, internal co-living amenity space would be provided on the ground floor at the junction of Belmont Road and Bakers Road. Other ancillary co-living amenity spaces, including a gym, cinema room, and co-working spaces are proposed in the basement. The proposed development would deliver an average amenity provision of 4.1 sq. m. per resident. External amenity space is proposed on the roof fronting Belmont Road, providing an additional two sq. m. of external amenity space per resident. The main entrance into the co-living development would be at the corner of Belmont Road and Bakers Road.
- 3.6 The proposed hotel (Use Class C1) would comprise 162 hotel bedrooms. It would also include an ancillary office, kitchen, bar, storage areas, and an external terrace for guests to use. The hotel would be accessed from the corner of Belmont Road and High Street via an access-controlled doorway with lifts and stair leading to the eight-floor hotel reception area.
- 3.7 The proposed development would also provide 1,115 sq. m. of commercial floorspace (Use Class E) along the ground floor of High Street and Belmont Road. It would have a double-height frontage and incorporate a mezzanine level.
- 3.8 The building's external material would consist mainly of brick. The Bakers Road block would be finished in a brown clay brick (by European Building Materials – Purple Ash variant). The ground and first floor of the Bakers Road block would be finished in a white brick (by Wienerberger – Thorne White variant). The eighth floor set-back of the Bakers Road block would be finished in Standing Seam Zinc Cladding (by VMZinc – Storm Grey variant). The Belmont Road block would be a red clay brick (by Vandersanden – Azalea variant). The hotel would be finished in textured and smooth GRC composite cladding (by Rieder – cotton matt variant and

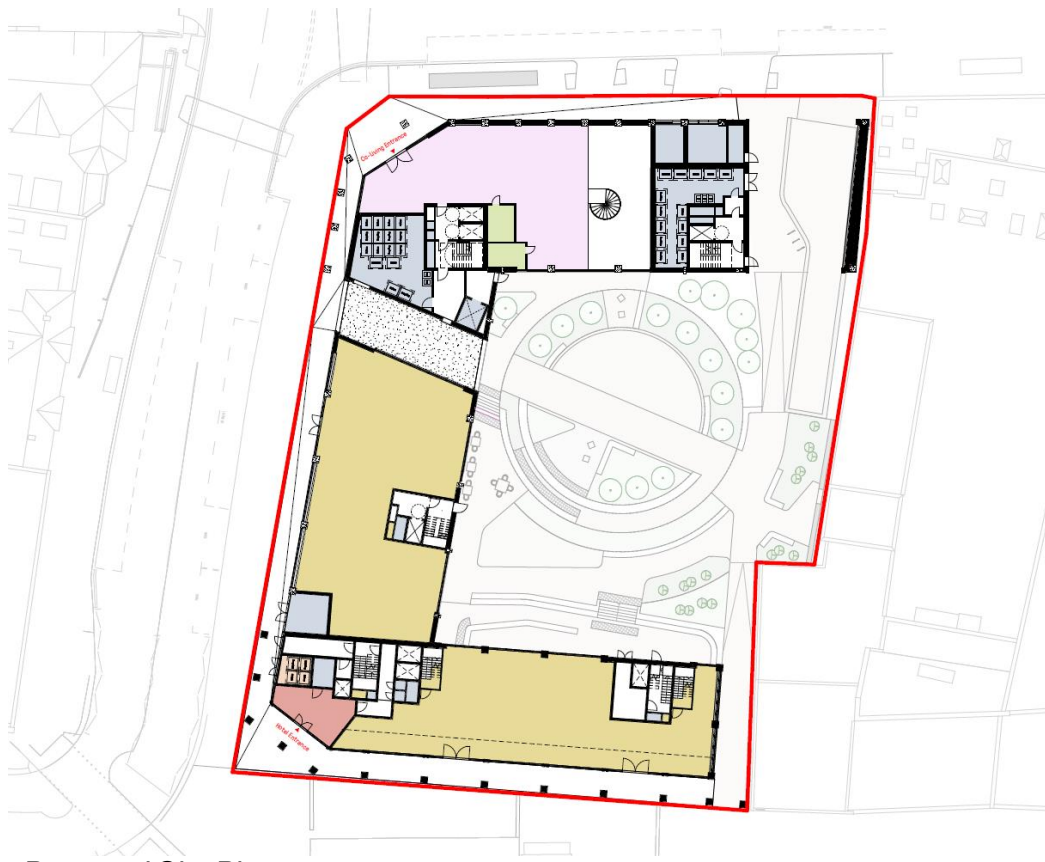
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cotton ferro variant). Lastly, the pedestrian passageways would be clad in white tiles (by Ibstock – White WT-10 variant).

- 3.9 Vehicular access on Bakers Road to basement parking would be retained, though it would be redesigned and repositioned. The basement car park would have nine disabled person car parking spaces (four for the co-living use and five for the hotel use). There would also be 263 long-stay cycle parking spaces in the basement. Twenty-four additional short-stay cycle parking spaces would be publicly accessible at ground level on High Street, Belmont Road, and Cocks Yard.

**Figure 4: Proposed Plan** (please note – larger version of plan can be found in the Committee Plan Pack)



*Proposed Site Plan*



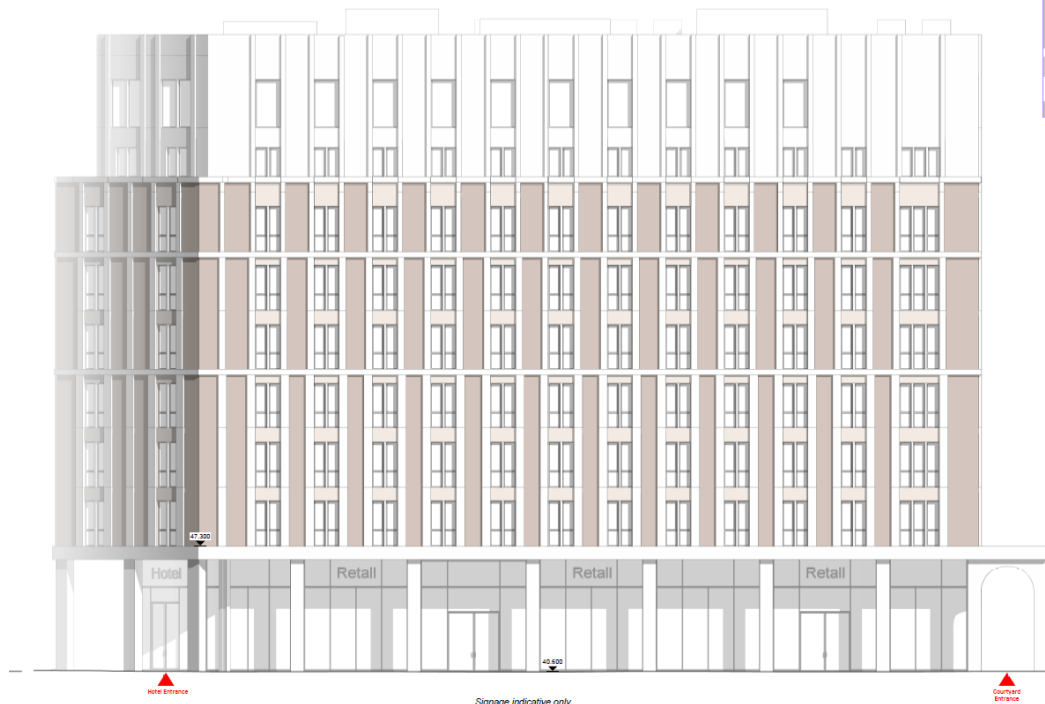
*Proposed Co-Living - Bakers Road Elevation*



*Proposed Co-Living and Retail – Belmont Road Elevation*

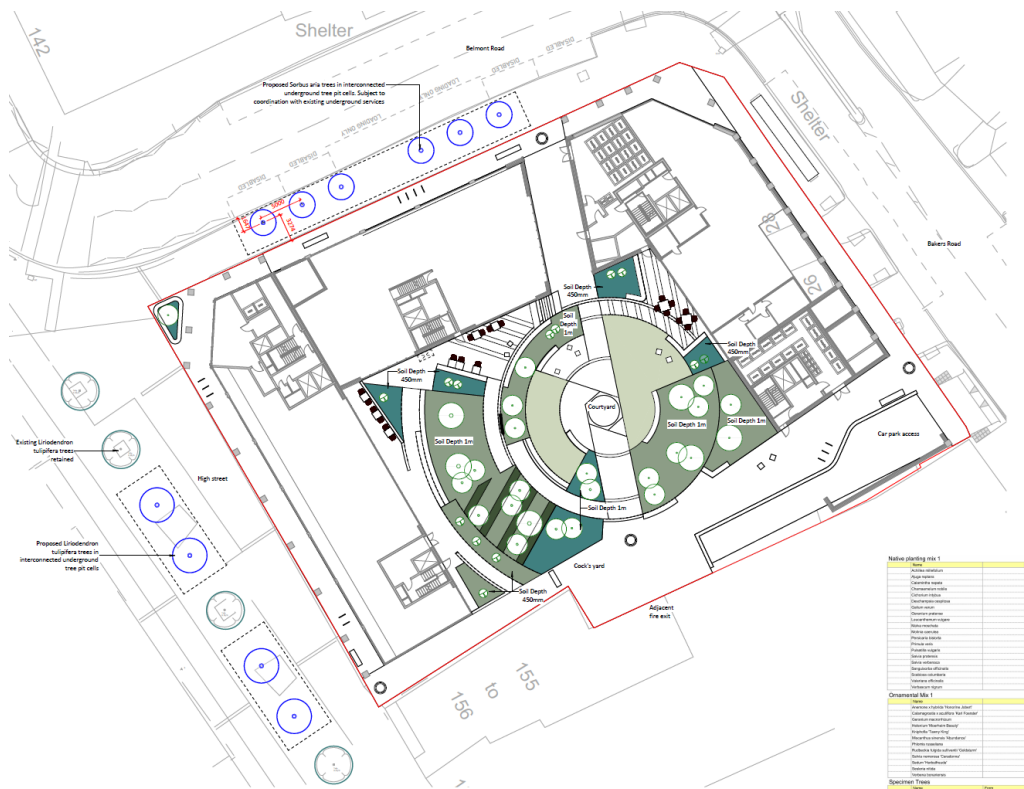
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2 Hotel Elevation - High Street  
1:100

**Proposed Hotel and Retail – High Street Elevation**



**Proposed Planting Strategy**



*View of Proposed Development from Belmont Road towards High Street*

#### **4 Relevant Planning History**

- 4.1 A list of the relevant planning history related to the property can be found in Appendix 2.

#### **5 Planning Policy**

- 5.1 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

#### **6 Consultations and Representations**

- 6.1 The Council sent consultation letters to 1,558 local residents, as well as The Mall Pavilions Shopping Centre on 13-05-24. The Council also advertised the application with a site notice and press notice on 22-05-24. The initial consultation expired on 13-06-24.
- 6.2 The Council carried out a 21-day re-consultation on 12-02-25, which expired on 05-03-25.
- 6.3 Representations received in response to public consultation are summarised in Table 1 (below). Consultee responses received are summarised in Table 2 (below). Full copies of the responses have also separately been made available to Members.

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**Table 1: Summary of Representations Received**

<b>Representations</b>	<b>Summary of Issues Raised</b>	<b>Planning Officer Response</b>
One individual letter of support has been received.	(1) Supports the proposal.	Noted.
Three individual neutral letters have been received.	(1) Not opposed to the proposed development but raised a concern regarding lack of proposed car parking and new co-living residents applying for resident's parking permits.	Discussed at paragraph 7.85 of this report.
	(2) Concerns regarding loss of retail; construction disruption; inadequate co-living amenity spaces; cramped living space; querying co-living resident conflict management; querying courtyard and passageway management and maintenance; querying cycle prevention onsite; and querying if public toilets could be added.	Discussed at paragraph 7.11-7.19, 7.100, 7.72-7.80, and 7.120-7.126 of this report. Public toilets do not form part of the submitted application.
	(3) Neutral comments accepting the need to develop the site but raise concerns regarding noise and parking.	Discussed at paragraph 7.81-7.91 and 7.98-7.101 of this report.
Nine individual letters of objection have been received	(1) Noise pollution and unnecessary disruption.	Discussed at paragraph 7.98-7.101 of this report.
	(2) Not enough information about the mixed communal space and the co-living accommodation.	Discussed at paragraph 7.72-7.80 of this report.
	(3) Loss of light and privacy.	Discussed at paragraph 7.67-7.71 of this report.

	(4) The proposed building would be too tall and over dominant.	Discussed at paragraph 7.41-7.45 of this report.
	(5) The proposal would further overcrowd the town centre; the proposed building would be too tall; overshadowing.	Discussed at paragraph 7.41-7.45, 7.61-7.65, and 7.67-7.71 of this report.
	(6) Construction noise and disruption.	Discussed at paragraph 7.100 of this report.
	(7) Development scale would be out of character and building is unattractive.	Discussed at paragraph 7.41-7.45 of this report.
	(8) Too tall and large; heritage impacts; increased vehicle traffic; overpopulation and pressure on healthcare, education, and waste management; and environmental concerns, namely, carbon emissions, noise, and air quality; opposes demolition of existing retail building; potential for vacancies; lack of planting; flood risk; and loss of biodiversity.	Discussed at paragraphs 7.41-7.45, 7.46-7.60, 7.61-7.65, 7.81-7.91, 7.98-7.101, 7.104-7.106, 7.120-7.126, 7.135-7.138, 7.139-7.143, 7.146-7.151, 7.156-7.159 of this report.
	(9) Loss of on-street disabled person car parking bays; reduced public car parking facilities; the proposed building would be incongruous and too tall.	Discussed at paragraph 7.41-7.45 and 7.81-7.91 of this report.

**Table 2: Summary of Consultee Responses**

<b>Consultee and Summary of Comments</b>	<b>Planning Officer Response</b>
<b>External Consultee Comments</b>	
<b>Greater London Authority:</b>  Recommended conditions regarding the management and maintenance of the public realm, materials, landscaping, free drinking water, district heating network connection, Whole Life-Cycle Carbon Assessment, Circular Economy Statement, and	The Applicant has submitted additional information following the GLA's Stage 1 comments.

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<p>Urban Greening Factor. Recommended 'Be Seen' energy monitoring S106 obligation.</p> <p>Stage II referral to the GLA is required if approved at Planning Committee.</p> <p><u>Land Use Principles</u>: Supported in strategic planning terms, subject to further information being submitted to demonstrate compliance with London Plan Policy H16.</p> <p><u>Affordable Housing</u>: The affordable housing in lieu payment of £3,618,409 likely represents the maximum viable amount in this particular case.</p> <p><u>Urban Design</u>: Broadly supported, though some clarifications and amendments are requested in relation to public realm, internal quality, fire safety, and inclusive design. Conditions and obligations are also recommended.</p> <p><u>Heritage</u>: Further information is required to enable GLA officers to assess the proposals' impacts.</p> <p><u>Transport</u>: The applicant is encouraged to explore further improvements to the pedestrian and cycling environment and contributions should be secured. Concerns around impacts on bus operations must be addressed. Other clarifications are requested and conditions and obligations are recommended.</p> <p><u>Environment</u>: Further information needed in relation to energy, whole life-cycle carbon, circular economy, urban greening and air quality. Conditions and obligations are also recommended.</p>	<p>Conditions have been recommended in line with GLA recommendations. Officers consider that the matters raised in the GLA's Stage I comments have been addressed. The Local Planning Authority will refer the application back to the GLA for Stage II (as required) if the Planning Committee resolves to grant planning permission.</p>
<p><b>Transport for London:</b></p> <p>No objection subject to a £105,000 contribution to Transport for London towards implementing measures to improve the bus infrastructure and waiting environment secured by a Section 106 and planning conditions regarding a Delivery and Servicing Plan, Construction Logistics Plan, and Travel Plan.</p>	<p>A S106 financial contribution is included in the recommended Heads of Terms. Conditions have been recommended in line with TfL recommendations.</p>
<p><b>Greater London Archaeological Advisory Service:</b></p> <p>No objection.</p>	<p>Noted.</p>
<p><b>Historic England</b></p>	

No objection raised.	Noted.
<p><b>National Health Service</b></p> <p>No objection subject to a London Healthy Urban Development Unit (HUDU) financial contribution of £414,307 to fund enhanced or new health facilities within the London Borough of Hillingdon secured by a S106 Agreement.</p>	A S106 financial contribution is included in the recommended Heads of Terms.
<p><b>London Fire Brigade:</b></p> <p>No objection. Further details required at the building regulations consultation stage.</p>	Noted.
<p><b>Metropolitan Police Design Out Crime:</b></p> <p>No objection subject to a condition regarding 'Secured by Design' accreditation.</p>	Conditions have been recommended in line with the Metropolitan Police's recommendations.
<p><b>Protective Security Operations (Metropolitan Police):</b></p> <p>No objection raised. Recommendations regarding Counter Terrorism Risk Assessment and Operational Requirement including access control system, detection, and verification, Vehicle Dynamics Assessment and hostile vehicle mitigation measures, laminate glazing, dynamic lockdown system, and post and delivery design.</p>	Conditions have been recommended in line with the Metropolitan Police's recommendations.
<p><b>Thames Water Utilities:</b></p> <p>No objection.</p>	Noted.
<p><b>National Air Traffic Services:</b></p> <p>No objection.</p>	Noted.
<p><b>Ministry of Defence:</b></p> <p>No objection subject to conditions regarding a Construction Management Plan and Bird Hazard Management Plan.</p>	Conditions have been recommended in line with Ministry of Defence recommendations.

<p><b>Health and Safety Executive:</b></p> <p>No objection.</p>	<p>Noted.</p>
<p><b>Internal Consultee Comments</b></p>	
<p><b>Viability Consultant (BNP Paribas):</b></p> <p>No objection raised. Recommendation of in lieu affordable housing contribution of £3,618,409 with early and late-stage viability review mechanism secured by S106 legal agreement.</p>	<p>A S106 financial contribution is included in the recommended Heads of Terms.</p>
<p><b>Daylight/Sunlight Consultant (ULS):</b></p> <p>No objection raised. Planning policy and guidance support the optimisation of underutilised, highly sustainable, accessible sites. In this context, it is necessary to ensure that development is high-quality and delivers benefits for both new and existing communities when assessing daylight, sunlight, and overshadowing matters. Planning decision makers should apply default daylight and sunlight standards sensitively and flexibly so not to prevent appropriate development coming forward on the right sites.</p>	<p>Noted.</p>
<p><b>Urban Design Officer:</b></p> <p>No objection. Condition recommended regarding GRC cladding.</p>	<p>Conditions have been recommended in line with the Urban Design Officer's recommendations.</p>
<p><b>Landscape Officer:</b></p> <p>Some concerns raised regarding the amount of shrub planting introduced in the public square and subsequent reduction in useable area, visibility and reduction in natural surveillance. Preference for fewer trees to be planted but of a larger species. Noted that these requests conflict with the requirement to achieve appropriate level of Urban Greening Factor.</p> <p>Request for details of materials proposed for the seating areas and proposed soil depths for planting, agreement to proposed use of York Stone as a hard surfacing material. No objection to details of the</p>	<p>Unfortunately, due to the change in levels, the need to retain the basement and location of utilities, larger tree planting can't be accommodated. Noted that larger trees may also reduce natural surveillance. Conflict</p>

streetscape along Belmont Road and Bakers Road, nor to the proposed roof terrace landscaping.	with UGF noted. Details of soil depth and seating materials to be secured by condition. Discussed at paragraph 7.120-7.126 of this report.
<b>Heritage Officer:</b>  No objection.	Noted.
<b>Economic Development:</b>  No objection subject to an Employment/Construction Training Scheme secured in accordance with the Council's Planning Obligations SPD via a S106 Agreement.	This request is a recommended Heads of Terms to be secured in the S106 Agreement.
<b>Accessibility Officer:</b>  No objection subject to a condition regarding wheelchair-accessible hotel rooms.	Conditions have been recommended in line with the Accessibility Officer's recommendations.
<b>Refuse Recycling Officer:</b>  No objection.	Noted.
<b>Planning Policy Officer:</b>  No objection.	Noted.
<b>Highways Officer:</b>  No objection subject to Section 106 Agreement requiring residential parking permits restriction (excluding Blue Badge holders), a Healthy Streets/Active Travel Zone contribution of £61,996, a £4,500 contribution towards implementing traffic orders; a Section 278 Agreement to implement the proposed off-site Highways Works, including York Stone paving and installation of street trees, on Bakers Road, Belmont Road, High Street, and Cocks Yard; a Section 38 Agreement to transfer land in front of the building on Belmont Road (not under colonnade) and Bakers Road from the developer to	A S106 financial contribution and S278 and S38 agreements are included in the recommended Heads of Terms and conditions have been recommended in line with the Highways Officer's recommendations.

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<p>Hillingdon Council; and conditions regarding Residential Travel Plan, Non-Residential Travel Plan, Cycle Lift, Construction Logistics Plan, Delivery and Servicing Plan, Parking Design and Management Plan, and Car Parking Restrictions.</p>	
<p><b>Air Quality Officer:</b></p> <p>No objection subject to an Air Quality Mitigation contribution of £88,533 secured by a Section 106 Agreement and conditions regarding a low emission strategy (LES) and reducing emissions from demolition and construction.</p>	<p>A S106 financial contribution is included in the recommended Heads of Terms and conditions have been recommended in line with the Air Quality Officer's recommendations, except for LES, as disabled person electric vehicle charging spaces are covered by a separate condition.</p>
<p><b>Noise Pollution Officer:</b></p> <p>No objection subject to conditions regarding the impact of the existing environment on the proposed development and the noise impact of the proposed development on the existing environment, as well as informatives regarding external noise and demolition and construction.</p>	<p>Conditions and informatives have been recommended in line with the Noise Officer's recommendations.</p>
<p><b>Environmental Health Officer (Land Contamination):</b></p> <p>No objection subject to a condition regarding land contamination.</p>	<p>A condition has been recommended in line with the Land Contamination Officer's recommendations.</p>
<p><b>Environmental Specialist (Energy and Biodiversity):</b></p> <p>No objection subject to a carbon offset contribution of £276,260 secured by a S106 Agreement and</p>	<p>A S106 financial contribution and 'be seen' obligation are</p>

conditions regarding 'be seen' energy monitoring and landscape.	included in the recommended Heads of Terms. Recommended conditions secure landscape delivery.
<b>Metis (Lead Local Flood Authority):</b>  No objection subject to a drainage condition.	A drainage condition has been recommended in line with Metis' recommendation.

## 7 Planning Assessment

### Principle of Development

- 7.1 The Site is within the Uxbridge Metropolitan Town Centre, Primary Shopping Area (Uxbridge), and Office and Hotel Growth Location (Uxbridge Town Centre) designations. Policy SA 26 of Hillingdon Local Plan Part 2 designates the Site for 'New Homes', stating:  
The site is considered suitable for residential-led mixed use redevelopment subject to the following criteria:
- Provision of upper floor residential units, which must include affordable housing and an appropriate mix of units, provided in accordance with Council standards. Other main town centre uses, such as leisure uses, may be acceptable on upper floors;
  - Retention of ground floor retail uses fronting onto the High Street and provision of main town centre uses, providing active frontages onto Bakers Road and Belmont Road;
  - The redevelopment should enhance the pedestrian thoroughfare of Cock's Yard linking Uxbridge Town Centre and the Bus Interchange;
  - Amenity space and car parking should be provided in accordance with the Council's standards;
  - The redevelopment should sustain and enhance the significance of the adjacent Conservation Area and its setting;
  - The Council will expect redevelopment proposals to reflect the scale and character of the surrounding townscape and have regard to the setting of the Old Uxbridge and Windsor Street Conservation Area and Listed Buildings. Whilst the London Plan density guidance indicates a development potential of up to 120 units, capacity on this site should be led by high quality design, taking account of the site's prominent location; and
  - Proposals should provide scope to incorporate the redevelopment of the land to the south of the site (identified in yellow on the site plan), extending from Cock's

Yard to the Uxbridge Underground Station, in accordance with the principles set out in this policy.

- 7.2 The proposal consists of the demolition of existing buildings and construction of a residential-led mixed-use development comprising 320 co-living homes (13,923 sq. m. GIA), a 162-bedroom hotel (5,827 sq. m. GIA), and re-provision of 1,115 sq. m. of modern commercial floorspace with double-height glazed frontages.
- 7.3 The Council's Policy Team has reviewed the proposal and concurs with the comments below – no Policy Team objections. Similarly, the GLA has reviewed the proposal and supports the land use principle in strategic terms, subject to compliance with Policy H16 of The London Plan (discussed below).

#### *Large-Scale Purpose-Built Shared Living*

- 7.4 Policy H1 of The London Plan aims to increase housing supply and sets Hillingdon Council a net housing completion target of 10,830 between 2019/2020 and 2028/2029. Net non-self-contained accommodation contributes towards meeting housing targets as per Paragraph 4.1.9 of The London Plan (2021), based on a 1.8:1 ratio for co-living accommodation: self-contained home. Therefore, the proposed 320 co-living units would be equivalent to 178 self-contained homes.
- 7.5 The proposed large-scale purpose-built shared living component would provide new homes in Uxbridge Metropolitan Town Centre, aligning with Policy SA 26 of Hillingdon Local Plan Part 2, that states the Site is considered suitable for residential-led mixed-use development.
- 7.6 Furthermore, Policy H16 of The London Plan states large-scale purpose-built shared living development must contribute towards mixed and inclusive neighbourhoods and be in an area well-connected to local services and employment by walking, cycling, and public transport. The additional uplift in homes would contribute towards mixed and inclusive neighbourhoods, providing a housing option for single-person households who cannot or choose not to live in self-contained homes or Houses in Multiple Occupation (HMOs). The application Site, located on the High Street and Primary Shopping Area within the Uxbridge Town Centre, benefits from a Public Transport Accessibility Level (PTAL) of 6a, where a score of 0 indicates very poor access to public transport and 6b indicates excellent access. Notably, Uxbridge London Underground station is approximately 50 metres southeast of the Site. It provides access to the Metropolitan and Piccadilly lines. Additionally, there are several bus stops on Belmont Road and Bakers Road. As such, the site is in an area very well connected to local services and employment by walking, cycling, and public transport. A condition is attached to ensure the accommodation would remain as rented co-living units (and units would not become self-contained homes or be sold) under single management with lease terms of at least three months. An Operational Management Plan would ensure the shared living accommodation is appropriately managed and maintained to ensure the long-term quality.
- 7.7 The NPPF, London Plan, and Local Plan supports the principle of large-scale purpose-built shared living component in this Town Centre location with excellent

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public transport connections, subject to the recommended planning conditions to ensure compliance with Policy H16 of The London Plan. Overall, the principle of the proposal accords with Policy H1, GG4 of the London Plan (2021) and paragraph 77 of the NPPF 2024.

### *Hotel*

- 7.8 A hotel is classified as a town centre use. This proposed hotel would be in Uxbridge Metropolitan Town Centre, within an area designated for Office and Hotel Growth Location (Uxbridge Town Centre). It would be well-connected to public transport and enhance and extend the visitor accommodation supply, adding 162 hotel bedrooms to the town centre.
- 7.9 It should be noted that a standalone application for a hotel (application reference 72722/APP/2019/347) was submitted in 2019. The Applicant withdrew their application prior to determination; however, at the time, Planning Officers considered the principle of the proposed hotel within this location would be supported given it was within a hotel growth designation and town centre, provided the Applicant could robustly justify the loss of the office space. Council Planning Officers subsequently reviewed the Applicant's submitted marketing evidence justifying the loss of the office space and found it acceptable.
- 7.1 The principle of the hotel component is supported considering the site's planning designations, accessible and sustainable location, and nature of the visitor accommodation. As such the proposal accords with Policy E10 of The London Plan, Policy E2 of the Hillingdon Local Plan Part 1, and Policies DME 4 and DME 5 of the Hillingdon Local Plan Part 2.

### *Retail*

- 7.1 The proposal comprises the demolition of the existing 3,582 sq. m. of retail accommodation (Use Class E) and the construction of 1,115 sq. m. of new ground floor retail floor space (Use Class E), representing a loss of 2,467 sq. m. of retail floor space with the Town Centre and Primary Shopping Area.
- 7.1 The GLA has stated in their Stage 1 comments that the proposed reduction in retail floor space does not raise strategic concerns, noting that the site is currently under-occupied and acknowledging the constraints associated with providing a new public square.
- 7.1 The Site is within Uxbridge Town Centre. Therefore, the proposed retail use is acceptable and in accordance with policy.
- 7.1 The Site is within a Primary Shopping Area. Forty-eight per cent of the total frontage of the site would be allocated for commercial uses. This includes most of the frontage along Uxbridge High Street, which is the focus of retail activity. A notable proportion of the frontage along Belmont Road would also be in commercial use. As Policy SA 26 of the Hillingdon Local Plan Part 2 designates the Site for 'New Homes', stating 'The site is considered suitable for residential-led mixed-use development,' a reduction in retail frontage (as stated in Policy DMTC 2) is

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accepted in this case to facilitate the proposed mixed uses and having regard to the matters discussed below.

7.1 Unit 9a Belmont Road (688 sq. m.) and Cocks Yard kiosks 1-4 (72 sq. m.) are  
5 vacant.

7.1 It is well known that high streets have faced significant challenges post COVID-19  
6 where vacancy rates remain higher than pre-covid. As such, planning for retail provision has changed with layouts now being formed by more flexible and modestly sized units. The existing building does not present a valued contribution to the Town Centre or the Conservation Area therefore its replacement is welcomed. Taking into consideration the challenges and retail design changes which are informed by the market, the harm derived by the shortfall in retail reprovision is not considered to be substantial and could be accepted providing the applicant provides evidence of clear public benefits to outweigh the harm.

7.1 It is noted that the principal purpose of the policies which seek to retain  
7 retail/commercial uses within Town Centre's is to safeguard the vibrancy and vitality which is generated by them. The application would provide active commercial frontages around almost the entire ground floor plate, with double height frontages provided, thus creating a more attractive street frontage to what exists at present. The units have been designed to incorporate mezzanines should the end user wish to implement one, which would modestly increase the usable internal area. Furthermore, the co-living element has been designed with the active frontage at ground floor level and all of the commercial units would have a front and back which would allow entry and exit from the high street to the new public open space and vice versa.

7.1 The applicant has engaged in the pre-application advice process where Officers  
8 considered what type of land uses would be most desirable and result in the greatest public benefit. The High Street and wider Town Centre lack attractive public open space, therefore a greater emphasis has been placed on unlocking the site's potential to address this need.

7.1 Notwithstanding the net loss of 2,467 sq. m. of retail floor space, on balance, the  
9 benefits of the proposed development outweigh this harm. Planning benefits would include much-improved quality of the modern replacement retail floor space on Belmont Road and High Street, including double-height facades and mezzanine floors, adding 320 co-living homes and a further 162 new hotel bedrooms to support the functioning of the town centre, and developing a landscaped public square with improved and new pedestrian links. There are also offsite public realm improvements and an in lieu affordable housing contribution of £3,618,409 which would be secured through the S106 legal agreement.

#### *Loss of Office Space*

7.2 As previously stated, the site is designated within a 'Hotel and Office Growth  
0 Location' and the existing development includes approximately 1,524 sq. m. of office floor space (Use Class E) within Bakers House and Belmont Chambers.

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- 7.2  
1 The development plan seeks to safeguard office space within dedicated locations, usually town centres, thus recognising the contribution offices make to employment and the vitality of town centres, due to the footfall the employment generates. As such, the loss of office space must be robustly justified.
- 7.2  
2 The submitted Financial Viability Appraisal notes that the office accommodation has been marketed to let. The Applicant has submitted further evidence to support this point. Evidence has been provided from Levy Real Estate, which demonstrates that the office floorspace has been actively marketed since January 2023 – over two years. The Applicant has also submitted an interest schedule detailing the interest received regarding the existing office space. The enquiries from interested parties did not progress as the potential occupants sought smaller spaces. The existing offices are dated and of poor quality. Due to lack of interest in the Site, the Site has remained predominantly vacant for over 12 months. The Applicant has also undertaken an online market review of available office floorspace along Uxbridge High Street and the immediate surrounding area. This market review has identified 18 vacant office spaces. This review highlights a significant proportion (ranging between 5,441 sq. m. and 29,792 sq. m.) of available office floorspace in this immediate location.
- 7.2  
3 Surrounding employment uses would not be undermined, as the proposed development would introduce 320 co-living units, a new hotel, and modern retail units to the town centre. The Applicant has demonstrated that the offices have been actively marketed for two years without success, and it is no longer a viable use in the context of ongoing office vacancies in the area. The proposal complies with Policy DME 3 of the Local Plan Part 2 and the loss of office space is supported in this instance.

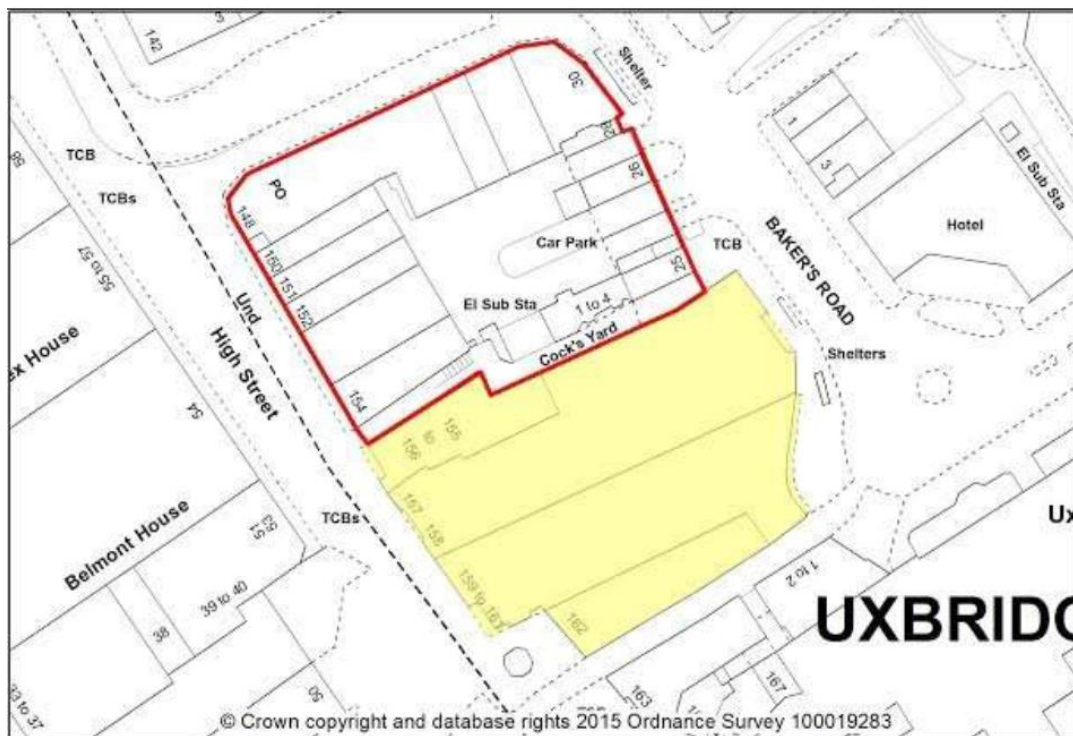
#### *Loss of Self-Contained Housing*

- 7.2  
4 The existing development contains 258 sq. m. of residential (Use Class C3) floorspace.
- 7.2  
5 Policy DMH 1 of the Local Plan Part 2 states that the net loss of existing self-contained housing will be resisted unless the housing is replaced with at least equivalent residential floorspace.
- 7.2  
6 Whilst the proposal would result in the loss of 258 sq. m. of residential (Use Class C3) floorspace, this would be replaced by 13,819 sq. m. of co-living floorspace (Use Class Sui Generis). Whilst this is not conventional C3 housing, it is a significant uplift in residential floorspace – Paragraph 4.1.9 of The London Plan (2021) equates the proposed 320 co-living units (non-self-contained communal accommodation) to be equivalent to 178 single homes based on a 1.8:1 ratio. Notably, the replacement shared living accommodation would contribute significantly to the borough's housing targets in a highly accessible, allocated site in Uxbridge town centre. In addition, the scheme makes a £3,618,409 affordable housing contribution in lieu, secured through the Section 106 agreement.

7.2 For the reasons explained above, the loss of residential (Use Class C3) floor space  
7 is supported in this instance, despite the conflict with Policy DMH 1 of the Local  
Plan Part 2.

### *Comprehensive Redevelopment*

7.2 Policy SA 26 of The Local Plan Part 2 Site Allocations and Designations states that  
8 proposals on this designated Site should provide scope to incorporate the  
redevelopment of the land to the south (identified in yellow on the site plan below),  
extending from Cock's Yard to the Uxbridge Underground Station, in accordance  
with the principles detailed in Policy SA 26. Policy DMHB 11 of The Local Plan Part  
2 further states that development will be required to ensure the design safeguards  
the satisfactory redevelopment of any adjoining sites with development potential.  
Regarding proposals for major development sites, the Council expects developers  
to prepare master plans and design codes and agree on these with the Council  
before developing detailed designs.



*Application Site (red line) and land to the south (shaded yellow)*

7.2 It is considered that the design and layout of the proposed development duly  
9 consider the potential redevelopment of the land to the south. It has been  
sufficiently demonstrated through the planning application submission, that the  
proposal would not compromise the redevelopment potential of the land to the  
south of the Site, and there would be scope for any future redevelopment to the  
south to integrate with Cocks Yard and the proposed public square. Council officers  
endeavoured to get both the application Site and the land to the south to come  
forward as a master plan application, but due to land ownership complexities, this  
could not be achieved. Officers are satisfied that the submitted application would  
allow for the optimisation of the land to the south in accordance with Policy SA 26  
of The Local Plan Part 2 and Policy DMHB 11 of The Local Plan Part 2.

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## Housing Mix

- 7.3  
0 Policy H10 of The London Plan states that schemes should generally consist of a range of unit sizes. Decision-makers should have regard to, amongst other considerations:
- the need to deliver a range of unit types at different price points across London
  - the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
  - the aim to optimise housing potential on sites
  - the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
  - the need for additional family housing and the role of one and two bed units in freeing up existing family housing.
- 7.3  
1 Policy DMH 2 of The Local Plan Part 2 states that the Council will require residential developments to provide a range of different housing sizes to reflect the Council's latest information on housing need.
- 7.3  
2 Family housing is defined within the glossary of The London Plan. It outlines that it must generally be of a size that has three or more bedrooms.
- 7.3  
3 The Council's latest information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties, as identified in the Strategic Housing Market Assessment (2016).
- 7.3  
4 The proposed development would provide 320 co-living units (equivalent to 178 self-contained homes) within Uxbridge town centre. This would strengthen the borough's housing stock for single-person households by providing an alternative housing product for those who cannot or choose not to live in self-contained homes or Houses in Multiple Occupation. It would contribute to reducing pressure on conversion, sub-division, and amalgamation of existing housing stock and could free up existing family housing. The denser, one-bedroom nature of the proposed development would be appropriate and is supported in this sustainable, highly connected town centre location, immediately adjacent to Uxbridge station and bus interchange, with a PTAL of 6a. It would optimise housing potential on-site, led by design and within the context of other site constraints (e.g. re-providing commercial floor space). This type of housing does not currently exist in the town centre. It would not give rise to any over-concentration of large-scale purpose-built shared living accommodation in this location, and it would aid the borough in delivering a range of unit types.
- 7.3  
5 Noting that this would be the first purpose-built co-living scheme of its kind in Hillingdon since the adoption of the GLA's Large-scale Purpose-built Shared Living Guidance, Officers have reviewed examples of similar developments as part of the financial viability assessment process and find this site to be an optimal location for this type of housing.

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7.3 6 Whilst it's acknowledged the proposed scheme would not provide a range of unit sizes as stated in Policy H10 of The London Plan and Policy DMH 2 of The Local Plan Part 2, the proposed development would broadly comply with The London Plan for the reasons detailed above and is appropriate and supported within this highly accessible town centre location.

#### Affordable Housing

7.3 7 The development proposes proposed-built shared living accommodation (referred to as Co-Living), which is not a traditional housing typology. Notwithstanding this point, the development proposes a residential product which, in accordance with The London Plan and Large-Scale Purpose-Built Shared Living London Plan Guidance, is subject to affordable housing requirements. This differs from traditional C3, because the affordable housing provision secured by the authority can be either an upfront cash-in-lieu payment to the local authority or an in-perpetuity annual payment to the local authority. In either case, the Applicant must provide a contribution which is equal to 35 percent of the units, or if this is not viable, submit a financial viability assessment (FVA) that the Local Planning Authority and the GLA robustly test.

7.3 8 The Council appointed BNP Paribas Real Estate (BNPP) to independently review and provide specialist viability advice to the Council regarding the submitted Financial Viability Assessment (reference 2024-055, prepared by Newsteer, dated March 2024). BNPP's advice concluded that the proposed development, with 100 per cent private housing, would generate a Residual Land Value of £13,148,558, providing a surplus of £3,618,409 against the viability benchmark. Accordingly, the Applicant has agreed to pay the Council an in-lieu affordable housing contribution of £3,618,409. The S106 legal agreement shall include early and late-stage viability review mechanisms to ensure that if the scheme's viability improves, then the Council would capture an appropriate uplift in value.

7.3 9 The GLA's Viability Advisor has also reviewed the submission and stated that the affordable housing in lieu payment of £3,618,409 (as agreed between the Applicant and Planning Officers) likely represents the maximum viable amount in this particular case.

7.4 0 Officers consider the Applicant's affordable housing offer to be the maximum reasonable at this stage. The late-stage review mechanism will ensure this is carried through the implementation of the development. The proposed development complies with Policy H16 of The London Plan, The Large-Scale Purpose-Built Shared Living London Plan Guidance and Policy DMH 7 of the Hillingdon Local Plan Part 2.

#### Design / Impact on the Character and Appearance of the Area

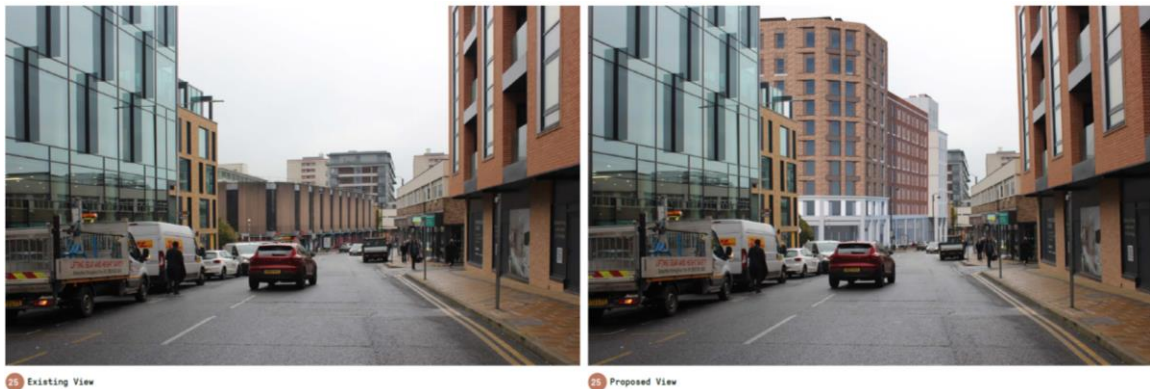
7.4 1 The applicant has engaged in lengthy pre-application discussions to bring forward a scheme which would enhance the Town Centre. This also includes a pre-application Design Review Panel which Officers also attended. This has resulted in a scheme which delivers a balance of residential and commercial uses located

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around a public square. The site is subject to physical constraints such as a moderate level change from the high street up to the corner of Bakers Road. A ramp is also required to be constructed to provide access to the basement level car park and this is a significant constraint on the proposed design of the public square, as the landscaping needs to be elevated above ground level to provide soil depths for planting.

- 7.4  
2 The proposed building's location, arrangement, and uses on the site are logical and appropriate in urban design terms. The proposal comprises active uses at the ground floor level fronting the surrounding streets with regular building entrances and a central public courtyard lined by extensive ground-floor glazing and overlooked by upper-floor windows. This is supported.



*Existing and Proposed View from Belmont Road towards High Street*

- 7.4  
3 Regarding the proposed development's massing and visual impact, Officers agreed on short, medium, and long-range viewpoints with the Applicant for them to test and for the Council to assess. The Applicant duly submitted a document (Additional Views Assessment V.01, prepared by Child Graddon Lewis, dated November 2024) illustrating the proposed development within its urban setting. The proposed built form, massing, and height of the development are appropriate for the surrounding town centre context, within an area highly accessible by public transport (PTAL of 6a). The immediate surrounding context includes large buildings similar to the proposal's height and scale. The neighbouring Premier Inn hotel and adjacent mixed-use building are nine storeys tall, whilst the office block at the corner of Bakers Road and Belmont Road is five storeys. Notably, given the land level changes, these buildings on higher ground to the Site's northeast, on Bakers Road, appear more prominent and would appear similar in height to the proposed ten-storey development that would be on lower ground. Armstrong House and Middlesex House on top of The Pavilions shopping centre, to the Site's southwest, are eight storeys in height. The proposed massing along the north side of the development fronting Belmont Road steps down from ten storeys to eight to provide visual interest and reduce the perceived massing of the site against the lower-density buildings on the opposite side of Belmont Road. This design approach is supported and is contextually appropriate. The building's location, scale, and design would reinforce the spatial hierarchy and aid the legibility and wayfinding of Uxbridge Town Centre.

- 7.4  
4 The building's design and appearance would vary depending on the use (hotel, commercial, co-living) and the street that it fronts (Belmont Road, Bakers Road, High Street), utilising a well-considered and coherent selection of colours within the same family of materials to appropriately articulate the facades. During the planning process, the Council has secured external material details, including white tile specifications for the treatment of the two pedestrian passageways and bricks, mortar, and cladding specifications to ensure high quality variety to the building's elevational treatments. The Applicant has provided examples of the external material's use on architectural award-winning buildings in sensitive locations (within a Conservation Area with several nearby Listed buildings). The Council also secured further architectural detailed study drawings that illustrate the facade's detailing and ensure the elevations would be layered and not appear flat. The massing is further softened by the chamfered corners at the building's junction with High Street, Belmont Road, and Bakers Road, colonnade design feature at ground level, and recessed mansard design of the hotel's upper two storeys. The mixture of building heights and building line and variety of secured materials and colours, along with the detailed architectural elements, would contribute to achieving an appropriate high-quality design and appearance to reflect the development's prominent, central location near to heritage assets.
- 7.4  
5 The proposal complies with Paragraph 131 of the NPPF, Policies D3, D6, and D9 of The London Plan, Policy BE1 of the Local Plan Part 1, and Policies DMHB 11 and DMHB 12 of the Local Plan Part 2.

#### Heritage

- 7.4  
6 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, imposes a statutory duty on Local Planning Authorities requiring that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority 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 2025 sets out a framework of policies which should be referred to when assessing applications which could have the potential to cause harm to the designated and non-designated heritage assets. Paragraph 194 states that development proposals must assess the significance of heritage assets and consider their impact, significant weight should be afforded to their preservation or enhancement. Paragraphs 195 and 196 refer to the assessment of harm and where harm is identified the applicant will need to demonstrate that the scheme would result in significant public benefits in accordance with paragraph 202. There are no listed buildings on the Site, and it is not within a Conservation Area or Area of Special Local Character (ASLC). Notwithstanding, The Site is within the wider Uxbridge Archaeological Priority Area (APA) and between a two-part Conservation Area (Old Uxbridge/Windsor Street). The Conservation Area is approximately 13 metres to the north and south of the Site.
- 7.4  
7 The Conservation Area covers the two main surviving sections of the historic town and is linearly enclosed by buildings that are generally two to four storeys in height. The sections are formed with the buildings facing onto what was once the main road from London to Oxford and around the market area at Windsor Street.

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- 7.4 The north section of the Old Uxbridge/Windsor Street Conservation Area contains several Grade II Listed structures, namely, 64 High Street, 66 High Street, 118 High Street, garden walls to north and east of 118 High Street, 119 High Street, 120 High Street, 122-123 High Street, Watts Hall (to the rear of 126 High Street), 126-126A High Street, 127 and 128 High Street, 129-133 High Street, 134-135 High Street, and 136 High Street. All are part of a cohesive group of linear development from the medieval period onwards. These vary between two and three storeys in height.
- 7.4 The south section of the Old Uxbridge/Windsor Street Conservation Area contains several Listed Buildings. Of particular note, are the Grade II\* Listed Market House and Church of St Margaret, and the Grade II Listed Uxbridge Underground Station and several Grade II Listed Windsor Street and High Street properties.
- 7.5 Christ Church War Memorial is approximately 60 metres north of the site. The National Westminster Bank and St Margarets Church War Memorials are approximately 50 metres and 75 metres south of the site, respectively.
- 7.5 North Uxbridge ASLC is approximately 130 metres north of the Site. Rockingham Bridge Conservation Area is approximately 220 metres southwest of the Site and Uxbridge Lock Conservation Area is approximately 425 metres northwest of the Site.
- 7.5 As the Site is located within an Archaeological Priority Area, the Applicant submitted an Archaeological Desk-Based Assessment (reference PN4147/DBA/1, prepared by Orion, dated May 2024). The Greater London Archaeological Advisory Services (GLAAS) reviewed this assessment. They raised no objection to the proposed development, stating that the assessment indicates that archaeological remains would have been destroyed by the extensive basement constructed across the site in the late 20th century. GLAAS further stated that no archaeological planning condition is required in this instance.
- 7.5 The existing development is of poor architectural quality and does not contribute positively to the Old Uxbridge/Windsor Street Conservation Area's and nearby Listed Buildings' setting. As such, its demolition and site clearance would not harm the surrounding area's heritage assets.
- 7.5 The proposed development would improve the architectural quality and visual contribution of the Site, though given its scale, it would impact the setting of the Old Uxbridge/Windsor Street Conservation Area and nearby Listed Buildings.
- 7.5 The proposed development would impact upon the setting of the Listed High Street buildings to the north of the Site. The proposed development would detract from the prominence and visual interest of these Listed Buildings. However, this impact is largely mitigated given the context of Uxbridge's post-war redevelopment, particularly The Pavilions and inner ring road development. The proposed development's impact would be considered to constitute less than substantial harm (at a low to moderate level), having regard to the categories of harm referred to within the NPPF.



7.5 Similarly, when viewed from the south section of the Old Uxbridge/Windsor Street  
6 Conservation Area, the proposal would rise above existing vistas, most notably  
around Market Square, which still appears relatively enclosed and reflective of the  
historic market town character. The proposed development would impact upon the  
setting of the Listed Buildings within this Conservation Area, particularly the setting  
of the civic group, which includes the church, market hall, and station. As with the  
proposed development's impact on the setting of the Listed Buildings north of the  
Site, the less than substantial harm (at a moderate level) on the heritage assets  
south of the Site would be mitigated due to the context of the substantial  
redevelopment of the area that has occurred in the post-war period.

7.5 The proposed development would not substantially change the Old  
7 Uxbridge/Windsor Street Conservation Area's character. The most significant  
impact would be adjacent to Belmont Road, where there would be a substantial  
increase in building height in contrast to the bank on the opposite side of the road.  
This impact would be considered to constitute less than substantial harm (at a low  
to moderate level). The proposal would not harm the setting of North Uxbridge  
ASLC, Rockingham Bridge Conservation Area, or Uxbridge Lock Conservation  
Area given the separation distance to the proposed development and intervening  
buildings.

7.5 The Council's Conservation Officer has reviewed the submitted Heritage Statement  
8 and planning drawings. They do not raise any objections to the proposed  
development and state that the proposed development would cause less than  
substantial harm.

7.5 Whilst the proposal would cause less than substantial harm to the setting of Listed  
9 Buildings and the Old Uxbridge/Windsor Street Conservation Area, the public  
benefits of the scheme outweigh this less than substantial harm, namely, the  
addition of 320 new town centre co-living homes, new visitor accommodation  
containing 162 hotel bedrooms, 1,115 sq. m. of modern commercial floorspace  
(albeit there would be a net reduction of retail floorspace), and the creation of a  
new, publicly accessible town centre square, including public realm and  
permeability improvements. Furthermore, the Council has secured an in  
lieu affordable housing contribution of £3,618,409.

7.6 The proposed development complies with the NPPF, Policy HC1 of The London  
0 Plan, Policy HE1 of the Local Plan Part 1, and Policies DMHB 1, DMHB 2, DMHB  
3, and DMHB 4 of the Local Plan Part 2.

#### Density

7.6 For flatted development in Uxbridge Town Centre, Table 5.2 of the Hillingdon Local  
1 Plan Part Two ranges from 495 to 1,100 habitable rooms per hectare and 165 to  
405 units per hectare. Policy SA 26 of The Local Plan Part 2 Site Allocations and  
Designations states that the Site is considered suitable for development at a  
density of 360 to 405 units per hectare.

7.6 The 0.38-hectare application Site is within the Uxbridge Metropolitan Town Centre  
2 with access to jobs, services, infrastructure, and amenities. It has a Public

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Transport Accessibility Level (PTAL) of 6a, where a score of 0 indicates very poor access to public transport and 6b indicates excellent access. The Site is therefore very well-connected by existing public transport.

7.6 The Design Review Panel, dated 31 January 2024, supported the aspiration of  
3 high-density design.

7.6 The proposed 320 co-living units on the 0.38-hectare site would be 842 units per  
4 hectare. As discussed in the report's previous two sections (Design / Impact on the Character and Appearance of the Area and Heritage), the proposed density and design is led and appropriately informed by the proposal's excellent access to public transport, surrounding taller-building context, and design merits of the proposed building (supported by a visual impact assessment, detailed technical design drawings, and material specifications) and enhanced public realm.

7.6 The proposed development optimises the site's capacity through a design-led  
5 approach in accordance with Policies D3 and GG2 of The London Plan.

#### Residential Amenity

7.6 The Applicant submitted a Pedestrian Level Wind Desk-Based Assessment (Rev-  
6 B, reference RWDI #2404017, prepared by RWDI, dated 27.03.2024) and a further supporting clarification letter (dated 12.03.2025). The report states that wind conditions at ground level would be suitable. Areas identified likely to be windy are seating at the western corner at ground level, and the eighth floor roof terrace. Wind conditions are not expected to exceed the safety threshold. The technical report recommends wind mitigation measures in the form of landscaping to ensure comfortable environments. A planning condition is recommended to ensure the Applicant implements the recommended wind mitigation measures detailed in the submitted technical report.

7.6 The Applicant submitted a Daylight, Sunlight, and Overshadowing Report (Version-  
7 V1, prepared by Point2, dated March 2024), which concluded that the proposed development would relate well with the neighbouring context and would fall within the practical application of the BRE Guidelines. The Applicant provided an additional letter of clarification regarding daylight, sunlight, and overshadowing (dated 11.03.25). The results of the vertical sky component (VSC) test demonstrate that 244 out of 311 neighbouring windows (78 per cent) would meet the strict application of the BRE Guidelines. The technical assessment demonstrates most BRE transgressions are isolated to 1-3 Bakers Road, located approximately 25 metres northeast of the Site. This impact would occur given its proximity to the Site and the existing self-obstructing design of 1-3 Bakers Road, with deep inset windows limiting the view of the sky from these neighbouring units. This design configuration renders many windows with low existing light levels. Given the low existing value, any increase in development quantum on the application Site would likely render a disproportionate percentage change in 1-3 Bakers Road's daylight/sunlight levels. Most of the BRE transgressions within 1-3 Bakers Road are bedrooms, a classification recognised by the BRE Guidelines to carry less expectation for natural light when compared to a living room. The consultant's assessment concludes that the proposal would fall within the practical application

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of the BRE Guidelines and shows retained daylight/sunlight values commensurate for an urban location.

7.6 Urban Light Surveyors independently reviewed the submitted documents on behalf  
8 of the Council, concluding that the reported effects would substantially meet the default Building Research Establishment (BRE) recommendations. Where the development would not satisfy the default recommendations, in most cases, these would retain good light levels for a dense town centre location. In any event, the level of impact and retained conditions must be judged against the positive benefits of the proposed development as part of the overall planning and amenity balance.

7.6 The proposed roof terrace and the development's windows would be appropriately  
9 separated from neighbouring habitable windows, not resulting in inappropriate direct overlooking.

7.7 Please see relevant sections below regarding odour and noise.  
0

7.7 Whilst some overshadowing would occur following the construction of the 21,000  
1 sq. m. urban centre development, it is considered that this would not be so significant as to justify a refusal of planning permission. On balance, the proposed scheme is supported and broadly complies with the aims of Policy D3 of The London Plan and Policy DMHB 11 of the Local Plan Part 2.

#### Quality of Co-Living Accommodation (Internal and External)

7.7 Policy H16 of The London Plan details design criteria that large-scale purpose-built  
2 shared living accommodation must meet to ensure residential quality, stating:

Large-scale purpose-built shared living development must meet the following criteria:

- 1) it is of good quality and design
- 2) it contributes towards mixed and inclusive neighbourhoods
- 3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency
- 4) it is under single management
- 5) its units are all for rent with minimum tenancy lengths of no less than three months
- 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
  - a) convenient access to a communal kitchen
  - b) outside communal amenity space (roof terrace and/or garden)
  - c) internal communal amenity space (dining rooms, lounges)
  - d) laundry and drying facilities
  - e) a concierge
  - f) bedding and linen changing and/or room cleaning services.
- 7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes

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- 8) a management plan is provided with the application
- 9) it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:
  - a) upfront cash in lieu payment to the local authority, or
  - b) in perpetuity annual payment to the local authority
- 10) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution, to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review.

7.7 The GLA also published its Large-Scale Purpose-Built Shared Living London Plan  
3 Guidance in February 2024, detailing standards for communal spaces and private rooms. The guidance recommends benchmarks based on current best practice of operating co-living developments and states some flexibility in the assessment of co-living applications against the recommended benchmarks may be applied to the design, scale, and provision of these facilities in consideration of the site's location and context, or other scheme-specific factors where it is demonstrated that qualitatively good design outcomes are being achieved.

7.7 GLA Guidance states co-living studios should be no less than 18 sq. m. and no  
4 more than 27 sq. m., while accessible units are generally expected to be between 28 sq. m. and 37 sq. m. The spatial standards of the proposed co-living studios perform well against the GLA Large-Scale Purpose-Built Shared Living London Plan Guidance, and the studios' layout are well planned. The proposed studios would range from 20 sq. m. to 24 sq. m., while the proposed accessible studios would range from 31 sq. m. to 36 sq. m.

7.7 Proposed co-living communal facilities and amenity provision are distributed  
5 throughout the proposed building. Each floor with private studios would include a communal kitchen/dining room. The largest provision of amenity space would be at ground floor and in the basement. During the planning process, in consultation with the Council, the Applicant reconfigured the proposed ground floor and basement plans of the co-living development to provide greater daylight levels to lower floor uses. The proposed co-living laundry facility was repositioned and excluded from amenity contribution, with the basement's co-living gym and cinema room benefiting from further daylight via an enlarged light-well. The basement would also include co-living co-work space. The ground floor consists mainly of resident's co-work space.

7.7 Additionally, triple-aspect communal spaces are provided on upper floor levels,  
6 located adjacent to external amenity at eighth floor level. The eighth floor amenity spaces include a large (94 sq. m.) multi-functional space and a kitchen space residents could book to host events/dinner parties.

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- 7.7 The revised proposed internal co-living amenity space is 1,218 sq. m., which would exceed the 1,067 sq. m. required by the GLA Large-Scale Purpose-Built Shared Living London Plan Guidance.
- 7.7 The recommended benchmark for kitchen space provision is 0.5 sq. m. per resident – 160 sq. m. The proposed development would exceed this, providing 530 sq. m. of communal kitchen/dining space. The GLA's Guidance expects one hob and oven, sink, and draining board per 15 residents – a total of 21. Floor plans illustrate 25 cooking stations, and sinks, draining boards, exceeding policy expectations. Guidance recommends two dining spaces per cooking station – 50. Plans illustrate 146 dining spaces. GLA Guidance recommends a benchmark of one washer and one dryer per 35 residents – nine. Submitted plans illustrate 12 in the basement laundry room.
- 7.7 Similar to residential amenity improvements at proposed lower floor levels, the Applicant condensed the proposed coverage of roof top mechanical plant equipment to increase the proposed co-living roof terrace on revised drawings. The co-living roof terrace would include a grass lawn, soft landscape planting, seating, and an outdoor kitchen. The London Plan requires 320 sq. m. of external communal amenity space (one sq. m. per resident), which would be achieved by the roof terrace. Notably, residents would also have direct access to the pocket park at the development's core. The Internal Daylight and Sunlight Report (Internal Daylight and Overshadowing Report, Version V1, prepared by Point2, dated April 2024) presents a comprehensive internal amenity position for the proposed accommodation, including an overshadowing assessment of the internal courtyard and roof terrace. It has been informed by the architect's submitted drawings. The technical results show that 96 out of 105 rooms (91 per cent) would meet or exceed their use classification target value. All assessed living-kitchen-diners would meet their classification target value. The nine shortfalls are isolated to co-living studios, with the majority on the first floor. Notwithstanding the isolated number of rooms that record internal daylight shortfalls of their classification targets, this level of compliance is considered acceptable in an urban location. When adopting the two-hour in-sun assessment, the recommended overshadowing assessment within the BRE Guidelines (2022), the results show that each assessed space would record in excess of 50 per cent that receives at least two hours in direct sunlight, i.e. full BRE compliance (100 per cent) is recorded.
- 7.8 It is concluded that the proposal would provide future co-living residents with a good standard of living accommodation, with suitable access to internal and external facilities. In this respect, the proposal complies with Policy H16 of The London Plan and GLA Large-Scale Purpose-Built Shared Living London Plan Guidance.

#### Highways and Parking

- 7.8 The Site is within the Uxbridge Metropolitan Town Centre and within a Primary Shopping Area (Uxbridge). It has a Public Transport Accessibility Level (PTAL) of 6a, where a score of 0 indicates very poor access to public transport and 6b indicates excellent access. As such, the Site is highly accessible by public transport.

- 7.8  
2 The Council's Highways Team has been consulted and raises no objection to the proposed development, subject to conditions and S106 legal agreement. Similarly, Transport for London have been consulted and raised no objection, subject to conditions and S106 legal agreement. These conditions and legal agreement terms are recommended in this planning assessment and recommendation.
- 7.8  
3 The proposed development would be 'car-lite', with a total of nine disabled-person car parking spaces in the basement. The GLA, TfL, and Council Officers support this approach. Four of these nine disabled-person car parking spaces would serve the co-living units, and the remaining five would serve the proposed hotel. Having reviewed planning permissions for other similar co-living developments across London (nine examples provided), the Applicant has detailed in their submitted Transport Assessment that it is inappropriate to strictly apply Policy T6.1 of The London Plan to Sui Generis uses, such as co-living, and spaces should be provided based on context-specific factors. In line with approved London co-living precedents, providing four disabled-person spaces would be appropriate in this context. Similarly, the five disabled-person spaces for the hotel use are also accepted. Pedestrians would use the lifts or stairs to access basement car parking. This approach complies with Policies H16 and T6 of The London Plan and is appropriate given the site's 6a PTAL.
- 7.8  
4 Two of the nine disabled person car parking spaces would be equipped with active electric vehicle charging infrastructure. The remaining seven spaces would be fitted with passive electric vehicle charging infrastructure. This complies with London Plan standards. Provision of the vehicle charging infrastructure is a recommended condition.
- 7.8  
5 There would be a residential parking permit restriction (excluding Blue Badge holders) on residents of the co-living development, that would prevent them from obtaining permits to park on-street. A town centre public car park season ticket restriction would also be secured. These are included in the recommended S106 heads of terms.
- 7.8  
6 The proposed development would include 24 short-stay cycle parking spaces (12 Sheffield stands) located on the High Street, Belmont Road, and within Cocks Yard to improve facilities for cyclists visiting the town centre. 240 long-stay co-living spaces would be provided in the basement to serve the 320 co-living units. Fourteen long-stay cycle parking spaces, located within the basement, would serve the proposed commercial units, and nine long-stay cycle parking spaces (also in the basement) would serve the hotel. The proposed quantum of cycle parking meets London Plan standards. A dedicated cycle lift would be accessed from the internal courtyard, designed to comply with The London Cycling Design Standards (measuring at least 1.2m by 2.3m in size) to ensure step free access for all cyclists to the cycle stores. The proposed cycle parking complies with The London Plan.
- 7.8  
7 The proposed vehicular access ramp to the nine disabled person basement car parking spaces has been designed to allow for one-way working, controlled by traffic lights, with sufficient waiting space at the top and bottom of the ramp to allow vehicles to pass one another and for up to two cars to wait at the red signal without impeding Bakers Road. The access and ramp have been designed to align with

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'Car Park Design' guidance published by the Institute of Structural Engineers (June 2023). The design of the vehicular crossover at the top of the ramp would provide pedestrian priority (Copenhagen crossing) with a continuous level footpath for pedestrians across the basement's vehicular access.

7.8 Regarding changes to offsite/on-street parking arrangements, two Belmont Road  
8 pay and display spaces would be repurposed as disabled person parking spaces to be provided on Belmont Road. One motorcycle parking bay would be removed and not replaced. One Bakers Road loading bay would be relocated to facilitate access to the proposed basement parking. A replacement delivery loading bay within Bakers Road would be agreed with the Council in consultation with Transport for London and implemented by the developer on Bakers Road prior to the removal of the existing Bakers Road delivery loading bay. This is recommended as a legal agreement head of term and would ensure uninterrupted provision of a Bakers Road delivery loading bay to serve High Street commercial premises. A further loading bay would be installed on Belmont Road to serve the proposed development. On-street parking changes require Traffic Orders involving formal consultation. These are also recommended within the legal agreement heads of terms.

7.8 Cocks Yard is narrow and twists and turns indirectly around the edge of Bakers  
9 Yard. This convoluted design, combined with being poorly lit and not overlooked, has created safety issues, particularly at night. The proposal offers the opportunity to enhance this aspect of the site; however, Officers acknowledge that a pinch point would remain towards the High Street end, which would be improved and widened once the land to the south of the site comes forward for redevelopment. Notwithstanding, increased glazing and natural surveillance would be introduced along this section of Cocks Yard. The realigned and enhanced Cocks Yard pedestrian route would make a positive contribution to pedestrian accessibility in the town centre and would facilitate improved access to public transport. A new pedestrian route would be created from Belmont Road to High Street through the central landscaped courtyard. Also, the footpath on Belmont Road would be widened, as the proposed building would step back from the existing building line. These aspects are supported.

7.9 In addition, the proposal would enable improvements to surrounding streets. A  
0 Section 278 Agreement is recommended to secure the developer's delivery of off-site highways works, including (but not limited to) York Stone replacement paving and the installation of street trees, on Bakers Road, Belmont Road, High Street (the full width of the pedestrianised area of the High Street between Belmont Road and Cocks Yard but excluding the existing tegula block paving), and Cocks Yard. The developer would pay a further £61,996 Healthy Streets/Active Travel Zone contribution towards the Council improving the borough's active travel infrastructure. Lastly, a £105,000 developer contribution to Transport for London (TfL) would also be required for improvement to bus infrastructure and waiting environments within the borough.

7.9 It is concluded that the transport and Highway impacts of the proposal would be  
1 acceptable, subject to the conditions and obligations set out as part of the Officer's recommendation. The proposal complies with Paragraph 116 of the NPPF, Policies

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T2, T4, T5, T6, T7, and H16 of The London Plan, and Policies DMT 1, DMT 2, DMT 5, and DMT 6 of the Local Plan Part 2.

### Air Quality

- 7.9 The Site is within an Air Quality Management Area and Air Quality Focus Area.  
2
- 7.9 The Applicant submitted an Air Quality Assessment (reference J0830/1/F1,  
3 prepared by Air Quality Assessments Ltd, dated 26.03.2024) and an Air Quality -  
Stage 1 GLA Memo.
- 7.9 The proposed development would be air quality neutral but not air quality positive  
4 and therefore further appropriate mitigation is required.
- 7.9 Mitigation measures to reduce emissions can be applied on-site or off-site. Where  
5 this is not practical or desirable, pollutant off-setting will be applied. The level of  
mitigation required associated with the operation phase of the proposed  
development is calculated using Defra's Damage Cost Toolkit in this instance. Any  
mitigation measures proposed will be 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. Mitigation required to offset the proposed development's traffic  
emissions is £88,533.
- 7.9 The Council's Air Quality Officer has been consulted and raised no objection  
6 subject to an air quality mitigation contribution of £88,533 secured by a Section 106  
Agreement and details relating to a Low Emission Strategy (LES) and reducing  
emissions from demolition and construction. The Section 106 obligation and a  
condition regarding details for reducing emissions from demolition and construction  
are recommended as part of the planning assessment and planning  
recommendation. A separate LES condition is not required, as electric vehicle  
charging space details are covered by a separate condition.
- 7.9 Subject to legal agreement and the recommended conditions, the proposal  
7 complies with Policies SI 1 and GG3 of The London Plan, Policy EM8 of the Local  
Plan Part 1, and Policy DMEI 14 of the Local Plan Part 2.

### Noise

- 7.9 The Applicant submitted a Noise Impact Assessment (prepared by Spectrum  
8 Acoustic Consultants, dated 26.03.2024). Most mechanical plant would be in the  
basement, though additional mechanical plant is proposed on the roof. The Site is  
located within a Metropolitan Town Centre and a Primary Shopping Area with high  
background noise levels. Furthermore, the Site is located on the boundary of the  
bus and train station, which would also generate a higher level of background  
noise.
- 7.9 The Council's Noise Pollution Officer was consulted and raised no objection to the  
9 proposed development subject to compliance conditions regarding the impact of

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the existing environment on the proposed development (internal noise levels) and the noise impact of the proposed development on the existing environment (noise emission levels), as well as informatives regarding external noise and demolition and construction. Appropriate conditions and informatives are recommended as part of the planning assessment and planning recommendation.

7.1 Appropriate conditions are recommended regarding Construction Management  
00 Plan and Hours of Delivery and Use to mitigate and manage potential disturbance to residents.

7.1 The proposal complies with Policies D13 and D14 of The London Plan.  
01

### Odour

7.1 The proposed hotel includes an ancillary kitchen on the eighth floor, whilst the co-  
02 living development would have communal kitchens on each floor with living accommodation. The proposed ground floor commercial space would be within Use Class E, and as such, could be used as restaurants or cafes, including associated kitchens. A planning condition is recommended regarding extraction and odour control to protect residential amenity.

7.1 Subject to condition, the proposal complies with Policy D13 of the London Plan and  
03 Policies DMHB 11 and DMTC 4 of the Local Plan Part 2.

### Health

7.1 The proposal would help to support healthy lifestyles by improving pedestrian  
04 permeability within the town centre to encourage walking by realigning and upgrading the design of Cocks Yard pedestrian route. The scheme also proposes to create a new pedestrian link between Belmont Road to High Street. Notably, the development would provide a new publicly accessible pocket park in the town centre, which landscape architects have designed to include outdoor seating and high-quality green infrastructure.

7.1 The NHS has been consulted regarding the proposed development and raised no  
05 objection. The NHS requested a London Healthy Urban Development Unit (HUDU) financial contribution of £414,307 to fund enhanced or new health facilities within the London Borough of Hillingdon. This financial contribution would be secured within the S106 legal agreement.

7.1 Subject to the recommended conditions to secure the implementation and  
06 maintenance of the public spaces and routes, and subject to the aforementioned planning obligation, the proposal complies with Paragraphs 96 and 101 of the NPPF, Policy GG3 of The London Plan, Policy CI1 of the Local Plan Part 1, and Paragraph 7.2 of the Local Plan Part 2.

### Accessibility

7.1 07 The submitted Design and Access Statement states that ten percent of the co-living bedrooms would be wheelchair adaptable and would measure between 31 sq. m. and 36 sq. m. This provision complies with the Large-Scale Purpose-Built Shared Living London Plan Guidance. This is secured by condition.

7.1 08 The hotel accessible room provision would be as follows:

- eight accessible bedrooms (five percent)
- one accessible bedroom with track ceiling hoist (one percent)
- twelve family rooms (seven percent)
- seven family rooms (adaptable) (four percent)
- 125 standard rooms (78 percent)
- eight standard rooms (ambulant en-suite shower room) (five percent)

7.1 09 The Council's Accessibility Officer has reviewed the proposal and raised no objection subject to a condition requiring the proposed hotel accessible bedroom provision to comply with Policy E10 of The London Plan. An appropriate accessibility planning condition is recommended as part of the planning assessment and planning recommendation that ensures compliance with Policy E10 of The London Plan.

7.1 11 The proposed development is to be car-free except for disabled person parking provision. A total of nine disabled person parking spaces are proposed in the basement, of which four are associated with the co-living and five with the proposed hotel. This level of disabled person parking is supported and a condition regarding a Parking Design and Management Plan is attached as recommend by TfL and the Council's Highways Team.

7.1 12 The GLA has recommended in their Stage 1 comments that the Council require the Applicant to submit further information (including clear diagrams) to demonstrate that the wider site, including the public realm, external amenity, entrances, etc., are appropriately designed for disabled people and people with protected characteristics. An appropriate planning condition is recommended to ensure the Applicant submits further detailed design information at the appropriate time.

7.1 13 Subject to compliance with the recommended conditions, the proposed development complies with Policies D5, D7, and E10 of The London Plan, The Large-Scale Purpose-Built Shared Living London Plan Guidance (2024), Policy DME 6 of the Local Plan Part 2, and Accessible Hillingdon SPD.

### Security

7.1 14 The Council consulted the Metropolitan Police Design Out Crime Officer, who reviewed the proposed development and raised no objection subject to a condition to ensure the development would achieve 'Secured by Design' accreditation. Secured by Design is the official police security initiative aimed at enhancing the security of buildings and their immediate surroundings, providing safe places to live, work, shop, and visit by ensuring effective crime prevention and security standards are met. Achieving 'Secured by Design' accreditation is recommended

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as a planning condition as part of the planning assessment and planning recommendation. As part of the planning consultation process, the proposed development was referred to the Protective Security Operations (Metropolitan Police) for review. They raised no objection to the proposal; however, they made recommendations regarding Counter Terrorism Risk Assessment and Operational Requirement including access control system, detection, and verification, Vehicle Dynamics Assessment and hostile vehicle mitigation measures, laminate glazing, dynamic lockdown system, and post and delivery design. These recommended conditions form part of this planning recommendation.

7.1 The proposed development would provide much-improved active surveillance  
15 around the site through the extent and location of windows when compared to the existing development. The scheme would also include the enhancement of Cocks Yard, with the development improving the visibility of the pedestrian route by realigning it and integrating it with the proposed open public square as well as having windows and doors along the route to further activate it.

7.1 A condition is attached to ensure ground floor glazing is unobstructed, transparent  
16 glass, with alterations to obscure or obstruct the glazing requiring formal submission, to ensure the Council manages any alterations to ground floor/ public realm natural surveillance.

7.1 The proposed new square, whilst open to the public, would be privately owned and  
17 managed. A condition is attached requiring the submission of a public realm management and maintenance plan to ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access, provides a safe and secure environment.

7.1 Officers discussed the type of design which should be adopted for the undercroft  
18 entrances to the Site in great detail. The curved design and use of a light-coloured (white) glazed brick would give the appearance of a generous opening into the public square. With lighting, this area would be visible during darker hours. Details regarding external lighting of outdoor spaces have also been secured by condition to promote safe routes and wayfinding between the development and local amenities.

7.1 Subject to the recommended conditions, the proposal complies with the NPPF,  
19 Policy D11 of The London Plan, and Policy DMHB 15 of the Local Plan Part 2.

#### Urban Greening, Landscaping, and Public Realm

7.1 The existing site suffers from an evident lack of greening and functional, quality  
20 public realm.

7.1 During the planning process, the Council worked with the Applicant to secure  
21 appropriate details pre-determination to ensure fitting landscaping and public realm enhancements. To address the site's current greening and public realm shortcomings, the Applicant has submitted a Landscaping Strategy, Planting Strategy, and Landscape Plan, detailing a proposed new publicly accessible pocket park designed to improve the pedestrian connectivity between Belmont Road,

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Bakers Road, and Uxbridge High Street, enhance existing public realm, and deliver new public realm. Approximately 2,070 sq. m. of the site's ground level would be provided as public open space. A variety of soft landscaping features would be introduced to the new Town Centre green space in the form of lawns, ornamental planting beds, wildflower meadow, trees, and shrubs. Whilst improving pedestrian connectivity and providing well-considered urban greening, this pocket park would also provide outdoor public seating and space for customer spill out from the proposed development's commercial units. For the hard landscape surfaces, the Applicant would use a combination of suitable granite and sandstone surfacing in pedestrian areas and terrace seating.

7.1 22 The initial proposed UGF was 0.16. The GLA's Stage 1 response stated that efforts should be made to explore further enhancements to the proposed greening measures. The Applicant submitted a revised scheme following collaboration with the Council. The revised proposed UGF is 0.36. This score would be marginally below the London Plan's requirement of 0.4 for predominantly residential developments. Notwithstanding the modest shortfall, the proposed development would be a notable improvement on the status quo. The Site is constrained – proposed building footprint and associated active building entrances; existing, enhanced, and new hardstanding pedestrian walkways to improve town centre access and permeability; notable site level changes; basement; opportunities for outdoor seating and commercial and co-living spill out areas; consideration of future development on adjoining land to the south. While the onsite UGF score would not strictly comply with Policy G5 of The London Plan, this would be partly mitigated through the planting of additional street trees secured by a Section 278 Agreement to implement the proposed off-site Highways Works, including (but not limited to) York Stone paving and installation of street trees, on Bakers Road, Belmont Road, High Street, and Cocks Yard. The Applicant has illustrated indicative offsite street tree planting on drawing reference 5903-OOB-ZZ-00-D-L-000001-Rev-P07. On balance, the UGF is supported. The Council's Landscape Officer raised some concerns regarding the amount of shrub planting introduced in the proposed public square and the subsequent reduction in useable area, visibility across the space, and reduction in natural surveillance. The Officer preferred fewer trees to be planted but of a larger species; however, they noted that these requests conflict with the requirement to achieve an appropriate onsite Urban Greening Factor. Unfortunately, due to the change in levels, the need to retain the basement and location of utilities, larger tree planting can't be accommodated onsite. While planting may obstruct some views, the ground floor and upper-level windows, as well as the active use of the space, would achieve appropriate levels of natural surveillance. On balance, considering the Urban Greening Factor requirements, the planting arrangement is accepted. The Landscape Officer also requested details of materials proposed for the seating areas and proposed soil depths for the planting. Details of soil depth and seating materials are recommended in the planning conditions.

7.1 23 The Applicant proposes an area of grass lawn on the co-living roof terrace. The co-living roof terrace would also include raised planters with wildflower meadow planting and flowering perennial mix planting. Additionally, the developments roof would include blue roof, designed to manage and control stormwater runoff. Whilst not strictly in accordance with Policy DME1 1, on balance, the omission of green

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roof or living walls is accepted given the site's constraints and considered planting proposal.

- 7.1  
24 A legal obligation is proposed to ensure that the square remains accessible to the public in perpetuity and a condition is recommended regarding the submission and approval of a Public Realm Management and Maintenance Plan to ensure appropriate management and maintenance arrangements are in place for the public realm, including measures to control anti-social behaviour A Landscape Management Plan is also conditioned to ensure that landscaping and urban greening measures are appropriately maintained. Furthermore, conditions are recommended regarding External Lighting, Public Art and Free Water Drinking Fountain.
- 7.1  
25 As noted previously, the Council would secure a Section 278 Agreement to ensure the developer would implement the proposed off-site Highways Works, including (but not limited to) York Stone paving and installation of street trees, on Bakers Road, Belmont Road, High Street (the full width of the pedestrianised area of the High Street between Belmont Road and Cocks Yard but excluding the existing tegula block paving), and Cocks Yard.
- 7.1  
26 Whilst the proposal would not comply with Policy G5 of The London Plan (2021), on balance, the UGF shortfall is supported in this instance for the reasons explained. The proposal complies with Policy DMHB 14 of the Local Plan Part 2 as it would not harm, but would enhance the area's landscaping, trees, and biodiversity.

#### Public Open Space

- 7.1  
27 Policy EM4 of The Local Plan Part 2 states that the Council will safeguard, enhance, and extend the network of open spaces and informal recreation to meet community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancement of existing facilities.
- 7.1  
28 Hillingdon's Planning Obligations Supplementary Planning Document provides a formula for calculating open space requirements – 20 sq. m. per unit multiplied by the average household size (2.67, according to the 2011 census data). In the instance of this proposed development, it would be disproportionate to apply the household size of 2.67, as the proposal consists of a large-scale purpose-built shared living development containing one-bedroom, one-person studios, and would not be a standard household size. The London Plan equates 320 co-living units to 178 self-contained homes. On this basis, it would be appropriate to use the following formula – 20 sq. m. multiplied by 178 units. This equates to an open space provision of 3,560 sq. m. The proposed development includes a public open space of 2,070 sq. m., resulting in a shortfall of 1,490 sq. m. Whilst there would be a shortfall, weight is given to the quality of the proposed open space, including new and enhanced pedestrian routes, urban greening and biodiversity enhancements, outdoor seating, and public art. Further weight is given to the proposed open space's High Street Town Centre location which is strongly supported.

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7.1 On balance, the shortfall in the quantity of open space is accepted in this instance,  
29 given the proposal's policy-compliant level of amenity space for the co-living occupants, and the public benefit of the quality, quantity, and location of the proposed public square.

### Children's Play Space

7.1 Policy S4 of The London Plan seeks to ensure that development proposals include  
30 good-quality, accessible, tenure-blind play and recreation spaces for all ages - at least ten sq. m. per child. Policy H16 of the London Plan and The Large-Scale Purpose-Built Shared Living London Plan Guidance do not require the provision of children's play space.

7.1 Policy DMCI 5 of the Local Plan Part 2 states that for all major development  
31 proposals, the Council will apply Hillingdon's child yields and The London Plan SPG 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies developments should provide ten sq. m. of play space for each child and an accessibility standard of 400 metres to equipped playgrounds. In areas of deficiency, the Council will require new provisions to meet the benchmark standards for accessibility to play provision.

7.1 The GLA Population Yield Calculator is a tool for estimating population yield from  
32 new housing development. The calculator provides users with an indication of the possible number and age of children that could be expected to live in a new housing development of a given bedroom or tenure mix. Given the nature of the large-scale purpose-built share living accommodation, designed to accommodate single persons, it is not anticipated to house children.

7.1 The proposal would introduce a new public square, which would benefit the local  
33 area. The Applicant has designed this proposed public space to incorporate trees and planting to contribute towards urban greening and onsite biodiversity net gain. It would also include hard-landscaped areas to improve pedestrian permeability and facilitate outdoor seating for socialising and use by the proposed development's tenants. The provision of children's play equipment within the public square would likely compromise the pedestrian permeability of the area and planting arrangement (UGF and BNG) and has not been included. Fassnidge Park is within five minutes' walking distance from the Site, located on the edge of the Town Centre. This nearby park features children's formal and informal play equipment. Therefore, although the proposed development would not deliver onsite children's play space within the site's boundary, it is available locally. The omission of children's play space within this confined site is considered appropriate in this instance.

7.1 The GLA's stage 1 response has not raised concerns regarding children's play  
34 space provision. On balance, the omission of children's play space is acceptable in this instance given the nature of the proposed housing type.

### Biodiversity

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7.1 The Applicant submitted a Preliminary Ecological Appraisal and Preliminary Roost  
35 Assessment (Issue-2.1, prepared by Arbtech, dated 21.03.2024) to establish the ecological value of the site and the presence/likely absence of notable and/or legally protected species. This report concludes that there is no vegetation on site and there are no habitats of ecological value on the site. It does not identify any significant ecological impacts because of the development but recommends that one bat emergence or re-entry survey is undertaken during the active bat season to confirm the presence or likely absence of a bat roost in the building. It also recommends a low-impact lighting strategy designed in accordance with Guidance Note GN08/23 Bats and Artificial Lighting at Night (Institution of Lighting Professionals, 2023) and the undertaking of works outside of the nesting bird season. It provides recommendations for improving ecology on the site, including the redevelopment of the existing servicing site, planting of native shrubs and trees, and the installation of a peregrine nest box and a swift tower. A planning condition is recommended to ensure the Applicant implements the recommended ecology measures.

7.1 The Applicant also submitted a Biodiversity Net Gain Assessment (Issue-1.1,  
36 prepared by Arbtech, dated 22.03.2024). The existing site delivers 0.0 habitat units. As such, a percentage gain cannot be calculated. Nonetheless, the post development habitat value of the site would be 0.21 units, comprising the creation of buildings and hardstanding (0 units), modified grassland (0.09 units), and urban trees (0.13 units). This would result in a net gain of onsite biodiversity.

7.1 The Council's Environmental Specialist (Energy and Biodiversity) reviewed the  
37 submitted biodiversity details and raised no objection regarding the proposed development. A condition has been recommended regarding BNG and habitat management.

7.1 Subject to the aforementioned planning condition, the proposed development  
38 complies with Policy 15 of the NPPF, Policy G6 and Paragraph 8.6.6 of The London Plan, and Policy DME1 7 and Paragraph 6.28 of the Local Plan Part 2.

#### Flooding and Drainage

7.1 The Site is in Flood Zone 1 (lowest flood risk) and is not within a Critical Drainage  
39 Area. Surface Water Flooding impacts a small (approximately 170 sq. m.) area towards the centre of the Site.

7.1 The applicant submitted a Flood Risk Assessment and Drainage Strategy,  
40 (reference 231022-EDGE-XX-XX-RP-C-0001\_ Flood Risk Assessment-P02, prepared by Edge Consulting Engineers, dated 26.03.2024), Roof Drainage Plan (XB-CGL-Z2-09-DR-A-SK50007), and a Letter, RE LLFA Response (reference 231022-EDGE-XX-XX-CO-C-0003\_LLFA RESPONSE-Rev-P01, prepared by Edge Consulting Engineers, dated 11.03.2025).

7.1 The site's location within Flood Zone 1 means it is unlikely to be affected by fluvial  
41 flooding. The existing site comprises buildings and hardstanding with a basement car park beneath. As such, there are no natural forms of attenuation within the site boundary. Whilst the proposed public square would include a moderate level of soft

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landscaping, retaining the basement level restricts the possibility of more natural attenuation at the ground level. Surface water for the proposed development would be stored within a blue roof system and further flood mitigation to serve the public square in the form of an attenuation tank have been secured within the above plans. While the proposed development would not meet greenfield runoff rates, the proposed runoff rate would significantly improve existing brownfield rates and would not increase flood risk on or off the site.

7.1 The Lead Local Flood Authority has reviewed the submitted drawing and technical  
42 documents and is satisfied with the proposal subject to condition. An appropriate drainage condition is recommended as part of this planning recommendation.

7.1 Subject to the recommended condition, the proposed development complies with  
43 Policies SI12 and SI13 of The London Plan, Policy EM6 of the Local Plan Part 1, and Policies DMEI 9 and DMEI 10 of the Local Plan Part 2.

#### Water Efficiency

7.1 To ensure the development would minimise the use of mains water in line with the  
44 Optional Requirement of the Building Regulations (residential development), a compliance planning condition is recommended for it to achieve mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption), achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development), and incorporate measures such as smart metering, water saving, and recycling measures, including retrofitting.

7.1 Subject to the recommended condition, the proposal complies with Policy SI 5 of  
45 The Lonon Plan.

#### Energy and Sustainability

7.1 The Applicant has submitted a TM54 Operational Energy Evaluation Report  
46 (reference 5023602-RDG-XX-XX-RP-ME-510000, prepared by Ridge, dated 28.10.24), a revised Whole Life Carbon Assessment (V3, prepared by Ridge, dated 31.10.2024), a revised Energy Strategy Report (V5, reference 5023602-RDG-XX-XX-RP-ME-510000, prepared by Ridge, dated 28.09.2024), and a BREEAM Pre-Assessment (Version 1.0, Hotel and Co-Living, prepared by Ridge, dated 21.03.2024).

7.1 Air Source Heat Pumps (ASHP) would be used to generate heating, cooling, and  
47 hot water for the proposed development. 285.2 sq. m. of photovoltaic roof-mounted panels are also proposed to offset a percentage of the proposed development's energy demand on the co-living block. The Applicant states the proposed energy strategy allows plant space suitable for potential plate heat exchangers and pump sets associated with a District Heat Network (DHN) connection to ensure compliance with Policy DMEI 3. The BREEAM Pre-Assessment demonstrates the current anticipated baselines score is 78.45 percent for the co-living amenity block and 75.25 per cent for the combined co-living and hotel amenity block. Both scores



are equivalent to a BREEAM 'Excellent' rating and therefore accordance with Policy EM1 of the Local Plan Part 1 and Policy DMEI 2 of the Local Plan Part 2.

7.1 The GLA has reviewed the details and advised that it does not yet demonstrate full  
48 compliance with Policy SI2 of The London Plan. The GLA recommended a condition regarding a revised whole life-cycle carbon assessment and post-construction assessment details to be submitted to report on the development's actual WLC in accordance with the published Whole Life Carbon Assessment Guidance to ensure compliance with the requirements and a condition regarding future connection to a DHN. Appropriate conditions are recommended as part of the planning assessment and planning recommendation.

7.1 The Council's Environmental Specialist (Energy and Biodiversity) reviewed the  
49 submitted details and noted the submitted technical report identifies a reduction in CO2 across the development of greater than 35 per cent – the proposal would achieve 36 per cent reduction. They stated there would be a shortfall of 2,908 tonnes of CO2 per annum (annualised over 30 years). The Council's Environmental Specialist advised this would require a carbon offset payment of £276,260 to comply with policy. They also recommend securing 'be seen' post-construction energy monitoring and raised no objection to the proposed development subject to a carbon offset contribution and energy monitoring. Carbon offset contribution and energy monitoring are contained within the Heads of Terms and would be secured within the S106 legal agreement.

7.1 Notwithstanding the Council's Environmental Specialist's positive consultation  
50 response, the GLA requested some further information regarding energy and sustainability. The Applicant has submitted these details and the GLA has been reconferred. Revised GLA comments have not yet been received but will be duly addressed in the Planning Committee Addendum, or through the Stage II referral (as required).

7.1 Subject to legal agreement and the recommended conditions, the proposal would  
51 comply with Policies SI2 and SI3 of The London Plan, Policy EM1 of the Local Plan Part 1, and Policies DMEI 2 and DMEI 3 of the Local Plan Part 2.

### Overheating

7.1 The Applicant submitted an Overheating Risk Assessment (prepared by Ridge,  
52 dated 28.10.24) which concludes that all spaces achieve their required criteria under TM52. This compliance is achieved using the current design conditions as outlined within the report where the building uses both mechanical ventilation and additional cooling to some spaces to mitigate overheating. The Applicant also submitted a revised Energy Strategy Report (V5, reference 5023602-RDG-XX-XX-RP-ME-510000, prepared by Ridge, dated 28.09.2024) which details that Central and Local Mechanical Ventilation with Heat Recovery (MVHR) with high-efficiency heat pump heating and cooling is proposed as the strategy for ventilation and comfort within the non-residential areas of the development. These systems would provide fresh air and heat recovery to the individual rooms of the development. Heat Recovery reduces the required cooling and heating load which would in turn reduce the development's CO2 emissions. Natural ventilation with additional

Mechanical Extract Boost Ventilation combined with high-efficiency heat pump heating and cooling is proposed as the strategy for ventilation and comfort within the co-living spaces of the development. These units would allow user control over fresh air and highly efficient thermal comfort solutions to heat and cool those spaces. The low-energy, high-Coefficient of Performance (COP) solutions provide a strategy that can achieve thermal comfort whilst reducing the development's CO2 emissions. Glazing that limits the amount of unwanted solar gain would be used to avoid habitable rooms from overheating with G-Values of 0.4. Passive design measures would stabilise the temperatures within the building and enable it to adapt to extremes of both high and low temperatures.

7.1 The Council's Environmental Specialist (Energy and Biodiversity) has been  
53 consulted and raised no concerns regarding the potential for internal overheating.

7.1 A condition is attached to ensure development is carried out in accordance with the  
54 relevant TM49 and TM52 guidance and as detailed in the submitted Overheating Risk Assessment and Energy Strategy Report.

7.1 Subject to condition, the proposal complies with Policy SI4 of The London Plan.  
55

#### Waste Management

7.1 The Applicant has submitted a revised Circular Economy Statement (Rev-02,  
56 prepared by Savills Earth, dated 22.11.2024) and completed the GLA's Circular Economy template in accordance with guidance. They have also submitted an Operational Waste Management Plan (prepared by Caneparo Associates Limited, dated November 2024).

7.1 The GLA has reviewed the submitted details and advised that it does not yet  
57 demonstrate full compliance with Policy SI 7 of The London Plan. The GLA recommended a condition regarding the submission of a revised Circular Economy Statement, a Pre-Redevelopment Audit and an Operational Waste Management Plan, and post-construction to ensure compliance with the requirements. As such, an appropriate condition is attached.

7.1 The Council's Waste Services Team has reviewed the submitted documents and  
58 raised no objection to the proposed development.

7.1 Subject to condition, the proposal would comply with Policy D6 and SI 7 of The  
59 London Plan.

#### Airport Safeguarding

7.1 The Applicant submitted an Aviation Safeguarding Assessment (prepared by Alan  
60 Stratford and Associates Ltd, dated April 2024). The report concluded that the proposed building, which has a maximum elevation of 80.150 metres, would not breach the obstacle clearance surfaces specified under the Civil Aviation Authority (CAA) licences for three airports and airfields that are within ten kilometres of the proposed development. Given the expected height of aircraft using any instrument

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flight procedures near the development, it would represent an obstacle within the flight path signal guidance provided. Given the presence of similar tall buildings in the Uxbridge area, it is unlikely that the proposed development would give rise to any signal distortion to radar and other nav aids. There would be no adverse impacts from building turbulence or glare from the use of solar panels or glazing given the nature of flight paths and the likely height of any aircraft that might be in the vicinity of the proposed development. The CAA would need to be notified about the use of cranes during building construction and these would need suitable marking and lighting. London Heathrow Airport and the CAA would need to give consent for a temporary breach of the OCS as the crane(s) are likely to exceed the lower level of the IHS, although we see no reason why this consent should not be given.

7.1 The Council consulted the National Air Traffic Services, which raised no objection  
61 to the proposal. The Ministry of Defence (MoD) were also consulted. MoD raised no objection subject to conditions regarding a Construction Management Plan and Bird Hazard Management Plan. These two recommended conditions are attached.

7.1 Subject to conditions, the proposal complies with Policy DMAV 1 of the Local Plan  
62 Part 2.

#### Land Contamination

7.1 The Site is within a Potentially Contaminated Land area.  
63

7.1 The Applicant submitted a Contamination Assessment (reference 11220G/AP/03,  
64 prepared by JPP Geotechnical & Environmental Ltd, dated 27.03.2023) that concluded the ground conditions do not present an unacceptable risk of harm to identified receptors with an overall derived low risk for each of the receptors identified by our conceptual model. In areas of soft landscaping at ground level, any made ground should be removed to a prudent depth of 300mm and the importation of a topsoil material should be considered as a suitable growth medium.

7.1 The Council's Land Contamination Officer has been consulted and advised that  
65 they have no objection to the proposed development. The Officer recommended a land contamination condition which has been attached.

7.1 Subject to condition, the proposal complies with Policies DMEI 11 and DMEI 12 of  
66 the Local Plan Part 2.

#### Fire Safety

7.1 The Applicant submitted a Fire Statement Form (prepared by B Youssef, dated  
67 27.03.2024), a London Plan Fire Statement (reference HL9152-Issue 2, prepared by Jensen Hughes, dated 27.03.2024), and a Technical Note (reference HL9152/BY/Issue 1, RE London Fire Brigade Comments, prepared by Jensen Hughes, dated 09.01.2025) prepared by suitably qualified persons. The Fire Statement confirms that the co-living development has been designed using British

Standard 9991 (BS9991:2015), and the non-residential space located at ground floor level has been designed using British Standard 9999 (BS9999).

7.1 The technical aspects of the materials to be used in any development, in relation  
68 to fire safety, are considered under the Building Act (1984) and specifically the Building Regulations, Approved Document B amended version (2022). These require minimum standards for any development, although the standards would vary between residential and commercial uses and in relation to new build and change of use/conversions. The Regulations cover a range of areas including structure and fire safety. If planning permission is granted, the proposed development would require separate building control approval in due course. As part of the building control process, the regulator would carry out an examination of drawings for the proposed works and make site inspections during construction work to ensure the works are carried out correctly. On completion of work, the regulator would issue a Completion Certificate to confirm that the works comply with the requirements of the Building Regulations.

7.1 The fire strategy will be subject of further review during the detailed design stages  
69 to ensure compliance with relevant building design requirements, including the relevant Building Regulations and other recommendations set out in BS9991:2015, Fire safety in the design, management and use of residential buildings – Code of practice and BS 9999: 2017, Fire safety in the design, management and use of buildings - Code of practice.

7.1 The Health and Safety Executive (HSE), London Fire Brigade (LFB), and GLA have  
70 reviewed the scheme with regard fire safety. The HSE, LFB, and GLA did not raise an objection to the proposed development. HSE raised matters for the Applicant to address at later regulatory stages. LFB provided the standard Guidance Note 29 relating to Fire Brigade access to buildings for the Applicant's due consideration. LFB also made observations regarding the Fire Statement and evacuation strategy which LFB state will need to be addressed at building control consultation stage. The GLA also made observations regarding the Fire Statement and evacuation strategy.

7.1 Submission of a revised Fire Statement is recommended by condition to ensure  
71 the safety of all building users in accordance with Policy D5 and D12 of the London Plan (2021).

7.1 Subject to the recommended condition, the proposal complies with Policy D12 of  
72 The London Plan.

#### Planning Obligations

7.1 Policy DMCI 7 of the Local Plan Part 2 states to ensure development is sustainable,  
73 planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL). Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes, where development has infrastructure needs that are not

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addressed through CIL, and to ensure that development proposals provide or fund improvements to mitigate site-specific impacts made necessary by the proposal. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

7.1 The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant  
74 to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6 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

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

7.1 Section 106 Heads of Terms are as follows:  
76

1. In lieu affordable housing contribution of £3,618,409. The S106 agreement shall include an Early and Late-Stage Viability Review mechanism.
2. Air Quality Mitigation contribution of £88,533.
3. A Carbon Offset contribution of £276,260.
4. London Healthy Urban Development Unit (HUDU) financial contribution of £414,307 to fund enhanced or new health facilities within the London Borough of Hillingdon.
5. An Employment/Construction Training Scheme secured in accordance with the Council's Planning Obligations SPD.
6. Residential Parking Permits restriction (excluding Blue Badge holders).
7. A Healthy Streets/Active Travel Zone contribution of £61,996 within the London Borough of Hillingdon.
8. A £4,500 contribution towards implementing traffic orders within the London Borough of Hillingdon.
9. A £105,000 contribution to Transport for London (TfL) towards measures to improve the bus infrastructure and waiting environment within the London Borough of Hillingdon.
10. A Section 278 Agreement to implement the proposed off-site Highways Works, including (but not limited to) York Stone paving and installation of street trees, on Bakers Road, Belmont Road, High Street (the full width of the pedestrianised area of the High Street between Belmont Road and Cocks Yard but excluding the existing tegula block paving), and Cocks Yard.
11. A Section 38 Agreement to transfer land in front of the building line on Belmont Road (not under colonnade) and Bakers Road to Hillingdon Council.
12. Public Square to remain publicly accessible in perpetuity.
13. 'Be Seen' post-construction energy monitoring to be carried out in accordance with the GLA 'Be Seen' energy monitoring guidance document (2021).

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14. A replacement delivery loading bay within Bakers Road shall be agreed with the Council in consultation with Transport for London and implemented by the developer on Bakers Road prior to the removal of the existing Bakers Road delivery loading bay.

15. A Section 247 stopping up order agreement for the developer to take ownership and ongoing maintenance of the public access through Cocks Yard to secure continued public access between Bakers Road and the High Street and associated management and maintenance.

16. A town centre public car park season ticket restriction.

17. A Project Management and Monitoring Fee, equalling 5% of the total financial contributions to be paid under this agreement.

### Environmental Impact Assessment

- 7.1 No EIA Screening Opinion Request was submitted to the Council; however, given  
77 the scale, nature, and location of the proposal, officers have determined that an EIA would not be required as the development's impacts would be local.

## **8 Other Matters**

### Human Rights

- 8.1 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

### Equality

- 8.2 Due consideration has been given to Section 149 of the Equality Act with regard to the Public Sector Equality Duty in the assessment of this planning application. No adverse equality impacts are considered to arise from the proposal.

### Local Finance Considerations and CIL

- 8.3 As of 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100 sq. m. or more were liable for the Mayoral Community Infrastructure Levy (CIL), as legislated by the CIL Regulations 2010 and The CIL (Amendment) Regulations 2011. From April 2019, the liability payable is £60 per sq. m. The MCIL2 charging schedule rate, including indexation for calendar year 2025, is £71.09 per sq. m.

- 8.4 The London Borough of Hillingdon Council is a collecting authority for the Mayor of London, and this liability shall be paid to the London Borough of Hillingdon Council in the first instance.

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8.5 In addition to MCIL2, the development represents Chargeable Development under the Hillingdon CIL, which came into effect on 1 August 2014. The liability payable is as follows:

- Retail development greater than 1,000 sq. m. outside designated town centres - £215 per sq. m.
- Offices - £35 per sq. m.
- Hotels - £40 per sq. m.
- Residential Dwelling Houses - £95 per sq. m.
- Industrial - £5 per sq. m.

8.6 This CIL liability is in addition to the Section 106 planning obligations.

8.7 The proposed development consists of the following floor areas:

8.8 Hotel (Use Class C1) – 5,802 sq. m.  
Co-Living (Sui Generis) – 13,819 sq. m.  
Retail (Use Class E) – 1,094 sq. m.

8.9 The construction of these floor areas results in the following CIL charges:

Local CIL - £244,694.62  
Mayoral CIL - £1,035,958.05

## **9 Conclusion / Planning Balance**

9.1 The principle of development is supported. The building's height, scale, and mass are appropriate for its town centre location at a transport interchange. The Council has worked with the Applicant to refine the development's design during pre-application and the full planning application process, securing floor plan and site/landscape amendments, high-quality external materials, and architectural detailing. The proposed development would cause less than substantial harm to the neighbouring Conservation Area and nearby Listed Buildings, but this would be outweighed by the public benefits of the proposed scheme. The quality of co-living accommodation complies with the London Plan and London Plan Guidance. Whilst the proposal would have some impact upon neighbouring amenity, on balance, the identified overshadowing impact would not be so significant as to justify a refusal of planning permission. The Council's Highways Team, the GLA, and TfL support the car-free (except for nine disabled person parking spaces in the basement) nature of the proposed development in this highly accessible town centre location and raise no highways objections, subject to the recommended conditions and legal agreement heads of terms.

9.2 The proposal has been assessed in accordance with the development plan, whilst it is noted that there are some shortfalls in compliance this is not unusual for a major scale development. The proposal would result in some harm however officers consider the harm to be limited. Paragraph 11 of the NPPF 2025 recognises the challenges developments will have in achieving compliance with the development plan in its entirety and encourages a balanced approach to be taken

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to weighing the benefits of the proposal against the harm identified. In this case the proposal would bring forward the regeneration of a corner of the high street, further enhancing the vitality of this area and the Town Centre as whole. This would result in employment retention, the optimisation of a brownfield site to provide a contribution towards local housing stock, an affordable housing contribution and the delivery of a new public square. All of these benefits are considered to outweigh the limited harm identified by Officers and as such the proposal would accord with paragraph 11 of the NPPF.

On balance therefore, the proposal is deemed to be acceptable and would be consistent with the overarching aims of the National Planning Policy Framework, The London Plan, and Hillingdon Local Plan.

- 9.3 The planning application is therefore recommended for approval, subject to the conditions set out in Appendix 1, the Section 106 Heads of Terms detailed in this report, and subject to the necessary Stage II referral to the Greater London Authority.

## **10 Background Papers**

- 10.1 Relevant published policies and documents taken into account in respect of this application are set out in the report. Documents associated with the application (except exempt or confidential information) are available on the [Council's website here](#), by entering the planning application number at the top of this report and using the search facility. Planning applications are also available to inspect electronically at the Civic Centre, High Street, Uxbridge, UB8 1UW upon appointment, by contacting Planning Services at [planning@hillingdon.gov.uk](mailto:planning@hillingdon.gov.uk).



# **APPENDICES**

## **Planning Application**

**78696/APP/2024/867**

## Appendix 1: Recommended Conditions and Informatives

### Conditions

#### 1. COM3 Time Limit

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

#### REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

#### 2. COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

UXB-CGL-Z0-XX-DR-A-060108-Rev-A; UXB-CGL-Z0-XX-DR-A-060109-Rev-A; UXB-CGL-Z0-XX-DR-A-061105-Rev-C; UXB-CGL-Z0-XX-DR-A-061106-Rev-C; UXB-CGL-Z1-ZZ-DR-A-062134; UXB-CGL-Z1-ZZ-DR-A-062135; UXB-CGL-Z2-XX-DR-A-062130-Rev-A; 5903-OOB-ZZ-00-D-L-000001-Rev-P07; 5903-OOB-ZZ-00-D-L-000040-Rev-P04; 5903-OOB-ZZ-00-D-L-000071-Rev-P05; UXB-CGL-Z0-RF-DR-A-000113-Rev-B; UXB-CGL-Z1-ZZ-DR-A-051104-Rev-C; UXB-CGL-Z0-B1-DR-A-0501B1-Rev-C; UXB-CGL-Z0-XX-DR-A-060112-Rev-B; UXB-CGL-Z0-XX-DR-A-060113-Rev-B; UXB-CGL-Z0-XX-DR-A-060114-Rev-B; UXB-CGL-Z0-XX-DR-A-060115-Rev-B; UXB-CGL-Z0-XX-DR-A-060125-Rev-A; UXB-CGL-Z0-XX-DR-A-062103-Rev-B; UXB-CGL-Z0-XX-DR-A-062104-Rev-A; UXB-CGL-Z0-ZZ-DR-A-000110-Rev-A; UXB-CGL-Z1-XX-DR-A-061121-Rev-A; UXB-CGL-Z1-XX-DR-A-062133; UXB-CGL-Z1-ZZ-DR-A-051101-Rev-A; UXB-CGL-Z1-ZZ-DR-A-051102-Rev-A; UXB-CGL-Z1-ZZ-DR-A-051103-Rev-A; UXB-CGL-Z2-00-DR-A-052100-Rev-B; UXB-CGL-Z2-01-DR-A-052101-Rev-A; UXB-CGL-Z2-08-DR-A-052108-Rev-A; UXB-CGL-Z2-XX-DR-A-062120-Rev-A; UXB-CGL-Z2-XX-DR-A-062122-Rev-B; UXB-CGL-Z2-XX-DR-A-062123-Rev-A; UXB-CGL-Z2-XX-DR-A-062132; UXB-CGL-Z2-ZZ-DR-A-052102-Rev-A; UXB-CGL-Z2-ZZ-DR-A-052109-Rev-A; 5903-OOB-ZZ-00-D-L-000010-Rev-P07; 5903-OOB-ZZ-00-D-L-000020-Rev-P03; 5903-OOB-ZZ-00-D-L-000030-Rev-P03; 5903-OOB-ZZ-08-D-L-000002-Rev-P04; 5903-OOB-ZZ-ZZ-D-L-000050-Rev-P04; 5903-OOB-ZZ-ZZ-D-L-000051-Rev-P03; 5903-OOB-ZZ-ZZ-D-L-000052-Rev-P01; UXB-CGL-Z2-09-DR-A-SK50007; UXB-CGL-Z0-XX-DR-A-062106; UXB-CGL-Z0-XX-DR-A-062105; UXB-CGL-Z0-XX-DR-A-062101; UXB-CGL-Z0-XX-DR-A-062102; UXB-CGL-Z0-ZZ-DR-A-000112; UXB-CGL-Z0-ZZ-DR-A-000114; UXB-CGL-Z2-ZZ-DR-A-052120; UXB-CGL-Z2-ZZ-DR-A-052121;

and shall thereafter be retained/maintained for as long as the development remains in existence.

#### REASON

To ensure the development complies with the provisions of The London Plan (2021) and the

Local Plan Parts 1 (2012) and 2 (2020).

### **3. COM5 General compliance with supporting documentation**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted documents, references:

5903-OOB-XX-XX-RP-L-0005-Rev-P01 (Hard Landscape Materials Palette); TM52 Overheating Risk Assessment Report (Coliving and Hotel), prepared by Ridge, dated 28.10.24; TM54 Operational Energy Evaluation Report, reference 5023602-RDG-XX-XX-RP-ME-510000, prepared by Ridge, dated 28.10.24; Uxbridge Coliving Thermal Comfort Overheating Report, V1.0, prepared by Ridge, dated 28.10.24; Energy Strategy Report-Version 5, reference 5023602-RDG-XX-XX-RP-ME-510000, prepared by Ridge, dated 28.09.2024; 5903-OOB-XX-XX-RP-L-5300-Rev-P03 (Revised Landscape Design and Access Statement-Rev-P03); Material Samples, dated February 2025; Blue Roof Design-Rev-A, prepared by Bauder Ltd, dated 23.09.2024; Bauder - Blue Roof Ballasted System Specification; Operational Waste Management Plan, prepared by Caneparo Associates Limited, dated November 2024; Transport Assessment Addendum, reference N03-CC-Transport Addendum F2 (241127), prepared by Caneparo Associates, dated November 2024; Aviation Safeguarding Assessment, prepared by Alan Stratford and Associates Ltd, dated April 2024; Basement Structural Impact Assessment, reference 231022-EDGE-XX-XX-RP-S-0001\_Basement Structural Impact Assessment-P01, prepared by Edge Consulting Engineers, dated 02.05.2024; Internal Daylight and Overshadowing Report, Version V1, prepared by Point2, dated April 2024; Air Quality Assessment, reference J0830/1/F1, prepared by Air Quality Assessments Ltd, dated 26.03.2024; Biodiversity Net Gain Assessment, Issue-1.1, prepared by Arbtech, dated 22.03.2024; BREEAM Pre-Assessment-Version 1.0, Hotel and Co-Living, prepared by Ridge, dated 21.03.2024; Contamination Assessment, reference 11220G/AP/03, prepared by JPP Geotechnical & Environmental Ltd, dated 27.03.2023; Daylight, Sunlight, and Overshadowing Report-Version-V1, prepared by Point2, dated March 2024; Flood Risk Assessment and Drainage Strategy, reference 231022-EDGE-XX-XX-RP-C-0001\_Flood Risk Assessment-P02, prepared by Edge Consulting Engineers, dated 26.03.2024; Method Statement, prepared by John F Hunt Regeneration, dated 07.12.2023; Preliminary Ecological Appraisal and Preliminary Roost Assessment-Issue-2.1, prepared by Arbtech, dated 21.03.2024; Report Reference PJB9649/23358/V1.1 (Noise Impact Assessment), prepared by Spectrum Acoustic Consultants, dated 26.03.2024; Ventilation Strategy Report-Version 3.0, prepared by Ridge, dated 26.03.2024; Pedestrian Level Wind Desk-Based Assessment-Rev-B, reference RWDI #2404017, prepared by RWDI, dated 27.03.2024; SuDS Statement Addendum-Rev-A, prepared by EAS, dated 24.03.2025.

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

#### **REASON**

To ensure that the development complies with the objectives of The London Plan (2021) and the Local Plan Parts 1 (2012) and 2 (2020).

#### **4. NONSC GRC Cladding Material**

Prior to the commencement of any works on the facade or the supporting structure/substructure, detailed drawings setting out the approved GRC cladding shall be submitted to and approved in writing by the Local Planning Authority. These drawings shall include, but not be limited to:

- (i) Panel Arrangement: Detailed drawings showing the size of each GRC panel, the arrangement of panels on the facade, and the location of all joints.
- (ii) Joint Treatment and Fixing: Specifications for the treatment of joints and fixing detail to ensure they are inconspicuous and maintain the quality of appearance of the facade.
- (iii) Fabrication Method: Confirmation that the GRC panels will be prefabricated as larger elements to minimise the number of joints.
- (iv) Mock-ups and Samples: Provision of mock-ups or samples of the GRC cladding for visual inspection and approval.
- (v) Supporting Structure/Substructure: Detailed drawings and specifications of the structure/substructure supporting the GRC cladding to ensure compatibility and feasibility.
- (vi) Compliance with Standards: Evidence that the GRC cladding complies with relevant industry standards and guidelines (e.g. product data sheet or other similar).

The development shall be carried out in accordance with the approved details.

#### **REASON**

To ensure that the development presents a satisfactory appearance in accordance with Policy D3 of The London Plan (2021) and Policy DMHB 11 of the Local Plan Part 2 (2020).

#### **5. OM19 Construction Management Plan**

Prior to the commencement of development (including demolition, site clearance, and initial ground investigation works), a Construction Management Plan shall be submitted to, and approved in writing by the Local Planning Authority in consultation with Transport for London. The plan shall detail:

- (i) The phasing of development works.
- (ii) The hours during which development works will occur.
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.
- (ix) Measures to demonstrate compliance with the GLA's Control of Dust and Emissions

from Construction and Demolition SPG.

(x) Details of cranes and other tall construction equipment (including the details of obstacle lighting) in consultation with the Ministry of Defence (MoD).

The approved details shall be implemented and maintained throughout the demolition and construction process.

#### REASON

To reduce the impact on air quality during construction, protect amenity, and ensure highways safety and 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 in compliance with Policies T7, GG3, and SI 1 of The London Plan (2021), The GLA's Control of Dust and Emissions during Construction and Demolition SPG, and Policy DMAV 1 of the Local Plan Part 2 (2020).

### 6. NONSC **Cycle Parking**

Prior to the first occupation/use of the development hereby approved, at least 263 long-stay and 24 short-stay cycle parking spaces shall be installed in accordance with the approved plans and shall be made available for use. The 287 cycle parking spaces shall thereafter be permanently retained on site, maintained, and be kept available for use.

#### REASON

To ensure appropriate cycle parking provision in accordance with Policy T5 of The London Plan (2021) and Policies DMT 2 and DMT 5 of the Local Plan Part 2 (2020).

### 7. NONSC **Cycle Lift**

The external door linking the cycle lift with the pocket park shall be no less than 1.2 metres wide. The lift shall be operational upon first occupation/use and thereafter be maintained and available for use throughout the lifetime of the development.

#### REASON

To ensure appropriate space is provided to access the basement cycle parking spaces and encourage a sustainable transport modal shift in accordance with Policy T4 of The London Plan (2021).

### 8. NONSC **Residential Travel Plan**

Prior to the first occupation of the co-living development hereby approved, a full Residential Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The approved Plan shall thereafter be adhered to in perpetuity.

#### REASON

To encourage a sustainable transport modal shift in accordance with Policy T4 of The London Plan (2021).

## **9. NONSC Hotel Travel Plan**

Prior to the first use of the hotel, a full Hotel Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The approved Plan shall thereafter be adhered to in perpetuity.

### **REASON**

To encourage a sustainable transport modal shift in accordance with Policy T4 of The London Plan (2021).

## **10. NONSC Electric Vehicle Charging Points**

(i) Prior to the first occupation/use of the development hereby approved, active electric vehicle charging facilities shall be installed and made available for use at two car parking spaces. The active electric vehicle charging infrastructure shall thereafter be permanently retained on site, maintained, and be kept available for use.

(ii) Prior to the first occupation/use of the development hereby approved, passive electric vehicle charging facilities shall be installed at seven car parking spaces. The passive electric vehicle charging infrastructure shall thereafter be permanently retained on site and be available for upgrading to active electric vehicle charging.

### **REASON**

To ensure an appropriate level of onsite electric vehicle charging facilities are provided in accordance with Policy T6.1 of The London Plan (2021).

## **11. NONSC Disabled Person Parking and Lease**

(i) Prior to the first occupation/use of the development hereby approved, nine disabled person car parking spaces shall be provided in accordance with the approved plans and made available for use. The nine disabled person parking spaces shall be available for use upon first occupation/use and thereafter be permanently retained on site and be kept available for use.

(ii) All car parking spaces shall be leased and not sold.

### **REASON**

To ensure an appropriate level of onsite disabled person parking is provided and to ensure residential and hotel car parking spaces shall be leased and not sold in accordance with Policy T6.1 of The London Plan (2021).

## **12. NONSC Car Park Design and Management**

Prior to the first occupation/use of the development hereby approved, a Car Parking Design and Management Plan shall be submitted to, and approved in writing by the Local Planning Authority. The approved Plan shall be adhered to throughout the lifetime of the development.

## REASON

To ensure the site is appropriately designed and managed in accordance with Policies T6 of The London Plan (2021).

### **13. NONSC Delivery and Servicing Plan**

Prior to the first occupation/use of the development hereby approved, a Delivery and Servicing Plan shall be submitted to, and approved in writing by the Local Planning Authority. The approved Plan shall be adhered to throughout the lifetime of the development.

## REASON

To ensure appropriate delivery and servicing arrangements in compliance with Policy T7 of The London Plan (2021).

### **14. NONSC Co-living Operational Management Plan**

(i) The co-living accommodation hereby approved shall permanently be retained as Sui Generis use (not used as self-contained homes) in perpetuity.

(ii) The co-living accommodation hereby approved shall be for rent (not sale) with minimum rental tenancy lengths of no less than three months.

(ii) The co-living accommodation hereby approved shall be under single management for the lifetime of the development.

(iv) Prior to the first occupation of the co-living accommodation, a revised Operational Management Plan shall be submitted to, and approved in writing by the Local Planning Authority. The Plan shall include the management approach and services; on-site management; resident services and facilities; tenancy management; amenity management; health and safety and security measures; access arrangements; and facilities management. The approved Plan shall be adhered to upon first use and thereafter for the lifetime of the development.

## REASON

To ensure that the co-living accommodation be retained as such, be under single management, rented with a minimum tenancy of no less than three months, and be appropriately managed and maintained to ensure the long-term quality of the accommodation in accordance with Policy H16 of The London Plan (2021) and Large-Scale Purpose-Built Shared Living London Plan Guidance (2024).

### **15. NONSC Unobstructed Ground Floor Glazing**

Ground floor glazing of the development hereby approved shall be transparent glass (not obscurely glazed) and the glass shall remain free of stickers, advertising, and obscuring above one metre from finished floor levels, nor shall products/shelves/visual obstruction be placed on glazing one metre above finished floor levels, unless otherwise agreed in writing

by the Local Planning Authority.

#### REASON

To manage the transparency of ground floor windows and ensure appropriate natural surveillance of public streets and the central public park to deliver a safe and secure environment in accordance with Policies D3, D8, and D11 of The London Plan (2021) and Policies DMHB 12 and DMHB 15 of the Local Plan Part 2 (2020).

### **16. NONSC Public Realm Management and Maintenance**

Prior to first occupation/use of the development hereby approved, a public realm management and maintenance plan shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter, the approved details shall be adhered to in perpetuity.

#### REASON

To ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access, provides a safe and secure environment, and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter, Policies D3, D8, and D11 of The London Plan (2021), and Policies DMHB 12 and DMHB 15 of the Local Plan Part 2 (2020).

### **17. NONSC Landscape Management Plan**

Prior to first occupation/use of the development hereby approved, a Landscape Management Plan for a minimum period of five years from the implementation of final planting, shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter, the development shall be managed and maintained strictly in accordance with the approved details.

#### REASON

To ensure landscaping and urban greening measures are appropriately maintained in accordance with Policy G5 of The London Plan (2021) and Policies DMHB 12 and DMHB 14 of the Local Plan Part 2 (2020).

### **18. NONSC Planting**

(i) Prior to the commencement of landscaping works, details of soil depth volume shall be submitted to and approved by the Local Planning Authority. The approved details shall be delivered during the implementation of landscaping works and thereafter shall be retained in perpetuity.

(ii) All planting, seeding, and turfing in the approved landscaping scheme shall be implemented in the nearest planting season (1 October to 28 February inclusive) following first occupation/use of the approved development. The new planting and landscape operations shall comply with the requirements specified in BS3998:2010 - 'British Standard Recommendations for Tree Work'. Thereafter, areas of amenity space shall be permanently



retained and any trees or other planting which die within a period of five years from the completion of development, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species in accordance with the details approved by the Local Planning Authority.

#### REASON

To ensure that the proposed development makes a satisfactory contribution to the enhancement of the visual amenities of the locality in accordance with Policies G5 and G7 of The London Plan (2021) and Policies DMHB 11, DMHB 12, and DMHB 14 of the Local Plan Part 2 (2020).

### 19. NONSC **Urban Greening Factor**

(a) Approved Urban Greening Factor and landscaping measures (5903-OOB-ZZ-00-D-L-000071-Rev-P05) to achieve a minimum Urban Greening Factor score of 0.36 shall be implemented in the nearest planting season (1 October to 28 February inclusive) following first occupation/use of the approved development at the latest.

(b) Within six months of implementation of Urban Greening Factor measures, details of onsite green infrastructure shall be submitted to, and approved in writing by the Local Planning Authority to verify the UGF score of 0.36 has been attained.

The approved Urban Greening Factor measures to achieve a score of 0.36 shall permanently be maintained as such thereafter.

#### REASON

To ensure appropriate levels of high-quality landscaping and urban greening measures are provided in accordance with Policy G5 of The London Plan (2021).

### 20. NONSC **Ecology**

Within three months of first occupation/use of the development, photographic evidence and a post-development ecological field survey and assessment shall be submitted to, and approved in writing by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the Preliminary Ecological Appraisal and Preliminary Roost Assessment, Issue-2.1, prepared by Arbtech, dated 21.03.2024. Development shall accord with the approved details and retained for the lifetime of the development.

#### REASON

To ensure the development delivers appropriate habitats for biodiversity in accordance with Policies G1, G5, and G6, and of The London Plan (2021).

### 21. NONSC **Biodiversity**

(i) Approved Biodiversity Net Gain measures (Biodiversity Net Gain Assessment, Issue-1.1,

prepared by Arbtech, dated 22.03.2024 and 5903-OOB-ZZ-00-D-L-000040-Rev-P04) shall be implemented in the nearest planting season (1 October to 28 February inclusive) following the first occupation/use of the approved development.

(ii) Prior to the first occupation/use of the development hereby permitted, a 30-year site Habitat Management Plan (HMP) shall be submitted to, and approved in writing by the Local Planning Authority. The HMP shall include:

- (a) Description and evaluation of the features to be managed;
- (b) Aims, objectives, and targets for management;
- (c) Description of the management operations necessary to achieving aims and objectives;
- (d) Prescriptions for management actions;
- (e) Preparation of a works schedule, including annual works schedule;
- (f) Details of the monitoring needed to measure the effectiveness of management;
- (g) Details of the timetable for each element of the monitoring programme; and
- (h) Details of the persons responsible for the implementation and monitoring.

The approved HMP shall be strictly adhered to, and development shall commence and operate in accordance with it.

(iii) The Applicant shall report the state of the Biodiversity Net Gain requirements of the development to the Council in years one (post-completion), three, five, ten, 20 and 30, with biodiversity reconciliation calculations at each stage.

#### REASON

To ensure the development delivers onsite biodiversity net gain and secures the protection and effective management of on-site habitat in accordance with Policy G6 of The London Plan (2021), Policy EM7 of the Local Plan Part 1 (2012), and Policies DME1 7 and DMHB 14 of the Local Plan Part 2 (2020).

## **22. NONSC External Lighting**

Prior to the first occupation/use of the development hereby approved, details of external lighting shall be submitted to, and approved in writing by the Local Planning Authority. Details shall include location, height, type, and direction of light sources and intensity of illumination and shall include measures to prevent glare and sky glow by correctly using, locating, aiming, and shielding luminaires and consider Guidance Note GN08/23 Bats and Artificial Lighting at Night (Institution of Lighting Professionals, 2023). The approved details shall be installed prior to the first occupation/use of the development and thereafter permanently maintained and retained.

#### REASON

To minimise intrusive lighting and reduce light pollution ensure legibility, promote safe routes and wayfinding between the development and local amenities, and contribute to the appearance of the area and ease of movement through the space in accordance with Policies D3 and D8 of The London Plan (2021) and DMHB 12 of the Local Plan Part 2

(2020).

### **23. NONSC Free Water Drinking Water**

The development hereby approved shall include the provision of at least one free drinking water fountain within the new public square. The water fountain shall be installed and operational upon first occupation/use and thereafter maintained and retained in perpetuity.

#### **REASON**

To ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm in accordance with Policy D8 of The London Plan (2021).

### **24. NONSC Public Realm Seating and Art**

Prior to the first occupation/use of the development hereby approved, details of public realm seating and Public Art (indicatively illustrated on drawing reference 5903-OOB-XX-XX-RP-L-0005-Rev-P01 and 5903-OOB-XX-XX-RP-L-5300-Rev-P03) shall be submitted to, and approved in writing by the Local Planning Authority. The approved public realm seating and Public Art shall be installed prior to the first occupation/use and thereafter permanently maintained and retained.

#### **REASON**

To ensure the public realm is well-designed, attractive, and related to the local and historical context in accordance with Policy D8 of The London Plan (2021).

### **25. NONSC Wind Mitigation**

Prior to the first occupation/use of the development hereby approved, wind mitigation measures detailed in the Pedestrian Level Wind Desk-Based Assessment (Rev-B, reference RWDI #2404017, prepared by RWDI, dated 27.03.2024, shall be implemented and thereafter be maintained and functional and permanently retained for the lifetime of the development.

#### **REASON**

To prevent adverse impact on wind microclimate, in accordance with Policy D9 of the London Plan (2021).

### **26. NONSC Secured by Design Accreditation**

The development hereby approved shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No part of the development hereby approved shall be occupied/used until accreditation has been achieved. Thereafter, the development shall be implemented and maintained in accordance with the details submitted to achieve 'Secured by Design' accreditation.

## REASON

To ensure the development provides a safe and secure environment in accordance with Policies D3 and D11 of The London Plan (2021) and Policy DMHB 15 of the Local Plan Part 2 (2020).

### **27. NONSC Safety, Security, and Resilience**

Prior to the commencement of development (excluding demolition, site clearance, and initial ground investigation works), the following shall be submitted to, and approved in writing by the Local Planning Authority in consultation with the Met Police:

(a) A Counter Terrorism Risk Assessment and Operational Requirement to include details of:

- (i) external laminate glazing
- (ii) access control system for the co-living accommodation and hotel
- (iii) co-living accommodation and hotel dynamic lockdown system
- (iv) detection and verification system
- (v) post and delivery location and design and development security measures

(b) A Vehicle Dynamics Assessment (VDA) and hostile vehicle mitigation (HVM) measures.

The applicant shall install approved measures prior to first occupation/use of the development and such measures shall thereafter be maintained and retained in perpetuity.

## REASON

To maximise building resilience and minimise potential physical risks in accordance with Policy D11 of The London Plan (2021) and Policy DMHB 15 of the Local Plan Part 2 (2020).

### **28. NONSC Fire Statement**

Prior to any above ground works (excluding demolition, site clearance, and initial ground investigation works) for the development hereby approved, a revised Fire Statement shall be submitted to, and approved in writing by, the Local Planning Authority. The statement shall include details of the dedicated evacuation lifts (with a protected lobby) and additional firefighting lifts, and an outline management plan (including how the evacuation lifts will be operated) and outline evacuation strategy (including details of alarm and detection arrangements and how the development would enable the safe and dignified emergency evacuation for all building users, such as people with a range of disabilities). Thereafter, the development shall be carried out and maintained in full accordance with the approved details.

## REASON

To ensure the safety of all building users in accordance with Policy D5 and D12 of The London Plan (2021).

### **29. NONSC Accessibility**

(i) Ten percent of the co-living units (32 units) shall be wheelchair-accessible, designed in accordance with Part M of the building regulations, and approved by an inclusive accessibility expert. The 32 wheelchair-accessible co-living units shall thereafter be retained in perpetuity.

(ii) Fifteen percent of the hotel bedrooms (24 hotel bedrooms) shall be accessible (or convertible in the future should demand arise) in accordance with the requirements of '19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice'.

(iii) Prior to the first use of the hotel hereby approved, a hotel Accessibility Management Plan shall be submitted to, and approved in writing by the Local Planning Authority outlining amongst other matters 'soft' measures (such as management, alarms, etc.) which may not be able to be addressed through design. The approved measures shall thereafter be adhered to throughout the life of the development.

(iv) Prior to first occupation/use of the development hereby approved, accessibility details, including drawings, to demonstrate that the wider site, including the public realm, external amenity, entrances, etc., are appropriately designed for disabled people and people with protected characteristics shall be submitted to, and approved in writing by the Local Planning Authority. Approved details shall be implemented prior to first occupation/use of the development and thereafter permanently retained as such.

#### REASON

To ensure appropriate levels of wheelchair accessible accommodation in accordance with Policies D5 and E10 of The London Plan (2021) and the Large-Scale Purpose-Built Shared Living London Plan Guidance (2024), Policy DME 6 of the Local Plan Part 2, and Accessible Hillingdon SPD.

### **30. NONSC Whole Life-Cycle Carbon Assessment**

(i) Prior to the commencement of development (excluding demolition, site clearance, and initial ground investigation works), a revised Whole Life-Cycle Carbon Assessment shall be submitted to, and approved in writing by the Local Planning Authority. The approved details shall thereafter be adhered to in perpetuity.

(ii) Prior to the first occupation/use of the development hereby approved, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template shall be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. Together with any supporting information, it shall be submitted to, and approved in writing by the Local Planning Authority. The approved details shall thereafter be adhered to in perpetuity.

#### REASON

In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policy SI 2 of The London Plan (2021).

### **31. NONSC Circular Economy**

(i) Prior to the commencement of development (excluding demolition, site clearance, and initial ground investigation works), a revised Circular Economy Statement shall be submitted to, and approved in writing by the Local Planning Authority. The approved details shall thereafter be adhered to in perpetuity.

(ii) Prior to the commencement of development (excluding demolition, site clearance, and initial ground investigation works), a Pre-Redevelopment Audit and an Operational Waste Management Plan shall be submitted to, and approved in writing by the Local Planning Authority. The approved details shall thereafter be adhered to in perpetuity.

(iii) Prior to the first occupation/use of the development hereby approved, a post-construction monitoring report shall be completed in line with the GLA's Circular Economy Statement Guidance and submitted to, and approved in writing by the Local Planning Authority. The approved details shall thereafter be adhered to in perpetuity.

#### **REASON**

To maximise the re-use of materials and in the interests of sustainable waste management in accordance with Policy SI 7 of The London Plan (2021).

### **32. NONSC District Heating Network Connection**

Prior to the above-ground commencement of construction works, details regarding the future connection to the District Heating Network (DHN) shall be submitted to and approved in writing by the local planning authority.

Details shall include:

(i) Further detail of how the developer will ensure the performance of the DHN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning.

(ii) Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020), taking account of diversification.

(iii) Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion.

(iv) A before and after floor plan showing how the plant room can accommodate a heat substation for future DHN connection. The heat substation shall be sized to meet the site's peak heat load. The drawings shall cover details of the phasing, including any plant that must be removed or relocated and access routes for installation of the heat substation.

(v) Details of the route for the primary pipework from the energy centre to the point of connection at the site boundary, including evidence that the point of connection is accessible by the area-wide DHN, detailed proposals for installation for the route that shall be coordinated with existing services, and plans and sections showing the route for three

100mm diameter communications ducts.

(vi) Details of the location for building entry, including dimensions, isolation points, coordination with existing services, and flushing/seals details.

(vii) Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DHN supply, including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue.

(viii) Details of a future pipework route from the temporary boiler location to the plant room.

## REASON

To ensure the development reduces its impact on climate change in compliance with Policies SI2 and SI3 of The London Plan (2021), Policy EM1 of the Local Plan Part 1, and Policies DMEI 2 and DMEI 3 of the Local Plan Part 2.

### **33. NONSC Energy Strategy**

(a) Prior to first occupation/use of the development hereby approved, the development shall incorporate measures to achieve an overall reduction in regulated CO<sub>2</sub> emissions of at least 36 percent (equal to 45.8 tonnes of CO<sub>2</sub> per year) beyond Building Regulations Part L 2013. These CO<sub>2</sub> savings shall be achieved through the Lean, Clean, Green Energy Hierarchy as detailed in the approved Energy Strategy Report-Version 5, reference 5023602-RDG-XX-XX-RP-ME-510000, prepared by Ridge, dated 28.09.2024, including:

(i) Lean - passive design measures to achieve an annual reduction of at least 15 percent equating to at least 19.5 in regulated carbon dioxide (CO<sub>2</sub>) emissions over BR Part L 2013 for the non-residential development.

(ii) Green - renewable energy equipment including the incorporation of a photovoltaic array with a capacity of at least 65.2 kWp, and Air Source Heat Pumps to achieve an annual reduction of at least 20 percent, equating to 26.3 tonnes, in regulated carbon dioxide (CO<sub>2</sub>) emissions over Part L 2013.

(iii) Seen - heat and electric meters installed to monitor the performance of the PV and the carbon efficiency (COP) of the heat pumps, including the heat generation and the combined parasitic loads of the heat pumps.

(b) On completion of the installation of the low and zero-carbon equipment, copies of the MCS certificates and all relevant commissioning documentation shall be submitted to the Council.

(c) Within three months of first occupation/use of the co-living development, the relevant Energy Performance Certificate (EPC) and detailed SAP Worksheets showing clearly the TER and DER, and/or the Display Energy Certificates (DECs), accompanying Advisory Reports and detailed BRUKL modelling output reports showing clearly the TER and BER from the 'as built stage' following completion of the development, shall be submitted to, and approved by, the Local Authority to confirm compliance with the energy efficiency measures detailed in the approved Energy Strategy.

The development shall be carried out strictly in accordance with the approved details, and the approved measures shall be maintained in perpetuity.

#### REASON

In the interest of addressing climate change and to secure environmentally sustainable development in accordance with Policies SI2 and SI3 of The London Plan (2021).

#### **34. NONSC BREEAM**

(a) Prior to first occupation/use of the development hereby approved, the development shall be registered with the Building Research Establishment (BRE) and achieve a BREEAM Rating 'Excellent', with a score of at least 78.45 percent for the co-living amenity block and 75.25 percent for the combined co-living and hotel amenity block based on the latest BREEAM NC Technical guidance).

(b) Within three months of first occupation/use, a BREEAM 'Post Construction Stage' Assessment and related certification, verified by the BRE, shall be submitted to, and approved in writing by the Local Planning Authority to confirm the stated standard has been achieved.

(c) The approved measures to achieve the BREEAM 'Excellent' standard shall be retained in working order in perpetuity.

#### REASON

In the interest of addressing climate change and to secure environmentally sustainable development in accordance with Policies SI2 and SI3 of The London Plan (2021).

#### **35. NONSC Overheating and Cooling**

Prior to the first occupation/use of the development hereby approved, the development shall incorporate cooling measures in accordance with the relevant TM52 and TM59 guidance and as detailed in the TM52 Overheating Risk Assessment Report (Coliving and Hotel), prepared by Ridge, dated 28.10.24, and the Energy Strategy Report (V5, reference 5023602-RDG-XX-XX-RP-ME-510000, prepared by Ridge, dated 28.09.2024).

#### REASON

To reduce the potential for internal overheating and reliance on air conditioning systems in accordance with Policies D6 and Policy SI 4 of The London Plan (2021).

#### **36. NONSC Non-Road Mobile Machinery**

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during demolition, site preparation, and construction shall comply with the emission standards set out in Chapter 7 of the GLA's supplementary planning guidance 'Control of Dust and Emissions During Construction and Demolition' dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no



NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the Local Planning Authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

#### REASON

To ensure compliance with Policy SI 1 and GG3 of The London Plan (2021), London's Low Emission Zone for non-road mobile machinery, the Mayor of London, London Local Air Quality Management Policy Guidance (2019), and The GLA's Control of Dust and Emissions during Construction and Demolition SPG.

### **37. NONSC Photovoltaic Panels**

The Photovoltaic Panels shall be installed and operational prior to first occupation/use of the development hereby approved, and thereafter shall be maintained in good working order in accordance with the manufacturer's instructions and cleaned at least annually unless self-cleaning panels are installed.

#### REASON

To ensure that the installed Photovoltaic Panels generate renewable energy at their full potential in accordance with Policy SI 2 of The London Plan (2021).

### **38. NONSC Water Efficiency**

The development hereby approved shall minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption), achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development), and incorporate measures such as smart metering, water saving, and recycling measures, including retrofitting.

#### REASON

To help to achieve lower water consumption rates and to maximise futureproofing in accordance with Policy SI 5 of The London Plan (2021).

### **39. NONSC Noise Impacts on the Development**

For the lifetime of the development hereby permitted the noise level shall not exceed 35 dB LAeq 16 hrs between 0700 and 2300 and 30 dB LAeq 8 hrs, between 2300 and 0700, measured inside any room of any permitted co-living accommodation whilst achieving acceptable internal living conditions with respect to ventilation and temperature.

#### REASON

To protect the residential amenity of co-living occupants in accordance with Policies D3, D13, and D14 of The London Plan (2021), Policy EM8 of the Local Plan Part 1 (2012), and

Policy DMHB 11 of the Local Plan Part 2 (2020) and regarding the guidance set out in 'Guidance on Sound Insulation and Noise Reduction for Buildings' British Standard Institution BS8233: 2014.'

#### **40. NONSC Noise Impacts on Surrounds**

For the lifetime of the development hereby permitted the rating level (LAr) of noise caused by its operation shall not exceed:

40 dB LAr 15 min for any fifteen-minute period between 2300 and 0700, and 50 dB LAr 1 hour for any one-hour period between 0700 and 2300, determined one metre free field external to any window or door of any permanent residential, or equivalently noise sensitive premises, in accordance with 'Methods for rating and assessing industrial and commercial sound' British Standards Institution BS4142 2014.'

#### **REASON**

To protect the residential amenity of neighbouring occupants with windows open for the purposes of ventilation and cooling in accordance with Policies D3, D13, and D14 of The London Plan (2021), Policy EM8 of the Local Plan Part 1 (2012), and Policy DMHB 11 of the Local Plan Part 2 (2020).

#### **41. NONSC Anti-Vibration Mounts**

Prior to first occupation/use of the development hereby approved, anti-vibration measures shall be installed to ensure that machinery, plant/equipment, extract/ventilation systems and ducting are mounted with proprietary anti-vibration isolators and fan motors are vibration isolated from the casing and adequately silenced. The anti-vibration measures shall permanently be retained thereafter.

#### **REASON**

To protect the residential amenity in accordance with Policies D3, D13, and D14 of The London Plan (2021), Policy EM8 of the Local Plan Part 1 (2012), and Policy DMHB 11 of the Local Plan Part 2 (2020).

#### **42. NONSC Extraction and Odour Control**

Prior to first occupation/use of the development hereby approved, details of the installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet without cowl at least one metre above the eaves of the main building shall be submitted to, and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to the first use of kitchen facilities and thereafter shall permanently be retained.

#### **REASON**

To protect residential amenity from potential noise and odour harm in accordance with Policy D13 of The London Plan (2021) and Policies DMHB 11 and DMTC 4 of the Local Plan Part 2

(2020).

#### **43. NONSC Hours of Use (retail)**

The retail units hereby approved shall not be used except between 0700 hours and 2200 hours Mondays to Saturdays and 0900 hours to 1800 hours on Sundays and Bank Holidays.

#### **REASON**

To protect the residential amenity of the occupiers of nearby residential properties in accordance with Policies D3, SD7, D13, and D14 of The London Plan (2021) and Policy DMHB 11 of the Local Plan Part 2 (2020).

#### **44. NONSC Land Contamination**

(i) Prior to the commencement of development hereby approved (excluding demolition, site clearance, and initial ground investigation works), a scheme to deal with unacceptable contamination, (including asbestos materials detected within the soil), shall have been submitted to, and approved in writing by the Local Planning Authority (LPA). All works which form part of any required remediation scheme shall be completed before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A desk-top study carried out by a suitably qualified and accredited consultant/contractor to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site:

(b) A site investigation, including where relevant soil, soil gas, surface water and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report shall also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to the commencement development (excluding demolition, site clearance, and initial ground investigation works), 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 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 and/or engineering 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 factual results and interpretive reports of this testing shall be submitted to and approved in writing by the LPA.

#### REASON

To ensure that risks from land contamination are minimised and that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite receptors in accordance with Policies DMEI 11 and DMEI 12 of the Local Plan Part 2 (2020).

#### **45. NONSC Co-Living Use**

The co-living development hereby approved shall be used as a co-living scheme only and for no other purpose or any use cited in any provision of the Town and Country Planning (General Permitted Development) Order 2015 (As Amended) (or any subsequent order revoking and re-enacting that Order with or without modifications) relevant to uses falling within Use Class Sui Generis.

Co-living amenity spaces (co-work, gym, cinema, laundry, flexible space, roof terrace) shall only be used by residents and their guests unless otherwise agreed in writing by the Local Planning Authority.

#### REASON

To ensure that the Council manages the quality, impacts, and provision of any change of use thereby safeguarding amenities of the occupants, occupiers of neighbouring properties, and transport capacity in accordance with Policies GG2, D14, T4, and T7 of The London Plan (2021).

#### **46. NONSC Hotel Use**

The hotel hereby approved shall be used solely as a hotel and associated ancillary uses (Use Class C1) and shall not be used as separate residential units or for any other purpose. No hotel bedroom shall be rented to an individual for a period of more than 90 days per calendar year. Prior to the first use of the hotel, a management plan detailing the booking system shall be submitted to, and approved in writing by the Local Planning Authority. The plan shall include:

- (i) the maximum permitted stay; and
- (ii) a system for keeping a register of customer bookings and a means by which the Local Planning Authority can check the register to ensure that the maximum permitted stays are

enforced.

The hotel shall be operated in accordance with the approved management plan in perpetuity.

#### REASON

To ensure the hotel is used as proposed and not incorporated into the co-living accommodation or used for residential purposes, in accordance with Policies E10 and D6 of The London Plan (2021) and Policies DME 5 and DMHB 16 of the Local Plan Part 2 (2020).

#### **47. NONSC Co-Living Facilities**

The shared co-living facilities hereby approved, including the gymnasium, laundry, cinema room, co-work space, ground-floor amenity space, shall be for use by the residents of the co-living development and their guests only. These facilities shall be available for use on first occupation of the co-living development and thereafter permanently retained as such.

#### REASON

To ensure appropriate communal amenity facilities and services for co-living residents and to avoid parking and highways impacts in compliance with Policy H16 of The London Plan (2021), Policies DMT 1 and DMT 2 of the Local Plan Part 2 (2020), and the Large-Scale Purpose-Built Shared Living London Plan Guidance (2024).

#### **48. NONSC Bird Hazard Management Plan**

Prior to the commencement of development, a Bird Hazard Management Plan (BHMP) shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Ministry of Defence (MoD).

The Bird Hazard Management Plan shall contain, but not be limited to:

- a. An assessment of the various bird species found in the vicinity of the site, to include species data and numbers;
- b. Details of layout of the solar panels, and roof proofing measures designed to prevent access to, and successful breeding by, large gulls on the roof spaces and on, under or around the PV panels;
- c. Schedule for inspection of the roof spaces by a suitably qualified individual (to include details of roof access), details of the methods used to disturb/disperse birds, and a method statement for recording the results of the disturbance/dispersal activity; and
- d. Details of the waste management, specifically the disposal of food waste, within the open green spaces and on the living rooftop terrace.

The development shall be carried out and managed strictly per the approved details, and there shall be no variation without the express written consent of the Local Planning Authority in consultation with the MoD.

#### REASON

To limit the site's potential to attract and support populations of bird species that may cause detriment to aviation safety in accordance with the requirements of Policy DMAV 1 of the Local Plan Part 2 (2020).

#### **49. NONSC Basement Monitoring**

The condition of nearby buildings shall be monitored throughout the construction process and works shall cease immediately if impacts exceed those detailed in the Basement Structural Impact Assessment, reference 231022-EDGE-XX-XX-RP-S-0001\_ Basement Structural Impact Assessment-P01, prepared by Edge Consulting Engineers, dated 02.05.2024.

A post-completion condition survey (carried out by a suitably qualified structural engineer) of the approved development and nearby buildings shall be submitted to and approved in writing by the local planning authority within six months of completion.

#### REASON

To ensure the development does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability in accordance with Policy D10 of The London Plan (2021) and Policy DMHD 3 of the Local Plan Part 2 (2020).

#### **50. NONSC Restriction PD Boundary Treatment**

Notwithstanding the provisions of Class A of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any subsequent order revoking and re-enacting that Order with or without modifications), no other gate, fence, wall or means of enclosure shall be installed or constructed other than those illustrated on approved drawings.

#### REASON

To ensure the pedestrian passageways and pocket park remain publicly accessible in accordance with Policies D8, GG3, and T2 of The London Plan (2021) and Policy DMHB 12 of the Local Plan Part 2 (2020).

#### **51. NONSC Digital Connectivity Infrastructure**

Prior to first occupation/use of the development hereby approved, sufficient ducting space for full fibre connectivity infrastructure shall be provided to all end users within the development, unless an affordable alternative 1GB/s-capable connection is made available to all end users. Thereafter, the Digital Connectivity Infrastructure shall be retained in perpetuity.

#### REASON

To ensure appropriate Digital Connectivity Infrastructure would be installed in accordance with Policy SI 6 of The London Plan (2021).

## 52. NONSC Sustainable Urban Drainage

Prior to the commencement of development hereby approved (except for demolition, ground and enabling work), a scheme for the provision of sustainable water management shall be submitted to and approved in writing by the Local Planning Authority in consultation with the relevant stakeholders. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on-site by providing information on:

### (a) Sustainable Drainage features:

- (i) Surface water discharge - the submitted drainage strategy shall identify the proposed method and location of discharging collected surface water from the whole site area in accordance with the hierarchy detailed in Policy SI 13 of The London Plan (2021). Where the proposal does not utilise the most sustainable solution, justification shall be provided.
- (ii) Sustainable Drainage System (SuDS) - the submitted drainage strategy shall incorporate SuDS elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality, and amenity benefits.
- (iii) Runoff rates - provide the greenfield and proposed runoff rates for a variety of return periods, including one in one year, one in 30, one in 100, and one in 100 plus 40 percent climate change. The development shall aim to meet greenfield runoff rates unless a suitable justification can be provided and shall not exceed 13 l/s.
- (iv) Drainage calculations - include calculations to demonstrate that the volume of storage and size of drainage features provided is appropriate to control surface water for a range of storm duration and rainfall intensities for the entire site area for events up to and including the critical one in 100 plus 40 percent climate change rainfall event.
- (v) Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the one in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding shall be mapped, and the depth of the flooding shall be confirmed. Safe access and egress for the site shall be demonstrated.

### (b) Long-term management and maintenance of the drainage system.

- (i) Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all the drainage network above and below ground and identifies the responsibility of different parties for each component of the drainage network.
- (ii) Include details of the necessary inspection regimes and maintenance frequencies.

(c) No building hereby permitted shall be occupied until evidence (photographs and installation contracts) is submitted to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all the proposed drainage components.

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

#### REASON

To ensure that surface water run off is controlled and the development does not increase flood risk, in compliance with the National Planning Policy Framework (2024), Planning Practice Guidance (Flood Risk and Coastal Change (2014), Policies SI 12 and SI 13 of The London Plan (2021), Policy EM6 of the Hillingdon Local Plan Part 1 (2012), and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020).

#### **53. NONSC Phase 2 Bat Survey**

Prior to the commencement of development (including demolition, site clearance, and initial ground investigation works) a Phase 2 Bat Survey shall be undertaken between May and September and details shall be submitted to and approved by the Local Planning Authority. If bats are found to be present onsite, bat mitigation details shall be submitted to and approved by the Local Planning Authority prior to the commencement of development (including demolition, site clearance, and initial ground investigation works). Approved mitigation measures shall be implemented during the demolition/construction programme and permanently retained thereafter.

#### REASON

To protect bats and ensure any harm is appropriately mitigated in accordance with Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020).

#### **54. NONSC Detailed CLP**

Prior to the commencement of development (including demolition, site clearance, and initial ground investigation works) a Detailed Construction Logistics Plan (CLP) shall be submitted to and approved by the Local Planning Authority. The approved CLP shall be implemented and monitored throughout the demolition and construction programme.

#### REASON

To protect amenity and ensure highways safety in compliance with Policy T7 of The London Plan (2021).

#### **55. NONSC Co-Living Studios and Hotel Rooms**

The Co-Living development hereby approved shall contain 320 studios and the hotel hereby approved shall contain 162 hotel guest bedrooms in accordance with the approved plans. Co-Living studios or hotel guest bedrooms shall not be subdivided and no additional Co-Living studios or hotel guest bedrooms shall be created without the prior written approval from the Local Planning Authority.

#### REASON

To ensure no additional Co-Living studios or hotel guest bedrooms are created without



appropriate planning assessment in accordance with Policies E10, H16, and D6 of The London Plan (2021), Large-Scale Purpose-Built Shared Living London Plan Guidance (2024), and Policies DME 5 and DMHB 16 of the Local Plan Part 2 (2020).

## **56. NONSC Retail Fit-Out**

Prior to the commencement of retail unit development (excluding demolition, site clearance, and initial ground investigation works), details of retail unit/s fit-out shall be submitted to and approved by the Local Planning Authority. Approved details shall be implemented during construction, fitted-out retail units shall be available for use prior to first occupation/use of the hotel and Co-Living development hereby approved, and the approved fit-out shall thereafter be retained in perpetuity.

### **REASON**

To support the of town centres' vitality in accordance with Policies E9 and SD6 of The London Plan (2021) and Policies DMTC 1 and DMTC 2 of the Local Plan Part 2 (2020).

## **Informatives**

### **1. I52 Compulsory Informative (1)**

The decision to GRANT 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. I15 Control of Environmental Nuisance from Construction Work**

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance 'The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit ([www.hillingdon.gov.uk/noise](http://www.hillingdon.gov.uk/noise) Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

**3. I43 Keeping Highways and Pavements free from mud etc**

You are advised that care should be taken during the building works hereby approved to avoid spillage of mud, soil, or related building materials onto the pavement or public highway. You are further advised that failure to take appropriate steps to avoid spillage or adequately clear it away could result in action being taken under the Highways Act 1980.

**4. I70 LBH worked applicant in a positive & proactive (Granting)**

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 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.

**5.**

It is considered that a condition based on fixed noise levels is consistent with noise and planning policy by relating external noise levels to the point at which adverse effects on health and quality of life start to be observed. The limit values are intended to be consistent with the evidence base that formed the bases for the guidelines published by the WHO in 1999 and 2009 the former being reflected in guidance: 'Guidance on Sound Insulation and Noise Reduction for Buildings' BS8233 2014. This is combined with the assessment principles and procedures detailed in guidance: 'Methods for rating and assessing industrial and commercial sound' British Standards Institution BS4142 2014.' This is used to set reference time periods for the assessment and adjust measured or calculated LAeq values for character as detailed in BS4142.

**6.**

The demolition of the existing buildings and the construction of the permitted development has the potential to disturb occupiers of nearby premises. The Council would, if necessary, use its powers under Section 60 of the Control of Pollution Act 1974, with reference to BS5228 parts 1 and 2, to avoid significant noise and vibration effects on occupiers of those premises.

## 153 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020), including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMAV 1	Safe Operation of Airports
DMCI 2	New Community Infrastructure
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
DME 5	Hotels and Visitor Accommodation
DME 6	Accessible Hotels and Visitor Accommodation
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 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 13	Shopfronts
DMHB 13A	Advertisements and Shop Signage
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 19	Play Space
DMHB 2	Listed Buildings
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHD 3	Basement Development
DMIN 4	Re-use and Recycling of Aggregates
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
DMTC 2	Primary and Secondary Shopping Areas
LPP D1	(2021) London's form, character and capacity for growth
LPP D10	(2021) Basement development
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 E10	(2021) Visitor infrastructure
LPP E11	(2021) Skills and opportunities for all
LPP E2	(2021) Providing suitable business space
LPP E9	(2021) Retail, markets and hot food takeaways
LPP G1	(2021) Green infrastructure
LPP G4	(2021) Open space
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 GG3	(2021) Creating a healthy city
LPP GG4	(2021) Delivering the homes Londoners needs
LPP GG5	(2021) Growing a good economy
LPP GG6	(2021) Increasing efficiency and resilience
LPP H1	(2021) Increasing housing supply
LPP H10	(2021) Housing size mix
LPP H16	(2021) Large-scale purpose-built shared living
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP HC1	(2021) Heritage conservation and growth
LPP S4	(2021) Play and informal recreation
LPP S6	(2021) Public toilets
LPP SD6	(2021) Town centres and high streets
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP SD8	(2021) Town centre network
LPP SD9	(2021) Town centres: Local partnerships and implementation
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
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 T1	(2021) Strategic approach to transport
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 T6.3	(2021) Retail parking
LPP T6.4	(2021) Hotel and leisure use 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
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF14 -24	NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF6 -24	NPPF6 2024 - Building a strong, competitive economy
NPPF7 -24	NPPF7 2024 - Ensuring the vitality of town centres
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport

**Appendix 2: Relevant Planning History**

### **Appendix 3: List of Relevant Planning Policies**

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

#### Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.E4	(2012) Uxbridge
PT1.E5	(2012) Town and Local Centres
PT1.E7	(2012) Raising Skills
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM5	(2012) Sport and Leisure
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.EM11	(2012) Sustainable Waste Management
PT1.CI1	(2012) Community Infrastructure Provision
PT1.H1	(2012) Housing Growth
PT1.H2	(2012) Affordable Housing
PT1.HE1	(2012) Heritage

#### Part 2 Policies:

NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF6 -24	NPPF6 2024 - Building a strong, competitive economy



NPPF7 -24	NPPF7 2024 - Ensuring the vitality of town centres
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF14 -24	NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
DME 5	Hotels and Visitor Accommodation
DME 6	Accessible Hotels and Visitor Accommodation
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
DMTC 2	Primary and Secondary Shopping Areas
DMAV 1	Safe Operation of Airports
DMCI 2	New Community Infrastructure
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 2	Reducing Carbon Emissions

DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMIN 4	Re-use and Recycling of Aggregates
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 2	Listed Buildings
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 13	Shopfronts
DMHB 13A	Advertisements and Shop Signage
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 19	Play Space
DMHD 3	Basement Development
LPP D1	(2021) London's form, character and capacity for growth
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 D10	(2021) Basement development
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 E2	(2021) Providing suitable business space
LPP E9	(2021) Retail, markets and hot food takeaways
LPP E10	(2021) Visitor infrastructure
LPP E11	(2021) Skills and opportunities for all
LPP HC1	(2021) Heritage conservation and growth
LPP G1	(2021) Green infrastructure
LPP G4	(2021) Open space
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 GG5	(2021) Growing a good economy
LPP GG6	(2021) Increasing efficiency and resilience
LPP SD6	(2021) Town centres and high streets
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP SD8	(2021) Town centre network
LPP SD9	(2021) Town centres: Local partnerships and implementation
LPP GG3	(2021) Creating a healthy city
LPP GG4	(2021) Delivering the homes Londoners needs
LPP H1	(2021) Increasing housing supply
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP H10	(2021) Housing size mix
LPP H16	(2021) Large-scale purpose-built shared living
LPP S4	(2021) Play and informal recreation
LPP S6	(2021) Public toilets
LPP SI1	(2021) Improving air quality
LPP SI2	(2021) Minimising greenhouse gas emissions
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 SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP T1	(2021) Strategic approach to transport
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 T6.3	(2021) Retail parking
LPP T6.4	(2021) Hotel and leisure use 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
LPP DF1	(2021) Delivery of the Plan and Planning Obligations