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18 December 2017

Development & Projects (PP18)
Greater London Authority
City Hall
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London
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Dear Sir/Madam,
Request for Pre-Application Advice
Redevelopment of Land at Harefield Road, Uxbridge
London Borough of Hillingdon

Introduction

I am writing to request pre-application advice relating to the redevelopment of land at Harefield Road, Uxbridge, to provide new residential apartments. The residential apartments are proposed to be build to rent (BTR) apartments and are intended to be operated by Five Nine Living, a specialist management company, which is part of the Watkin Jones Group.

The purpose of this letter is to provide the Authority with details of the development proposals to enable pre-application advice to be provided.

The development proposes:

'Demolition of existing buildings including clearance of site, and development of 304 apartments with ground floor retail floorspace (Class A1) along with associated landscaping, car parking and other associated works'.

To assist with this request, the following information is provided at this stage:

- **Completed Online 'Request for Pre-Application Advice Form';**
- Pre-Application Design and Access Statement prepared by CJCT describing the context of the site and explaining the reasons for the design and form of the proposed development;
- Pre-Application Response from London Borough of Hillingdon;
- Drawing SK100: Proposed Ground Floor Plan;
- Drawing SK101: Proposed First Floor Plan;
- Drawing SK102: Proposed Second Floor Plan;
- Drawing SK103: Proposed Third Floor Plan;
- Drawing SK104: Proposed Fourth/Fifth Plan;
- Drawing SK106: Proposed Sixth/Seventh Floor Plan;
- Drawing SK108: Proposed Eighth/Ninth Floor Plan;
- Drawing SK110: Proposed Tenth – Fourteenth Floor Plan;
- Drawing SK115: Proposed Roof Plan;
- Energy Statement by Ensphere Group;
- Sustainability Statement by Ensphere Group; and
- Transport Scoping Note by Vectos



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Pre-Application Background

A request for pre-application advice was submitted to the London Borough of Hillingdon on 4th August 2017. An initial pre-application meeting was held with the Council on 31 August 2017, attended by Mr **James Mclean Smith, the designated Case Officer, as well as Alesha Ladd, the Council's Urban Design Officer.**

Two further meetings were subsequently held with the LPA on the 13th September and 31st October.

The Council's formal response to the request for pre-application advice was received on the 6 December 2017. This response has been submitted alongside this application for your information.

The Site

The site measures approximately 0.8Ha and comprises two retail warehouses occupied by Wickes and Halfords, which were constructed approximately 20 years ago following the grant of permission in 1993.

Within the immediate vicinity, the site is bound by the following:

- Existing 2 and 3-storey residential dwellings to the north of the site located along Harefield Road and Lancaster Road;
- There are some small commercial units located to the east of the site on the Penfield Estate, currently used by a range of car repairers and cleaners;
- To the south-east of the site is a 4-storey office building and its associated car parking;
- The Uxbridge Police Station is located to the south-west of the site; and Uxbridge Magistrates Courts is located to the west of the site beyond Harefield Road. Further along Harefield Road to the north is a 3-storey block of apartments known as Laburnum Court.

Further detail on the site and surroundings is included within the Pre-Application Design & Access Statement submitted with this request for pre-application advice.

The Proposals

The proposals seek to provide 304 apartments, arranged as a mixture of studios; one-bedroom; two-bedroom and three-bedroom apartments within three blocks (Referenced as Building A, Building B and Building C) of accommodation laid out across the site. At ground floor level 10 parking spaces are proposed. The site will be accessed via the existing vehicular access from Harefield Road.

Building A consists of 95 units and also incorporates A1 commercial space at ground floor along with **children's playspace, The building also has its own lounge, business area and refuse store.** Building A varies in height from four-storeys facing Harefield Road to 8-storeys towards the middle of the site and six-storeys to the rear.

Building B is four-storeys high and consists of 39 units along with a refuse store.

Building C is the largest building and consists of 170 units, a plant room, gym, communal facilities, management suite, lounge, refuse store and a cycle store for the safe and secure storage of 434 cycles. In addition, an area of public open space is incorporated within a central courtyard area.

Building C has four distinct elements, a four-storey element to the east, a six-storey element to the north, a ten-storey element to the south with the highest element being **fifteen-storey's high located to the west** (or towards the middle of the site).

The site will be landscaped throughout and an improved public realm will be provided including a new footpath linking the site to the town centre.

A full schedule of accommodation is included within the submitted Pre-Application Design & Access Statement.

Planning Policy Context

The Development Plan relevant to this proposal consists of the following:

- The Hillingdon Local Plan: Part One - Strategic Policies (2012);
- The extant Saved Unitary Development Plan policies (2007) adopted as the Hillingdon Local Plan: Part Two;
- The London Plan consolidated with alterations since 2011 was published by the Mayor in 2015.

The site itself is located within the designated Uxbridge Town Centre but is not allocated or designated for a specific purpose.

Local Plan Part One Policies 2012

Policy H1: Housing Growth: The Council will meet and exceed its minimum strategic dwelling requirement, **where this can be achieved, in accordance with other Local Plan policies. The Borough's** current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten-year period between 2011-2021. Rolled forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of the Hillingdon Local Plan: Part 1- Strategic Policies.

Policy E4: Uxbridge: the council will strengthen the status of Uxbridge Town Centre as a Metropolitan Centre by **delivering growth... and promoting Uxbridge as a suitable location for retail, offices, hotels,** recreation and leisure, entertainment and culture, evening and night-time economy, education, community services, and mixed-use development. The Council will secure improvements to Uxbridge public transport interchange and the town centre boundary will be expanded.

Saved UDP Policies

Policy H4 requires a mix of housing units of different sizes to be provided in schemes of residential development including in particular units of one or two bedrooms. Within town centres predominantly one and two-bedroom developments will be preferable.

London Plan

Policy 3.3 (Increasing Housing Supply) confirms there is a recognition of the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways **that meet their needs at a price they can afford. To achieve this "the Mayor will seek to ensure the** housing need identified in paragraphs 3.16a and 3.16b is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners. This target will be **reviewed by 2019/20".**

In terms of the optimisation of housing potential, Policy 3.4 advises that "Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted". Table 3.2 identifies that the proposed development should reach a density of between 215 and 405 units per hectare.

Policy 3.8 deals with housing choice and states that "Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments".

The strategic element of Policy 7.7 'Location and Design of Tall and large Buildings' states that "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings".

London Plan – Housing Supplementary Guidance March 2016

Section 3.3 of the Housing SPG deals specifically with build to rent residential schemes. The SPG confirms that the private rented sector (PRS) is the only housing sector to have seen relative growth in recent years. It now houses 30% of all households in London, up from 14% in 2003/04. The SPG confirms that positive support should be given for long term private rented products through the land use planning system at local as well as strategic level, eg. recognising in Local Plans how the private rented sector can meet a range of needs and be particularly suitable for certain locations; as well as through development management.

In addition, the SPG states that “Long term, purpose built, private rented (build to rent) developments in block ownership and managed as a single development could make a particular contribution to meeting housing need. Such schemes are beneficial in a number of ways: they have the potential to accelerate delivery and not compete with nearby for sale developments; they can offer longer term tenancies/more certainty over long term availability; they can ensure high quality management through single ownership; and they can ensure a commitment to, and investment in, place making. They can also meet a wide range of needs, including those of singles, sharers, families and older people”.

Draft London Plan – December 2017

The emerging London Plan published in December 2017 contains within it Policy H13 which deals specifically with build to rent schemes. The Policy seeks to recognise that the Build to Rent development model differs from a traditional for sale scheme and the potential role it can play in accelerating delivery. It also confirms that the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent, preferably London Living Rent level.

Detailed Issues

Energy & Sustainability

Submitted with this application for pre-application advice are an Energy and a Sustainability Statement undertaken by Ensphere Group.

The Energy Statement provides an overview of the energy strategy in consideration of the site context, anticipated energy requirements and local priorities and initiatives. Consideration has also been given to the NPPF, GLA London Plan as well as the supporting guidance accompanying these documents.

Energy modelling has been undertaken and a sample of residential units has been modelled using SAP; the commercial space has been modelled using SBEM. It is proposed to reduce carbon emissions on site by >35% relative to Part L 2013. The residential component of the development will satisfy the London Plan Policy 5.2 “zero carbon” requirement through the use of “Allowable Solutions”.

Overall, the proposed energy strategy is considered consistent with the National Planning Policy Framework and policies of the GLA and the Council and, when implemented, will provide an efficient and low carbon development.

The Sustainability Statement submitted with this application provides an overview as to how the proposed scheme contributes to sustainable development in the context of the strategic, design and construction considerations.

Consideration has primarily been given to the planning policy context and other requirements prior to a review of sustainability in the context of the wider community, design and construction. The proposed scheme includes the redevelopment of the site to residential apartments. At a strategic level, the development of residential will assist with addressing the supply side housing shortages and will improve affordability.

A number of sustainable design features are proposed, and construction will be responsibly managed to ensure minimal impact on the environment and local community. Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.

Transport

The submitted Transport Scoping Note undertaken by Vectos sets out the work to be undertaken as part of the Transport Assessment, which will be prepared for the subsequent planning application.

The site is well served by transport services including numerous bus services and Uxbridge Underground station is located 300m to the east of the site. This is reflected in the site having a PTAL of 5.

As a result, the proposal seeks to accommodate limited parking on-site. In addition to this, the parking restrictions in the local area ensure that there is no potential for overspill parking. The applicant is willing accept a legal obligation/planning condition that restricts future occupiers from being able to obtain local parking permits. The proposed tenure is likely to result in a low level of car ownership.

The TRICS database has been interrogated to understand the likely number of trips associated with the proposed development. The net traffic impact is unlikely to negatively impact the local road network.

In terms of servicing, with regards to the residential element of the scheme, servicing will be undertaken onsite. The swept path analysis contained in Appendix B of the Scoping Note shows how this is achieved. The commercial units will be serviced using a layby at the site frontage along Harefield Road.

As a result of the scoping note, Vectos is seeking agreement from TfL and the GLA on the approach that will be undertaken in producing a Transport Assessment, with a particular focus on the proposed parking provision and the potential trip generation of the proposed development.

Affordable Housing

In terms of affordable housing, this will consist of units being let at a discount market rent. A viability assessment will be undertaken at the appropriate stage to confirm the amount to be provided.

Conclusions

The site is located within the defined boundary of Uxbridge Town Centre. The development will provide for a mix of predominantly one and two-bedroom apartments, offered on a build to rent basis. The mix of sizes of the units is preferable in terms of saved Local Plan Policy H4.

In accordance with London Plan Policy 3.8 the development will provide residents with a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in a high quality environment.

The development will contribute towards the Council's aims of housing growth as set out in Policy H1 of the Local Plan Part One, as well as the Mayor's aim for growth across London as set out in London Plan Policy 3.3.

London Plan Policy 3.4 requires that residential developments should be optimised on site and should be at the minimum densities set out in Table 3.2 of the London Plan. The site has a PTAL of 5 and therefore the density range for the development should be between 215–405 u/ha. The proposed development as it stands would provide a density of 333 u/ha and therefore satisfies this policy.

In accordance with London Plan Policy 7.7, tall and large buildings should not have an unacceptably harmful impact on their surroundings. The proposed development has been designed to ensure that there is limited impact on the surroundings.

An Energy Statement has been submitted and is consistent with the National Planning Policy Framework and policies of the GLA and the LPA and concludes that when implemented, the development will provide an efficient and low carbon development.

The Sustainability Statement submitted with this application provides an overview as to how the proposed scheme contributes to sustainable development in the context of the strategic, design and construction considerations. The proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.

A Transport Scoping Note has been submitted and seeks agreement from TfL and the GLA on the approach that will be undertaken in producing a Transport Assessment, with a particular focus on the proposed parking provision and the potential trip generation of the proposed development; and The provision of build to rent schemes is supported in general by the Housing SPG, the Housing White paper from February 2017 and the emerging London Plan published in December 2017.

Final Comments

It is hoped that the contents of this letter and the enclosed documents and drawings provide you with sufficient information to enable the provision of pre-application advice. As per the existing protocol we would also appreciate the opportunity to meet with you and discuss the proposed development.

Should you have any queries or require any further information in the interim, please do not hesitate to contact me on 01928 785906.

Yours faithfully

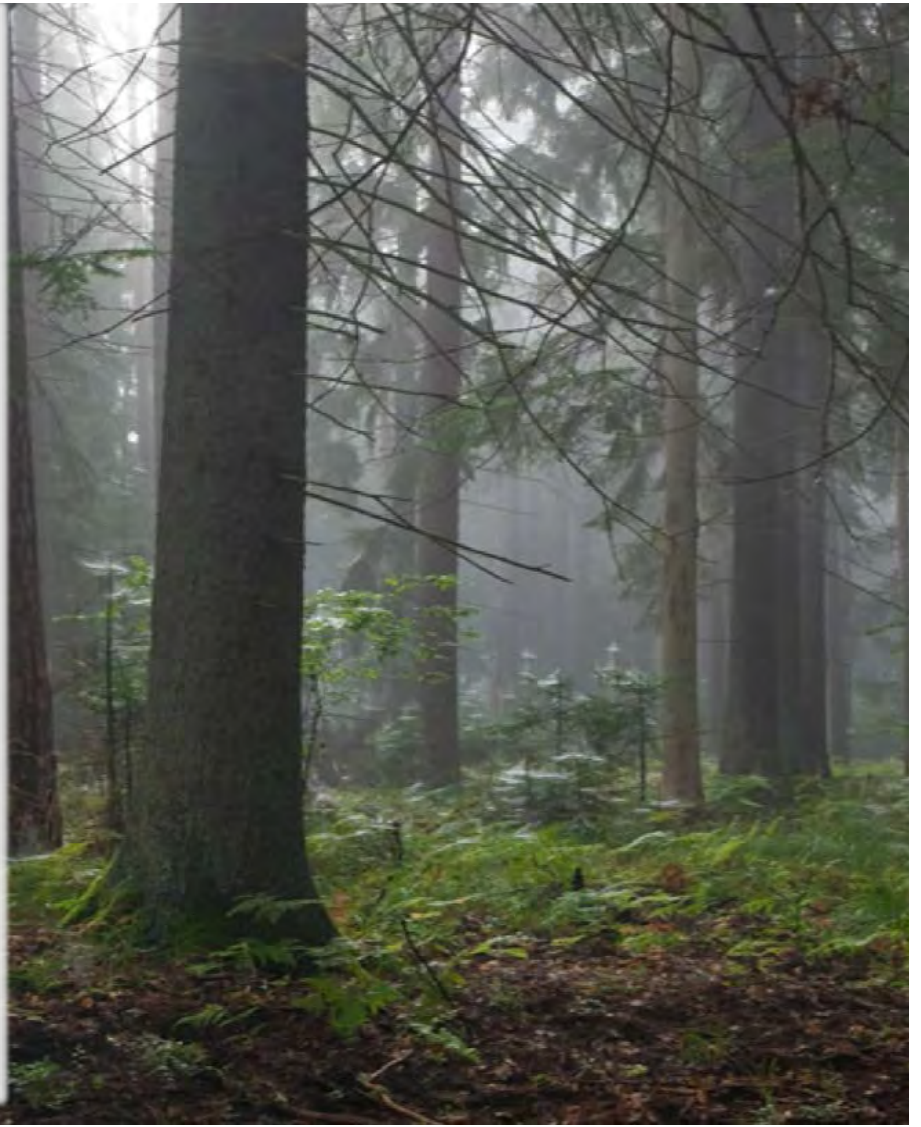
A handwritten signature in black ink, appearing to be 'PP' followed by a stylized, cursive signature.

FOR THE WATKIN JONES GROUP
Clare Droog
Associate Planner

Harefield Road, Uxbridge

Sustainability Statement

**Ensphere Group Ltd on behalf of
Watkin Jones**



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Harefield Road, Uxbridge

Sustainability Statement

Client Name: Watkin Jones

Document Reference: 17-E051-004

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Quality Assurance Approval Status

This document has been prepared and checked in accordance with Ensphere Group Ltd's Quality Management System.

Issue:	Version:	Prepared by:	Reviewed by:	Date:
Final	V1	Pete Jeavons	Pete Jeavons	December 2017

Sustainability

Energy

Climate Change

Socio-Economic

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1. Executive Summary

- 1.1 This Sustainability Statement presents the sustainability credentials for a proposed scheme at Harefield Road, Uxbridge.
- 1.2 Consideration has primarily been given to the planning policy context and other requirements prior to a review of sustainability in the context of the wider community, design and construction.
- 1.3 The proposed scheme includes the redevelopment of the site to residential flats. At a strategic level, the development of residential will assist with addressing the supply side housing shortages and will improve affordability.
- 1.4 A number of sustainable design features are proposed, and construction will be responsibly managed to ensure minimal impact on the environment and local community.
- 1.5 Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.

2. Introduction

- 2.1 Ensphere Group Ltd was commissioned by Watkin Jones to produce a Sustainability Statement for a proposed development at Harefield Road, Uxbridge.

Site & Surroundings

- 2.2 The Application Site is located to the north of Uxbridge town centre immediately east of Uxbridge Magistrates' Court and North East Uxbridge Police Station. The site fronts Harefield Road with secondary access from Warwick Place. Harefield Road connects to the A4020 and B482 from where the M40 can be accessed. The site is bordered by residential uses to its North and North East, light industrial and office to its East and South and civic uses to its West.
- 2.3 The town of Uxbridge is a significant retail and commercial centre, and is the location of Brunel University and the Uxbridge campus of Buckinghamshire New University. It borders Buckinghamshire, the River Colne and the Grand Union Canal to its West.
- 2.4 The High Street, Uxbridge Station, Grand Union Canal and River Colne are all within 500m of the site. The site has a PTAL rating of 5, assisted by its close proximity to Uxbridge Underground Station and Uxbridge Bus Station.
- 2.5 The site is currently occupied by Wickes and Halfords stores. Both are two storeys in height and are located to the East of the site with car parking occupying the West onto Harefield Road. The site ramps up from Harefield Road with a retaining wall along the street front.

Proposed Development

- 2.6 Development proposals include the redevelopment of the site to residential flats with commercial space on the ground floor.

Report Objective

- 2.7 The objective of the Sustainability Statement is to outline how sustainability and the principles of sustainable development have been incorporated into the development proposals.

3. Assessment Methodology

Sustainability & Sustainable Development

- 3.1 “Sustainability” is a broad concept generally used to describe the ability to perpetuate a particular state of being. It is widely used in the context of development and where there is potential for changing circumstances to cause an impediment to the perpetuation of a phenomenon.
- 3.2 The term is subjective and the understanding of the concept is influenced by perceptions and aspirations. “Sustainability” is therefore variably defined but normally encapsulates a wide range of issues, often characterised by their relationship with the economy, society and the environment (the “three pillars” of sustainability).
- 3.3 These issues are not necessarily mutually exclusive and whilst they are often presented as such, technically, the economy is a function of society; and society concerns the interrelationships and behaviours of one species within the wider environment. Nevertheless, the identification and characterisation of these issues enables a better understanding of the things that matter in decision making, which enable a balance to be struck when priorities compete.
- 3.4 The term “sustainable development” is often used interchangeable with “sustainability” but it is narrower in scope and seeks to promote the perpetuation of human advancement. The “Brundtland Report” (officially titled “Our Common Future” and written by the United Nations World Commission on Environment and Development, Chaired by Gro Harlem Brundtland in 1987), presents perhaps the most widely cited and understood interpretation of this concept:

“Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs”

- 3.5 The definition introduces the concept of “needs” and the generational timeframe for evaluating whether an action is sustainable or otherwise.
- 3.6 Whilst the Brundtland Report has contributed significantly to understanding the core principles of the subject, the definition has been advanced; and in the context of planning and development in England, the term “sustainable development” is defined very broadly within the National Planning Policy Framework (NPPF).

Analysis Methodology

- 3.7 Given the broad definitions associated with the terminology of “sustainability” and “sustainable development”, understanding how these concepts have been interpreted and incorporated

into the local planning regime requires a review of the planning policy as well as the documents upon which the policy is based. The report therefore commences with an overview of the sustainable communities' strategy, planning policy and other considerations.

- 3.8 An appraisal of the sustainability credentials of the scheme then follows. Structure is important when assessing sustainability due to the breadth of issues being considered; and an approach has been created based upon the phases of the development cycle relevant to the planning decision making processes; with consideration given to the "three pillars" (discussed above) and requirements of policy.

Assessment Matrix

	Economic	Social	Environmental
Strategic	✓	✓	✓
Design	✓	✓	✓
Construction	✓	✓	✓

- 3.9 It is recognised that the scale and nature of the scheme will affect the relative importance of the matrix dimensions and entries. For example, a single residential unit is unlikely to be viewed as having a major societal impact on the basis of its scale relative to its context. However, the societal implications of an urban extension may be much more significant.
- 3.10 The emphasis is therefore case specific and the assessment sections of this report seek to highlight the relevant factors in a suitably balanced manner.

4. Sustainable Communities

- 4.1 The status quo should not necessarily be interpreted as representative of a sustainable community on the basis that it ignores a need (or desire) to evolve in the context of change and over the course of time.
- 4.2 The aspirations of and for an area are, perhaps, most clearly represented through the democratic process and whilst conflicts of interests can exist between local, national and international priorities, local considerations are considered of greatest pertinence in this instance and in the context of local decision making.

Hillingdon's Sustainable Community Strategy 2011

- 4.3 Hillingdon's Sustainable Community Strategy sets out 10 key priorities for joint working between the major public services in Hillingdon, focussed on the things that matter most to local people.

Sustainable Community Priorities

- Help people to lead healthier, independent lives;
- Prevent more young people from undertaking risky behaviour;
- Increase housing supply – with appropriate infrastructure;
- Reduce re-offending;
- Increase participation in sport and physical activity;
- Maintain resident satisfaction levels;
- Promote and invest in town centres;
- Increase access to employment, apprenticeships and skills;
- Maintain parks and green spaces;
- Make it easy for residents to recycle.

5. Planning Policy Context

- 5.1 National and local planning policy relevant to sustainable development is considered in detail below:

National Planning Policy Framework

- 5.2 The Department for Communities and Local Government determines national policies on different aspects of planning and the rules that govern the operation of the system.
- 5.3 The National Planning Policy Framework (NPPF) defines “sustainable development” in the context of the planning system in England as comprising policies 18 to 219, taken as a whole, of the NPPF. A “presumption” is established in favour of sustainable development.

London Planning Policy Framework

- 5.4 Key London Plan planning policy is detailed below:

The London Plan as Altered (2016)

- 5.5 The London Plan is the overall strategic plan for London. Chapter five details *London’s Response to Climate Change* and include a number of policies that set the overarching principles for reducing carbon emissions in the built environment, predominant of which is Policy 5.3 as follows:

Policy 5.3 – Sustainable Design & Construction

Strategic

- A) The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Planning Decisions

- B) Development proposals should demonstrate that sustainable design standards are integral to the proposals, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- C) Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles apply:
- a) Minimising carbon dioxide emissions across the site, including the building and

services (such as heating and cooling systems);

- b) Avoiding internal overheating and contributing to the urban heat island effect;
- c) Efficient use of natural resources (including water), including making the most of natural systems both within and around buildings;
- d) Minimising pollution (including noise, air and urban run-off);
- e) Minimising the generation of waste and maximising reuse or recycling;
- f) Avoiding impacts from natural hazards (including flooding);
- g) Ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions;
- h) Securing sustainable procurement of materials, using local supplies where feasible; and
- i) Promoting and protecting biodiversity and green infrastructure.

D) Within LDFs boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor's supplementary planning guidance that are specific to their local circumstances.

Local Planning Policy Framework

- 5.6 The relevant planning authority is the London Borough of Hillingdon and planning policy for the area is detailed in several statutory documents.

Local Plan Part 1 – Strategic Policies (2012)

- 5.7 The Hillingdon Local Plan: Part 1- Strategic Policies is the key strategic planning document for Hillingdon and will support the delivery of the spatial elements of the Sustainable Community Strategy. It sets out the long-term vision and objectives for the Borough, where, and how this will be achieved.
- 5.8 The following policies are considered most relevant to this report:

Policy NPPF 1 – National Planning Policy Framework - Presumption in Favour of Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Encourage new housing developments in sustainable locations;
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Policy BE1 – Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Be designed to include “Lifetime Homes” principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people’s lives;
2. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);
3. Improve areas of poorer environmental quality, including within the areas of relative

disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;

4. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
5. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
6. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;
7. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;
8. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;
9. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation

Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.

Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

Policy EM1 – Climate Change Adaptation and Mitigation

The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.
5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.
8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
9. Promoting new development to contribute to the upgrading of existing housing stock

where appropriate.

The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:

10. Locating and designing development to minimise the probability and impacts of flooding.
11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
12. Giving preference to development of previously developed land to avoid the loss of further green areas.
13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks
14. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.

Unitary Development Plan (1998) Saved Policies

- 5.9 Whilst saved policies of the Unitary Development Plan remain part of the development framework, the presented policies are not considered of particular relevance to this Statement.

6. Other Policy & Regulatory Considerations

- 6.1 This section comprises an overview of other considerations relevant to the Sustainability Statement.

National Planning Practice Guidance

Climate Change

- 6.2 Advises how planning can identify suitable mitigation and adaption measures in plan-making and the application process to address the potential for climate change.

Design

- 6.3 Design affects how people interact with places and can affect a range of economic, social and environmental objectives. The guidance states that planning policies and decisions should seek to ensure that the physical environment supports these objectives.

Natural Environment

- 6.4 Explains key issues in implementing policy to protect biodiversity, including local requirements.

Renewable and Low Carbon Energy

- 6.5 The guidance is intended to assist local councils in developing policies for renewable energy in local plans, and identifies the planning considerations for a range of renewable sources.

London Planning Practice Guidance

Sustainable Design and Construction Supplementary Planning Guidance (April 2014)

- 6.6 The Mayor has published supplementary planning guidance on Sustainable Design and Construction. The document provides guidance on the implementation of London Plan policy 5.3 as well as a range of policies, primarily in Chapters 5 and 7 that deal with matters relating to environmental sustainability.

Emerging Local Plan

Draft Local Plan Part 2 - Development Management Policies (2015)

- 6.7 The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and Policies Map. Once adopted it will deliver the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies (2012).
- 6.8 The following draft policies are noted:

Draft Policy DMHB 11 – Design of New Development [extract]

- A) All development, including extensions, alterations and new buildings will be required to be designed to the highest quality standards and, incorporating principles of good design including:
- iii. Ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

Draft Policy BMEI 1 – Living Walls and Roofs and On-Site Vegetation

All development proposals are required to comply with the following:

- i. All major development⁶ should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and
- ii. Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

Draft Policy DMEI 2 – Reducing Carbon Emissions

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

Draft Policy DMEI 3 – Decentralised Energy

- A) All major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN).
- B) Major developments located within 500 metres of an existing DEN, and minor new-build

developments located within 100 metres, will be required to connect to that network, including provision of the means to connect to that network and a reasonable financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible.

C) Major developments located within 500 metres of a planned future DEN, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be required to provide a means to connect to that network and developers shall provide a reasonable financial contribution for the future cost of connection and a commitment to connect via a legal agreement or contract, unless a feasibility assessment demonstrates that connection is not reasonably possible.

D) The Council will support the development of decentralised energy networks DENs and energy centres in principle, subject to meeting the wider policy requirements of this plan and in particular on design and air quality.

Eric Pickles Written Statement to Parliament (25 March 2015)

- 6.9 On the 25 March 2015, the Department for Communities and Local Government and The Right Honourable Eric Pickles produced a Written Statement to Parliament. This included the following statements in relation to the Code for Sustainable Homes:

Plan Making [extract]

From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the Code, aside from the management of legacy cases.

- 6.10 The Deregulation Bill was given Royal Assent on 26 March 2015.

Decision Taking, Transition and Compliance [extract]

Where there is an existing plan policy which references the Code for Sustainable Homes, authorities may continue to apply a requirement for a water efficiency standard equivalent to

the new national technical standard, or in the case of energy a standard consistent with the policy set out in the earlier paragraph in this statement concerning energy performance.

7. Site Context & Strategic Appraisal

Site Context

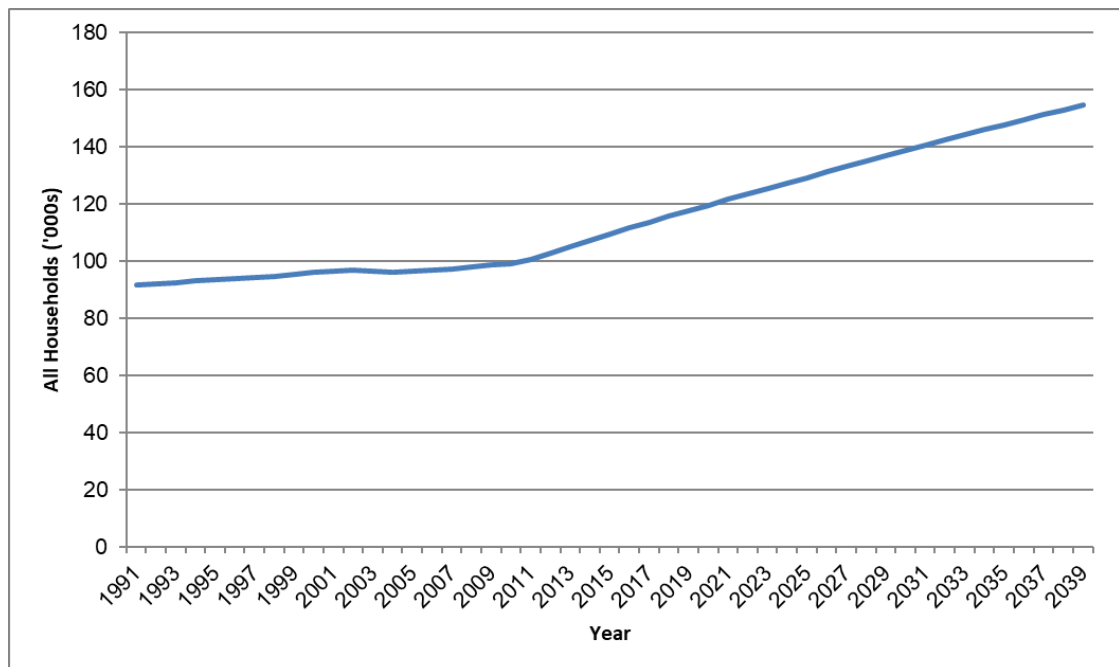
- 7.1 In line with the “three pillars” of sustainability discussed within the methodology section, the site context has been considered with regard to its economic, social and environmental context; acknowledging that interrelationships exist between many of these issues.

Socio Economic Context

Household Projections, 2012-2037

- 7.2 The Department for Communities and Local Government has produced a statistical release on the projected number of households in England and its local authority districts up to 2037. The figures are based upon the 2012-based sub-national population projections, published by the Office for National Statistics (ONS) in May 2014.
- 7.3 The assumptions underlying national household and population projections are based on demographic trends. They are not forecasts as, for example, they do not attempt to predict the impact of future Government policies, changing economic circumstances or other factors that might influence household growth. The projections show the household numbers that would result if the assumptions based in previous demographic trends in the population and rates of household formation were to be realised in practice.

Figure 7.1 Household Projections (Hillingdon Unitary Authority)



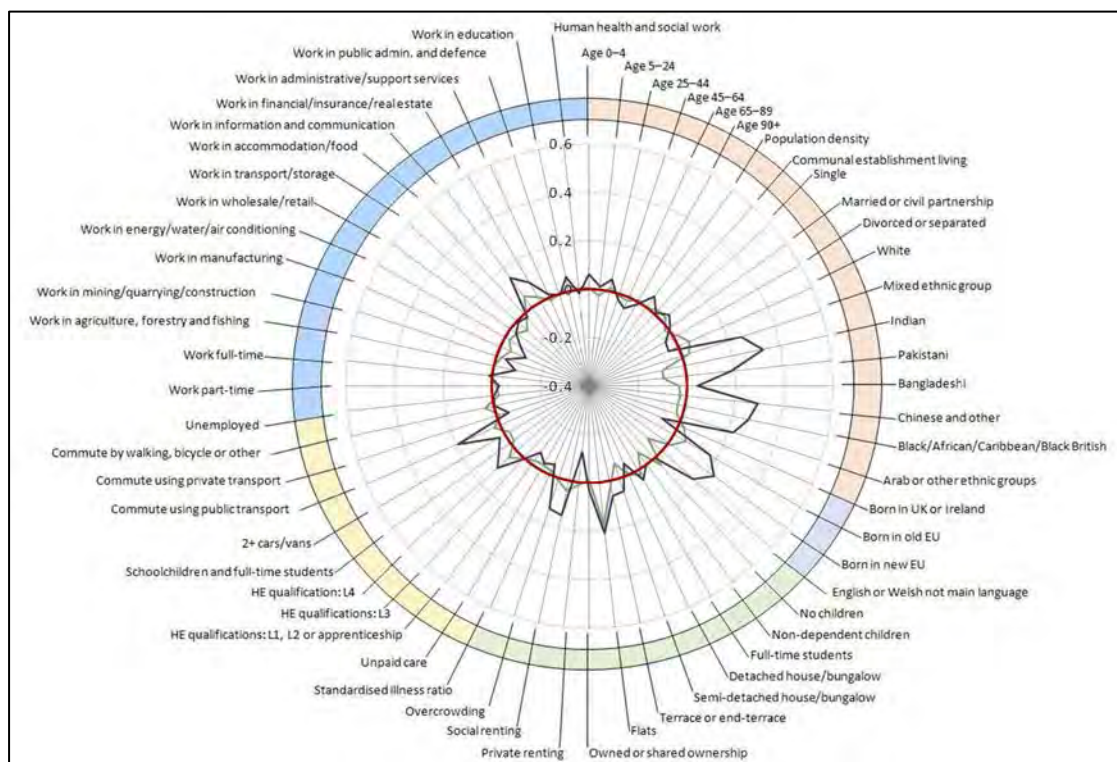
- 7.4 The above is extracted from Table 406 in the DCLG’s supporting information and shows a 36% predicted increase in households between 2017 and 2039. Data from Table 415 of the

DCLG's supporting information suggests that most of this growth (94%) is anticipated to be from an increasing population; rather than as a result of other changes such as household formation.

Output Area Classifications

- 7.5 Area classifications for Great Britain have been produced after every census since 1971, and as of the 2001 Census, they have been extended to cover the UK as a whole.
- 7.6 Using socioeconomic and demographic data from each census, the classifications seek to identify areas of the country with similar characteristics. Therefore, the presented information should not be interpreted as an assessment specific to the Application Site and the surrounding area; but rather it is a reflection of the characteristics of areas with a similar socioeconomic and demographic pattern.
- 7.7 Data from the 2011 Census has been released identifying the site as having an Output Area Code of E00176455 and classified as "Multicultural Metropolitans" (Supergroup Code 4), "Asian Traits" (Group Code 4c) and "Inner City Ethnic Mix" (Subgroup Code 4c3).
- 7.8 Radial Plots are provided by the Office for National Statistics for each Output Area Code. Each data point on a radial plot displays the value for each one of the 60 standardised and transformed 2011 Census variables used.

Figure 7.2 Office for National Statistics Radial Plot



- 7.9 Data points with positive values represent variables that have a higher value than the standardised UK mean or the standardised parent cluster mean. Conversely, data points with negative values represent variables that have a lower value than the standardised UK mean or the standardised parent cluster mean. On each radial plot, a red circle represents the standardised UK mean and the standardised parent cluster mean.
- 7.10 The site is therefore located in an area identified as having a lower than average proportion of detached housing; and above average semi-detached and terraced housing. Flats were also above average. Social renting and overcrowding is higher than average. Public transport use is also relatively high.

Indices of Multiple Deprivation

- 7.11 The English Indices of Deprivation use 38 separate indicators, organised across seven distinct domains of deprivation. The Indices of Multiple Deprivation data are then constructed by combining the seven transformed domain scores, using the following weights; income (22.5%); employment (22.5%); health and disability (13.5%); education, skills and training (13.5%); barriers to housing and services (9.3%); crime (9.3%); and living environment (9.3%).
- 7.12 The IMD can be used to rank every Lower Layer Super Output Area in England according to their relative level of deprivation. The data is not a measure of affluence; therefore the area ranked as the least deprived is not necessarily the most affluent.
- 7.13 The IMD data comprise a numeric value in a scale of 1 to 32,844 (1=most deprived) and are represented in a coloured scale of deciles (1=most deprived – dark red; 10=least deprived – dark blue) in the respective maps.
- 7.14 Government data (illustrated below) indicates that the area ranks 20,309 out of 32,844; where 1 is the most deprived. The area is therefore considered to have a relatively high level of deprivation overall. The table below provides the data for the individual domains:

Table 7.1 **IMD Domain Scores**

Domain	Score
Income Rank	19,273
Employment Rank	21,400
Education, Skills and Training Rank	25,617
Health Deprivation and Disability Rank	18,292
Crime Rank	10,715
Barriers to Housing and Services Rank	17,750
Living Environment Rank	10,974
Rank of IMD Score	20,309

Note: Scores out of 32,844, where 1 is the most deprived.

Environmental Context

- 7.15 The environmental context is assessed in greater detail in the accompanying environmental reports. The following provides an overview of the pertinent matters:

Land Use

- 7.16 The site constitutes brownfield land, meaning that its development will reduce the pressure to develop elsewhere and on Greenfield.

Flooding / Groundwater

- 7.17 From review of the Environment Agency (EA) Indicative Flood Maps, the site is identified as being in Flood Zone 1 and having a low probability of flooding. Further consideration of flood risk along any proposed mitigation measures is presented in the accompanying Flood Risk Assessment.
- 7.18 According to the Environment Agency (EA) data, the site is not located within a Groundwater Source Protection Zone.

Ecology

- 7.19 In the absence of any significant existing soft landscaping, the ecological value associated with the area proposed for development is considered to be low.

Public Transport

- 7.20 Many of the social and economic issues concern accessibility, which in its broadest sense is regarded as a combination of access to local shops, services, amenities, employment opportunities; as well as access to public and other transport facilities.
- 7.21 Therefore, the accessibility of the proposed scheme to local amenities is a relevant consideration in determining whether the site represents a sustainable location.
- 7.22 According to the Transport for London mapping resource, the site has excellent access to public transport and has a PTAL rating of 5.
- 7.23 Further detail of the transport infrastructure can be found in the accompanying Transport Statement.

Strategic Appraisal

- 7.24 Both nationally and regionally there is a shortfall in housing, which is leading to property prices rising significantly faster than earnings; with implications for affordability and ownership. Local data suggests that these demand pressures are set to continue with ONS data for both populations and households in Sutton predicting continued growth over the forthcoming decades.

- 7.25 The lack of access to housing is often most acutely felt by for those people who are not yet on the housing ladder and who have not benefited in the increase in property asset values. Typically, these people will be the younger and those with lower incomes; the consequence being that the supply and demand imbalance is contributing towards intergenerational inequality by compromising the ability of current and future generations in meeting their own housing needs. This is inconsistent with the principles of “sustainable development” as defined by Brundtland; and if not addressed, will have longer term societal and economic implications.
- 7.26 At a local level, the Indices of Multiple Deprivation highlight a lower than average level of deprivation overall (20,309 of 32,844); although the domain scores for crime and the living environment were below average. Output Area Classification data indicated deviations from the national average in a number of areas including a predominance of flat accommodation above other accommodation types; as well as a higher than average level of overcrowding and social renting.
- 7.27 Therefore, whilst housing may be available locally, this housing is already well occupied. Furthermore, government data suggests an increasing population over the coming decades implying that the existing stock will be subjected to further demands.
- 7.28 A need is therefore considered to exist on the basis that the nature of the proposed development will help relieve anticipated future demand pressures on housing and assist with the rebalancing of the socio-economic factors. In addition, redevelopment will improve the urban setting and enhance safety and sense of security in the immediate surroundings.

8. Sustainable Design Proposals & Appraisal

- 8.1 This section presents an overview of the proposed sustainable design features for the scheme.

Health & Wellbeing

- 8.2 Design will take into consideration good practice daylighting criteria as recommended by the latest industry standards; it is proposed that daylighting and sunlight assessments are undertaken to inform any changes required to improve the visual environment wherever possible.
- 8.3 Thermal comfort will be considered in the context of designing the appropriate types of space heating, ventilation and cooling systems for each intended use and of allowing occupants to control internal conditions according to preference.
- 8.4 Access to the site shall be safe for pedestrians and cyclists and a security consultant shall be engaged in the design process to ensure the final design embodies the principles of Secured by Design in reducing the opportunity for and fear of crime.

Energy

- 8.5 Further detail on energy matters is presented in the Energy Statement accompanying the application.

Energy Efficiency

- 8.6 It is intended to optimise the extent of glazing to improve access to natural daylight whilst preserving heating within the properties.
- 8.7 It is intended that the performance of the building fabric will incorporate relatively low U-Values to reduce the rate at which the building loses heat, preserving the heat within the space and reducing the requirement for mechanical heating.

Low Carbon & Renewable Technologies

- 8.8 Renewable and low carbon technologies have been considered as part of the design following the prioritisation of efficiency. The following is proposed:
- Combined Heat & Power (CHP) – CHP is considered a potentially feasible and viable technology for the proposed scheme. It is anticipated that a centralised system could be used to provide heat for the residential part.

Water Conservation

8.9 Water saving fittings and appliances shall be installed and whilst appliances have yet to be selected, consideration has been given to inclusion of the following:

- WCs Dual flush 6 litre / 4 litre;
- Taps (excluding kitchen & external) Flow rate 4 litres / minute;
- Shower Flow rate 7.5 litre / minute;
- Kitchen sink taps Flow rate 5.5 litres / minute;

8.10 An overall rate of consumption of 105 litres / person / day will be targeted.

8.11 No irrigation systems are proposed and all landscaping will rely on manual watering.

Materials

8.12 The materials strategy for the development shall consider lifecycle environmental impacts, durability, responsible sourcing and pre-fabrication potential, with a view to optimising materials utilisation and safeguarding natural resources. Measures will include:

- The majority of major elements (walls, floors, roof) with an 'A' or 'A+' rating in the BRE's Green Guide to Specification;
- Use of all timber products that come from an accredited Forest Stewardship Council (FSC) source;
- Use of suppliers/products that operate Environmental Management Systems (e.g. ISO14001, EMS) as per minimum and BES 6001 certification for major applications; and
- Consideration of durability, pre-fabrication and dismantling potential in selecting main elements.

Operational Waste

8.13 Waste management shall prioritise prevention of waste generation and target re-use, recycling and recovery, in line with the Waste Hierarchy.

8.14 Responsibility for prevention of waste generation and re-use lies with the occupants/consumers; however, the developments can promote recycling by providing appropriate infrastructure and facilities.

8.15 The operational waste strategy comprises provision of dedicated space of adequate size and in convenient locations for storage of general refuse and recyclables. Storage provisions for

recyclables and refuse shall be considerate of the Building Regulations and Council requirements.

Pollution

- 8.16 Where conventional backup gas-fired boilers are employed, these will be selected to achieve a NO_x rating of <40mgNO_x/kWh. Low emissions CHP engines shall be selected as appropriate.
- 8.17 Transport emissions shall be minimal, as the site offers excellent connections to public transport services and a wide range of amenities at walking distance; the development shall also promote cycling by providing secure cycle storage spaces.
- 8.18 Measures relating to building design, fabric design and landscaping shall be implemented as appropriate so that internal ambient noise levels are acceptable for the intended use and do not compromise the health & well-being of occupants.
- 8.19 The external lighting strategy shall be designed to minimise light spillage and night time light pollution in line with the ILP's Guidance notes for the reduction of obtrusive light; low illuminance levels, fittings and controls shall be employed accordingly.
- 8.20 Good internal air quality will be achieved through the creation of a building envelope with a low air permeability; meaning that the building fabric will reduce the infiltration of pollution from the external environment.
- 8.21 The developer will also endeavour to avoid the use of materials with a high VOC (volatile organic compound) content; therefore ensuring an improved air quality for the completed development.

Design Appraisal

- 8.22 Based upon the above, it is considered that the design accords with planning policy and goes significantly beyond standard practice. As a result, the environmental impact of the building will be reduced and building occupants will benefit from improved health and wellbeing.

9. Sustainable Construction Proposals & Appraisal

- 9.1 It is recognised that the construction industry has the potential to cause significant environmental impacts through resource use, waste generation and pollution. It is therefore proposed to manage the construction phase in a sustainable manner to ensure that these impacts are reduced.

Responsible Construction Practices

Impacts on Neighbours, Pedestrians, Road Users and Workforce

- 9.2 The main contractor will register with the Considerate Constructors Scheme to ensure that the contractor carries out the construction operations in a safe and considerate manner, with due regard to local residents, road users, the workforce and the environment. A target of achieving a score of at least 35 and with a minimum score of 7 in each of the five sections shall be set. This represents a high level of performance and a commitment to responsibly manage construction activities.

Environmental Management

- 9.3 It is expected that the principal contractor for the project shall also operate a third party certified Environmental Management System (EMS), demonstrating sound management and systematic control of environmental impacts.

Materials Optimisation and Waste

- 9.4 A pre-demolition audit shall be undertaken to establish the potential for reuse of materials for on-site applications or salvaging for reuse/recycling off-site.
- 9.5 The Site Waste Management Plan (SWMP) will detail the design measures towards optimum use of materials, set specific targets for construction and demolition waste generation and appropriate mechanisms/protocols for segregating waste on-site and monitoring overall waste management.
- 9.6 The development will aim for more than 95% by tonnage of demolition and construction waste to be diverted from landfill as per minimum.

Pollution Prevention

Pollution Prevention Guidelines

- 9.7 The Environment Agency's (EA) Pollution Prevention Guidelines (PPG) shall be followed as appropriate to minimise pollution risks from construction activities; works will also be in line with the Environment Agency's Building a better environment, A guide for developers (2006) guidance.

Air Pollution

9.8 Best practice methods for minimising the formation of dust and emissions from construction activities shall be implemented, as appropriate to the specific site and proposed activities. Control measures may include:

- Appropriate site layout;
- Solid screens/barriers or other physical boundaries around dust/emission generating activities;
- Good site maintenance and regular inspections for liquid spillages; and
- Sealed storage for cement, sand and fine aggregates.

9.9 In addition to the above, the contractor shall comply with the BRE Code of Practice to control dust from construction and demolition activities.

Water Pollution

9.10 Appropriate measures shall be implemented to minimise risks of watercourse and underground water pollution, in line with EA's PPG 5 Works in, near or liable to affect watercourses and the Guide for developers Building a better environment, as stated above. Relevant guidance within the London Plan's SPGs shall also be followed as appropriate. Specific measures shall be outlined in the contractor's CEMP.

Construction Appraisal

9.11 Given that the development proposals are seeking to go significantly beyond standard practice; targeting best practice to mitigate many of the social and environmental impacts, the construction proposals are considered in accordance with sustainable development.

10. Summary

- 10.1 This Sustainability Statement provides an overview as to how the proposed scheme contributes to sustainable development in the context of the strategic, design and construction considerations.
- 10.2 Sustainability is a broad concept and covers a range of environmental, social and economic considerations. A review of the London Borough of Hillingdon's planning policy has identified a number of requirements relating to sustainability. Of these, Local Plan Part 1 policies NPPF1 (*National Planning Policy Framework – Presumption in Favour of Sustainable Development*), BE1 (*Built Environment*) and EM1 (*Climate Change Adaptation and Mitigation*) are considered of greatest pertinence. Consideration has also been given to the emerging Local Plan Part 2, NPPF, GLA London Plan as well as the supporting guidance accompanying these documents.
- 10.3 The proposed scheme includes the redevelopment of the site to provide residential accommodation.
- 10.4 At a strategic level, the development of residential will assist with addressing the supply side housing shortages and will improve affordability. In addition, the proposals are consistent with the objectives of the local community strategy.
- 10.5 A range of sustainable design and construction features are proposed including:
- Incorporation of Combined Heat and Power (CHP) and provision to allow connection to any future District Energy Network;
 - Water saving sanitary fittings and appliances to deliver a water efficient development;
 - The use of materials with a low lifecycle environmental impact and embodied energy;
 - Efficient construction and operational waste management;
 - Biodiversity enhancement;
- 10.6 Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.

Appendices

A. Site Plan



B. General Notes

The report is based on information available at the time of the writing and discussions with the client during any project meetings. Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by Ensphere Group Ltd for inaccuracies in the data supplied by any other party.

The review of planning policy and other requirements does not constitute a detailed review. Its purpose is as a guide to provide the context for the development and to determine the likely requirements of the Local Authority.

No site visits have been carried out, unless otherwise specified.

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Watkin Jones

Harefield Road, Uxbridge

Transport Scoping Note

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Appendices

Appendix A	- Site Layout Plan
Appendix B	- Swept Path Analysis
Appendix C	- TRICS Data

1 INTRODUCTION

- 1.1 Vectos has been appointed by Watkins Jones to provide traffic and transport advice in support of an application for a residential development at Harefield Road, Uxbridge.
- 1.2 The site is situated within Uxbridge town centre and is currently occupied by large retail warehouses.
- 1.3 The Applicant would like to submit a planning application to demolish the existing buildings and replace them with high quality housing and ground floor commercial space.
- 1.4 The proposed development of the site will provide circa 304 residential dwellings (as private rented accommodation) that will be accessed via Harefield Road.
- 1.5 This Transport Assessment scoping note has been prepared to inform the London Borough of Hillingdon (LBH) and the Greater London Authority (GLA) of the transport aspects of the scheme and to set out the proposed scope of the TA to be submitted as part of the planning application. In addition, a Framework Travel Plan will be prepared to accompany the planning application.

Baseline Context

- 1.6 A Halfords and Wickes currently make up the current use of the site at Harefield Road, Uxbridge, UB8 1JS. The site is bound by Uxbridge Police Station to the south, Uxbridge Magistrates Court to the west and residential use to the north and east.
- 1.7 The area surrounding the site benefits from good pedestrian links and an established network of footways providing convenient walking routes to local amenities. All the roads in the vicinity of the site have street lighting and footways on both sides of the roads, which are generally in good condition. The sites strategic location is shown in **Figure 1**.
- 1.8 The towpath along the Grand Union Canal provides opportunity to cycle away from vehicular traffic and is identified as National Cycle Route 6.
- 1.9 The site benefits from good cycle links. There are marked cycle lanes along Belmont and Oxford Road (A4020) which connect to the wider network of cycle routes.

- 1.10 In addition, according to the TfL Cycling Guide 6, there are quiet roads in the vicinity of the site that have been recommended by cyclists. This includes High Street (approximately 150m south) and Chippendale (approximately 850m southwest).

Local Facilities

- 1.11 There are a number of local amenities within a reasonable walking distance as shown in **Table 1** below.

Table 1: Local facilities

Facility Type	Facility Name	Approximate Distance	Approximate Walking time
Supermarket	Sainsbury's	0.65 km	8 mins
Retail	High Street Shop and Retail	0.13 km	2 mins
Health	Boots	0.70 km	9 mins
Leisure	truGym Uxbridge	0.75 km	9 mins
School	Hermitage Primary School	0.80 km	10 mins
School	Whitehall Nursery & Infant School	1.10 km	15 mins
College	Uxbridge College	1.30 km	15 mins

- 1.12 In particular, the site is very close to the High Street and a plethora of retail opportunities, as it benefits from a direct route on to the High Street via a pedestrian link through Beasley's Yard.

Public Transport

- 1.13 According to TfL's Webcat tool, the site has a public transport accessibility level (PTAL) rating of 5 (very good) on a scale of 1 (very poor) to 6b (excellent). This accessibility rating is supported by numerous local bus and Underground services.
- 1.14 There are a large number of locally accessible bus services from High Street. With frequent services towards destinations throughout London and the Uxbridge area. Given that the site is only 500m from Uxbridge Underground Station (which serves two Underground lines) and the site is located within Uxbridge town centre, the overall accessibility of the site is considered to be excellent.

Local Highway

- 1.15 High Street is a two-way urban road with a 30mph speed limit and forms a junction with Harefield Road to its north and joins Belmont Road to the south.
- 1.16 Harefield Road, which forms the western site boundary, is a two-way single carriageway road with a speed limit of 30mph. It has double yellow waiting restrictions along the site frontage. Just to the south, Harefield Road connects to a roundabout junction allowing access to the High Street and also provides a pedestrian/cycle crossing route.
- 1.17 To the north, Harefield Road joins the strategic network via Western Avenue (A40) which provides further connection to the M40.

Existing access

- 1.18 Vehicular access is currently gained via a ghost island priority junction from Harefield Road, towards the south eastern corner of the site.

On-Street Parking

- 1.19 On street parking, in the vicinity of the site, is provided in the form of a controlled parking zone. The controlled parking zone parking restrictions are in place Monday to Saturday (09.00-17.00).

Public Car Park

- 1.20 South of the site is the Cedars Car Park. The car park has 543 spaces and can be used from 06.30 to 20.00 Monday to Saturday and 09.00 to 18.00 on Sundays. There is an hourly pay regime with discounts for local residents. 24 hour parking options can be purchased via quarterly or annual subscriptions.

Policy Context

- 1.21 A review of all relevant transport policy at a national and local level will be undertaken, in order to assess the suitability of the proposals. The following policy documents will be reviewed:
- National Planning Policy Framework;
 - Hillingdon Local Plan: Part 1- Strategic Policies (adopted November 2012)
 - London Plan 2016

- Draft London Plan (Nov 2017)

2 THE PROPOSED DEVELOPMENT

- 2.1 This section of the note describes the development proposals, including details of access, parking and servicing.

Overview of Development

- 2.2 The outline application seeks permission for the construction of up to 304 residential dwellings with associated parking. The proposed accommodation schedule is as follows:

- 13 x Studio flats
- 121 x 1 bed room dwellings
- 7 x 1 bed room dwellings (disabled)
- 108 x 2 bed room dwellings
- 22 x 2 bed room dwellings (disabled)
- 16 x 3 bed room dwellings

- 2.3 In addition to the residential development, 260m² of commercial space is to be provided.

Access

- 2.4 The existing access off Harefield Road, currently used for the existing retail use, is to be retained as the shared access for all modes in to the proposed development. This will tie in with proposals to provide an attractive public realm in and around the site.
- 2.5 It is acknowledged that the existing access has a gradient which may not be compliant with the Disability Discrimination Act (DDA). As such, a footpath is to be provided along the southern perimeter of the site, this is shown on the site layout plan contained in **Appendix A**. This will connect with the existing through-route towards High Street towards local retail and transport facilities.
- 2.6 The existing junction appears to have generous kerb radii, which is consistent with a retail warehouse access that needs to accommodate regular large delivery vehicles. The amended junction has reduced radii and provides a more pedestrian friendly design (including tactile paving).

Servicing

- 2.7 The scheme accommodates both residential and commercial elements. With regards to the residential element of the scheme, servicing will be undertaken onsite. The swept path analysis contained in **Appendix B** shows how this is achieved.
- 2.8 The commercial units will be serviced using a layby at the site frontage along Harefield Road as detailed within **Appendix A**.

Parking

- 2.9 It is proposed that 8 parking spaces at ground level are to be provided, all these will be disabled parking spaces. **Table 2** and **Table 3** details the parking policy associated with the development.

Table 2: Hillingdon Borough Council parking standards

Use Class	Description	Car Parking Standard*	Cycle Parking Standard*
C3 (Residential)	Flats and houses without individual curtilages with communal parking in garages or open car parking areas	1.5 spaces per dwelling. (3,4)	Dwellings with 1-2 bedroom: 1 space. Dwellings with 2+ bedrooms: 2 spaces.

*All standards for car parking are maximum whilst the cycle parking standards are minimum

Table 3: London Plan Parking Guidance

Use Class	Description	Car Parking Standard*	Cycle Parking Standard*
C3 /C4	Dwellings (all)	Dwellings with 4+ bedroom: 2 space. Dwellings with 3 bedrooms: 1.5 spaces. Dwellings with 1-2 bedrooms: 1 space.	1 space per studio and 1 bedroom unit 2 spaces per all other dwellings

*

- 2.10 Given the highly accessible location of the site car-free or low-car provision should be appropriate. Furthermore, the London plan states that '*All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit*'.
- 2.11 The draft London Plan (2017) further enforces the above in Paragraph 10.6.2:

Maximum standards for car parking take account of PTAL as well as London Plan spatial designations and land use. Developments in town centres generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there. Opportunity Areas offer the potential to coordinate new transport investment with development proposals to embed car-free or car-lite lifestyles from the outset. Differences in car use and ownership between inner and outer London are recognised, with trip distances and trip patterns sometimes making walking and cycling difficult in outer London

- 2.12 Research has shown that tenure and/or area affects car ownership levels. For example, households that occupy rented accommodation can have up to 0.5 fewer cars than owner-occupied households in dwellings of smaller size and type.
- 2.13 Therefore, the proposed car parking provision for the flatted units is considered sufficient and in line with policy.

Cycle Parking

- 2.14 Cycle parking will be provided in a secure and sheltered area on the ground floor. The provision will be to London Plan standards and for the residential component will consist of 460 long stay cycle parking spaces and 8 short stay spaces.

3 TRAFFIC IMPACT

- 3.1 The site is currently occupied by two retail warehouse units and therefore generates a significant number of existing trips on the local road network.
- 3.2 The proposed scheme would also generate trips, however, the low parking provision will result in a relatively low level of traffic generation for a 304 unit scheme. The TRICS database has been interrogated to understand the likely level of trips associated with the proposed scheme. The TRICS data is included in full in **Appendix C**. The following selection criteria was applied:
- Category: Residential
 - Region: London, South East
 - Days: Weekdays only
 - Dates: 2009 to 2016
 - Location: Greater London
- 3.3 There were twenty one sites meeting the above criteria which were used to inform the vehicle trip rates given in **Table 4**.

Table 4 Residential Rates & Trip Generation: Person

Period	Trip Rates (per unit)			Trip Generation (304 units)		
	In	Out	Total	In	Out	Total
08:00 – 09:00	0.08	0.43	0.51	24	131	155
17:00 – 18:00	0.27	0.15	0.42	82	46	128

*errors due to rounding

- 3.4 The method of travel to work for the middle super output layer (MSOA) Hillingdon 015 has been extracted to establish a likely modal split. Due to the car-free nature of the site all vehicle trips have not been taken account for. **Table 5** below details the likely modal split.

Table 5: Method of travel to work for MSOA Hillingdon 015

Mode	Census modal split	Adjusted modal split
Underground, metro, light rail, tram	16%	32%
Train	4%	7%
Bus, minibus or coach	11%	22%
Taxi	0%	1%
Motorcycle, scooter or moped	1%	2%
Driving a car or van	47%	0%
Passenger in a car or van	3%	0%
Bicycle	2%	4%
On foot	16%	32%

3.5 **Table 6** below shows the anticipated number of trips by mode for both peak periods for the proposed development.

Table 6: Anticipated trips by mode in peak hours

Mode	AM Peak	PM Peak
Underground, metro, light rail, tram	50	41
Train	11	9
Bus, minibus or coach	34	28
Taxi	2	1
Motorcycle, scooter or moped	3	3
Driving a car or van	0	0
Passenger in a car or van	0	0
Bicycle	6	5
On foot	50	41
Total	155	128

*errors due to rounding

3.6 In order to understand the net difference between the existing and proposed trips. The TRAVL database was used to generate the likely trips for the existing site, this is shown below in **Table 7**. The exercise was based on Retail Warehouses within in London.

Table 7: Retail Warehouse Rates & Trip Generation: Person

Period	Trip Rates per 100sqm GFA			Trip Generation (Trips)		
	In	Out	Total	In	Out	Total
08:00 – 09:00	0.77	0.37	1.14	25	12	36

17:00 – 18:00	2.96	3.39	6.35	95	108	203
----------------------	------	------	------	----	-----	-----

*errors due to rounding

- 3.7 **Table 8** below shows the anticipated number of trips by mode for both peak periods for the proposed development.

Table 8: Existing Trips by mode in peak hours

Mode	AM Peak Hour	PM Peak Hour
Underground, metro, light rail, tram	12	65
Train	3	14
Bus, minibuss or coach	8	45
Taxi	0	2
Motorcycle, scooter or moped	1	4
Driving a car or van	0	0
Passenger in a car or van	0	0
Bicycle	1	8
On foot	12	65
Total	36	203

- 3.8 The net number of trips for the development is shown in **Table 9** below. It is evident that the development will have no material impact on the transport network.

Table 9: Net number of trips for the development

Mode	AM Peak Hour	PM Peak Hour
Underground, metro, light rail, tram	38	-24
Train	8	-5
Bus, minibuss or coach	26	-17
Taxi	2	-1
Motorcycle, scooter or moped	2	-1
Driving a car or van	0	0
Passenger in a car or van	0	0
Bicycle	5	-3
On foot	38	-24
Total	120	-75

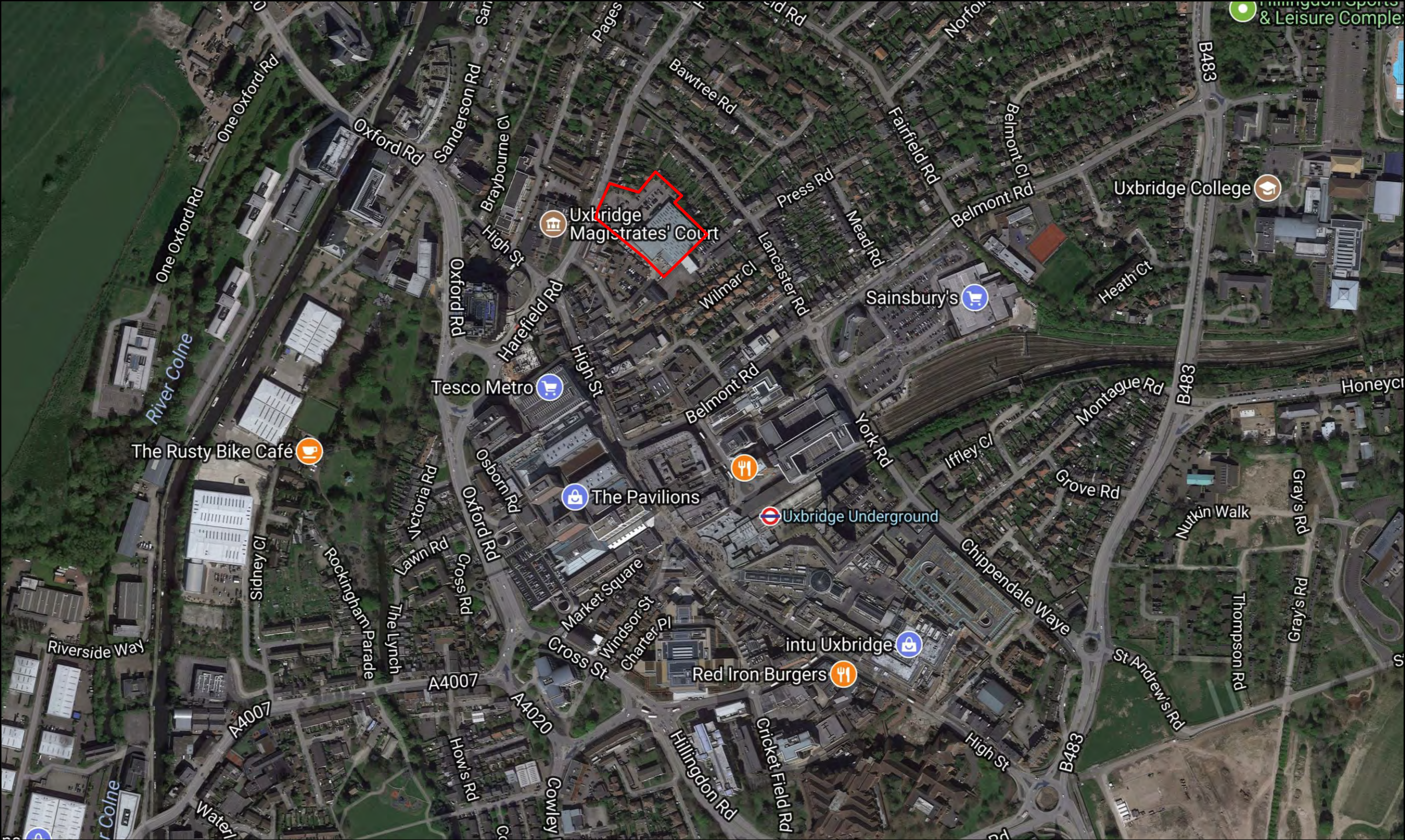
- 3.9 **Table 9 shows** that the proposed development will experience an additional 120 trips in the AM peak whilst experiencing 75 less trips in the PM peak. As a result, it is not proposed to undertake any highway junction or public transport analysis within the Transport Assessment.


4 SUMMARY

- 4.1 This scoping note sets out the work to be undertaken as part of the TA which will be prepared in relation to proposals for a residential development in at Harefield Road, Uxbridge.
- 4.2 The existing site is currently made up of retail use comprising a single Halfords units and a single Wickes unit.
- 4.3 The applicant seeks approval for the construction of 304 flatted units and 260 sqm of commercial space. 8 blue badge car parking spaces are proposed.
- 4.4 The proposed development seeks to accommodate limited parking on-site. In addition to this, the parking restrictions in the local area ensure that there is no potential for overspill parking. The applicant is willing accept a legal obligation/planning condition that restricts future occupiers from being able to obtain local parking permits.
- 4.5 468 cycle parking spaces will be provided for the residential component of the development which is in accordance with London Plan standards.
- 4.6 The proposed tenure is likely to result in a low level of car ownership.
- 4.7 The site is well served by transport services including numerous bus services, Uxbridge Underground station. This is reflected in the site having a PTAL of 5.
- 4.8 The TRICS database has been interrogated to understand the likely number of trips associated with the proposed development. The net traffic impact is unlikely to negatively impact the local road network.
- 4.9 As a result of this scoping note, Vectos is seeking agreement from TfL and the GLA on the approach that will be undertaken in producing a Transport Assessment, with a particular focus on the proposed parking provision and the potential trip generation of the proposed development.

IMPORTANT SECTION BREAK NEXT – DO NOT DELETE PAST THIS CHEVRON >

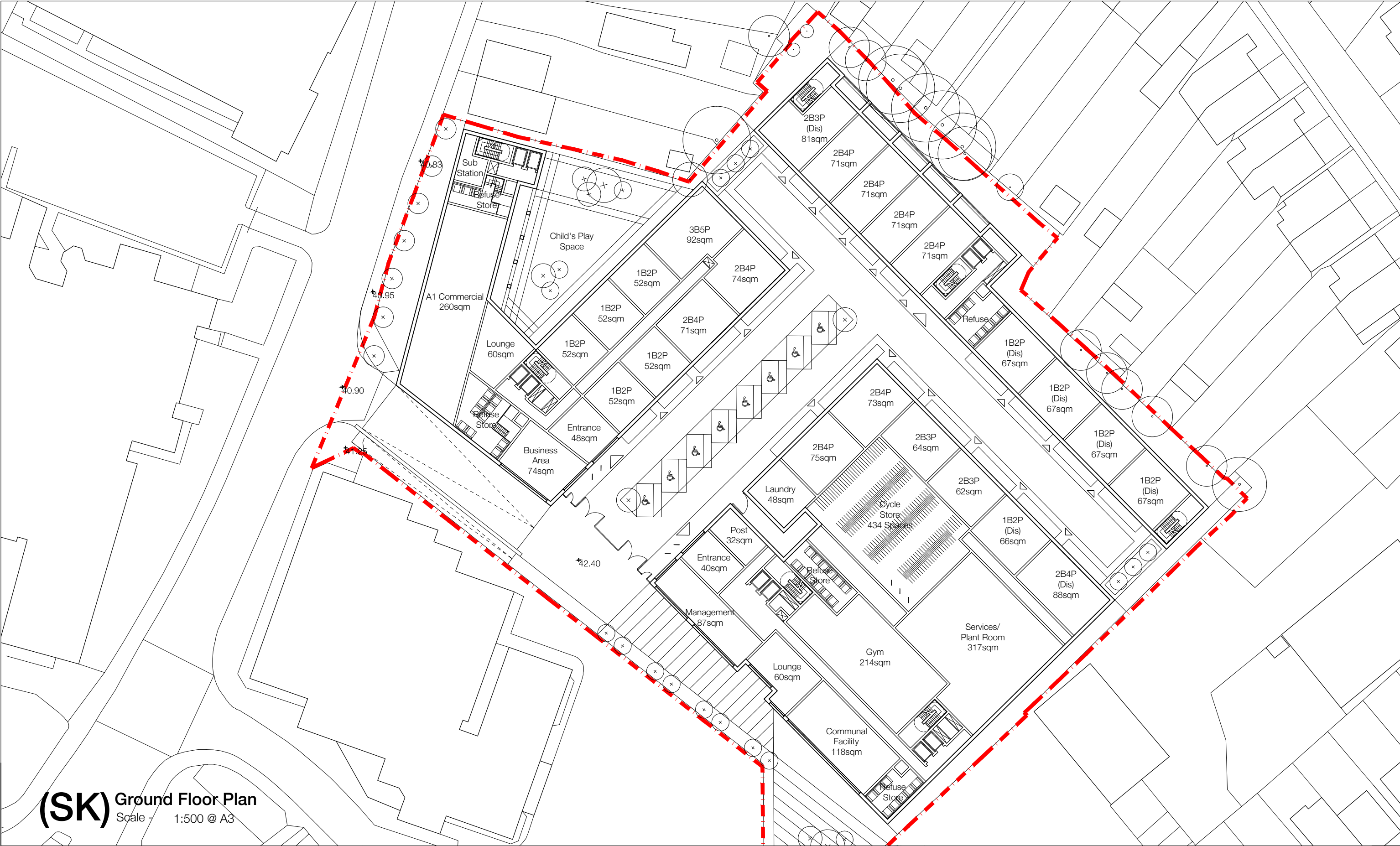
FIGURES



<div>Key:</div> <div><div></div>Site Location</div>	Watkins Jones				Harefield Road, Uxbridge	
	Site Location plan				<div> Network Building, 97 Tottenham Court Road, London W1T 4TP Tel: 020 7580 7373 Email: london@vectos.co.uk www.vectos.co.uk</div>	
	DRAWN: YA	CHECKED: xx	DATE:	SCALES:	DRAWING REFERENCE: Figure 1	

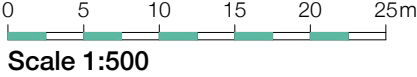
APPENDIX A

Site Layout



(SK) Ground Floor Plan
Scale - 1:500 @ A3

Sk8	CJCT Issue	AGB	11.12.17	OK
Sk7	Issue Following DTM 01 (29.11.17)	AGB	30.11.17	OK
Sk6	CJCT Issue	AGB	21.11.17	OK
Sk5	Tenure Update	AGB	10.03.17	TNT
Sk4	CJCT Issue	SKM	17.02.17	DJD
Sk3	CJCT Issue	AGB	15.02.17	DJD
Sk2	CJCT ISSUE	AGB	24.01.17	TNT
Sk1		DJD	05.01.17	TNT
Rev.	Des.	By	Date	Ch.



Contractor must verify all dimensions on site before commencing any work or shop drawings. If this drawing exceeds the quantities taken in any way the Architects are to be informed before the work is initiated. Only figured dimensions to be taken from this drawing. Do not scale off this drawing. Drawings based on Ordnance Survey and / or existing record drawings - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals. Authorised reproduction from Ordnance Survey Map with permission of the Controller of Her Majesty's Stationery Office. Crown Copyright reserved. © careyjones chapmantolcher (Studio South) Ltd. All Rights Reserved



Project:	Harefield Road, Uxbridge	Job No.	31029
Title:	Proposed Ground Floor Plan		
Scale:	1:500 @ A3	Drawn By:	DJD
Date:	Jan 17	Checked By:	TNT
Drawing No:	SK100	Revision:	SK08



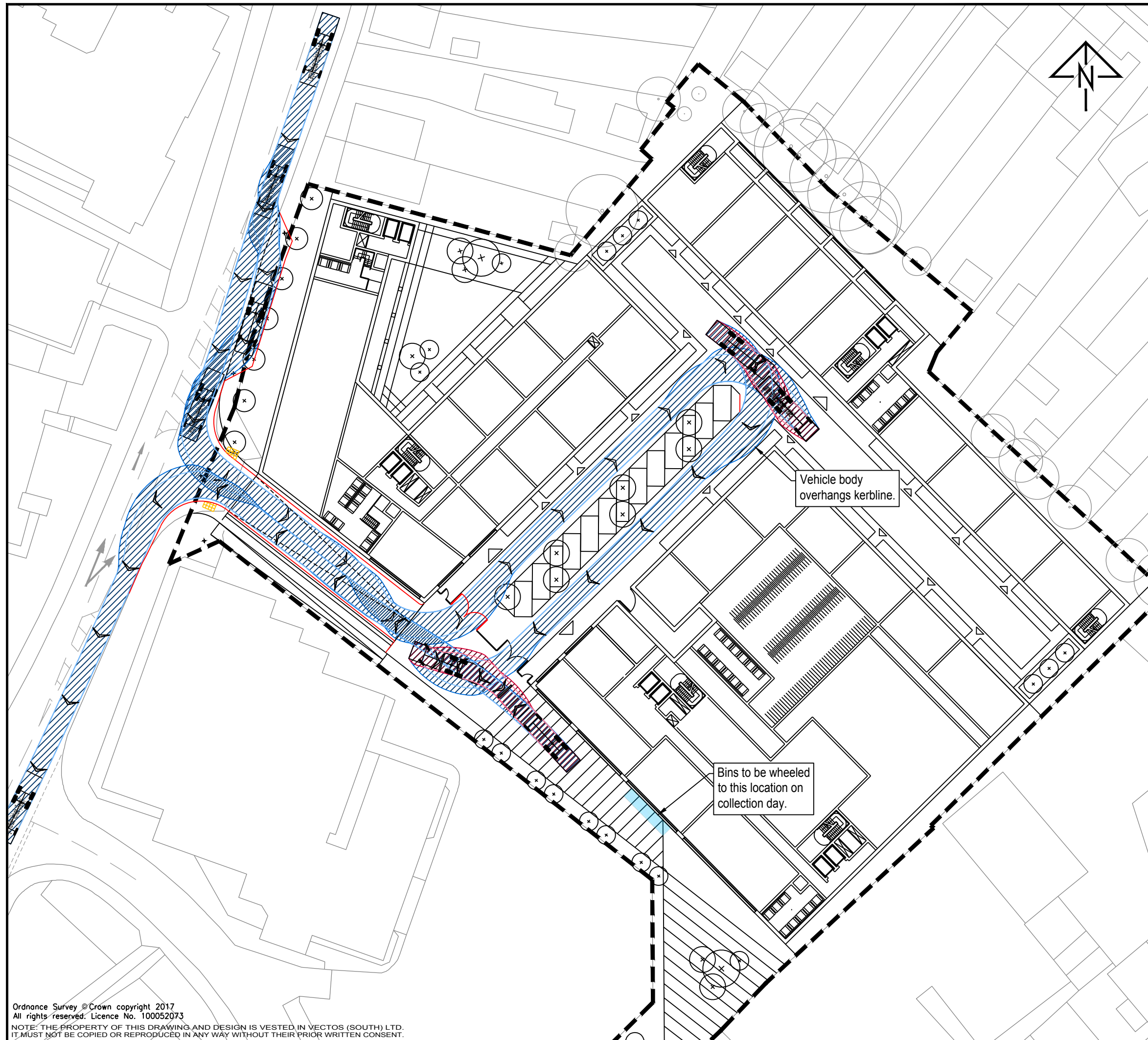
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DRAFT

APPENDIX B

Swept Path Analysis



Notes:

- 1. This is not a construction drawing and is intended for illustrative purposes only.
- 2. White lining is indicative only.
- 3. Layout: SK100 by CJCT.

Large Refuse Vehicle (3 axle)
Overall Length 9.860m
Overall Width 2.450m
Overall Body Height 3.814m
Min Body Ground Clearance 0.366m
Track Width 2.450m
Lock to lock time 4.00s
Kerb to Kerb Turning Radius 9.500m

REV.	DETAILS	DRAWN	CHECKED	DATE

CLIENT:

Watkin Jones & Son Ltd

PROJECT:

Harefield Road, Uxbridge

DRAWING TITLE:

Swept Path Analysis
Refuse Collection
Large Refuse Vehicle

SCALES:

1:500 at A3

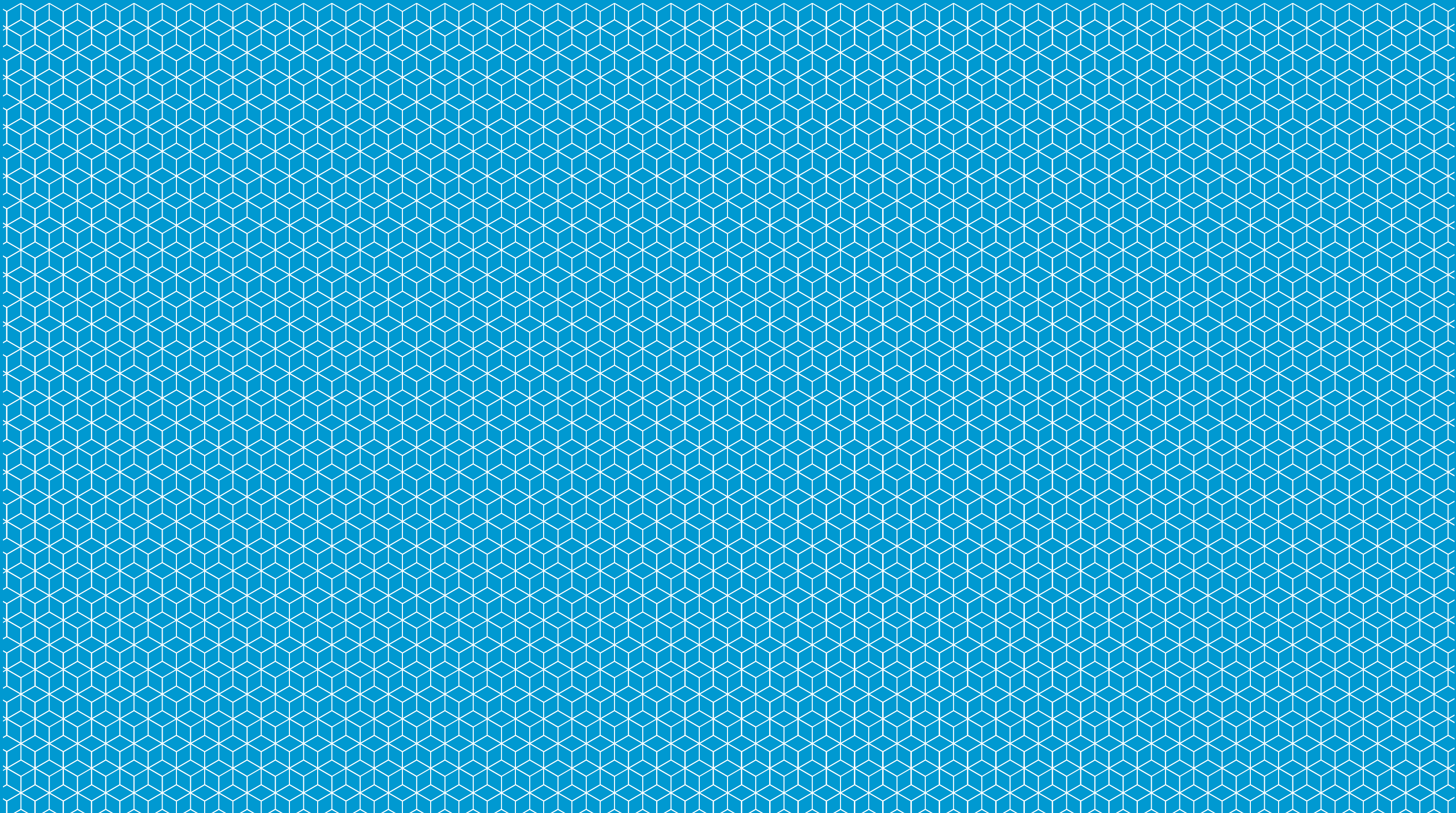
DRAWN: KB CHECKED: KH DATE: 07.12.2017

Network Building, 97 Tottenham Court Road, London W1T 4TP
t: 020 7580 7373 e: enquiries@vectos.co.uk

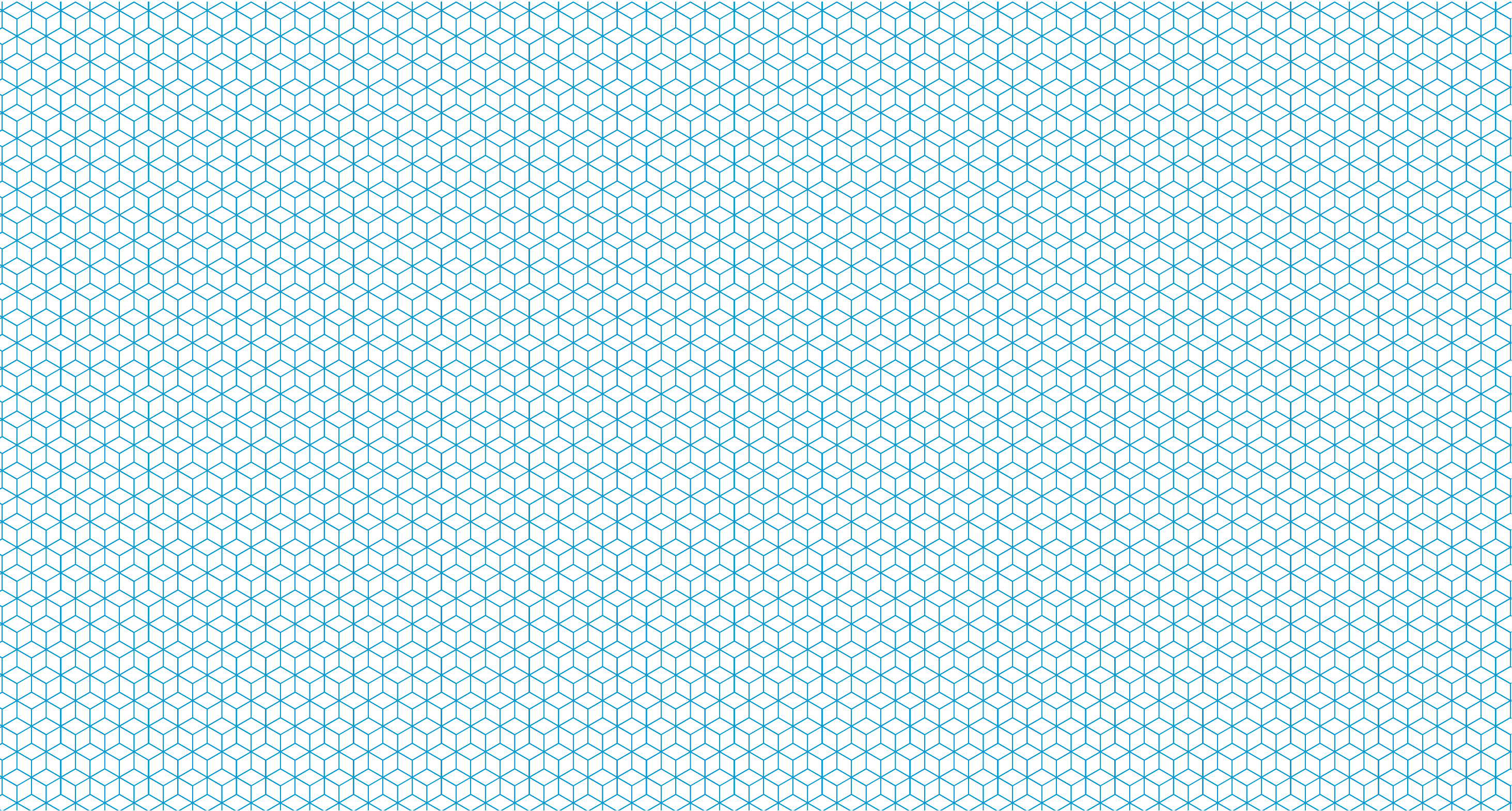
DRAWING NUMBER:

173284/AT/A01

REVISION:



Harefield Road, Uxbridge



01

Context

02

Analysis

03

Evolution

04

Proposals

05

Townscape

06

Servicing and Parking

07

Appearance and Materials

08

Summary

Introduction

Executive Summary

This document has been prepared by Carey Jones Chapman Tolcher on behalf of Watkin Jones Group as a Pre-Application document for the Harefield Road site in Uxbridge, London.

Watkin Jones Group has been responsible for delivering a significant number of build to rent schemes throughout the UK. Watkin Jones Group works closely with Five Nine Living who manage over 500 build to rent apartments across five different schemes.

The Harefield Road site is located in the Borough of Hillingdon where the council aim to meet and exceed the minimum strategic dwelling requirement with 4,250 new homes planed between 2011 and 2021.

The site sits within Uxbridge town centre and is currently occupied by large retail warehouses. Watkin Jones are seeking to demolish the existing buildings on the site and replace with high quality housing as well as activated street frontage at ground level to Harefield Road.

The purpose of this document is to catalogue the process from assessing the site, through to evaluating the design potential in accordance with the planning policies of Hillingdon Borough Council and the proposals which arise from this.

Brief

Project Brief

The Brief is to explore the site's potential for a high quality residential development.

The design should:

- Regenerate the 0.92 Ha Harefield Road site.
- Provide a mix of Studios, 1, 2 and 3 bed build to rent apartments.
- Optimise the development potential of the site.
- Demonstrate high quality design within the context of Hillingdon Borough Council's planing policy.
- Introduce shared amenity space.
- Take a considered approach to access.
- Positively contribute to the streetscape by activating the Harefield Road frontage.

Key Considerations during the design process have included:

- Key relevant national, regional and local planning policies.
- Design potential for mixed use space which incorporates a high quality building and amenity space.
- Building services
- Cycle storage.
- Car Parking.



Watkin Jones Build to Rent Experience



Clarendon Quarter

Clarendon Quarter

Location : Leeds

Building Use : Build to rent

Unit Numbers : A total of 323 residential apartments.

Communal Facilities : Gym, games room, lounges and laundry room.

Completion:

Building Management : Five Nine Living



The Wharf

The Wharf

Location : Droylesden

Building Use : Build to rent

Unit Numbers : A total of 67 residential units consisting of one, two and three bedroom apartments and three, four and five bedroom houses.

Completion :

Building Management : Five Nine Living



The Gateway

The Gateway

Location : Sheffield

Building Use : Build to rent

Unit Numbers : A total of 78 one and two bedroom residential apartments.

Completion :

Building Management : Five Nine Living

Watkin Jones & CJCT Experience



Albion Way

Albion Way

Location : Wembley, London.

Building use : Student residential.

Number of units : 283 Student bedrooms.

Communal facilities : Common room, study suite, cycle storage, roof terrace.

Additional uses : Flexible A1, A2, A3, B1, D1, D2 space at ground level.



Forrest Road

Forrest Road

Location : Walthamstow, London.

Building use : Student residential.

Number of units : 353 Student bedrooms.

Communal facilities : Common room, study suite, cycle storage, roof terraces.

Additional uses : B1 space at ground and mezzanine level.



Britannia Street

Britannia Street

Location : Camden, London.

Building use : Student residential.

Number of units : 230 Student bedrooms.

Communal facilities : Common room, study suite, cycle storage.

Additional uses : Performance gallery, B1 space, two residential apartments.

CJCT Build to Rent Experience



Monk Bridge, Leeds

Monk Bridge, Leeds

Location : Leeds.

Building use : Build to rent.

Number of units : A total of 600 one, two and three bedroom residential apartments.

Communal facilities : Indoor and outdoor amenity space, cycle stores, car parking.

Additional uses : A1, A2, A3, B1 spaces, 350m long park over existing Victorian viaduct.



Tolworth Tower,

Tolworth Tower

Location : Kingston Upon Thames, London

Building use : Build to rent.

Number of units : A total of 311 one, two and three bedroom residential apartments and 68 serviced apartments.

Communal facilities : Indoor and outdoor amenity space, cycle stores, car parking.

Additional uses : A1, A2, A3, B1 spaces



Hatbox

The Hatbox

Location : Manchester

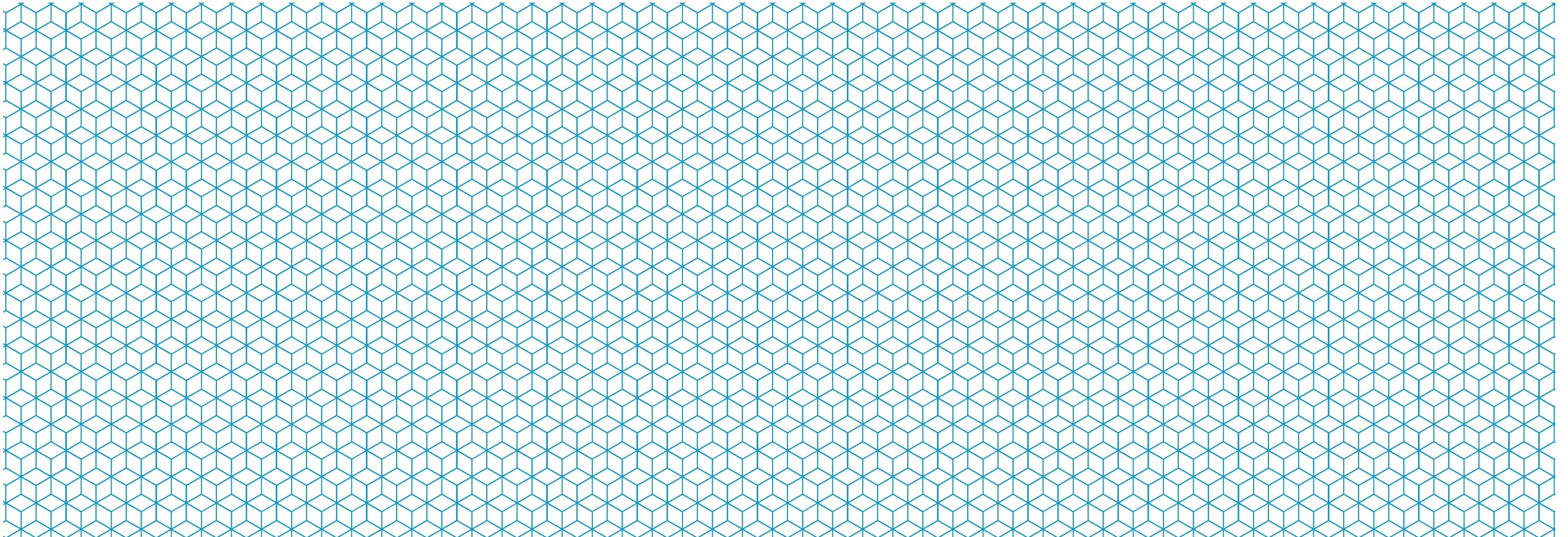
Building use : Build to rent.

Number of units : A total of 114 one, two and three bedroom residential apartments.

Communal facilities : Outdoor amenity space, cycles store, car parking.

01

Context



Urban Context

Urban Context

The site is located in Uxbridge in the borough of Hillingdon, West London.

The town of Uxbridge is a significant retail and commercial centre, and is the location of Brunel University and the Uxbridge campus of Buckinghamshire New University. It borders Buckinghamshire, the River Colne and the Grand Union Canal to its West.

Uxbridge is connected to the rest of London via Uxbridge Underground Station, which is the western terminus for Metropolitan and Piccadilly lines.

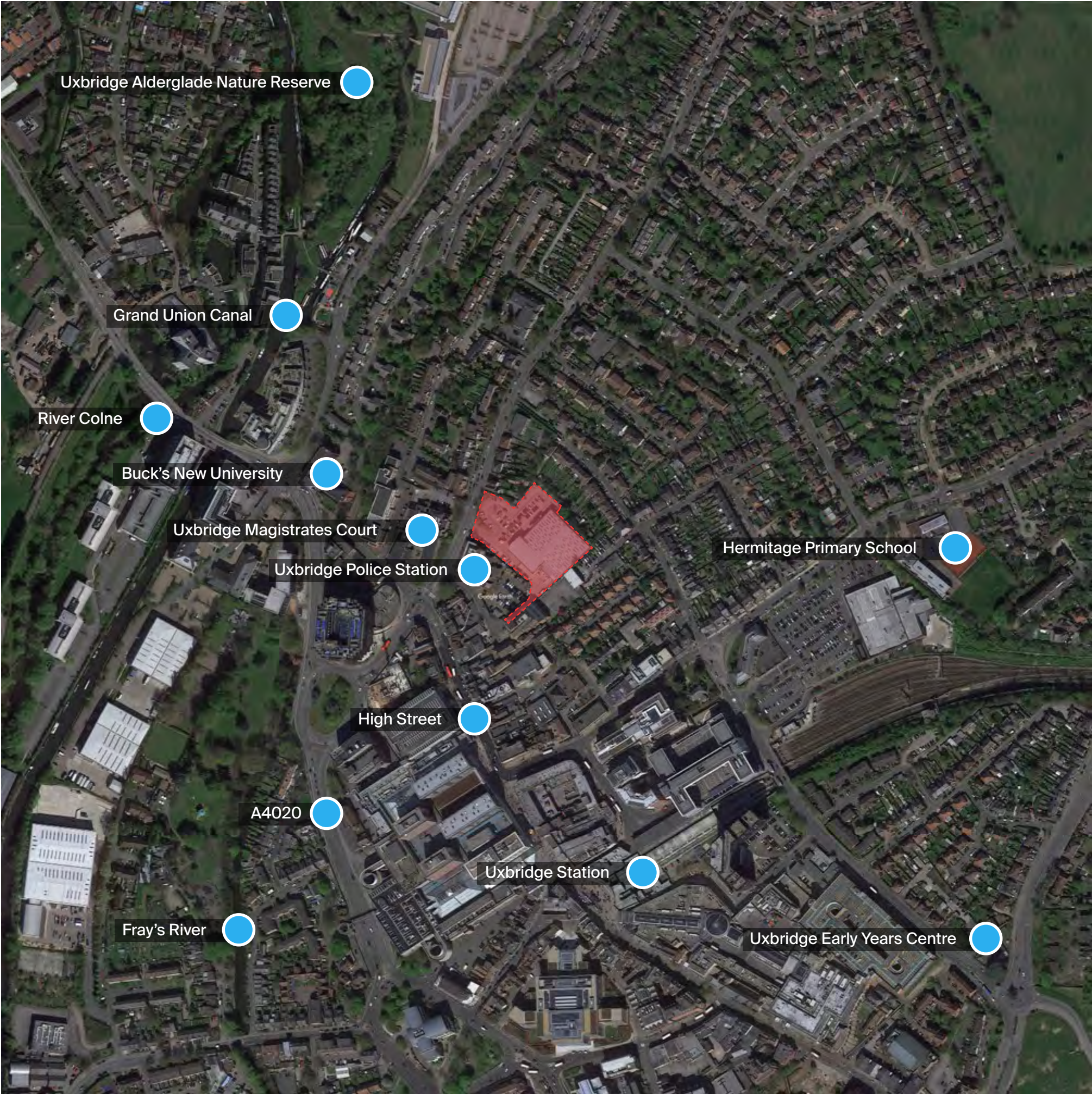


Site Context

Site Context

The site is located to the North of Uxbridge town centre immediately East of Uxbridge Magistrates' Court and North East Uxbridge Police Station.

The High Street, Uxbridge Station, Grand Union Canal and River Colne are all within 500m of the site. Its close proximity to Uxbridge Station leads the site to have a PTAL rating of 5.



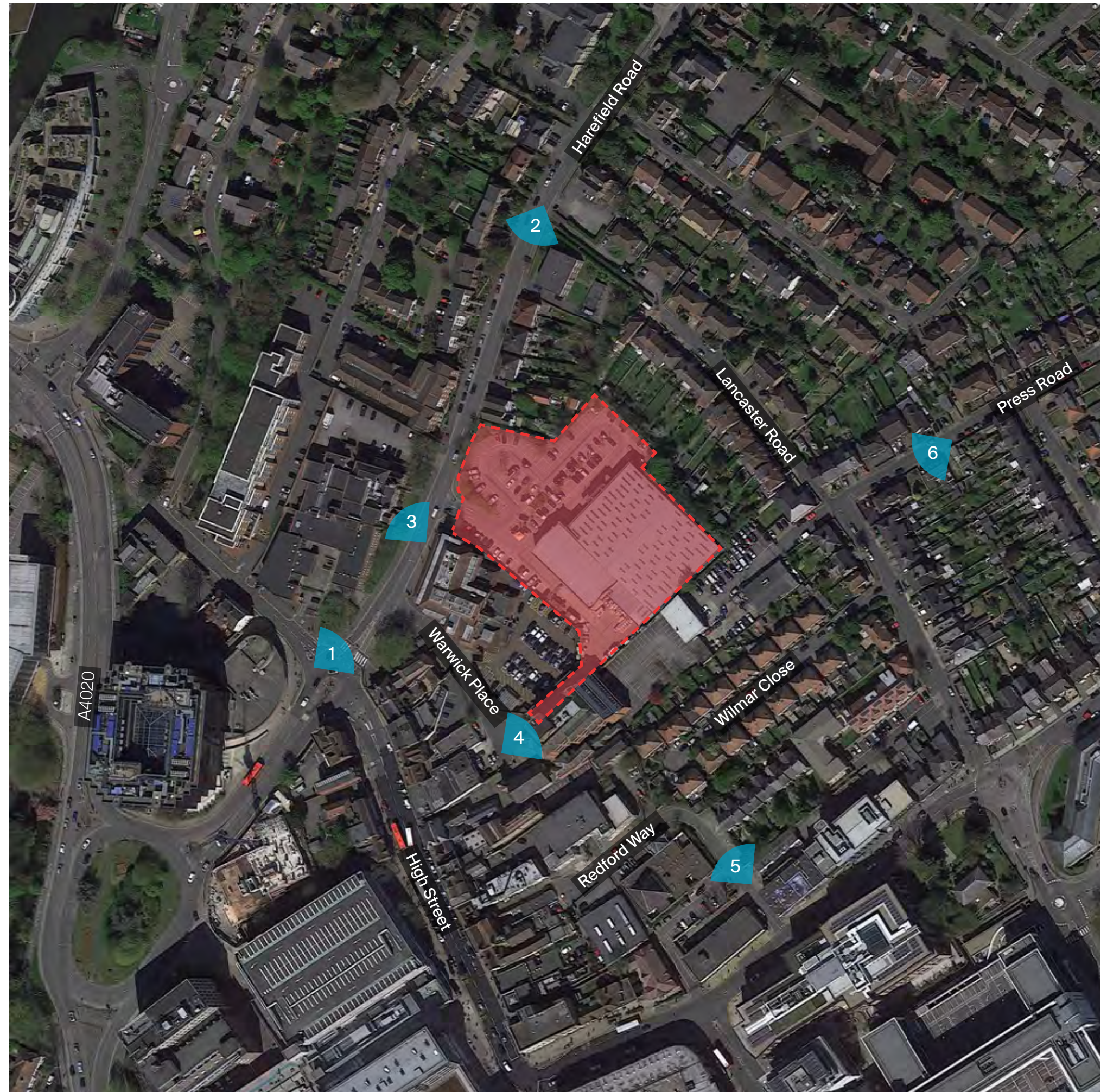
Local Context

Local Context

The 0.92Ha site fronts Harefield Road with secondary access from Warwick Place.

Harefield Road connects to the A4020 and B482 from where the M40 can be accessed.

The site is bordered by residential uses to its North and North East, light industrial and office to its East and South and civic uses to its West.



Local Context



View 1

View from junction of High Street and Harefield Road looking North East towards site and Uxbridge Police station.



View 2

View from Harefield Road looking South towards site past residential properties.



View 3

View from Harefield Road looking North towards Uxbridge Magistrates Court.



View 4

View from Warwick Place looking East towards secondary site entrance and adjacent office building.



View 5

View from Redford Way looking North towards site and adjacent office building.



View 6

View from Press Lane looking West towards site and adjacent office building.

Existing Site Plan

Existing Site

The site is currently occupied by Wickes and Halfords stores. Both are two storeys in height and are located to the East of the site with car parking occupying the West onto Harefield Road.

The site ramps up from Harefield road with a retaining wall along the street front. Several buildings are located on or within close proximity to the site boundary.

Key

- 1- Existing buildings
- 2- Primary ramped site entrance
- 3- Secondary site entrance
- 4- Retaining wall
- 5- Existing car park
- 6- Existing trees



Site Photos of Existing Buildings



View 1

View from Harefield Road showing the retaining wall at the front of the site.



View 2

View from Harefield Road showing the ramped vehicular access to the site.



View 3

View from within site of existing Halfords and Wickes buildings on site.



View 4

View from within site looking towards secondary site entrance.



View 5

View from within site looking towards southern boundary with Uxbridge Police Station.



Key

Existing Tall Buildings



The Atrium, 1 Harefield Road

The Atrium, 1 Harefield Road

The Atrium is a six storey office building with leisure facilities to ground floor. The building has recently undergone a comprehensive refurbishment to Grade A specification.

The office also offers on site cafe and break out areas as well as 25 secure car parking spaces.



Pavilions Shopping Centre, 18 Chequers Square

Pavilions Shopping Centre, 18 Checkers Square

Opened in 1973 and refurbished in 1985 Pavilions Shopping Centre sits in the same location as the historic Uxbridge Market.

The building consists of two stories of retail with between five and nine levels of residential above arranged in five slab massing blocks. The development also have two five storey car parks.



Enterprises House, 2 Bakers Road

Enterprises House, 2 Bakers Road

Enterprises House comprises of a comprehensively refurbished and extended Grade A office space adjacent to Uxbridge train station. The office sits above Uxbridge Bus Station and is arranged over six floors providing a total floor area of 122,983 sq ft.

Emerging Tall Buildings



61 High Street

61 High Street

61 High Street was approved in August 2014 and is a residential lead mixed-use development, comprising a total of 48 new residential apartments (twelve 1-bed, thirty three 2-bed and three 3- bed) within a part four, part seven, part eight storey building with three distinct but coherent elements arranged alongside Harefield Road and Oxford Road roundabout. The scheme also provides a replacement community dining hall with a combined 300m² of modern floorspace flexibly designed and capable of accommodating a full range of compatible community uses and activities.



1-3 Bakers Road

1-3 Bakers Road

1-3 Bakers Road was granted planning initially in July 2011 and proposes the erection of a 9 storey block to provide 37 residential units, comprising 8 one bedroom (including 6 wheelchair units), 28 two bedroom and 1 three bedroom, together with 245sqm of retail floor space at ground level, a 135sqm gym, associated parking and landscaping, involving demolition of existing buildings. The proposal includes parking for a van and a disabled parking bay, 37 secure cycle spaces and bin stores.

Key Planning Policy

The Hillingdon Local Plan: Part 1 - Strategic Policies

Uxbridge has been identified as an area for Economic growth within The Hillingdon Local Plan and estimates that 754 new homes will be delivered from large sites in Uxbridge north and Uxbridge south.

Policy H1: Housing Growth

The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

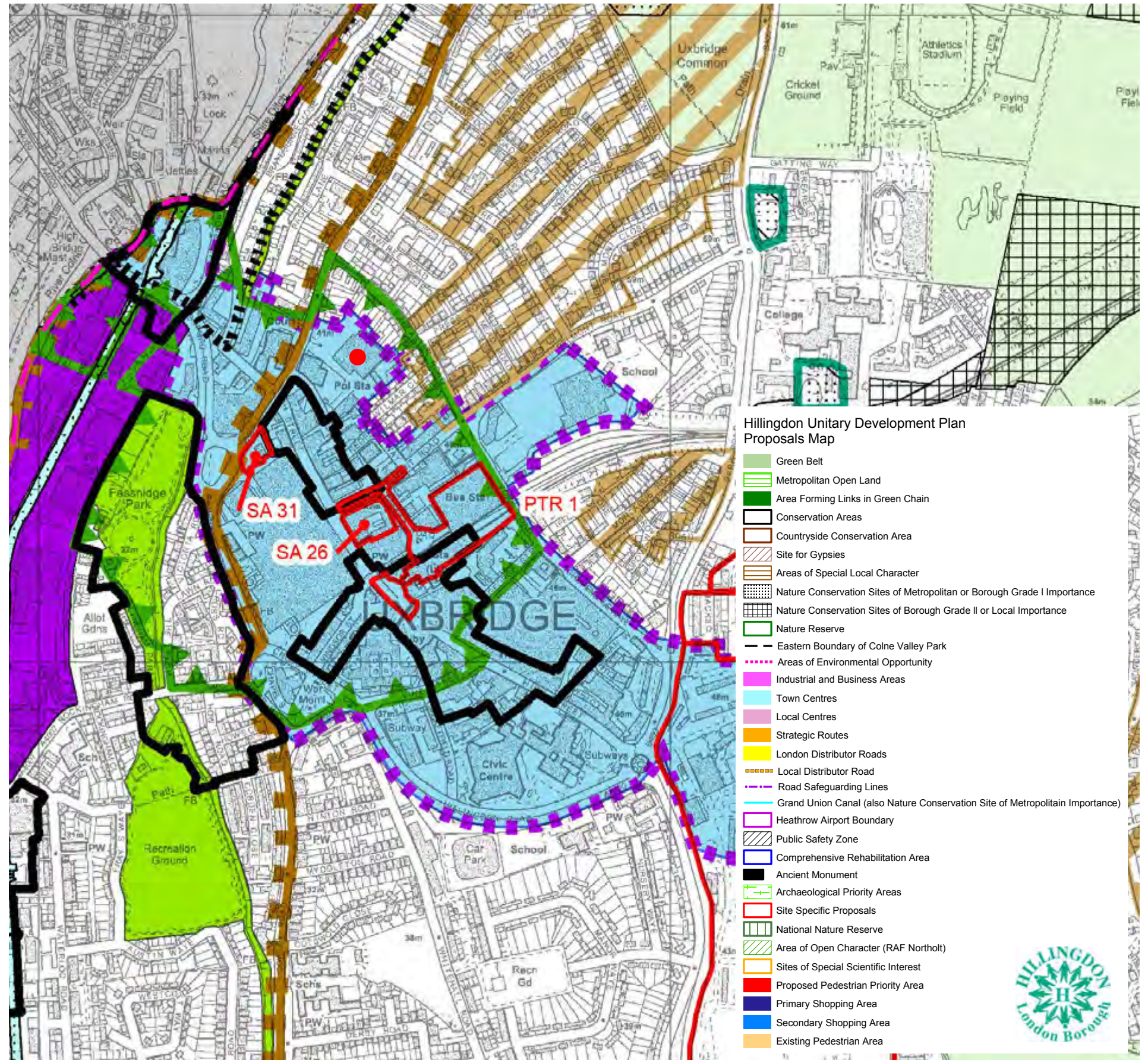
The borough's current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021.

Rolled forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. Sites that will contribute to the achievement of this target will be identified in the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document (LDD).

Policy H2: Affordable Housing

Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.

● Site Location



Hillingdon Development Proposals Map

Key Planning Policy

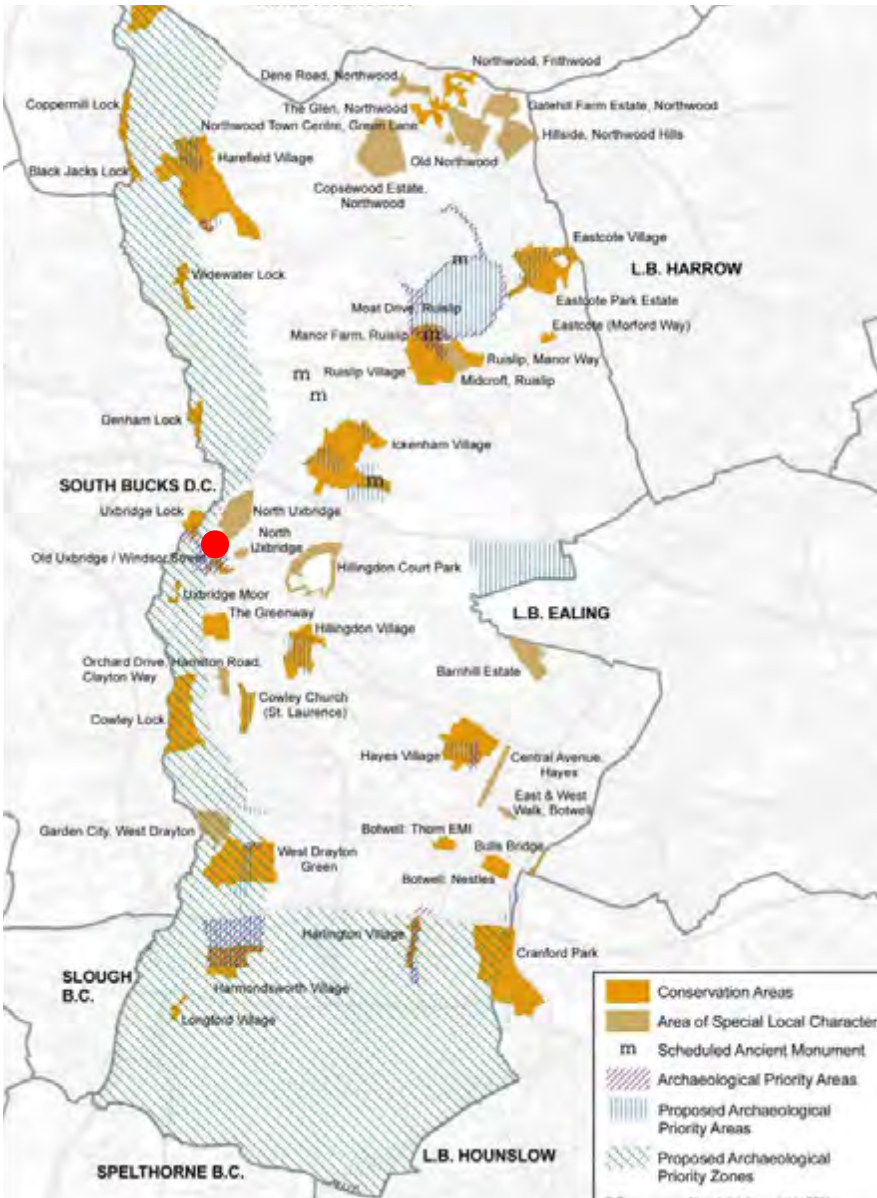
Conservation Areas and Listed Buildings

The Hillingdon Local Plan seeks to conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design.

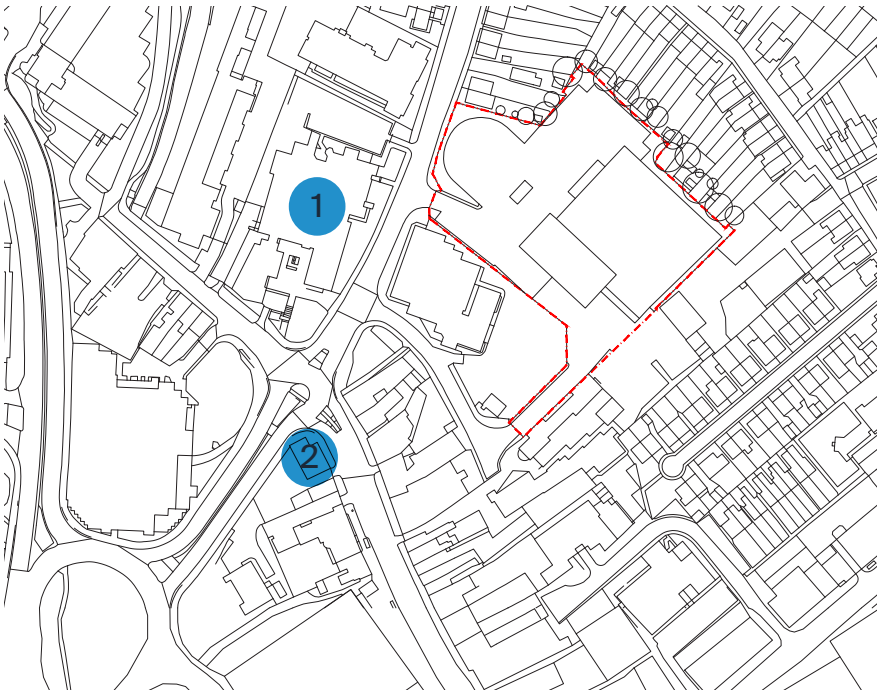
The Harefield Road site is located outside the Uxbridge conservation area and area of special local character but inside an area of archaeological priority.

Areas of archaeological priority are those with particular archaeological importance or vulnerability in the Borough which have been identified by the Council with the advice of English Heritage. In Archaeological Priority Areas (APAs) these areas the Council's policies and proposals for archaeological sites will apply. Advice from the Greater London Archaeological Advisory Service will be sought in planning applications affecting such areas and further research and site investigation may be required.

Uxbridge Magistrates Court is a listed building while Fountains Mill Younger Persons Centre is locally listed. Both buildings are in close proximity to the site. The Magistrates Court which dates to 1907 sits opposite the site on Harefield Road.



● Site Location Hillingdon Heritage Map



Locally Listed Buildings



1 : Uxbridge Magistrates Court



2 : Fountains Mill Young Persons Centre

Character Study

Hillingdon Townscape Character Study

Section 5 of the Hillingdon Townscape Character Study assesses the locations within the borough of Hillingdon most appropriate for tall buildings.

The current local policy position on tall buildings is outlined in the Hillingdon Local Plan, and indicates that tall buildings may be appropriate in some locations within Uxbridge and Hayes town centres. These are still considered to be the most appropriate locations for any future tall or taller buildings due to their high accessibility and because there may be locations within these areas where new tall buildings could be constructed without compromising the local character.

The character study draws the following analysis and conclusions

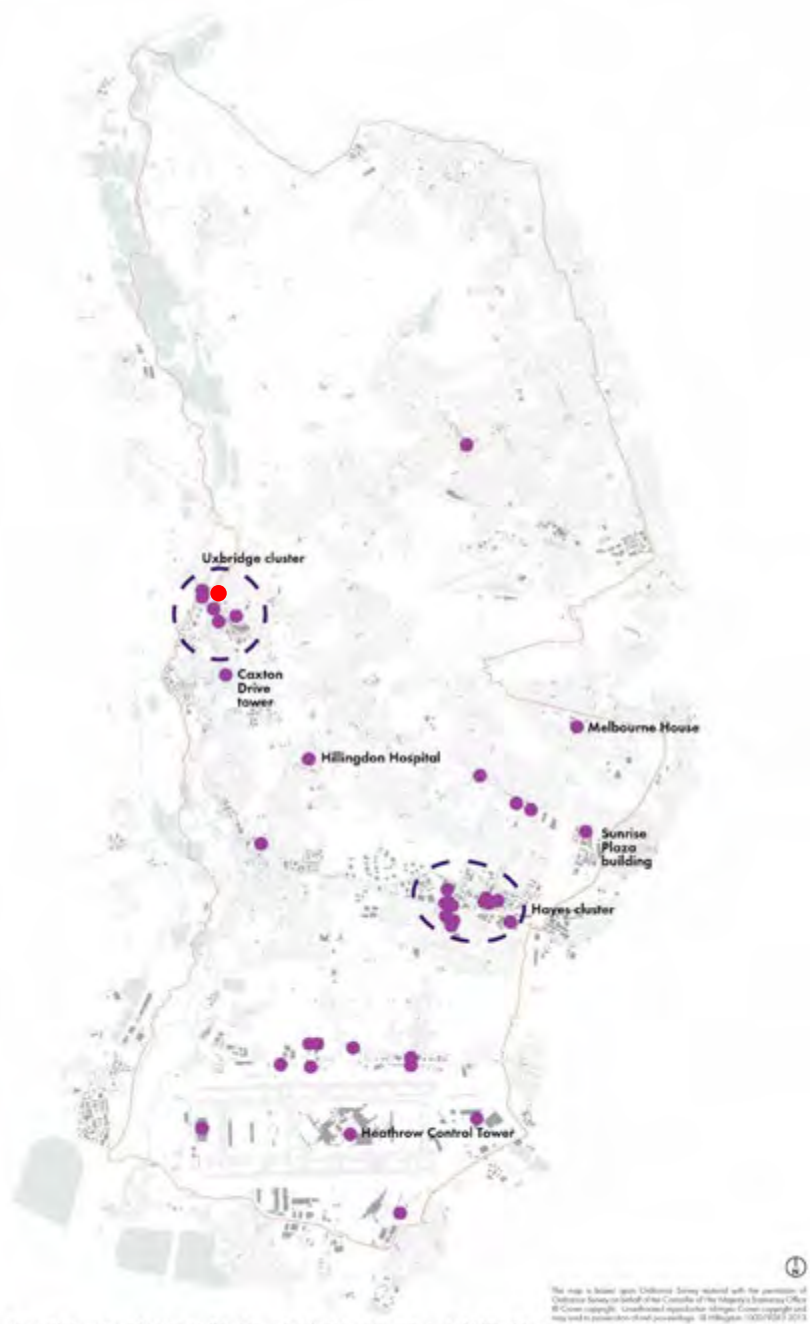


Figure 42: Location of existing tall buildings, highlighting where clusters of tall buildings

Hillingdon Townscape Character Study | FINAL REPORT | November 2013 89

Site Location ●

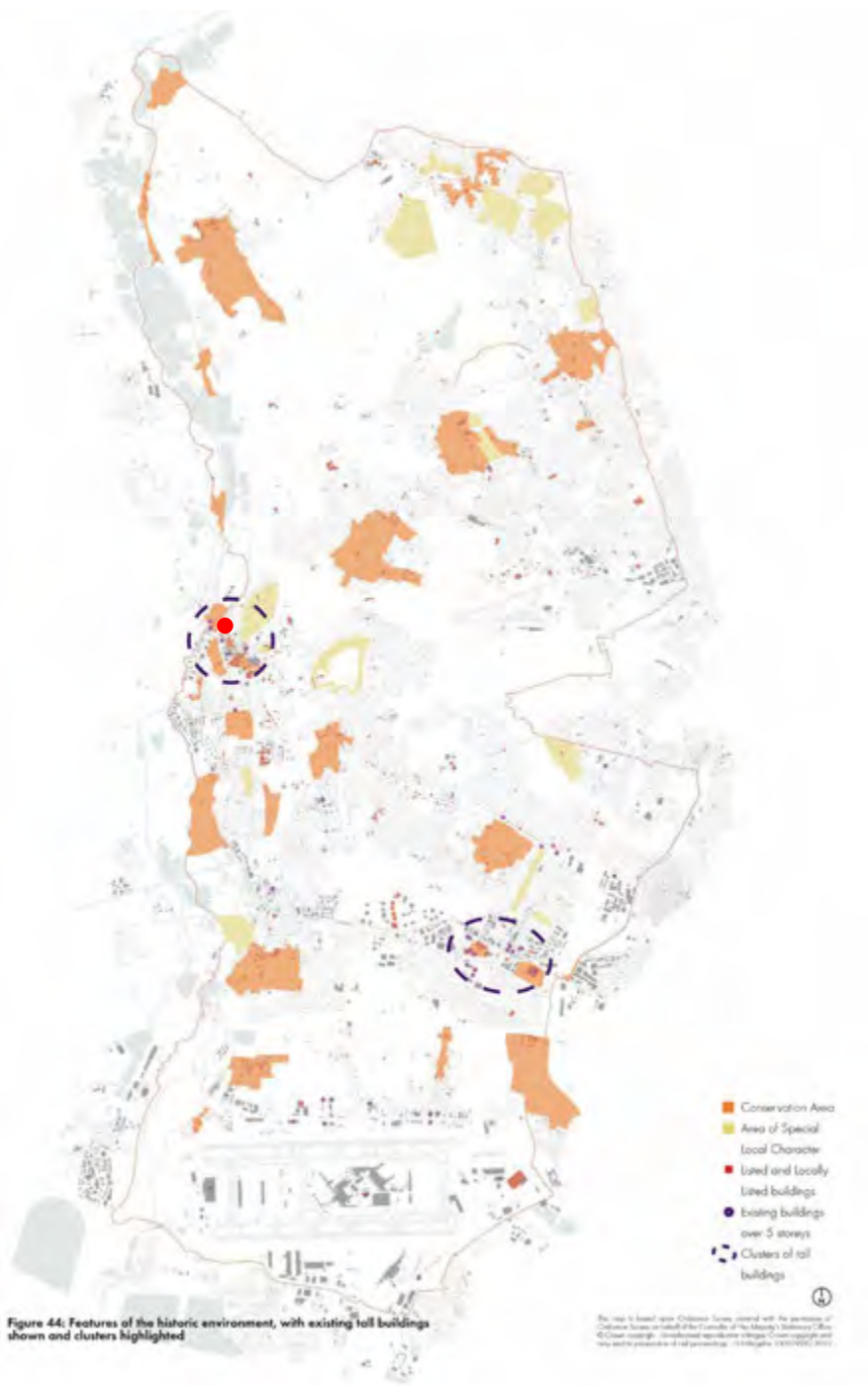
Location of Existing Tall Buildings in Uxbridge

In the site's surrounding context there is currently a cluster of tall buildings which help to contribute to the variety and interest of the architecture of the town centre.

● Site Location



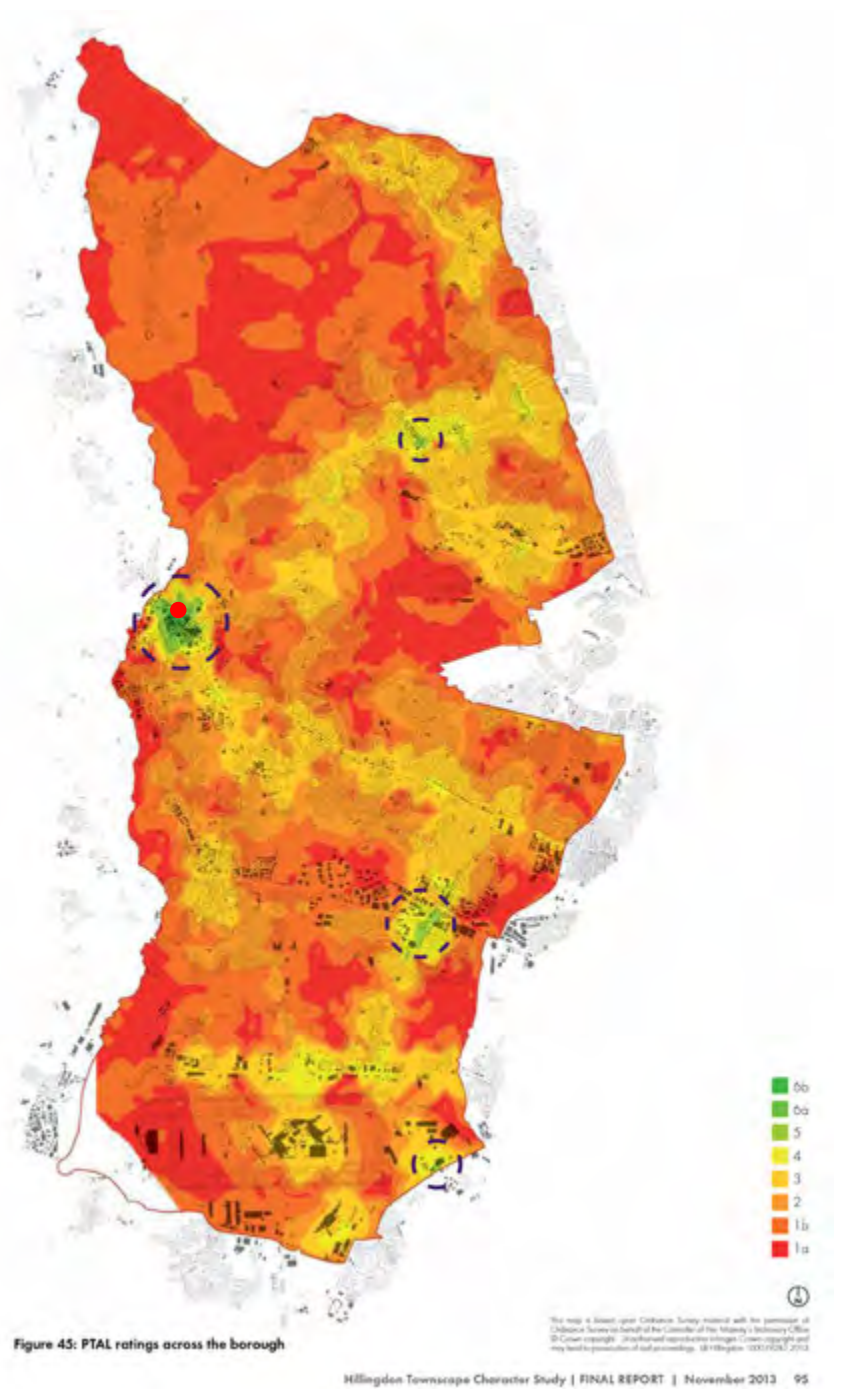
Character Study



Site Location ●

Historic Environment with Existing Tall Buildings

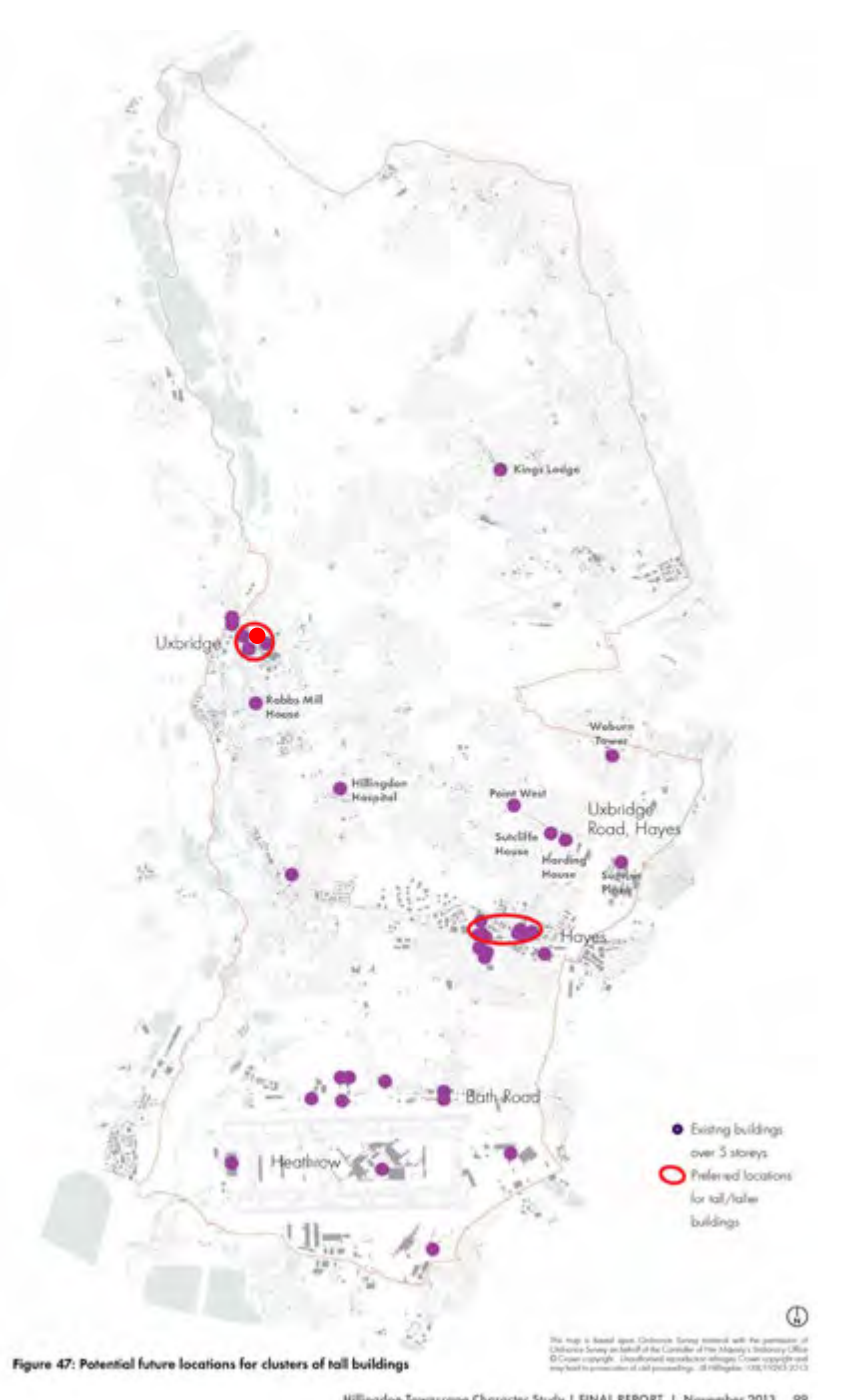
Hillingdon has a wealth of built heritage, with a number of historic centres. In some of these centres, tall buildings now sit almost adjacent to historic fine grain streets.



Site Location ●

PTAL Rating and Location of Existing Tall Buildings

Tall buildings are capable of delivering a high population density which is best associated with good easy access to shops and services and good quality public transport links.' The site sits within PTAL 5 in an area of high public transport accessibility.



Site Location ●

Future Locations for Tall Buildings

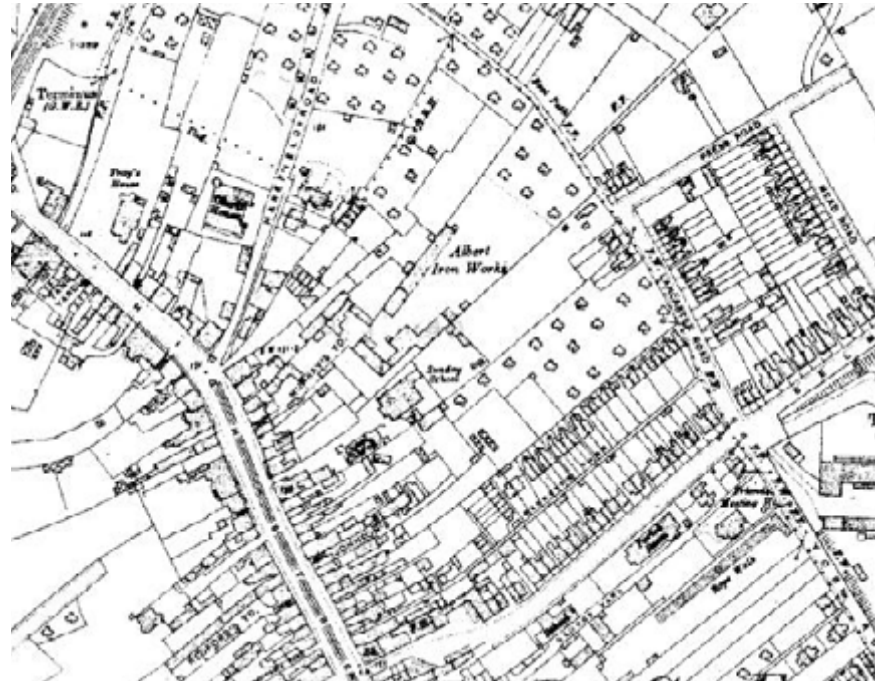
The analysis suggests that buildings of more than seven or eight storeys should be limited to Uxbridge town centre and Hayes town centre. These two locations are appropriate in terms of accessibility and already have a number of taller buildings.

Site History



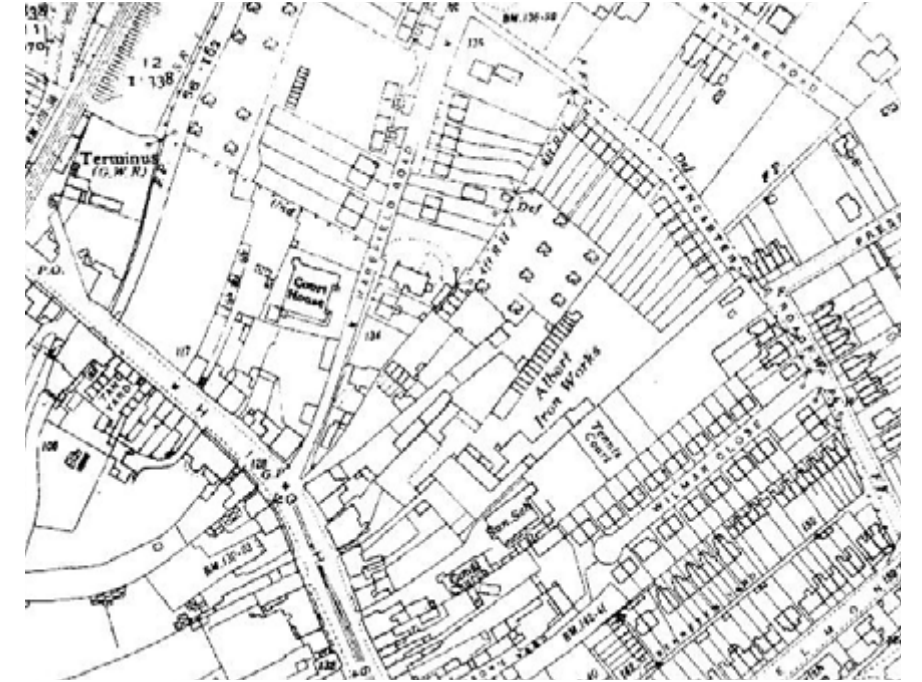
1870

Albert Iron Works to the south of the site, agriculture to the north.



1910

Residential developments appear to the East and South, Magistrates Court erected on Harefield Road. Residential property on site.



1930

Residential properties begin to appear on the site and to its north along Harefield Road



1970

Albert Iron Works is demolished, Harefield Road gains more residential properties and warehouses appear on site.



1999

Uxbridge Police Station and The Atrium are erected.

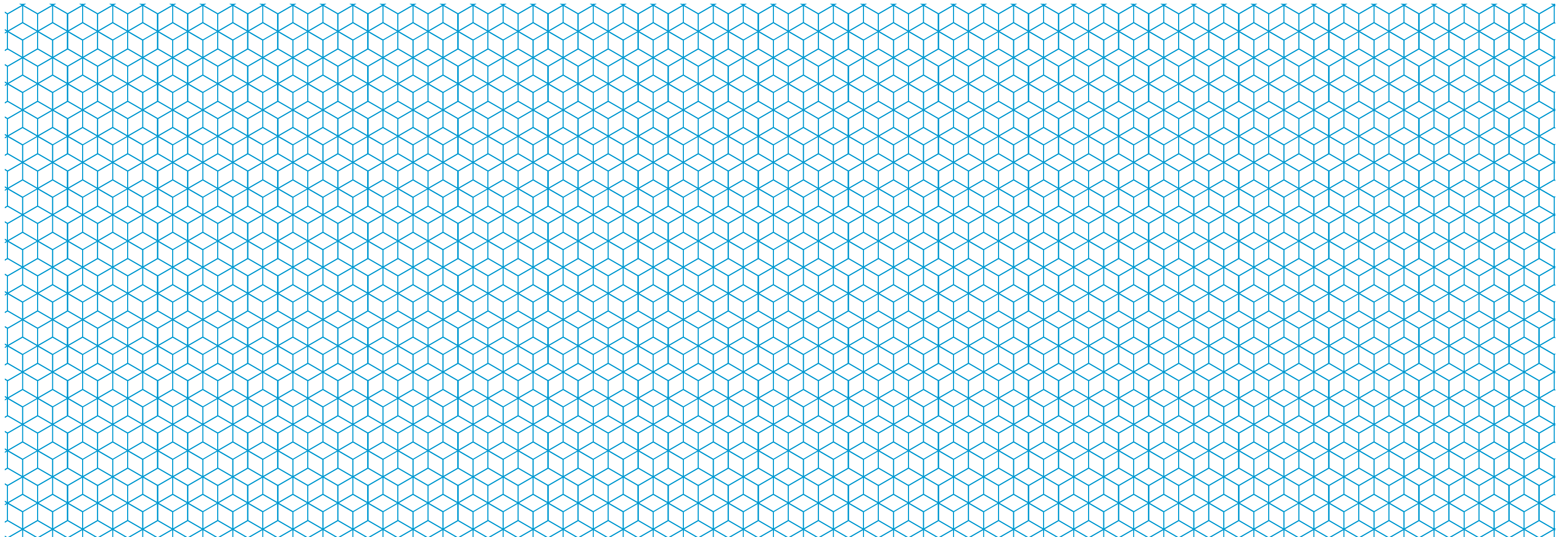


2017

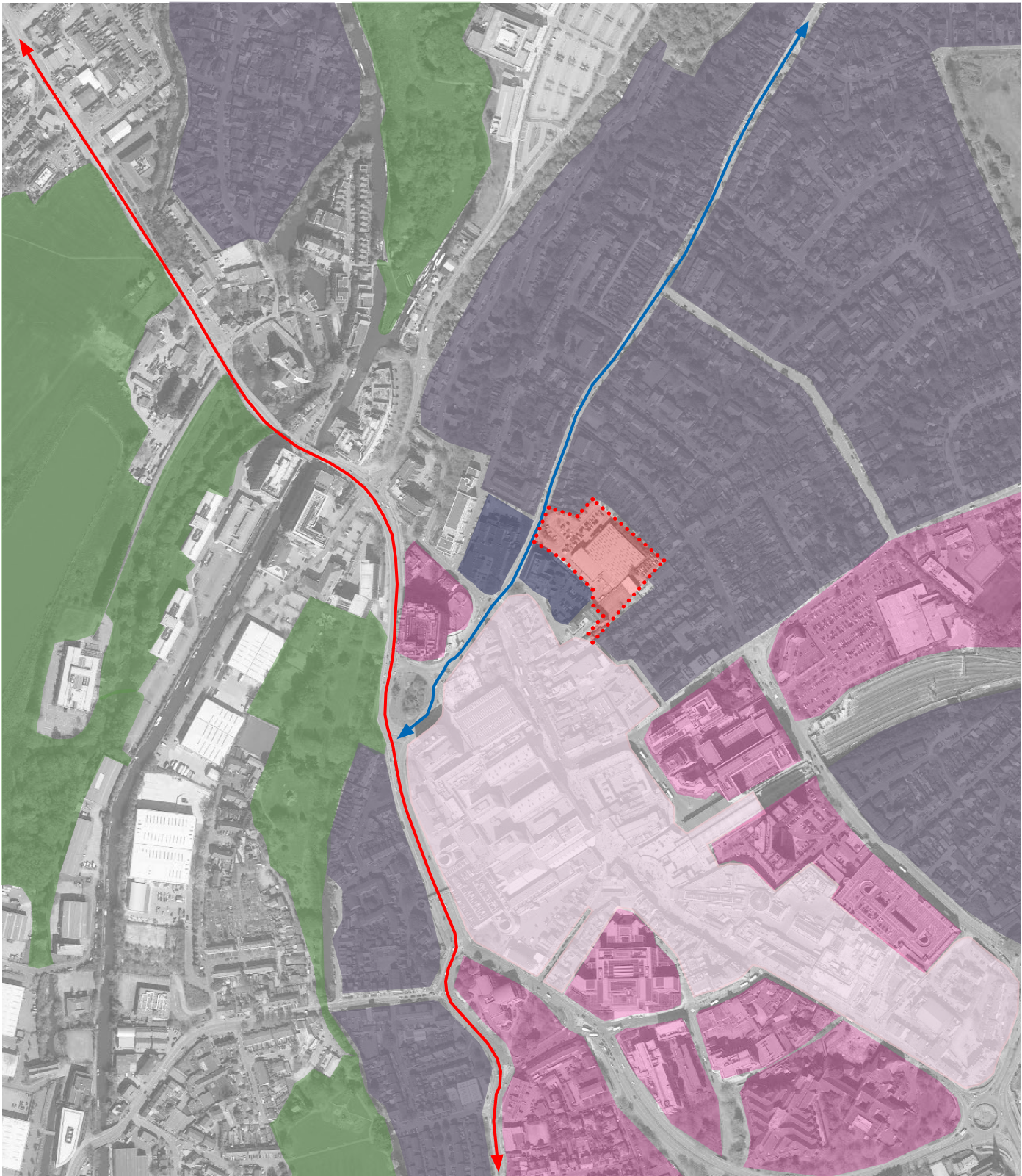
Current site.

02

Analysis

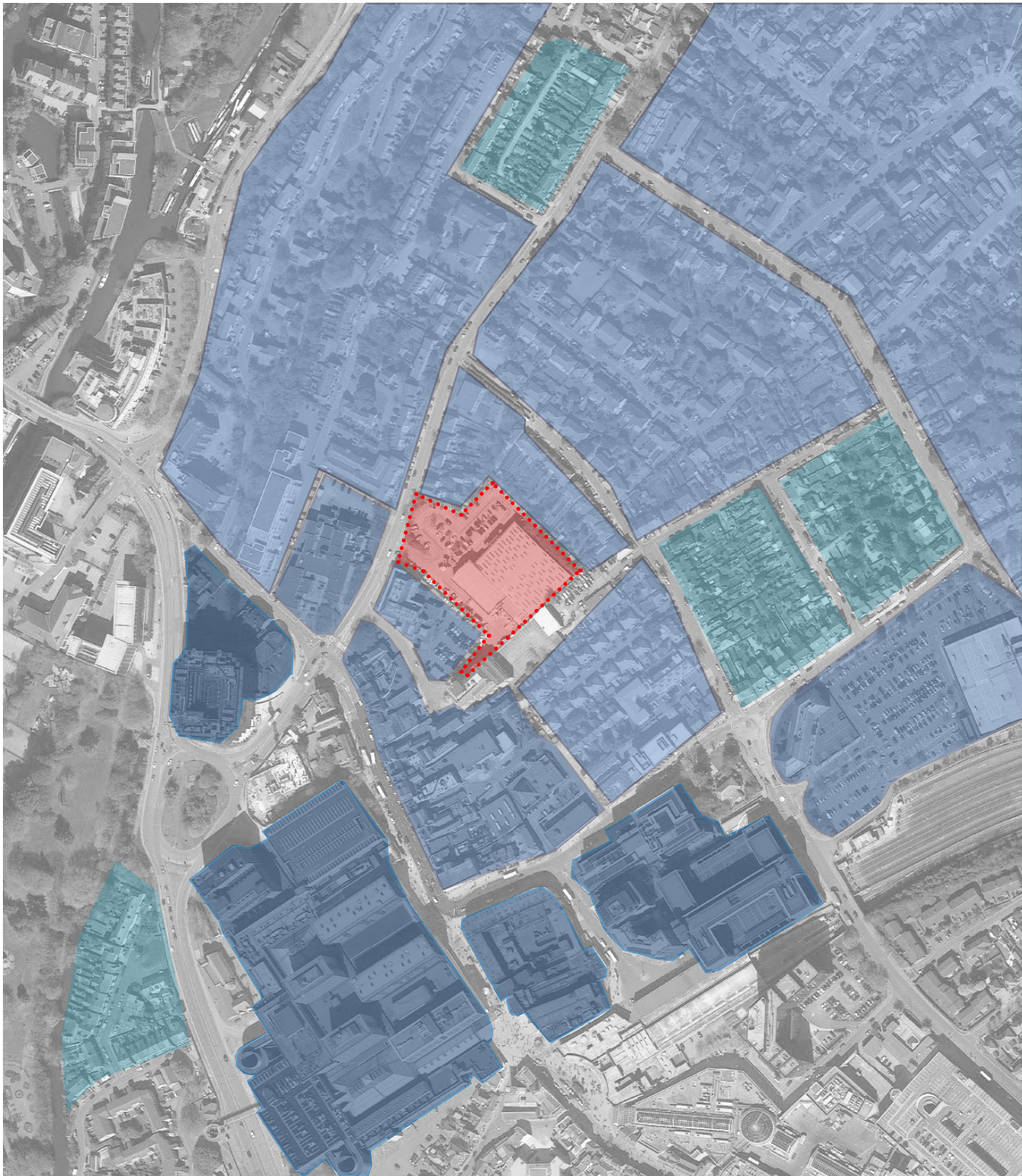


Wider Site Analysis



Character of Wider Area

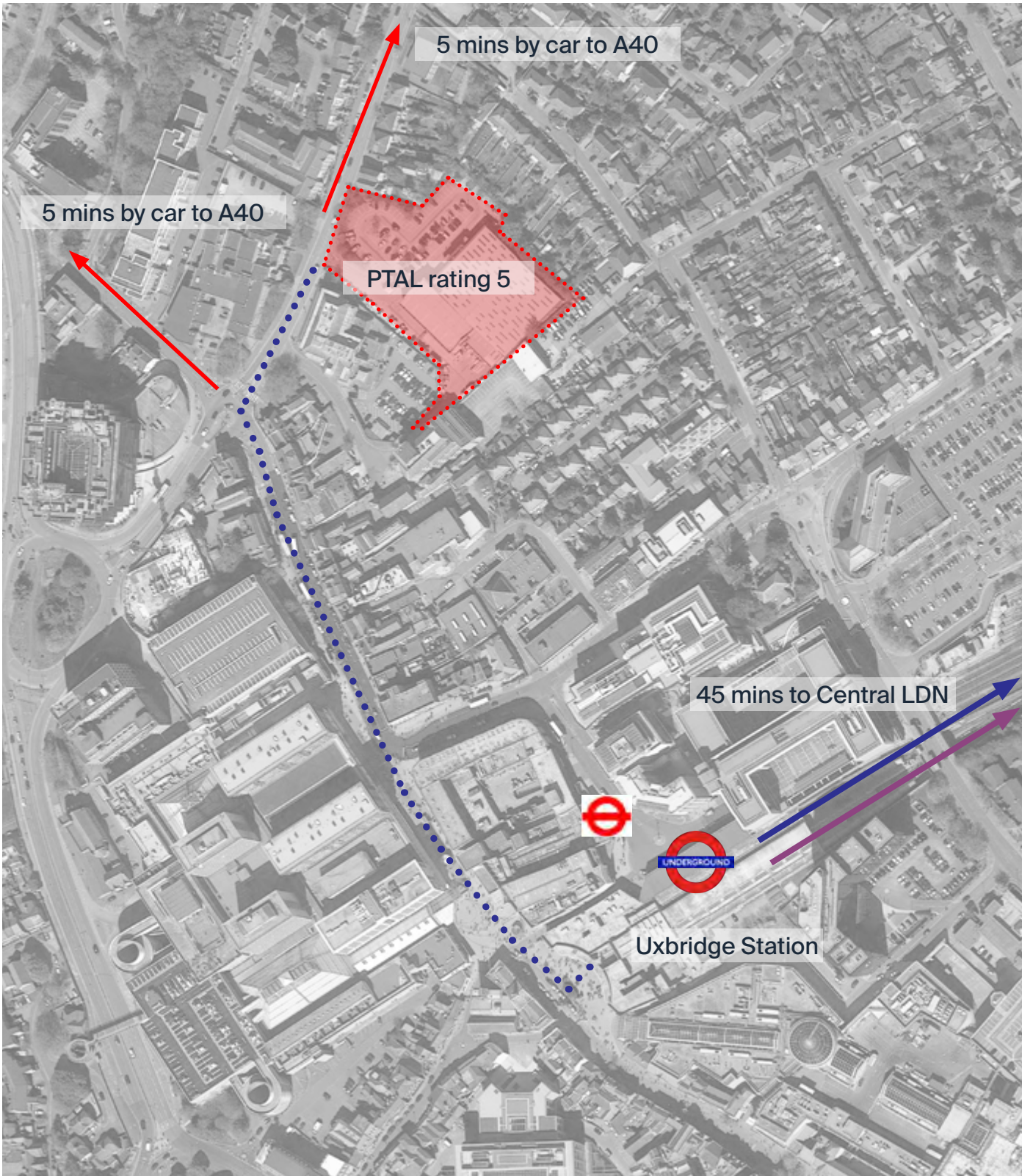
- Parkland/Reserve
- Town centre urban character
- Primary vehicular route
- Civic character
- Low rise residential character
- Secondary vehicular route
- Urban character
- Proposed site



Urban Grain

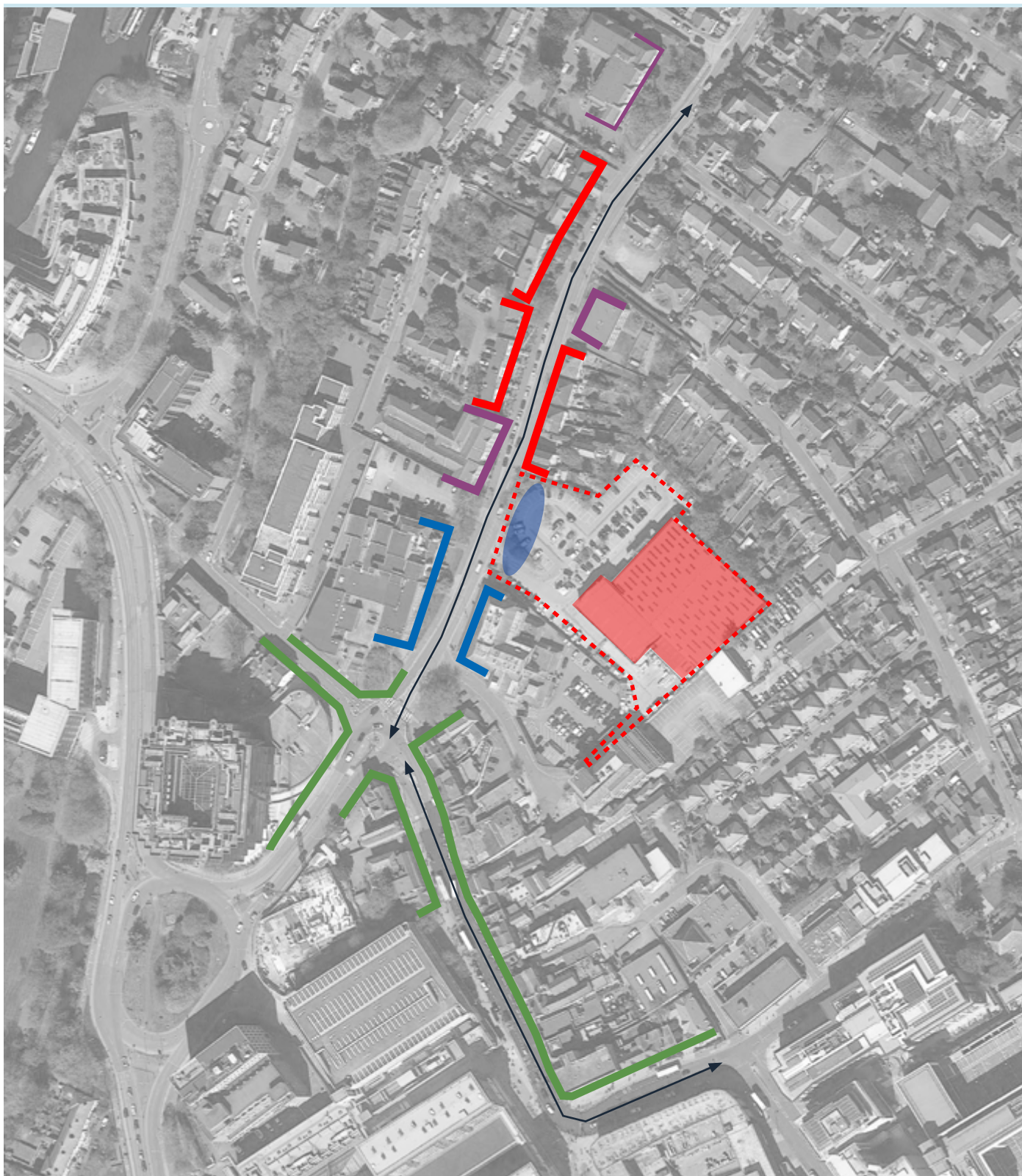
- Large urban blocks lacking pattern
- Mid scale urban blocks lacking pattern
- Regular residential grain with pattern
- Fine, tight residential grain with pattern
- Proposed site

Wider Site Analysis



Transport

- Uxbridge Station
- Metropolitan line to central LDN (45mins)
- Piccadilly line to central LDN (1hr)
- Proposed site
- 6 minute walk
- Bus/coach station

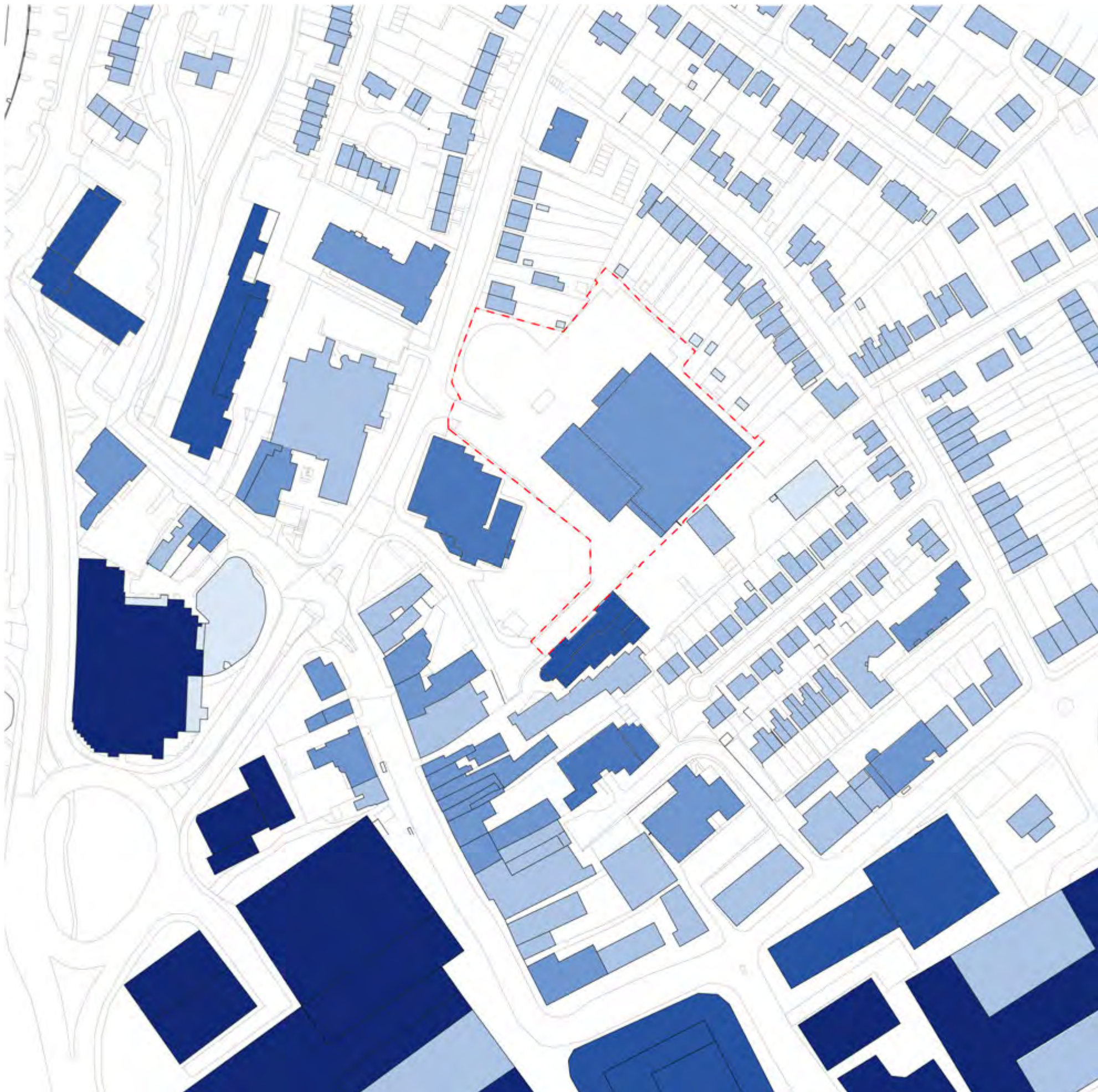


Street Frontages

- Proposed site with existing building inset
- High street frontage
- Terraced residential frontage
- Civic street frontage
- Residential frontage
- Gap in existing street frontage pattern
- Key road axes



Building Heights



Building Heights Diagram

Land Uses

Key

Residential

Civic

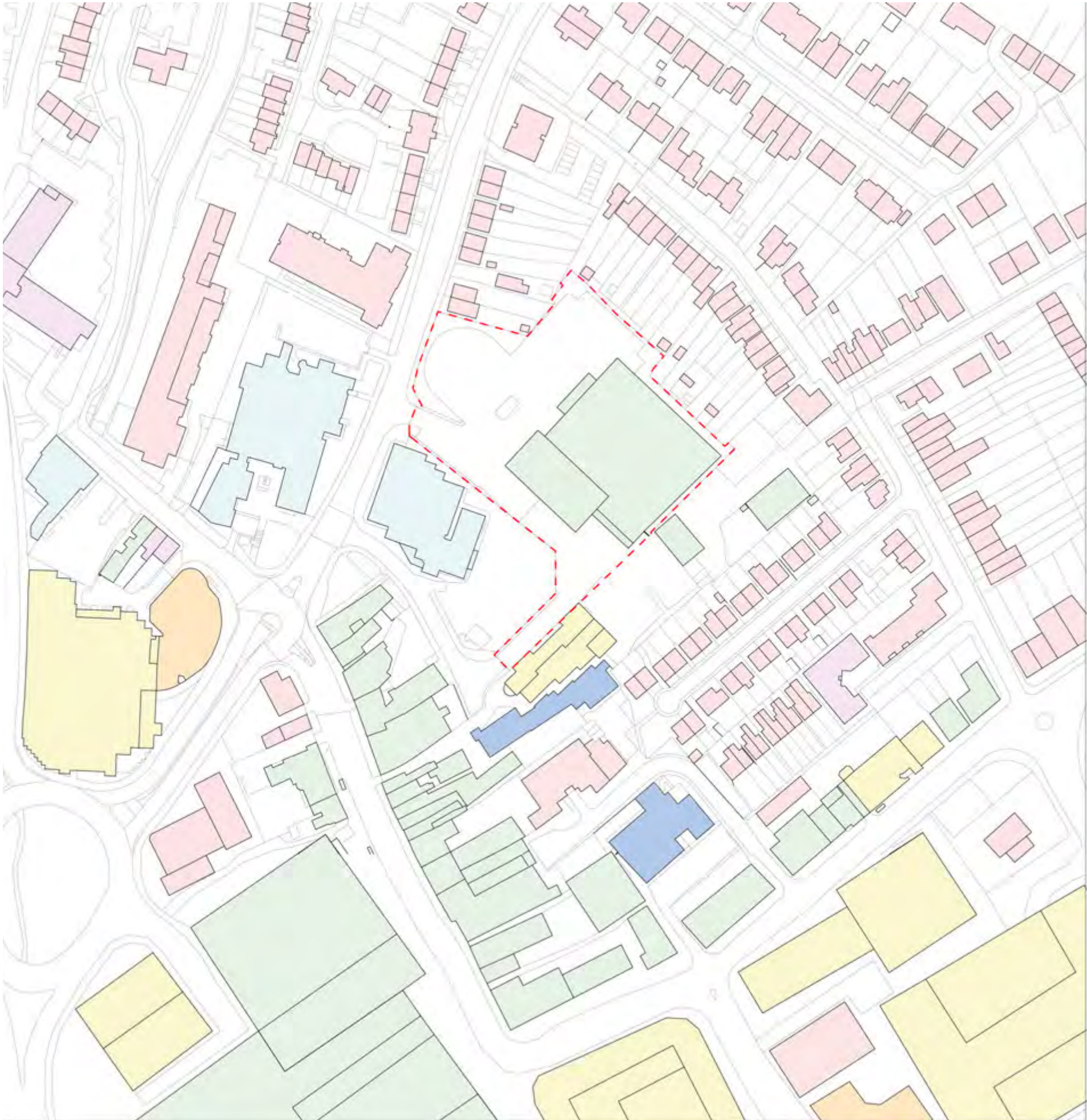
Commercial

Leisure

Office

Education

Religious



Site Analysis

Constraints



Sun path



Primary vehicular routes



Secondary vehicular routes



Primary site access



Secondary site access



Ramp up to site from Harefield Road



Retaining wall to Harefield Road



Existing trees



Adjacent building elevations with windows within 20m of site boundary



Listed building



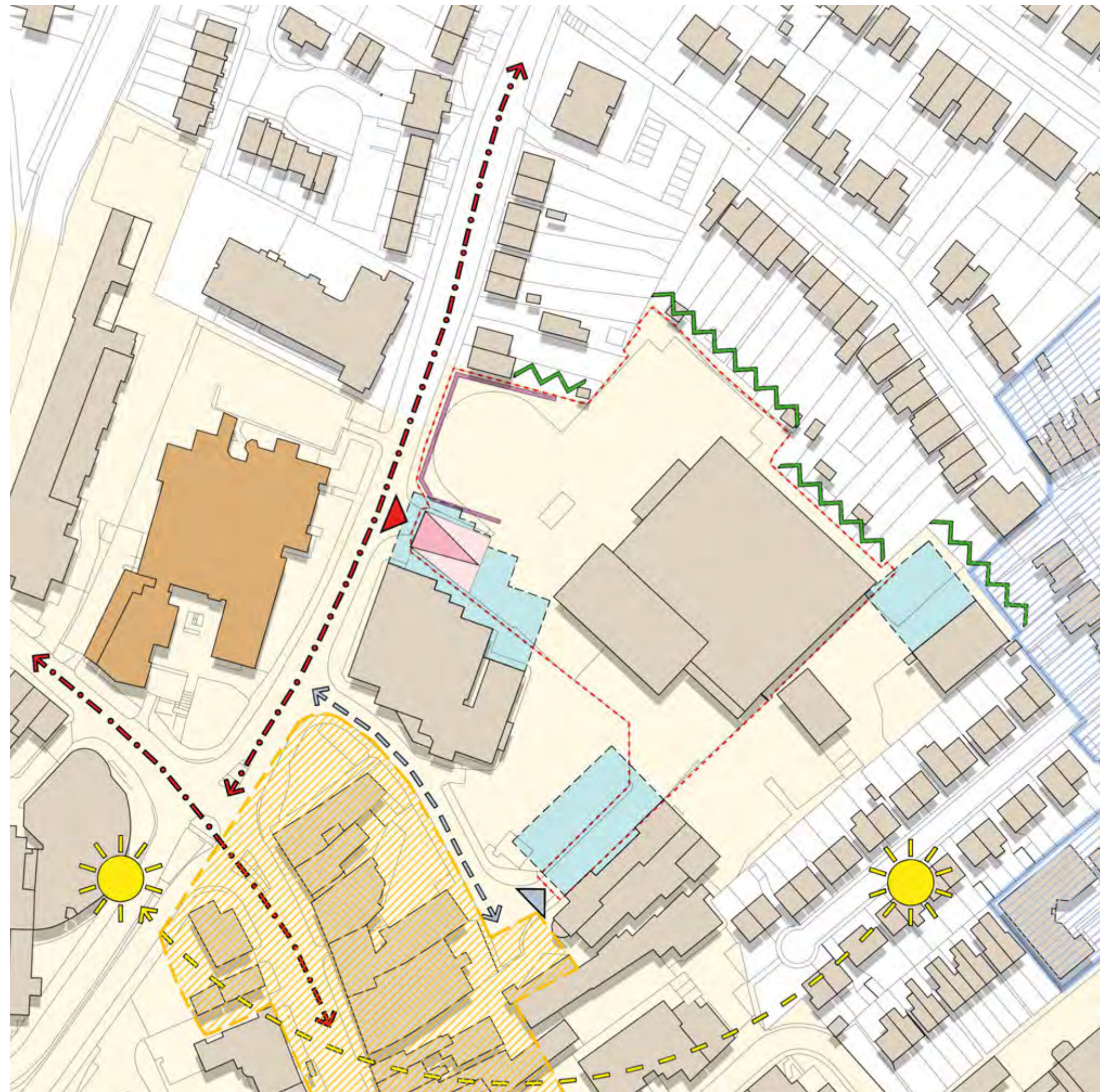
Conservation Area and secondary shopping district



Area of special local character








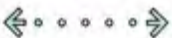








Archaeological priority zone

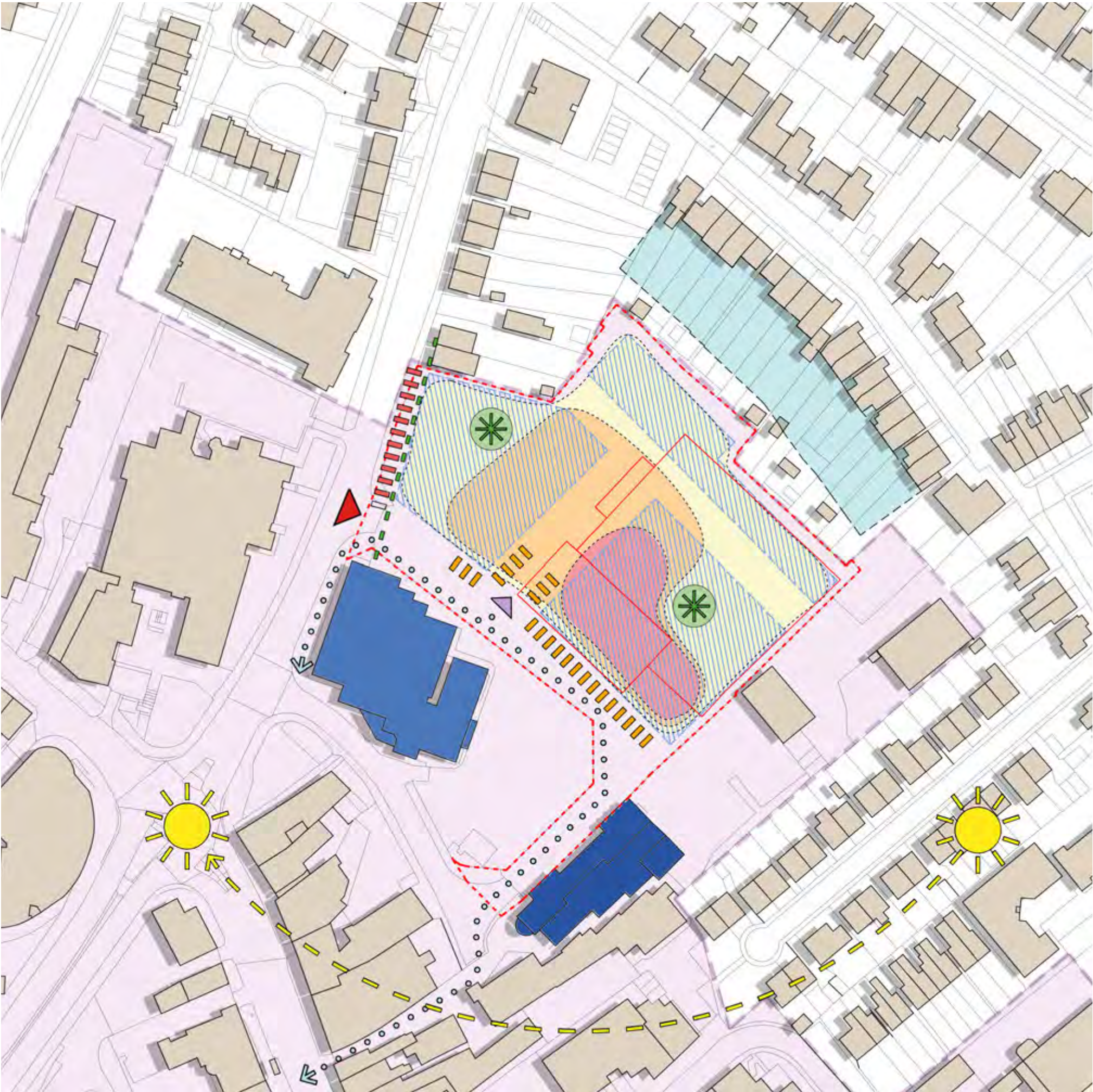


Site Constraints Diagram

Site Analysis

Opportunities

-  Sun path
-  Uxbridge Town Centre
-  Height sensitive to non-sensitive areas of site
-  Building plot outlines
-  Amenity space
-  Pedestrian access
-  Active frontage (commercial)
-  Active frontage (residential)
-  Maintain site access off Harefield Road
-  One point a access to development
-  Maintain building line
-  Five storeys
-  Four storeys
-  20m overlooking distance from adjacent properties to North



Site Opportunities Diagram

Massing Opportunity

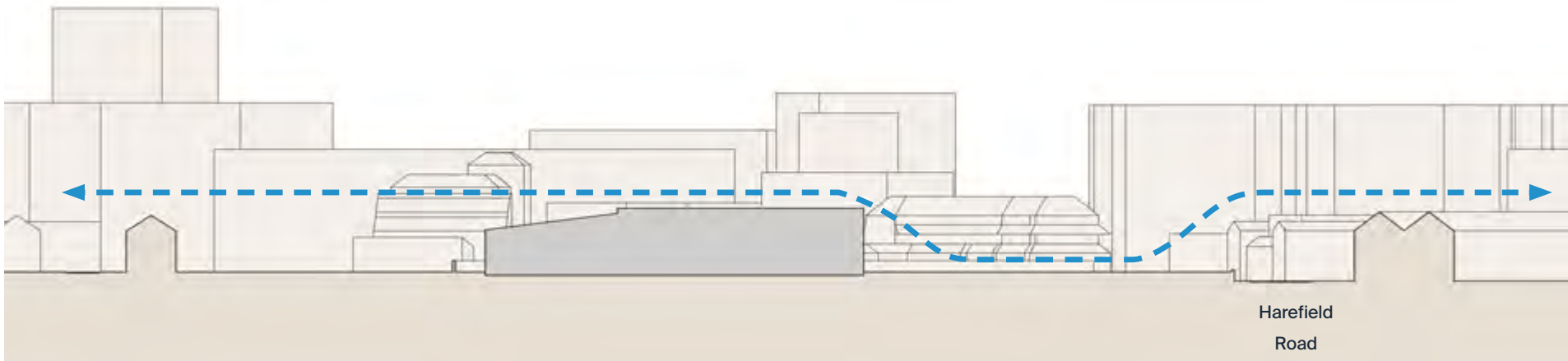
Massing Opportunity

Car parking currently occupies the North Western area of the site with the existing buildings located to the South East. This creates a void in the urban grain and a break in the street frontages to Harefield Road.

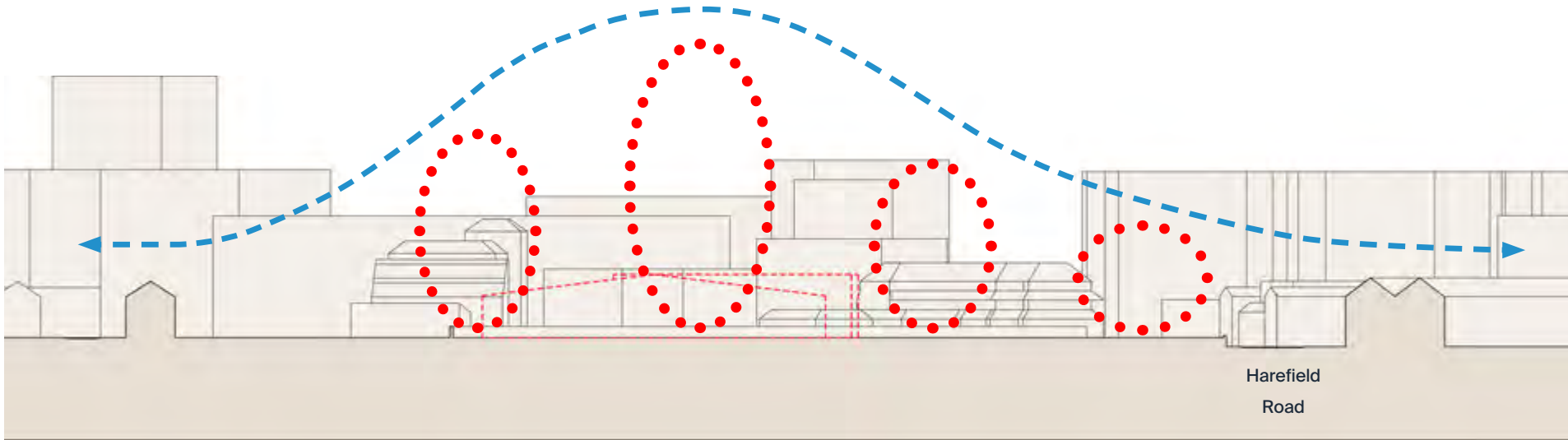
By reinstating the street frontage along the existing building line of Harefield Road an opportunity arises to create an element of taller massing within the centre of the site. This taller element can be offset with lower massing to its North West and South East to create a harmonious height progression across the site in fitting with the existing context.



Key



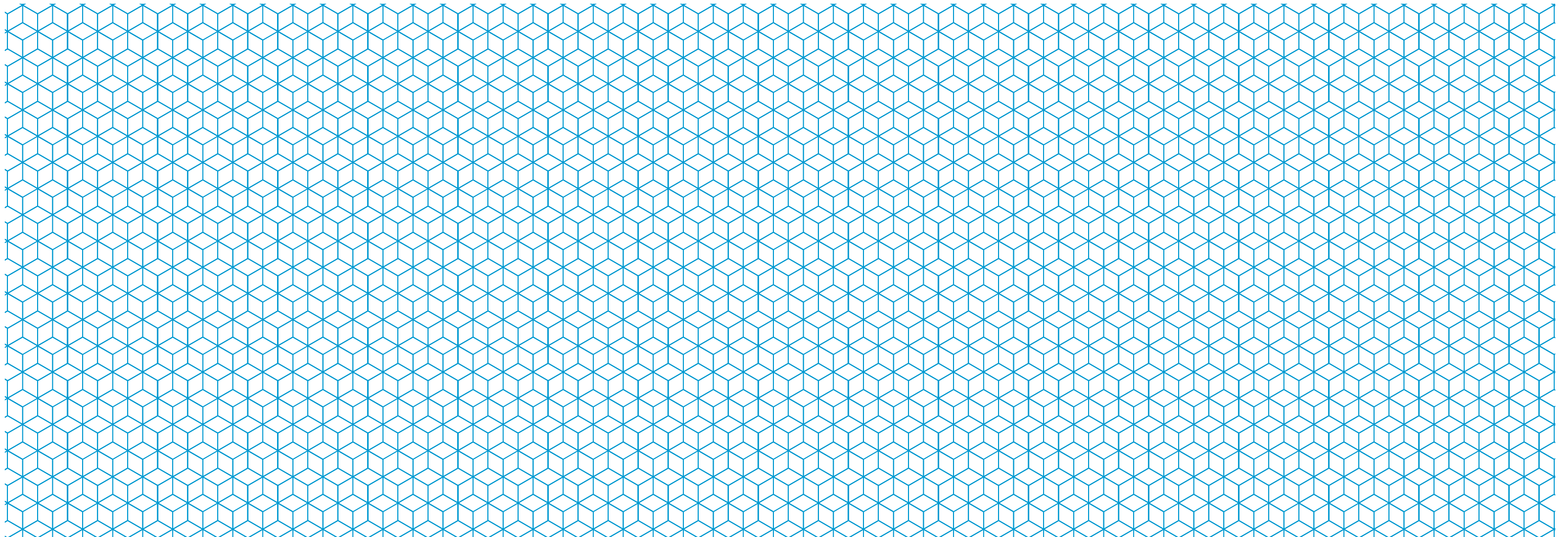
Existing Site Section



Massing Opportunity Site Section

03

Evolution



Design Response

Design Approach

Following the receipt of Hillingdon Council’s Design Officer on the 25th of October 2017 we take on board the comments made and propose a number of alterations to the massing approach for the site.

These take into account the buildings’ alignments, height distribution, the immediate built environment and also the wider context.

The diagrams on this and the facing page illustrate our high level approach to the revised massing. The following chapter illustrates three massing options as a result of these considerations.

Street Alignment along Harefield Road

Along the eastern site boundary we propose to follow the building line established by the adjacent residential building to the north which retains the green “buffer zone” along Harefield Road.


This helps to retain the character of the street opposite the locally listed building and also retain a line of trees along the road. At the same time the set back building line closes the gap in the street frontage and creates a stronger and more coherent townscape.

Pedestrian Connections to the Hight Street and across the Site

The new development creates the opportunity to improve the pedestrian permeability across the site and link with the High Street through the little Beasley Yard passageway. An improved public realm and landscaping along the southern tip of the site improves the quality of the route.

A local destination within the development such as a nursery / crèche or a small community hall could create a destination and encourage local residents to take up this route.

The route connects through to Harefield route along the southern site boundary, giving a new vista of the locally listed Magistrates court.



CONSERVATION AND URBAN DESIGN OBSERVATIONS

Officer: James McClean Smith
Site: 10-12 Harefield Road, Uxbridge
Ref: 16298PRC20171145

PROPOSAL: Demolition of existing buildings including clearance of site, and development of 302 apartments with ground floor commercial floor space comprising flexible uses (Class A1, Class A2, Class A3, Class B1, Class D1, Class D2) along with associated landscaping, car parks and other associated works.

BACKGROUND: The site is located within the Uxbridge Town Centre designated area, off the main High Street along Harefield Road. It is situated between the Old Uxbridge/Windsor Street Conservation Area and North Uxbridge Area of Special Local Character (ASLC). Whilst the site is not directly within the Conservation Area or ASLC, the proposed development is considered in regards to development on the fringes of the Conservation Area. The site is located within the Uxbridge Archaeological Priority Area (APA) therefore the Greater London Archaeological Advisory Service (GLAAS) would need to be consulted in relation to any formal application. Opposite the site is the Locally Listed Uxbridge Magistrate's Court, therefore the setting of this heritage asset would need to be carefully considered.

The site can be accessed off Harefield Road and from Warwick Place to the rear of Uxbridge Police Station (south of the site). It is currently occupied by 2 commercial units (Haffnith and Wicks) with a rear service yard. The existing buildings on the site are substantially set back from the road allowing for a relief and buffer within the street scene between the varying character areas. The streetscape along Harefield Road dramatically changes from predominantly town centre character in character to predominantly residential, comprising of 2-storey residential dwellings. The set back of the existing buildings on the site and the presence of mature trees, planting and greenery provides relief along the road and softens the transition of the road into a residential suburban character area.

The road itself rises going north towards Park Road. The ground levels within the site also differ, with the bulk of the site sitting higher than the road. There is a retaining wall bordering onto Harefield Road.

COMMENTS: The proposal includes the demolition of the existing structures to be replaced with a residential development of 302 units with a commercial unit at ground floor facing onto Harefield Road.

the periphery of the town the buildings are grouped in between civic and low-lying site would need to be seen zone and buffer residential area. With potential to better integrate elements surrounding the street.

ature of the site with the buildings surrounding 2-5 storeys in height. The scheme with an interesting along, lessens its impact transition of the road. The line, creating a relief half way built up by the 3-5 would have an over character of the road and some dense and enclosed integrate with the mosaic character of amenity space

the site is significantly

a building projecting for the site some relief when elevation. The combination (soft parking and servicing, set elevation would need to the transitioning character the public realm and used significantly higher going to appear much the site using the ground

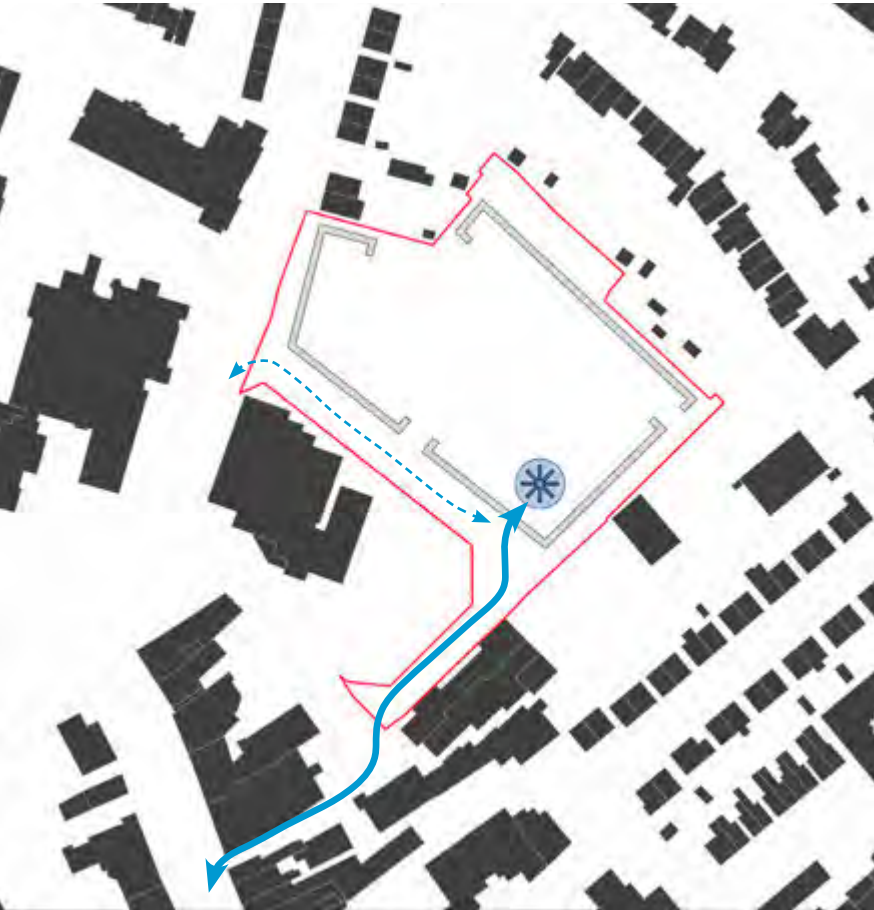
ent and articulation of homely respond to the could not be considered need to better integrate into the design of the building as a whole.

There are concerns regarding the proposed podium amenity space and the potential impact to the neighbouring properties to the north and north-west of the site.

ment would be essential, using features to reinforce activity contribute to the visual of the established local

reduction in relation to the ad to have site sections join to the surrounding

19th October 2017



Design Response

Design response to the changing context around the site

The surrounding context of the site varies greatly in use, scale and appearance, reinforcing the transitional nature of the plot.

To the north two storey semi detached buildings form a suburban residential neighbourhood, to the west the police station and locally listed magistrates court embody the civic character of the area and to the south the commercial buildings along the High Street spill out into the neighbourhood along Beasley Yard, Warwick Place and the rear of Wilmar Close.

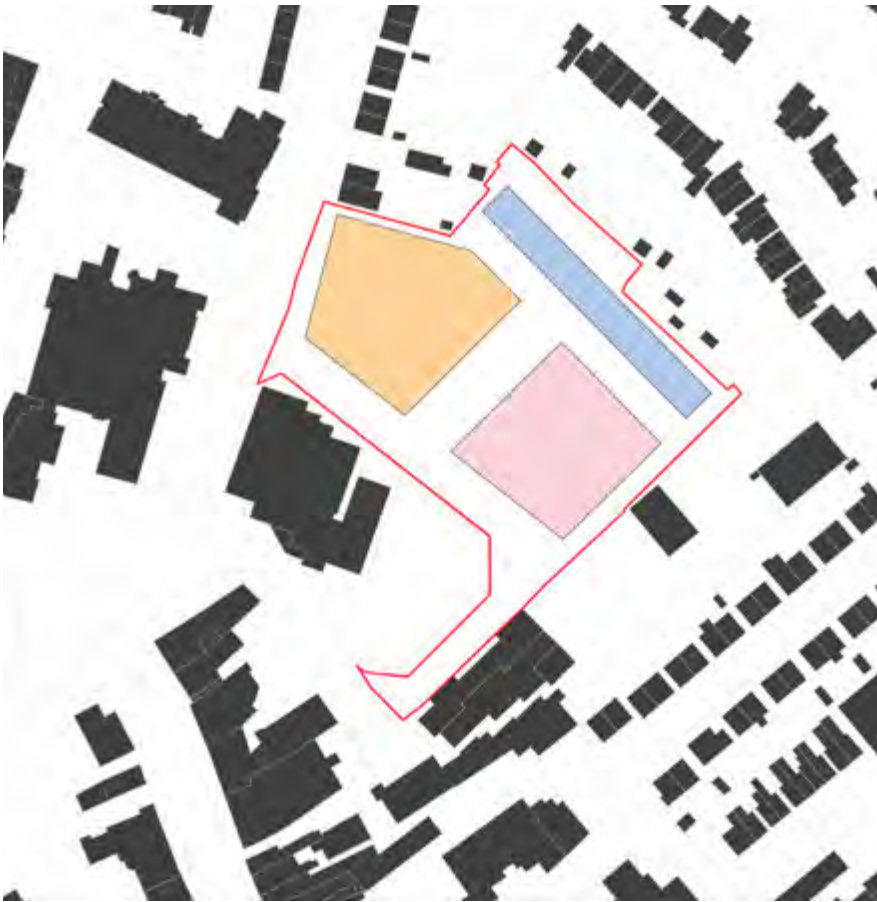
The proposed design will need to address each side carefully and respond appropriately in scale and appearance.



Responsive Massing Distribution

In response to its surrounding context, the development is broken down into three distinct zones, each varying in scale and height.

Lower buildings to the north respond to the residential buildings along Lancaster Road and beyond, medium rise development frame the setting of the civic buildings along the western site boundary and taller buildings in the south eastern corner respond to the commercial centre along Warwick Place, the High Street and the office buildings beyond.



Clearly defined urban realm

The resulting masterplan establishes clear boundary conditions around the edges of the site and defined shared spaces around and between the building lines.

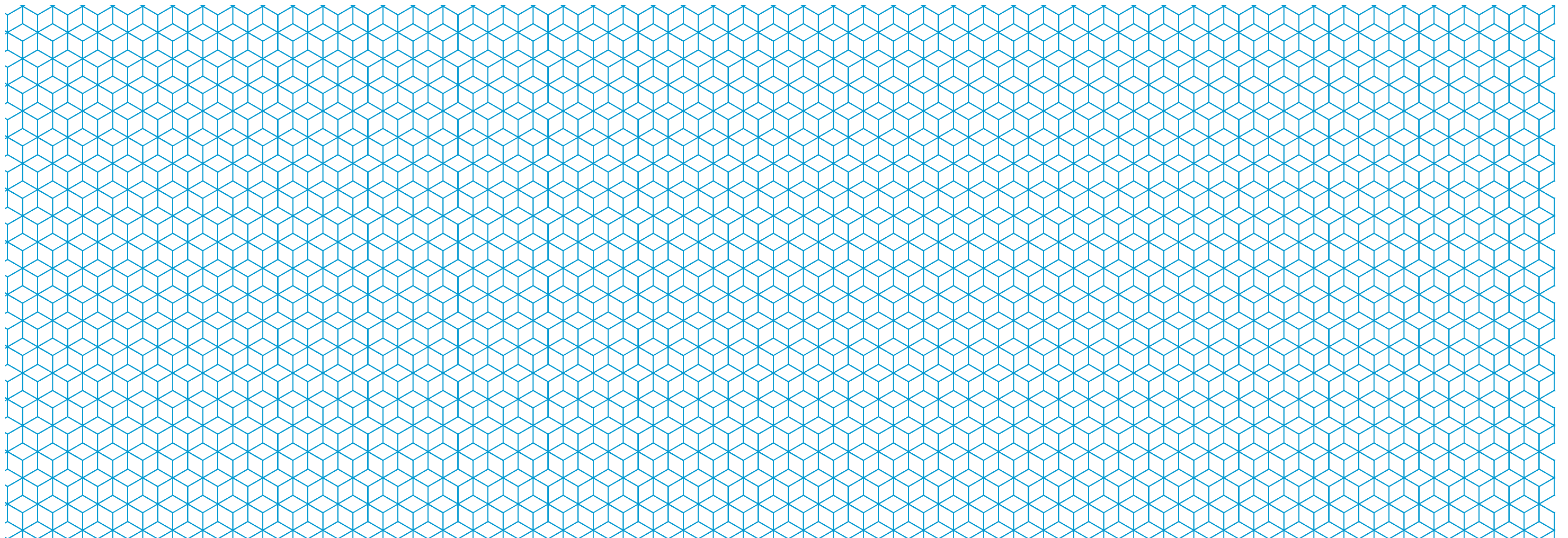
A green buffer zone surrounds the proposed development along three sides and ties into the character of the area, defined by gardens of the adjacent properties.

Towards the police station and the civic centre of Uxbridge a shared surface underlines the pedestrian nature of the new passage between Harefield Road and Uxbridge High Street.



04

Proposals



Masterplan



Proposed Masterplan

Floor Plans



Proposed Ground Floor Plan

Floor Plans



Proposed 1st Floor Plan



Proposed 2nd Floor Plan

Studio
 1 Bed 2 Person
 2 Bed 3 Person
 2 Bed 4 Person
 3 Bed 5 Person
 Core
 Corridor



Floor Plans



Proposed 3rd Floor Plan



Proposed 4th - 5th Floor Plan

Studio
 1 Bed 2 Person
 2 Bed 3 Person
 2 Bed 4 Person
 3 Bed 5 Person
 Core
 Corridor



Floor Plans



Proposed 6th - 7th Floor Plan

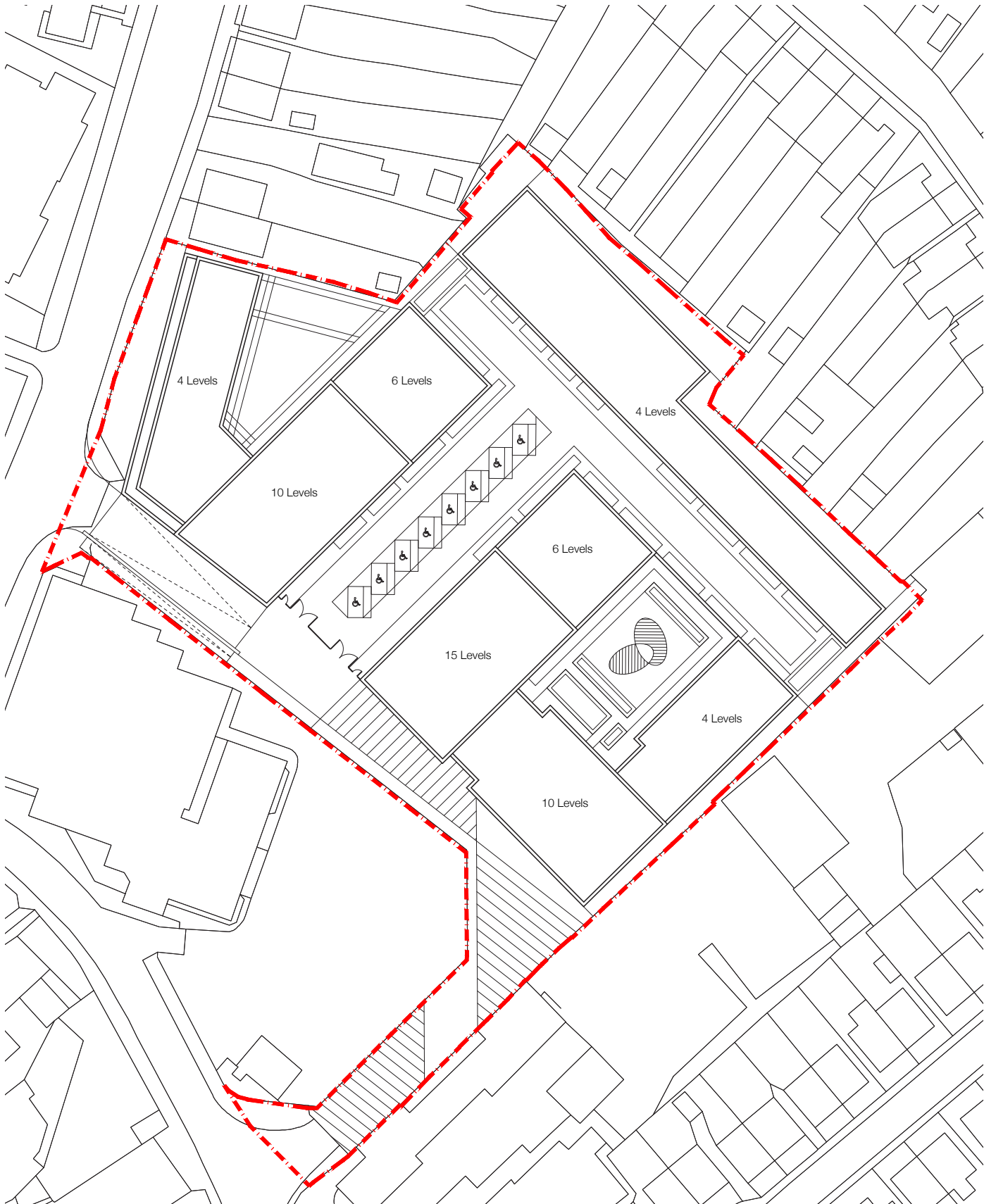


Proposed 8th - 10th Floor Plan

Floor Plans



Proposed 11th - 15th Floor Plan

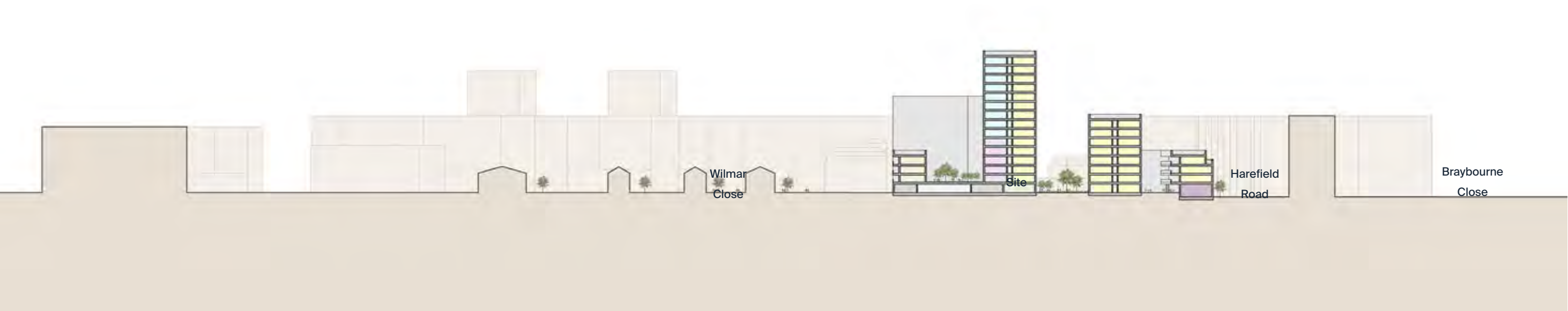


Proposed Roof Plan

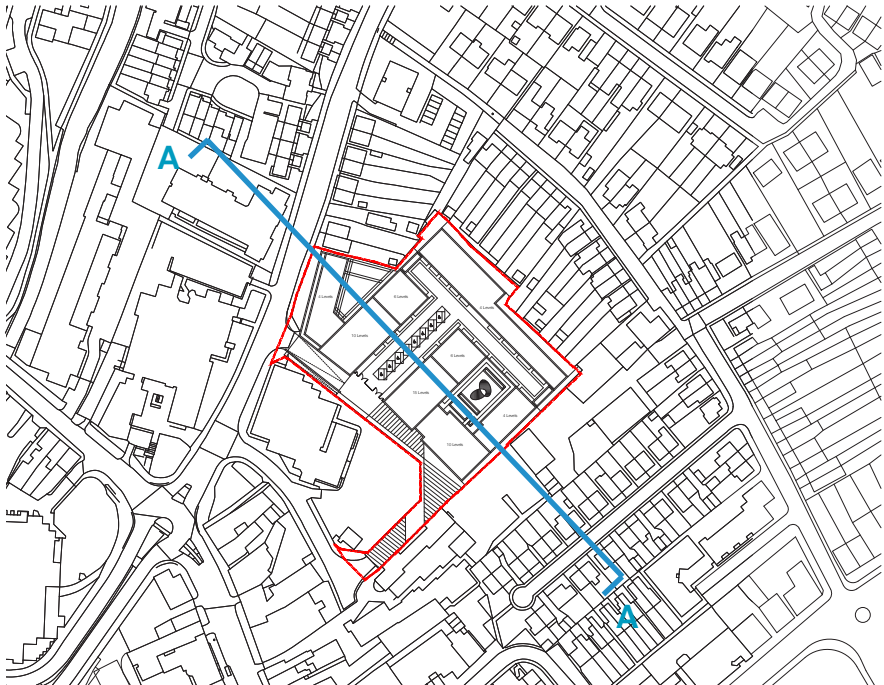
Studio 1 Bed 2 Person 2 Bed 3 Person 2 Bed 4 Person 3 Bed 5 Person Core Corridor



Site Sections



Proposed Site Section A-A



Key

- Studio
- 1 Bed 2 Person
- 2 Bed 4 Person
- 3 Bed 5 Person
- Refuse
- Corridor
- Commercial
- Shared Spaces

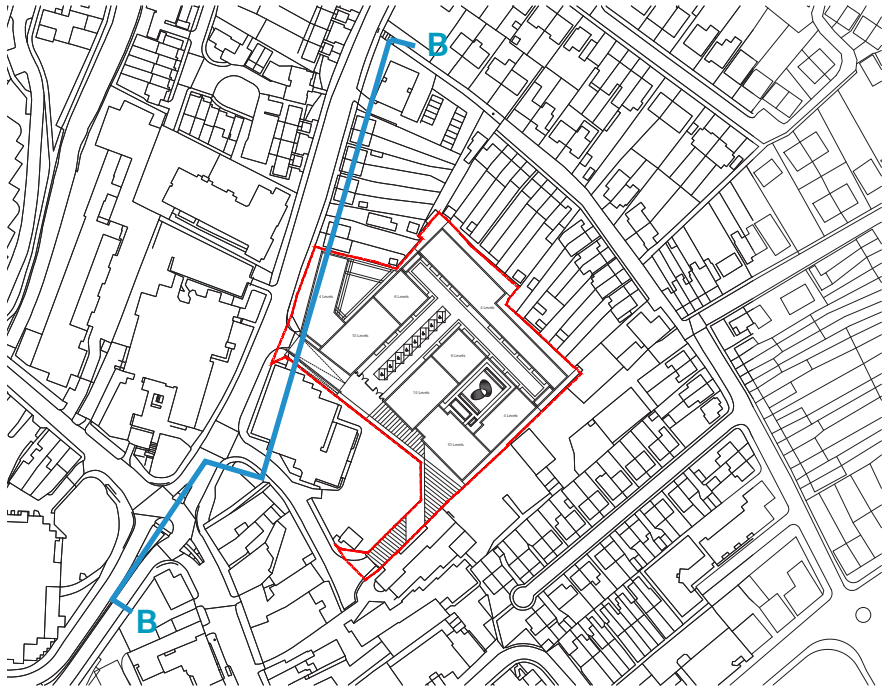


Site Sections



Proposed Site Section B-B

- 1 Bed 2 Person
- 2 Bed 4 Person
- Refuse
- Corridor
- Commercial



Key

Shadow Study



Existing Site Autumn Equinox 09:00



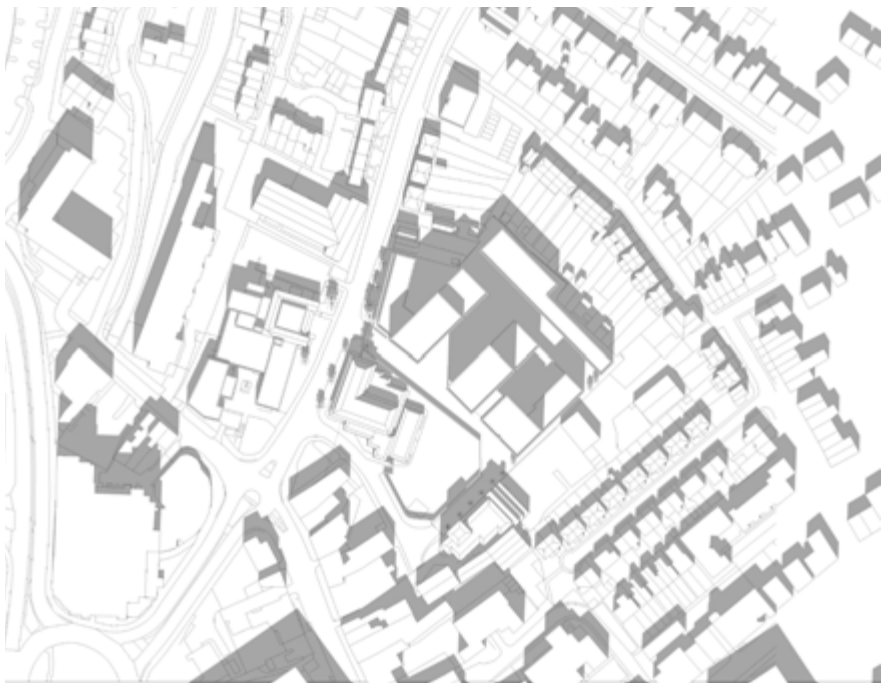
Existing Site Autumn Equinox 12:00



Existing Site Autumn Equinox 15:00



Proposed Site Autumn Equinox 09:00



Proposed Site Autumn Equinox 12:00



Proposed Site Autumn Equinox 15:00

Shadow Study



Existing Site Summer Solstice 09:00



Existing Site Summer Solstice 12:00



Existing Site Summer Solstice 15:00



Proposed Site Summer Solstice 09:00



Proposed Site Summer Solstice 12:00



Proposed Site Summer Solstice 15:00

Accommodation Schedule

Building A

Level	GIA		NIA		Efficiency	Unit Type								Total Units
	Sqm	Sqft	Sqm	Sqft	%	Studio	1B2P	1B2P (Dis)	2B3P	2B3P (Dis)	2B4P	2B4P (Dis)	3B5P	
0	1,022	11,001	500	5,382	49%	0	5	0	0	0	2	0	1	8
1	1,291	13,896	1,045	11,248	81%	1	12	0	0	0	4	0	1	18
2	1,291	13,896	1,045	11,248	81%	1	12	0	0	0	4	0	1	18
3	1,197	12,884	962	10,355	80%	1	6	0	0	1	6	0	1	15
4	836	8,999	676	7,276	81%	0	7	0	0	0	3	0	1	11
5	836	8,999	676	7,276	81%	0	7	0	0	0	3	0	1	11
6	545	5,866	430	4,628	79%	0	4	0	0	0	3	0	0	7
7	545	5,866	430	4,628	79%	0	4	0	0	0	3	0	0	7
Total	7,563	81,407	5,764	62,043	76%	3	57	0	0	1	28	0	6	95

Building B

Level	GIA		NIA		Efficiency	Unit Type								Total Units
	Sqm	Sqft	Sqm	Sqft	%	Studio	1B2P	1B2P (Dis)	2B3P	2B3P (Dis)	2B4P	2B4P (Dis)	3B5P	
0	828	8,913	639	6,878	77%	0	0	4	0	1	4	0	0	9
1	722	7,772	617	6,641	85%	0	5	0	0	1	4	0	0	10
2	722	7,772	617	6,641	85%	0	5	0	0	1	4	0	0	10
3	722	7,772	617	6,641	85%	0	5	0	0	1	4	0	0	10
Total	2,994	32,227	2,490	26,802	83%	0	15	4	0	4	16	0	0	39

Building C

Level	GIA		NIA		Efficiency	Unit Type								Total Units
	Sqm	Sqft	Sqm	Sqft	%	Studio	1B2P	1B2P (Dis)	2B3P	2B3P (Dis)	2B4P	2B4P (Dis)	3B5P	
0	2,115	22,766	426	4,585	20%	0	0	1	2	0	2	1	0	6
1	1,573	16,932	1,258	13,541	80%	1	6	0	1	3	7	0	1	19
2	1,573	16,932	1,284	13,821	82%	2	6	1	1	2	7	0	1	20
3	1,573	16,932	1,284	13,821	82%	2	6	1	1	2	7	0	1	20
4	1,285	13,832	1,007	10,839	78%	1	6	0	1	1	7	0	0	16
5	1,285	13,832	1,007	10,839	78%	1	6	0	1	1	7	0	0	16
6	993	10,689	758	8,159	76%	1	5	0	1	1	3	0	1	12
7	993	10,689	758	8,159	76%	1	5	0	1	1	3	0	1	12
8	993	10,689	758	8,159	76%	1	5	0	1	1	3	0	1	12
9	993	10,689	758	8,159	76%	1	5	0	1	1	3	0	1	12
10	484	5,210	380	4,090	79%	0	1	0	0	1	2	0	1	5
11	484	5,210	380	4,090	79%	0	1	0	0	1	2	0	1	5
12	484	5,210	380	4,090	79%	0	1	0	0	1	2	0	1	5
13	484	5,210	380	4,090	79%	0	1	0	0	1	2	0	1	5
14	484	5,210	380	4,090	79%	0	1	0	0	1	2	0	1	5
Total	15,796	170,027	11,198	120,534	71%	11	55	3	11	18	59	1	12	170

Total

Level	GIA		NIA		Efficiency	Unit Type								Total Units
	Sqm	Sqft	Sqm	Sqft	%	Studio	1B2P	1B2P (Dis)	2B3P	2B3P (Dis)	2B4P	2B4P (Dis)	3B5P	
0	26,353	283,661	19,452	209,379	74%	14	127	7	11	23	103	1	18	304
						Mix	4.61%	41.78%	2.30%	3.62%	7.57%	33.88%	0.33%	5.92%

Notes:

The above areas are approximate. Commercial areas in part include allocation for stair cores and services. They relate to the likely areas of the masterplan at the current state of the design (stage 1) and using the stated e.g. (NIA) from the Code of Measuring Practice 5th Edition, RICS/ISVA. Any decision to be made on the basis of these predictions, whether as to project viability, pre-letting, lease agreements or the like, should include due allowance for design development & building tolerances. Floors areas are subject to design development, Planning and other Statutory Approvals.

*Please note that a formula based on GIA and average unit size has been used to calculate the number of units. These figures may be subject to change once detailed space planning is carried out.



Ground Floor Shared Services & Amenity Spaces

Facility	Area	
	Sqm	Sqft
Entrances	89	958
Lounges	120	1292
Business Area	74	797
Management	87	936
Communal Facility	118	1270
Gym	214	2303
Post	32	344
Laundry	48	517
Cycle Store	304	3272
Total	1086	11690

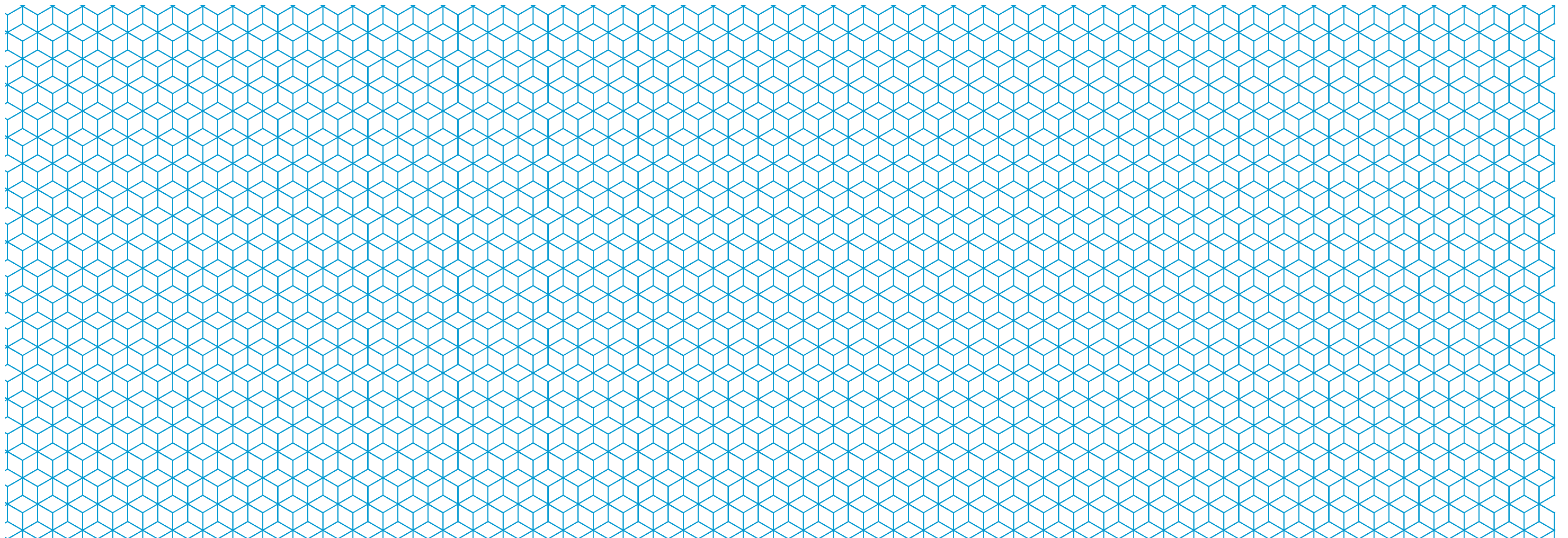
- * Commercial Unit located in Building A at ground floor
- * Sub Station located in Building A at Ground Floor
- * Services/Plant Room located in Building C at Ground Floor
- * Refuse Stores located in all buildings at Ground Floor

Site Area 0.9272 Ha

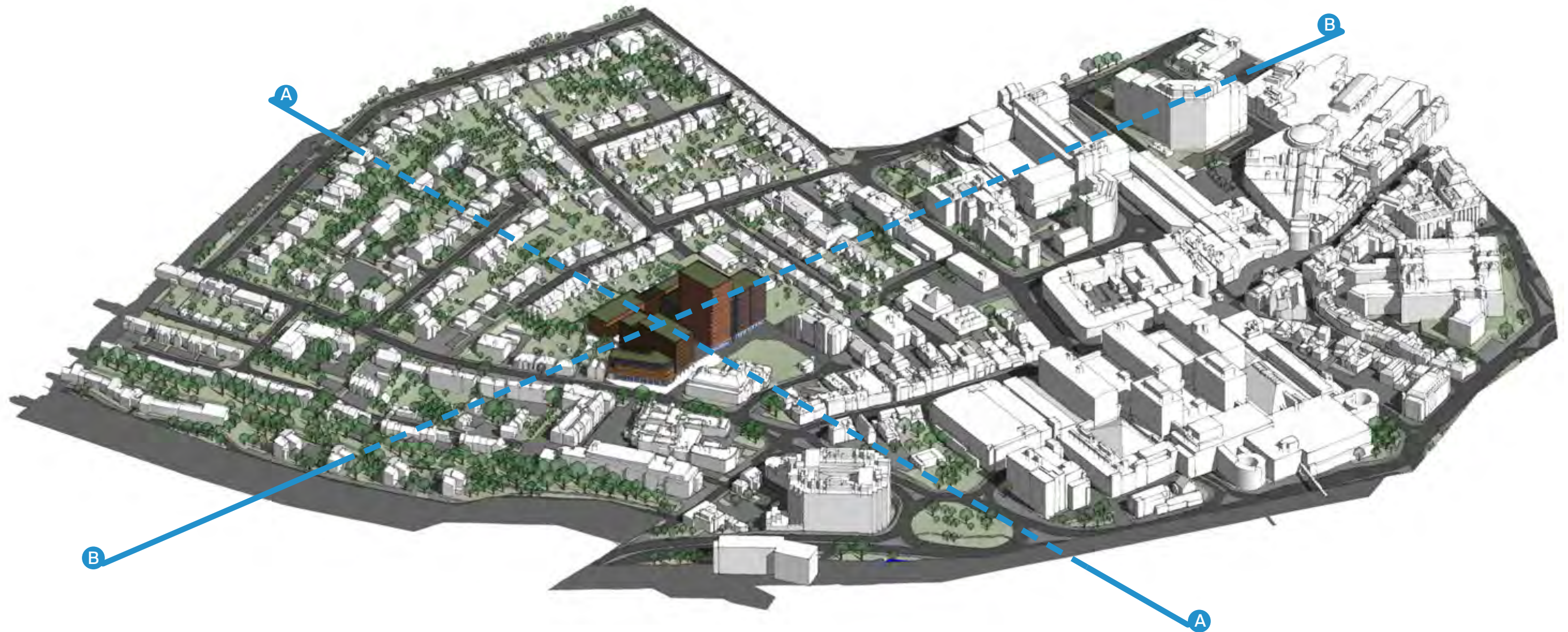
Density 327.87 Units/Ha

05

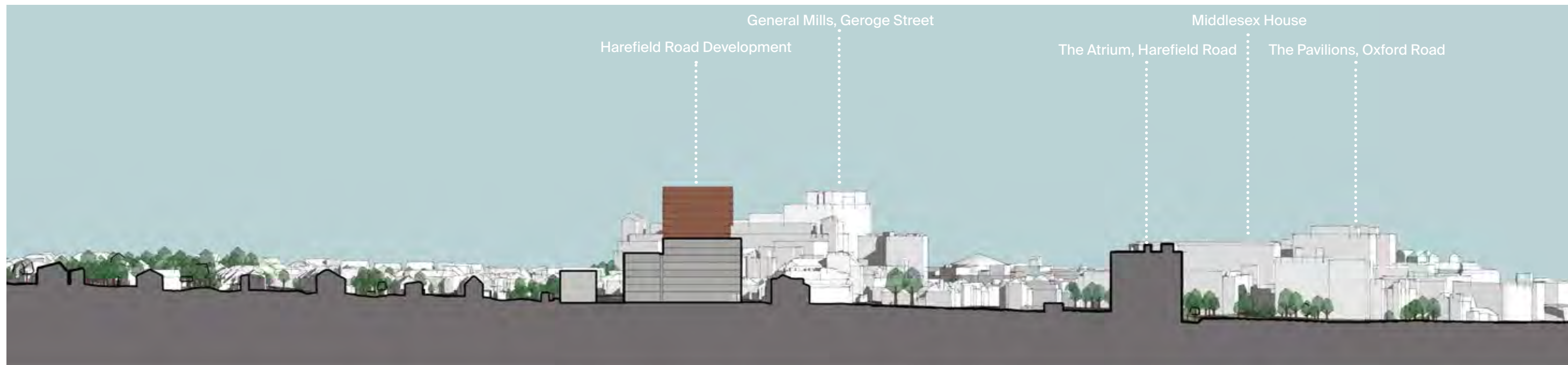
Townscape



Townscape Sections



Extent of Townscape Model



Townscape Section A-A

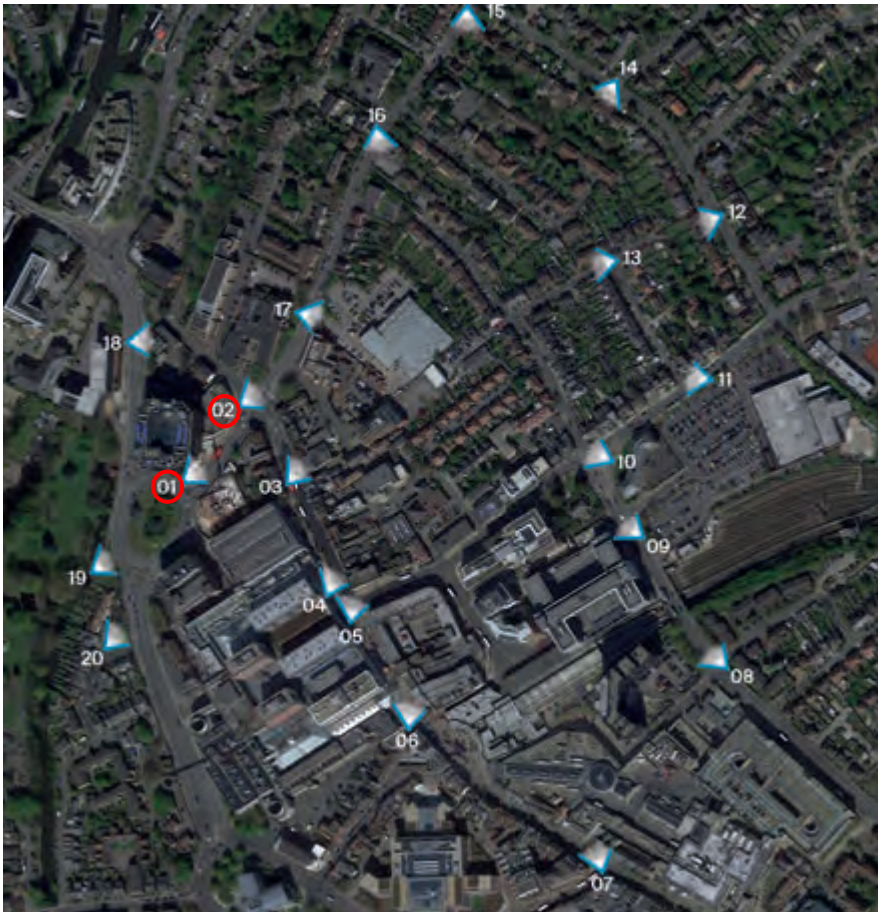


Townscape Section B-B

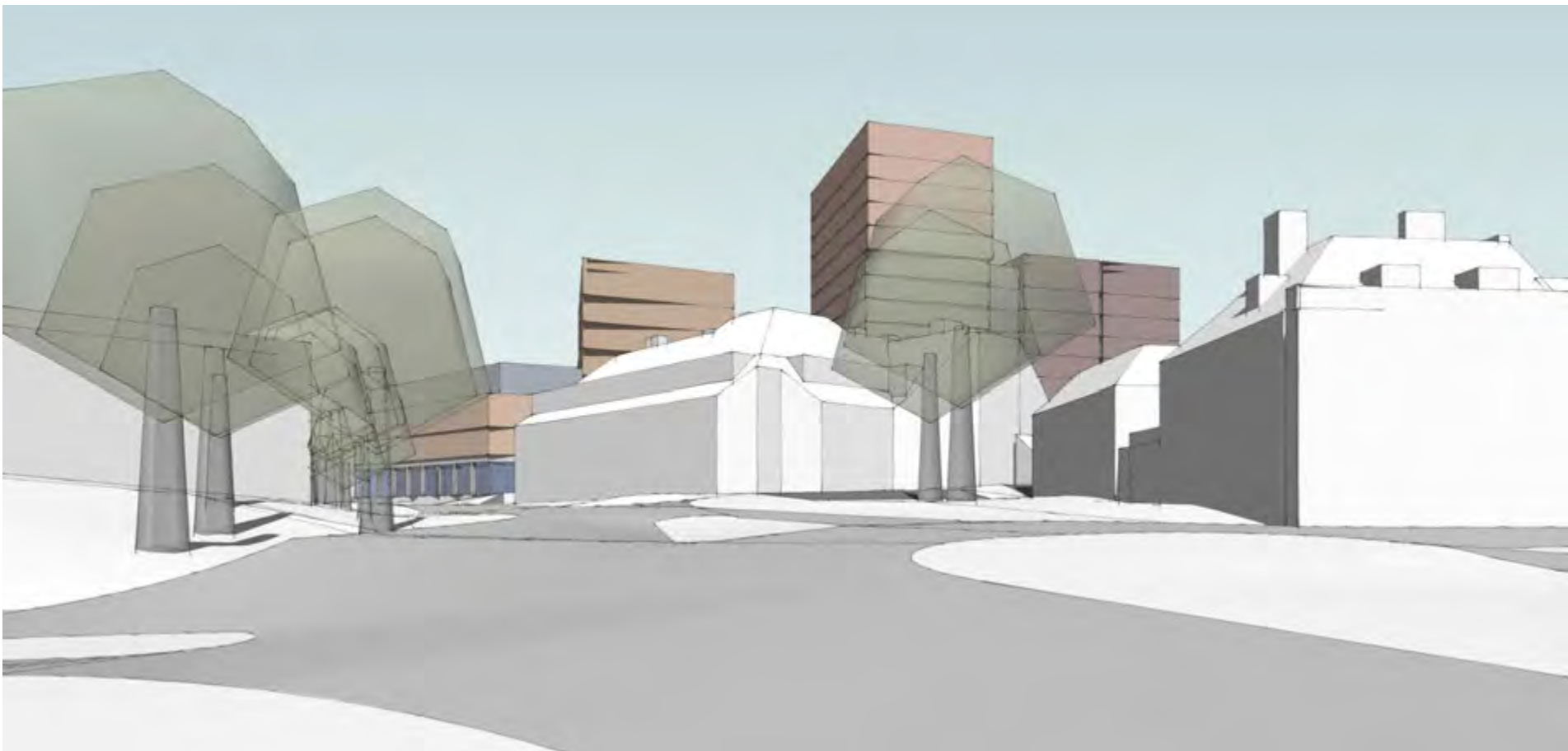
Townscape Views



View 01

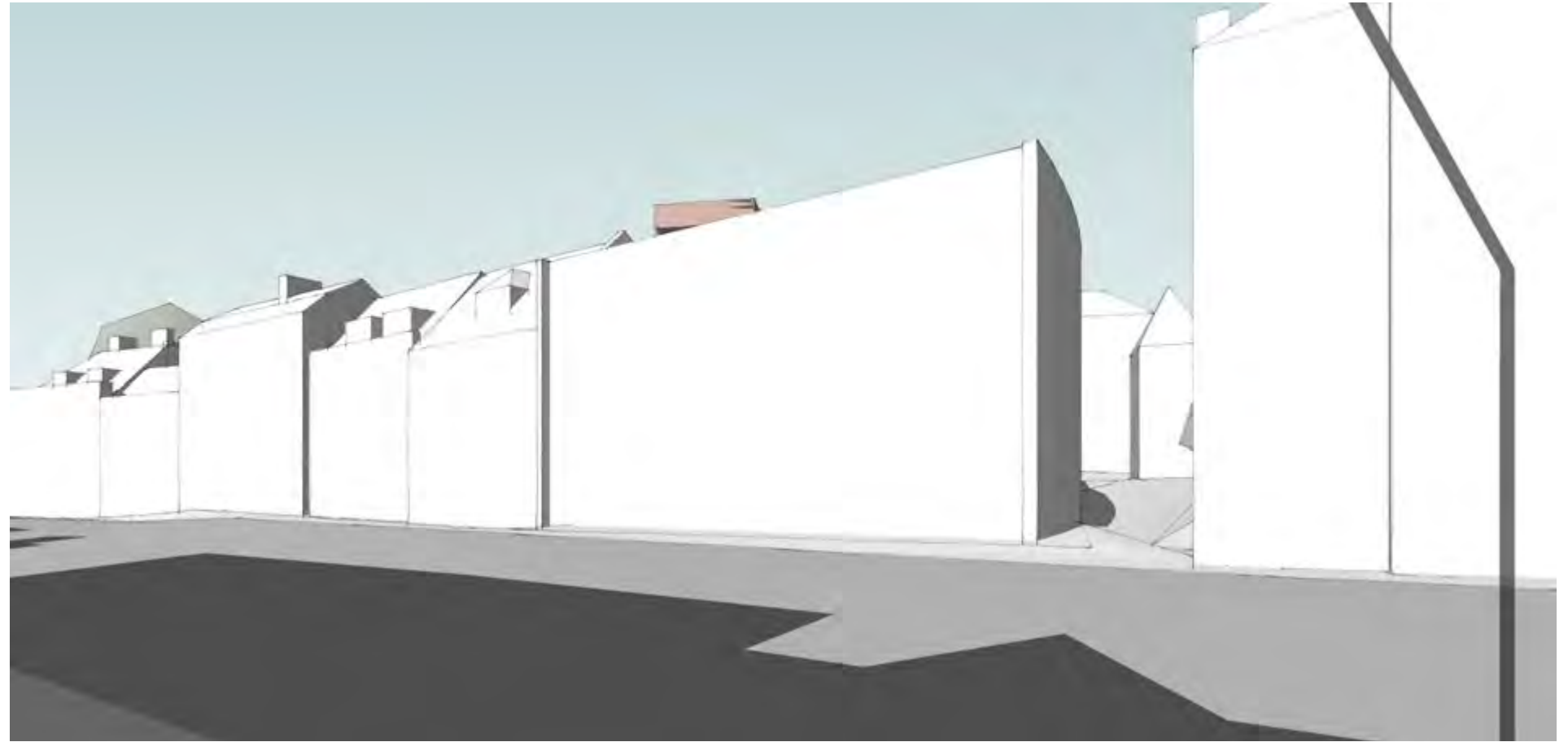


View Key

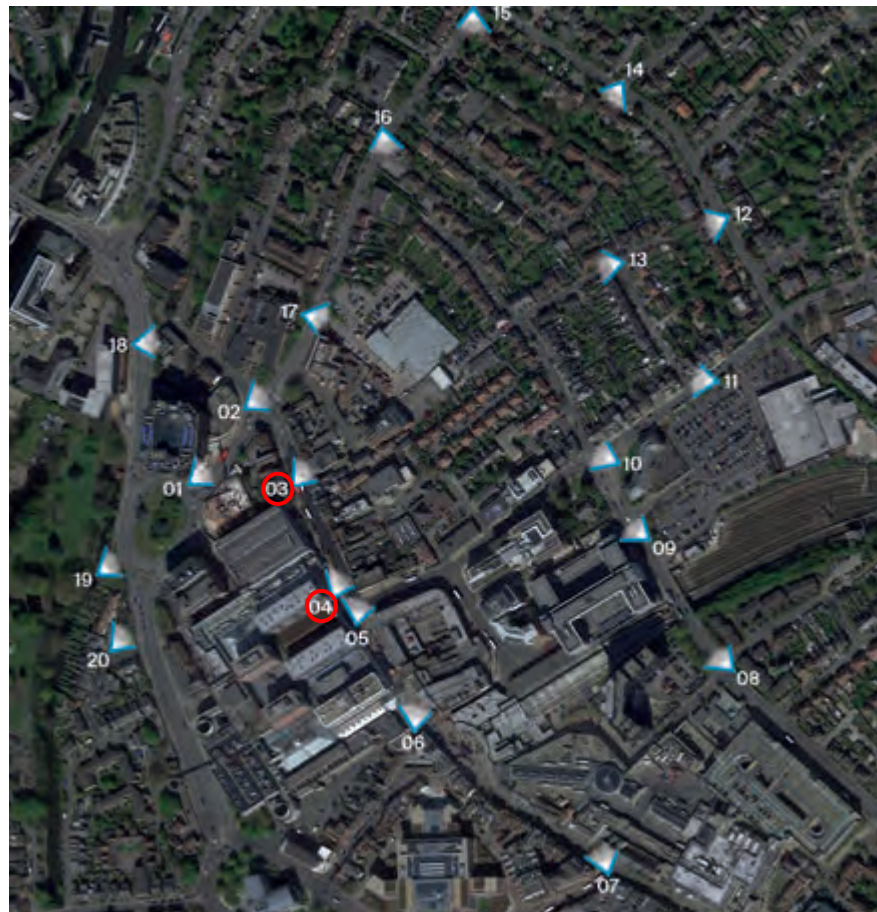


View 02

Townscape Views



View 03



View Key

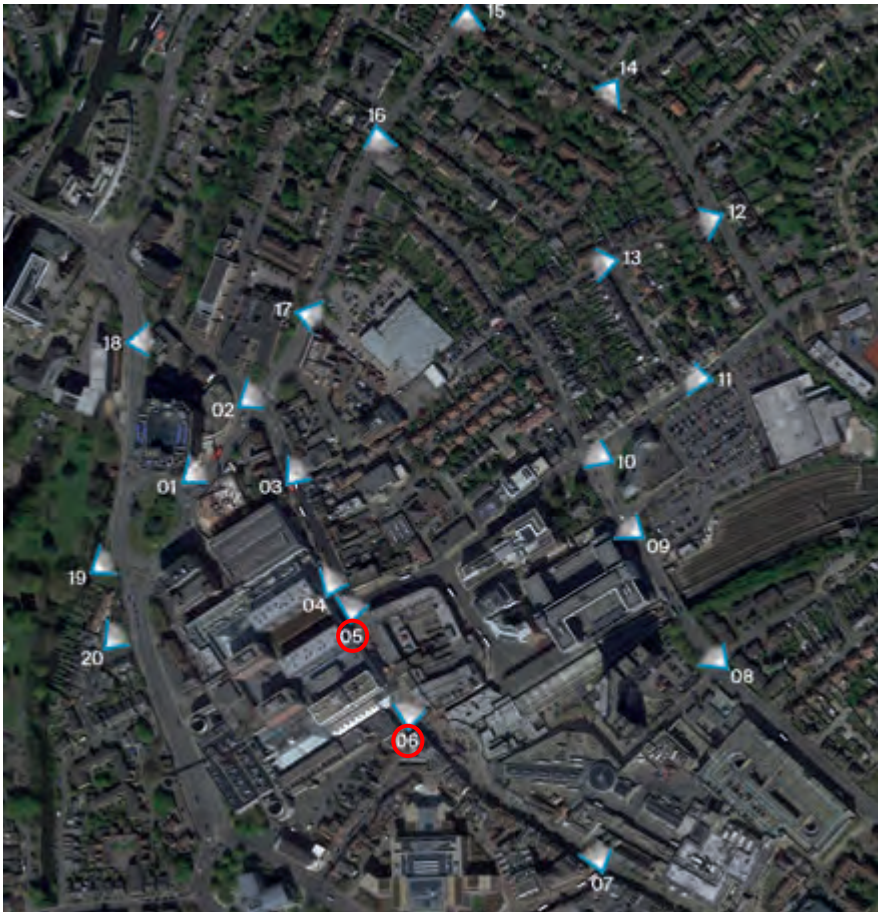


View 04

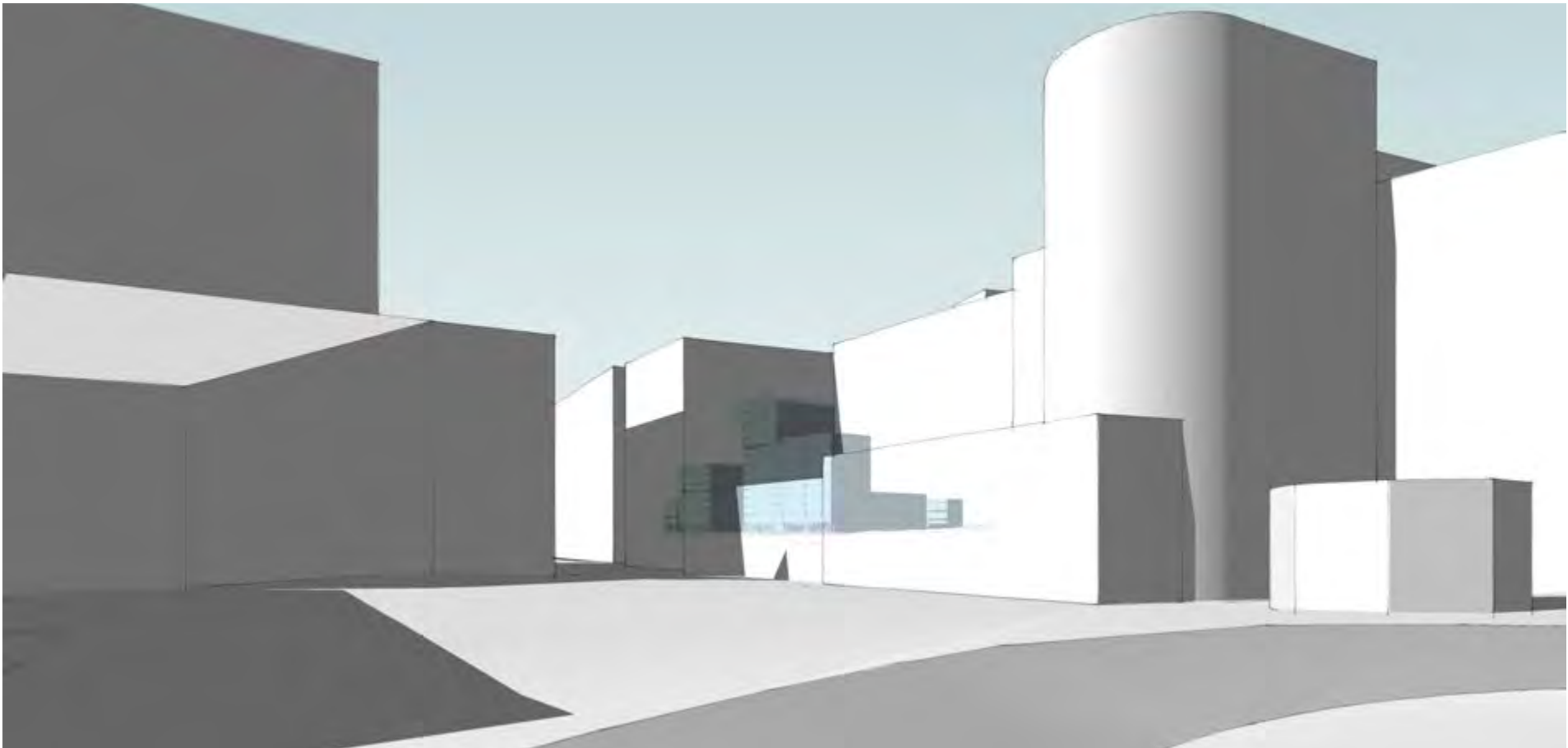
Townscape Views



View 05



View Key



View 06

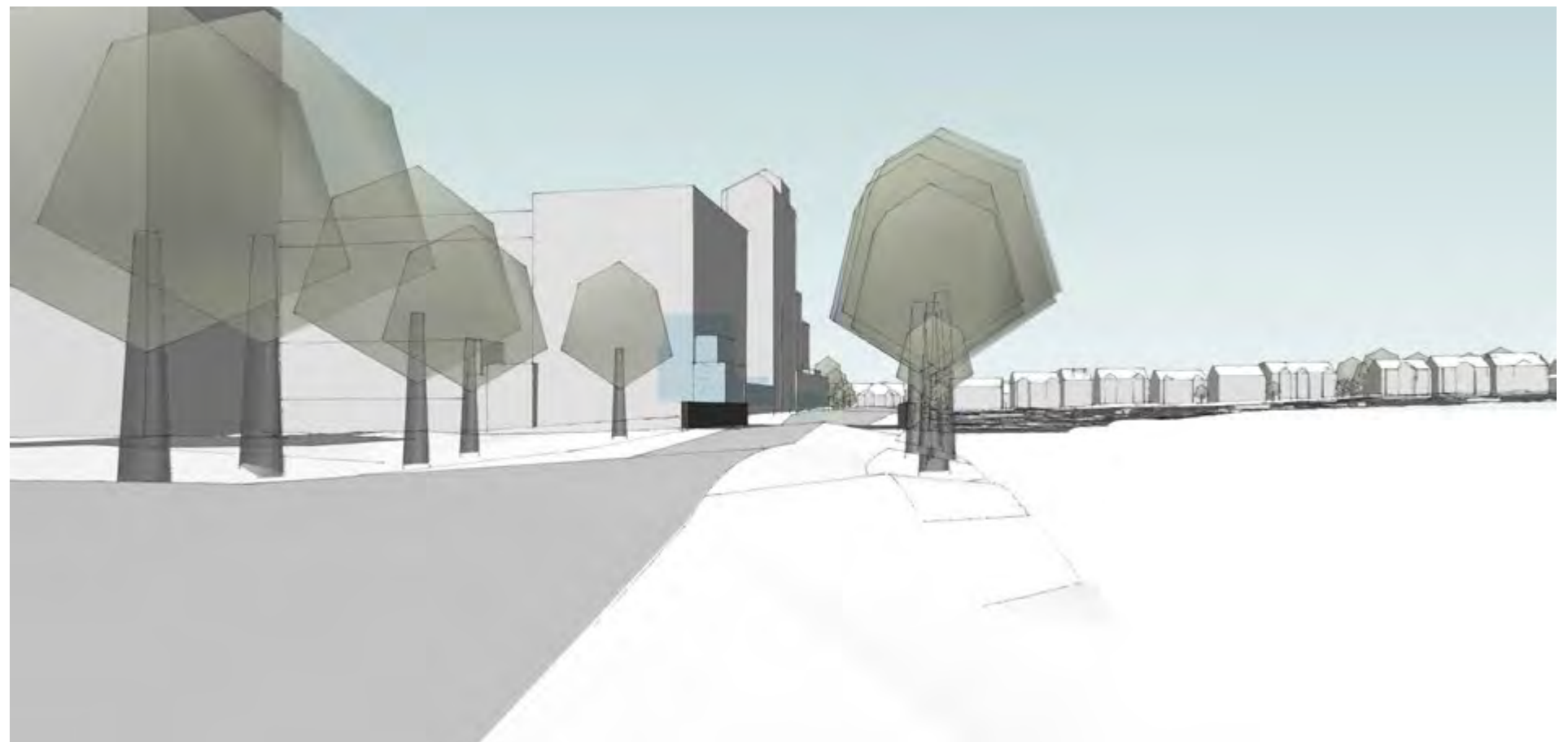
Townscape Views



View 07



View Key

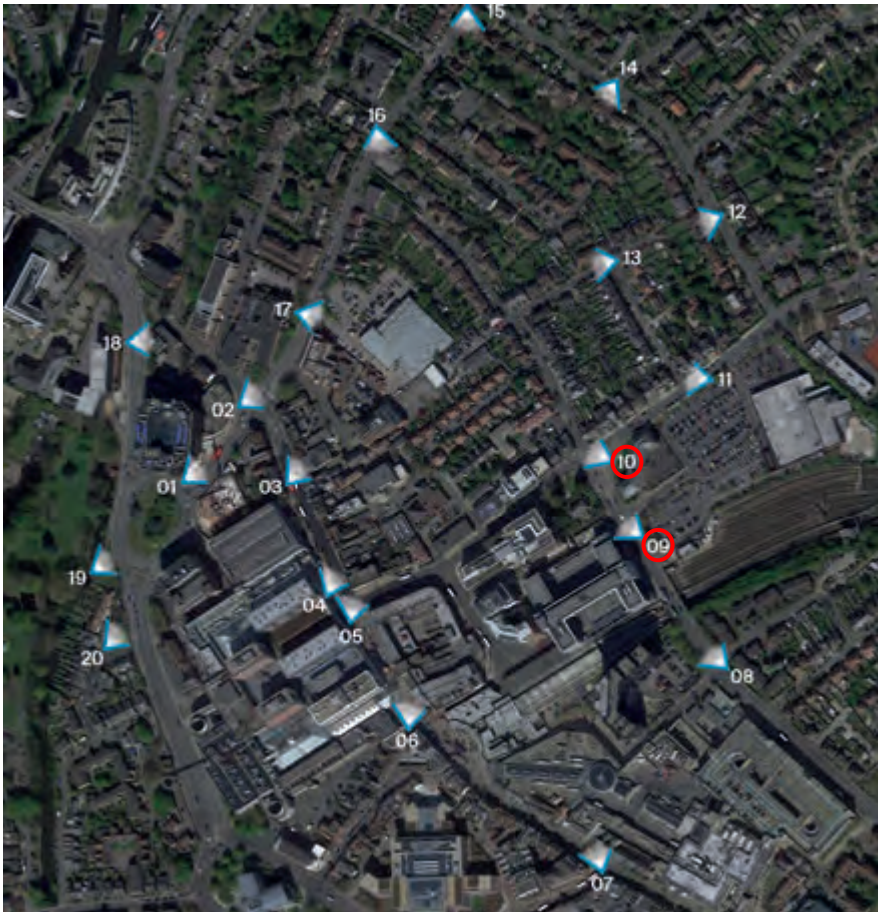


View 08

Townscape Views



View 09



View Key



View 10

Townscape Views



View 11



View Key

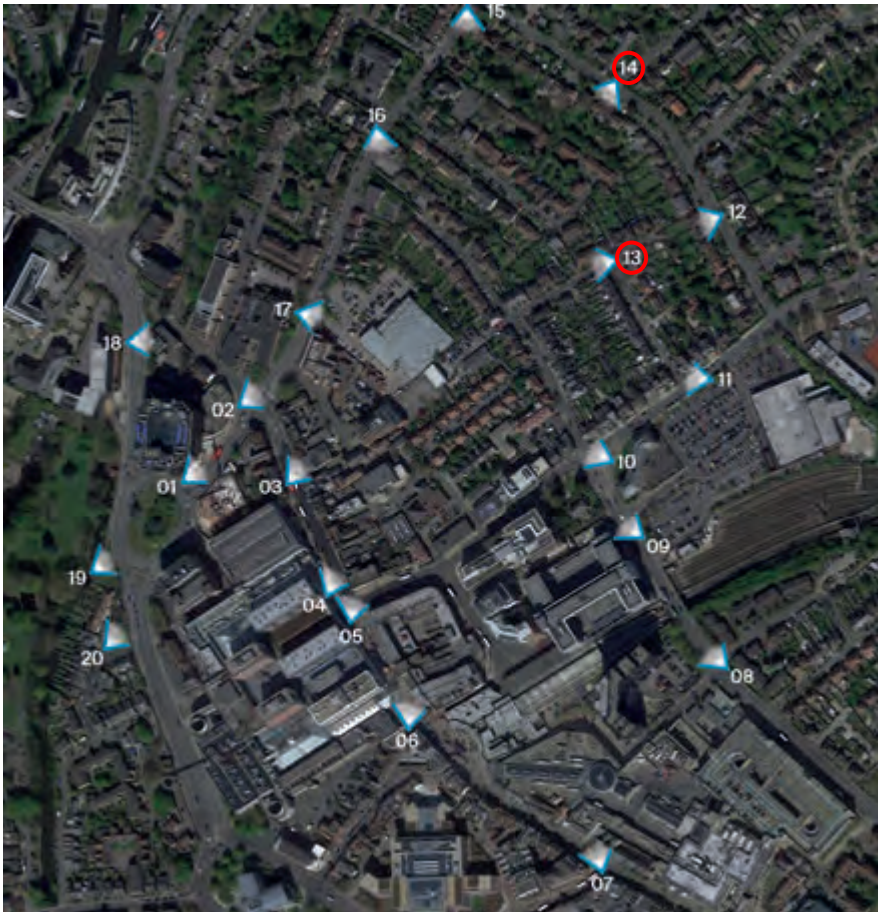


View 12

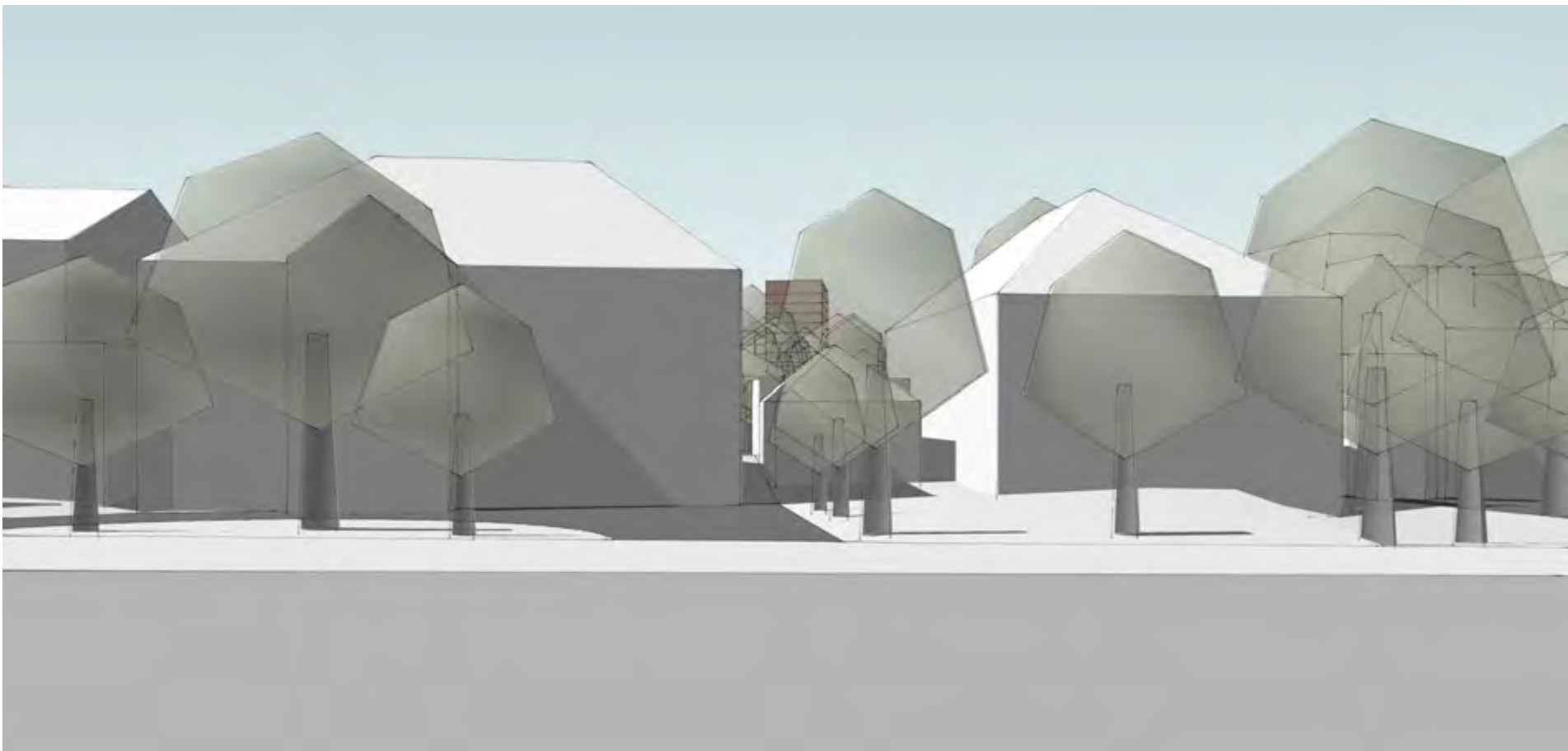
Townscape Views



View 13



View Key



View 14

Townscape Views



View 15

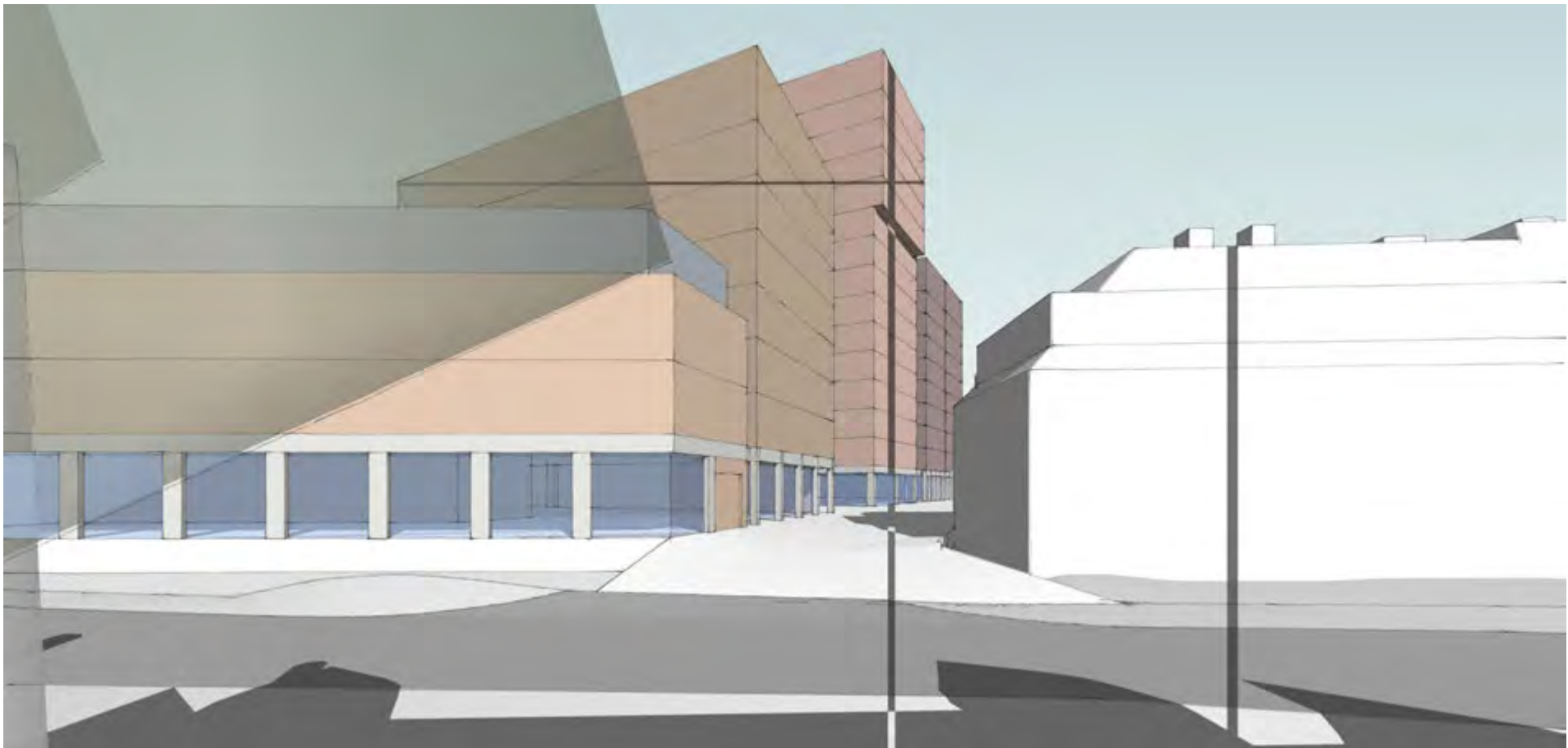


View Key



View 16

Townscape Views



View 17

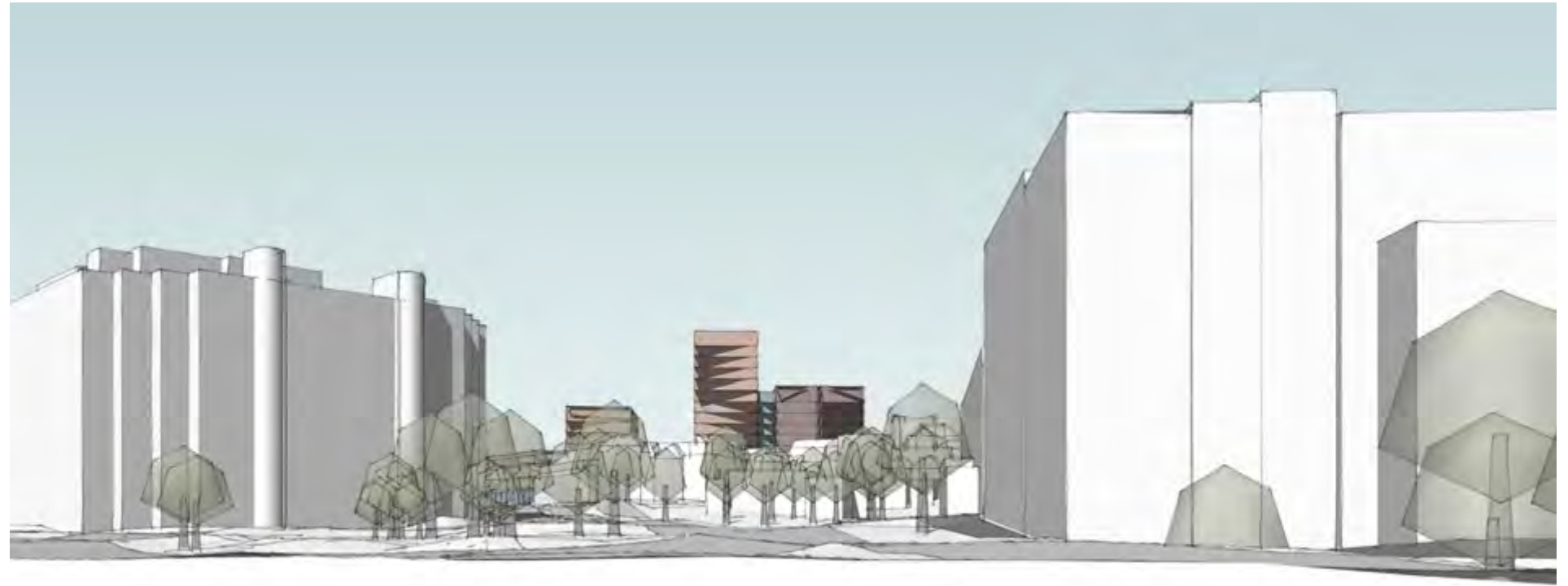


View Key

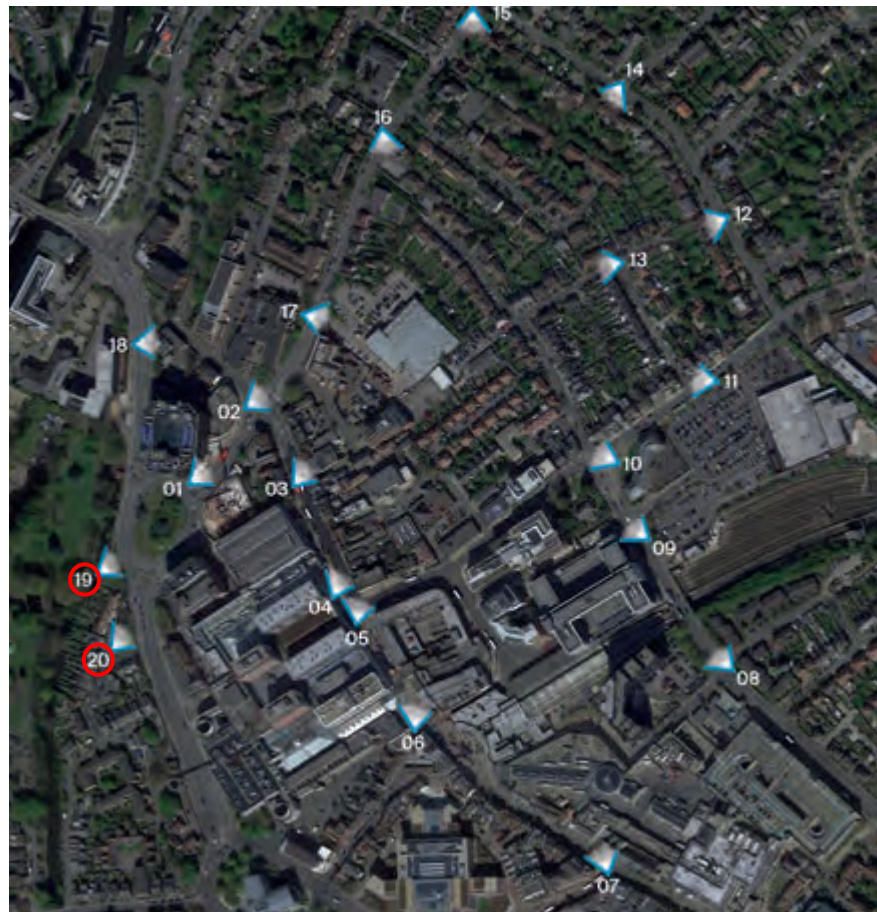


View 18

Townscape Views



View 19



View Key

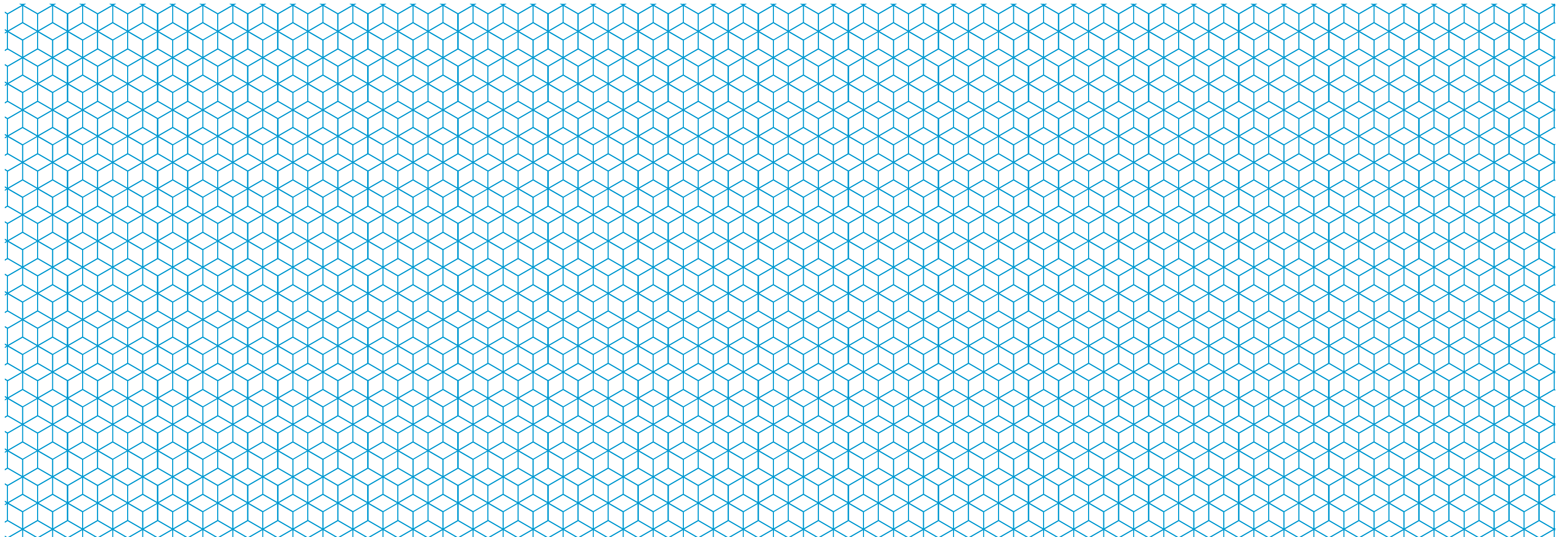


View 20



06

Servicing and Parking

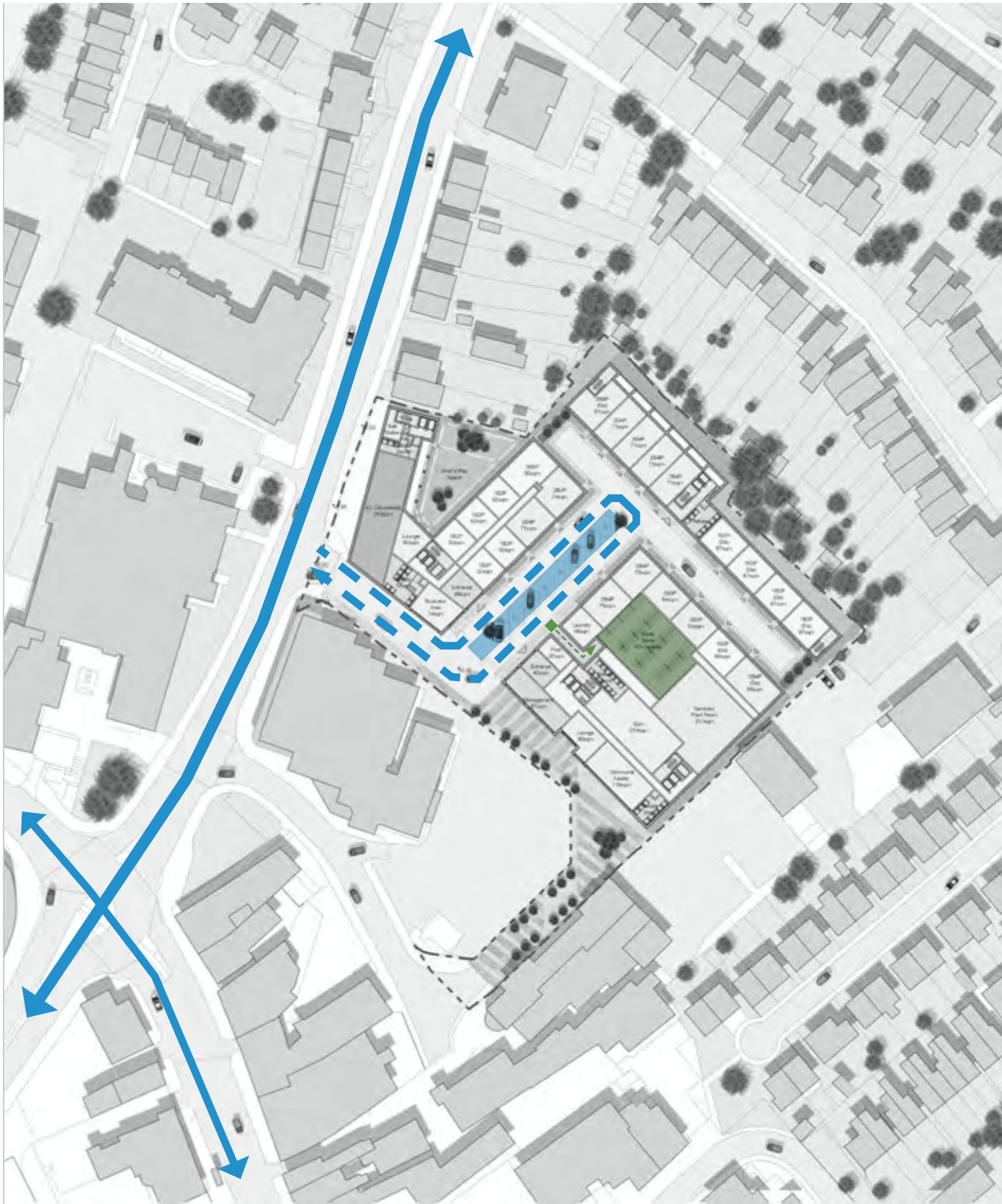


Access



- Pedestrian Entrance
- Direction of station
- Pedestrian Route

Pedestrian Access Routes



- Car parking (accessible only)
- Central bike store
- Vehicular Routes to site
- Vehicular Routes within site

Vehicular Access Routes

Servicing and Refuse



Service Vehicle Access

← - - - Service Vehicle Access



Refuse Collection Strategy

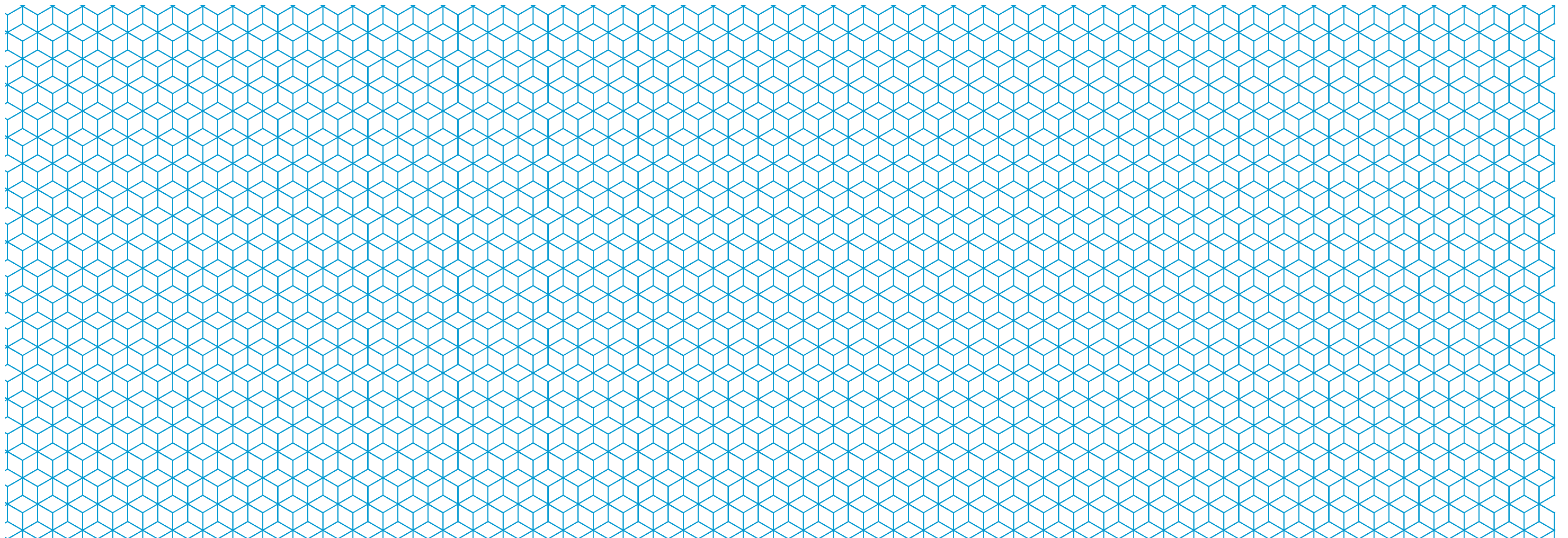
● Refuse Collection Point

..... Bins taken from Refuse Store to Collection Point



07

Appearance and Materials



Material Composition



Aerial View of Site

Precedents



Embassy Gardens, Feilden Clegg Bradley



Tower Works, Jestico + Whiles



Millbrooke Park, Forbes Massie



Streatham Hill, CJCT



Timber Yard Housing, O'Donnell + Tuomey



Mildway, Feilden Clegg Bradley

08

Summary

Summary

Key Scheme Benefits

Redevelopment of the Harefield Road site will deliver the following key benefits:

- Regeneration and optimisation of an underdeveloped site close to the town centre.
- Provision of high quality residential accommodation to meet the London wide demand.
- Introduction of ground floor commercial uses to activate the frontage to Harefield Road enhancing the streetscape.
- High quality architecture that provides a positive contribution to local townscape.
- Improving and enhancing the visual appearance of the site and in turn the wider context around Uxbridge.
- Improving the views from neighbouring properties towards the site.
- Creation of jobs throughout the construction period and long term employment opportunities within the completed development.
- A willing developer with experience in producing high quality residential schemes.



For further information please contact

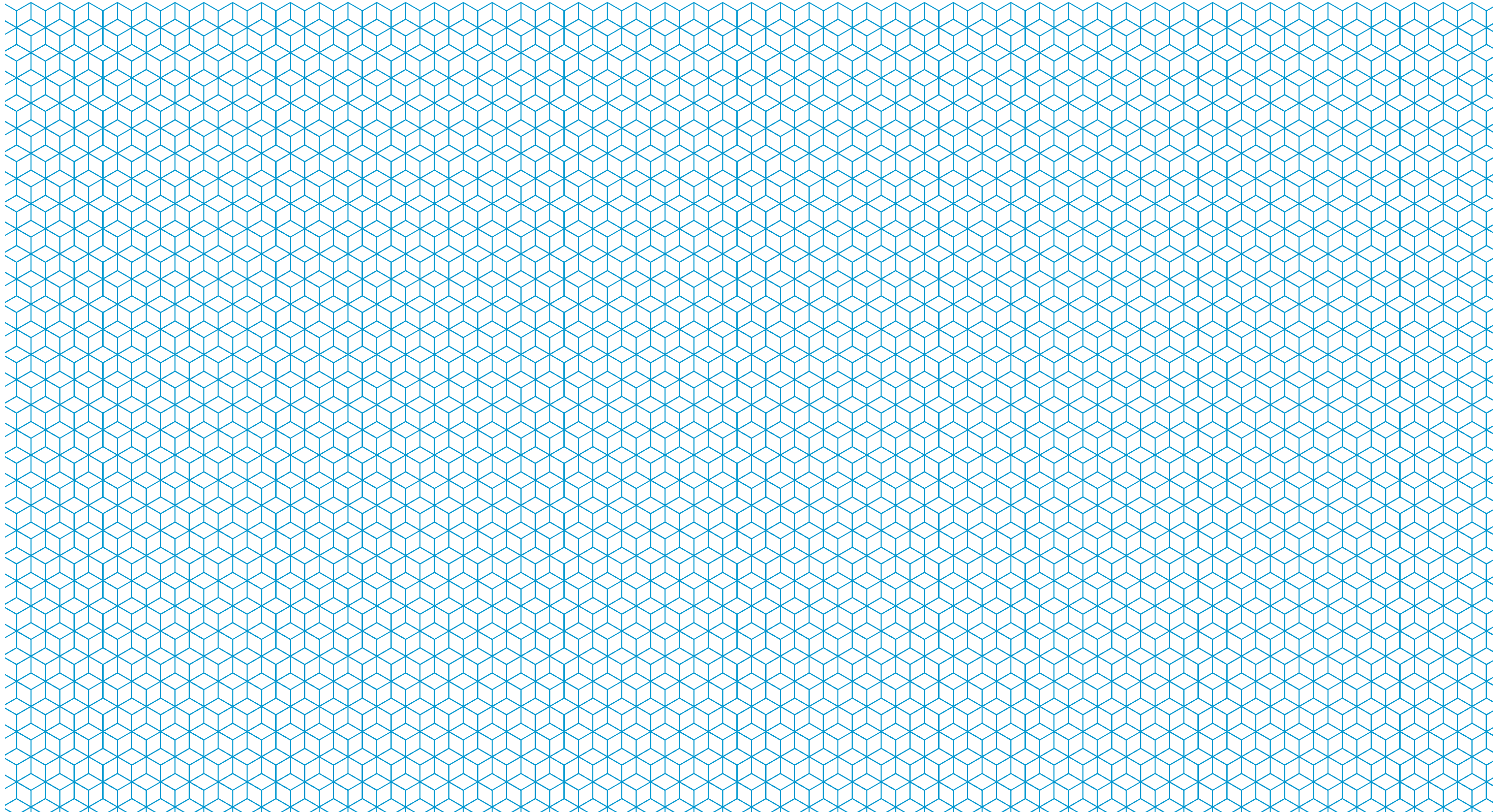
Tim Tolcher, Director

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+ (0)774 811 8876

tim.tolcher@cjtarchitects.com

**Carey
Jones
Chapman
Tolcher**



Harefield Road, Uxbridge

meeting date: 23 January 2018

meeting time: 12:00

location: City Hall, First Floor, Meeting Room 4.7w

The proposal

Demolition of existing buildings and development of 304 residential with ground floor retail floorspace along with associated landscaping, car parking and other associated works.

The applicant

The applicant is **c/o Watkins Jones**, and the architect is **Carey Jones Chapman Tolcher**.

Background

On 18 December 2017 the GLA received a request for a pre-application meeting to discuss the above proposal for the development of the above site within the London Borough of Hounslow. Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion:

1. Presentation of the scheme by the applicant

2. Principle of development

- Relevant planning frameworks; relevant planning history; and the principle of residential-led redevelopment of this town centre site.
- Loss of retail use.

3. Housing

- Build to Rent product.
- Affordable housing products, funding and viability.
- Mix of tenure, mix of unit sizes and local housing need.
- Residential density and children's play space.

4. Urban design

- Massing, scale and response to local townscape context.
- Layout, ground floor interaction, and public realm.
- Materials and building appearance, sustainability through design, and internal quality.
- Inclusive design principles, including wheelchair accessible housing, internal access and circulation, and provision of blue badge holder parking.

5. Transport

- PTAL, general approach to the transport assessment, transport principles, public transport, car and cycle parking and access, travel plan, and the Mayoral Community Infrastructure Levy.

6. Timetable, programming and scope of application, and next steps

Attending

GLA group

- [REDACTED] – Senior Strategic Planner (case officer), GLA
- [REDACTED], Principal Strategic Planner, GLA
- [REDACTED] – Senior Strategic Planner/Urban Design, GLA
- TBC, TfL

Local planning authority

- [REDACTED], LB Hounslow
- [REDACTED], LB Hounslow

Applicant

- Clare Droog, Watkin Jones
- Rob Oates, Newmark Developments
- Oliver Kampshoff, CJCT
- Kamran Haider, Vectos

for further information, contact Planning Unit (Development & Projects):

[REDACTED], **Senior Strategic Planner (case officer)**

020 7983 [REDACTED]@london.gov.uk

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

Clare Droog
Watkin Jones Group
3 Abbots Park
Preston Brook
Cheshire
WA7 3GH

Our ref: GLA/4518/JF01
Date: 5 March 2018

Dear Clare,

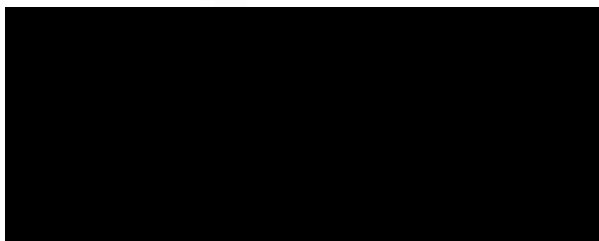
Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: Harefield Road, Uxbridge
LB: Hillingdon
Our reference: GLA/4518

Further to the pre-planning application meeting held on 23 January 2018, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



✓ Senior Manager – Development & Projects

cc Lucinda Turner, TfL

pre-application report GLA/4518/01

5 March 2018

Harefield Road, Uxbridge

in the London Borough of Hillingdon

The proposal

Demolition of existing buildings and redevelopment of the site to provide 304 Build to Rent residential units with ground floor retail floorspace along with landscaping, car parking and other associated works.

The applicant

The applicant is **c/o Watkins Jones** and the architect is **Carey Jones Chapman Tolcher**.

Context

1 On 18 December 2018 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 23 January 2018 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- [REDACTED] – Senior Strategic Planner (case officer), GLA
- [REDACTED], Principal Strategic Planner, GLA
- [REDACTED] – Senior Strategic Planner/Urban Design, GLA
- [REDACTED], TfL
- [REDACTED] TfL

Local planning authority

- [REDACTED], LB Hillingdon
- [REDACTED], LB Hillingdon

Applicant

- Clare Droog, Watkin Jones
- Rob Oates, Newmark Developments
- Oliver Kampshoff, CJCT
- Kamran Haider, Vectos

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3 The 0.8 hectare site comprises two retail warehouses occupied by a Wickes and Halfords store and associated hard standing car parking in the north of Uxbridge Town Centre, in the London Borough of Hillingdon. The primary access is from Harefield Road on the north-west boundary, with a secondary access from Warwick Place to the south west. The site is bounded by predominantly terraced residential housing to the north and north east, light industrial and office to the east and south, and civic uses (Metropolitan Police building) to its west, with an overall built form of approximately two to five storeys. The site level rises 1.2 metres from Harefield Road and then slopes gently towards the south-east.

4 The application site is not within a conservation area and there are no listed buildings within the site boundary. The Old Uxbridge/Windsor Street Conservation Area is approximately 60 metres to the south-west of the site and immediately to the north east of the site lies the North Uxbridge Area of Special Character. Part of the Uxbridge Magistrates Court which is located to the west of the site is locally listed.

5 The nearest section of the Transport for London Road Network (TLRN) is the A40 Western Avenue, which is located approximately 1.5 kilometres from the site. The nearest section of the Strategic Road Network (SRN) is the A4020, Oxford Road, which is approximately 200 metres away. The site is approximately 550 metres from Uxbridge Station which is served by London Underground Piccadilly and Metropolitan Line services. The closest bus stop is located on the High Street which is approximately 180 metres away and provides access to multiple routes. As a result, the site has a public transport access level of 5, on a scale of 1 to 6b where 6b is the most accessible.

Details of this proposal

6 The proposals seek the demolition of the existing warehouse buildings and redevelopment of the site to provide 304 Build to Rent units with ground floor retail floorspace fronting Harefield Road, in addition to landscaping, car parking and other associated works. The proposals consist of three buildings ranging from four to fifteen storeys in height.

Strategic planning issues and relevant policies and guidance

7 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hillingdon Local Plan: Part 1 - Strategic Policies, November 2012, the Saved Unitary Development Plan Policies (2007) and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

8 The following are relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance;
- Draft London Plan [consultation draft December 2017];
- Principle of development *London Plan; Town Centres SPG;*

- Housing & affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing & Viability SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy;*

Summary of meeting discussion

9 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to principle of development, housing and affordable housing, urban design and transport. GLA officer advice in respect of these issues is set out within the sections that follow, in addition to comments on the submitted sustainability statement.

Principle of development

10 London Plan Policy 2.15 identifies London's network of town centres as the main foci beyond the Central Activities Zone for commercial development and intensification including residential development, and requires development proposals within town centres to accommodate housing growth through intensification in appropriate locations. This is further supported by London Plan Policy 3.3 Part E which requires Boroughs to identify and seek opportunities to realise the potential for brownfield sites to deliver additional housing capacity to meet London's pressing housing need and recognises the contribution such sites provide for town centre renewal. Policy H1 of the draft London Plan builds upon this further and sets out that boroughs should optimise the potential for housing delivery on all suitable brownfield sites, especially and including sites with existing public transport access levels of 3 to 6, within 800 metres of a town centre boundary, and mixed-use redevelopment of car parks and low-density retail parks. On this basis, the proposed residential-led, mixed-use redevelopment of the existing small-scale retail park within Uxbridge Town Centre is therefore strongly supported by London Plan and draft London Plan Policy.

Housing

11 London Plan Policy 3.3 sets Hillingdon Council a minimum annual average housing target of 559 homes between 2012 and 2025. Policy H1 of the draft London Plan sets a revised target of 1,553 homes per year for the period between 2019/20 to 2028/29. The provision of 304 new homes on the application site would therefore make a significant contribution to meeting this target and is strongly supported by London Plan and draft London Plan policy.

Build to rent

12 The applicant proposes to deliver the residential units as Build to Rent (BtR), a product which is supported in principle by Policy H13 of the draft London Plan, the Mayor's Affordable

Housing and Viability SPG and London Plan Policy 3.8. In order to qualify as a BtR scheme, it must fully meet the criteria in Part B of Policy H13 and the Mayor's SPG, which include the requirement for a covenant to retain the homes as BtR for a period of fifteen years, in addition to a clawback mechanism to secure any difference in the total value of the market rent units and their value on a for sale basis should the covenant be broken. Both of these provisions must be secured by planning obligation as part of any future planning application.

Affordable housing

13 The scheme's contribution towards affordable housing delivery was only discussed in general terms at the meeting and as set out, any emerging scheme will be expected to fully comply with London Plan and draft London Plan affordable housing policy and these are set out below.

14 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor's Affordable Housing and Viability SPG seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The Mayor's SPG introduced a threshold approach to viability, which is now incorporated within Policy H6 of the draft London Plan. Schemes that provide 35% affordable housing on site, without public subsidy, and meet the specified tenure mix, in accordance with Policy H7 of the draft London Plan, are not required to submit viability information nor be subject to a late stage review. However, the tenure mix requirement does not apply to BtR schemes. In recognition of the distinct economics of BtR, Policy H13 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG state that affordable housing can be entirely discount market rate (i.e. all intermediate tenure). At a local level, Policy H2 of Hillingdon Council's Local Plan seeks to deliver 35% of all new housing as affordable. Any future planning application will be expected to accord fully with the local policy target as a minimum, and to ensure affordable housing is maximised. GLA officers strongly encourage early engagement on the nature of the housing provision to ensure any future planning permission accords with strategic policy.

15 For a BtR scheme to follow the Fast Track route, it must provide a minimum of 35% affordable housing, where at least 30% is provided at London Living Rent levels and the remainder let at a range of rents below market rent agreed in partnership with the GLA and Hillingdon Council, in addition to meeting all other requirements of Part C of Policy H6 of the draft London Plan. However, if an offer of less than 35% is made, or the full requirements of Part C are not met, then the applicant will be required to submit a detailed viability appraisal (FVA) and the scheme must follow the Viability Tested Route. Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Mayor's Affordable Housing and Viability SPG. The FVA must clearly set out all key appraisal inputs including: land value; developer profit margin (relative to scheme risk); build costs; and assumptions regarding rental levels and income thresholds. Both the submitted appraisal, and the findings of any independent review, would need to be shared with the GLA who will work with the Council and its advisors to robustly scrutinise the viability. In accordance with the Mayor's SPG and Policy H6 of the draft London Plan, an early stage review will be required and, if the threshold level of affordable housing is not met, a late stage review will also be required. The Council must publish the financial viability assessment including any review, in accordance with the SPG and to ensure transparency of information.

16 The applicant is strongly encouraged to meet the 35% benchmark in order to simplify the planning process. In line with London Plan Policy 3.12, draft London Plan Policy H6 and the Affordable Housing and Viability SPG, the applicant will be expected to explore all opportunities to secure grant funding to boost affordable housing supply above the maximum reasonable amount.

The applicant should nevertheless note that funding will be prioritised for schemes that meet the SPG fast track threshold.

Residential density, quality and children's play space

17 In accordance with Policy D6 of the draft London Plan, development proposals must make the most efficient use of land and be developed at the optimum density, informed by a design-led approach considering the site's context, connectivity and accessibility by walking and cycling and to existing and planning public transport and the capacity of surrounding infrastructure. The higher the density of a development, the greater the level of scrutiny that is required of its design, with particular regard to residential quality and standards and its ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2, including appropriate design review which is relevant in this case given the proposed height in this location. The applicant should also provide the relevant measures of density set out in Parts D and E of Policy D6 of the drafter London Plan for review.

18 In the context of the above, as part of any future planning application submission, a detailed housing schedule must be provided which demonstrates full compliance with the Mayor's space standards, in addition to a detailed assessment of the units against the baseline and good practice standards within the Mayor's Housing SPG and the requirements of Policy D4 of the draft London Plan. Notwithstanding the above, the current layout has not been designed to residential design standards with regards to number of units per core, resulting in a high number of single aspect units and the provision of a number of compromised studio flats on internal corners. As such, the layouts should be reviewed. In addition, as discussed at the meeting, further consideration is required with regards to the levels of privacy that will be achieved for the ground floor street facing units.

19 A detailed play strategy would be expected, demonstrating how the scheme will meet the play space requirements set out in London Plan Policy 3.6, draft London Plan Policy S4 and the Mayor's revised supplementary planning guidance 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation.

Urban design

20 Policies D1 and D2 of the draft London Plan promote the efficient use of land by optimising density through the delivery of high quality design, that responds appropriately to its local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including the existing and emerging street hierarchy, building types, forms and proportions. Policy D2 sets out the principles for delivering good design and the process of evaluation and analysis that should underpin the design process. In particular, it requires that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made. The accompanying design and access statement for any future planning application must therefore clearly address the requirements of the design policies set out in Chapter 3 of the draft London Plan.

Site layout

21 The principle of reinstating a well-defined street frontage along Harefield Road activated by commercial uses is strongly supported, as is the opportunity to improve pedestrian connectivity and permeability through the site, linking to the High Street via Little Beasley Yard. However, the proposed location of a sub station to the north of the commercial unit has the potential to provide

a poor transition to the existing housing and this element requires further consideration. In addition, the southern most corner of the site will play a key role in activating the new link to the high street. The applicant should review the ground floor layout to locate an active use, such as a residential entrance in this location to help animate this frontage.

22 As discussed at the meeting, while the management requirements associated with the Build to Rent product are acknowledged, the proposed development has the potential to appear and feel like a gated community which is a form of development that is resisted by Policy D4 of the draft London Plan, the Mayor's Housing SPG and London Plan Policy 3.9. In accordance with these policies and guidance, the applicant is strongly encouraged to explore alternative means of security through utilising the principles of good urban design as opposed to providing a fixed gate line.

23 Any additional parking over the requirement for one additional disabled persons parking bay would have a detrimental impact on the quality of public realm and ground floor accommodation, due to its potential to dominate the use of this residential amenity space. Therefore, careful consideration of how this can be achieved and the landscaping treatment in this area will be required.

Height and massing

24 The broad height and massing rationale which steps down to the neighbouring low rise properties with a distinctively taller element to the centre of the site is considered broadly appropriate in this location. However, the quantum of development proposed would result in a significant step change in the current height and character in this part of Uxbridge, and the townscape and daylight/sunlight impacts should be rigorously tested in order to demonstrate the suitability of this location for a building significantly taller than its surroundings. Townscape views should be agreed with the borough, and should show any permitted schemes in the surrounding context, in addition to a detailed assessment of any impact on the adjacent conservation areas and listed buildings.

25 As discussed at the meeting, GLA officers raised particular concerns about the potential impact the proposed bulk to the south of the site could have on the neighbouring properties and their development potential should they come forward in the future and this should therefore be tested further. In addition, given the potential for the Metropolitan Police site to come forward for development, the proposals should also be tested against an indicative massing for this site with the results shared with the Council and GLA officers for review.

Appearance

26 The proposed architecture should compliment the existing character of the surrounding area and carefully consider how to respond to the transition in scale from the existing properties.

Inclusive access

27 The design of the landscaping and the public realm will be fundamental to how inclusive the development will be for many people and this should be given detailed consideration as the design is developed, particularly given the significant change in levels across the site and the proposed vehicular servicing routes. Therefore, in accordance with Policy D3 of the draft London Plan, London Plan Policy 7.2 and the Accessible London SPG, the proposed development will be expected to achieve the highest standards of accessible and inclusive design, demonstrated through the provision of an inclusive design statement. The statement should show how disabled people access and move through the public open spaces and each of the entrances safely, including details of levels, gradients, widths, surface materials of the paths and seating proposed.

Any shared surfaces should include routes and areas where vehicles would not be able to enter with the carriageway rather than pavement being shared between vehicles and pedestrians. Furthermore, as required by Policy D5 of the draft London Plan and London Plan Policy 3.8, at least 10% of the residential units must be design to Building Regulation standard M4(3) standards, with the remaining 90% designed to Building Regulation standard M4 (2).

Energy

28 The submitted sustainability strategy has been review and the following comments should be addressed as the scheme develops. Updated energy assessment planning guidance is available on the GLA website (March 2016). This provides further information on the revised targets to take into account Part L 2013 of the Building Regulations. It also provides details on the information that should be included within a detailed energy statement to be submitted at the application stage and in accordance with Policy SI2 of the draft London Plan. The Mayor will apply the zero carbon for residential development.

29 The carbon emission figures should be reported against a Part L 2013 baseline. The above-mentioned guidance provides details on presenting carbon emission information separately for domestic and non-domestic elements of the development in light of the zero carbon target for domestic development.

30 The applicant should commit to meeting Part L 2013 by efficiency measures alone and sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

31 Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with London Plan Policy 5.9 and Policy SI2 of the draft London Plan. The applicant should particularly consider how best to mitigate any restrictions posed by, for example, local air quality or noise issues, ground floor and single aspect units. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended and an area weighted average for the actual and notion cooling demand should be provided. A domestic overheating checklist is included in the GLA's energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process. The completed checklist should be included in the appendix of the energy statement.

32 The applicant should fully investigate opportunities for connection to nearby district heating networks in accordance with Policy SI3 of the draft London Plan and the applicant should liaise with the Council's energy officer to investigate potential opportunities for connection. The site should be served by a single energy centre and site wide heat network that is suitable for connection to wider district networks now or in the future. All uses on the site should be connected to the network and a drawing/schematic demonstrating these connections should be provided. Where a site wide heating network is not deemed to be feasible the rationale for this should be provided.

33 A plan showing the size and proposed location of the energy centre should be provided and the applicant should follow the energy hierarchy when considering the potential for CHP and renewable energy technologies. In line with Policy SI3 of the draft London Plan and London Plan Policy 5.7 the applicant should investigate the inclusion of on-site renewable energy generation. If solar technologies are to be proposed, a plan showing the proposed location of the installation should be provided.

Transport

Transport assessment

34 A transport assessment prepared in accordance with Transport for London's (TfL) best practice guidance must be submitted in support of any future planning application. The TRICS data referred to in Appendix C of the submitted transport assessment scoping note should be submitted to TfL for review by TfL in advance of any planning application submission.

Access

35 The proposals seek to retain the current vehicular access from Harefield Road. A new pedestrian link to the south of the site, upgrading the current passage to the site is also proposed and this is supported in accordance with Policy T2 of the draft London Plan. Access for cyclists and links to local cycling routes should also be addressed in the transport assessment.

Car parking

36 The development is proposed as 'car free', with the exception of disabled persons parking, which is strongly supported in accordance with the draft London Plan which clearly sets out that development in all areas of PTAL 5 to 6 such as this should be car-free with the exception of blue badge parking. Eight accessible spaces on site are proposed, however, this falls short of the minimum requirement set out in Policy T6.1 of the draft London Plan which requires one designated disabled persons parking bay per dwelling for 3% of the dwellings, to be provided from the outset and for applications to demonstrate on plan and as part of the car parking design and management plan, how the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required in the future. The applicant should therefore provide one additional space to meet the minimum policy requirement. In addition, 20% of the spaces should have electric charging facilities, with passive provision for all remaining spaces in line with Policy T6.1 of the draft London Plan. It is understood that the Council has requested additional parking is included in the scheme, this would be contrary to Policy T6 of the draft London Plan and conflicts with the overarching aims of the draft Mayors Transport Strategy to support sustainable travel and reduce car dominance and therefore any increase above the minimum disabled parking requirement is strongly resisted.

Cycle parking

37 Long and short stay cycle parking across land uses must be provided in accordance with the standards set out within Policy T5 of the draft London Plan. These spaces should be located in a secure, sheltered and accessible location, and designed in accordance with the London Cycle Design Standards (LCDS). The London Plan, supported by LCDS, sets out that 5% of stands ought to be able to accommodate larger cycles. The proposals should provide a mix of types of cycle stands, preferably including the Sheffield style of stands, as this is the easiest way to meet accessibility requirements on types of cycle parking, as well as serve different user needs generally. As discussed at the meeting, the cycle parking for residential units should be more evenly distributed across the various buildings, rather than in large cycle stores as currently proposed, to make them more accessible and convenient to encourage cycling.

Pedestrian environment

38 A pedestrian environment review system (PERS) audit or similar should be undertaken to the nearest bus stop, stations and local facilities. The survey should be submitted with the

application and all identified improvements agreed with the highway authority and secured through section 278 or section 106 agreement. The public realm should be designed in accordance with Healthy Streets principles set out in Policy T2 of the draft London Plan.

Travel planning, construction and servicing logistics

39 A draft travel plan produced in accordance with TfL guidance should be submitted to support of any future planning application to further promote, encourage and identify ways of sustainable travel. Measures to encourage sustainable travel should be included, such as cycle vouchers/free bicycles, marketing and promotional events. The final document should be secured, monitored, enforced and reviewed through the section 106 agreement. In accordance with London Plan Policy 6.14, a framework delivery and servicing plan and construction logistics plan should be provided to allow TfL to agree the approach and these must be secured by condition.

40 At this stage, there are concerns in relation to the delivery and servicing area. Any final design should be in line with TfL's delivery and service planning guidance and ensure pedestrian and cycle safety is prioritised. The delivery and service plan should reflect the need for robust safety standards from freight operators and the inclusions of the requirements for providers of goods transport services to offer Fleet Operator Recognition Scheme (FORS) – or FORS bronze-equivalent or better safety accreditation.

Mayoral Community Infrastructure Levy

41 In accordance with London Plan Policy 8.3 and Policy T9 of the draft London Plan, a contribution towards the Mayor's Community Infrastructure Levy (CIL) must be secured.

Conclusion

42 The proposed residential-led, mixed-use redevelopment of the existing small-scale, low-density retail park within Uxbridge Town Centre is strongly supported by Policy H1 of the draft London Plan and policies 2.15 and 3.3 of London Plan, as is the proposed Build to Rent product; subject to it fully meeting the requirements of Part B of Policy H13 and Policy H6 of the draft London Plan, and the Mayor's Affordable Housing and Viability SPG.

43 The broad height and massing rationale which steps down to the neighbouring low rise properties with a taller element to the centre of the site is broadly appropriate in this location. However, given the proposed step change in the current height and character in this part of Uxbridge, this should be rigorously tested in order to demonstrate the suitability of this location for a building significantly taller than its surroundings. In addition, given the potential for the Metropolitan Police site to come forward for development, the massing should also be tested against an indicative scheme for this site with the results shared with the Council and GLA officers for review.

44 Further to the above, and in line with the draft London Plan and London Plan policies, the applicant should ensure that the future planning application addresses the issues discussed in this report with respect to affordable housing; housing; urban design; inclusive design; sustainable development; and transport.

for further information contact GLA Planning Unit:

██████████, **Head of Development Management (acting)**

██████████ email ██████████@london.gov.uk

██████████, **Principal Strategic Planner**

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██████████, **Senior Strategic Planner (case officer)**

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