

DELEGATED DECISION

- Please select each of the categories that enables this application to be determined under delegated powers
 - Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.

APPROVAL RECOMMENDED: GENERAL

Select an Option

1.	No valid planning application objection in the form of a petition of 20 or more signatures, has been received	☐
2.	Application complies with all relevant planning policies and is acceptable on planning grounds	☐
3.	There is no Committee resolution for the enforcement action	☐
4.	There is no effect on listed buildings or their settings	☐
5.	The site is not in the Green Belt (but see 11 below)	☐

REFUSAL RECOMMENDED: GENERAL

6.	Application is contrary to relevant planning policies/standards	☐
7.	No petition of 20 or more signatures has been received	☐
8.	Application has not been supported independently by a person/s	☐
9.	The site is not in Green Belt (but see 11 below)	☐

RESIDENTIAL DEVELOPMENT

10.	Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha	☐
11.	Householder application in the Green Belt	☐

COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT

12.	Change of use of retail units on site less than 1 ha or with less than 1000 sq. m other than a change involving a loss of A1 uses	☐
13.	Refusal of change of use from retail class A1 to any other use	☐
14.	Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.	☐

CERTIFICATE OF LAWFULNESS

15.	Certificate of Lawfulness (for proposed use or Development)	☐
16.	Certificate of Lawfulness (for existing use or Development)	☐
17.	Certificate of Appropriate Alternative Development	☐

CERTIFICATE OF LAWFULNESS

18.	ADVERTISMENT CONSENT (excluding Hoardings)	☐
19.	PRIOR APPROVAL APPLICATION	☐
20.	OUT-OF-BOROUGH OBSERVATIONS	☐
21.	CIRCULAR 18/84 APPLICATION	☐
22.	CORPSEWOOD COVENANT APPLICATION	☐
23.	APPROVAL OF DETAILS	☐
24.	ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where the Heads of Terms have already received Committee approval	☐
25.	WORKS TO TREES	☐
26.	OTHER (please specify)	☐

The delegation powers schedule has been changed. Interim Director of Planning, Regeneration & Public Realm can determine this application

Case Officer:

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informative's are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DETAILS SHOULD BE USED IN THE PS2 RETURNS ODPM

Item No. **Report of the Head of Development Management and Building Control**

Address: WHITEHOUSE NORTHWOOD ROAD HAREFIELD

Development: Demolition of existing structures and erection of a replacement single storey bungalow, hardstanding, access track and associated hard and soft landscaping.

LBH Ref Nos: **66100/APP/2023/1506**

Drawing Nos: WH/H/23/PL/LP01
 WH/H/22/PL/L01
 WH/H/22/PL/L10
 WH/H/22/PL/L20
 WH/H/22/PL/L10
 WH/H/23/PL/L10B Rev. B
 WH/H/23/PL/L20
 WH/H/23/PL/L21
 WH/H/23/PL/L01 Rev. A
 Planning Statement, Ref: 21-141

Date Plans received: 25-05-23 **Date(s) of Amendments(s):**

Date Application valid 25-05-23

1. SUMMARY

The proposed development involves the replacement of a single storey building used as a general store/farm office/part time residence for up to 50 days per year, with a new single storey bungalow. The site is located in the Green Belt and involves the replacement of a building with a materially larger one as well as a change of use from a Sui-Generis use to a residential (C3) use.

The proposed development would constitute as inappropriate development in the Green Belt, which by definition is harmful. It would have a significantly greater spatial and visual effect on the openness of the Green Belt when compared to the existing single storey barn at the site. The harm to the openness of the Green Belt carries substantial weight. It is considered that the very special circumstances necessary to justify granting planning permission do not exist.

The application site lies in a rural location with very limited access to the range of services and facilities required to support the proposed residential development. As a result, future occupiers of the proposed dwelling would be highly dependent on the need to travel by means of private car. The principle of the development in this location is therefore unacceptable as the proposal would fail to provide sustainable transport choices.

The proposed development, by virtue of its siting, scale, width, mass, height and associated paraphernalia, would cause unacceptable harm to the character, appearance and visual amenities of the area. In addition, it has not been demonstrated through submission of appropriate assessments/reports that the proposal would not harm significant trees. The potential harm to the trees at the site would cause unacceptable harm to the character and visual amenity of the area. Furthermore, an ecology report has not been submitted to demonstrate no harm to protected species would be caused.

It is recommended that the application is refused for the reasons set out in this delegated report.

2. RECOMMENDATION

REFUSAL for the following reasons:

1. NON2 Inappropriate development in the Green Belt

The proposed development constitutes inappropriate development which is, by definition, harmful to the Green Belt and would have an adverse impact on the openness of the Green Belt. In the opinion of the Local Planning Authority, there are no very special circumstances that would clearly outweigh the harm caused to the Green Belt. The proposed development is therefore contrary to Policy EM2 of the Hillingdon Local Plan: Part One- Strategic Policies (2012), Policy DMEI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy G2 of the London Plan (2021) and Section 13 of the National Planning Policy Framework (2021).

2. NONSC Unsustainable location

By virtue of its location and its remoteness from existing services and facilities and, in particular, from existing infrastructure in the area, the proposal represents an environmentally unsustainable form of development. In addition, the proposed development fails to promote opportunities to travel by non-car based modes of travel and it fails to provide safe, and suitable access for all users. The proposal is therefore contrary to Policy DMT 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy T3 of the London Plan (2021) and Sections 2 and 9 of the National Planning Policy Framework (2021).

3. NON2 Harm to the character and appearance of the area

The proposed development, by virtue of its siting, scale, width, mass, height and associated paraphernalia, would appear as an incongruous and highly conspicuous form of development that would be at odds with the rural setting of the site. The proposal would therefore cause unacceptable harm to the character, appearance and visual amenities of the area, contrary to Policy BE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012), Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies D1, D3 and D4 of the London Plan (2021) and the National Planning Policy Framework (2021).

4. NON2 Harm to trees

In the absence of an Arboricultural Impact Assessment, Method Statement and Tree Protection Plan, it has not been demonstrated that the proposed development could be constructed without undue loss of trees at the site which currently provide high visual amenity value. The potential harm caused to the trees would cause unacceptable harm to the character, appearance and visual amenity of the area. The proposal would therefore be contrary to Policy BE1 of the Hillingdon Local

Plan: Part One Strategic Policies (2012), Policies DMHB 11, DMHB 12 and DMHB 14 of the Hillingdon Local Plan Part 2: Development Management Policies (2020), Policy G7 of the London Plan (2021) and the National Planning Policy Framework (2021).

5. NON2 Harm to protected species

In the absence of a preliminary ecology report, there is insufficient information to demonstrate that the proposed development would not cause any harm to protected species (which includes bats). The proposal therefore fails to demonstrate that no harm would be caused to protected species and their habitats, contrary to Policy G6 of the London Plan (2021), Policy DME1 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2021).

INFORMATIVES

1. I52 Compulsory Informative (1)

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

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

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service.

a) We have however been unable to seek solutions to problems arising from the application as the principal of the proposal is clearly contrary to our statutory policies and negotiation could not overcome the reasons for refusal.

3. I74 Community Infrastructure Levy (CIL) (Refusing Consent)

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012.

For more information on CIL matters please visit the planning portal page at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMEI 10	Water Management, Efficiency and Quality
DMEI 7	Biodiversity Protection and Enhancement
DMH 2	Housing Mix
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G2	(2021) London's Green Belt
LPP G3	(2021) Metropolitan Open Land
LPP G7	(2021) Trees and woodlands
LPP HC1	(2021) Heritage conservation and growth

LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF13	NPPF 2021 - Protecting Green Belt Land
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF5	NPPF 2021 - Delivering a sufficient supply of homes
NPPF9	NPPF 2021 - Promoting sustainable transport

3. CONSIDERATIONS

3.1 Site and Locality

The site is located to the north-east of the village of Harefield on the north-west side of Northwood Road. To the south-west of the site is Roundwood House, which is a substantial detached residential dwelling in spacious grounds. To the north and west of the site are open fields.

The contains a single storey detached building. The building contains a garage, store and kitchen/living/bed space. The ridge line of the existing building runs approximately north-west to south-east.

The existing property was granted a Certificate of Lawfulness for an existing use on 07/08/09 (application ref. 66100/APP/2009/1268) for 'Use of existing single storey building as store, garage, office and part-time residence for up to 50 days a year'.

The majority of the site is located within the 100m zone around the line of a regional high pressure gas pipeline which runs to the north of the site.

The site is located within the Green Belt and has a PTAL score of 1.

3.2 Proposed Scheme

The proposed development involves the replacement of a single storey building used as a general store/farm office/part time residence for up to 50 days per year, with a new single storey bungalow. It includes associated hardstanding and three car parking spaces.

3.3 Relevant Planning History

66100/APP/2022/2374 WHITEHOUSE NORTHWOOD ROAD HAREFIELD

Change of use of White House from a store, garage, office and part-time residence (for up to 50 days a year) to a Class C3 dwellinghouse

Decision: 06-01-2023 Approval

66100/APP/2014/548 WHITEHOUSE NORTHWOOD ROAD HAREFIELD

Change of use from B1 (Offices) to C3 (Dwellinghouses) to create one self contained flat (Prior Approval)

Decision: 02-05-2014 Refusal

66100/APP/2009/1268 WHITEHOUSE NORTHWOOD ROAD HAREFIELD

Use of existing single storey building as store, garage, office and part-time residence (for up to 50 days a year) (Application for a Certificate of Lawfulness for an existing use or operation or activity).

Decision: 07-08-2009 Approval

Comment on Planning History

The relevant planning history attached to this site is referenced above.

4. Advertisement and Site Notice

4.1 Advertisement Expiry Date: Not applicable

4.2 Site Notice Expiry Date: Not applicable

5. Comments on Public Consult

EXTERNAL CONSULTEES:

9 neighbouring properties were consulted by letters dated 2nd June 2023. 4 additional neighbouring properties were consulted on 18th July 2023. A site notice was displayed on 8th June 2023 and a press notice was published on 26th July. The consultation period expired on 16th August 2023. No representations were received.

CADENT GAS:

After receiving the details of your planning application at Whitehouse Northwood Road Harefield UB9 as we have completed our assessment. We have no objection to your proposal from a planning perspective.

INTERNAL CONSULTEES:

COUNCIL'S ACCESS OFFICER: This proposal for the demolition of existing structures and erection of a replacement single-storey bungalow has been assessed against London Plan policy D7. No concerns are raised subject to the following conditions attached to any grant of planning permission:

Prior to any works on site above damp proof course level, details of step free access via all points of entry and exit shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building.

Reason: To ensure housing of an inclusive design is achieved and maintained in accordance with Policies D5 and D7 of the London Plan (2021).

The dwelling hereby approved shall accord with the requirements of Policy D7 of the London Plan and shall not be occupied until certification of compliance with the technical specifications for an M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, has been submitted to, and approved in writing, by the Local Planning Authority. All such provisions must remain in place for the life of the building.

Reason: To not only allow the Building Control body to require the development to comply with the optional Building Regulations standards, but to also ensure the appropriate quantity and standard of accessible and adaptable housing is constructed and maintained in accordance with policy D7 of the London Plan.

PLANNING OFFICER RESPONSE: Policy D7 of the London Plan (2021) requires for at least 10% of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings', with all other dwellings meeting Category M4(2) 'accessible and adaptable dwellings'. To ensure that the proposed development meet this requirement, it is proposed that the Access Officer's recommended conditions is revised to the proposed dwelling meets Building Regulation Category M4(3).

COUNCIL'S HIGHWAYS OFFICER:

There are no envisaged transport/highway related implications related to this replacement bungalow based on the proposed '3 parking space' provisions within the site envelope, the satisfactory reconfiguration of the established access road and the anticipated negligible variance in activity between the existing and proposed residential use. In particular, the recently approved CoU of the 'White House' to a dwellinghouse (66100/APP/2022/2374) further supports the principle of residential development. The only demands would be related to the provision of 1 'active' electric vehicle charging point with 2 commensurate 'passive' provisions together with 2 secure and accessible cycle spaces which are feasible demands and hence can be secured by way of condition. There are no further observations.

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan (2020) Policies DMT 1, DMT 2 & DMT 6 and Policies T4 and T6 of the London Plan (2021).

6. Local Plan Designation and London Plan

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

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.HE1 (2012) Heritage

Part 2 Policies:

DMEI 10 Water Management, Efficiency and Quality

DMEI 7 Biodiversity Protection and Enhancement

DMH 2 Housing Mix

DMHB 11 Design of New Development

DMHB 12 Streets and Public Realm

DMHB 14 Trees and Landscaping

DMHB 15 Planning for Safer Places

DMHB 16 Housing Standards

DMHB 18 Private Outdoor Amenity Space

DMT 1 Managing Transport Impacts

DMT 2 Highways Impacts

DMT 5 Pedestrians and Cyclists

DMT 6 Vehicle Parking

EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains

LPP D3 (2021) Optimising site capacity through the design-led approach

LPP D4 (2021) Delivering good design

LPP D5 (2021) Inclusive design

LPP D6 (2021) Housing quality and standards

LPP D7 (2021) Accessible housing

LPP DF1 (2021) Delivery of the Plan and Planning Obligations

LPP G2 (2021) London's Green Belt

LPP G3 (2021) Metropolitan Open Land

LPP G7 (2021) Trees and woodlands

LPP HC1 (2021) Heritage conservation and growth

LPP T5 (2021) Cycling

LPP T6 (2021) Car parking

LPP T6.1 (2021) Residential parking

NPPF11 NPPF 2021 - Making effective use of land

NPPF12 NPPF 2021 - Achieving well-designed places

NPPF13 NPPF 2021 - Protecting Green Belt Land

NPPF14 NPPF 2021 - Meeting the challenge of climate change flooding

NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF5	NPPF 2021 - Delivering a sufficient supply of homes
NPPF9	NPPF 2021 - Promoting sustainable transport

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

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

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

The West London Waste Plan (2015)

The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

7. MAIN PLANNING ISSUES

7.1 Impact on the amenities of the occupiers of neighbouring residential properties

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties or onto private open spaces.

There would be a separation distance of approximately 30 metres between the proposed dwelling and the nearest residential property at Roundwood House. The proposed dwelling would be set-in from the shared boundary with Roundwood House by approximately 10 metres. Given these separation distances, it is considered that the proposed development would not unduly impact on the living conditions of neighbouring occupiers, in respect to light, outlook, privacy, sense of enclosure or otherwise.

The proposal would therefore accord with Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), in regard to neighbouring residential amenity. However, this would not override the harm identified elsewhere in this report.

7.2 Impact on Street Scene

Paragraph 126 of the NPPF (2021) seeks the creation of high quality, beautiful and sustainable buildings. Parts b) and c) of paragraph 130 of the NPPF (2021) states that planning policies and decisions should ensure that developments are visually attractive as a result of good architecture and are sympathetic to local character and history, including the surrounding built environment.

Policies D3 and D4 of the London Plan (2021) require development proposal to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.

Policy BE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012) seeks a quality of design in all new development that enhances and contributes to the area in terms of form, scale and materials; is appropriate to the identity and context of the townscape; and would improve the quality of the public realm and respect local character.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that new development will be required to be designed to the highest standards and incorporate principles of good design. Policy DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development should be well integrated with the surrounding area.

The application site is located in Harefield comprising open fields and a modestly sized single storey structure and outbuildings. The characteristics of the site is reflective of its rural setting and Green Belt designation. Whilst it is observed that there is housing to the south-west, in contrast, to the north-east is predominately open fields interspersed with limited pockets of development. It is considered that the application site acts an important buffer between the open fields to the north-east and the housing to the south-west of Northwood Road.

The proposed dwelling, by virtue of its scale, width, mass and height, would represent a significant increase in volume to the existing single storey structures at the site. It is considered that the proposed residential development would appear incongruous and completely at odds with the rural setting of the site. This, in turn would have a negative impact on the character, appearance and visual amenity of the area.

The residential nature of the proposed development would have a profound effect to the appearance of the site and how it is perceived in the landscape. Whilst there are trees around the perimeter of the site, views of the upper floor and roof form of the proposed dwelling would nevertheless be visible from public vantage points.

Consequently, the proposal would result in a loss of openness which would be harmful to the character and appearance of the area.

Having regard to the above, it is considered that the proposed development would cause significant harm to the character and appearance of the area. The proposal therefore conflicts with Policy BE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012), Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies D1, D3 and D4 of the London Plan (2021) and the NPPF (2021).

7.3 Traffic Impact/Pedestrian Safety

Covered in the following section of this report.

7.4 Carparking & Layout

ACCESS, PARKING AND HIGHWAY SAFETY:

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway, junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development proposals must comply with the parking standards outlined in Appendix C, Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity.

The site would be accessed from an existing vehicle crossover emerging onto Northwood Road. The Council's Highways Officer has raised no objection to this access arrangement. Notwithstanding, if this application had been recommended for approval, a condition would have been secured to ensure that adequate visibility splays are achieved. Also, a condition would have been secured requiring details in respect to site gates/entrances to be submitted to the Council for consideration. Planning Officers would expect vehicle/electric gates to be set-back from the private track to avoid cars queuing on the private track whilst waiting for the gates to open.

The maximum requirement for a house is for up to 2 car parking spaces to be provided on-site to comply with the adopted parking standard as set out in Appendix C, Table 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). The submitted plans shows three on-site car parking spaces would be provided. The Council's Highways Officer has raised no objection to this overprovision, from a parking and highway safety perspective. However, this overprovision in the number of car parking being provided, means that the proposal would fail to be air quality neutral, contrary to Policy SI 1 of the London Plan. This matter is discussed in further details

In line with Policy T6.1 of the London Plan (2021), there is a requirement for a minimum of 20% 'active' electric vehicle charging points provision within the final parking quantum of development, with all remaining spaces being designated as 'passive' provisions. This could have been secured by condition, if this application had been recommended for approval.

In terms of vehicle traffic generation, it is considered that any uplift would be de minimis and therefore could be absorbed within the local road network without notable detriment to traffic congestion and road safety.

Subject to conditions, it is considered that the proposal would not exacerbate the demand for street parking or prejudice highway safety, in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

BICYCLE PROVISION:

Policy DMT 5 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires development proposals to provide a provision of cycle parking in accordance with the standards set out in Appendix C, Table 1.

In this case, two cycle spaces would need to be accommodated within the site to comply with the cycle parking standards set out in Appendix C, Table 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). No details in respect to covered cycle store provision has been provided with this application. However, this matter could have been addressed by a condition, if this application had been recommended for approval.

WASTE COLLECTION:

The Council's Highways Officer has commented that in order to conform to accepted 'waste collection distances' from the public highway, the storage area should be positioned within 10 metres of a refuse vehicle. No details in respect to refuse and recycling facilities have been submitted with this application. However, these details could have been secured by condition, if this application had been recommended for approval.

Subject to the above condition, it is considered that the proposed dwelling would be able to provide a convenient location for refuse and recycling facilities which would conform to the Council's waste collection standards as set out in Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

7.5 Urban Design, Access and Security Considerations

INTERNAL AMENITY SPACE PROVISION:

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.

Policy D6 of the London Plan (2021) sets out the requirements for the gross internal floor area of new dwellings at a defined level of occupancy. Table 3.1 of the London Plan (2021) set outs the same gross internal area space/
requires double bedrooms to have a floor area of at least 11.5 square metres, and for single bedrooms to have a floor area of at least 7.5 square metres.

With a gross internal floor area of 100 square metres, the proposed dwelling would comply with the London Plan's minimum 70 square metre requirement. Both of the proposed double bedrooms would also comply with the London Plan's standards. The proposed dwelling would be dual aspect with all the habitable rooms being served by windows in the front or rear elevations of the building, thus providing future occupiers with a reasonable level of natural light and outlook.

On the above basis, it is considered that the proposed dwelling would provide satisfactory internal living conditions for future occupants, in accordance with Policy D6 of the London Plan (2021) and Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

EXTERNAL AMENITY SPACE PROVISION:

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3.

Table 5.3 states that houses with two bedrooms houses should be provided a minimum of 60 square metres of private usable amenity space. Although the submitted plans do not show the full extent of the external amenity space that would be afforded to the future occupiers of the proposed dwelling, the overall plot size of the site is of a sufficient size to conform with the Local Plan's private amenity standards. If this application had been recommended for approval, a condition would have been secured requiring a landscaping plan to be submitted, specifically detailing the areas that would be used as private amenity space.

Also, full details of enclosure and boundary treatment would have been secured by condition to

ensure that an adequate provision of 'private' external amenity space is afforded to future occupiers and to ensure any boundary treatment would respect the rural setting in so far as possible. However, this is notwithstanding the harm that would be caused to the openness of the Green Belt by the paraphernalia associated with the external amenity space (refer to section 7.6 of the report for further details).

Subject to the above condition, the proposed development would accord with Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

INCLUSIVE DESIGN AND ACCESS:

Policy D5 of the London Plan (2021) seeks to ensure development proposals achieve the highest standards of accessible and inclusive design. Policy D7 of the London Plan (2021) requires for at least 10% of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings', with all other dwelling meeting Category M4(2) 'accessible and adaptable dwellings'.

If this application had been recommended for approval, conditions would have been secured in respect to step-free access and for the proposed dwelling to meet Building Regulation M4(3).

7.6 Other Issues

PRINCIPLE OF DEVELOPMENT:

Inappropriate Development in the Green Belt:

Policy EM2 of the Local Plan: Part One (2012) notes that any proposals for development in the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

Policy DMEI 4 of the Local Plan: Part Two (2020) notes inappropriate development in the Green Belt will not be permitted unless there are very exceptional circumstances. Extensions and redevelopment of sites will also only be permitted where this would not have a greater impact on the openness of the Green Belt as well as the purposes of including land within it, than the existing development, having regard to:

- the height and bulk of the existing building on site,
- the proportion of the site that is already developed,
- the footprint, distribution and character of the existing buildings on site,
- the relationship of the proposal with any development on the site that is to be retained; and
- the visual amenity and character of the Green Belt.

Paragraph 147 of the NPPF (2021) sets out that inappropriate development, is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 149 of the NPPF (2021) states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless they fall within the given list of exceptions. A number of exceptions to this are listed, including exceptions (d) and (g)

Exception (d) states: "the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;"

The proposed development would result in the replacement of a single storey building with a new dwelling in a different use. The proposed development would therefore not meet the requirements of paragraph 149 d) of the NPPF.

The proposal would involve the demolition of existing structures in replacement of a new dwelling. The submitted Planning Statement claims that there was a two-storey dwelling located on the site in the 1960s before being demolished. However, the current single storey building has been on the site for over 50 years and it is regarded to be the 'existing development'. So, regardless of the suggestion that there was a two-storey dwelling on the site prior to this, the proposed development would result in a greater impact on the openness of the Green Belt than the existing development. Furthermore, the proposed new dwelling would be of a different use to the existing structures at the site.

Exception g) states: "limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."

The definition of previously developed land is set out in the glossary to the NPPF and includes land occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

The submitted Planning Statement is claiming that the site used to contain a two-storey dwelling in the 1960s, before being demolished would affect the assessment of impact on the openness of the Green Belt. However, the current single storey building has been on the site for over 50 years and it is regarded to be the 'existing development'. So, regardless of whether there was a two-storey dwelling on the site prior to this, the proposed development would result in a greater impact on the openness of the Green Belt

Having regard to the above circumstances, and noting the nature of the proposed development, it is considered that the exceptions set out by paragraph 149 of the NPPF (2021) do not apply. Consequently, the proposal would represent inappropriate development in the Green Belt. It would therefore fail to accord with Policy EM2 of the Hillingdon Local Plan: Part One- Strategic Policies (2012), Policy DME1 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy G2 of the London Plan (2021) and the NPPF (2021).

Notwithstanding this, regard must be given to the second limb of paragraph 149 g) of the NPPF (2021), which requires consideration to the effect of the proposed development on the openness of the Green Belt.

Impact on Openness of the Green Belt:

The essential characteristics of Green Belt is its openness and its permanence. In the Court Judgement *Turner v SSCLG & East Dorset Council*, it was established that openness has both a visual and spatial quality.

Based on the submitted details, the proposed dwelling would have a total footprint of 116 square metres, compared to 53 square metres of the existing single storey building used as a general store/farm office/part time residence for up to 50 days per year. No volume calculations of the proposed dwelling have been submitted. However, given form, together with its width and depth, the volume of the dwelling would be greater than the existing single storey barn. Notwithstanding this, it is considered that the assessment of impact on openness, in both a spatial and visual sense, involve more than a calculation of footprint or volume.

The proposed dwelling would significantly impinge on the visual and spatial quality compared to the existing structures at the site which forms the benchmark against which to consider the impact on openness.

The submitted Planning Statement suggests that a two-storey dwelling was located on the site in the 1960s before being demolished. However, the current single storey building has been on the site for over 50 years and it is regarded to be the 'existing development'. So, regardless of the fact that there was a two-storey dwelling on the site prior to this, the proposed development would result in a greater impact on the openness of the Green Belt than the existing development.

The proposed dwelling, by virtue of its size, scale and height, would have an overall greater visual and physical presence than the existing structures. The remaining areas of the site form part of the garden curtilage of the proposed dwelling. Given the size of the curtilage, it is likely that the future occupants of the proposed dwelling would increase domesticity and the spread of paraphernalia (e.g. outdoor furniture, play equipment and washing lines). Thus, resulting in the proposed development having a greater effect on openness, which would be readily apparent when viewing the site from public vantage points.

There is no evidence to suggest that the proposal would contribute towards an identified affordable housing need.

In light of the foregoing factors, it is considered that the proposed development would have a significantly greater spatial and visual effect on the openness of the Green Belt when compared to the existing development at the site. The proposed development, by virtue of its plot coverage, size, scale, mass and height, would have a substantially harmful effect on the openness of the Green Belt. The proposal would therefore conflict with Policy EM2 of the Hillingdon Local Plan: Part One- Strategic Policies (2012), Policy DMEI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy G2 of the London Plan (2021) and the NPPF (2021).

The Council is currently able to demonstrate a five-year housing supply. As such, the "titled balance" as set out in paragraph 11(d) of the NPPF (2021) is not engaged.

Very Special Circumstances:

The proposed development constitutes inappropriate development in the Green Belt, which by definition is harmful. Also, the proposed development would cause harm to the openness of the Green Belt, which should be given substantial weight. The proposed development would therefore be contrary to the development plan taken as a whole. Having regard to the above assessment, it is considered that there are no material considerations that would clearly outweigh the harm to the Green Belt. Consequently, very special circumstances necessary to justify the proposed development do not exist.

Unsustainable location:

Policy GG2 of the London Plan (2021) outlines development must prioritise sites which are well-

connected to existing or planned public transport, as well as plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land. Paragraph 1.2.4 outlines that this means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks. Policy T1 of the London Plan (2021) confirms that development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.

Policy T2 of the London Plan outlines that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. It also confirms that they should reduce the dominance of vehicles on London's streets when moving and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. Policy T4 outlines that development proposals should reflect and be integrated with current and planned transport access, capacity, and connectivity. Importantly, it also clarifies that the cumulative impacts of development on associated effects on public health should be taken into account. These policies have all been introduced to reduce the harmful externalities associated with car dependency, which include increased congestion, carbon emissions, air pollution, noise pollution, traffic accidents, social isolation, stress on public services and health issues associated with inactivity.

At a local level, Policy T1 of the Local Plan: Part 1 (2012) outlines that the Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. Furthermore, all development should encourage access by sustainable modes and include good cycling and walking provision, whilst the Council will also ensure access to local destinations which provide services and amenities. Policy DMT 1 of the Local Plan: Part 2 (2020) outlines that for development to be acceptable they are required to be accessible by public transport, walking and cycling from the services and facilities necessary to support the development. Development is also required to maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users.

The site is in a remote location with a PTAL score of 1 (Very Poor). The nearest bus stop is a 4 minute walk from the site, but buses only operates with 20- or 30-minute intervals depending on the time of day. There is also no service after 9pm. There is no tube or train station within reasonable walking distance, with Denham Station the closest station (20 mins with a hybrid walk and bus journey). The walk to Harefield town centre is approximately 1 mile, however this is only a local centre with limited shops and services.

Whilst the proposal might not in itself generate a large number of traffic movement, it would nevertheless result in unsustainable journeys being made due to the rural location of the site. Accordingly, the principle of development is not acceptable in this unsustainable location because future occupiers of the proposed dwelling would be reliant on the private motor vehicle to meet their basic need. As such, the proposal would fail to provide sustainable transport choices, contrary to Policy T1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy GG2 of the London Plan (2021) and the NPPF (2021).

TREES AND LANDSCAPING:

Policy G7 of the London Plan (2021) states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing

value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system.

Policy DMHB 14 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) states that:

- A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.
- C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.
- D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

The trees at the site make a positive contribution to the character and appearance of the area in that they form part of the intrinsic value of the surrounding Green Belt. Whilst the trees are not covered by a Tree Preservation Order or otherwise protected, they nevertheless are of public amenity value, as they make a positive contribution to the rural character of the area.

An Arboricultural Report to the British Standard 5837:2021 (Trees in Relation to Design, Demolition and Construction- Recommendations), has not been submitted. The submitted plans indicate the location of the existing trees at their and their root protection area; however, this has not been verified by a qualified arboriculturalist. Consequently, Officers are unable to fully assess the existing trees at the site, category classification and their health. In the absence of such information, it cannot be determined whether the proposed development can be constructed without harming the health of the trees at the site, which are shown on the submitted plans as being retained.

For the reason above, it is considered that the proposed development would adversely affect the verdant character and appearance of the area, as a result of the effect on existing trees at the site. It would not accord with Policies D3, D4 and G7 of the London Plan (2021), Policies DMHB 11, DMHB 12 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the NPPF (2021), in this respect.

IMPACT ON PROTECTED SPECIES:

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.

Circular 6/2005: Biodiversity and Geological Conservation- Statutory Obligations and Their Impact Within The Planning System states that where there is a reasonable likelihood of a protected species being present and affected, a survey should be carried out before planning permission is granted. The Circular also advises that surveys should only be required by a planning condition in exceptional circumstances.

The application site comprises grassland and trees. According to the Council's GIS, the site is in

close proximity to a designated Nature Conservation Site of Borough Grade II or Local Importance: Shepherds Hill (located to the east of the site). Given these circumstances, it is considered that the site is located within habitat that matches that where bat roosts have previously been found in the Borough

A Preliminary Ecology Report has not been accompanied with this application, despite one being requested by Officers. In the absence of such report, there is insufficient information to demonstrate that the proposed development, would not cause any harm to protected species (which includes bats).

It is therefore considered that the proposal would have an unacceptable effect on biodiversity interest, in terms of protected species. As a result, it would not comply with Policy G6 of the London Plan, Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the NPPF (2021).

FLOOD RISK AND DRAINAGE:

Policy SI 12 of the London Plan (2021) states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 of the London Plan states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

Policy DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

The application site is in Flood Zone 1 where the risk of flooding from rivers or seas is low. As such, all forms of development, including 'more vulnerable' uses, are acceptable in terms of fluvial and tidal flood risk in this location.

If this application had been recommended for approval, a condition could have been secured requiring a sustainable water management scheme, that incorporates sustainable urban drainage systems (SuDS), to be submitted to the Council for consideration. Subject to such a condition, it is considered that the proposed development would not increase the risk of surface water flooding on the site or elsewhere in accordance with Policies SI 12 and SI 13 of the London Plan (2021) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2- Development Management Policies (2020).

SUSTAINABLE CONSTRUCTION AND ENERGY/WATER CONSERVATION:

Policy SI 2 of the London Plan states that residential development should achieve at least 10% beyond Building Regulation 2013.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in

accordance with London Plan targets.

If this application had been recommended for approval, a condition could have been secured requiring the proposed dwelling to achieve an energy efficiency standard of 10% CO2 improvement over Building Regulations requirements Part L 2013 (TER Baseline).

Also, a condition could have been secured requiring the proposed dwelling to achieve as a minimum, a water efficiency standard of no more than 110 litres per person per day maximum water consumption (to include a fixed factor of water for outdoor use of 5 litres per person per day in accordance with the option requirement defined within Approved Document G of the Building Regulations).

Subject to the above conditions, the proposal would be compliant with Policies DMEI 2 and DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy SI 2 of the London Plan (2021) in respect of sustainable construction and energy/water conservation matters.

AIR QUALITY/EMISSIONS:

Policy SI 2 of the London Plan require all development to be air quality neutral.

As previously stated, in order to achieve, air quality neutral the number of car parking would have to be reduced to two spaces. This matter could have been resolved by condition. Also, a condition requiring the the submission an Air Quality Assessment to be submitted to the Council for consideration would have been secured, if this application had been recommended for approval.

COMMUNITY INFRASTRUCTURE LEVY:

The Council adopted its own Community Infrastructure Levy (CIL) on August 1st 2014, and the Hillingdon CIL charge for residential developments is £95 per square metre of additional floorspace. This is in addition to the Mayoral CIL charge of £60 per square metre. CIL rates are index linked. The proposal involves the erection of a new dwelling and would therefore be liable to pay CIL.

8. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
The London Plan (March 2021)
Technical Housing Standards - Nationally Described Space Standard (March 2015)
Hillingdon Local Plan Accessible Hillingdon Supplementary Planning Document (September 2017)
National Planning Policy Framework (July 2021)
Circular 06/2005: Biodiversity and Geological Conservation (August 2005)

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