



Town and Country Planning Act 1990
Section 78 Planning Appeal

London Borough of Hillingdon Appeal Statement

Appeal By:

Mr Peter Timms

Proposal:

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

Appeal Site:

Whitehouse Northwood Road Harefield

Our Ref: 66100/APP/2023/1506

Your Ref: APP/R5510/W/24/3338381

Comments on additional reports and Draft NPPF

Arboricultural Impact Assessment

- 1.1 The submitted Arboricultural Impact Assessment indicates that a number of trees would be removed from the site. There would also be some pruning works carried out to a number of trees. The trees which involve works or removal would be Category B and C which are moderate and low quality. The Arboricultural Assessment does not provide sufficient justification for their removal other than to facilitate the development.
- 1.2 The report also indicates that Appendix A provides a copy of the Tree Plan however this does not appear to be included within the appeal information. From review of the proposed site plan, the LPA do also have concerns that some of the excavation works associated with the proposal could lead to further trees being removed. Whilst the Arboricultural Impact Assessment does indicate most of the trees are to be retained, the proximity of the development would put added pressure on the long-term future of other trees not ear-marked for removal.
- 1.3 The LPA would therefore reiterate that Policy DMHB14 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) seeks to ensure retention of landscaping, trees and other natural features of merit. There would remain a public value to the protection of the trees on site and insufficient justification has been brought forward for their pruning or removal. As such, the LPA would retain our position that the loss of trees would be harmful to the verdant character and appearance of the area which contributes positively to the Greenbelt.

Preliminary Ecological Appraisal

- 1.4 As noted previously, no Ecological Appraisal had accompanied the original submission, and the site is considered to have features and habitat of ecological and geological value. The Appraisal notes the NPPF criteria in determining application
 - If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused
- 1.5 Whilst the Appraisal states that there is no evidence of bats using the outbuilding as a place of shelter, the site does lie within an area where bats have been recorded. The loss of grassland and trees would also impact the wider habitat and ecological value of the site. There are also concerns that badgers and hedgehogs may lose their habitat by the development works proposed including the additional ancillary access arrangements. For these reasons, the LPA would continue to have concerns regarding the ecological impact from the proposed works and stand by our initial decision to refuse on the impact on protected species and their habitat.

Changes to the NPPF (Draft)

- 1.6 On 30 July 2024 the Government published a consultation on proposed reforms to the National Planning Policy Framework (the Framework) and other changes to the planning system. It is recognised that the document forms a direction of travel from a National Policy perspective however the LPA would put limited weight at this stage, given that no final document has been published and the documentation remains at consultation phase.

