

Officers Report

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Case Officer: James Wells
Email: JWells@hillington.gov.uk
Date: 27th March 2023
Our Ref: 64458/PRC/2023/7

Dear N Ravi

RE: Conversion of extended property into 2 no residential flats

SITE: 28 STATION APPROACH SOUTH RUISLIP MIDDLESEX

I refer to your request for pre-application planning advice dated 23.01.23 and our subsequent meeting on 20.03.23 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Drawing Nos:	Location Plan	Received: 23rd January 2023
	PF-01 - Existing Plans	Received: 23rd January 2023
	PF-02 - Proposed Plans	Received: 23rd January 2023
	PF-03 - Proposed Plans	Received: 23rd January 2023

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The approximately 0.02ha site is located on the south-east side of Station Approach, approximately 10m north-east of its junction with Hardy Road. It is occupied by a two storey, terraced dwelling with a projecting bay window, a single-storey rear extension, a rear dormer window and an outbuilding to the rear. The dwelling is constructed in light brown brick with a gable, tiled roof. The area is mixed-use in character, with detached, semi-detached and terraced dwellings and flatted development and some

ground floor retail and commercial uses with office and residential uses above.

The site is not the subject of heritage policies. The site lies within the Hillingdon Air Quality Management Area, the A40 / South Ruislip Air Quality Focus Area, Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) of 2.

The Proposal

The pre-application seeks advice on the conversion of the existing dwelling to 2 x self-contained flats (1 x 1 bed and 1 x 2 bed). There are no extensions or external alterations proposed to the existing dwelling.

Planning Policy

Development Plan

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 London Plan (2021)

The West London Waste Plan (2015)

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.

The proposed development has been assessed against the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020), including Supplementary Planning Guidance, and all relevant material considerations, including The London Plan (2021) and national guidance.

Part 1 Policies:

PT1.BE1	(2012) Built Environment
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Other Policies

DMH 4	Residential Conversions and Redevelopment
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMCI 4	Open Spaces in New Development
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D6	(2021) Housing quality and standards

LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP GG4	(2021) Delivering the homes Londoners needs
LPP H1	(2021) Increasing housing supply
LPP T5	(2021) Cycling
LPP T6.1	(2021) Residential parking
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF5	NPPF 2021 - Delivering a sufficient supply of homes

Main Planning Issues

Principle of development

The application site is located in the developed area of the borough where new development is acceptable in principle subject to compliance with relevant development plan policies.

Policy DMH 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the redevelopment of dwellings into new blocks of flats will only be permitted where:

- i) it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped into flats;
- ii) On residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road for assessment purposes;
- iii) the internal floor area of the original building to be converted is at least 120 sqm; and
- iv) units are limited to one unit per floor for residential conversions.

The proposed development complies with Policy DMH 4 criteria iii) and iv). The area surrounding the application site includes flatted development but the pre-application does not provide detailed information to demonstrate that the proposed development will not result in more than 10% of properties being redeveloped into flats. Any future application should include evidence and calculations to demonstrate compliance with the requirements of Policy DMH 4 i) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), otherwise it may not be supported by the Council.

Design

Paragraph 134 of the NPPF (2021) notes the importance of achieving design which is appropriate to its context stating that 'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design taking into account any local design guidance and supplementary planning documents such as design guides and codes.'

Policy

Policy D3 of the London Plan (2021) requires that development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.

Policy GG4 of the London Plan (March 2021) seeks to ensure that more homes are delivered. Policy H1 of the London Plan (2021) promotes the optimisation of the potential for housing delivery on all suitable and available brownfield sites.

Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) requires that all new development achieves a 'high quality of design in all new buildings, alterations and extensions'.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding: · scale of development, considering the height, mass and bulk of adjacent structures; · building plot sizes and widths, plot coverage and established street patterns; · building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment;
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

Proposal

The proposed conversion of the existing dwelling into 2 x self-contained flats involves internal alterations to create a 1 x 1 bed flat on the ground floor and a 1 x 2 bed flat on the first floor, including habitable accommodation in the roof, but does not appear to involve any new, external alterations. On this basis, there are no concerns with the external design of the building itself, which would remain unchanged.

However, the paraphernalia required to accommodate two units on site do need to be carefully considered. This would involve the provision of vehicle parking, cycle stores and refuse and recycling storage. The submitted drawing shows the provision of three ad hoc parking spaces in the front garden (which raise questions with manoeuvrability), as well as refuse storage provision and cycle parking. Given that the site is mid-terrace the proposed cycle storage for the ground floor flat would raises concerns with its functionality, since it would be inconvenient for occupants to wheel their cycles through the flat. Therefore it is more likely that cycle parking would need to be accommodated. However this would need to be balanced with ensuring that the front garden is not cluttered and visually obtrusive within the street scene. Care would need to be given to this when submitted a proposal for planning permission.

The local plan permits a maximum 1.5 - 1 car space per 1-2 bedroom flat. Therefore 2 car parking spaces would be acceptable for the proposal and this reduction would reduce the appearance of clutter in the front garden. The introduction of soft landscaping would also assist in ameliorating the appearance of clutter, and should be considered in any future planning application. Details of the scale and appearance of any refuse storage and cycle parking enclosures should also be submitted with any planning application.

Amenity

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.

As the proposed conversion does not appear to involve any external alterations it should not adversely impact on the amenity, daylight and sunlight of adjacent properties.

Policy DMHB 16: Housing Standards of the Hillingdon Local Plan: Part Two - 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. To achieve this all residential development or conversions should meet or exceed the most up to date internal space standards, as set out in Table 5.1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

Both of the proposed flats appear at face value to exceed these minimum internal space standards and have adequate sized rooms. However based on the submitted section it does not appear that there is sufficient floor to ceiling heights of at least 2.5m. This would need to be considered.

It is noted that cars are proposed to be parked in front of the bedroom window of the ground floor flat. Defensible soft landscaped garden space should be incorporated to ameliorate any perceived or real loss of privacy and disturbance.

Policy DMHB 18: Private Outdoor Amenity Space of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that:

All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3.

The submitted drawings state that the existing rear garden, which provides approximately 42sqm of private outdoor amenity space, would be for the use of the 1 x 1 bed ground floor flat. The 1 x 2 bed first floor flat would not have any private outdoor amenity space, which would be contrary to the requirements of Policy DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and would not be supported by the Council. Balconies or terraces for the upper floor flat would not be appropriate, and would be out-of-character with the area.

Highways

The submitted drawings indicate that 3 off-street car parking spaces would be provided on the site frontage area. On that basis, the number of car parking spaces should not be an issue. However, there are concerns with manoeuvrability. This can be reduced to 2 off-street car parking spaces which would still comply with policy but enable more effective vehicle tracking. In respect to amenity it would also provide better opportunities for improved soft landscaping and the sensitive provision of refuse storage and cycle parking. An electric vehicle charging point should be provided to meet current policy requirements.

Other

Energy

Policies EM 5 and DMEI 2 of the Local Plan seek a contribution from all development to a reduction in carbon emissions and encourage the use of renewable energy. The potential for renewable energy technologies such as PV's and heat pumps as part of any future development should be explored.

Access

Any future planning application would need to provide plans detailing compliance with the

prescribed standards set out in Approved Document M to the Building Regulations 2010 (2015 edition), clearly detailing the required dimensions and clear access zones within entrance lobbies, passageways, living areas, bathrooms and bedrooms.

Crime Prevention

The design and layout should also have regard to secure by design principals. You may wish to contact the Metropolitan Police's Secure by Design Officer, PC Robert Palin who can be contacted on 020 8733 5245 or by e-mail on Robert.Palin@met.pnn.police.uk.

Planning Obligation and CIL (Mayor and LBH)

S106 PLANNING OBLIGATIONS

It is not considered that any planning obligations will be required.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

The Council adopted its own Community Infrastructure Levy (CIL) on August 1st 2014. The Hillingdon CIL charge for residential developments of 100sqm or more is £95 per square metre of additional floorspace. This is in addition to the Mayoral CIL charge of £60 per square metre of additional floorspace.

Application Submission

The Council has an adopted Local Planning Validation Checklist (June 2020), which sets out in full the documents required to accompany a planning application and is available on the Council's website.

Any future application would need to be supported by the following documentation:

- Location Plan and Block Plan;
- Existing and Proposed Floor Plans (including the location of neighbouring properties);
- Existing and Proposed Elevations;
- Existing and Proposed Roof Plan (whether as floor plans or within a block plan);
- Information to demonstrate compliance with the requirements of Policy DMH 4 i) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020);
- Hard and soft landscape plan;
- Details of the appearance and scale of any refuse storage or cycle parking enclosures; and
- Community Infrastructure Levy Form.

Should you require further information, please refer to the Council's website:

<https://www.hillingdon.gov.uk/apply-planning-permission>.

Conclusion

As set out in the above report. any future application should include information to demonstrate compliance with the requirements of Policy DMH 4 i) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), otherwise it may not be supported by the Council. There are other design matters for consideration and revisions contained within the main body of this report.

The 1 x 2 bed first floor flat would not have any private outdoor amenity space, which would be contrary to the requirements of Policy DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and could not be supported by the Council.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as

possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Follow Up Pre-application Meeting

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**James Wells
Planning Team Leader
Major Applications Team
London Borough of Hillingdon**

Planning Guarantee

For complex applications which are likely to exceed the statutory time frames, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all planning performance agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.