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To the Planning Inspectorate,
Room 3/07, Kite Wing,
Temple Quay House, 2 The Square,
Temple Quay, Bristol, BS1 6PN

Grounds of Appeal.

Re; proposed development, 1 x 3 bedroom two storey dwellinghouse and 2 x 1 bedroom terraced houses with associated parking and amenity space at 1 Alpha Road, Hillingdon, including the demolition of the existing bungalow at this address, (Hillingdon Council ref 41903/APP/2024/2570).

Dear Sir/ Madam,

Our client wishes to take this opportunity, after four previous much larger (refused) applications by other agents regarding this site, to provide purpose built accommodation for three households here. The proposals are, in many ways, not dis-similar to other nearby purpose built terraced housing developments that have been constructed on this road (and in particular the adjacent 1960s terraced block of 3 houses, numbers 3, 5 and 7 Alpha Road).

Visually, the proposed size of the new properties would only be a little larger than the size of the current chalet bungalow footprint here (with a first-floor added, replacing the current chalet bungalow loft rooms).

The current government's stated 'new homes in Hillingdon' targets are yet to be met by Hillingdon, eg, 2292 homes a year are currently required by government targets, whilst, since 2021, 795 homes per year were added to Hillingdon's housing stock (source, BBC News, January 30th 2025, their published figures reproduced in the Appendix), continue to reassure us regarding the possible 'approve-ability' of this scheme, to help meet these national and local housing targets..

We feel that our proposals would not detract from the appearance of the neighbouring properties or the existing street scene here.

Whilst the delegated planning officer has listed five reasons for refusal, we hope that the Planning Inspector will be able to fully consider each of these reasons in turn, independently.

We note that, whilst some of these reasons for refusal appear 'objective' reasons, we wish to ascertain if these particular issues, if the Planning Inspector were otherwise minded to approve this scheme, could be covered by a further planning condition, as has previously been found to be acceptable by Hillingdon Council Planning Department.

Whilst we understand that all planning officers are very busy, we were particularly disappointed in this instance that the delegated planning officer was unable or unwilling to engage with us in any polite, proactive way regarding this application- our email dated Monday November 18th, 2024, to Mr Chrysanthou's direct email address was never replied-to, and a

further switchboard telephone call received no response.

If a response had been received, a number of the stated objective reasons for refusal could have been addressed quickly, before any decision was published.

In light of the above, we are also particularly disappointed that in the 'refusal of planning permission' certificate, under 'Informatives', point 3 reads as follows..

'..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.'

Notwithstanding the above sentence/statement, we hope that the Inspector will equally bear in mind the following paragraph of Mr Chrysanthou's officer report (page 21), which helpfully states as follows..

' The site is located in the developed area of the borough where development is acceptable in principle, subject to compliance with other development plan policies. The principle of development for the creation of additional residential units in this location is considered to be acceptable in land use terms. However, this would be subject to an appropriate density, design, amenity and parking provision, and the proposal being in accordance with all of the relevant planning policies and guidance set out in the Development Plan. '

We hope that the Planning Inspector will be able to find in our favour regarding the reasons for refusal that could better be described as 'subjective', and where there is an objective reason for refusal currently, then, if possible consider approval of this current application with suitably phrased planning conditions.

We reiterate that the council's predominant reasons for refusal are (in our opinion) subjective, and may not stand up to considered scrutiny and we welcome the Inspector's considered opinion on the particular issues below.

Specific points re our Grounds for Appeal..

We hope that the inspector will be mindful of the following information when considering this appeal..

1. We are pleased to note that the council is satisfied that all three of these proposed houses would be able to meet the government's and the Mayor of London's technical housing standards for new houses / flats, re access, water, internal areas, room sizes, and outlook. The extra proposed dwellings would help the council to keep a family sized unit here whilst increasing the provision of new housing (thus helping the council to meet the government's recently publicised target of 2,292 new homes in Hillingdon each year).

Also, that the proposed on-site parking space provision and reduced hardstanding here meets Hillingdon Council's stated planning policies.

Also, that, as already highlighted, there would be no objection in principle to the intensification of the residential use of the site, providing that it accords with all relevant planning policies.

We also specifically note that the following requirements have been met (in no particular order)..

- a. neighbouring residential amenity (eg, 'no impact' stated by council)
- b. traffic impact and pedestrian safety
- c. car parking and layout
- d. potentially contaminated land (subject to a condition)

- e. shown landscaping (subject to a condition)
- f. private amenity space
- g. living conditions (bar easily amended ceiling heights, when merited)
- h. access (bar easily added larger ground floor wc to the 3 bedroomed home)
- i. bin store provision

2. The council's concerns (we believe) can be simplified/categorised as being related to the following...

a. size/ mass/ design of this development, as regards the council's stated policies (in our opinion, a subjective judgement)

b. four further stated reasons for refusal all tend to be more objective / prescriptive, but can all (in our opinion) be relatively easily met and be complied-with by a suitably-worded planning condition, in each case and whenever the Planning Inspector considers that such a planning condition is merited, after careful consideration, and if the Planning Inspector is on balance minded to approve this current application.

We welcome the inspectors considered thoughts re the following aspects of this appeal..

Reason 1.. 'Character and appearance.. The development, by reason of its height, siting, massing and design, would be incongruous, visually prominent and harmful to the character and appearance of the area and the visual amenities of the street scene. As such the proposed development is contrary to Policy BE1 of the Hillingdon Local Plan Part 1 - Strategic Policies (2012), Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020), Policy D3 of the London Plan (2021) and Paragraph 135 of the National Planning Policy Framework (2023)'

Proposed Height...

a. As mentioned above, we feel that the building can and does agree with the scale of surrounding properties, and its detailing follows the grain of the residential area here.

b. We feel that this design, if built, would be of a quality that would certainly not detract from the street-scene here, and we have taken time and care to show these proposals in context, with accurate 3d computer generated modelling of our proposal, and the volume of neighbouring properties. We hope that this information will help the planning inspector to make an informed opinion of these proposals.

c. With reference to the council's (subjective) assertion that the proposal is 'too tall', we notice that this planning report only references the adjacent height of the c1960s terrace of houses at 3, 5 and 7 Alpha Road. It seems disingenuous and unfair for this report to not reference the existing height of the other adjacent building at the corner of Alpha Road and Pole Hill Road. As can be seen on the application front elevation drawing 56B, and on the side elevation drawings shown on 55B (showing the heights of current ridges and hips beyond), our current proposed ridge height is designed to be 300mm lower than the highest ridge of this adjacent property. It would also be considerably lower than the ridge of the block of flats at 32A and 34 Pole Hill Road (approximately 15 metres away, situated to the north of this site).

d. Also with reference to the designed height, it can be seen that the proposed first-floor eaves/ gutter height aligns with the existing eaves and gutter height of the adjacent c1960s

terrace, and would thus clearly conform to the existing character and appearance of the area. From a designing point of view, we feel that this horizontal eaves detail is a far more apt visual recognition of 'local scale' here, and would welcome the Planning Inspector's own observations on this point.

e. The existing roof pitch of the existing chalet bungalow scales 37 degrees to the horizontal; our proposal mirrors and matches this elevational pitch, which also mirrors the pitch of the roof of the adjacent gable to the property on the corner of Alpha Road and Pole Hill Road. This pitch also matches a variety of roof pitches in close proximity along Pole Hill Road and Butler Street (both these adjacent roads are within 15m and 20m of this application site).

f. This proposed south-facing roof is eminently suitable to install carbon-saving photovoltaic panels (as illustrated), which would also help to provide 'free' electricity to the electric air-source heat pump systems proposed here (plan drawing 52B shows air source heat pump proposed positions in the rear garden); best practice is to install photovoltaic panels at 37 degrees, to gain slightly more (albeit via less winter sunshine) free electricity over winter months whenever low sunshine is available.

g. Whilst perhaps covered under 'design' too, we have chosen to propose a blue/grey slate-appearance roof here, for the following reasons..

i. Historically this blue slate roofing material was installed on the adjacent older properties here and on Pole Hill Road and Butler Street.

ii. The blue, smooth slate is a more suitable choice to integrate and match the colour of the proposed photo-voltaic roof panels here.

iii. The most recently built pair of houses are situated 2 properties away, at 11 and 13 Butler Street (30 metres distant), approved in 1998, council reference 52874/B/99/0653; these properties were approved with blue/grey slates, with very visible and attractive front porches benefitting from this materials choice. The block of flats at 32A and 34 Pole Hill Road, approved c2013-2020 also were approved with blue/grey slates (situated approximately 15 metres to the north of this site)



30 metres distant from 1 Alpha Road, view of approved slate roofing in Butler Street



approximately 35 metres distant, recently approved flats in Pole Hill Road (blue/grey slates)

We hope that the planning inspector may support our view that we have chosen a sensible design strategy here, to save carbon emissions here, and to match and contrast the existing roof ridge heights of a variety of neighbouring properties.

Proposed Siting...

a. Whilst 'siting' is stated in this reason for refusal, we are pleased to state that we can find no reference in the delegated planning officer's report that specifically finds fault and provides a reason for refusal on these grounds.

b. We would however, like to clarify that the proposed corner nearest to number 3 Alpha Road, is set forward by 0.9m (and not the (in our opinion, overstated) 1.8m mentioned in the planning report). Only the further first-floor front feature bay, set a full 5 metres sideways-distant from the adjacent neighbour, is set a further 0.9m out toward the Road here.

Proposed Massing and Design...

a. We are happy that the planning report references Paragraph 135 of the National Planning Policy Framework (2023)- this emphasises that planning decisions should ensure that developments are

i. 'visually attractive due to good architecture, layout and appropriate landscaping'- we strongly contend that these requirements are met by this proposal, and we welcome the Planning Inspectors own observations on this.

ii. 'sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)'- we strongly feel that this proposal will enhance the built environment hereabouts as it is a considered, holistically designed, sensitively thought through response to this particular site, with particular emphasis placed on its being a good neighbour both in terms of its appearance and heating/energy choices considerably reducing carbon and particulate emissions at this address (due to no burning of fossil fuels).

iii. 'establish or maintain a strong sense of place..' - again, we would contend that our proposal here matches the density of the adjacent terrace here (numbers 3,5 and 7 Alpha Road), and specifically matches the density and proximity of the variety of old and new houses and flats approved and built over 120 years ago and in recent decades in the adjacent Butler Street (15 metres distant). This 'density' is matched to the historic and more recently approved houses and flats in Butler Street, where distances between facing frontages are 12 metres from each other (approve-able due to the recognised historic character of this road).



The existing property at 1 Alpha Road in context

b. Policy D3 of the London Plan and Policy BE1 of the Hillingdon Local Plan both reference the importance of existing and emerging street building types, forms and proportions and materials, to improve the public realm and respect local character. Whilst we recognise that this is a subjective observation, we truly believe that the current proposal can be found to meet all these stated criteria.

c. Specifically taking each quoted point of Policy DMHB 11 of the Hillingdon Local Plan, Part 2 (2020) in turn, we wish to emphasise the following..

i. the scale of development of this proposal broadly matches the m2 footprint of the existing chalet bungalow, and broadly matches the footprint of the 3 x c1960s terraced houses at number 3, 5 and 7 Alpha Road, thus matching plot sizes and widths; building lines have not been queried (eg, whilst lying 0.9m in front of the neighbour at number 3 Alpha Road, the proposed block is set approximately 2m behind the front elevation of the gable wall of the property on the corner of Alpha Road and situated at 32 Pole Hill Road, approximately 7m distant, therefore agreeing); the proposal respects the existing rhythm and gaps between structures (as covered in Mr Chrysanthou's report), and involves considered architectural composition and quality of detailing and improved views both from and to the site (due to the newly landscaped front garden areas x 3, compared to the existing tall brick front garden walls

blocking any views into or from the existing chalet bungalow).

.ii. High quality building materials as specified already match those in the vicinity- we note that the adjacent property is white rendered, and number 17 Butler Road, 10m distant is white painted; also the existing chalet bungalow is white rendered. The proposed blue/grey tiles would match the original roof materials on the corner property here that were only recently replaced with red tiles when extended; also, the visible blue/grey slate roofing on the current terraced cottages at 20, 22, 22a, 24, 26, 28, 8, 10 and 12 Pole Hill Road; the modern block of flats at 34 Pole Hill Road and the further modern block of flats at 32A Pole Hill Road; also at 5, 9 (five modern flats), 11, 13, 24, 20, 10 and 12 Butler Street all boast extant blue/grey slate roofing- we stress this point as Mr Chrysanthou states in his report that ‘..blue slate which is not noted to be a prevail ‘(sic).

.iii. Internal design and layout can be shown to meet all criteria regarding required floor areas and proportions and would be adaptable to different activities (our only proviso regarding our above statement is that a small amendment is proposed to enlarge the footprint of the ground-floor wc of the proposed 3 bedroomed house, ideally to be agreed by a condition, if the Planning Inspector were minded to approve this application)

.iv. and .v. Whilst there are no highlighted designated or undesignated heritage assets to be safeguarded in this vicinity, we feel that the public realm would be enhanced by the new proposed landscaped front gardens and proposed front elevation here.



The proposed scheme, viewed from a similar viewpoint to the preceding photo.

d. Whilst reading the delegated planning officer's report, it appears to us that it is the impact on the street scene, character and appearance (all 'subjective' matters) that are the principal reasons cited by the officer for a refusal here. Taking each of the issues that are highlighted by this planning report in turn, we hope that the Planning Inspector may be able to consider each matter in isolation, in order that, should a further planning application be needed, these points would be easier to agree with the local Planning Department..

e. (page 14, council report, 4th paragraph).. the council report highlights a hipped roof on the west elevation and a gabled roof on the east elevation. In our view, these considered design decisions better reflect and respond to the neighbouring character of dwellings (eg, number 3 Alpha Road has a side gable, so the proposed detail here matches the character of its neighbour. Likewise, at the other end of the proposed terrace, the property at number 32 Pole Hill Road has a hipped roof facing the proposed hipped roof of the three bedroomed property here, and thus matches the character of its neighbour).. It is important for the Planning Inspector to note that Hillingdon Council's policies currently require another three bedroomed property to be

reinstated here, so rather than proposing an obvious terrace of three x 2-bedroomed properties here (which always appeared slightly too tight for this site), there was always going to be an interesting dichotomy between a 3-bedroomed and 2 x 1-bedroomed properties being proposed here, which we have embraced in the current design. We truly feel that this had led to a richer and more characterful front elevation. It is clear that this asymmetrical arrangement can be shown to match the current immediate character of the area, as per the nearby Butler Street/ Alpha Road terrace elevation described below.

We would also suggest that any perceived ‘lopsidedness’ would be difficult to perceive when walking down the street (after passing the different properties at either end of this terrace), and even if it were to be perceived, it would be sensitively and clearly communicating the existence of the slightly wider 3-bedroomed unit here. More importantly, this asymmetrical composition fully embraces the existing character/ front elevational detailing of the three houses that make up another terrace involving the house fronting Alpha Road and the adjoining 30 and 32 Butler Street (approved and built c1980s) situated 20 metres away.



A ‘recent’ approved asymmetrical terrace, corner of Alpha Way and Butler Street

We would also state that there is (in our opinion) no design necessity for all terraces to appear symmetrical, particularly given the non-symmetrical current front elevations to the adjacent corner property at 32 Pole Hill Road, too.

f. (page 14, council report, 5th paragraph).. We have previously stated that the planning officer is mistaken regarding the assertion that blue slate does not prevail in this neighbourhood.

We have also previously clarified that whilst the proposed roof is 1.3m higher than that at 3 Alpha Road (due to its c1960s design and choice of a very shallow pitch roof, as was the fashion then), it is also 0.3m lower than the adjacent roof at the western end of the site, closest to the corner property at 32 Pole Hill Road and also set considerably lower than the (blue slate) ridge roof of the adjacent block of flats at 32A and 34 Pole Hill Road (15 metres distant).

We also feel that the planning officer may be ‘overstating their case’ when writing that,

with apparent reference to the visible facades [quote] .. *'The overall design of the scheme (including the fenestration and materials) is not considered to add any visual interest to the street.'*

We would particularly ask that the Planning Inspector considers the planning officer's above statement alongside their next paragraph (page 14, council report, 6th paragraph).. when the planning officer also contends that.. [quote] .. *'..the design is heavily adapted to address the constraints resulting in an awkward, unbalanced and incongruous form.'*

We would anticipate and point out to the Planning Inspector that, if there were judged to be an effort to address the constraints of the site here, it would also add a degree of 'visual interest to the street'.



An aerial view of the proposed street facade, in context.

As we always strive to carefully tailor each of our designs to best suit the contradicting requirements of our clients, their neighbours and council policies, we are pleased that the planning officer recognises this fact, but we strongly contend that this consideration has resulted in a scheme that (in our opinion) adds considered and characterful visual interest to this street. We hope that the Planning Inspector will refer to the deposited 3d scale modelled street level views when deciding if the current scheme results in a 'considered and logical design solution' or a 'harmful, incongruous form', as the council contends.

g. (page 14, council report, 6th paragraph).. We note that reference is made to the design and orientation of windows (particularly the first floor master bedroom windows), and that the officer appears to accept that no undesirable overlooking of neighbour's property occurs. We are pleased to note this conclusion, as considerable time was spent in the office here on this aspect of the design.

We wish the Planning Inspector to note that if the council had had any issue regarding the fenestration and sizing of these windows, we would have been happy and able to quickly amend this aspect of the design, but as previously mentioned, there was no reply from the delegated officer when we attempted to engage with him, prior to any decision being reached on this application.

We would also point-out that the design and placement and sizing of the front south-facing master bedroom windows (each having 2 x windows set at the two extreme ends of these front-facing rooms, to give a better spread of natural light from mid-morning into the evening) were designed with reference to the 2022 Building Control Approved Document 'O' overheating, 'simplified method' methodology, that proved that windows of this size and orientation and opening size could be shown to reduce summer overheating and thus avoid air-conditioning solutions resulting in ongoing carbon savings here, whilst also providing

sufficient sunlight and daylight to these rooms.

Whilst we still recognise that our above statements are ‘subjective’, we feel that Mr Chrysanthou’s further assertion that [quote].. ‘Based on the stark departure set out above, the proposal fails to comply...’ is worthy of further more detailed consideration, and we welcome the Planning Inspector’s views on this aspect of this appeal.

We trust that the following further four quoted reasons for refusal can be addressed, (if the Planning Inspector is minded to approve the above primary reason for refusal), by suitably worded conditions.

Reason 2.. ‘Accessibility.. The proposed layout fails to demonstrate that it would be designed and constructed as an accessible and adaptable dwelling in accordance with M4(2) technical specifications as set out in Approved Document M to the Building Regulations (2015 edition). As such the proposed development is contrary to Policy D7 of the London Plan (2021). ’

We agree with the Accessibility Officer’s report that the three bedroomed property is required to have a larger downstairs wc fitted with a gully for emergency wet-room use (this was an oversight within the office here, but would have been rapidly amended and found acceptable if the council had chosen to liaise with us when approached by us).

We have added a further annotated drawing in the Appendix (variations of plan drawings 51 and 52) that shows the small required amendment.

We are pleased to confirm that a shallow ramped access is already provided to each principal private entrance.

Whilst our deposited plans showed suitable furniture layouts, the variations of plan drawings 51 and 52 have been checked to show that the deposited floor plan arrangement can already meet the clear access zones and the spacial requirements within bedroom, bathroom and kitchen areas (which is no surprise when these rooms are well-proportioned and meet the Mayor of London’ Technical requirements’ floor area measurements and distances, and the Government’s 2015 Technical housing standards- nationally described space standard’.)

If the Planning Inspector is satisfied that this reason for refusal has been shown to be solve-able and addressable by the current scheme, we would request that a suitable condition be attached to any subsequent approval granted here, such as

‘Prior to any works commencing on-site, further plans shall be deposited and approved by the council that will clearly show 1 x enlarged ground-floor wc partitioning, a shallow ramp and threshold-free access to the principal private entrance, and further basic annotated furniture arrangements to show dimensioned clear access zones .’

Reason 3.. ‘Living conditions.. The proposed layout in terms of the lack of policy compliant floor to ceiling heights, inadequate outlook and amenity and insufficient information relating to daylight and sunlight levels within the proposed units, would result in inadequate living conditions for the future occupiers of this development. As such the proposed development is contrary to Policies DMHB 11 and DMHB 16 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D6 of the London Plan (2021) and Paragraph 135 of the National Planning Policy Framework (2023). ‘

a. For clarity, we are pleased to re-confirm that the proposed siting and position of windows meet current Building Regulations requirements regarding the sizing of windows, the opening sizes of these designed windows, and the provision of exterior automatic solar blind

systems where appropriate.

For these reasons, we are confident that proposed daylight and sunlight levels are more than adequate as designed.

However, if on balance, the Planning Inspector is minded to approve the other aspects of this current application, then if merited, we would be happy for a suitably-worded planning condition to be added to any approval, such as..

‘Before any work is to be commenced on-site, a supporting Daylight and Sunlight assessment of the proposed habitable rooms of these dwellings, showing compliance with national Daylight and Sunlight levels, with regard to ‘the vertical sky component’ and ‘spatial daylight autonomy (sDA)’ is to be deposited with the council’.

b. For clarity, the proposed translucent window ‘blinkers’ to the front of the property are shown constructed of laminated and toughened obscured glass, set with oblique views through the blinkers; thus they would not detrimentally affect proposed daylight and sunlight levels here, and would only be visible from within each bedroom from certain positions BUT whenever in such a position, the position of the second window in the room would give unhindered views. We also wish to remind the Planning Inspector that at the bottom of page 14, the planning report says [quote].. ‘*While on small sites which are commonly constrained an element of this [designing to address the overlooking] is to be expected..*’. We trust that the Planning Inspector after due consideration, can offer a view as to whether this development, in their opinion, qualifies as a ‘small site’, and would thus be found to be an acceptable design characteristic in this particular instance. [eg, for background information, it is noted that the Mayor of London’s ‘Small Sites design code’ of February 2022 defines a small site as ‘less than 0.25 hectares in size = 2500m²; as the current application site is 20m x 20m in area, this would equate to 400m² floor area and would thus qualify as a ‘small site’ under this definition..]

c. We note that the Council have adopted the Mayor of London’s specific requirement to show 2.5m floor-to-ceiling head-heights in all developments. This is contrary to the Government’s own national 2015 Technical Housing Standards, which only references 2.3m floor-to-ceiling head heights, which our current proposal shows.

On closer reading of the Mayor of London’s Policy D6 of the London Plan, it becomes apparent that this document largely assumes that London’s new housing will consist of large floor area blocks of flats, with deep floor plans and limited access to sunlight or ventilation. In those flat-development circumstances, a 2.5m floor to ceiling height would be apt, but we would contend that this requirement is not so apt when the character of the neighbourhood allows for small footprint houses with daylight access front and back, with a variety of neighbouring existing floor-to-ceiling heights, some of which will correspond to the 2.3m height currently proposed here. In terms of carbon emissions, heightening ceilings would require extra ceiling space to be heated during winters, thus producing less carbon savings. In summer, via the Approved Document Part ‘O’ calculations, we’ve already shown that there will be an ability to adequately ventilate and cool these properties during hot spells, so the extra ceiling volume is not merited in this respect either.

Our proposal, in our opinion, currently matches the small cottage character of its adjacent neighbours, and we find it hard, in this situation, to justify a higher ceiling here without questioning its necessity in this particular circumstance (eg, we have recent experience of designing properties with 2.3m head heights, of similar floor plan areas and similar orientation and these dwellings have been airy bright spaces that are cost effective to heat and that do not overheat during hot spells).

However, in the Appendix, we are happy to show an amended section, that shows that the council’s required 2.5m floor-to-ceiling heights can be achieved (albeit introducing an unnecessary area of insulated, sloping ceilings to rooms at the front and back of the property, as

we would wish to retain the current horizontal eaves and gutter heights, to better match the appearance and character of the adjacent terrace beginning at 3 Alpha Road, and matching the fenestration of other nearby cottages and terrace houses, too.

If, on balance, the Planning Inspector is minded to approve other aspects of this appeal proposal, but still feels that a 2.5m floor to ceiling height is more apt than the national technical housing standards requirement of 2.3m, then if merited, we would be happy for a suitably-worded planning condition to be added to any approval, such as..

‘Before any work is to be commenced on-site, scale sections will be deposited and approved by the council, showing clear floor to ceiling head heights of 2.5m across a minimum of 75% of the floor area of each dwelling.’ [for information, the technical housing standards requirement allows for 75% of floor areas to be 2.3m in height; the proposed sloping ceilings would agree with this requirement].

Reason 4.. ‘Air quality.. The applicant has failed to demonstrate that the development is air quality neutral and that the harm and demands created by the proposed development in respect of air quality can be mitigated. As such the proposed development is contrary to Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) and Policy SI1 of the London Plan (2021)’.

The London Plan Guidance regarding ‘Air Quality Neutral’ was published in February 2023. Under point 2.2 ‘Excluded development’ Paragraph 2.2.1 states the following..

‘Developments, including major developments, that do not include additional emissions sources are assumed to be Air Quality Neutral and to meet the Air Quality Neutral benchmarks. As such, there is no need to do an AQN Assessment. This would include, for example, developments that have no additional motor vehicle parking, do not lead to an increase in motor vehicle movements, and do not include new combustion plant such as gas-fired boilers.’

The existing chalet bungalow (proposed removed) is heated by a gas-fired central heating boiler and retains a chimney stack serving the lounge. 100M2 of existing front hardstanding provides parking for 4 cars, but there are no electric vehicle (ev) charging points here, so such cars would either be petrol or diesel-powered.

The current replacement proposals here are for 4 x parking spaces, each with their own electric vehicle (ev) charging point (thus directly enabling the adoption of electric car usage and a proportionate reduction in airborne particulates, improving air quality here). The existing gas supply would be obsolete and removed.

The existing chimney stack would not be reinstated in this proposed development. The existing gas fired heating system would be replaced by a photo-voltaic panel system, tied to an air source heat pump (both systems are annotated on the deposited planning drawings)- these systems have already been adopted to provide appropriate reductions in emissions here and to contribute towards meeting EU limit values and national air quality objectives for pollutants (it is noted that the Hillingdon Air Quality Management Area specifically refers to the reduction of nitrogen dioxide NO₂, which is produced when petrol or gas or wood fuels are burnt).

For the above reasons, this development would appear to meet the criteria to qualify as an ‘excluded development’ and we welcome the Planning Inspector’s consideration of this assertion.

If, on balance, the Planning Inspector is minded to approve other aspects of this appeal proposal, but still feels that a planning condition is merited regarding this issue, then we would be happy for a suitably-worded planning condition to be added to any approval, such as..

‘Before occupation of the new development, the as-approved pv panels, air source heat

pumps and electric car charging points are all to be installed, tested and operational, to the satisfaction of the Building Inspector.’

Reason 5.. ‘Biodiversity Net Gain.. In the absence of satisfactory biodiversity net gain information, it has not been demonstrated that the proposal would deliver at least a 10% increase in biodiversity value relative to the OREPDEL predevelopment biodiversity value of the onsite habitat. As the proposed development fails to provide an appropriate biodiversity net gain, it is contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), Policy G6 of the London Plan (2021), Policy EM7 of the Hillingdon Local Plan Part 1 - Strategic Policies (2012) and Policy DMEI 7 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020).

We note that this requirement became mandatory during the progress of this project, and we are happy to provide supporting information in the attached Appendix, showing that this proposed development would deliver at least a 10% increase in biodiversity value, (principally due to the removal of existing rear patios/ paths and the introduction of three areas of greenery/ front gardens to replace the current 100m2 of car hardstanding alongside the road).

However, we also note, under the Government’s published ‘Biodiversity net gain’ guidance (published 14th February 2024) [quote]..

‘This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. The biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development.’

Based on the above guidance, we would request that, if the Planning Inspector is minded to approve other aspects of this appeal proposal, then we would be happy for a suitably-worded planning condition to be added to any approval, such as..

‘A Biodiversity Gain Plan is to be submitted and approved by the planning authority before commencement of the development, showing at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. ’

Conclusion.

For all the above reasons, we feel that our current design is, on balance, a sensible proposition for this site, and we welcome the inspector’s own view regarding the above.

In conclusion, we feel that careful assessment of the existing street-scene, and careful assessment of previous approved applications on this street and the current application’s favourable or neutral impact on the environment here, should support our current proposals and we welcome the inspector’s investigation of this site and its locality.

We hope that our objective diagrams and descriptions (particularly our supporting photos and three- dimensional scale models and views) are helpful to the inspector. We do not believe that our proposal would create a (subjectively) unacceptable development, as the council contend.

We hope that you can take all the above points and comments into consideration when reviewing this appeal and we look forward to receiving your considered response.

Yours faithfully,

Michael Oakes

cc client

POSTSCRIPT.

Whilst we recognise that local authority planning departments are extremely busy, we are yet to receive any requested contact from the delegated planning officer.

We also wish to clearly state that a considerable amount of time and effort has been spent studying the previous agent's/ designer's various proposals and the council's stated reasons for refusals in those instances- also, the client had previously paid for pre-application meetings with planning officers too. In our (subjective) opinion, we have listened to, and addressed the council's previous planning concerns here, eg, designing-out overlooking/ privacy concerns and addressing parking requirements whilst introducing attractive greener front gardens that enhance the public realm here.

We also attach a printout in the appendix (published on the BBC News website, January 30th, 2025), that **shows that Hillingdon Council planning department is required to allow 2,292 new homes a year to be built, to meet current government targets, but that over the last three years, Hillingdon's average is 795 new homes built.** The figures also show that whilst the national average is that 72% of all new planning applications for new housing are approved, **we note that in Hillingdon only 59% of planning applications for housing were granted in the 12 months up to September 2024.**

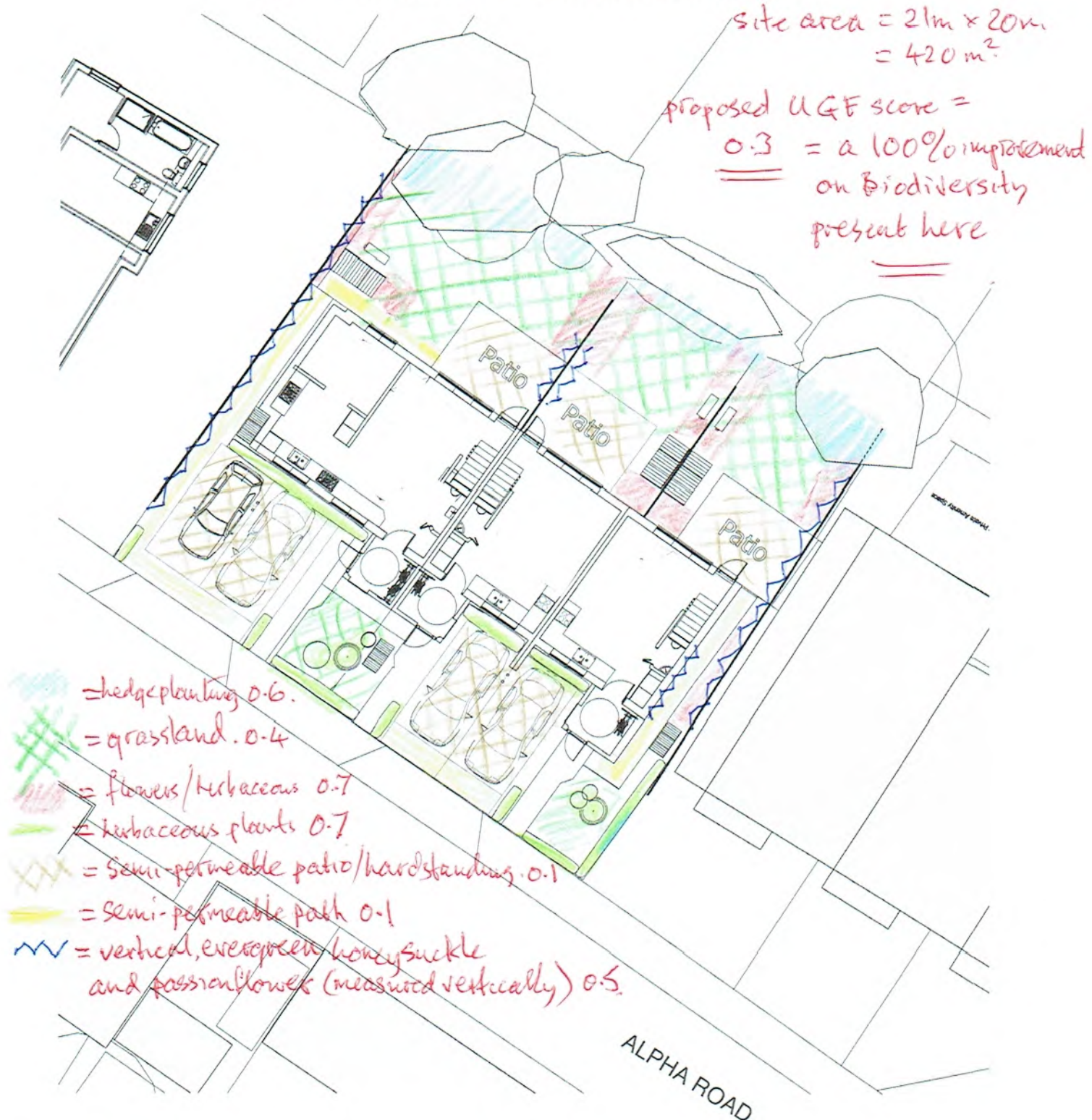
Appended sheets follow, regarding UGF score (meets biodiversity net gain requirement; section ceiling height if varied); furniture dimensions plan layout annotated

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1:200 @ A3



0 5 10 20m

Drawing Title

Greenery Block Plan
Proposed

- see separate calculation
sheet

Project no. / Stage / Drawing no. / Revision

0432- PLA-

65_A

Revision notes:

Drawn by: xx

A - First Issue

(showing current proposal meets
Biodiversity Net Gain requirement)

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1:200 @ A3



0 5 10 20m

Drawing Title

Greenery Block Plan - see separate calculation sheet
Existing

Project no. / Stage / Drawing no. / Revision

0432- PLA-

66_A

Revision notes:

Drawn by: XX

A - First Issue

(comparative helping to show the current proposal meets Biodiversity Net Gain requirement)

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1 Alpha Road - Urban Greening Factor Comparisons. (existing score + proposed score.)

$$\text{Amenity grassland (rear garden)} \quad 90\text{m}^2 \times 0.4 \text{ factor} = 36$$

$$\text{Mixed hedge planting} \quad 40\text{m}^2 \times 0.6 \text{ factor} = 24$$

$$\text{Flower bed. (front boundary)} \quad 4\text{m}^2 \times 0.7 \text{ factor} = 2.8$$

$$\therefore \text{existing UGF score} = \frac{62.8}{420\text{m}^2} = \underline{\underline{0.15}}$$

Proposed development Urban Greening Scoring

$$\text{Amenity grassland} \quad 75\text{m}^2 \times 0.4 \text{ factor} = 30$$

$$\text{Mixed hedge planting (extg)} \quad 40\text{m}^2 \times 0.6 \text{ factor} = 24$$

$$\text{Flower/herbaceous (rear)} \quad 33\text{m}^2 \times 0.7 \text{ factor} = 23.1$$

$$\text{Herbaceous (front garden)} \quad 19\text{m}^2 \times 0.7 \text{ factor} = 13.3$$

$$\text{Semi-permeable} \quad 79\text{m}^2 \times 0.1 \text{ factor} = 7.9$$

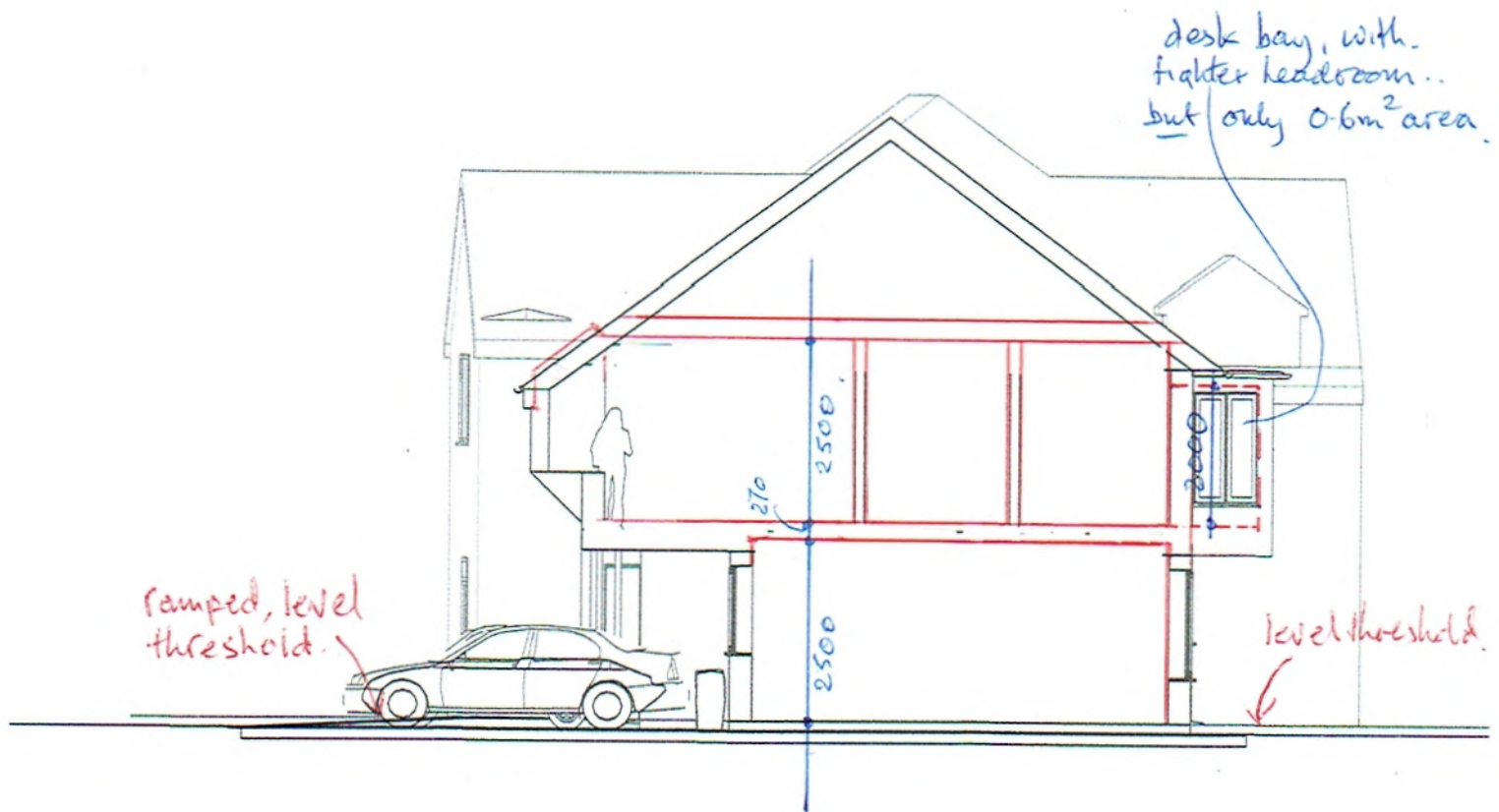
$$\text{Semi-permeable path} \quad 28\text{m}^2 \times 0.1 \text{ factor} = 2.8$$

$$\therefore \text{proposed UGF score} = \frac{101.1}{420\text{m}^2} = \underline{\underline{0.24}}$$

Note! the above calculation does not include for 'green facades' rooted in soils, eg, evergreen climbing honeysuckle and passion flower onto garden walls + new house flanks could increase this score by $50\text{m}^2 \times 0.5 \text{ factor} = 25 = \frac{126.1}{420\text{m}^2} = 0.3$ possible UGF.

$\therefore$ these figures show an Urban Greening Factor improvement of between 62% and 100% above the existing, thus showing that a Biodiversity Net Gain of 10% is comfortably achieved here.

Proposals at 1 Alpha Road, Uxbridge,
showing the existing external volume + fenestration
Kept, and floor-to-ceiling heights raised, only if appropriate /
required.



January 2025 = scale section, showing, if merited,
that 2.5m high floor-to-ceiling heights can be met here,
albeit with a raised collar 1st-floor ceiling.

(but we hope that the Planning Inspector will consider
approving the current 'Nationally described space'
standard of 2.3m still)

Drawing Title

As Proposed
Sections

Project no./ Stage/

Drawing no./ Revision

0432- PLA- Reason 3,
sketch

Revision notes:

Drawn by: MM

A - First Issue

0 5m 10m
1:100 @ A4 size.

New homes in Hillingdon

2,292

new homes a year are required by government targets

795

homes were added per year on average in Hillingdon since 2021, which is less than the new target

222

new homes received their first Energy Performance Certificate (EPC) in the six months from July 2024

60

more than the same six months the year before

Planning permission in Hillingdon

59%

of planning applications for housing decided by Hillingdon Council were granted in the year ending September 2024

Compared with:

72%

of applications across England overall

As published
by BBC News,
January 30th 2025.
(re new houses.)

The UK government's target for 1.5 million homes is for England only. It does not apply in Scotland, Wales or Northern Ireland, where housing is a devolved matter.

Sources

Targets are taken from the government's consultation with councils.

Figures on average new homes cover new builds, conversions and demolitions. The next release of official housing data covering the year to March 2025 is scheduled for the autumn. In the meantime, energy performance certificates are a good early indicator of the number of new homes, but they are not the only measure used by the government. They do differ in time periods and in sources and EPCs also do not account for demolitions.

Individual planning applications can be for single homes or large developments. This data is for the year to September 2024.

Latest update: 30 January 2024

The Labour government's targets for English councils, requiring **370,000 homes a year**, were finalised in December. It expects to see the number of new homes rising "significantly" in about 2026-27, once reforms have taken effect.

The data analysed by the BBC comes from energy performance certificates (EPCs), a leading indicator of new homes.

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KEY

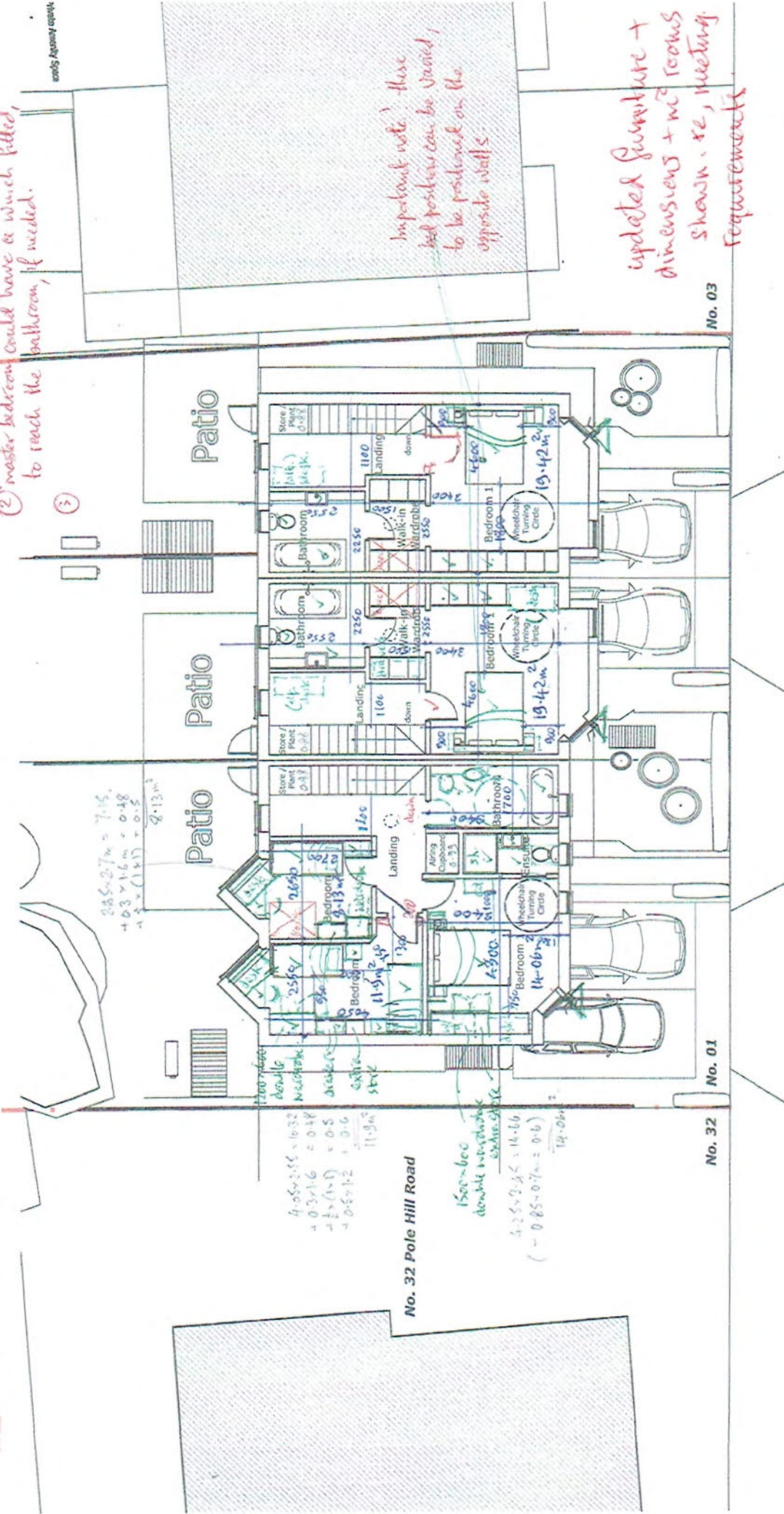


Diagrammatic position for lifetime home lift position possible, knockout panel

Notes

① all required furniture shown: considerable extra wardrobe/dressers space provided above standard requirement.

② master bedroom could have a window fitted, to reach the bathroom if needed.



Project no / Stage / Drawing no / Revision: 0432-PLA- 51-C

Revision notes: A - First Issue, B - Changes Client Requested 14/07/2024, C - Notes added 12.25 for appeal.

As Proposed Floor Plans

1:100 @ A3

Client: Michael Oakes (Agent)

Date: June 2024

Address: 1 Alpha Rd, Uxbridge UB10 0QP

10 Parkfield Avenue, Hillingdon, Middlesex, UB10 0DF, Great Britain

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KEY

Diagrammatic position for
lifetime home lift position
possible, knockout panel

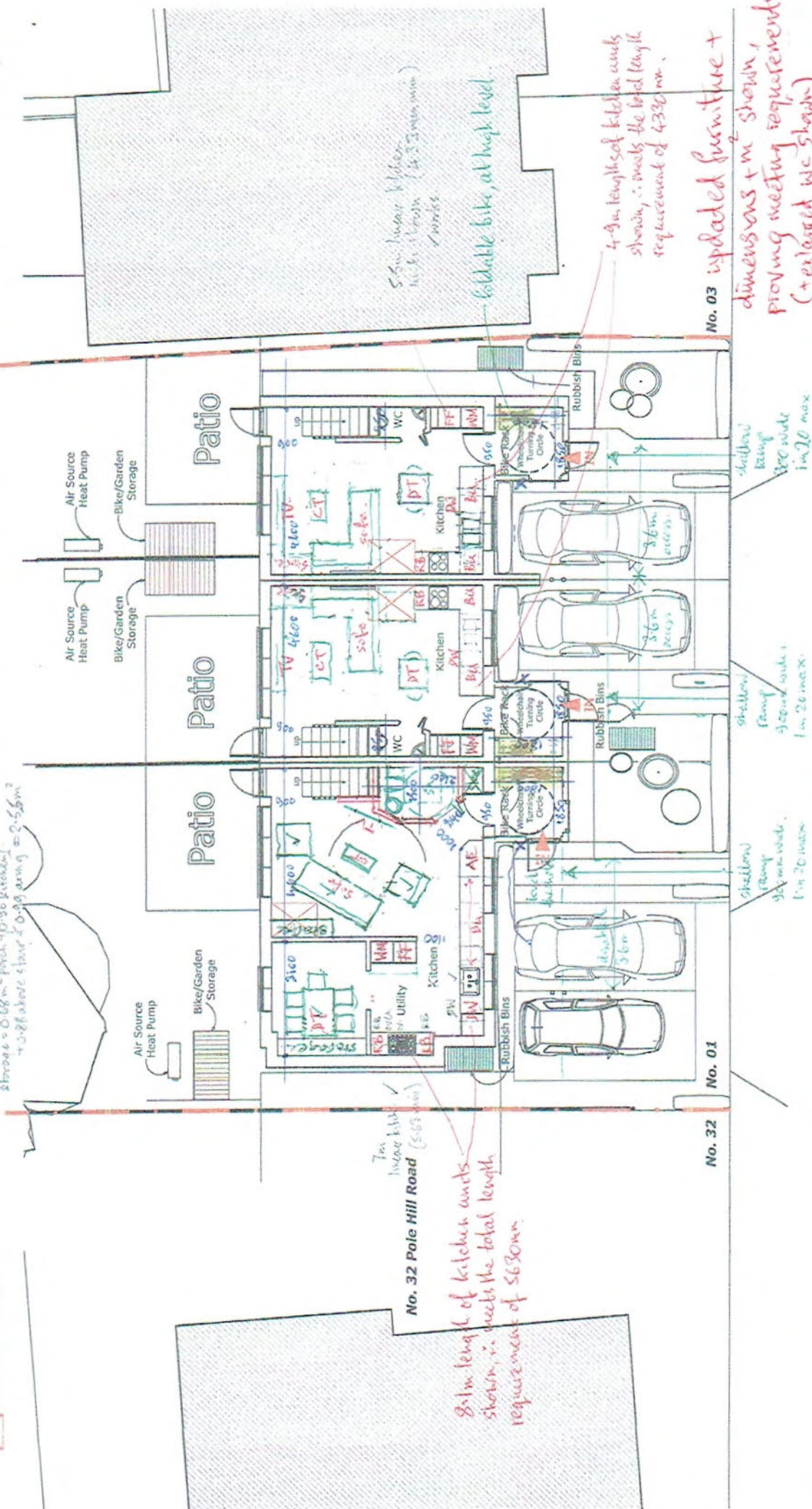


2 bed 5 person.
storage = 0.68m² porch + 0.96 kitchen
+ 0.81 above 4 floor + 0.99 garage = 2.55m²

1 bed 2 person

1 bed 2 person

2nd 1st = 0.68 (porch) + 0.88 (store) = 1.56m² (extra wardrobe storage)



Project no. / Stage / Drawing no. / Revision

0432-PLA- 52.C

Revision notes:

A - First Issue

B - Changes Client Requested 16/07/2024

C - notes added 1.2.25 for appeal

As Proposed

Floor Plans

Drawing Title

1:100 @ A3



Date

June 2024

Client

Michael Oakes (Agent)

Address

1 Alpha Rd, Uxbridge UB10 0QP

10 Parkfield Avenue, Hillingdon, Middlesex, UB10 0DF, Great Britain



Notes in red added, for appeal document

March 2025