

Appellants Statement of Case

82-84 High Street, Ruislip, HA4 7AB

April 2026



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Appellant

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Date of issue

29th April 2026

1 Introduction and Background to this Appeal

- 1.1 Gillings Planning have been instructed by our the Appellant to prepare this Appeal Statement in respect of the proposed creation of 6no. self-contained flats within the existing building with associated cycle and bin storage, following the change of use of first floor from office (Class E) to residential (Class C3), the erection of a two storey rear extension with balconies and terraces and alterations to the rear of the building including an additional storey and terraces. Retention and reconfiguration of the Class E unit at ground floor level with alterations to fenestration, at 82-84 High Street Ruislip (the 'Appeal Proposal').

Background to the Appeal

- 1.2 A planning application seeking full planning permission was submitted to London Borough of Hillingdon (the 'LPA, the 'Council') on the 17th February 2026 and was validated on the 19th February 2026 (LPA ref. 78935/APP/2026/418). The description of development is as follows:

"Creation of 6no. self-contained flats with associated cycle and bin storage, following the change of use of first floor from office (Class E) to residential (Class C3), the erection of a two-storey rear extension with balconies and terraces and alterations to rear building including an additional storey and terraces. Retention and reconfiguration of the Class E unit at ground floor level with alterations to fenestration."

- 1.3 The description of the Appeal Site and its surroundings is set out in the Planning and the Design and Access Statement that accompanied the application, and for reasons of brevity it is not repeated here.
- 1.4 During the course of the application we requested a meeting with officers, but this request was declined.
- 1.5 We did speak with the case officer's Team Leader via telephone, and it became clear that the LPA considered that no amendments could be made to the Appeal Proposals (either during the course of the application or in a subsequent planning application) that would make the Appeal Proposal acceptable to the LPA. Thus, an impasse was reached and reluctantly, this Planning Appeal has become necessary.
- 1.6 The application was refused by Officers under delegated powers on 16th April 2026. The decision notice was issued on the same date and lists just two reasons for refusal:

1) The proposed development, by reason of its cumulative scale, bulk and visual complexity, including extensive alterations to the roof of the locally listed building and the addition of a further storey to the rear building, would result in an overdevelopment of the site. The Appeal Proposal would materially alter the established proportions and roofscape, erode the legibility of the building's neo-Georgian design, and diminish the prominence of key features, resulting in a dominant and intrusive form of development that fails to preserve the character and appearance of the Ruislip Village Conservation Area and harms the significance of the locally listed building. This represents a clear departure from the form of development previously found acceptable at appeal. The identified less than substantial harm is not outweighed by the limited public benefits of the Appeal Proposal and is therefore contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One (2012), Policies DMHB 1, DMHB 4 and DMHB 11 of the Hillingdon Local Plan: Part Two (2020), Policies D3 and HC1 of the London Plan (2021), and the National Planning Policy Framework (2024).

2) The proposed development, by reason of the additional storey to the rear building and associated increase in height and bulk, would result in an overbearing form of development that would cause an unacceptable loss of outlook and sense of enclosure to neighbouring occupiers, in particular the first floor rear bedroom window at No. 80A High Street and No.2 Ickenham Rd. The Appeal Proposal would therefore result in harm to the residential amenity of adjoining occupiers, contrary to Policy DMHB 11 of the Hillingdon Local Plan: Part Two (2020), Policy D3 of the London Plan (2021), and the National Planning Policy Framework (2024).

Procedural Considerations

- 1.7 Given the minor scale of development and the unmet need for more homes, we consider this appeal should be dealt with by way of the Written Representations procedure. This being the quickest and most straightforward method of appeal.
- 1.8 The Appellant acknowledges that the appeal procedure for written representations changed on the 1st of April 2026. However, as per the publication put out by the Planning Inspectorate on 1st April 2026, this only applies to applications made from 1st April 2026.
- 1.9 As this application was submitted in February 2026, the appeal follows the previous procedure guidance for a written representations appeal under the Planning Inspectorate's Procedural Guide for Planning Appeals in England relating to applications dated on or before 31 March 2026 (updated 18 February 2026).

This Appeal Statement

- 1.10 In the interests of brevity, this Appeal Statement does not seek to duplicate the information submitted in support of the Appeal Application. Accordingly, this Statement must be read alongside the information contained in the planning application forms, plans, documents, technical reports, and in particular within the Planning, Design and Access Statement, and Heritage Assessment which together provide a comprehensive description of the proposed development, the design evolution and design strategies, and include a range of supporting technical information.
- 1.11 The remainder of this statement is structured as follows:
 - Section 2:** sets out the reasons for refusal and sets out our approach to assessing the validity of these reasons;
 - Section 3:** sets out the planning history relevant to this appeal;
 - Sections 4 to 9:** sets out the Appellants view that the reasons for refusal are not valid and not justified;
 - Section 10:** confirms that the Appeal Proposal complies with the relevant local and national planning policies;
 - Section 11:** confirms the planning merits of the Appeal Proposal that have been overlooked and that the tilted balance is engaged; and
 - Section 12:** provides a summary and conclusion and explains why this important development proposal should be allowed.

2 Reasons for Refusal

2.1 Breaking down the reasons for refusal cited on the Decision Notice and repeated at Section 1 of this Statement, the assertions and allegations made by the LPA in the decision notice are that:

A. The Appeal Proposal would result in an overdevelopment of the site through its cumulative scale, bulk and visual complexity, including:

- Extensive alterations to the roof of the locally listed building
- the addition of a further storey to the rear building;

B. The Appeal Proposal would materially alter the established proportions and roofscape, erode the legibility of the buildings neo-Georgian design, and diminish the prominence of key features;

C. The Appeal Proposal would result in a dominant and intrusive form of development that fails to preserve the character and appearance of the Ruislip Village Conservation Area and harms the significance of the locally listed building;

D. The Appeal Proposal is a clear departure from the form of development previously found acceptable at appeal;

E. The identified less than substantial harm is not outweighed by public benefits;

F. The additional storey proposed to the rear of the building and associated increase in height and bulk, would result in an overbearing form of development that would cause an unacceptable loss of outlook and sense of enclosure to neighbouring occupiers, in particular the first floor rear bedroom windows:

- At No. 80A High Street and;
- No.2 Ickenham Rd; and

G. The Appeal Proposal would be contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One (2012), Policies DMHB 1, DMHB 4 and DMHB 11 of the Hillingdon Local Plan: Part Two (2020), Policies D3 and HC1 of the London Plan (2021), and the National Planning Policy Framework (2024).

Other Issues/Planning Balance

2.2 The Appellant also considers it necessary to consider the contribution the proposed development will make towards the Council's Housing Land Supply. It is important to note that at the time of submitting the application, the Council's latest available position stated that the Council could demonstrate in excess of a five-year supply of deliverable housing sites, and as such the tilted balance was not engaged. However, in the weeks before the LPA issued its decision refusing the application, it had published an updated position statement on its Housing Land Supply (on the 1st April according to the Officer's report), confirming that it is now only able to demonstrate a 2.5 year supply of deliverable housing sites – which is significantly below the requirements for a five-year housing supply in Paragraph 78 of the National Planning Policy Framework (2024).

2.3 In this case, the Appellant considers that the LPA has not appropriately or correctly applied the tilted balance in this instance and has overlooked the substantial benefits of the proposed development. The Appellant therefore urges the Inspector to consider this matter as part of their assessment of this appeal.

3 Planning History

- 3.1 The relevant planning history associated with the Appeal Site is contained within Section 2 of the Planning Statement which was submitted in support of the planning application. In the interests of brevity, this is not repeated in this statement, but it is referred to where necessary. We encourage the Inspector to review Section 2 of the submitted Planning Statement for this particular background context.
- 3.2 For clarity however, where this statement refers to the extant scheme, this refers to planning application ref. 78935/APP/2025/2287, under which the LPA granted permission for the creation of 5 flats.

4 Overdevelopment

Point A – the Appeal Proposal would result in an overdevelopment of the site through its cumulative scale, bulk and visual complexity, including:

- Extensive alterations to the roof of the locally listed building***
- the addition of a further storey to the rear building***

- 4.1 In response to Point A, the Appellant considers that the Appeal Proposal is of a scale and bulk that is entirely appropriate and sympathetic to the host building. The extensions proposed are modest and are achieved via simple yet cohesive interventions to the existing building. They do not result in an overdevelopment of the site, as asserted by the LPA.
- 4.2 The overall scale and bulk of the Appeal Proposal is readily comparable to that which the LPA granted permission for at the Appeal Aite under the extant permission ref. 78935/APP/2025/2287. The physical differences between the extant scheme and the Appeal Proposal are small in scale and comprise:
- A hipped to mansard alteration to the roof of the main building (82-84 High Street – The locally listed building/non-designated heritage asset); and
 - The addition of a mansard roof, to the rear flat roofed building.
- 4.3 Regarding the alteration to the roof of the main building, from the very outset the Appellant sought to achieve a design that resulted in as small a physical change as possible to the external appearance of the building and its roofscape, whilst maximising the efficient use of the Appeal Site to deliver one further residential unit (when compared to the extant scheme). This is because the Appellant has a deep understanding of the appeal site and its locality (as demonstrated in the application submission), and respects that the front elevation of the building with its prominent corner plot within the High Street, is the most sensitive part of the building.

4.4 The Appeal Proposal seeks only a very modest alteration to the existing roof, infilling two small areas between the existing chimney stacks (prominent features that are retained), taking the roof from a hipped construction to a mansard. This modest alteration, is best depicted in the following excerpts of the existing and proposed elevations, with the red line within the proposed elevation denoting the existing roof form:

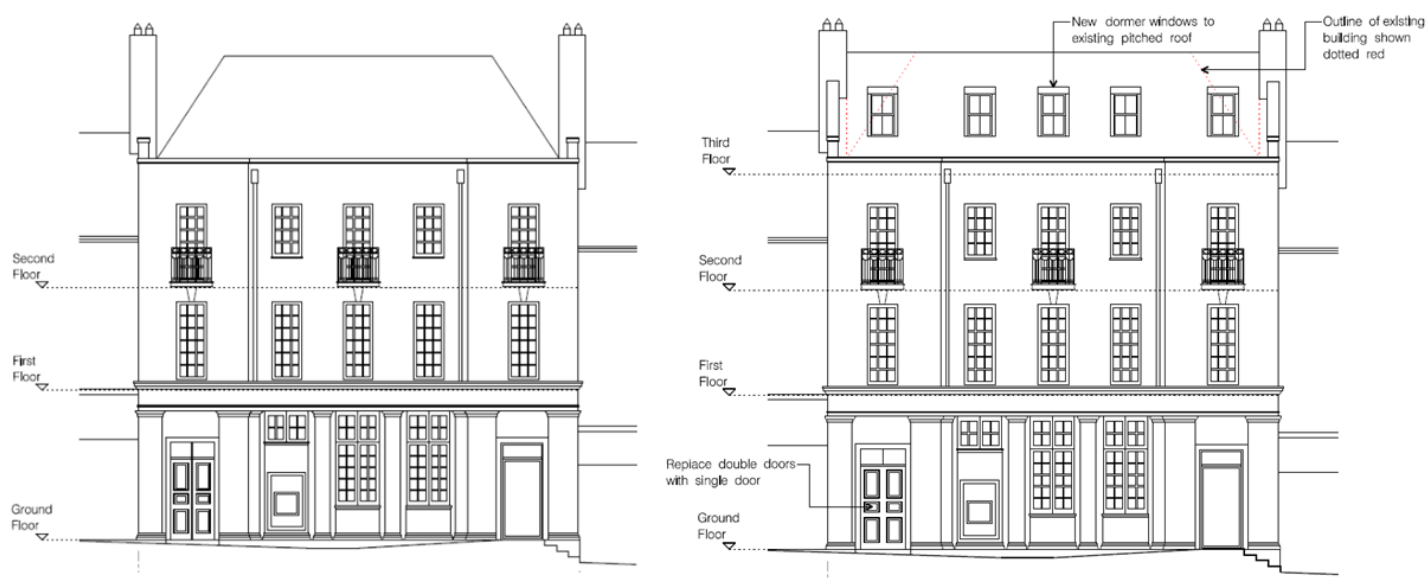


Figure 1: Existing & Proposed Front Elevations

4.5 Beyond the small intervention made to the roof form itself, five small and traditionally designed dormer windows would be introduced, wholly in line and respectful of the fenestration upon the floors below.

4.6 The roof is also extended to the rear of the building, the extent, form and appearance of which cannot be seen from within the streetscape. Notwithstanding this, it is extended to the rear via traditional architectural design which maintains the buildings neo-Georgian character (discussed in detail below in this statement) and incorporates a mansard with two small dormer windows and a set of French doors that open upon a private balcony. The extent to which the roof is extended to the rear, matches the extent of the permitted two storey rear extension to the building under the extant scheme.

4.7 In relation to the rear building, the Appeal Proposal sought the addition of a mansard roof to the existing flat roof building. This is primarily to deliver a better mix of units within the site when compared to the extant scheme, thus making more efficient use of the Appeal Site (discussed in detail below in this statement), but the Appellant also believes that the proposed design will also result in a more cohesive, sympathetic and enhanced visual aesthetic at the rear of the appeal site. The excerpts below, comparing the existing and proposed west elevation, best represent the modest increase in scale proposed:

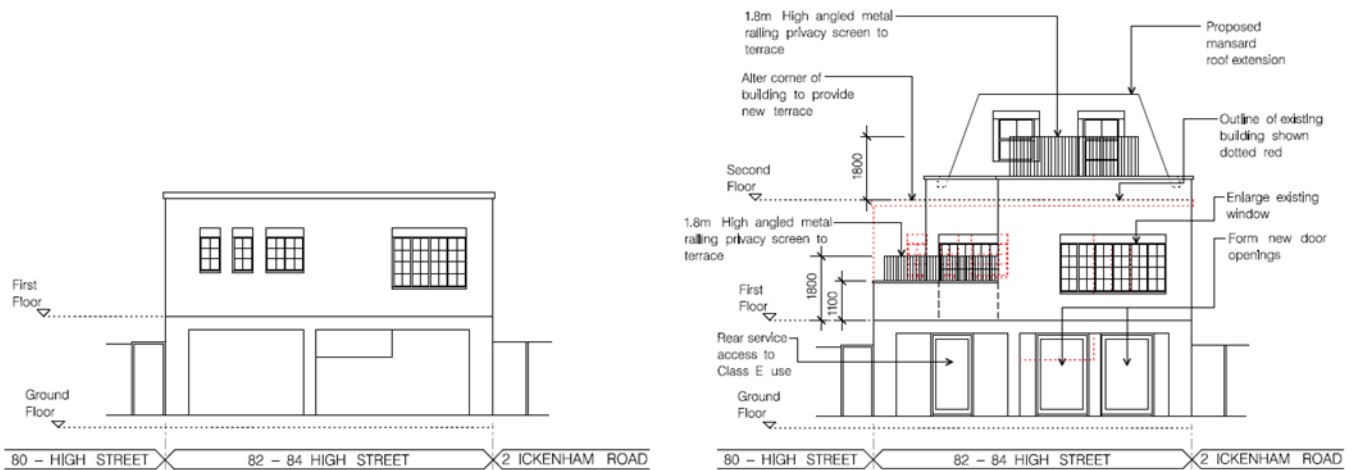


Figure 2: Existing & Proposed Rear (west) Elevation

4.8 It is also important to draw comparison here, between the alterations permitted to the rear building under the extant scheme and extensions and alterations proposed as part of the Appeal Proposal. This is demonstrated in the excerpts below of the west elevation:

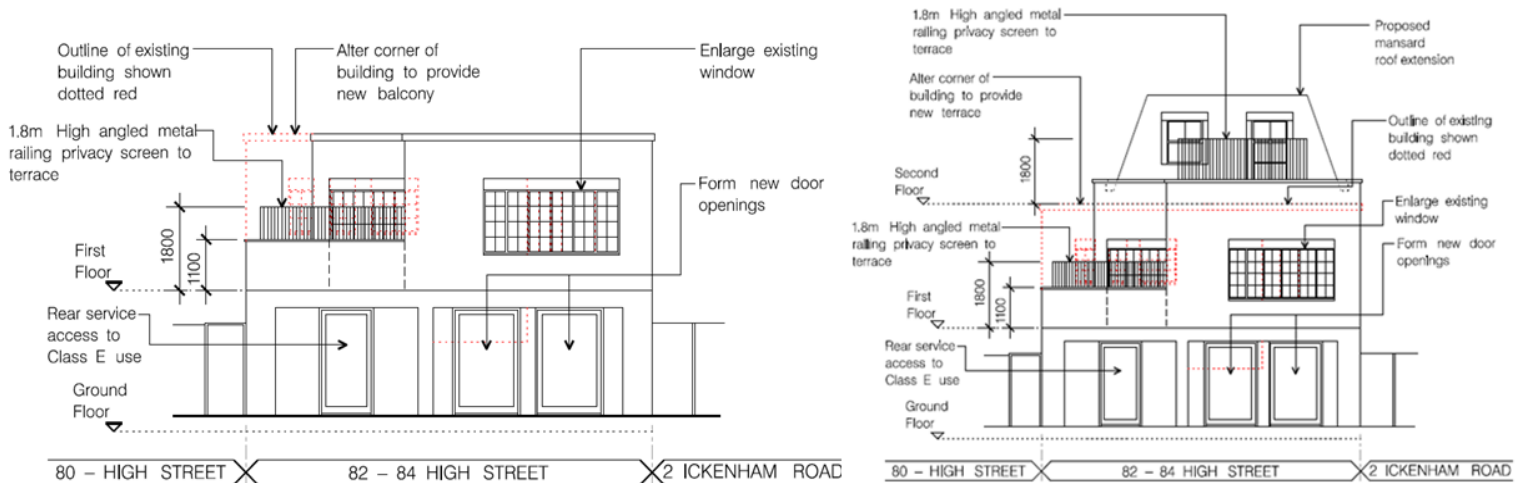


Figure 3: Extant scheme rear (west) elevation (right) & Appeal Proposal rear (west) elevation

4.9 This clearly demonstrates that the Appeal Proposal, seeks only to introduce a mansard roof coupled with traditionally styled dormer windows, beyond the extent that has already been permitted on the site. It is entirely appropriate and proportionate to the existing building and its surroundings in terms of its overall scale and bulk.

4.10 In summary, the Appellant considers that the Appeal Proposal certainly does not result in an overdevelopment of the site. The Appeal Proposal is wholly appropriate in terms of its overall scale and bulk, both in relation to the existing building and its surroundings. The design proposed is cohesive in terms of its visual appearance and echo's the neo-Georgian characteristics of the host building. This is best appreciated within the two CGI's below, as presented within the submitted Planning Statement:



Figure 4: CGI of proposed front & rear elevation

5 Legibility of the buildings neo-Georgian design

Point B - The Appeal Proposal would materially alter the established proportions and roofscape, erode the legibility of the buildings neo-Georgian design, and diminish the prominence of key features

5.1 The Appellant does not dispute that the existing building in its current form, makes a positive contribution to the significance of the Conservation Area. The fact that the building is on a prominent street corner, and that it provides notable aesthetic interest through its neo-Georgian composition, is also not in dispute. For these reasons the building is recognised as a non-designated heritage asset. However, the buildings position within the Conservation Area and its recognition as a non-designated heritage asset, should not automatically mean that the principal elevation of the building is not allowed to adapt and change – particularly when the changes proposed are so sympathetic. During the course of the application, it became clear that the LPA's view in this regard, is that any change to the front elevation of the existing building would be perceived as harmful. The Appellant offered to discuss potential design amendments with Officers, but this was rejected.

5.2 The Appeal Proposals will of course materially alter the existing roofscape and the buildings proportions as it is currently perceived. This is unavoidable when extending any part of a building. That is the very nature of an extension. The test however is whether or not the alterations and extensions harmonise with the local context accounting for scale, height, mass, rooflines, streetscape rhythm and architectural composition – as set out in detail under policy DMHB 11 of the Hillingdon Local Plan Part 2.

5.3 In this case, whilst materially altering the buildings roofscape, it is done so in an entirely sympathetic manner. The preservation of the existing buildings significance as a non-designated heritage asset and its positive contribution to the Ruislip Village Conservation Area has underpinned the design of the Appeal Proposals from the outset. As discussed above, the Appeal Proposal introduces a mansard roof to the host building, departing from its current hipped form. As seen in the comparison of the existing and proposed elevational drawings above, this is a small change, and the altered roof continues to sit between the two prominent chimney stacks at either end. Five small and traditionally styled dormer windows are introduced, in harmony with the buildings existing fenestration. The alteration is considered to be proportionate, and one that respects the buildings established proportions and the surrounding roofscape. As seen in the images below, the Appeal Proposals harmonise with the roofs of other buildings on the High Street and within the immediate vicinity of the appeal site which similarly present mansard roofs with traditional dormer windows:



Figure 5: Examples of mansard roofs & traditional dormer windows in the High Street. Source: Google Streetview

5.4 In terms of the roof form more generally, mansard roofs are a common characteristic within the local context and within the Appeal Site's immediate locality, such as the examples above, but also demonstrated in the examples below – albeit on more modern buildings:



Figure 6: Examples of Mansard roofs within the Appeal Sites vicinity. Source: Google Streetview

5.5 With regard to the legibility of the building's neo-Georgian design, and its key features, this was something that heavily influenced the design of the Appeal Proposals. To inform the scheme, the design team reviewed the Council's list of locally listed heritage assets where the appeal site is listed at entry 184, in order to understand what the Council understood to be the buildings key and prominent features. The Council's statement of significance/reasons for designation is as follows:

"1920s three storey brick building on the corner with Ickenham Road. A prominent classically inspired composition. The bank is 5 windows wide, the 3 central bays are slightly recessed and framed with prominent down pipes with decorative hoppers. There are two similarly detailed asymmetrical wings on either side. The bank has robust vertical decorative brick detailing, Juliet balconies and a prominent stone fascia/band between the ground and first floors." (Bold underline is our emphasis added).

5.6 The entry also notes the building as a key landmark which contributes to local character and the street scene.

5.7 In contrast to the views of the Council's Conservation Officer, the Appeal Proposal unquestionably maintains and conserves entirely, the architectural features listed in the local list entry, such as the prominent down pipes and decorative hoppers, detailed asymmetrical wings, robust vertical brick detailing, Juliet balconies and the prominent stone fascia/band. The buildings classical neo-Georgian façade which addresses the wider townscape will remain untouched. The Appeal Proposal does, however, propose alterations to the existing roof-form, which notably is not referenced within the local list entry/statement of significance. Whilst a description of the existing roof does not exist within the Council's statement of significance, it is acknowledged that this does not mean that it does not contribute towards its overall architectural character.

5.8 As discussed above, the Appeal Proposal is underpinned by the applicant's desire to conserve the buildings pared-back Georgian classical architectural style, and it is maintained that this is translated in the Appeal Proposals. The alteration from a hipped to an equally traditional mansard roof with dormer windows that are sat behind the buildings existing parapet and sit in direct alignment with the fenestration on the façade below, all sat comfortably between the existing chimney stacks, ensures that the buildings legibility as an example of neo-Georgian classical design is retained.

5.9 Whilst this presents a clear change in roof form, what is proposed is very typical of that expected within classical neo-Georgian architecture, a style of architecture that is typically associated with mansard roofs and quaint traditionally styled dormer windows and particularly on buildings that sit within a row of terraced buildings, such as the application site. There are numerous other examples of neo-Georgian architectural style, which represent a direct comparison to what is being proposed, within the site's immediate vicinity, such as No.74 High Street (pictured above).

5.10 It is therefore strongly argued that the Appeal Proposals as they are presented, whilst presenting a subtle change to the host building that will be appreciable from the street scene, is not a change that erodes the building's architectural integrity, nor does it disrupt its proportions as asserted by the LPA. In contrast, the Appeal Proposals wholeheartedly retain the buildings architectural interest and integrity as a local example of neo-Georgian architecture and is done so by introducing the typical features that one comes to expect from this style of architecture. Arguably, the Appeal Proposals could be said to enhance the buildings neo-Georgian style. Lastly, by altering the building's roof form in a modest and traditional manner, it can be said to enhance its appreciation as a landmark building on the corner of High Street and certainly does not undermine its status as such.

6 Effect on the Locally Listed Building and the Conservation Area

Point C - The Appeal Proposal would result in a dominant and intrusive form of development that fails to preserve the character and appearance of the Ruislip Village Conservation Area and harms the significance of the locally listed building.

- 6.1 As discussed earlier in this statement, it is considered that the Appeal Proposal is of an appropriate and proportionate scale, bulk and mass, and of a design that is in keeping with the host building and its surroundings. It is not dominant nor is it intrusive. In the interests of brevity, these arguments are not repeated here.
- 6.2 At a national level, the NPPF confirms how the effect of an application on the significance of a non-designated heritage asset should be taken into account. Paragraph 216 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” (Bold underling is our emphasis added).
- 6.3 The Appellant disputes that a balanced judgement has been made in this case by the LPA, rather quite the opposite.
- 6.4 It is important to note that, unlike paragraph 215 of the NPPF which relates to considering the impact of proposals on designated heritage assets, paragraph 216 does not require harm to non-designated heritage assets to be weighed against the public benefits of a proposal.
- 6.5 Underneath the national planning policy context sits the London Plan, which is also a material consideration. Policy D1 relates to London’s form, character and capacity for growth. Relevant to these proposals, is the supporting text to this policy contained within paragraph 3.1.7 which states that “As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change.” (Bold underling is our emphasis added).
- 6.6 Policy HC1 relates to Heritage conservation and growth in London. Relevant to these proposals, is the supporting text to this policy contained within paragraph 7.1.6 which states that “Historically, London has demonstrated an ability to regenerate itself, which has added to the city’s distinctiveness and diversity of inter-connected places. Today urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement, repair and beneficial re-use of heritage assets.” (Bold underling is our emphasis added).
- 6.7 At a local level, the Hillingdon Local Plan Part 2 includes policy DMHB 3 (Locally Listed Buildings), and confirms that “proposals will be permitted where they retain the significance, appearance, character or setting of a locally listed building.” (Bold underling is our emphasis added).
- 6.8 The Appeal Proposals as submitted within this planning application, are the direct result of very careful consideration and demonstrate a clear understanding of the significance, appearance, character and setting of the locally listed building.
- 6.9 The Appellant strongly disputes that the Appeal Proposal results in less than substantial harm at the higher end of the scale, to the non-designated heritage asset. As discussed in detail in this statement above, the Appeal Proposal is of an appropriate and proportionate scale and form to the host

building. It also wholeheartedly respects the neo-Georgian architectural composition, and in places, enhances it. Furthermore, by altering the form of the roof in the manner proposed, its status as a prominent corner building within the High Street is reinforced and certainly not undermined – as perhaps it is currently by the more recent addition of the Thomas Moore building and 74 High Street within the streetscape.

- 6.10 Given that the Appeal Proposal demonstrates an appropriate way in which an existing building is able to accommodate change, whilst demonstrating a clear understanding of the existing building's character and setting, in accordance with policy D1 of the Local Plan and policy DMHB 3 of the Hillingdon Local Plan Part 2, the LPA's approach here is not understood, in attempting to preserve the existing building in a static way. The Appeal Proposal represents an entirely appropriate balance that is struck between the existing fabric and the proposed changes. The LPA's position is completely contrary to the aspirations of policy D1 of the London Plan.
- 6.11 As per policy HC1 of the London Plan, these proposals represent an opportunity for the creative re-use of a non-designated heritage asset, via an example of urban renewal, achieved in a traditional and respectful manner.
- 6.12 The Appeal Proposal does not adversely affect the significance of the locally listed building.
- 6.13 As noted throughout, the appeal site is situated within the Ruislip Village Conservation Area, a designated heritage asset. Planning policy across all levels confirms that the character and appearance of conservation areas must be conserved and/or enhanced by development proposals. The significance of the conservation area is articulated through its special character and appearance. This is summarised in the Ruislip Village Conservation Area Appraisal, which was adopted in July 2010. (at that time 82-84 High Street were Not locally listed). 82-84 High Street lies within Character Area 2, The High Street, within the Appraisal and describes the character of the immediate environment in detail. This is relayed in the Heritage Impact Assessment submitted with the application. Of note, the appraisal identifies 82-84 High Street as a *"prominent classically inspired composition."* In relation to the rears of shops in the area, the appraisal identifies that these areas include *"ad hoc storage structures and informal parking/servicing arrangements. The rear elevations often have large unattractive flues, vents, services and other additions, such as aerials, satellite dishes, air conditioning units and escape stairs."*
- 6.14 It is not disputed that No.82-84 High Street is clearly a handsome building with attractive architectural detailing of some quality in its own right as well as part of the overall character of the Conservation Area, to which it clearly makes a positive contribution. As recognised in the Conservation Area Appraisal, this quality relates primarily to the front elevation rather than at the rear.
- 6.15 In the interest of brevity, this section will not repeat our assessment of the Appeal Proposals design as per the section(s) above. It is considered that the same is relevant in terms of the Appeal Proposals impact upon the character of the conservation area. In our view, it is clear that the Appeal Proposals to the front of the building are clearly sympathetic to the host building and the surrounding Conservation Area. The special character and appearance of the Conservation Area is preserved entirely through the design of the Appeal Proposals; and arguably enhanced by the attractive dormer windows that give a slightly greater prominence to this landmark building; helping it to reassert its place in the street hierarchy – as currently undermined by the taller development at the Thomas More Building to the west and 74 High Street to the north east.

6.16 To the rear, the majority of what is proposed has already been granted permission by the LPA under the extant permission. This revised scheme, simply caps the already approved flat roof rear extension with a sympathetic mansard style roof (enabling the scheme to deliver a more diverse mix of residential units – discussed further below). The style of the proposed roof is distinctly similar and reflective of other mansard roofs in the immediate vicinity, such as the adjacent Thomas Moore Building. Its introduction is also considered to tie in the built form at the rear of the building, with the main building, creating a consistent neo-Georgian architectural style throughout the site, rather than the ad-hoc approach to design currently presented at the rear of High Street. It is asserted that through this design intervention, the rear of the building as proposed, enhances this part of the conservation area by demonstrating a better understanding of the conservation areas special character and appearance – at the same time as making the most efficient use of a brownfield site (discussed further below). This is best demonstrated within the CGI's below, as presented within the appellants original rebuttal to the LPA's Conservation Officer's formal comments on the application:



Figure 7: CGI's of proposed rear elevation

6.17 The LPA considers the Appeal Proposals to result in less than substantial harm (moderate to low level) on the Conservation Area. Whilst this is a low level of harm that has been identified, this is strongly disputed by the appellant. For the reasons outlined above, the proposed scheme complies with paragraph 214 of the NPPF – it certainly does not lead to 'substantial harm to or total loss of significance of a designated heritage asset'. We believe that it also complies with Paragraph 215 for the reasons given above. Changes to the host building preserve its physical character and contribution to the High Street and enhance its contribution to the rear – where the conservation area is currently much degraded. These proposals offer an opportunity to much improve the nature and visual quality of this space – and its relationship with other buildings to the rear of the parade. The Appeal Proposals are considered in this case, to preserve the character and appearance of the Conservation Area and thus complies with S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

6.18 The Appellant considers that the Appeal Proposal results in no harm to the Ruislip Village Conservation Area.

7 A Departure from the Extant Permission

Point D - The Appeal Proposal is a clear departure from the form of development previously found acceptable at appeal.

- 7.1 The Appellant questions why this statement is made within the reason(s) for refusal.
- 7.2 It is not disputed that the Appeal Proposal is different from that permitted under the extant permission. It is not disputed that the extant permission is a material consideration. However, each planning application should be considered on its own merits, and the mere fact that a development with a different design and form has been accepted previously, should not automatically mean that a new proposal is not acceptable.
- 7.3 The Appellant notes the form of development permitted previously, but it is considered that the Appeal Proposal is equal in terms of its acceptability.
- 7.4 Following the granting of planning permission for the extant scheme, the Appellant reviewed the plans and identified a manner in which an additional residential unit could be accommodated within the site, as well as increasing the size of one of the proposed units, resulting in a better overall housing mix. As a result, an even more efficient use of a brownfield site within a town centre location is proposed, all whilst preserving and enhancing the significance of the locally listed building and the character and appearance of the surrounding Conservation Area.
- 7.5 A departure from the form of development permitted under the extant scheme should not equal a reason for refusal on that basis. This scheme should be considered on its own merits, and it is concerning if this basic principle of planning practice has not been adopted by the LPA in this instance.

8 Less than Substantial Harm is not Outweighed by Public Benefits

Point E - The identified less than substantial harm is not outweighed by public benefits

- 8.1 The LPA have identified less than substantial harm at the higher end of the scale in respect of the Appeal Proposals effect on the non-designated heritage asset/locally listed building, and at the moderate to low end of the scale in respect of the Appeal Proposals effect on the Conservation Area (the designated heritage asset in this case).
- 8.2 As noted earlier in this statement, it is important to note that, unlike paragraph 215 of the NPPF which relates to considering the impact of proposals on designated heritage assets, paragraph 216 does not require harm to non-designated heritage assets to be weighed against the public benefits of a proposal.
- 8.3 Therefore, the public benefits of the scheme must only be weighed against the less than substantial harm that the LPA have identified upon the Ruislip Village Conservation Area. The LPA's Conservation Officer identified less than substantial harm at the moderate to low end of the scale on the Conservation Area. Whilst the Appellant disputes this, and argues that there is no harm on the Conservation Area as discussed in detail above in this statement, it is considered that the public benefits of the Appeal Proposal certainly outweigh the less than substantial harm asserted by the LPA's Conservation Officer if the Inspector is minded to agree with their assessment in that regard.
- 8.4 The public benefit in this case is primarily the Appeal Proposal's contribution of much needed housing, within a sustainable urban and town centre location, within an existing building and

brownfield site. Within the current context, where the Council has a very poor housing land supply at 2.5 years against a five-year requirement, the contribution of 6 residential units demonstrates a sizeable public benefit, and that alone is considered to outweigh the low level of harm that has been identified. Notwithstanding this, the Appeal Proposal represents a number of other public benefits, which when combined with the benefit of providing much needed new housing, substantially outweighs the identified harm and these are:

- Provision of much needed housing, including:
 - 4 one-bedroom (1-person) units
 - 1 two-bedroom (4-person) duplex unit
 - 1 two-bedroom (3-person) unit
- Long-term preservation of a non-designated heritage asset as a result of the substantial investment that the Appellants wish to make in the property
- Other social and economic benefits including:
 - During construction, the scheme will see investment in construction, along with the generation of direct jobs over the duration of the construction period, along with the inevitable creation of in-direct employment opportunities for potentially, existing residents within Hillingdon.
 - The Appeal Proposal will see an increase in the number of economically active residents moving into the area, to the benefit of local businesses. In addition it is likely that new residents will spend a proportion of their income within the local area such as through household retail expenditure, leisure goods and services.
 - New residents moving into the area will bring an economic benefit to the Council such as through additional Council Tax payments.
- Sustainability and Environmental Benefits:
 - The proposed development will provide highly energy efficient homes, designed in accordance with the latest building regulation standards.
 - The site is within a very sustainable location, with a PTAL 4 rating, the site is walkable and cyclable and in close proximity to all modes of public transport including bus stops and a nearby tube station. This reduces the need for any future residents to be reliant upon a private vehicle.

8.5 In summary, it is clear the public benefits that arise from the Appeal Proposal substantially outweigh the low level of less than substantial harm identified by the LPA in accordance with the Framework.

9 Impact on Neighbouring Amenity

Point F - The additional storey proposed to the rear of the building and associated increase in height and bulk, would result in an overbearing form of development that would cause an unacceptable loss of outlook and sense of enclosure to neighbouring occupiers, in particular the first floor rear bedroom windows:

- At No. 80A High Street and;***
- No.2 Ickenham Rd.***

9.1 The Officer's assessment within their report does not correlate entirely with the reason for refusal in this regard. Whilst the assessment identifies potential concerns, section 7.1 of the report ultimately concludes the following:

"Taking all matters into account, including the amendments made in response to the appeal decision, the BRE-compliant daylight and sunlight results, and the mitigation measures proposed, the development would not result in unacceptable harm to the living conditions of surrounding occupiers. The Appeal Proposal is therefore considered to comply with Policy DMHB 11 of the Hillingdon Local Plan: Part Two (2020), Policy D6 of the London Plan (2021) and Paragraph 135 of the NPPF (2024)."

9.2 Notwithstanding this, we address this reason for refusal in our assessment below.

9.3 Firstly, in considering the potential for neighbouring properties to become enclosed by new development, the levels of daylight and sunlight received by such properties is an important factor in any such assessment.

9.4 It is therefore important to highlight that it is acknowledged within the Officers report that a Daylight and Sunlight Assessment was submitted in support of the Appeal Proposals. It considered the impact on neighbouring properties including Nos. 2 Ickenham Road, 8 Ickenham Road and 78-80 High Street, assessing a total of 17 windows. The assessment was undertaken in accordance with BRE guidance (Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022)) and focuses on the most sensitive windows serving habitable rooms. The results demonstrate that all assessed windows meet the BRE criteria, with all retaining in excess of 80% of their existing Vertical Sky Component values and maintaining appropriate levels of Annual Probable Sunlight Hours. As such, the Appeal Proposal would not result in a material loss of daylight or sunlight to neighbouring occupiers.

9.5 Secondly, it is also important to note that the proposed development at the rear of the building maintains the separation distances as per that of the extant scheme. The Appeal Proposal therefore does not introduce new development that is in closer proximity to neighbouring amenities than what has already been assessed, deemed acceptable and approved by the LPA.

9.6 The Officers report asserts that through the addition of a mansard roof to the rear building, an adverse impact is demonstrated upon the first-floor rear bedroom window of 80A High Street, by way of creating a sense of enclosure and a loss of outlook. This is disputed. Whilst the occupants of 80A High Street will of course be able to see the proposed mansard roof, the window in question and in fact all the windows at the rear of 80A High Street look directly past the rear building. This is best demonstrated within the CGI below, with 80A being to the left-hand side of the appeal site:



Figure 8: Aerial CGI of Appeal Proposal from the rear

9.7 Based on the fact that the windows at the rear of 80A High Street look directly past the appeal site and combined with the fact that the Appeal Proposal does not introduce new development any closer to this property beyond that permitted under the extant scheme, it is considered therefore that the Appeal Proposal does not result in an unacceptable loss of outlook to 80A High Street, and certainly does not create a sense of enclosure to this property.

9.8 Turning to 2 Ickenham Road, the Officers report asserts that the Appeal Proposal introduces new concerns in relation to the amenity of this property when compared to the extant scheme. Firstly, the Appeal Proposal does not introduce any development that is in closer proximity to 2 Ickenham Road than that of the extant scheme. The addition of a mansard roof to the rear building does however increase the height of the development at the rear, and this will be visible from the rear windows of 2 Ickenham Road, though it is disputed that this is to an extent that results in an unacceptable loss of outlook and a sense of enclosure, as accused by the LPA.

9.9 It is noted that the LPA's primary concern relates to the first-floor rear bedroom window of 2 Ickenham Road. However, at the first-floor level at the rear of this property is a conservatory with extensive amounts of glazing across the entirety of its rear elevation. As acknowledged in the Officers report, the relationship at the rear of 2 Ickenham Road is already constrained, and it is disputed that the proposed development will substantially worsen this relationship and certainly not to an extent that can be considered harmful.

9.10 The outlook from the first floor of this property, in our view, will remain largely unchanged – due to the placement of the glazing on the conservatory and the intervening boundary treatments that already exist, the outlook will continue to be towards the existing side elevation of the rear building; no different to that already permitted by the LPA under the extant scheme. The ability of the

occupants in this property to appreciate upward views through their first-floor conservatory also contributes to an acceptable outlook and mitigates any perceived sense of enclosure.

9.11 Furthermore, 2 Ickenham Road's primary outdoor amenity space would appear to be to the south, as visible on the latest available satellite imagery and demonstrated by various garden paraphernalia, plants and a pergola – all of which is sufficiently far removed from the proposed development at the appeal site and provides a surprising amount of private outdoor amenity space for what is a dense urban location in London.

9.12 In relation to the outlook from the second-floor windows of 2 Ickenham Road, whilst the outlook from these windows will undoubtedly change, it is not considered that this results in an unacceptable loss of outlook. The key change from the extant scheme when compared to the Appeal Proposal, is that these windows will look out towards a mansard roof rather than a flat roof. Two windows will be visible from the second floor of 2 Ickenham Road, but one window is an obscure glazed window serving a bathroom and the second serves a stairwell; and the distance between these windows and 2 Ickenham Road is no different to that already permitted by the LPA under the extant scheme. Further, the second floor windows at 2 Ickenham road will overlook a new high quality landscaped/green roof terrace (the quality of which can be conditioned) at the appeal site, and beyond this views will still be achievable beyond the rear building – arguably, the outlook from these windows are improved when compared to the existing situation on the ground, which is none other than an array of flat roofs, metal staircases and cluster of unattractive service entrances.

9.13 The assessment made above in relation to 2 Ickenham Road, are best appreciated in the CGI below:



Figure 9: Aerial CGI of the rear of the Appeal Proposal and the rear of 2 Ickenham Road

9.14 In summary and as set out above, it is considered that the proposed development will not result in an unacceptable loss of outlook from any neighbouring properties nor will it create a harmful sense of enclosure, and in particular 80A High Street and 2 Ickenham Road. The Appeal Proposals maintain what is a very acceptable outlook and relationship with neighbouring properties for what is a very dense and urban town centre location in London, where typically the relationships between buildings that accommodate a range of uses are often already constrained.

10 Accordance with Planning Policies

10.1 This section considers the legislative framework, national and local planning policies relevant to the determination of the Appeal Proposal and for reasons of brevity, focusses on the key policies.

Planning and Compulsory Purchase Act 2004

10.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.

Planning (Listed Buildings and Conservation Areas) Act 1990

10.3 In determining applications for planning permission affecting the Conservation Areas, the Planning (Listed Buildings and Conservation Areas) Act 1990 confirms that development proposals must preserve the character and appearance of Conservation Areas.

Accordance with Local Planning Policies

10.4 The Appellant notes that the development plan (and which contain the key policies relevant to the Appeal Proposal) for the Appeal Site currently comprises the following:

- The Hillingdon Local Plan: Part 1- Strategic Policies (November 2012)
- The Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)
- The Hillingdon Local Plan: Part 2 – Site Allocations and Designations (January 2020)
- The London Plan (2021)

10.5 The LPA cites policies BE1 and HE1 of the Hillingdon Local Plan Part 1 (2012), DMHB 1, DMHB 4, DMHB 11 of the Hillingdon Local Plan Part 2 Development Management Policies (2020), and D3 and HC1 of the London Plan (2021). The National Planning Policy Framework (2024) is also cited, though the specific chapters and paragraphs are not mentioned.

10.6 The remainder of this section considers the Appeal Proposals compliance with each of the planning policies cited in the decision notice.

10.7 Policy BE1 of the Hillingdon Local Plan Part 1 (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. For the reasons set out earlier in this statement, in our view it is clear that the Appeal Proposal certainly maintains the quality of the built environment and in places improves it, through sympathetic, cohesive and high-quality extensions and alterations. Through the creation of new residential units within an urban town centre location, the Appeal Proposal contributes towards creating a sustainable neighbourhood.

10.8 Policy HE1 of the Hillingdon Local Plan Part 1 (2012) confirms that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape. It goes on to confirm that this relates to both designated heritage assets and locally listed buildings, and that the Council will actively encourage the regeneration of heritage assets including their reuse and modification. In our view, and as discussed earlier in this statement in detail, the Appeal Proposal conserves the locally listed building and the conservation area and in places enhances them both. It regenerates, reuses and modifies an otherwise underutilised locally listed building.

- 10.9 Policy DMHB 1 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) confirms that the Council will expect development proposals to avoid harm to the historic environment. In this case, in our view it is clear that the Appeal Proposal sustains the significance of the locally listed building and the Conservation Area. Any low level of harm asserted by the LPA is certainly outweighed by the substantial public benefits associated with the Appeal Proposal.
- 10.10 Policy DMHB 4 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) confirms that new development including extensions to existing buildings must preserve or enhance the character or appearance of the area as well as sustaining its significance and distinctiveness. In this case, the proposal does not result in harm to the Conservation Area; it preserves its character and appearance in its entirety and in places enhances it. Its significance and distinctiveness are sustained.
- 10.11 Policy DMHB 11 confirms that all new development must be designed to the highest standards including harmonising with the local context, using high quality building materials, protects features of positive value within and adjacent to the site and must not adversely impact on the amenity of adjacent properties. For the reasons discussed earlier in this statement, the Appeal Proposal is designed to the highest standards, respects the local context, utilises high quality building materials, protects the value of surrounding features in the locality and respects the amenities of adjacent properties.
- 10.12 Policy D3 of the London Plan (2021) states that all new development must optimise site capacity through the design-led approach, thus making the best use of land. It goes on to confirm that higher density development should be promoted in locations that are well connected. In our view, the Appeal Proposal is a clear representation of optimising a sites capacity through a design-led approach. Through sympathetic and cohesive extensions and alterations the proposal creates 6 homes within an existing building – the Appellant has worked hard and invested heavily to ensure the best use of this site is achieved. The Appeal Site is rated at PTAL 4 – it is well connected.
- 10.13 Policy HC1 of the London Plan (2021) confirms that development proposals must conserve the significance of heritage assets and their surroundings. As noted above in response to policies HE1, DMHB 1 and DMHB 4, the Appeal Proposal does this in its entirety.

Accordance with the National Planning Policy Framework

- 10.14 The decision notice asserts that the Appeal Proposal is Contrary to the National Planning Policy Framework (2024).
- 10.15 The NPPF was originally published in March 2012, and most recently updated in December 2024. It is material consideration in planning decisions. The following chapters and paragraphs are considered to be of relevance to the Appeal Proposal (these are discussed in detail within the Planning Statement submitted with the original application at section 4 and is not repeated in the same detail here for brevity).
- 10.16 The purpose of planning is to contribute to the achievement of sustainable development and Paragraph 8 outlines the three overarching objectives of this:
- Economic;
 - Social; and
 - Environmental

10.17 **Paragraph 9** advises that planning policies and decisions should play an active role in guiding development towards sustainable solutions, also taking local circumstances into account to reflect the character, needs and opportunities of each area.

Response: The Appeal Proposal is a sustainable development, reflects the character and meets the housing needs of the local area.

10.18 **Paragraph 10** sets a presumption in favour of sustainable development to ensure that sustainable development is pursued in a positive way.

Response: This is discussed in detail in the following section, however, a presumption in favour of sustainable development exists in this case. The Appeal Proposal is a sustainable development and should be pursued in a positive way.

10.19 **Chapter 4** (Decision Making) advises that local planning authorities should approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers should seek to approve applications for sustainable development where possible.

Response: The LPA has not approached its decision on the Appeal Proposal in a positive, creative or proactive manner. The LPA has failed to approve an application for a development that will improve the economic, social and environmental conditions of the local area. It has not sought to approve this sustainable development.

10.20 **Chapter 5** (delivering a sufficient supply of homes) relates to the delivery of a sufficient supply of homes and emphasises the Government's objective to significantly boost the supply of housing. Paragraph 61 advises that it is important that a sufficient amount and variety of land can come forward in order to meet demand, aiming to meet an area's identified housing need and mix appropriate to the area.

Response: The Appeal Proposal positively contributes towards the Council's supply of housing, at a time where it cannot demonstrate a sufficient supply.

10.21 **Chapter 8** promotes healthy and safe communities.

Response: The Appeal Proposal wholeheartedly meets the aspirations of Chapter 8.

10.22 **Chapter 9** promotes sustainable transport.

Response: The Appeal Proposal is in a Town Centre Location, rated as PTAL 4. It therefore promotes the use of sustainable transport.

10.23 **Chapter 11** promotes the effective use of land in meeting the need for homes.

Response: The Appeal Proposal wholeheartedly meets the aspirations of chapter 11.

10.24 **Chapter 12** seeks to achieve well-designed and beautiful places.

10.25 **Response:** The Appeal Proposal wholeheartedly meets the aspirations of chapter 12.

10.26 **Chapter 14** seeks to secure a transition to a low carbon future ensuring that climate change adaptation, flood risk and coastal change is considered in in new development.

Response: The Appeal Proposal is designed to and will meet the latest building regulation standards.

10.27 **Chapter 16** seeks to conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed by existing and future generations.

10.28 **Response:** The Appeal Proposal wholeheartedly meets the aspirations of chapter 16.

11 Planning Merits of the Appeal Proposal Overlooked by the LPA, and the Planning Balance

Planning Merits of the Appeal Proposal

11.1 The Government have set an ambitious target of building 1.5 million homes within this Parliament. At the heart of the NPPF is chapter 11 “Making Effective Use of Land”, where it emphasises the urgent need to make more effective use of brownfield land to deliver additional homes. Paragraph 125 states that planning policies and decisions should “give **substantial weight to the value of using suitable brownfield land within settlements for homes**”... “unless substantial harm would be caused.” It goes on to state that decisions should “**promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing** where land supply is constrained and available sites could be used more effectively (**for example converting space above shops, and building on or above service yards**).” (Bold underline is our emphasis added).

11.2 In the previous appeal decision at the site, under appeal ref. APP/R5510/W/24/3356952, and at a time the Council’s position was such that it could demonstrate a five-year housing land supply, the value of using suitable brownfield land within settlements for new homes was explicitly acknowledged in the Inspectors decision. In the Inspectors’ decision at paragraph 35 the Inspector stated “the proposal would add to the housing stock and it would represent the efficient use of an existing building in an urban location. The benefits in these regards attract significant weight.”

11.3 Given the Councils housing land supply is now only 2.5 years, the weight attracted by the provision of housing on this site can only reasonably attract substantial weight.

11.4 Given the site comprises previously developed land which will be utilised to deliver housing, as per paragraph 125c of the NPPF, permission should only be refused if the proposed development is considered to cause substantial harm. As set out in the earlier sections of this statement above, it is our view that the Appeal Proposals clearly do not cause substantial harm; and the LPA’s own assessment only identifies ‘less than substantial harm’ on the heritage asset.

11.5 Furthermore paragraph 125 of the NPPF even emphasis that decisions should “support opportunities to **use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene.**” (Bold underline is our emphasis added).

11.6 The London Plan, under Policy GG2 (Making the best use of land), confirms that those involved in planning and development “must” ... **“enable the development of brownfield land, particularly ... within and on the edge of town centres”** as well as utilising small sites”. It goes on to state that sites that are well-connected by existing public transport must be prioritised – the appeal site has a PTAL rating of 4 reflective of its sustainable location within a town centre. (Bold underline is our emphasis added).

11.7 Policy GG2 goes on to state that those involved in planning and development “must” ... **“proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.”** The revised proposals submitted demonstrate the most effective and efficient use of the site, maximising its density in an appropriate and sympathetic manner in a well-connected location. (Bold underline is our emphasis added).

11.8 Lastly, policy H1 (Increasing housing supply) of the London Plan, confirms that in order to ensure that ten-year housing targets in London are achieved, boroughs should... **“optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions” ... “especially”... “sites with existing or planned public transport access levels (PTALs) 3-6.”** In this case, the appeal site is a suitable brownfield site with existing public transport access levels of PTAL 4. (Bold underline is our emphasis added).

11.9 All of the above is reinforced by the aspirations of the draft NPPF and the direction of travel being set. This is particularly where in this instance:

- The site is situated within an existing settlement boundary where the adverse effects would not substantially outweigh the substantial benefits associated with the scheme and should therefore be permitted.
- The Appeal Proposals make much better use of what is a currently vacant and under-utilised building, and includes converting the space above a commercial premises; and
- Creates additional homes within a settlement by using the airspace above an existing commercial premises through a sensitive redevelopment, including the addition of mansard roofs.

The Planning Balance

11.10 The Council cannot currently demonstrate a five-year supply of deliverable housing sites in accordance with paragraph 78 of the Framework. Therefore, in our view there is a serious and significant shortfall in supply within Hillingdon and the Council should therefore be taking positive action to address this.

11.11 It is the Appellant’s view that the Council has not applied the tilted balance appropriately or correctly.

11.12 The Officer’s report briefly covers the planning balance. It is agreed that in accordance with Footnote 8 of the NPPF, the policies which are most important for determining the application are therefore considered out-of-date. Consequently, Paragraph 11(d) of the Framework is engaged, and the ‘tilted balance’ applies.

11.13 The Officer's report concludes that in the planning balance, the application of Footnote 7 policies within the Framework provides a strong reason for refusing the proposed development – it notes that this in respect of having identified harm to:

- 1) The significance of the locally listed building;
- 2) The character and appearance of the Conservation Area; and
- 3) Neighbouring residential amenity.

11.14 Two of the LPA's points above are strongly disputed. Footnote 7 is clear in that it relates to 'designated heritage assets. Footnote 7 does not relate to non-designated heritage assets such as the appeal site, nor does it relate in any way to a developments effect on neighbouring residential amenity. The LPA has incorrectly applied the tilted balance in this regard. Therefore, only point two listed above can be considered in this regard.

11.15 It is strongly disputed that the development's effect on the character and appearance of the Conservation Area (as a designated heritage asset), provides a strong reason for refusal in this case. As discussed above in this statement, paragraph 125c of the NPPF confirms that permission for new housing on brownfield sites within existing settlements should only be refused if the proposed development is considered to cause substantial harm. The LPA's own assessment in this regard is clear that it considers only less than substantial harm to be demonstrated on the Conservation Area. The threshold of 'substantial harm' as per paragraph 125c is therefore not met. Conversely, paragraph 125 confirms that decisions should give **substantial weight** (bold underline is our emphasis added) to the value of using sites such as the appeal site for the creation of new homes.

11.16 It is therefore considered that in this case, the titled balance is not disapplied.

11.17 Paragraph 11 d) ii of the NPPF, goes on to confirm that planning permission must be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole and having particular regard to key policies for directing development to sustainable locations, making effective use of land.

11.18 The Officer's report in this regard identifies significant adverse impacts upon the character and appearance of the host building and thus the significance of the non-designated heritage asset, the character and appearance of the surrounding area and on neighbouring amenities. As discussed in detail earlier in this statement, this is all strongly disputed and in the interests of brevity the arguments as such are not repeated in this section. It is not considered that these impacts demonstrably outweigh the benefits of the proposed development, which are summarised as follows, along with an appropriate weight assigned to each:

- The appropriate use of a brownfield site, within an existing settlement for the provision of housing – **Substantial Weight**
- The provision of six much needed new homes, making a positive contribution towards the Councils poor housing land supply – **Substantial Weight**
- The site is within a very sustainable location, with a PTAL 4 rating, the site is walkable and cyclable and in close proximity to all modes of public transport including bus stops and a nearby tube station. This reduces the need for any future residents to be reliant upon a private vehicle – **Significant Weight**
- Long-term preservation of a non-designated heritage asset as a result of the substantial investment that the Appellants wish to make in the property – **Significant Weight**

- The Appeal Proposal will see an increase in the number of economically active residents moving into the area, to the benefit of local businesses. In addition it is likely that new residents will spend a proportion of their income within the local area such as through household retail expenditure, leisure goods and services – *Moderate Weight*
- Generation of direct jobs over the duration of the construction period, along with the inevitable creation of in-direct employment opportunities for potentially, existing residents within Hillingdon, including bringing back into use a commercial class E unit in a town centre location – *Moderate Weight*
- The proposed development will provide highly energy efficient homes, designed in accordance with the latest building regulation standards – *Moderate Weight*
- Investment in the construction sector at the construction stage – *Limited Weight*
- New residents moving into the area will bring an economic benefit to the Council such as through additional Council Tax payments – *Limited Weight*

11.19 When weighed against the perceived ‘harm’ arising from the proposed development which in our view amounts to the following:

- Less than substantial harm, at the lower end of the scale, upon 82-84 High Street as a non-designated heritage asset – *Moderate Weight*

11.20 It is clear that adverse harms do not demonstrably outweigh the benefits of the scheme in accordance with paragraph 11 d) ii of the NPPF.

11.21 Accordingly it is our view that, the appeal should be allowed and permission granted in accordance with paragraph 11 d of the Framework.

12 Summary and Conclusions

12.1 The Planning Appeal Proposal seeks detailed planning permission for the creation of 6no. self-contained flats within the existing building with associated cycle and bin storage, following the change of use of first floor from office (Class E) to residential (Class C3), the erection of a two storey rear extension with balconies and terraces, alterations to the rear of the building including a mansard roof and terraces and the retention and reconfiguration of the Class E unit at ground floor level with alterations to fenestration.

12.2 The Appeal Proposals have deliberately been designed to comply with adopted Local and London Plan policies and the analysis set out throughout this statement confirms that there is over-arching planning policy support for the Appeal Proposal at the national planning policy and local development plan level.

12.3 The Appeal Application was supported by a suite of specialist reports which confirm that the Appeal Proposal is supported at all levels of planning policy and that there are no technical or other matters which would prevent the Appeal being allowed.

- 12.4 This Statement demonstrates that the Appeal Proposals have been carefully designed and carefully considered having regard to the character and appearance of the surrounding conservation area and the non-designated heritage asset.
- 12.5 It has been demonstrated that the Appeal Proposal represents sustainable development and that it responds to key objectives of the NPPF. Other material benefits are extensive.
- 12.6 Having regard to the provisions of the development plan and all relevant material considerations, we respectfully request that this appeal should be allowed, and planning permission should be granted for this important proposal.