

TOWN AND COUNTRY PLANNING ACT 1990

STATEMENT OF CASE

Proposed Residential Development

Site at:
52 Field End Road
Pinner
Middlesex
HA5 2QN

For:
Mr Neil Richardson

LPA Ref:
4913/APP/2016/4358

Statement prepared by
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1.0 **INTRODUCTION**

- 1.1 The planning application the subject of this appeal seeks the creation of two additional dwellings by the alteration of an existing semi-detached house to create two dwellings and a further dwelling erected in the rear garden, all being served off the existing access. The plans are attached to this submission along with a suite of comprehensive documents prepared by Mr Richardson's consultants.
- 1.2 The planning application followed not one but two pre-app submissions. The first made by Mr Richardson directly and the second by his architect Mr O'Connor. Mr Richardson is not a developer but the owner and occupier of 52 Field End Road. He wishes to alter the existing property and to build a new dwelling in part of the rear garden in order to satisfy the housing needs of his immediate family.
- 1.3 The response to his 2015 submission is attached to this statement (**Appendix 1**) and as can be seen it raises some matters which are to be expected but, there is no in principle objection to the new-build in the rear garden and nor, despite referring to the adjacent hotel, is there any comment about its setting (as a listed building).
- 1.4 In 2016 Mr Richardson retained Mr O'Connor who oversaw a follow up pre-app which included more detailed plans. The response identified matters which could be problematic, but did not find wanting, and identified details which would need addressing in any further iterations of the proposals.
- 1.5 These centred upon the new dwelling but again, and significantly, there was no in-principle objection to the proposal as a whole or the new dwelling in isolation, no mention of the adjacent listed building and no suggestion that any similar proposal, were it to be submitted formally, would be rejected. Indeed there were useful comments as to what needed to be addressed.
- 1.6 Whilst it is acknowledged that pre-application negotiations are not binding on the Council they nonetheless are material considerations. That being the case the applicants and their advisors were perturbed that the officer's report (attached to this appeal) to committee in respect of the subsequent application in referring to "*various pre-application advice*" concluded that an "*objection was given.*" It was also the first mention of the adjacent listed building.

- 1.7 Whilst there remained no objection to the creation of two dwellings from the existing house, a matter in respect of which there has been consistency by the Council, the recommended refusal rested on the rear dwelling. This was accepted by Members and although the decision is attached, the reasons are set out below:

"1. The proposed development results in inappropriate development of garden land, resulting in harm to the character and appearance of the surrounding area. The current garden land has a spaciousness and openness which makes an important contribution to local character and the setting of the adjoining Grade II Listed Building. There is insufficient space to do significant boundary planting to mitigate the impact on the setting of the Grade II listed Tudor lodge hotel which will appear more enclosed as a result of the proposal to the detriment of the setting of the listed building, furthermore it is considered that existing boundary trees within the grounds of the Tudor Lodge would be damaged or have to be removed as result of the proposal exacerbating the impact. The loss of the garden land will be detrimental to the visual amenity of the area and the wider street scene which is characterised by development in landscaped grounds. The development would be cramped and the layout, siting and scale of the new dwelling would not respect or improve the existing pattern of buildings. There is also considered to be harm caused by the amount of hardstanding proposed to the side and rear of the existing dwelling and proposed attached dwelling in order to gain rear access and to provide rear parking. The proposals would therefore be contrary to Policies 7.4 and 7.6 of The London Plan (2016), Policy BE1 of the Hillingdon Local Plan: Part One – Strategic Policies (November 2012) and Policies BE4, BE10, BE13 and BE19 of the Hillingdon Local Plan: Part Two – Saved UDP Policies (November 2012), Policies 3.5, 7.1 and 7.4 of The London Plan (2015) and the NPPF (March 2012).

2. The proposed development by reason of the close proximity of the proposed parking spaces, would be detrimental to the residential amenity of the occupants of Number 54 Field End Road by reason of the noise, disturbance and potential light pollution. As such the proposal would fail to comply with Policies BE19, BE21 and OE1 of the Hillingdon Local Plan Part Two – Saved UDP Policies and the adopted Supplementary Planning Document HDAS: Residential Layouts."

1.8 The first reason is the more substantial. Despite being at variance with considered opinions expressed in the two pre-apps it nonetheless has to be addressed and it will be demonstrated that, latter day or not, the Council has exaggerated the impact of the new dwelling.

1.9 The second reason for refusal whilst not accepted could nonetheless have been discussed and, notwithstanding the objections in the first reason, overcome. To this end revised plans which show variations on the parking arrangement have been prepared for this appeal and are offered to the Inspector (and other parties) for consideration.

1.10 This statement is set out as follows:

1.0 Introduction.

2.0 Description of the Site and Surroundings.

3.0 Review of the Relevant Policy and Guidance.

4.0 Planning Analysis.

5.0 Summary and Conclusions.

Appendix 1 – 2015 and 2016 Pre-App Responses.

Appendix 2 – List Entry for Field End Lodge (Tudor Lodge Hotel).

Appendix 3 – Extracts from Policy not referred to by LBH (Policy 2.6 London Plan and London SPD 1.2.44-5, Policy H2 Draft London Plan).

Appendix 4 – Revised Plans (parking for rear house).

2.0 **DESCRIPTION OF THE SITE AND SURROUNDINGS**

2.1 The postal address of the site is Pinner in what was once Middlesex, but it is part of an area where very largely 20th Century development has subsumed older small towns, villages and individual properties. There is a certain uniformity of generally low rise, medium density built development interspersed with green space but there is an eclectic range of individual buildings and subtle changes in character.

- 2.2 The appeal property and its conjoined semi probably date from the 19th Century but are much altered and extended. Elsewhere most of the buildings are mid-20th Century or newer. An area of 1930's housing to the north was designated as a Conservation Area in 2010 and to the north of that, Eastcote Village has been at the core of a Conservation Area since 1972/3.
- 2.3 The hotel next door is a statutorily listed building. On a casual inspection it resembles a 1930's 'Tudorbethan' roadside establishment but at its heart lie 16th and 17th Century structures. A copy of the listing is attached in **Appendix 2**.
- 2.4 A series of Google Earth Aerial images is scanned in below and over. The first shows the variety in built form. The appeal property is marked by the white circle. There are spacious landscaped buildings to the east, the hotel, its outbuildings and car park to the north east and most of the area along the northern fringe of the image lies within the Conservation Areas.



- 2.5 The image over is at larger scale. Again 52 is identified by a red dot and its rear garden is clear to see framed by the hotel car park, hotel annex, a garage court and gardens to the rear to the rear of properties in The Sigers and the rear garden of 54 Field End Road.



2.6 The final aerial image below shows the house, its plot and its surroundings in greater detail and may be usefully compared with the application drawings. In particular the main hotel car park, annex and car park and the detail of properties in The Sigers is clear to see.



- 2.7 Mindful of the Council's assertion that the current rear garden is a green and open space, which contributes to both the character and setting of the locale and the setting of the adjacent listed building, scanned in below/over are two Google Streetview images from July 2017. The first is looking northwards along the bend in the road with the existing garage to No.52 in the centre of the image and the hotel to the right. Travelling in this direction there are neither views, nor perception, of the rear garden at No.52.



- 2.8 The other image (over) is looking south west across the hotel car park towards the rear garden. As can be seen the view is framed by parked cars in the hotel car park and then, left to right, the flank of No.52, the rear elevations of flats in The Sigers and the hotel annex. A similar view is shown later in this statement with the proposed dwelling superimposed.



- 2.9 The only other public vantage point with a view of the rear garden, or more precisely the air space above it, is as glimpsed fleetingly between properties in The Sigers and over the garage court to their rear. It can be seen below.



- 2.10 The Inspector will obviously look closely within and around the site but the images below (May 2017) are taken from within the site and looking outwards. The first five images show the northern corner (the hotel annex) the north eastern boundary and the rear of No.52.



- 2.11 The next series shows the boundary with No.54, the southern corner of the garden and then along the southern boundary with The Sigers.



- 2.12 The final images are looking from the northern corner and the site of the proposed dwelling back across the garden towards No52 and No.54 and then panning south west to the flats and houses in The Sigers.



3.0 **REVIEW OF RELEVANT POLICY AND GUIDANCE**

- 3.1 In order to examine the Council's case, it is most useful to focus on those policies cited either in the decision or the delegated report where they informed the decision. It is assumed that in due course as part of the appeal process the local planning authority will supply full extracts of all the policies it considers to be relevant. Policies not cited by the Council, but considered to be material considerations are attached in **Appendix 3**.

The Development Plan

- 3.2 The Development Plan comprises: **The London Plan – The Spatial Development Strategy for London consolidated with alterations since 2011- published March 2016, the Hillingdon Local Plan: Part 1 Strategic Policies (adopted November 2012) and the Hillingdon Local Plan: Part 2 – UDP (adopted 1998) policies as saved in 2007 and 2012.**
- 3.3 The Council has been preparing a replacement Part 2 document to complement the Part 1 Strategic Policies, in the form of Development Management Policies, Site Allocations and a Designations and Policies Map, which will replace the remaining saved UDP Policies. This suite of documents was anticipated to be submitted for Examination in "summer 2017", but presently no up-to-date information is available. None of these emerging documents is referred to by the Council.

The London Plan

- 3.4 **Policy 2.6** (and paragraphs 2.25-2.32) is concerned with Outer London (which includes London Borough of Hillingdon). It is couched in necessarily general overarching terms as to what more detailed local policy should seek to achieve. This includes that: *"The significant differences in the nature and quality of outer London's neighbourhoods must be recognised...."*
- 3.5 Paragraph 2.25 recognises that Outer London accommodates 60% of the city's population, 40% of its jobs and that in general, *"it is greener, and its people healthier and wealthier"* and that it is likely to experience considerable population growth over the period to 2036. Paragraph 2.31 states that *"A generally high quality of life is one of outer London's major assets. Maintaining this where it exists, and enhancing it where necessary, will be key to the area's future success – a high quality environment, and providing places where people will want to work and live, will be important to attracting and retaining the kind of economic sectors which may lift growth in outer London"*.
- (A3)**
- 3.6 **Policy 3.5** (and paragraphs 3.32-3.39) is concerned with the quality and design of new housing. It includes references to minimum internal space standards and paragraph 3.34 refers to existing back gardens thus:

"Directly and indirectly back gardens play important roles in addressing many of these policy concerns, as well as being a much cherished part of the London townscape contributing to communities' sense of place and quality of life. Pressure for new housing means that they can be threatened by inappropriate development and their loss can cause significant local concern. This Plan therefore supports development plan-led presumptions against development on back-gardens where locally justified by a sound local evidence base. Such a presumption has been taken into account in setting the Plan's housing target. The London-wide SHLAA assumed a theoretical reduction of 90% in the historic level of garden development, so there is no strategic housing land availability obstacle to the formulation of relevant DPD policies that seek to protect back gardens or other private residential gardens from housing development."

3.7 **Policy 7.1**, under the heading “*Place Shaping*”, refers to Lifetime Neighbourhoods. The Strategic Policy (A) proposes that:

“In their neighbourhoods people should have a good quality environment in an active supportive local community based on the lifetime neighbourhoods principles set out in paragraph 7.4A.”

3.8 There is no paragraph 7.4A but Policy 7.4 (Local Character) has clauses A, B and C thus:

“Strategic

A *Development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of the surrounding buildings. It should improve an areas visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.*

Planning decisions

B *Buildings, streets and open spaces should provide a high quality design response that:*

- a *has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass*
- b *contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area*
- c *is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings*
- d *allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area*
- e *is informed by the surrounding historic environment.*

LDF preparation

C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process."

3.9 **Policy 7.6** is titled "Architecture". The strategic goal is that architecture should make a positive contribution and sets out a checklist not unlike that in Policy 7.4 above.

3.10 When the London Plan was last republished, its companion **SPD** was also updated and it elaborates upon Policy 3.5 above. Two paragraphs concerned with Private Garden Land Development are reproduced in full below:

"1.2.44 London Plan Policy 3.5A states that 'Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.' This locally sensitive approach reflects paragraph 53 of the NPPF. Where planning permission is required, boroughs are advised to consider proposals for development in gardens in the light of local circumstances, taking into account the value gardens have in addressing the range of strategic policy objectives, particularly in terms of:

- *defining local context and character including local social, physical, cultural (Policy 7.4, 3.5);*
- *providing safe, secure and sustainable environments and play spaces for children (Policy 3.6);*
- *supporting biodiversity, protecting London's trees, 'green corridors and networks' (Policies 7.19, 7.21);*
- *flood risk management and sustainable drainage (Policies 5.12 and 5.13)*
- *mitigating the effects of climate change including the 'heat island' effect and urban greening (Policies 5.1, 5.9, 5.10); and*
- *enhancing the distinct character of suburban London (Policy 2.6).*

1.2.45 Boroughs should seek to strike an appropriate balance between these and other London Plan policies, in particular the strategic objective to provide a wide choice of homes Londoners can afford, including family sized units, taking account of the specific needs of large families (Policy 3.8). Alongside new build provision and turnover within the existing housing stock, extensions to existing homes and the sensitive renewal and intensification of existing residential areas is likely to play an important role in meeting demand for larger properties in the capital, helping to address overcrowding and affordability issues in certain areas."

(A3)

Hillingdon Local Plan: Pt1 Strategic Policies

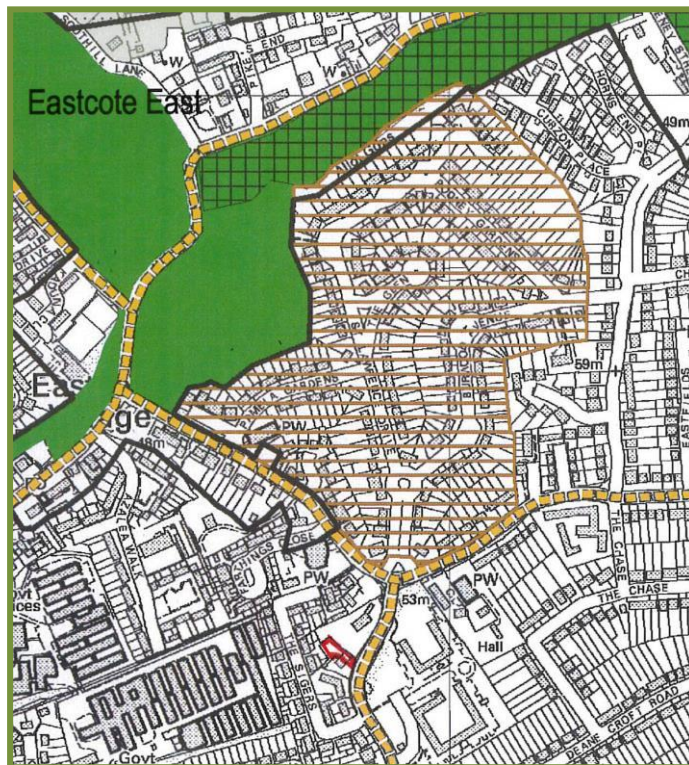
3.11 **Policy BE1** is a borough-wide policy aimed at ensuring that new development improves and maintains the quality of the built environment. To this end, it has an eleven point checklist wherein the following are the most relevant in this instance:

- "1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;*
- 2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;*
- 9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas."*

Saved UDP Policies

3.12 An extract from the interactive policies map (Eastcote East inset), which is based on the adopted policies reviewed above (but which does not take account of the still emerging Part 2 Policies) is scanned in over with the site edged red. As can be seen, neither the

site nor any of its immediate surroundings along and off Field End Road enjoys any specific designation or allocation; being what used to be called "white land". Since this time the Eastcote Park estate (brown/yellow horizontal lines) has been designated as a Conservation Area and the Eastcote Village Conservation Area (black line) has been extended but neither is adjacent to, nor read with, the appeal site.



- **BE4** – is concerned with development either within or on the fringes of Conservation Areas which does not apply to the appeal site and has presumably been referenced in error in the decision notice.
- **BE10** – is concerned with listed buildings and cross referenced to PPG15 which was replaced by PPS5 in 2010 which was then superseded by Section 12 of the NPPF (see below) in 2012. This notwithstanding it normally presumes against granting planning permission for planning proposals which *"are considered detrimental to the setting of a listed building"*.
- **BE13** – one of a suite of Design policies which seeks to ensure that development harmonises with *"the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance"*.
- **BE19** - one of a suite of Residential Amenity policies, the aim of which is to *"seek to ensure that development within residential areas complements or improves the amenity and character of the area"*.

- **BE21** – provides that planning permission will not be granted for new buildings which by virtue of *“their siting, bulk and proximity would result in a significant loss of residential amenity”*.
- **OE1** – is contained in the *“Other Environmental”* considerations section. It presumes normally against *“uses and associated structures”* likely to become detrimental to the character or amenities of surrounding properties or to the area generally.
- **H12** – referred to at the pre-app stage and listed in the report but not cited in the decision is concerned with tandem/backend development. It states that such proposals *“will only be permitted if no undue disturbance or loss of privacy is likely to be caused to adjoining occupiers”*.
- **R17** – is a general policy which lists those things which, where appropriate, may be secured through Planning Obligations.

Other Policy and Guidance

The Emerging London Plan

- 3.13 Attach in **Appendix 3** is Policy H2 of the draft of the emerging London Plan which was consulted upon recently. It has yet to be tested and adopted but it indicates the direction of travel of the current Mayor regarding the supply of housing sites. As can be seen it seeks a significant increase in the contribution of small sites and it supports small and medium house builders and self builders.

Supplementary Planning Documents

Hillingdon Design and Accessibility Statement (HDAS) Supplementary Planning Document – Residential Layouts (July 2006)

- 3.14 The HDAS SPD is referred to in the second reason for refusal. Whilst clearly considering larger and more comprehensive developments and not addressing proposed parking to the rear of existing dwellings para.4.37 is presumably the consideration upon which the Council relies. It states that:

“Where parking is located to the rear of a proposed development, it should not result in a reduction in residential amenity as a result of noise emissions and increased activity”

National Policy and Guidance

- 3.15 National policy and guidance is to be found in the National Planning Policy Framework (NPPF), published in March 2012 and the complementary National Planning Policy Guidance (NPPG) published online in March 2014 and periodically revised and updated. Each document is a material consideration in both plan making and decision taking.
- 3.16 The **NPPF** in particular should be read as a whole and its overarching message is that there is a presumption in favour of allowing development that is sustainable in an economic, social and environmental sense. Those paragraphs of particular relevance to the proposal are as follows:
- 1-2, 6-7, 11-14, 17, 47-49, 56, 60-61, 126, 128-129, 131-134, 186-187, 196-197, Annex 2 Previously Developed Land.

4.0 PLANNING ANALYSIS

Introduction

- 4.1 Applicants are encouraged to engage in pre-application negotiations so that both parties can identify the principal issues raised by a proposal and how, indeed whether, there is merit in proceeding to a formal application. Not once but twice Mr Richardson and his agent made pre-app submissions.
- 4.2 They did establish one matter namely that the Council has no objection to the alterations to No.52 so as to create two dwellings and that the associated features, principally access, parking, amenity space etc. were also appropriate for the size of the two newly erected dwellings. This is confirmed by the decision notice which has no objection to the conversion aspect of the proposal.
- 4.3 A fundamental part of the pre-app process was also to canvass opinion on the new detached dwelling to the rear of No.52. This was considered on both occasions by the case officer and the assessment is clearly set out. It is acknowledged that matters of spacing, overlooking etc. were all raised and in various iterations culminating in the formal submission addressed, but at no point was it suggested that the rear garden was important in its own right to the character and appearance of the locale or the setting of the adjacent listed building.

- 4.4 The tenor taken in the report and the decision notice is altogether different resting as it does on the premis that the space is inappropriate for development. Previously it was a matter of careful and sensitive development of the space which is entirely different. Despite various opportunities it was not said that the garden land should not be developed.
- 4.5 This change is telling and it also lacks support from the Council's in house specialists who were consulted (namely Conservation and Trees – see below). It is contended that this change of stance lacks any credible planning foundation and that, having regard to relevant policy and the situation which pertains at the site and surroundings, it is unreasonable. To this end it is proposed to examine the two reasons and in so doing relevant parts of the Officers Report insofar as it appears to amplify them.

Reason No. 1

- 4.6 The reason has five related constituent parts as follows.

Inappropriate development of garden land therefore
causing harm to the character and appearance of the surroundings.

- 4.7 Firstly the development of garden land in policy terms is not in principle inappropriate as the review of local and national policy makes clear. This is not Green Belt where development that is definitionally inappropriate is definitionally harmful but rather an area of 'white land' in a borough where there are numerous designated areas wherein it may be inappropriate.
- 4.8 The loss of part of the garden to a house is not inappropriate as a matter of principle. It may be unacceptable if it impacts upon its surroundings and this can be measured both objectively and subjectively. Objectively the Council has no criticism in terms of separation distances, loss of privacy, provision of amenity space or the amenities which would be enjoyed by the new house. The specific concern about the proposed parking is discussed below.
- 4.9 The concern seems to be a subjective or visual case as reflected in the second part of the reason.

The garden has a spaciousness and openness important to the area and the setting of the listed building

- 4.10 Even on the aerial images scanned in above the gardens of No.52 and No.54 do not stand out and as proposed to be redeveloped much of the space at No.52 will remain open. Even on plan the appearance belies the Council's description and in terms of public views either across or into the site these are extremely limited as demonstrated above and as will be seen by the Inspector.
- 4.11 Insofar as one can see into the site it is surrounded by existing buildings. As proposed to be developed the existing garage would be removed allowing a view down the extended driveway. Were that to happen now it would open up views of the hotel annex. Were the proposed dwelling built it would simply eclipse the annex and foreshorten that view. This point was acknowledged in the second pre-app response in which the case officer observed that:
- "there is an existing two storey building to the rear of the site associated with the hotel, therefore the siting of a dwelling in this location would not be out of keeping with the urban grain in this location"*
- 4.12 A great deal is made by the Council of the relationship with the listed building. This is clearly a much altered building at the core of which are some older timber framed structures. These are disguised by modern extensions, external finishes, outbuildings, signage and an extensive car park within which is the annex. The car park and the annex occupy all the not inconsiderable space between the listed building and the appeal site as is clear from the images referred to already.
- 4.13 Mr Richardson took some similar photos across the car park to his property last autumn and these are scanned in over.



- 4.14 Upon these (below) he has had superimposed the existing house (No.52) as it would be altered and the new dwelling as it would be seen alongside the annex. On the latter the parked car has been 'removed' as it would have hidden the ground floor of the house. It is necessary to look at the proposed plans which confirm that the new house is right at the back of the garden and the majority of the boundary with the hotel will remain as it is albeit with the existing flat roofed garage at No.52, which is more visible, removed. The boundary is discussed below.



- 4.15 Mindful of the policy guidance in section 12 of the NPPF this is primarily aimed at proposals which directly effect heritage assets in terms of their physical fabric and or use and or the public perception or access to the asset. This is simply a new structure being proposed on an adjacent site and the visual impact is analysed above. This notwithstanding, in terms of the level of harm that it could occasion it clearly would not be substantial or total. It must be in the "less than" category and it is contended that it is very little.

No space to plant the boundary and threat to trees

- 4.16 As can be seen from the various images and drawings there is little vegetation within the site and certainly nothing substantial. One tree within the site is proposed for removal (to the rear of No.54) but it could be retained if the parking for the new dwelling is relocated (see below). The boundary trees all stand along the fence line but within the grounds of the hotel. These are not in the control of the applicant and one specimen alongside the existing garage to No.52 was removed by the neighbour in 2017.
- 4.17 The trees line the edge of the car park and significantly the two which are closest to the hotel annex and the new dwelling are conifers and will remain in leaf all year round. Were these boundary trees to be removed or to die then it is up to the owners of the hotel to replace them or not. If they do not, the view as now would be across the airspace above the gardens of No.52 (subdivided) No.54 and the new dwelling against a backdrop of the buildings in The Sigers. If the trees are replaced then in time the view would be obscured.
- 4.18 In this context it is irrelevant whether the site can be screened internally. It would appear little different and it is not accepted that the introduction of one modest house to the rear of the garden screened as present, or not screened should planting at the hotel be lost, would make any material difference to the setting of the listed building. It is quite clear from the report that the Conservation Officer did not object on these grounds he or she merely made observations which are similar to those above.
- 4.19 Notwithstanding what is proposed within the site along the boundary or, what the adjoining freeholder may do with trees in their ownership, it is suggested by the Council that the proposal is prejudicial to the boundary trees which may be "*damaged or need to be removed*". The application is accompanied by a comprehensive arboricultural report which was submitted at the outset and the Council's retained expert has no objection on arboricultural grounds.
- 4.20 Significantly, and not unlike the stance in respect of the expert advice from the Conservation Officer, the officers report in the planning issues discussion concludes having regard presumably to the same information that there are "*serious concerns regarding the long term protection and retention of these trees should the rear dwelling be erected.*" It is assumed that the planning officer does not have arboricultural

qualifications and this assertion flies in the face of the experts representing both the applicants and the Council. As, if and when the Council qualifies these '*serious concerns*' then the applicants will respond as necessary as the appeal progresses.

That the new house is cramped and out of scale

- 4.21 As mentioned above there are no objective criticisms of the proposed house to substantiate this view and it contradicts views expressed at the time of the second pre-app (4.11 above). It is a modest two storey dwelling carefully designed and laid out internally so as not to impact upon the neighbours or create unsatisfactory living conditions for the occupants. During the second pre-app and subsequent formal application considerable attention was paid to the design of the roof to minimise its height and this complied with the officer's requirements.
- 4.22 The proposed house takes up a part of an existing rear garden the status of which has been exaggerated by the Council and this proposal puts it to good use in a fashion which accords with the policies of the emerging London Plan and indeed the current plan which recognises that such sites can, should and need to come forward if Londoners are to find the houses which they need. It should only be refused if any environmental considerations outweigh these social and economic benefits and thus far none is obvious. This test is central to the NPPF and relates to the assessment of harm to the listed building.

Harmful amount of hardstanding proposed

- 4.23 It is insufficient to say, as the report and decision do, that the additional hardstanding causes harm; the Council needs to identify and quantify the harm. It also ignores the fact that via domestic permitted development rights the applicants could hard surface their existing rear garden. In a similar vein they could also cover significant areas with incidental outbuildings. Equally they could demolish the existing garage and whilst relocating it in the rear garden could introduce a driveway and hardstanding.
- 4.24 The new surfacing is not in public view, would be permeable and where relevant would be laid out so as not to cause harm to the boundary trees. The hardstanding is relevant to the second reason for refusal to which I now turn.

Reason No. 2

- 4.25 As has been established above the garden of No.52 already abuts that of No.54 and those of houses and flats in The Sigers. The flats have a garage court alongside the garden of No.52 and on the other side it is adjoined by the hotel car park. It is an urban area wherein the parking and manoeuvring of vehicles takes place and the presence of the hotel car park was acknowledged in the second pre-app response which advised that with careful design the impact of an extended access and the parking could be mitigated.
- 4.26 The reason does not object to the extended driveway to be run along the boundary with the hotel, but specifically the location of the proposed parking spaces to the rear of No.54 Field End Road, the co-joined semi. There is currently a prefabricated garage/store in this location and as stated above were the existing garage to No.52 removed in a similar fashion to what is now proposed then the applicants could lay hardstanding and park vehicles in their rear garden.
- 4.27 Nonetheless as part of this application approval is sought for the parking spaces for the rear house and these are shown at 90 degrees to the boundary fence with No.54 more or less where there is currently a pre-fabricated garage used for domestic paraphernalia. Mindful of the criticism the applicants have explored options which could relocate this parking. They have had prepared two revised site layout plans which remove any parking from behind No.54 and replace it with either two tandem spaces between the new dwelling and the subdivided No.52 or, simple tandem parking in the new driveway.
- 4.28 These two drawings are offered as viable alternatives should the Inspector agree with the Council about the submitted proposal. As they remedy an objection and do so within the site without any consequent impact on either another neighbour or the public realm they would pass the "*Wheatcroft test*".
- 4.29 From a technical point of view although affording tandem parking, unlike many homes in Greater London there is no need to reverse onto or off the public highway. On PL12 it is possible to turn outside the new dwelling and on PL13 the forecourt turning area, also available to the existing (and to be subdivided) house, may be employed. Either is a viable option which would overcome the objections raised in respect of No.54 and are offered to the Inspector should he/she in all other respects be minded to allow the appeal.

Other matters

- 4.30 Comments made by third parties at the application stage have been considered. Insofar as they raise planning matters and are reflected in the Council's position they are dealt with above.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 Whilst it is not unusual for elected members to disagree with the professional advice before them it is rare to see a report to committee which is so inconsistent with pre-application advice and advice from internal consultees' comments on an application.
- 5.2 All the parties agree that there are no reasons to withhold approval to convert No.52 into two dwellings. There is, however, a divergence of opinion regarding the new dwelling.
- 5.3 The authors of the report consider that the building of a modest dwelling on part of the rear garden would occasion harm to both the character and appearance of the street scene and locale and the adjacent listed building. Its case rests on five considerations.
- 5.4 This statement has looked carefully at the site and surroundings, set out the relevant policies and examined all 5 matters in order to establish whether this inconsistent and altered stance is justified. As has been demonstrated, it is not.
- 5.5 There is no reason why the recommendation should have objected to the additional dwelling and the criticisms in respect of the boundary trees and the not unrelated impact upon the listed hotel are not supported by the Council's specialists. Whilst the first reason raises appropriate considerations, the impact is exaggerated and not substantiated and should not be upheld.
- 5.6 The second reason is different. Mindful of the site and its setting it is not accepted that the proposed parking for the new dwelling would be materially prejudicial to the enjoyment of No.54. It is, however, something which could have been discussed and negotiated thereby removing any perceived or potential problem.
- 5.7 Two revised plans have been prepared and are attached for the Inspector's consideration should he/she accept this objection but in all other respects be minded to

approve the proposal. Mindful of the Wheatcroft Principle they remedy any perceived problem in a fashion which has no repercussions on the public domain. They are commended to the Inspector.

- 5.8 For all the above reasons it is concluded that subject to the imposition of appropriate conditions the appeal should be allowed.

Appendix 1
2015 and 2016 Pre-App Responses

Response to Pre-App

(This was for a different building, where I was proposing to build over the garage.)



Monday 17/8/15
2.30

Mr Neil Richardson
52 Field End Road
Eastcote
HA5 2QN

Planning Applications Team
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge

Tel: 01895 250230
Case Officer: Liz Arnold
Email: lamold@hillington.gov.uk
Date: 5th August 2015

Dear Mr Neil Richardson

RE: Part demolition of existing building and construction of an additional dwelling within the site

SITE: 52 Field End Road Eastcote Pinner

I refer to your request for pre-application planning advice dated 12 June 2015 and our subsequent meeting of 13 July 2015, relating to the above development. The advice provided is based on the observations at the site visit and the following drawings and documents issued to the Local Planning Authority for consideration:

Plans Numbers: Existing Front Elevation - received 12 Jun 2015
Existing Ground Floor Plan - received 12 Jun 2015
Proposed Ground Floor Plan - received 12 Jun 2015
Proposed First Floor Plan - received 12 Jun 2015
Proposed Second Floor Plan - received 12 Jun 2015
Proposed Front Elevation - received 12 Jun 2015
Proposed Rear Elevation - received 12 Jun 2015

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

The Site and Surrounds

The application site is located on the north western side of Field End Road and is bordered to the east and north by the Tudor Lodge Hotel and to the west and south by other residential properties. It comprises a two storey semi detached property with a detached garage to the side. Both this property and the adjoining property have been extended in a similar but not identical way in the past, with a two storey side extensions. The application site has a distinctive

cat slide features between the two front gables, whilst the adjoining property has a front projection. The neighbouring property also benefits from an additional two storey rear extension. To the front there is a gravelled driveway, which can accommodate at least 4 cars and to the rear there is a large L shaped rear garden.

The application site lies within the Developed Area as designated in the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012)

The Proposal

The proposal is for the demolition of the existing garage and two storey side extension and the erection of a detached dwelling. This would result in the existing dwelling returning to the original 2 up/2 down semi detached cottage and the provision of a new 4/5 bed detached dwelling adjacent.

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon Local Plan: Part 1, Saved Unitary Development Plan policies, the London Plan 2015, the NPPF and supplementary planning guidance prepared by both LB Hillingdon and the GLA.

Part 1 Policies:

PT1.BE1 (2012) Built Environment

Other Policies:

AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
H4	Mix of housing units
H12	Tandem development of backland in residential areas
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
LPP 3.3	(2015) Increasing housing supply
LPP 3.5	(2015) Quality and design of housing developments
LPP 3.4	(2015) Optimising housing potential
LPP 3.8	(2015) Housing Choice

PP 7.2	(2015) An inclusive environment
LPP 7.4	(2015) Local character
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010

Main Planning Issues

1. Principle of development

National Planning Policy Framework states there is a presumption in favour of sustainable development which is described for decision taking as "approving development proposals which accord with the development plan."

Policy H4 of the Hillingdon local plan states that wherever practicable a mix of housing units of different sizes should be provided including in particular, units of one or two bedrooms.

Therefore the Council does not have an 'in principle' objection to the extension of the building to provide 2 residential units, subject to the application demonstrating compliance with all of the above criteria and relevant Development Plan policies.

2. Design

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) requires all new development to maintain the quality of the built environment including providing high quality urban design. Furthermore Policies BE13 and BE15 of the Hillingdon Local Plan Part two - Saved UDP Policies (November 2012) resist any development which would fail to harmonise with the existing street scene or would fail to safeguard the design of the existing and adjoining sites.

The application site is situated facing a curve in Field End Road. The two semi detached properties, although extended slightly differently have a balanced appearance, which the loss of the existing side extension would adversely affect the symmetry of the properties. The proposed new dwelling indicates a double gable frontage reflecting the design characteristics of the adjacent properties, but to the rear appears to have a crown roof form which would be incongruous in terms of the appearance of the existing and adjoining properties. Furthermore, taken with the higher roof level to provide accommodation in the loft, the proposed dwelling appears a bulky and incongruous addition to the wider street scene. Therefore it is considered the proposed alterations to the existing dwelling and the creation of an additional dwelling would be detrimental to the character and appearance of the original building and the amenities of the street scene, contrary to policies BE13 and BE15 of the UDP saved policies November 2012.

During discussions in the meeting the possibility of the erection of a detached dwelling in the rear garden was raised. The garden area to the rear of the property covers approximately 365sqm, not including the garden area immediately to the rear of the existing dwelling. In terms of appearance a new dwelling in this location would be screened by the properties to the front although would be visible from the street scene across the adjacent hotels car park. However, there are other policy considerations which may preclude such a proposal, such that it would not be acceptable in principle.

3. Amenity

Policy OE1, OE3 and BE24 of the Hillingdon Local Plan (November 2012) require the design of new developments to protect the amenity and privacy of neighbouring dwellings. Also the proposed development should not breach the 45 degree guideline when taken from the rear elevation of the neighbouring dwelling, ensuring no significant loss of light, loss of outlook or sense of dominance in accordance with Policy BE20 and BE21 of the Hillingdon Local Plan (November 2012).

The proposed dwelling would be sited between the existing dwelling and the hotel car park. Therefore the only property which would potentially be impacted by the new dwelling is the host property. The plans indicate the new dwelling will follow the front building line and although it will project beyond the rear building line, it does not appear to compromise the 45 degree line of sight from the first floor windows. Therefore it is not considered that the proposal would also result in a loss of amenity through overdominance, loss of outlook, loss of sunlight or loss of privacy to the neighbouring property. As such, the proposal complies with the requirement of policies BE20 and BE21 of the adopted Hillingdon Unitary Development Plan (Saved Policies, November 2012).

With regard to the option of a new dwelling in the rear garden, without revised plans it is difficult to give more than a general outline. Policy H12 advises proposals for tandem development of backland in residential areas will only be permitted if not undue disturbance or loss of privacy is likely to be caused to adjoining occupiers. A new property orientated at right angles to nos. 52 and 54 would face over the adjacent hotel car park and towards the properties on The Sigers. Taking a mid point measure from the centre of the garden area to the rear of 18-24 The Sigers, indicates they are situated at a distance of between 19-21m away and at an angle. Therefore it is not considered that a new dwelling would result in the loss of privacy to any of these properties.

Access to the new property could be achieved with a driveway involving the removal of the existing garage to the side of no.52. This has the potential to lead to noise nuisance with cars and people accessing the property along side the existing dwelling. However given that the car park of the adjacent hotel is situated immediately adjacent to the site, with careful design it may be possible to mitigate the potential impact.

Internal Floorspace

Policy 3.5 of the London Plan (July 2011) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment.

The Council's HDAS 'Residential Layouts' standards require a minimum internal area of 63sq.m for 2 bedroom house and between 103-108sq.m for a 4/5 3 storey property. The resultant 2 bed property would have a floor area of approximately 80sq.m and the new dwelling 150sq.m, which would comply with HDAS requirements.

External Amenity Space

Policy BE23 of the Hillingdon Local Plan requires external amenity space "which is sufficient to protect the amenity of the occupants of the proposed and surrounding buildings, and which is useable in terms of its shape and siting."

Paragraph 4.19 of HDAS Residential Layouts states that developments should incorporate usable, attractively laid out and conveniently located garden space in relation to the properties they serve. For a 2 bed property there is a requirement for a minimum of 40sq.m and for a 4/5 bed property, 100sq.m. The total garden area to the rear of the property covers an area of approximately 480sq.m including an area of 74sq.m immediately to the rear of the existing dwelling. Therefore there is more than sufficient garden area to provide adequate amenity space for both dwellings.

4. Highways

No plans have been submitted to demonstrate that the proposal can accommodate 2 parking spaces per dwelling and retain 25% landscaping as required within HDAS guidance. However it is noted the area to the front of the existing property can accommodate 4 vehicles.

The proposal makes no provision cycle storage provision. However, there is more than sufficient space to provide suitable storage.

Policy 5.17 of the London Plan sets out the Mayors Spatial Policy for Waste Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. This arrangement would be as existing.

5. Other

None

6. Planning Obligation and CIL (Mayor and LBH)

The Community Infrastructure Levy (CIL) is a new charge which allows the Council to raise funds from developers undertaking new building projects.

The money raised will be used to pay for infrastructure required to support development - this could include transport schemes, flood defences, schools, health and social care facilities, parks, open spaces and leisure centres. To a large extent, CIL has replaced Section 106 planning obligations as a means of funding infrastructure provision in Hillingdon.

The scheme will be liable for CIL payments.

7. Application Submission

List of documents to be submitted:

- Application Form
- CIL Form
- Location Plan
- Existing Site Plan
- Existing Floor Plans
- Existing Elevations
- Proposed Site Plan
- Proposed Floor Plans
- Proposed Elevations
- Elevational drawings showing the development in the context of the surrounding area
- Planning Statement
- Design and Access Statement (including details of Crime Prevention and

Accessibility)

- Hard and Soft Landscaping proposals
- Energy Assessment/Strategy/Code Level 4

Please note that this list is not exhaustive and other information may be required on the proposals program.

8. Conclusion

There is no in principle objection to a residential development subject to the application demonstrating compliance with all of the above criteria and relevant Development Plan policies. However, in its current form the scale and design of the proposal is unacceptable. The proposed dwelling appears a bulky and incongruous addition to the wider street scene, which would be detrimental to the character and appearance of the original building and the amenities of the wider area.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

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

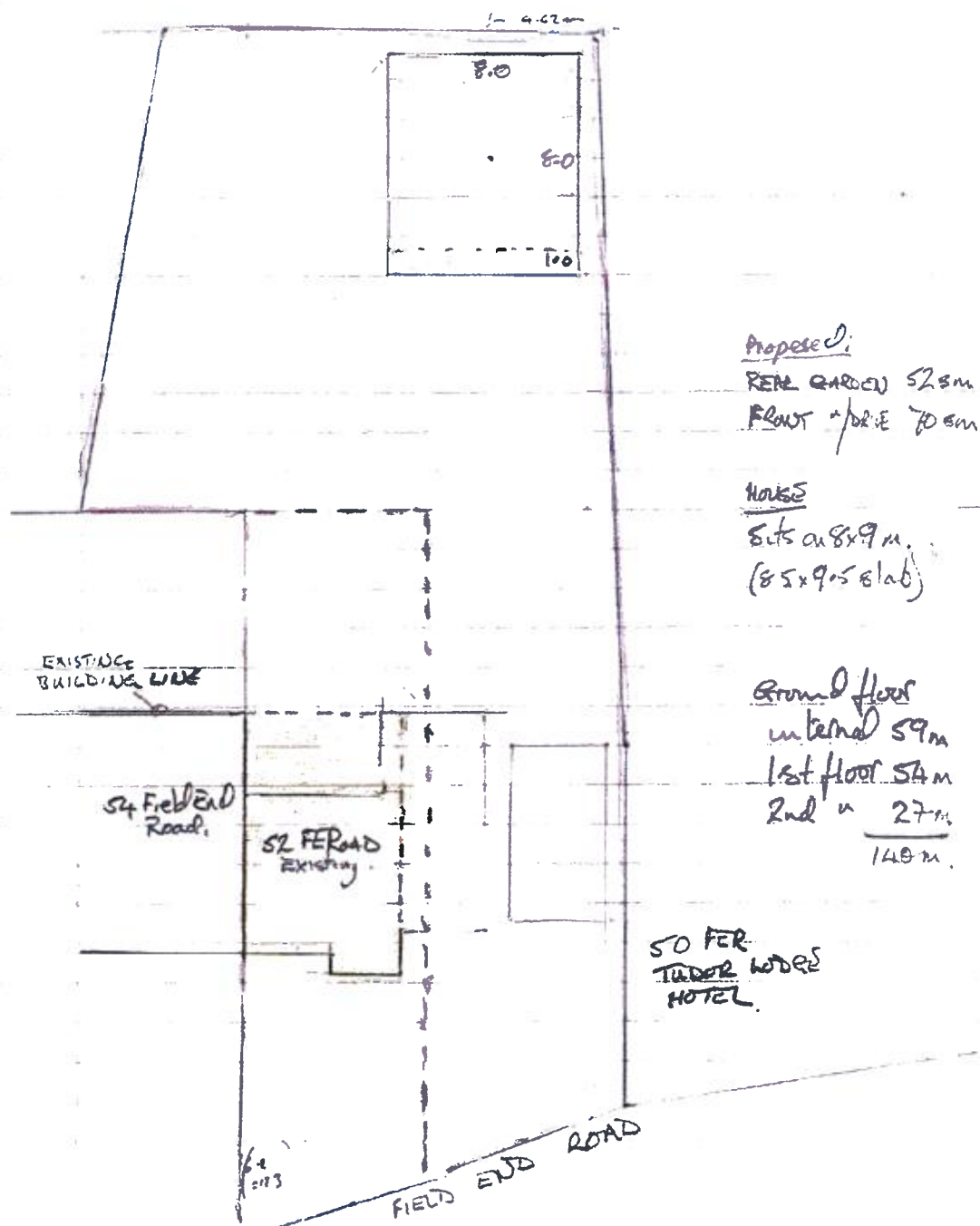
Liz Arnold
Planning Consultant
Major Applications Team
London Borough of Hillingdon

Planning Guarantee

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

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

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

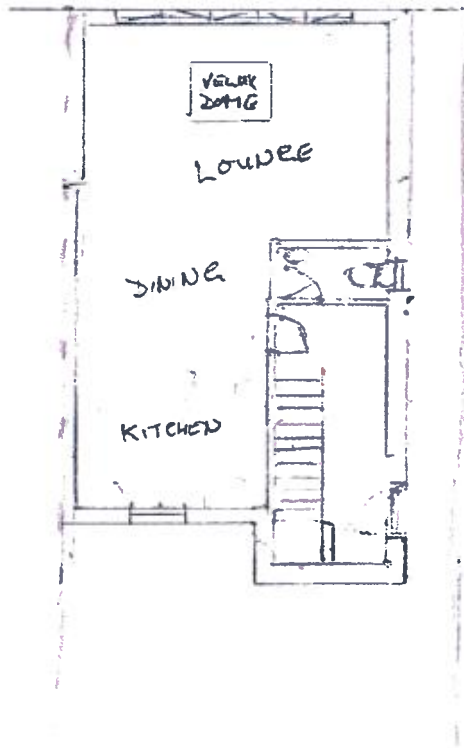


New Build – proposed

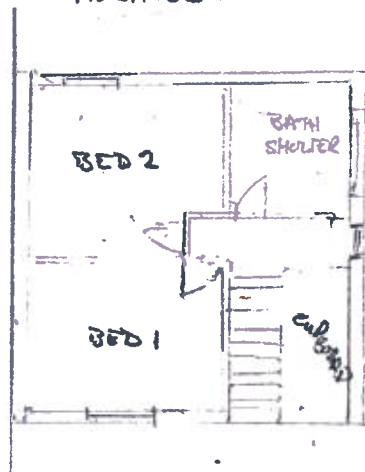
This is viewed from the south, so that the porch faces the road. The front and porch to be in London stocks, reclaimed from the demolished garage.

52 FIELD END ROAD
PROPOSED 4/12/15

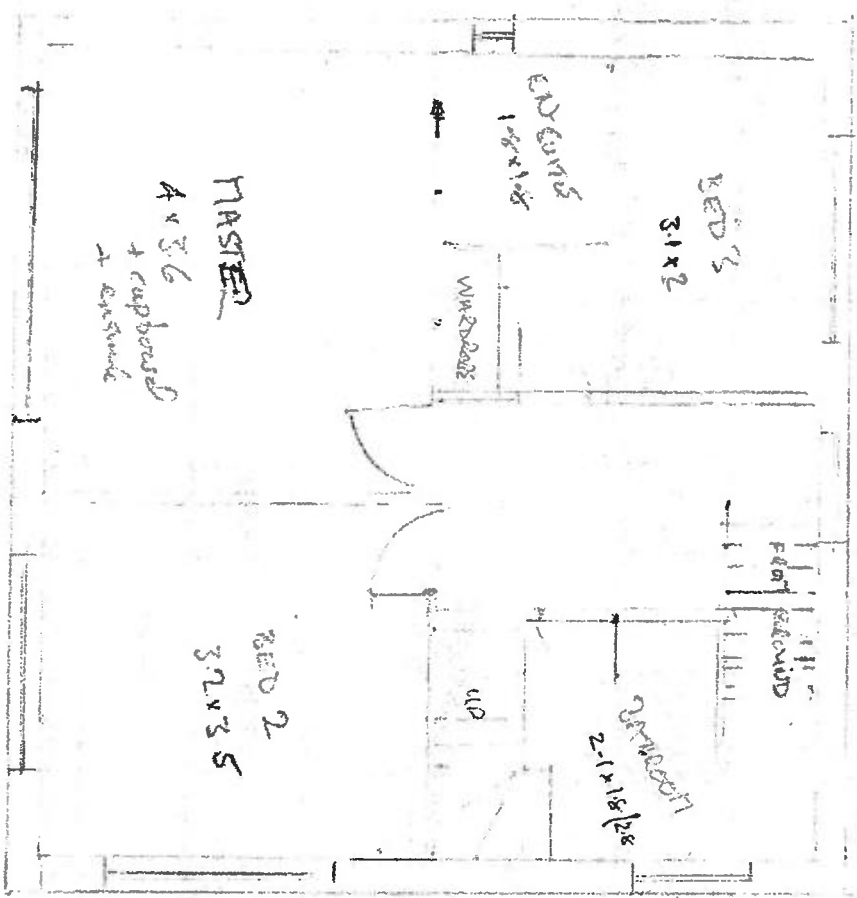
~~GROUND~~
FLOOR PROPOSED
WITH EXTENSION 3.2m to
GROUND FLOOR ONLY



FIRST FLOOR AS EXISTING
MODIFIED PARTITION WALLS



1:100



1:50

LOFT/2ND FLOOR

APPROX WALL
POSITION



APPROX CEILING
POSITION



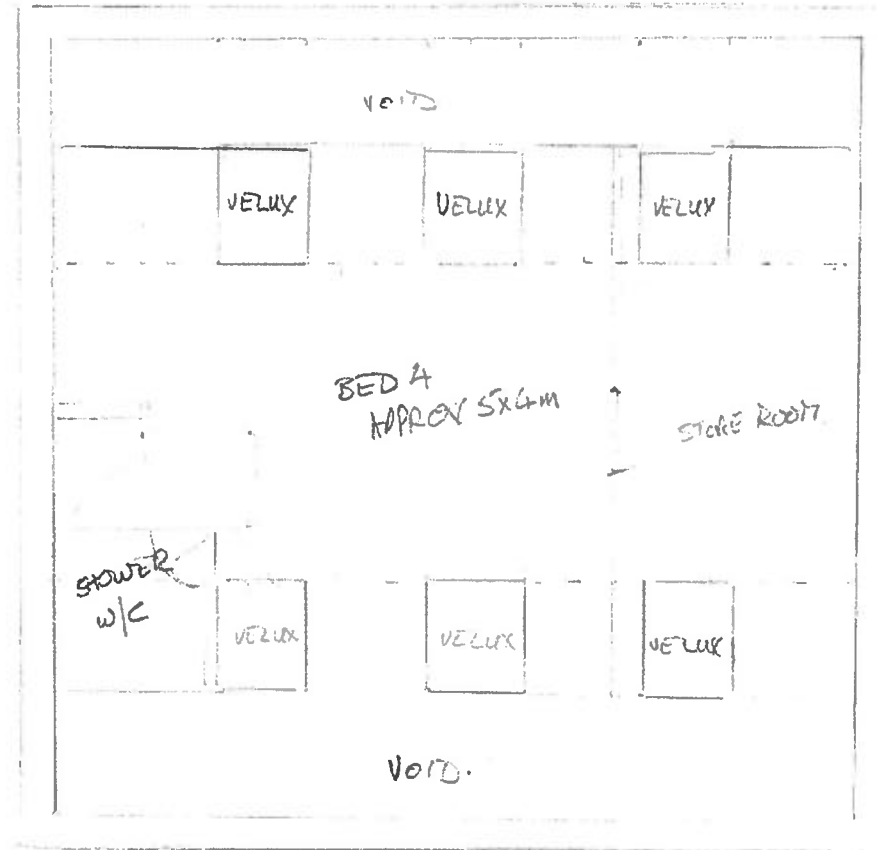
APPROX CEILING
POSITION



APPROX WALL
POSITION



1:50

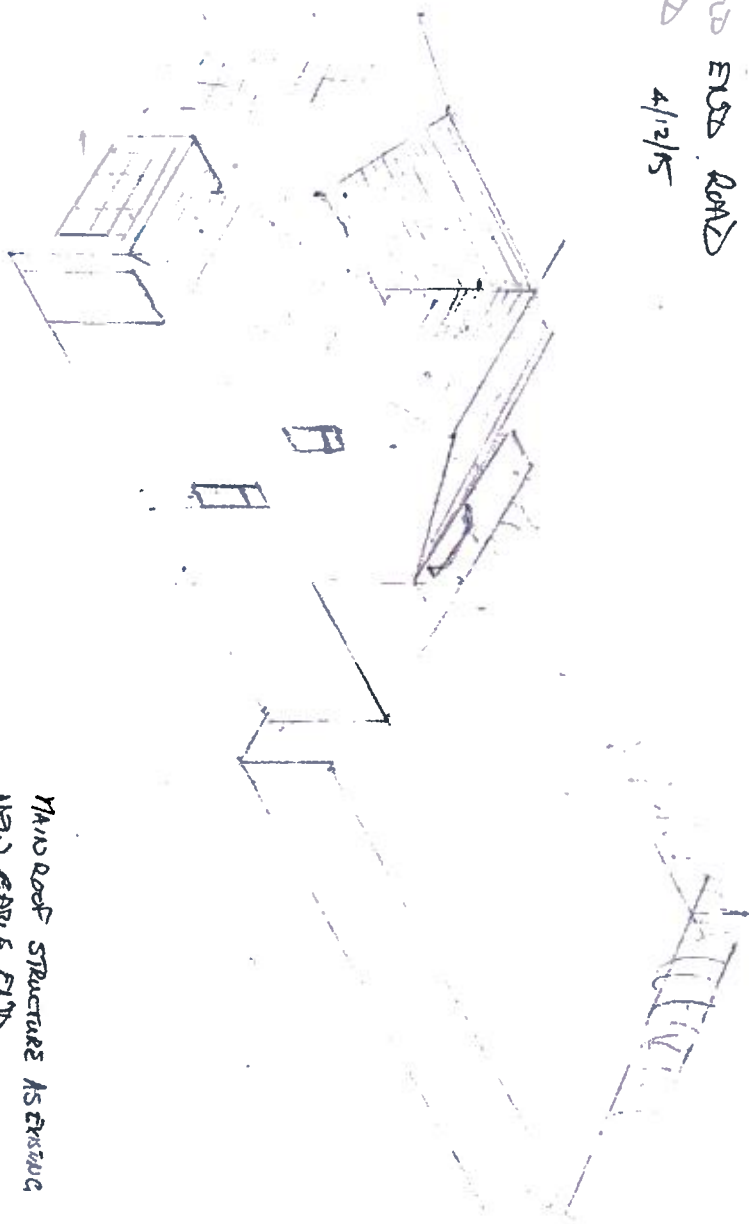


Existing building after demolishing right hand wing, and adding rear ground floor extension

52 FIELD END ROAD
PROPOSED 4/12/15

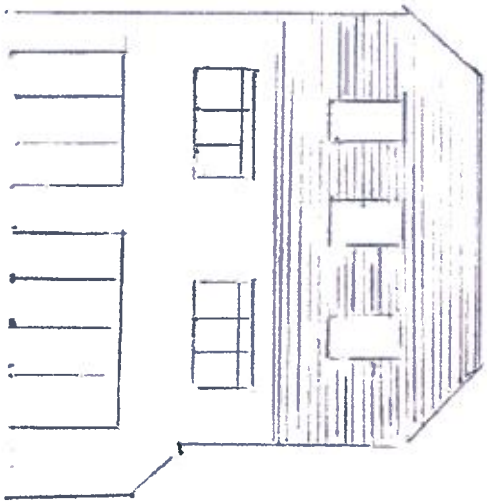
1:50

MAIN ROOF STRUCTURE AS EXISTING
NEW REAR EDD
FURT ROOF WITH VELUX DOTS
TO REAR - KITCHEN 10.54.

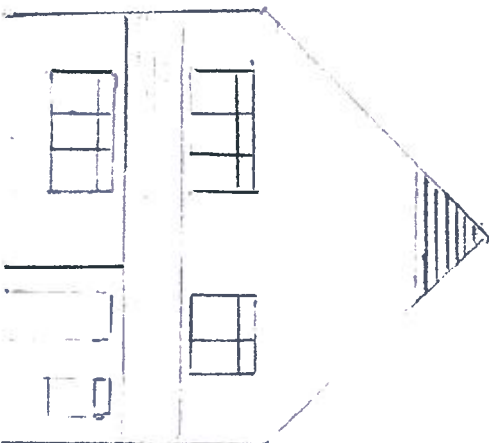


3x VELUX ROOF.

1:100

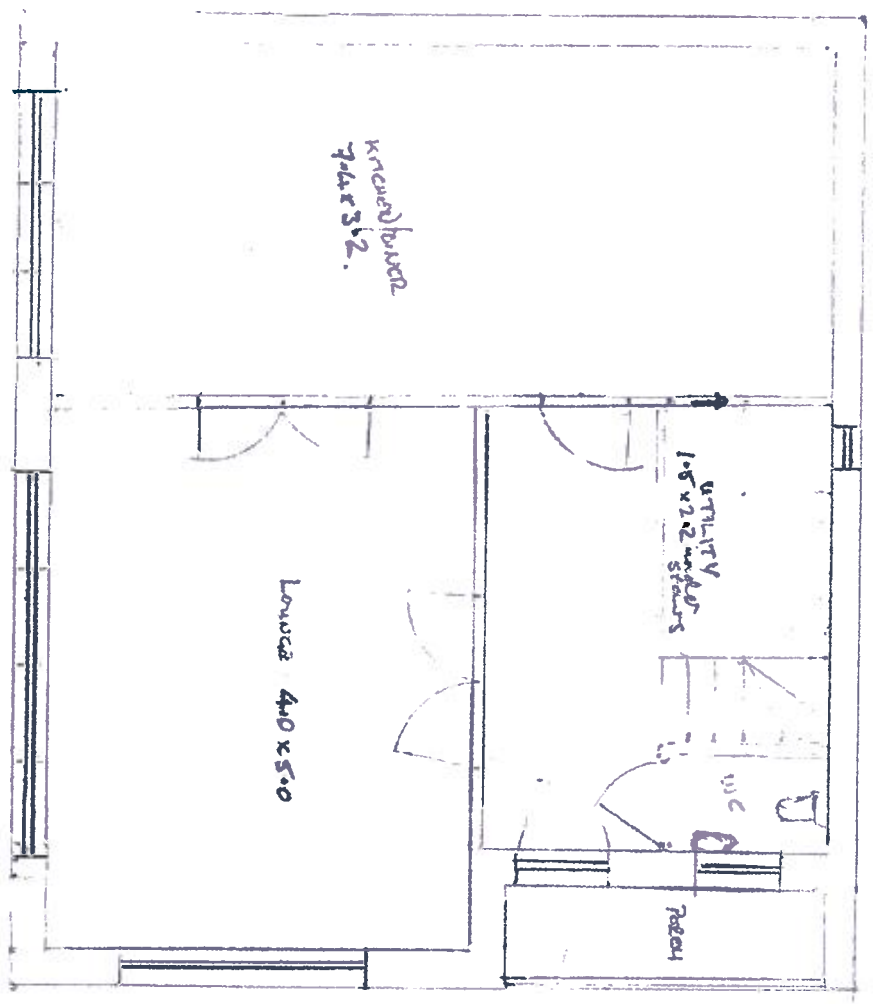


FRONT ELEVATION
(FLOOR & ANGLE 1/100)

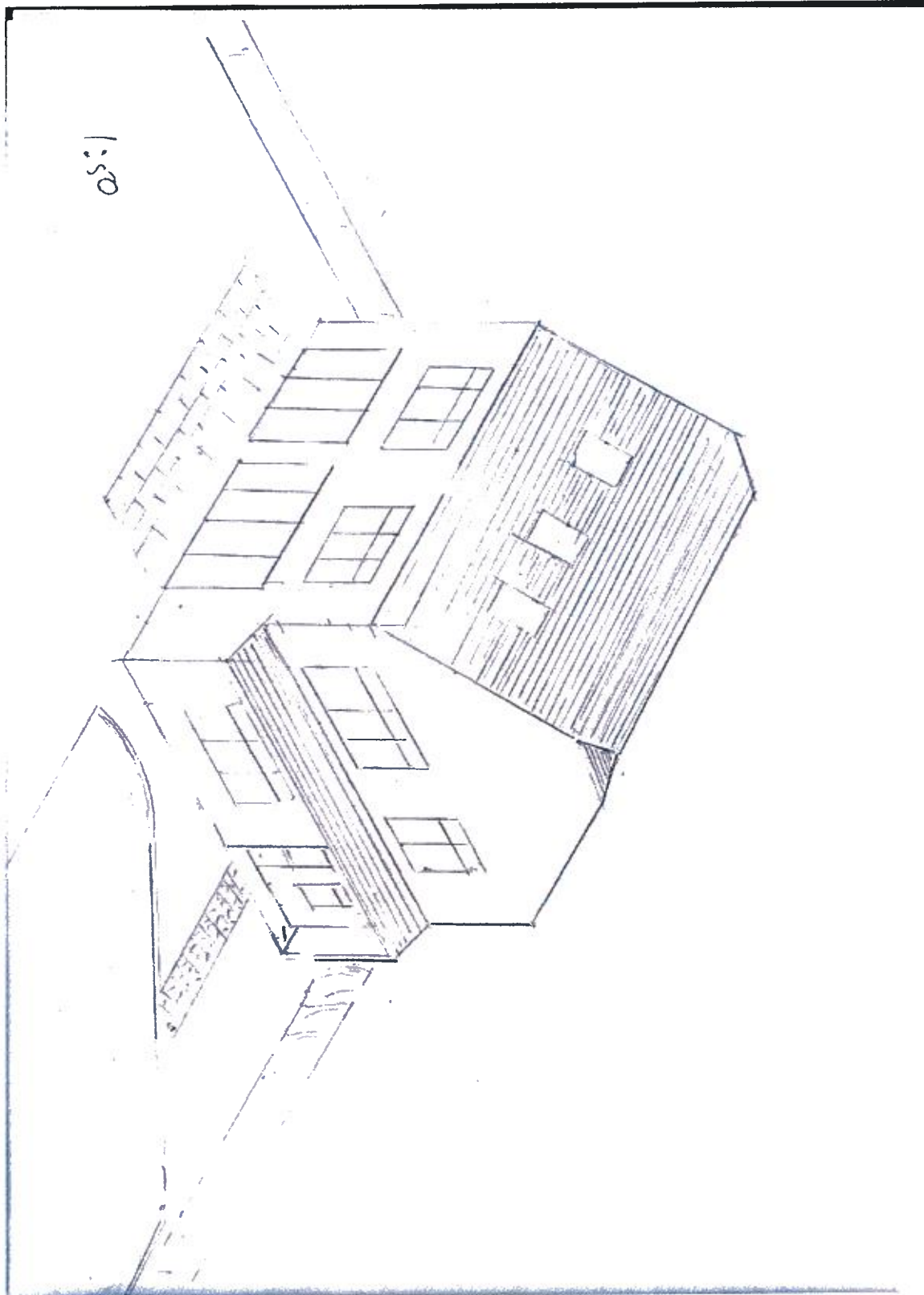


BACK ELEVATION
(FLOOR & ANGLE 1/100)

GROUND - Paved 6/11/5



1:50



1:50







Toc Architecture
12 Cambridge Road
Sandy
Beds
SG19 1JE

Planning Applications Team
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge

Tel: 01895 250230
Case Officer: Liz Arnold
Email: larnold@hillington.gov.uk
Date: 27th September 2016
Our Ref: 4913/PRC/2016/59

Dear Toc Architecture

RE: Conversion and extension of the existing 4 bedroom dwelling into two dwellings and the construction of a new 4 bedroom dwelling

SITE: 52 Field End Road Eastcote Pinner

I refer to your request for pre-application planning advice dated 29 March 2016 relating to the above development. The advice provided is based on the observations at the site visit and the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: OS01 - received 29 Mar 2016
01 - received 29 Mar 2016
PL01 - received 29 Mar 2016
PL02 - received 29 Mar 2016
PL03 - received 29 Mar 2016

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

The Site and Surrounds

The application site is located on the north western side of Field End Road and is bordered to the east and north by the Tudor Lodge Hotel and to the west and south by other residential properties. It comprises a two storey semi detached property with a detached garage to the side. Both this property and the adjoining property have been extended in a similar but not identical way in the past, with a two storey side extensions. The application site has a distinctive cat slide features between the two front gables, whilst the adjoining property has a front

projection. The neighbouring property also benefits from an additional two storey rear extension. To the front there is a gravelled driveway, which can accommodate at least 4 cars and to the rear there is a large L shaped rear garden.

The application site lies within the Developed Area as designated in the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

The Proposal

The proposal is for the extension and conversion of the existing dwelling to form 2 dwellings and demolition of the existing garage to create a driveway to the rear and the erection of a detached dwelling in the rear garden.

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon Local Plan: Part 1, Saved Unitary Development Plan policies, the London Plan 2016, the NPPF and supplementary planning guidance prepared by both LB Hillingdon and the GLA.

Part 1 Policies:

PT1.BE1 (2012) Built Environment

Other Policies:

AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
H12	Tandem development of backland in residential areas
H4	Mix of housing units
H7	Conversion of residential properties into a number of units
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
LPP 3.3	(2015) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2015) Quality and design of housing developments

LPP 3.8	(2015) Housing Choice
LPP 7.2	(2015) An inclusive environment
LPP 7.4	(2015) Local character
HDAS-EXT	Residential Extensions, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted December 2008
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006

Main Planning Issues

1. Principle of development

National Planning Policy Framework states there is a presumption in favour of sustainable development which is described for decision taking as "approving development proposals which accord with the development plan."

Policy H4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) states that wherever practicable a mix of housing units of different sizes should be provided including in particular, units of one or two bedrooms. Policy H7 advises that the Local Planning Authority will regard the conversion of residential properties into more units as acceptable in principle, provided this can be achieved without causing demonstrable harm to the residential amenities of the character of the area or the amenity of the adjoining occupiers and the following criteria are met: adequate sound insulation; car parking provision; all units and self contained and adequate amenity space is provided.

- New dwelling to rear

The London Plan (2016) provides guidance on how applications for development on garden land should be treated within the London Region. The thrust of the guidance is that back gardens can contribute to the objectives of a significant number of London Plan policies and these matters should be taken into account when considering the principle of such developments. Policy 3.5 of the London Plan supports development plan-led presumptions against development on back gardens where locally justified by a sound local evidence base.

The Mayor's Housing Supplementary Planning Guidance, March 2016 now provides further guidance on the interpretation of existing policies within the London Plan as regards garden development. Paragraph 1.2.44 advises that when considering proposals which involve the loss of gardens, regard should be taken of the degree to which gardens contribute to a communities' sense of place and quality of life (Policy 3.5), especially in outer London where gardens are often a key component of an area's character (Policies 2.6 and 2.7). The contribution gardens make towards biodiversity also needs to be considered (Policies 7.18 and 7.19) as does their role in mitigating flood risk (Policies 5.12 and 5.13). Gardens can also address the effects of climate change (Policies 5.9 - 5.11).

The NPPF (March 2012) at paragraph 53, this advises that LPAs 'should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'

The Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy BE1 advises that new development, in addition to achieving a high quality of design,

should enhance the local distinctiveness of the area, contribute to community cohesion and sense of place and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties. Specifically, the policy advises that development should not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase flood risk.

Within the Council's emerging Local Plan: Part 2 - Development Management Policies (Proposed Submission Version, September 2014), paragraph 4.16 advises that the Council, in general will not accept proposals for development on back garden land. Policy DMH6: Garden and Backland Development states:-

'There is a presumption against the loss of back gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases a limited scale of backland development may be acceptable, subject to the following criteria:

- rear garden land which contributes either individually or as part of a larger swathe of green space to the amenity of residents or provides wildlife habitats must be retained;
- neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
- vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;
- development on backland sites must be more intimate in mass and scale and lower than frontage properties;
- Features such as trees, shrubs and wildlife habitat, which are important to character, appearance or wildlife must be retained or re-provided.'

Furthermore, Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) Policy H12 advises that backland or tandem will only be permitted if no undue disturbance or loss of privacy is likely to be caused to adjoining occupiers.

Therefore the Council does not have an 'in principle' objection to the extension and subdivision of the building to provide 2 residential units and the erection of an additional residential unit to the rear, subject to the application demonstrating compliance with all of the above criteria and relevant Development Plan policies.

2. Design

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) requires all new development to maintain the quality of the built environment including providing high quality urban design. Furthermore Policies BE13 and BE15 of the Hillingdon Local Plan Part Two - Saved UDP Policies (November 2012) resist any development which would fail to harmonise with the existing street scene or would fail to safeguard the design of the existing and adjoining sites.

The application site is situated facing a curve in Field End Road. The two semi detached properties, although extended slightly differently have a balanced appearance. The proposed external alterations to the existing dwelling would consist of relocating the existing front door from the side of the central front projection to the front, which would match the neighbouring property. To the rear it is proposed to erect a single storey flat roofed extension infilling between the existing two storey projection and the boundary. It would measures 3.1m in depth matching the neighbouring extension, although the plans appear to indicate a height of 3.25m, which would be higher than the neighbouring extension and exceed HDAS guidance

of 3m. Therefore subject to minor amendments the proposed external alterations could be acceptable.

It is also proposed to erect a new two storey dwelling to the rear of the property. The garden area to the rear of the property covers approximately 365sqm, not including the garden area immediately to the rear of the existing dwelling. In terms of appearance a new dwelling in this location would be in part screened by the properties to the front although it would be visible from the street scene across the adjacent hotel's car park. It is noted that there is an existing two storey building to the rear of the site associated with the hotel, therefore the siting of a dwelling in this location would not be out of keeping with the urban grain of this location.

The proposed dwelling has been designed to complement the existing dwellings to the front, with a pitched gable ended roof and additional front facing gable projection and a high steeply sloping roof form over the single storey front projection reflecting the style of the cat slide detail to the front of the existing dwellings. However it is noted that the proposed dwelling has a height of 8.7m, which is considerably higher than the surrounding buildings. The dwelling to the front stand at 6.85m in height, the dwellings to the rear are approximately 8.2m, whilst the hotel a Grade II listed building) to the side has varying heights with the highest point on the gabled front projection at 8.4m, with the outbuilding immediately adjacent to the proposed dwelling significantly lower. It is therefore considered that due to the higher roof level the proposed dwelling would appear as a bulky and incongruous addition to the wider street scene, contrary to policies BE13 and BE15 of the UDP saved policies November 2012.

3. Amenity

Policy OE1, OE3 and BE24 of the Hillingdon Local Plan (November 2012) require the design of new developments to protect the amenity and privacy of neighbouring dwellings. Also the proposed development should not breach the 45 degree guideline when taken from the rear elevation of the neighbouring dwelling, ensuring no significant loss of light, loss of outlook or sense of dominance in accordance with Policy BE20 and BE21 of the Hillingdon Local Plan (November 2012).

Given the minimal alterations proposed to the existing dwelling it is not considered that the proposed extension and conversion to form two separate dwellings would have a significant impact on the neighbouring properties. The proposed new dwelling to the rear is situated in the northern corner of the rear garden set back 1m from the side boundaries. It has been orientated to face the new driveway and the highway beyond. The principle windows to most of the rooms however face south west over the proposed garden area. The properties on The Sigers beyond are situated approximately 23m away. Therefore it is not considered that a new dwelling would result in the loss of privacy to any of these properties. The rear elevation and other side elevation face the hotel and are blind except for two windows to the side facing the car park. These windows would serve the staircase and could be conditioned to be obscure glazed. The only other primary window serving the main bedroom is in the front elevation and faces towards no. 52 and its rear amenity space. This would be situated just 15m away.

now 16m

Therefore it is considered that the proposal would result in a loss of amenity through a loss of privacy to the neighbouring property. As such, the proposal fails to comply with the requirement of policies BE20 and BE21 of the adopted Hillingdon Unitary Development Plan (Saved Policies, November 2012). It is noted that there is a very

small secondary window to this room facing the garden and it may be that this window should be increased in size to form the primary window, allowing the front facing window to be obscure glazed, which may address this concern.

Policy H12 advises that tandem developments with one house behind another and sharing an access as generally unacceptable because of the difficulties of access to the house at the back and the disturbance and lack of privacy suffered by the house to the front. Access to the new property is proposed with a driveway involving the removal of the existing garage to the side of no.52. This has the potential to lead to noise nuisance with cars and people accessing the property alongside the existing dwelling. However, given that the car park of the adjacent hotel is situated immediately adjacent to the site, with careful design it may be possible to mitigate the potential impact.

- Internal Floorspace

On 25 March 2015, the Government introduced new technical housing standards in England, which comprise of new additional 'optional' Building Regulations on water and access, and a nationally described space standard (referred to as "the new national technical standards"). These new standards came into effect on 1 October 2015. The Mayor of London has adopted the new national technical standards through a minor alteration to The London Plan.

The Housing Standards (Minor Alterations to the London Plan) March 2016 sets out the minimum internal floor spaces required for developments in order to ensure that there is an adequate level of amenity for existing and future occupants. The standards require a 2 bedroom (2 person) property to have a minimum internal floor area of 70sqm with an additional 2sqm of internal storage; a 1 bed (2 person) property to have a minimum internal floor area of 58sqm with an additional 1.5sqm of internal storage and a 4 bed (6 person) property to have a minimum floor area of 112sqm plus 3sqm of storage. The proposed layouts indicate the 2 bed property has a floor area of approximately 88sqm, the 1 bed property has a floor area of approximately 58sqm and the 4 bed property has a floor area of approximately 144sqm and would comply with the required standard resulting in a satisfactory residential environment for future occupiers, in compliance with Policy 3.5 and Table 3.3 of the London Plan and Policy BE19 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

- External Amenity Space

Policy BE23 of the Hillingdon Local Plan requires external amenity space "which is sufficient to protect the amenity of the occupants of the proposed and surrounding buildings, and which is useable in terms of its shape and siting."

Paragraph 4.19 of HDAS Residential Layouts states that developments should incorporate usable, attractively laid out and conveniently located garden space in relation to the properties they serve. For a 1 bed property there is a requirement for a minimum of 40sqm; for a 2 bed property there is a requirement for a minimum of 60sq.m and for a 4/5 bed property, 100sq.m. Plot 1 (2 bed) there is a private amenity area of 61sqm; for plot 2 (1 bed) there is an amenity area of 40sqm and for the 4 bed property there is an amenity area of 182 sqm. Therefore there is sufficient garden area to provide adequate amenity space for both dwellings.

4. Highways

- Car Parking

The proposed plans show two parking spaces for plot 1; one parking space for plot 2 and two parking spaces for plot 3. The proposals therefore indicate adequate parking provision can be provided.

However, the submitted site plan advises plots 1 and 2 would use the existing crossover and a new crossover would be created for the new driveway. However the detailing in the plan is not clear and it appears to show as an enlargement of the existing crossover to cover both accesses. This would be unacceptable. The width of a standard crossing is 2.5 metres at the back of the public footway. This increases to 4.6 metres at the kerbline. An excessively wide crossover would create a hazard for pedestrians, particularly children and elderly. Any new crossover would need to be separate from the existing to provide adequate refuge between them. It is, therefore, considered that the proposed crossover would be detrimental to highway and pedestrian safety, contrary to Policies AM7 and AM14, of Part 2, of the Hillingdon Local Plan 2012.

- Cycle Parking

The proposal makes no provision cycle storage provision. However, there is more than sufficient space to provide suitable storage.

- Refuse and Recycling

Policy 5.17 of the London Plan sets out the Mayor's Spatial Policy for Waste Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. No details have been provided, but there is sufficient space and access to provide these facilities.

5. Other

- Access

The London Borough of Hillingdon is committed to achieving the highest standards of access and inclusion. All housing development schemes must be constructed in accordance with the minimum requirement of M4(2) of the building regulations Lifetime Homes Standards as outlined in Policy 3.8 of the London Plan 2016.

- Flood Risk

In accordance with Policy EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), the principles of sustainable drainage should be used in any development of this site which should seek to manage storm water as close to its source as possible.

- Security

The design and layout should also have regard to secure by design principles.

- Energy

The Local Planning Authority expects the design of developments to take into account the requirements of energy conservation. Applicants are advised to consult the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction (available at www.london.gov.uk/thelondonplan/guides/spg/spg_04.jsp) to assist in achieving a sustainable development.

6. Planning Obligation and CIL (Mayor and LBH)

The proposal would create a net gain of 1 new residential unit. The London Borough of Hillingdon falls within Charging Zone 2 of the Mayoral CIL which requires a flat rate fee of £35 per square metre (plus indexation) for each net additional square metre added to the site as part of the development.

The proposal would also be liable under the London Borough of Hillingdon's Community Infrastructure Levy (CIL), which was introduced in August 2014. The charging schedule requires a fee of £95 per square metre for residential developments.

Should you require further information please refer to the Council's Website www.hillingdon.gov.uk/index.jsp?articleid=24738

7. Application Submission

List of documents to be submitted

Application Form
CIL Form
Location Plan
Existing Site Plan
Existing Floor Plans
Existing Elevations
Proposed Site Plan
Proposed Floor Plans
Proposed Elevations
Planning Statement
Design and Access Statement (including details of Crime Prevention and Accessibility)
Hard and Soft Landscaping proposals
Energy Assessment/Strategy
Tree Survey with Arboricultural Impact Assessment including levels, tree protection plan and Arboricultural method Statement.
Evidence to record the existing property with Historic England Recording Level 1, because of its links with RAF Uxbridge.

Please note that this list is not exhaustive and other information may be required on the proposals program.

8. Conclusion

The proposal is for the demolition of existing garage, the extension and conversion of the existing dwelling to provide 2 dwellings and the erection of a new dwelling to the rear. There is no objection in principle to the redevelopment of the site for residential use. However the proposed dwelling by virtue of its height would be a prominent and incongruous addition to the wider street scene. Also given the close proximity to the original dwelling the provision of a first floor window to a habitable

room, overlooking the gardens and rear windows of no. 52 would result in the loss of privacy to that dwelling. The Highway drawings submitted are not clear and any additional crossover would need to comply with the standards identified and provide suitable refuge between.

The plans do need to ensure they follow the guidelines within the latest Government guidance as well as the the relevant policies and guidance contained within the local plan, the adopted supplementary guidance and the London plan (2015).

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

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

**Liz Arnold
Planning Consultant
Major Applications Team
London Borough of Hillingdon**

Planning Guarantee

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

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

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

Appendix 2

List Entry for Field End Lodge (Tudor Lodge Hotel)



FIELD END LODGE

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: FIELD END LODGE

List entry Number: 1358348

Location

FIELD END LODGE, 50, FIELD END ROAD

The building may lie within the boundary of more than one authority.

County: Greater London Authority

District: Hillingdon

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 24-Jan-1950

Date of most recent amendment: Not applicable to this List entry.

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 202750

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

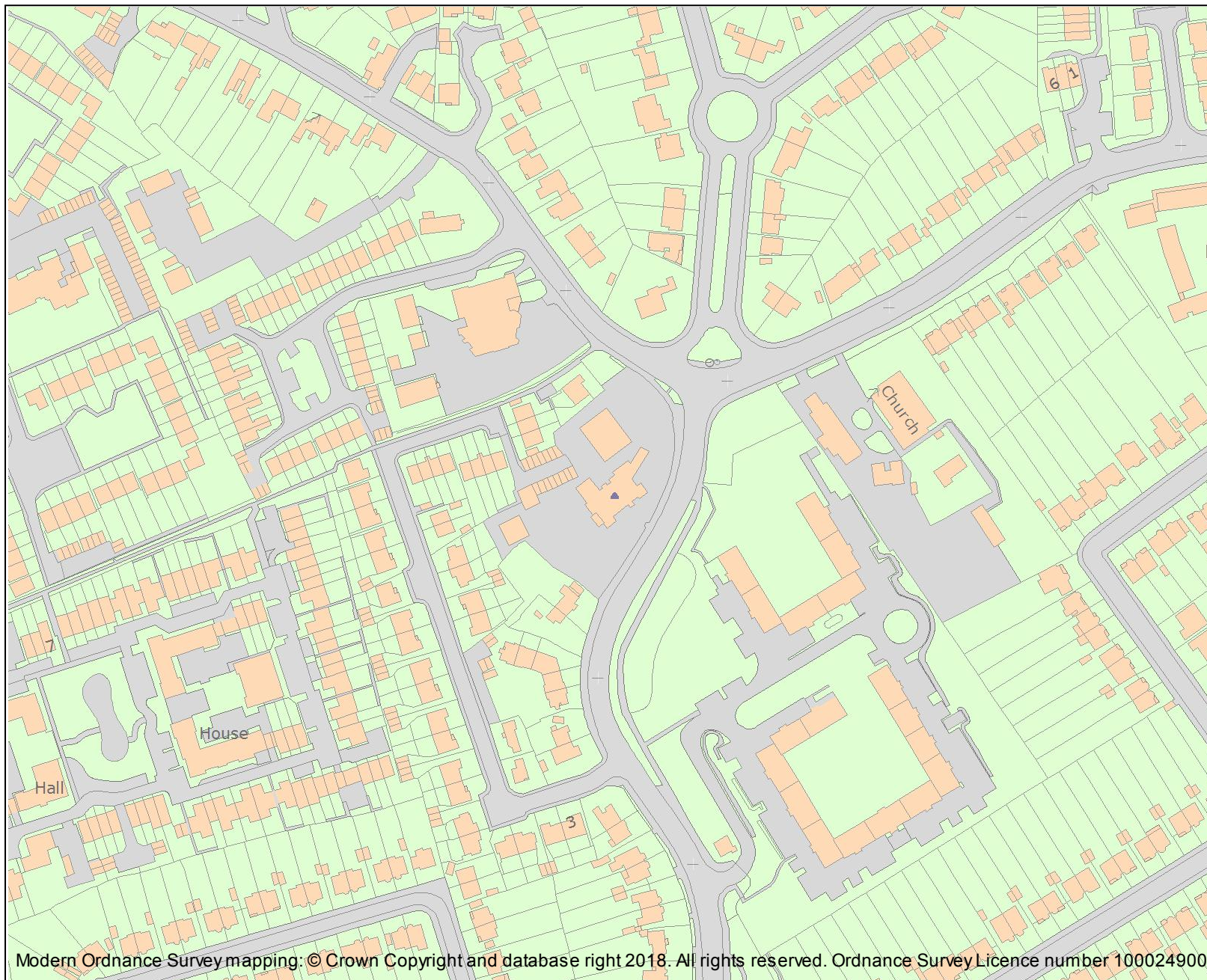
History

Legacy Record - This information may be included in the List Entry Details.

Details

1. 5018 FIELD END ROAD (West Side) EASTCOTE No 50 (Field End Lodge) TQ 1088 10/111 24.1.50. II 2. C16. L-shaped timber frame and plaster house. L plan filled in by C17 painted brick rectangular addition. 2 storeys, 4 modern 2-light casements. Modern "Tudor" porch. 2 gables oversailing at 1st floor level on brackets; south gable has modern fascia board, east gable exposed corbels. Modern north-east addition. Interior shows much exposed timber including swell-head posts, heavy ties, side purlin roof with wind braces and round-headed doors, with pegged spandrels, on upper floor.

Listing NGR: TQ1089288358



Modern Ordnance Survey mapping: © Crown Copyright and database right 2018. All rights reserved. Ordnance Survey Licence number 100024900.

This is an A4 sized map and should be printed full size at A4 with no page scaling set.

Heritage Category:	Listing
List Entry No :	1358348
Grade:	II

County: Greater London Authority

District: Hillingdon

Parish: Non Civil Parish

For all entries pre-dating 4 April 2011 maps and national grid references do not form part of the official record of a listed building. In such cases the map here and the national grid reference are generated from the list entry in the official record and added later to aid identification of the principal listed building or buildings.

For all list entries made on or after 4 April 2011 the map here and the national grid reference do form part of the official record. In such cases the map and the national grid reference are to aid identification of the principal listed building or buildings only and must be read in conjunction with other information in the record.

Any object or structure fixed to the principal building or buildings and any object or structure within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July, 1948 is by law to be treated as part of the listed building.

This map was delivered electronically and when printed may not be to scale and may be subject to distortions.

List Entry NGR:	TQ 10892 88358
Map Scale:	1:2500
Print Date:	9 February 2018

Name: FIELD END LODGE

Appendix 3

Extracts from Policy not referred to by LBH

(Policy 2.6 London Plan and London SPD 1.2.44-5, Policy H2 Draft London Plan)

MAYOR OF LONDON



THE LONDON PLAN

**THE SPATIAL DEVELOPMENT STRATEGY FOR LONDON
CONSOLIDATED WITH ALTERATIONS SINCE 2011**

MARCH 2016

characteristics and vice versa.

- 2.23 The policies set out here will both contribute towards a more balanced and genuinely polycentric pattern of development in London and help address pressures on the transport network into central London caused by the imbalance between where people live and where they work.

POLICY 2.6 OUTER LONDON: VISION AND STRATEGY

Strategic

- A The Mayor will, and boroughs and other stakeholders should, work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches through LDFs and other development frameworks to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements.
- B The Mayor will, and boroughs and other stakeholders should, enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole. The significant differences in the nature and quality of outer London's neighbourhoods must be recognised and improvement initiatives should address these sensitively in light of local circumstances, drawing on strategic support where necessary.
- 2.29 The Commission demonstrated that if outer London is to achieve its full potential, it is essential to consider questions of economic development, transport and other infrastructure and quality of life together. A good environment, adequate housing of the right type and a high quality of life are important to the kinds of economic activity outer London needs to be able to attract, while economic development is in turn vital to achieving these wider objectives. A joined up approach to 'place shaping' will be essential, fostering mixed use development and locally-based action to enhance the quality of places, provision of social infrastructure and sustainability of neighbourhoods. At a strategic level, the Mayor will coordinate his strategies as they affect outer London so that investment by the GLA Group and other agencies realises the maximum benefit.
- 2.30 The policies and proposals in the Mayor's Transport Strategy (MTS paragraph 103) reflects the Outer London Commission's proposal that town centres should be the focus of transport investment. Policy 6 in the MTS states that the Mayor, through TfL and working with the Department for Transport, Network Rail, train operating companies and other transport stakeholders, will seek to provide appropriate connectivity and capacity on radial transport corridors into current and potential metropolitan town centres (see Chapter 4 of this Plan) and strategic outer London development centres (see Policy 2.15 and Annex 2 of this Plan). MTS Policy 7 deals with improving orbital connectivity in outer London, particularly between adjacent
-

metropolitan town centres, where shown to be value for money. MTS Policy 8 states that the Mayor, through TfL, will work with a range of transport stakeholders to support a range of transport improvements within metropolitan town centres for people and freight that help improve connectivity and promote the viability of town centres, and that provide enhanced travel facilities for pedestrians and cyclists. Each of these policies is being taken forward by a range of MTS detailed proposals. Similarly, Action 5B of the Mayor's Economic Development Strategy states that the Mayor will work with boroughs, developers and other partners to direct investment into existing major employment areas (including town centres) and the strategic outer London development centres.

- 2.31 A generally high quality of life is one of outer London's major assets. Maintaining this where it exists, and enhancing it where necessary, will be key to the area's future success – a high quality environment, and providing places where people will want to work and live, will be important to attracting and retaining the kind of economic sectors which may lift growth in outer London. Important elements of this will include ensuring high quality 'lifetime' neighbourhoods with sufficient, good quality social infrastructure provision and harnessing the benefits of growth to enhance residential quality and amenity. Good quality design will be essential and must respond sensitively to local context, including drawing on traditional suburban 'rus in urbe' themes as well as more modern 'urban renaissance' principles depending on local circumstances. This is likely to require the application of the general quality of life principles outlined in this Plan (see paragraphs 1.44, 1.56 and 1.57) to the particular circumstances of different places in outer London, recognising the positive contribution of existing, lower density housing in lower PTAL areas to London's overall economic and residential 'offer'.
- 2.32 Outer London has important strategic functions as a place to live, and it will be important to ensure the area continues to provide a range of homes in sufficient numbers to support its own economic success, and that of inner and central London. This can also help reduce the need for long distance commuting and carbon emissions.

POLICY 2.7 OUTER LONDON: ECONOMY

Strategic

- A The Mayor will, and boroughs and other stakeholders should, seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by:
- a enabling existing sources of growth to perform more effectively, and increasing the competitive attractiveness of outer London for new sectors or those with the potential for step changes in output
 - b identifying, developing and enhancing capacity to support both viable local activities and those with a wider than sub-regional offer, including strategic outer London development centres (see

Policy H2 Small sites

H2

- A. Small sites should play a much greater role in housing delivery and boroughs should proactively support well-designed new homes on small sites through both planning decisions and plan-making in order to:
 - 1. significantly increase the contribution of small sites to meeting London's housing needs
 - 2. diversify the sources, locations, type and mix of housing supply
 - 3. support small and medium-sized housebuilders
 - 4. support those wishing to bring forward custom, self-build and community-led housing.
- B. Boroughs should:
 - 1. recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments
 - 2. prepare area-wide design codes to promote good design and to proactively encourage increased housing provision and higher residential densities on small housing developments. Design codes should provide clear guidelines and parameters for small housing developments and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.
- C. Boroughs should increase planning certainty on small sites by:
 - 1. identifying and allocating appropriate small sites for residential development
 - 2. listing these sites on their brownfield registers
 - 3. granting permission in principle on specific sites or preparing local development orders.
- D. To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:
 - 1. infill development on vacant or underused sites
 - 2. proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through:
 - a. residential conversions
 - b. residential extensions
 - c. the demolition and redevelopment of existing buildings
 - d. infill development within the curtilage of a house
 - 3. the redevelopment or upward extension of flats and non-residential buildings to provide additional housing.
- E. For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments which are in accordance with a design code developed in accordance with part B. Where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.
- F. The presumption in favour of small housing developments should not be applied to:
 - 1. statutory listed buildings
 - 2. developments providing more than 25 homes
 - 3. proposals that do not provide net additional housing
 - 4. sites of more than 0.25 hectares in size
 - 5. non-self contained housing schemes
 - 6. mixed-use proposals within the Central Activities Zone (CAZ)

7. estate regeneration schemes.
- G. New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should meet M4(2) standard for 'accessible and adaptable dwellings' and provide step-free access. New build homes on these sized sites that are not on the ground floor do not need to meet M4(2) standards and can comply with the M4(1) standard, which does not require step-free access.
- H. Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development.

[Comment on this section](#)

4.2.1

For London to meet its housing needs, **small housing developments** of between one and 25 homes must make a **substantially greater contribution** to new supply across the city. Therefore, increasing the rate of housing delivery from small housing sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.

[Comment on this section](#)

4.2.2

Increasing housing output of this scale can also help to support a number of **related housing and planning policy objectives**. This includes:

- reviving the role of small and medium-sized developers in delivering new homes in London
- diversifying the sources, locations, type and mix of housing supply and the type of sites available in addition to large brownfield sites
- increasing housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets
- providing opportunities for custom-build housing and community-led housing projects[38]
- supporting town centre economies
- as with large sites, providing opportunities to support the use of modern methods of construction.

[38] See Glossary

[Comment on this section](#)

4.2.3

The **one to 25-unit threshold** set out in Policy H2 Small sites which triggers the application of this policy is considered to be representative of small housing developments across London and for this reason differs from that used in Planning Practice Guidance[39] and the definition of 'major development' in planning legislation[40].

[39] DCLG, Planning Practice Guidance, Planning obligations, Paragraph: 031 Reference ID: 23b-031-20161116

[40] The Town and Country Planning (Development Management Procedure) (England) Order 2010, Article 2

[Comment on this section](#)

4.2.4

The **small sites targets** in Table 4.2 are informed by the 2017 London SHLAA and show the potential capacity for additional housing on sites of less than 0.25 hectares in size. The targets are based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints. The small sites targets are a component of, and not additional to, the overall housing targets.

[Comment on this section](#)

4.2.5

Incremental intensification of existing residential areas within PTALs 3-6 and within 800m of a Tube station, rail station or town centre boundary is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. This can take a number of forms including new build, infill development, conversions, demolition and redevelopment or extension of existing buildings, where this results in net additional housing provision. Within these areas, there is a need for the character of some neighbourhoods to evolve to accommodate additional housing. Therefore, the emphasis of decision-making should change from preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London's needs.

[Comment on this section](#)

4.2.6

The Mayor will set out **design principles** for small housing developments across London as part of his review of GLA design guidance, which boroughs should draw on and supplement when preparing design codes. Design codes can be combined with local development orders, where appropriate.

[Comment on this section](#)

4.2.7

Special attention will be required within **conservation areas** to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.

[Comment on this section](#)

Table 4.2

10 year targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size)

Planning Authority	Ten-year housing target	Annualised average
Barking & Dagenham	5,190	519
Barnet	12,040	1204
Bexley	8,650	865
Brent	10,230	1023
Bromley	10,290	1029
Camden	3,760	376
City of London	740	74
Croydon	15,110	1511
Ealing	10,740	1074
Enfield	9,830	983
Greenwich	6,810	681
Hackney	6,600	660
Hammersmith & Fulham	2,980	298
Haringey	6,260	626
Harrow	9,650	965
Havering	9,040	904
Hillingdon	7,650	765
Hounslow	6,800	680
Islington	4,840	484
Kensington & Chelsea	1,690	169
Kingston	6,250	625
Lambeth	6,540	654
Lewisham	8,290	829
London Legacy Development Corporation	800	80
Merton	6,710	671
Newham	9,500	950
Old Oak Park Royal Development Corporation	60	6
Redbridge	9,380	938
Richmond	6,340	634
Southwark	8,000	800
Sutton	7,380	738
Tower Hamlets	5,660	566
Waltham Forest	8,890	889
Wandsworth	7,740	774
Westminster	5,290	529
Total	245,730	24,573

Open table in full window

[Comment on this section](#)

4.2.8

Small housing developments are envisaged to be within close proximity to existing homes. These should be carefully and creatively designed to avoid an unacceptable level of harm to the amenity of surrounding properties in relation to privacy, for example through the placement and design of windows and the use of landscaping. Environmental and architectural innovation should be supported and schemes should achieve **good design** and ensure that existing and proposed homes benefit from satisfactory levels of daylight and sunlight. All homes must meet the housing standards in Policy D4 Housing quality and standards, including the provision of private open space.

[Comment on this section](#)

4.2.9

Loss of existing biodiversity or **green space**, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates.

[Comment on this section](#)

4.2.10

Small sites can be particularly suitable for well-designed **community-led housing**^[41] projects. Boroughs should support such projects where these developments are integrated with existing neighbourhoods and support mixed and inclusive communities.

^[41] See Glossary

[Comment on this section](#)

4.2.11

Where the amalgamation of separate flats into larger homes is leading to the sustained loss of homes and is not meeting the identified requirements of large families, boroughs are encouraged to resist this process.

[Comment on this section](#)

4.2.12

As demonstrated by the 2017 SHMA, London has significant unmet need for **affordable housing**. For some boroughs, sites of ten or fewer units are the main source of supply and play an important role in contributing to affordable housing delivery, often via cash in lieu contributions which are then used as part of borough-wide affordable housing programmes. Given the important role these sites play, the Mayor believes that boroughs should be capable of securing cash in lieu contributions for affordable housing contributions from such sites. Therefore, boroughs are encouraged to include policies requiring affordable housing from such sites of ten or fewer units in their Development Plans.

[Comment on this section](#)

Figure 4.3

Proximity to town centres



Proximity to Town Centres Walking distance

- 800m distance to a London Underground Station
- 800m distance to a Town Centre

Source: Transport for London (TfL)

Contains OS data © Crown copyright and database right (2017)

[Comment on this section](#)

4.2.13

For practical reasons associated with on-site provision of a small number of affordable units (such as management), contributions on sites delivering ten or fewer units should be asked for as a **cash in lieu contribution**. Boroughs should have an identified programme through which additional affordable homes will be delivered. Flexibility should be allowed in the timing of payments in recognition of the distinct economics of small and medium-sized housebuilders and to reduce their up-front costs.

[Comment](#)



HOUSING SUPPLEMENTARY PLANNING GUIDANCE

MARCH 2016

UPDATED AUGUST 2017 - See Homes for Londoners SPG

LONDON PLAN 2016

IMPLEMENTATION FRAMEWORK

exemptions will have until May 2019 to adopt Article 4 Directions in order to continue to operate exemptions from this point onwards.

Private garden land development

1.2.44 London Plan Policy 3.5 A states that 'Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.' This locally sensitive approach reflects paragraph 53 of the NPPF. Where planning permission is required, boroughs are advised to consider proposals for development in gardens in the light of local circumstances, taking into account the value gardens have in addressing the range of strategic policy objectives, particularly in terms of:

- defining local context and character including local social, physical, cultural (Policy 7.4, 3.5);
- providing safe, secure and sustainable environments and play spaces for children (Policy 3.6);
- supporting biodiversity, protecting London's trees, 'green corridors and networks' (Policies 7.19, 7.21);
- flood risk management and sustainable drainage (Policies 5.12 and 5.13)
- mitigating the effects of climate change including the 'heat island' effect and urban greening (Policies 5.1, 5.9, 5.10); and
- enhancing the distinct character of suburban London (Policy 2.6).

1.2.45 Boroughs should seek to strike an appropriate balance between these and other London Plan policies, in particular the strategic objective to provide a wide choice of homes Londoners can afford, including family sized units, taking account of the specific needs of large families (Policy 3.8). Alongside new build provision and turnover within the existing housing stock, extensions to existing homes and the sensitive renewal and intensification of existing residential areas is likely to play an important role in meeting demand for larger properties in the capital, helping to address overcrowding and affordability issues in certain areas.

Basement extensions

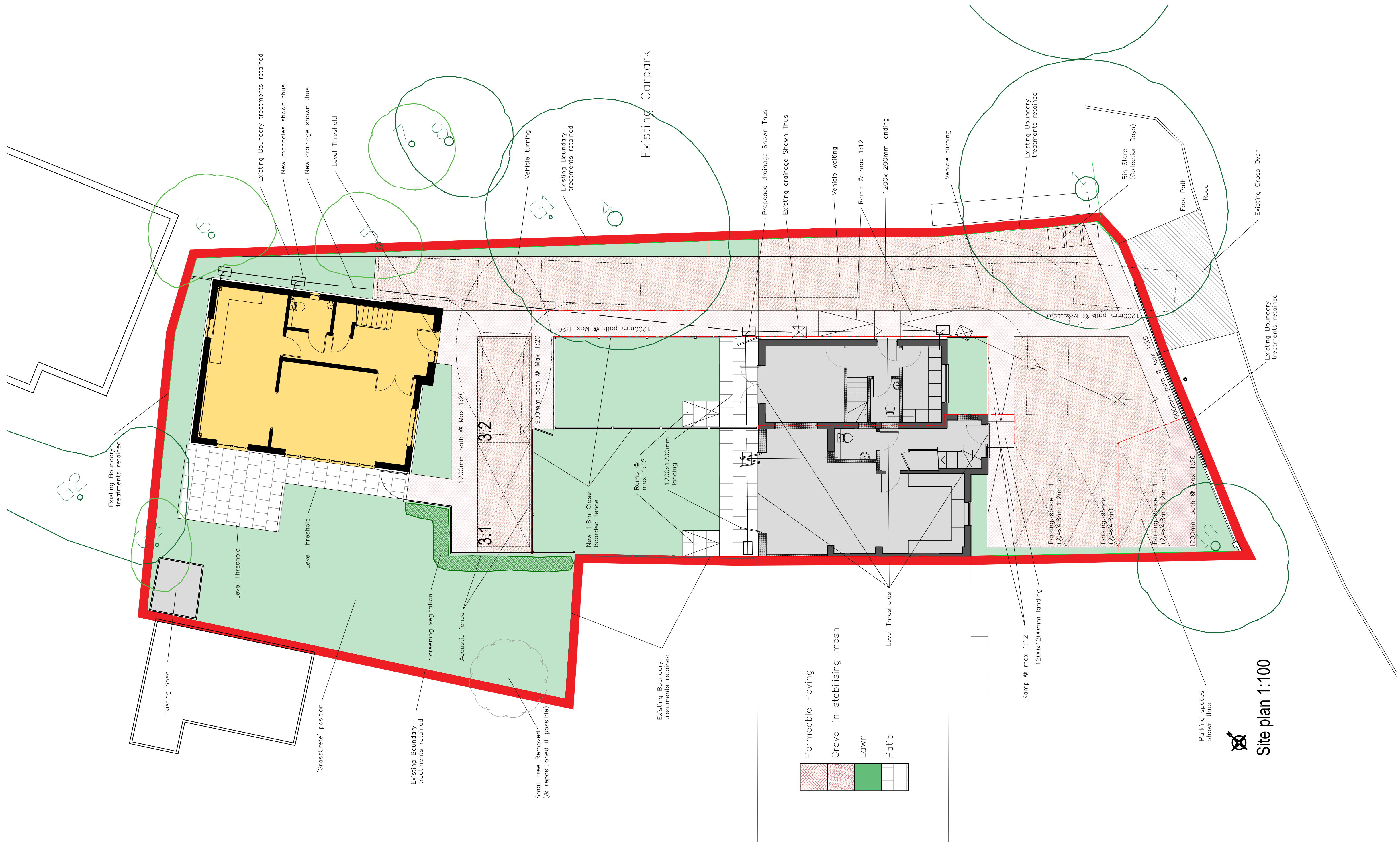
1.2.46 Paragraph 3.33 of the London Plan outlines the range of London Plan policies which should be taken into account when considering planning applications for basement development. Where subterranean extensions to existing dwellings pose planning policy (as opposed to enforcement/regulation) issues, boroughs are advised to consider the bearing of such development on London Plan policies addressing sustainable design and construction (5.3), retrofitting (5.4), overheating and cooling (5.9), flood risk (5.12), sustainable drainage (5.13), construction and demolition waste (5.18), water use and supplies (5.15), trees (7.12) and biodiversity (7.119). The Sustainable Design and Construction SPG outlines a range of issues and potential mitigation measures to consider in relation to basement development. This includes ground/surface water flooding,

Appendix 4

Revised parking options plans:

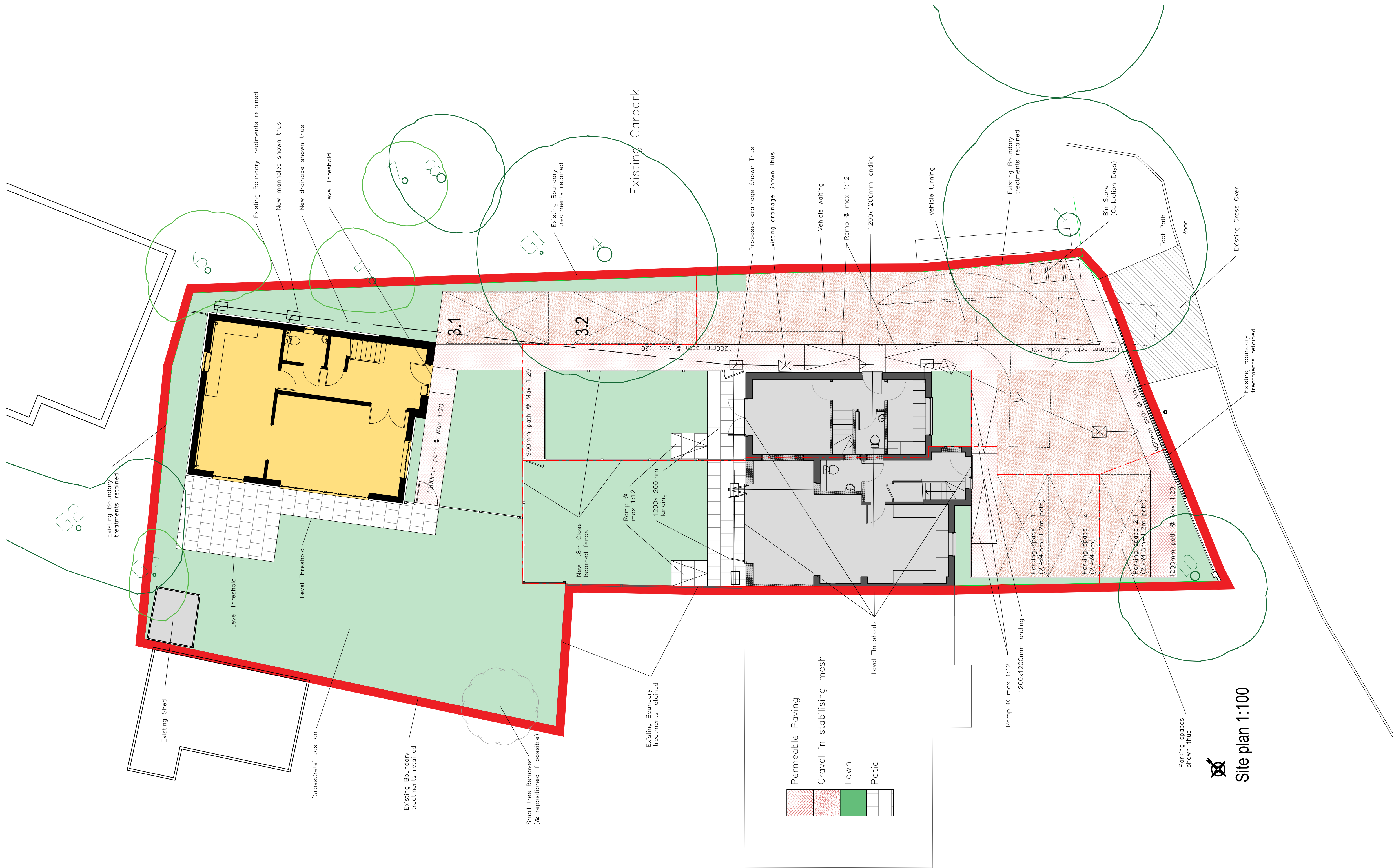
1610 PL12

1610 PL13



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