



Mr M Dempsey
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Our Ref: 25767/PRC/2020/16

Dear Mr M Dempsey

RE: Demolition of existing house and erection of a four storey building, with basement, to provide 7 x 2 bed and 2 x 3 bed self-contained flats

SITE: 72 Harefield Road Uxbridge

I refer to your request for pre-application planning advice dated 23 January 2020 and our subsequent meeting on 11 March 2020 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: Design and Access Statement - received 23 Jan 2020
190603-P-10 - received 23 Jan 2020
Tree schedule - received 23 Jan 2020
Location Plan (1:1250) - received 23 Jan 2020
19-01-01-Rev. C - received 23 Jan 2020
19-01-02 Rev. C - received 23 Jan 2020
19-01-03 Rev. C - received 23 Jan 2020
19-01-04 Rev. C - received 23 Jan 2020
19-01-05 Rev. B - received 23 Jan 2020
19-01-11 Rev. A - received 23 Jan 2020

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

This site is occupied by a two-storey house within an established garden which is set back from Harefield Road on the east side, opposite Fairlight Drive. The land slopes up from the road towards the east, and the house is located in an elevated position. The side and rear boundaries are tree-lined. There are no TPO's or Conservation Area designations affecting the site.

The Proposal

The application seeks permission for the demolition of existing house and erection of a four storey building, with basement, to provide 7 x 2 bed and 2 x 3 bed self-contained flats

Planning Policy

The proposed development would be assessed against the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance:

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.H1	(2012) Housing Growth

Other Policies:

DMH 4	Residential Conversions and Redevelopment
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHD 3	Basement Development
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.8	(2016) Housing Choice
LPP 7.4	(2016) Local character
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places

Main Planning Issues

1. Principle of development

The NPPF has a requirement to encourage the effective use of land by re-using land. This is an existing residential unit set in a spacious plot. The site lies within an established residential area where there would be no objection in principle to the intensification of the residential use of the site, subject to all other material planning considerations being acceptable, in accordance with policies outlined in the Hillingdon Local Plan (November 2012).

Policy DMH 2 of the Local Plan: Part Two - Development Management Policies (2020) advises the Council will require the provision of a mix of housing units of different sizes to reflect the latest information on housing need.

Policy DMH 4 advises residential conversions and redevelopment of dwellings into new blocks of flats will only be permitted where:

- i) it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped;
- ii) on streets longer than 1km the proposed development should be taken as the midpoint of a 1km length of road for assessment purposes.

In consideration of Policy DMH 4 the supporting text advises the redevelopment of dwellings into new blocks of flats can enable more effective use of sites to be achieved. However this type of development must seek to enhance local character of the area. Previously large concentrations of flats have resulted in a range of problems, including increased on-street parking, loss of front gardens, reduction in privacy, significant changes to the street scene and loss of family accommodation. It is noted that less than 10% of properties within Harefield Road have been converted.

2. Design

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) states that all new developments should achieve a high quality of design in all new buildings and the public realm contributes to community cohesion and a sense of place. The NPPF also notes the importance of achieving design which is appropriate to its context stating that 'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

Policy DMHB 5 of the Local Plan: Part Two - Development Management Policies (2020) advises that within Areas of Special Local Character new development should reflect the character of the area and its original layout. Alterations should respect the established scale, building lines, height, design and materials of the area.

Policy DMHB 11 advises that all development will be required to be designed to the highest standards and incorporate principles of good design. It should take into account aspects including the scale of the development considering the height, mass and bulk of adjacent structures; building plot sizes and established street patterns; building lines and streetscape rhythm and landscaping.

Policy DMHB 12 advises that development should be well integrated with the surrounding area. It should ensure public realm design takes account of the established townscape character and quality of the surrounding area.

The proposal includes the demolition of the existing detached two storey dwelling and the erection of a 4 storey building containing 7 x 2 bed and 2 x 3 bed flats. The submitted plans indicate that the building would be built into the rising site to include a lower ground floor. The building would have a ridge height similar to adjacent semis at numbers 74 and 76 Harefield Road. The building would have a depth of 21.3m plus balconies x 16m in width. The design of the building picks up cues from the design of the adjacent semis with bay windows and fenestration. The proposal has a single vehicular access serving two frontage parking space with access under the building to a rear parking area towards the rear with 10 parking spaces at the rear.

The existing house has a relatively verdant character with a number of trees within and adjacent to the site which are of amenity value. The existing dwelling is not considered to be of sufficient value to resist its loss. It will however be important to ensure that any replacement building is of a suitable scale and design which fits into the streetscene. The proposed built form would extend across much of the width of the site for its full height. It would result in narrow gaps (1.5m) along the sites boundaries resulting in the built form having a greater impact on neighbouring sites and general sense of openness. The applicant advised at the meeting that he would explore an increase in separation to the boundary with Number 74 which was more prominent in the street scene.

Concerns are raised in terms of the conflicting roof forms, especially the rear roofs which would be at odds with the frontage roof form, resulting in an incongruous addition to the street scene.

At the meeting the applicant discussed the roof form of the rearwards projection. The argument advanced was that the rear elevation would not be particularly visible. It is however considered that views of the roof of the proposed building would be visible from public viewpoints and it would be necessary to consider a roof form that better respects that of the frontage element. This may involve a reduction in the scale and width of the building to allow for a steeper roof pitch which would be more sympathetic. The applicant also advised that a crown roof may be explored.

3. Amenity

Policy DMHB 11 of the Local Plan: Part Two - Development Management Policies (2020) advises that all development will be required to be designed to the highest standards and incorporate principles of good design. It should also not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties or onto private open spaces. A minimum of 21m separation distance between windows of habitable rooms will be required to maintain privacy. The Council will also expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook.

Policy DMHB 16 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

Although the proposal would not appear to contravene a 45 degree line of sight from the rear windows, the increased bulk of the proposal extending so significantly beyond the rear of the neighbouring building at an increased height would result in a significant sense of enclosure and overdominance. The adjacent flats to the south are sited 2.2m off the boundary with the application site. The proposed building would project over 11m to the rear of these flats (including balconies) which would be considered to have an unacceptably dominating impact. Number 74 Harefield Road has 4 windows in its flank elevation of the outrigger to the rear, two at ground floor level and two at first floor level. These windows appear to be clear glazed and would be sited 8m away from the rearward projecting part of the proposed building which would result in an unacceptably dominating form of development. At the meeting the applicant advised that he would explore the issue of outlook and light. It was suggested that a 15m separation distance would be appropriate to windows serving habitable rooms in number 74.

The submitted floor plans indicate the principle windows would face the front and the rear of the site. The side windows appear to serve non habitable rooms and should be obscure glazed and non opening below 1.8m. There are proposed rear facing balconies and these would also need to be screened by 1.8m high privacy screens along the sides. It is therefore considered there would be no significant loss of privacy to the adjacent properties.

Policy DMHB 16 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. All 9 flats appear to comply with the minimum space standards.

External Amenity Space

Policy DMHB 18 requires all new residential development to provide good quality and usable private outdoor amenity space. For a 2 bed property a minimum of 25sqm should be provided and 30 sqm for a 3 bed property. It also advises that balconies should have a depth of not less than 1.5m and a width of not less than 2m. It further advises that any ground floor and/or basement floor unit that is non street facing should have a defensible space of not

less than 3m in depth in front of any window to a bedroom or habitable room. For developments in Areas of Special Local Character the provision of private open space will be required to enhance the streetscene and the character of the buildings on site. The design, material and height of any front boundary must be in keeping with the character of the area.

4. Highways

The Highways Officer has advised:

Site Characteristics & Background

The site is located on Harefield Road (designated as Classified) north of Uxbridge town centre. A substantial detached single tenure dwelling is to be demolished and replaced with a new build consisting of 9 flatted units in total (7x2 & 2x3 bedrooms).

There is no existing vehicular access arrangement onto Harefield Road but a new carriageway crossing is proposed to serve a total of 12 on-plot parking spaces. The roadway is covered extensively by waiting restrictions which include double yellow lines within a controlled parking zone operational from 9am to 5pm - Monday to Saturday.

Due to the relatively isolated nature of this location from public transport facilities, the site exhibits a low PTAL rating of 1a and therefore raises dependency on the ownership and use of the private motor car.

Parking Provision

Local Plan Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

In order to comply with the maximum parking standard there is a requirement for 1-1.5 on-plot spaces per unit to be provided for units up to 2 bedrooms in scale with 2 spaces for any 3 bedroom provisions. This would result in a total maximum requirement ranging between 11 to 15 spaces. As 12 spaces are proposed the standard is broadly met. There is no further comment on this aspect. The allocation of spaces would benefit from a parking allocation plan secured by way of condition at the formal application stage.

Electric Vehicle Charging Points

Within the final parking quantum there is a requirement for EVCPs to be provided in line with the emerging London Plan standard which would equate to at least 20% of spaces allocated for 'active' provision with the remaining 80% dedicated as 'passive'. 2 'active' spaces are therefore required with all of the remaining 10 spaces being made 'passive' compliant.

Disabled Compliant Parking

In accord with Hillingdon's Local Plan Part 2 standard - 10% of parking spaces should be disabled compliant.

Cycling Parking Provision

There should be a provision of at least 1 secure and accessible space for each of the 2 bedroom flatted units with 2 spaces for any of the 3 bedroom provisions in order to conform to the adopted minimum borough cycle parking standard.

Vehicular Trip Generation

Local Plan Part 2 Policies DMT 1 and DMT 2 require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Clearly the proposal would raise the level of vehicular activity to and from the site given its current dormant status in terms of vehicle activity. Nevertheless the anticipated uplift in trip

generation related to the 9 new dwelling units does not raise any immediate highway concerns at this stage.

Vehicular Access and Internal Arrangements

In highway impact terms there is no objection in principle to the new single access and internal road layout and dimension which conforms to best practice design standards and allows for passenger vehicles using the site to enter and leave the site in a forward gear which is the recommended practice on highway safety grounds and is therefore welcomed.

With regards to the new crossing, there should be conformity with the Council's 'Domestic Vehicle Footway Crossover' Policy. Finalised detail would be arranged post permission and it should be noted that the new crossing would need to be constructed to this Council standard executed under S184 of the Highways Act 1980 (or suitable alternative arrangement) at the applicant's/developer's expense.

As Harefield Road is a major thoroughfare, it is crucial that there is conformity to the relevant mutual inter-visibility sight-line requirements, as per DfT (Manual for Streets (MfS) circa 2007) best practice for new development road and parking layouts guidance, between vehicles leaving the site and extraneous vehicles/pedestrians on Harefield Road. To assist with maintaining satisfactory sight-lines at the new site entrance for both vehicles and pedestrians entering and leaving the site envelope, it is recommended that a lower height of frontage wall is applied throughout or for at least two metres on either side of the entrance. Ideally the height would not exceed 0.6m to achieve the aim of satisfactory visibility.

Refuse Bin Store Provision

Refuse collection will continue via the roadway (Harefield Road). The bin storage positioning should allow for conformity with the accepted 'waste distance' collection standards which encourage waste collection distances to be within 10m from the point of collection on the public highway. As proposed, there appears to be adherence to the standard. There are no further observations.

Summary

In terms of transport/highways impacts, the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal.

5. Other

Landscaping

Policy DMHB 14: Trees and Landscaping requires:

- A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.
- C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.
- D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

The pre-application submission includes a basic tree survey (condition and value of trees only) which has identified and assessed 28 trees and shrubs. There are no 'A' grade trees. Two 'B' grade trees - a holly (T17) and an off-site Lime (T28), which should be protected and retained. The remaining trees are 'C' grade trees whose condition and value does not necessarily constrain development, albeit they should be retained if possible. The proposal appears to involve significant excavation required to accommodate road level parking, together with a large parking court in the rear garden.

The Landscape Officer has advised that no access has been gained to the rear of the property, required to consider the tree assessment. Details of levels will be required to understand how/where the level changes will occur. The front garden detail is unacceptable, as it provides significantly less than 25% site coverage with soft landscape. The back garden is dominated by car parking. A more detailed tree report will be required to justify the tree removal/retention strategy. A Tree Constraints Plan (TCP), an Arboricultural Implications Assessment (AIA), Arb. Method Statement (AMS) and Tree Protection Plan (TPP) will all be required to support the tree strategy. Finally, the scheme should comply with policies: DMH 6, DMHB 11, DMHB 14 and DMHB 18.

Access for people with disabilities

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 Lifetime Homes Standards as outlined in the SPG Hillingdon Design and Accessibility Statement (HDAS) Accessible Hillingdon' and Policy 3.8 of the London Plan 2011.

It is important that any proposal conforms with the aforementioned documents and requirements and you may wish to discuss the scheme with the Councils Access Officer, Ali Kashmiri akashmiri@hillingsdon.gov.uk prior to the submission of any application.

Basement Development

Policy DMHD 3 advises that the Council will require an assessment of the schemes impact on drainage, flooding, groundwater conditions and structural stability. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. Developers will be required to demonstrate by methodologies appropriate to the site that proposals will avoid adversely affecting drainage and run-off and cumulative impacts upon structural stability.

6. Planning Obligation and CIL (Mayor and LBH)

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

7. Application Submission

List of documents to be submitted

- 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
- Design and Access Statement
- Transport Statement
- Construction Method Statement

- Drainage Assessment & Proposals
- Tree survey
- Arboricultural Method Statement
- Tree protection plan.

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

8. Conclusion

The current proposal, based on the plans and supporting documents that have been submitted could not be supported, as it is considered that the proposed would be harmful to the character and appearance of the area. It would also have an unacceptable impact on the amenity of neighbouring occupiers.

Any revisions would need to ensure they are correct and follow the guidelines within the latest Government guidance as well as the relevant policies and guidance contained within the local plan and the London Plan (2016).

A formal application would be subject to public consultation which may raise other issues.

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.

**Nicola Taplin
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.