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Date: 29th September 2020
Our Ref: 25767/PRC/2020/157

Dear Michael Dempsey

RE: Proposed new flats comprising 9 dwellings
SITE: 72 Harefield Road Uxbridge

I refer to your request for pre-application planning advice dated 27.7.20 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: 19_01_03E - received 27 Jul 2020
190603-P-10 - received 27 Jul 2020
190603-PD - received 27 Jul 2020
Planning Design and Access Statement - received 27 Jul 2020
19_01_09D - received 27 Jul 2020
photomontage - received 27 Jul 2020
19_01_01E - received 27 Jul 2020
19_01_02E - received 27 Jul 2020
19_01_04E - received 27 Jul 2020
Existing floorplans - received 27 Jul 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 follow up pre-application advice with regard to new flats comprising 9 dwellings.

The proposal differs from that previously considered in that the revised plans have:

- reduced the projection to both the 1st and 2nd floors to minimise the "over-dominance / sense of enclosure" impact.
- established the side windows to the adjacent property are for toilet / bathroom and secondary bedrooms only
- ensured the current scheme includes for a minimum 25% soft landscaping to the frontage of the development
- simplified the roof design and incorporated crown roof design as discussed to soften street scene impact

Planning Policy

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
West London Waste Plan (2015)
The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the

outstanding statutory process. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

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 6 x 2 bed and 3 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 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 remains similar in scale to that which was previously considered at the original pre-application stage. The revised scheme has amended the conflicting roof form of the rear outriggers to create a crown roofed addition. It is considered, on balance, that the proposed building would integrate satisfactorily into the site and surroundings.

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

The proposed building 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 over dominance. The adjacent flats to the south are sited 2.2m off the boundary with the application site. The proposed building would project 6.5m to the rear of these flats at upper levels which would not, on balance, 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. The applicant has confirmed that the windows serve a toilet / bathroom and secondary bedrooms only. It is considered on balance, that the proposal would not result in an unacceptable loss of amenity to occupants of flats in both adjacent sites.

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. The proposal includes the provision of balconies and private amenity space for each of the proposed flats along with communal amenity space between the rear of the building and the proposed car parking. Subject to consideration of the landscape officer comments below, the proposal is considered to provide satisfactory amenity space for the future occupants.

4. Highways

Policy DMT 2: Highways Impacts states:

Development proposals must ensure that:

- i) safe and efficient vehicular access to the highway network is provided to the Council's standards;
 - ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;
 - iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;
 - iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads;
- and

v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.

Policy DMT 6: Vehicle Parking states:

A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity.

The Council may agree to vary these requirements when:

i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or

ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

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 planning condition at the formal application stage.

Electric Vehicle Charging Points (EVCP's)

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 which equates to 1 space.

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. A cycle store is indicated but no quantum is specified hence the required level of provision needs to be demonstrated.

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 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.

This submission follows objections to a previous pre-application ref. PRC/2020/16. The pre-application submission includes a basic tree survey, by TMA, which identifies and assesses

the condition and value of 28 trees and shrubs on, or adjacent to, the site. Most are 'C' grade - which would not normally be seen as a constraint on development - albeit their collective value to visual amenity, ecology and green infrastructure may merit more than a 'C'. Two trees are category 'B'; T17 is a holly in the back garden / southern boundary and T28 is the off-site lime on the front boundary.

The proposal will involve significant excavation required to accommodate road level access and parking, together with a large parking court in the rear garden, with a significant amount of tree loss. There is a concern about the amount of residual accessible and attractive amenity space that will remain due to the car parking arrangement and the changes of level across the site.

Any application should comply with policies DMH6, DMHB 11, DMHB 14 and DMHB 18. A full tree report will be required to assess the impact of the development on the existing trees (including any risk due to the change of levels) and provide full tree protection details and an arboricultural method statement. A robust landscape scheme will be required to show how the front and back gardens can provide accessible and attractive amenity space for future occupants. A topographic survey is required to show the existing levels and proposed levels with cross-sections (to scale) to clearly demonstrate how the site will work.

Access

Any full application for planning consent beyond this pre-application stage should ensure that consideration is given to the application of the London Plan, and its contained policy 3.8 (c), as well as the 2019 (intend to publish) London Plan policy D7. Reference should also be made to the Council's 'Accessible Hillingdon' Supplementary Planning Document (adopted September 2017).

The dwelling would need to be constructed to meet the standards for a Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015.

Floor plans at a scale of 1:100 would need to demonstrate compliance with the specifications set out in the above document. Particular attention should be given to the special requirements, and clear access zones, within the living areas, bedrooms and bathrooms. The indicative plans submitted at this stage indicate that the passage ways leading from the lift and stair core would be too narrow to comply with the policy requirement.

Parking bays can be a standard 2.4 x 4.8m car space but should be capable of enlargement to 3.6m wide (or provide a 1.2m transfer hatched area between two bays). All amenity areas, including any private balconies, should meet the requirements of M4(2).

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

Your attention is drawn to the submission requirements of the adopted Local Planning Validation Checklist (June 2020), which is available on the Council's website. The documents required to support a planning application are likely to include:

- 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.

8. Conclusion

It is considered that the submitted application for follow up pre-application advice does, on balance, address the previous concerns raised.

It would however be necessary to provide full and detailed landscaping details to address the Landscape Officers comments in terms of the tree protection, levels and landscaping to ensure that the proposed development would protect the verdant character and appearance of the site and assimilate satisfactorily into the landscape.

The Access Officer's comments about the indicative plans submitted indicating that the passage ways leading from the lift and stair core would be too narrow to comply with the policy requirements should also be addressed.

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
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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.