

APPENDIX I



Chris Connor
Christopher James Architecture
32 Poperinghe Way
Arborfield
Reading RG2 9LZ

Planning Applications Team
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge UB8 1UW

Tel: 01895 250230
Case Officer: Diane Verona
Email: dverona@hillingsdon.gov.uk
Date: 29th December 2020
Our Ref: 26110/PRC/2020/213

Dear Chris Connor

RE: Demolition of existing two storey detached dwelling and the erection of a two storey apartment building to provide 4 x 2 bed, 4 x 1 bed and 1 x 2 bed penthouse together with associated parking, refuse and recycling provision /storage and landscaping.

SITE: 61 Long Lane Ickenham

I refer to your request for pre-application planning advice dated 6/11/2020 and our subsequent meeting on 15/12/2020 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration: 87-SK-10 A, 87-SK-10 A, 87-SK-11 B, 87-SK-12 A, 87-SK-13, 87-SK-14, 87-SK-15, 87-SK-16 A, 87-SK-17 B, 87-SK-18 A, 87-SK-19 B, 87-SK-25 C, 61 Long Lane - Heritage Statement and 19-019-BS- 61 Long Lane Bat Survey Report 2020.

Plan Numbers:

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 east side of Long Lane, a busy road leading to the A40. To the south the site is bounded by the rear gardens of Nos. 1, 3, 5, 7 and 9 Edinburgh Drive. to the north is the neighbouring property at 59A Long Lane which would appear to be a 1990's infill dwellinghouse that benefits from a two storey rear extension and a detached garage as the original attached garage has been converted to habitable accommodation.

The site is flat and spacious, enclosed by mature hedges along its north, east and southern boundaries with an existing detached garage on the southern boundary and a timber framed summer house on the northern boundary.

The area is predominantly residential in character comprising a mixture of semi-detached and detached houses. It is noted that there is a similar development to the one proposed opposite the subject site at 66 Long Lane which was granted permission in July 2014 for the construction of a two storey detached building with habitable roofspace for use as 8 x 2 bed and 1 x 3 bed flats with associated amenity space and parking, involving demolition of existing dwelling following the demolition of the existing building.

The site falls within the Ickenham Village Conservation Area.

The Proposal

The proposal seeks pre application advice in regard to the demolition of the existing detached dwelling and erection of a two storey apartment building with 4 x 2 bed, 4 x 1 bed and 1 x 2 bed penthouse together with associated parking, refuse and recycling provision and storage and landscaping.

Planning Policy

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

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)

The London Plan - Consolidated With Alterations (2016)

The West London Waste Plan (2015)

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 2019.

The Mayor considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required.

On 9th December 2020, the Mayor wrote to the Secretary of State to advise of his intention to formally approve a new draft London Plan, which included his best understanding of the modifications required. The Secretary of State responded on 10th December 2020 requesting that the draft London Plan was re-submitted with more specific amendments to address the 11 previous Directions and 2 additional Directions.

More limited weight should be attached to parts of draft London Plan policies where the Secretary of State has directed specific amendments. Greater weight may be attached to policies that are not subject to the specific amendments from the Secretary of State.

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.HE1	(2012) Heritage

Other Policies:

DMHB 1	Heritage Assets
DMHB 4	Conservation Areas
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
DMT 1	Managing Transport Impacts
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 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology

Main Planning Issues

1. Principle of development

There is an objection in principle to the redevelopment of the site which would result in the loss of an existing property which could establish a detrimental and unwelcome precedent within the Conservation Area, resulting in the loss of a single family dwelling, thereby dramatically altering the character of the Conservation Area. Heritage assets are irreplaceable and therefore any proposals require robust, clear and convincing justification for redevelopment of sites.

2. Design

The NPPF (2019) 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 BE1 of the Hillingdon Local Plan (November 2012) requires that all new development achieves a 'high quality of design in all new buildings, alterations and extensions'.

Policy DMHB 4: of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that: within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:

- A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.
- B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.
- C) Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) states that All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding: · scale of development, considering the height, mass and bulk of adjacent structures; · building plot sizes and widths, plot coverage and established street patterns; · building lines and setbacks, roof lines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

DMHB 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) states that 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 off site provision.

Long Lane and the surrounding area is mainly characterised by detached and semi-detached dwellings that are situated within spacious plots consisting of large front and rear gardens with considerable spacing between one another. Given the significant set back of the neighbouring property to the north, and the proximity to the road of the immediate dwellings to the south, the proposal would not deviate from an established front building line. It is accepted that its two storey height would be comparable to the established properties and therefore be compatible with the rhythm of the street scene on the eastern side of the highway. That said, these properties are predominantly characterised by hipped roofs with considerable open spacing to either side and between the shared boundaries. It is noted that the current proposal has been reduced in width to address the proximity to and the effect of the two storey height on the northern boundary.

This proposed development would still create an element of crown roof, albeit less than the previously pre application. That said, it would still not reflect the traditional hipped roofs of the street scene. Crown roofs on detached houses will not be supported, in particular, on those that lie within a Conservation Area. Although it is noted that this proposed development is not a detached dwelling as such, it would give the appearance of one albeit providing a flattened development and therefore it is considered that this element of the policy still applies.

The proposed building is set back from the existing foremost front building line by approximately 5 m and is in line with the neighbouring property at 59A Long Lane. It extends beyond the rear wall of 59A Long Lane by 4 m which, although acceptable in terms of maximum depth, it is noted this would be for the full height of the two storey building and across the full width of the rear elevation. In addition, balconies are proposed on the rear elevation at first floor level however, the possible increased overlooking has been mitigated to some extent by 1.8 m high privacy screens. The proposal would be set in from the northern side boundary by between 4.750 m and 5.268 m and between 1.865 m and 2.475 m on the southern boundary. The footprint of the new building is approximately equal to that of the existing building albeit in a higher and more compact structure.

This current design has been revised to try to address some of the issues raised in the previous pre-application report under reference 26110/PRC/2019/216 dated 14/02/2020. However, it is considered that it would still fail to satisfactorily integrate with the character and appearance of the surrounding buildings, the wider street scene and would adversely affect the significance, character and appearance of the conservation area, resulting in substantial harm.

It is therefore considered that the proposal would form a bulky and incongruous development which would fail to respect the character and appearance of the neighbouring properties and the spacious character of the surrounding area. It would fail to enhance the character and appearance of the Ickenham Village conservation area. Therefore the proposal would fail to comply with Policies DMHB 4, DMHB 11 and DMHB 12 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020) and Policies 3.5 and 7.4 of the London Plan (2016)

Conservation & Urban Design officer commented as follows: -

Summary of comments: Objection

Historic Environment Designation(s) - Ickenham Village Conservation Area (IVCA) - designated heritage asset

Assessment - background/significance

No.61 Long Lane is a detached, two storey, well proportioned and relatively unaltered attractive dwelling, designed in an Arts and Crafts style. The property dates from the 1930s and forms part of the Metroland development in Ickenham.

The dwelling has an interesting T-plan form with a projecting cross wing, which is single storey to the rear. There are notable projecting gables to the west and south facing elevations comprising of a jetty over a canted bay windows at ground floor. The jetty is upheld by timber brackets and posts either side the bay windows. The gable ends also include attractive herringbone detailing. The rest of the front elevation is set back from the projecting gable end and is defined by its steeply pitched cat-slide roof to the ground floor which is replicated to the rear. Small dormer windows to the cat-slide roofs include mock Tudor timber detailing. Whilst some aspects of the building have been altered overtime it is still considered to have notable architectural and aesthetic value.

The site is modest in size fronted by a red brick wall and tall dense trees. It is situated along the eastern edge of the conservation area along one of the principal roads through the Borough. The area is characterised by similar dwellings with verdant frontages providing a green buffer along the main road, relating to the garden suburb aesthetic of Metroland Ickenham. The vegetation along the street scene has positively matured overtime however some trees relate to the historic Swakeleys House estate. The property is a significant positive contributor to the character and appearance of the conservation area both individually and as part of the 20th century development of the area. The set back from the road and verdant frontage contributes to the sense of openness along Long Lane.

As noted above, the site forms part of the Metroland development of Ickenham, just outside the grounds of the former Swakeleys House estate. The Metroland development within the conservation area has a well-defined grain with properties rhythmically positioned along Long Lane, following the shape of the road. Whilst buildings along Long Lane vary in design and appearance there is an overarching quaint Arts and Crafts/ Garden suburb style to the area. The site and its setting form part of the conservation area and has positive townscape value. The existing building and site form part of how the conservation area is experienced. Generally, it is considered to be a positive contributor to the character and appearance of the conservation area.

The Ickenham Village Conservation Area (IVCA) was designated in 1970 and extended in subsequent years. The most recent extension to the CA was in 2008 and included Austin's Lane into the boundary. The original designated CA included the Grade I Listed Swakeleys House and historic village core. The other Grade I Listed Building within the existing IVCA boundary is Ickenham Manor which is a moated manor site and Scheduled Ancient Monument (SAM). Ickenham has developed from its origins as a rural village, particularly from the influence of Metroland development in the 1930s. Settlements comprising of a historic village core are notable within Hillingdon and the neighbouring Ruislip Village Conservation Area is very similar to Ickenham in relation to how it has grown overtime. The development of an area can be defined by various characteristics which in turn contribute to the overall character, appearance and significance of an area and conservation area can be made up of various character areas/uses which all contribute to its interest.

Whilst it is duly noted that a few sites within the conservation area have been redeveloped, benefiting from permission for substantial flattened developments, the eastern street scene of

Long Lane has not been altered in such a manner and is defined by modestly proportioned detached houses. Previous developments are not considered appropriate precedent to follow.

Assessment - impact & harm

Previous pre-application advice has been provided in relation to the redevelopment of this site. After reviewing the submitted information the proposal has not adequately addressed previous comments therefore the response below has not significantly differed.

Loss of existing building

The proposed redevelopment of the site would include the total loss of the existing property. It would continue and further establish a detrimental, unwelcome precedent within the Conservation Area, resulting in the loss of single, family dwellings, which were originally built as plot-based developments. The loss of the existing dwelling house would significantly alter the character of the site and would not be supported from a historic environment perspective.

In addition to the impact on the historic built environment the redevelopment would also have an impact on the environment in general. Given the declared climate emergency the demolition of a characterful and structurally sound building is wasteful and counter intuitive to the ethos of sustainable development. The emission of greenhouse gases particularly carbon (new and embodied) would be inevitable by the demolition and redevelopment of the site which in turn would have a wider adverse impact on the planet.

As an individual site the immediate harm caused to the conservation area would be limited. However, paragraph 193 of the National Planning Policy Framework, (NPPF, 2019) states that, great weight should be given to the conservation of the heritage asset regardless of the extent of harm. Cumulative loss of buildings that positively contribute to the conservation area would fail to adequately conserve the historic environment affected.

Bulk, Scale and Built form

The proposed development would replace the existing modest built form with a significantly larger structure. The development would be deeper, wider and taller than the existing dwelling house, with the footprint occupying a greater proportion of the site. This would have a significant impact on the current spaciousness of the site which contributes to the character and appearance of the conservation area. The overall scale and bulk of the development would be notably larger than the neighbouring houses, and due to the loss of the existing vegetation along the front boundary the development would have a greater visual presence along the street scene, particularly as the road curves. It would be considered an incongruous, overly dominant building within the conservation area.

The plan form of the building would fail to relate to the residential grain of development along the eastern side of Long Lane. There would be no objections to the positioning of the building in line with No. 59A to the north. However due to the depth of the development it would substantially extend beyond the original rear building line of the existing property and No. 59A for its full proposed height. This would have a negative impact on how the conservation area is experienced within the private spaces associated to the respective sites. The gap between No. 59A along the northern site boundary is duly noted however built form would encroach closer to the southern site boundary. Whilst this is not ideal it is recognised that the existing plot associated to the substation provides a buffer between the neighbouring sites to the south.

The recesses along the side elevations does little to break up the overall mass of the development, which would still appear rather boxy, particularly to the rear. The block-like appearance would be further exacerbated by the substantial crown roof element. Crown roofs are not an original characteristic of the conservation area and where entirely new buildings are proposed, it is expected that the design avoid the inclusion of such roof forms.

The roof form would also lack simplicity, by the inclusion of dormer windows of varying designs. The fake dormer along the side elevation appears as an afterthought to accommodate the service riser. As a new development it is expected that building services better integrated into the design of the building, avoiding the need to tack on odd built elements.

Design

The current house is a good local example of the type of 'Metroland' development that took place in the early 20th century. The design of the proposal would fail to harmonise with the conservation area's garden suburb aesthetic. The general design and appearance of the proposed building seems to relate to the new modern development opposite the site (No. 66), which would be considered inappropriate. Large plots along Long Lane, are distinctly designed with notable individual characteristics, defined by the principles of plot-based development rather than properties built from a 'pattern book'. The symmetrical design of the principal elevation would fail to relate to the dominant asymmetry of buildings evident along the street scene. The minor differences between the projecting elements to the front provides very little variation. The basic articulation of the elevations lacking any distinctive detailing, provide very little interest to the building. The roof form would lack simplicity, made worse by the varied design of the dormers. The large box dormer to the rear and larger triangular dormer to the front would be considered in principle unacceptable. The fake dormer along the side elevation appears as an add on built element in order to accommodate the service riser. As a new development it is expected that building services would be better integrated into the design of the building, avoiding the need for such built elements.

Balconies are not an established feature of the conservation area, and those to the rear of the proposed development would have a notable negative impact on neighbouring properties to the side and rear. The presence of existing vegetation allowing the site to be obscured from neighbouring properties cannot be guaranteed for the longevity of the development. Vegetation is not a permanent feature and can easily be removed due to human intervention or natural cause. Therefore, it should not be used as a means of mitigating against inappropriate development or poorly designed elements to a building. The development would adversely urbanise the character and appearance of the site, lacking domestic subservience.

Frontage

The green characteristics of the site relate to the garden suburb aesthetic of the area, enhancing the character and appearance of the Conservation Area and street scene. The loss of vegetation and trees to the front of the site would unacceptably open up views into what is a well, naturally enclosed site. The trees are a positive streetscape feature both in terms of the natural and historic environments. The removal of mature vegetation from the front boundary would unacceptably increase the visibility of the building's scale, bulk and mass from Long Lane.

The introduction of tall brick piers and railings would be considered in principle unacceptable. It would introduce an urban boundary treatment within a street scene which is predominantly characterised by brick walls and mature hedges, as existing on the site. Whilst other site may have benefited from such a boundary treatment, they are not considered appropriate precedents to follow. Railings maybe common in more urban environments within the centre of London, such as outside 18th and 19th century townhouses. Such alterations to the site's boundaries would further erode the character and appearance of the conservation area and it is not clear why the existing boundary treatment cannot be retained and if need be slightly adapted.

There would be concern that the proposed relocated central entrance to the site may result in harm to the young street tree along the existing grass verge.

Harm

In accordance to Hillingdon's Local Plan Part 2 (HLPP2) policy, DMHB 4 (adopted January 2020), the proposed redevelopment has not been robustly justified. The proposed intensified occupation of the site would introduce a new building type along the eastern side of Long Lane. A flatted block would be a stark contrast to the existing single dwelling houses to the north and south of the site. The development would unacceptably add to the existing cluster of flatted developments along Long Lane, within the IVCA boundary. Flatted blocks are an uncharacteristic feature of the IVCA and the continuous introduction of such developments on large plots within the conservation area would inevitably erode the original quality of the designated heritage asset.

Whilst it is evident that permission has previously been granted for development of sites, for flats, within the conservation area, it does not automatically establish the principle of such developments to other sites. Each site and proposal must be considered upon its own individual merits. As proposed, the redevelopment of the site and loss of the existing building would be considered in principle unacceptable.

The loss of a building that positively contributes to the conservation area would harm original character and appearance of the conservation area. In isolation such harm would be less than substantial. However, consideration must also be given towards the cumulative impact of such development within the conservation area, as duly noted under paragraph 28 of Historic England's Good Practice Advice Note 2 (GPAN2). In establishing and continuing such a precedent for redevelopment within the conservation area, it would encourage further redevelopment proposals, which would adversely affect the significance, character and appearance of the conservation area. Inevitably eroding the authenticity of the place, resulting in substantial harm to the heritage asset.

The Ministry of Housing, Communities and Local Government (MHCLG), Historic Environment guidance (updated, July 2019) clearly highlights the 'need to consider the implications of cumulative change' and the potential of threatening the conservation of the area going forward. As noted above the cumulative impact of this type of redevelopment would have a detrimental impact on the significance of the conservation area. Heritage assets whether designated or non-designated are irreplaceable; any harm requires robust, clear and convincing justification.

Conclusion: Objection - less than substantial harm.

The proposal would be considered in principle unacceptable. It would be considered harmful to the character and appearance of the conservation area, failing to adequately preserve or enhance the conservation area in accordance to the Planning (Listed Buildings and Conservation Areas) Act 1990.

3. Amenity

Policies DMHB 4 and DMHB 11 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020) 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 DMHB 11 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020) which states that development proposals should not adversely impact on the amenity of adjacent properties and open space.

The proposed building is set back from the existing foremost front building line by approximately 5 m and is in line with the neighbouring property at 59A Long Lane. It extends beyond the rear wall of 59A Long Lane by 4 m which, although acceptable in terms of maximum depth, it is noted this would be for the full height of the building and across the full width of the rear elevation. In addition, balconies are proposed on the rear elevation at first

floor level however, the possible increased overlooking has been mitigated to some extent by 1.8 m high privacy screens. The proposal would be set in from the northern side boundary by between 4.750 m and 5.268 m and between 1.865 m and 2.475 m on the southern boundary. The footprint of the new building is approximately equal to that of the existing building albeit in a more compact structure.

The proposed building would be set back from the existing foremost front building line to be in line with the existing front building line of the neighbouring property at 59A Long Lane. The proposal would be set in from the northern side boundary by between 4.750 m and 5.268 m and between 1.865 m and 2.475 m on the southern boundary. The footprint of the new building is approximately equal to that of the existing building albeit in a more compact and higher structure.

The proposal would not intersect the 45 degree line of sight when viewed from the nearest first floor habitable room windows in the rear elevation of this neighbouring property. This revised design, with the increased set in from the side boundary, has mitigated the affect on the residential amenities of 59A Long Lane by reason of over dominance and over shadowing. That said, it is noted that this neighbouring property benefits from solar panels on the south facing side roof slope and any future submission should take these into consideration. The proposed balconies to the rear would have privacy screens to prevent overlooking and loss of privacy to 59A Long Lane.

The neighbouring properties at 1 to 9 (odds) Edinburgh Drive have rear gardens that adjoin the southern side boundary of the subject site. Nos 1 and 3 would be the most likely to be affected by the proposal however, No. 1 is located in excess of 32 m from the shared boundary and No. 3 in excess of 20 m from the shared boundary. The currently existing boundary treatment of a mature high hedge is to be retained therefore it is considered that these neighbouring properties would not be adversely affected by the proposal.

4. Highways

Highways & Transportation commented as follows: -

Site Characteristics & Background

The site is located on Long Lane (designated as Classified) in Ickenham within a residential catchment. There is an existing detached dwelling which is to be demolished and replaced with a new build containing a total of 9 flatted units consisting of 4x1, 4x2 and a 2-bed bedroom penthouse.

The existing vehicular access arrangements consisting of two separate crossings will be consolidated to a single centralised carriageway crossing. The road is covered extensively by waiting restrictions including double yellow lines directly outside the address. Due to the relatively isolated nature of this location from public transport facilities, the site exhibits a low PTAL rating of 2 which is considered as low and therefore raises dependency on the ownership and use of private motor transport.

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.

The Council's maximum standard requires between 1-1.5 spaces to be provided on-site for each of the flatted units. In total nine spaces are proposed on the frontage area hence the standard is broadly met. There is no further comment on this aspect. The allocation of spaces i.e. 1 per flat would benefit from a parking allocation plan presented at the formal application stage.

Electric Vehicle Charging Points (EVCP's)

In line with the emerging London Plan, within any final parking quantum there is a requirement for a minimum of 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. In this case, this would equate to 2 EVCP's for 'active' provision with the remainder 7 spaces designated as 'passive'.

Cycling Parking Provision

There should be a provision of at least 1 secure and accessible space for each of the flatted units (totalling 9 spaces) in order to conform to the adopted minimum borough cycle parking standard. This quantum is to be provided to the side of the new build thus conforming to the standard with an acceptable positioning of a secure and accessible compound.

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 single tenure status. 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 singular access and internal roadway layout and scale which 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.

The new carriageway access (and closure of existing access points) would be facilitated at the applicant's expense and should conform to the Council's maximum allowable width for crossing provisions stipulated within the Council's 'Domestic Vehicle Footway Crossover Standard' (DVFCs). Final provisions would be implemented post-permission under S184 of the Highways Act 1980 (or suitable alternative arrangement).

In addition, satisfactory highway visibility splays at the new access point should be delivered by ensuring that there is unobstructed visibility for a height of 0.6m for a distance of at least 2-3 metres on both sides of the new opening at the back of footway. This aspect is crucial as the site entrance would be located on the apex of a road bend which inherently prejudices natural sight-line visibility.

Refuse Bin Store Provision

Refuse collection will continue via the roadway (Long Lane). The proposed bin storage is positioned to the side of the new build. 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, should be pursued. As presented, this distance is exceeded however it would be anticipated that an informal on-plot management regime will be established to ensure that any refuse is positioned within the above distance parameter on collection days. Alternatively, a closer positioning of the bin storage area toward the public highway could be proposed to remedy this point. 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

The proposal involves the demolition of the existing building and the construction of a part

two, part two and a half storey apartment building with 4 x 2 bed, 4 x 1 bed and 1 x 2 bed penthouse.

The Technical housing standards - nationally described space standard states that in order to provide one bed space, a single bedroom has a floor area of at least 7.5 m² and is at least 2.15 m wide and in order to provide two bed-spaces, a double (or twin bedroom) has a floor area of at least 11.5 m². The submitted plans indicate that all the proposed flats would exceed these minimum standards.

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

Table 3.3 minimum floor space standards in Policy 3.5 of The London Plan states that a 2 bed 3 person flat should have a minimum internal floor space of 61 sqm and a 1 bed two person flat a minimum internal floor space of 50 sqm. The proposed units would all be well in excess of this.

The units would be mainly single aspect with outlook either to the front or rear of the site. Side elevation windows are proposed at ground and first floor levels to the habitable rooms. These windows would be a distance of between 5.268 m towards the front elevation and 4.750 m towards the rear. They could also result in loss of privacy however, if these are proposed to be obscure glazed, then the only access to light and outlook would be to either the front or the rear of the building.

The ground and first floor units would have open plan kitchen and dining area facilities and these main living spaces would have access to light via the front or rear elevations and be single aspect as stated above giving rise to limited access to light and outlook towards the rear of each of the living spaces. The proposed top floor flat would have sufficient light to main living area however the kitchen area would only have access to light via conservation roof lights which would be considered to be inadequate. The proposed balconies to the rear at first floor and second floor levels would have 1.8 m high side privacy screens to prevent loss of privacy and overlooking to the neighbouring property at 59A Long Lane.

Policy DMHB 18 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020) stresses the importance of new buildings and extensions providing adequate amount of external amenity space, that not only protects the amenity of the occupants of the proposed development, but also of those of the surrounding buildings, as well as protecting both parties privacy. Table 5.3: Private Outdoor Amenity Space Standards states that 2 bed flats should be provided with a minimum of 25 sqm of private external amenity space and one bed flats 20 sqm of private external amenity space. Flats 2 and 3 on the rear ground floor would have dedicated private amenity areas in excess of 37 sqm. Flats 6 and 7 on the rear first floor would have balconies that would provide approximately 5 sqm of private external amenity space and the penthouse flat would have a rear balcony providing 6 sqm of private external amenity space. All the flats would have access to a communal rear garden space in excess of 700 sqm.

The Council's Access officer commented as follows: -

Any future planning application would need to satisfy the requirements of London Plan policy 3.8. Reference should also be made to policy D7 of the 2019 (intend to publish) London Plan. Detailed guidance on the technical housing standards can be obtained within the Council's 'Accessible Hillingdon' SPD (adopted September 2017).

Developments comprising 9 residential units or less are required to be designed and constructed to meet the standards for a Category 2 M4 (2) dwelling as set out in the SPD referred to above. Floor plans submitted as part of a planning application should be at a

scale of at least 1:100, and should include furnished planned layouts, and clearly demonstrate the access zones and other provisions as set out in Approved Document M to the Building Regulations.

Full access for older and disabled people must be provided throughout the development, including step-free access to private and shared roof gardens, balconies, other amenity areas, and all storage areas.

It is noted that the penthouse shown on plan features a stepped approach to its principal private entrance which would fall foul of the policy requirement referred to above.

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

The Council has a Local Planning Validation Checklist, which was adopted in June 2020. List of documents to be submitted with a future application is likely to include:

Application Form
Site Location Plan
Existing Floor Plans
Proposed Floor Plans
Existing Elevations
Proposed Elevations
Design and Access Statement and Heritage Statement
Arboricultural Impact Assessment,
Tree Constraints Plan,
Tree Protection Measures
Arboricultural Method Statement.
Bat Survey and Mitigation Strategy

8. Conclusion

It is considered that the overall scale and bulk of the proposed development would be notably larger than neighbouring houses. Due to the loss of the existing vegetation along the front boundary the development would have a greater visual presence along the street scene, particularly as the road curves. There is an objection in principle to the redevelopment of the site which would result in the loss of an existing property which could establish a detrimental and unwelcome precedent within the Conservation Area, resulting in the loss of a single family dwelling, thereby dramatically altering the character of the Conservation Area.

The proposal would form a bulky and incongruous development which would fail to respect the character and appearance of the neighbouring properties and the spacious character of the surrounding area. It would fail to enhance the character and appearance of the Ickenham Village conservation area. Therefore the proposal would fail to comply with Policies DMHB 4, DMHB 11 and DMHB 12 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020) and Policies 3.5 and 7.4 of the London Plan (2016).

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.

Diane Verona
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.