Residents Services

APP. REF. NO: 26110/APP/2021/1488

DELEGATED DECISION

- *Please select each of the categories that enables this application to be determined under delegated powers*
- *Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.*

APPROVAL RECOMMENDED: GENERAL	Select Option
1. No valid planning application objection in the form of a petition of 20 or more signatures, has been received	☐
2. Application complies with all relevant planning policies and is acceptable on planning grounds	☐
3. There is no Committee resolution for the enforcement action	☐
4. There is no effect on listed buildings or their settings	☐
5. The site is not in the Green Belt (but see 11 below)	☐
REFUSAL RECOMMENDED: GENERAL	
6. Application is contrary to relevant planning policies/standards	☐
7. No petition of 20 or more signatures has been received	☐
8. Application has not been supported independently by a person/s	☐
9. The site is not in Green Belt (but see 11 below)	☐
RESIDENTIAL DEVELOPMENT	
10. Single dwelling or less then 10 dewlling units and/or a site of less than 0.5 ha	☐
11. Householder application in the Green Belt	☐
COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT	
12. Change of use of retail units on site less than 1 ha or with less than 1000 sq m other than a change involving a loss of A1 uses	☐
13. Refusal of change of use from retail class A1 to any other use	☐
14. Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.	☐
CERTIFICATE OF LAWFULNESS	
15. Certificate of Lawfulness (for proposed use or Development)	☐
16. Certificate of Lawfulness (for existing use or Development)	☐
17. Certificate of Appropriate Alternative Development	☐
CERTIFICATE OF LAWFULNESS	
18. ADVERTISMENT CONSENT (excluding Hoardings)	☐
19. PRIOR APPROVAL APPLICATION	☐
20. OUT-OF-BOROUGH OBSERVATIONS	☐
21. CIRCULAR 18/84 APPLICATION	☐
22. CORPSEWOOD COVENANT APPLICATION	☐
23. APPROVAL OF DETAILS	☐
24. ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where Heads of Terms have already received Committee approval	☐
25. WORKS TO TREES	☐
26. OTHER (please specify)	☐

The delegation powers schedule has been checked. Director of Residents Services can determine this application.

Case Officer

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informatives are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DATES SHOULD BE USED IN THE PS2 RETURNS TO THE ODPM

Item No. **Report of the Head of Planning, Transportation and Regeneration**

Address 61 LONG LANE ICKENHAM

Development: 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.

LBH Ref Nos: **26110/APP/2021/1488**

Drawing Nos: 1110
1200
1111
1205
1206
1207
1210
1300
1305
Covering Letter (dated 13/04/2021)
Bat Survey Report (dated September 2020)
Heritage Statement (dated April 2021)
Plan of Tree Constraints (dated February 2021)
Tree Protection Plan (dated March 2021)
Planning, Design and Access Statement (dated March 2021)
1106
1105 Rev. A
B.S. 5837 Arboricultural Report, Implications Assessment and Method Statement (dated 16/03/2021)
Energy Statement (dated 7th April 2021)
1306
1310
1315

Date Plans received : 23/04/2021 **Date(s) of Amendment(s):**

Date Application Valid: 23/04/2021

1. SUMMARY

Planning permission is sought for the demolition of an 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.

The proposed development would be detrimental to the character, appearance and visual amenities of the existing street scene and the surrounding Ickenham Village Conservation Area. It is considered that the proposed rear balconies would cause unacceptable overlooking into the rear gardens of neighbouring properties, thus resulting in a loss of privacy (both real and perceived). The proposed development would provide substandard forms of internal accommodation for the future occupiers of Flats 1 and 4, due to privacy and overlooking issues. The proposal has failed to demonstrate that the development would provide a suitable housing mix. In addition to this, the proposal would

cause harm to protected species (i.e., the bat roost within the existing property) and their habitat.

It is therefore recommended that this application is refused for the reasons set out in this delegated report.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The proposed development, by reason of its size, scale, massing, height and design (including its uncharacteristic crown roof form, dormers and balconies) would fail to harmonise with the character and architectural composition of the surrounding properties, appearing as a visually dominant, incongruous and bulky form of development which would be detrimental to the visual amenity of the street scene and harmful to the character and appearance of the surrounding Conservation Area. The proposal therefore conflicts with Policies BE1 and HE1 of the Hillingdon Local Plan: Part One- Strategic Policies (2012) and Policies DMHB 1, DMHB 4, DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policies HC1, D1, D3 and D4 of the London Plan (2021) and the National Planning Policy Framework (2021).

2 NON2 Non Standard reason for refusal

The proposed development would result in the net loss of a five-bedroom dwelling (i.e., a family sized unit) and fails to provide any three or more bedrooms (family sized) units. Robust justification has not been provided to demonstrate that the provision of family sized units would be unsuitable or unviable. The proposal would therefore not provide a suitable mix of housing to support sustainable, inclusive and mixed communities contrary to Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy H10 of the London Plan (2021) and the National Planning Policy Framework (2021).

3 NON2 Non Standard reason for refusal

The proposed development, by virtue of the proposed footway directly in front of the main habitable room windows serving Flats 1 and 4 and in the absence of any defensible space, would cause unacceptable overlooking and a loss of privacy (both real and perceived) for the future occupants of these flats. The proposal would therefore result in a substandard form of internal residential accommodation to the detriment of the amenity of the future occupiers of Flats 1 and 4, contrary to Policies DMHB 15 and DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy D6 of the London Plan (2021) and the National Planning Policy Framework (2021).

4 NON2 Non Standard reason for refusal

The proposed development, by virtue of the raised position of the first and second floor rear balconies, would result in overlooking into the rear gardens of the adjacent neighbouring properties at numbers 59a Long Lane, numbers 2 to 13 Edinburgh Drive and numbers 13 and 15 Edinburgh Close. The proposed balconies would therefore cause an unacceptable loss of privacy to the detriment of the living conditions of neighbouring residential occupiers, contrary to Policy BE1 of the Hillingdon Local Plan: Part One- Strategic Policies (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2021).

5 NON2 Non Standard reason for refusal

The proposed development, by virtue of its scale, depth and siting in proximity to shared

boundaries would result in an undue loss of outlook from and visual intrusion on the rear gardens of properties on Edinburgh Drive to the detriment of the living conditions of neighbouring residential occupiers, contrary to Policy BE1 of the Hillingdon Local Plan: Part One- Strategic Policies (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2021).

6 NON2 Non Standard reason for refusal

The proposed development, by reason of the demolition of the existing house which has been identified as a bat roost, fails to meet all the derogation tests detailed in The Conservation of Habitats and Species Regulations 2017 (as amended). The proposal would therefore cause harm to protected species and their habitats, contrary to Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy G6 of the London Plan (2021) and the National Planning Policy Framework (2021).

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to 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.

DMEI 10	Water Management, Efficiency and Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 4	Residential Conversions and Redevelopment
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists

DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP HC1	(2021) Heritage conservation and growth
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF5	NPPF 2021 - Delivering a sufficient supply of homes
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

3 I71 LBH worked applicant in a positive & proactive (Refusing)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service.

a) We have however been unable to seek solutions to problems arising from the application as the principal of the proposal is clearly contrary to our statutory policies and negotiation could not overcome the reasons for refusal.

4 I74 Community Infrastructure Levy (CIL) (Refusing Consent)

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL

Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012.
For more information on CIL matters please visit the planning portal page at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

3. CONSIDERATIONS

3.1 Site and Locality

The application site is in a prominent position on the western side of Long Lane, and forms part of the Ickenham Village Conservation Area. The site comprises a two-storey detached property on a generously sized plot of land. The existing property is characterised by its front gable feature, cat-slide roof profile with front dormers and external brick work finish. The property benefits from a detached garage and has been extended by a two-storey side extension. To the front of the site, is a brick wall and wooden gates spanning across the width of the two existing vehicular crossovers serving the site.

The surrounding area is primarily defined by two-storey detached houses on sizeable plots of land which are set back from the road frontage. It is considered that these characteristics adds to the spaciousness of the suburban local area. Over recent years, flatted developments have been constructed along Long Lane, but these are limited in number and the design of these building respect the significance of the surrounding Conservation Area.

The site contains trees which are protected by the site's Conservation Area designation. The site has a Public Transport Accessibility rating of 2 (poor). The site falls within Flood Zone 1, although the highway fronting the site is partially designated within a surface water flood risk zone (based on the Council's GIS map).

3.2 Proposed Scheme

Planning permission is sought for the demolition of an 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.

3.3 Relevant Planning History

26110/78/2057 Rydal House, 61 Long Lane Ickenham

Householder development - residential extension(P)

Decision: 20-02-1979 Approved

26110/A/79/0708 Rydal House, 61 Long Lane Ickenham

Erection of single-storey extension to dining/ sitting room.

Decision: 03-05-1979 WD

26110/D/83/0513 Rydal House, 61 Long Lane Ickenham

Erection of a single-storey building for use as a leisure room.

Decision: 09-06-1983 WD

26110/E/98/0354 61 Long Lane Ickenham

Erection of a detached garage

Decision: 23-04-1998 Approved

26110/PRC/2019/216 61 Long Lane Ickenham

Demolition of existing detached dwelling and erection of a two storey building, with rooms in the roof space to provide 9 x 2 bed self-contained flats

Decision: 14-02-2020 OBJ

26110/PRC/2020/213 61 Long Lane Ickenham

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.

Decision: 29-12-2020 OBJ

Comment on Planning History

The relevant planning history attached to this site is referenced above.

4. Advertisement and Site Notice

4.1 Advertisement Expiry Date:- Not applicable

4.2 Site Notice Expiry Date:- 11th June 2021

5. Comments on Public Consult

EXTERNAL CONSULTEES:

49 neighbouring properties were consulted on 28th April 2021. A press notice was published on 12th May 2021 and a site notice was displayed on 21st May 2021. The consultation period expired on 11th June 2021. 15 representations were received from separate address, and their comments are summarised as follows:

-Loss of a family home with notable architectural and aesthetic value
-The Borough needs family homes, not more tiny flats
-Harm to the character of the Ickenham Village Conservation Area
-Out of keeping with the street scene (this includes the hardstanding and communal parking)
-The Design and Access Statement is misleading as the building is 3 storeys not 2 storeys

-Loss of light, outlook and overshadowing for neighbouring gardens
-Concerns about the multiple flats overlooking into neighbouring gardens
- Loss of privacy/overlooking caused by the rear balconies (the privacy screens are insufficient)
- The rear balconies are visually intrusive
- The development is overbearing and out of scale
-Overdevelopment of the site
-The footprint of the building extends into the rear garden space greatly
- The design of the development includes features not permitted in a Conservation Area, (i.e., flat roof dormers, skylights and roof lights)
-Bat roots have been identified at the site
-Disruption to nature and wildlife
-Harm to trees

- Disturbance to the well-being of residents
-Insufficient number of on-site car parking spaces
-Significant harm to local on-street parking conditions
-The dimensions of the disabled space do not meet Part M of the building regulations
-Insufficient space for vehicular entry/exit
-Electric vehicle charging points needs to be provided in accordance with planning policy
-Traffic and congestion implications
- Vehicles entering and exiting the site at the same time will hold up traffic on Long Lane
-Surface water flooding issues
-Light, noise, dust and air pollution
-Increase noise and disturbance
-A condition should be secured to restrict construction hours, if approved
-A demolition and construction plan and details relating to fencing and hedging should be condition
-The Leylandii hedge is not being maintained or kept to an acceptable height
-Lack of clarity on whether the shared boundary treatment and hedges would be retained
-No clear details of the bin store (i.e., its height)
-A Flood Risk Assessment and Drainage Assessment (SuDS) should be submitted
-Concerns about the location of the bin store next to No.59a Long Lane's boundary causing smell and rodents
-The proposed plans have a lack of clarity for fire regulations
-The boundary fence has been replaced at the expense to residents on Edinburgh Drive
-It is unclear who will maintain the site and site boundary should there be any issues in the future
-Devaluation of neighbouring properties
-Concerns about sewer capacity, electricity, water and gas supply

Planning Officer Response: The following section of the report covers the concerns raised in respect to the loss of the existing dwelling; impact on the character and appearance of the surrounding Conservation Area; neighbouring residential amenity; flood risk; sustainable drainage; ecology/protected species; trees; landscaping; parking (including the provision of disabled spaces and electric charging points) and highway safety.

The site is in Flood Zone 1 (i.e., a low probability of flooding). As such, there is no policy requirement for a Flood Risk Assessment to be submitted. A Sustainable Water Management Scheme (which incorporates SuDS) would be secured by condition, in the event of an approval.

The application is not proposing a major development (i.e., 10 dwellings or more). As such, there is no policy requirement for a Fire Statement to be submitted. The fire safety precautions of the proposed development will be covered by Building Regulations. The concerns raised about property values, infrastructure capacity, and who will be responsible for maintaining shared boundary treatment and existing hedges are not planning considerations.

If planning permission were to be granted, full details in respect to the landscaping, boundary treatment, disabled parking, electric charging points, and refuse/recycling facilities would have been secured by conditions. Construction hours are governed by the Control of Pollution Act 1974. Notwithstanding this, a Construction Management Plan would have been secured by condition, if this application had been recommended for approval.

Ickenham Residents Association: This is going to be a massive conversion and will dwarf No. 59.
9 Parking spaces have been allocated for 9 flats which could accommodate up to 12 people plus at a

minimum. No parking spaces shown for visitors or disabled people. This is a sad story developing in Long Lane with more and more residential homes being converted to flats, i.e.

-17-19 Long Lane 2016/3578- Conversion of roof to create 2 x bed flats . Approved 16.12.16 (above commercial premises)
-30 Long Lane- 2018/3311- Conversion of 3 x studio flats and 1x 3-bed flat into 2 x 2, 1 x 3-bed and 1 x4-bed flats. Allowed10.12.19
-60 Long Lane 2019/2773- Conversion to 8 x 2 bed flats. Approved 20.02.20
-60 Long Lane 2020/2522 - 9 x 2-bed flats. Refused/appeal dismissed 01.03.21
-66 Long Lane 2016/2219- 8 x 2-bed and 1 x 3-bed flats. Approved 07.12.16
-75 Long Lane 2019/304- Change of use from residential to day-care centre. Approved 13.06.19
-88 Long Lane 2018/2619 Conversion to 7x 3-bed flats, 2 x 1-bed flats. Approved 25.07.19

Where will it end? We are completely in the hands of your Planning Team with their greater expertise and facilities and trust they will take our points into consideration to arrive at the correct decision

A Ward Councillor would wish this application to be determined at the Minors Planning Committee if recommended for approval. This is due to concerns on its bulk size and density and its effect on the street scene. The additions of the balcony will be detrimental to the privacy of adjoining neighbours and if allowed could set an unwarranted precedence. The siting of the bin storage is not conducive to good practice that can cause unwarranted noise and odours to the neighbour.

INTERNAL CONSULTEES:

COUNCIL'S PLANNING POLICY OFFICER:

The site consists of a large (289sqm GIA) existing family dwellinghouse. Family dwellinghouses are defined in the London Plan (2021) as 'a dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms.

Policy DMH 2 of the Local Plan: Part 2 (2020) outlines that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Paragraph 4.6 outlines that the current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties. Applicants proposing residential schemes will be required to demonstrate that this need has been taken into account.

Policy H10 of the London Plan (2021) also outlines that the Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties. Applicants proposing residential schemes will be required to demonstrate that this need has been taken into account, the exact proportion of which is to be determined by location specific criteria.

The site is located outside of a town centre and only has a PTAL rating of 2, but it is within a 10-minute walk of Ickenham Tube Station. It is not considered that there is any particular site constraint or mix of uses that would make it inappropriate for family dwellings. Therefore, the proposal would result in a net loss of family dwellings which is deemed to be contrary to Development Plan policies on housing mix. Please also note the other tests within Policy DMH 4, which the applicant does not appear to have considered

in their planning statement.

COUNCIL'S TREES AND LANDSCAPE OFFICER:

This site is occupied by a two-storey detached house, with a detached garage, situated within a spacious plot located on the east side of Long Lane. The area is predominantly residential with the site bounded to the south by the rear gardens of Edinburgh Drive. The Long Lane boundary is defined by a scruffy outgrown conifer hedge. The site lies within the Ickenham Village Conservation Area, a designation which protects trees.

The site has been the subject of pre-application advice from the LPA. A tree report including an arboricultural implications assessment and tree protection method statement has been prepared by Merewood, dated 16 March 2021. The survey has identified and assessed 8 trees and 4 groups, of which none are category 'A' trees. There are 3 category 'B' trees; T3 Lawson cypress, T4 silver birch and T6 False acacia. The remaining 5 individual trees and 4 groups are lower value category 'C', with 1 'U'. Three 'C' grade (relatively low value) trees will be removed to enable the development; T1 Japanese maple, T8 laburnum and G1 Lawson cypress.

At 4.2.2 the report notes that a recently planted flowering cherry tree in the highway verge will be removed to facilitate the relocation of the driveway entrance. This is a third party (Council-owned/ highway) tree which is outside the control of the developer. It is understood that no discussion has taken place with the Council's Trees & Woodlands manager regarding the loss/ replacement of this tree.

A method statement and tree protection details have been submitted regarding the safeguarding of the remaining trees. Arboricultural monitoring and supervision have also been specified. The D&AS refers to the landscape proposals in section 5.10. Features include the retention of landscaped boundaries and timber fencing to the side boundaries, the replacement of the overgrown hedges and brick wall on the front boundary, the use of permeable block paving, the retention of the laurel and conifer hedge to the boundary of 589 and the sub-station. To the rear, the ground-floor flats will have private amenity space with shared amenity space available for the other residents. Additional planting and hard landscape detailing to enhance the character and appearance of the site (and Conservation Area) should be conditioned.

No objection subject to condition RES8, to include reports of the on-site tree monitoring/ supervision meetings, should be submitted to trees@hillingdon.gov.uk, RES9 (parts 1,2,4,5 and 6) and RES10. The site layout plan proposes the replacement of the street tree with two new / replacement trees within the highway verge. Hillingdon's Trees & Woodlands Manager has agreed to the removal of the highway tree, subject to a payment of £400 to be made to Green Spaces. This sum is required to cover the costs of the supply, planting, establishment and maintenance of two replacement street trees. This will require a S.106 agreement to secure the replacement planting outside the site boundary.

Planning Officer Comment: Photographic evidence shows that the Cherry tree within the highway verge has since been removed. There is therefore no requirement for a replacement highway tree to be secured through a S.106 legal agreement.

COUNCIL'S ACCESS OFFICER:

Any grant of planning permission should include the following conditions:

Prior to works commencing, details of step free access via the principal private entrance shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building.

REASON To ensure that an appropriate standard of housing stock, in accordance with the 2021 London Plan policy D7 is achieved and maintained.

The dwellings hereby approved shall 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, and all such provisions shall remain in place for the life of the building.

REASON: To ensure that an appropriate standard of housing stock, in accordance with the 2021 London Plan policy D7 is achieved and maintained.

COUNCIL'S CONSERVATION OFFICER:

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 dwelling houses, with verdant frontages providing a green buffer along the main road and 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 a subtle Arts and Crafts influence to some of the buildings, the traditional manner in which the properties have been built contribute to the garden suburb aesthetic of 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 into a suburban environment, resultant of the 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, benefitting from permission for substantial flatted developments, the eastern street scene of Long Lane has not been altered in such a manner and is defined by modestly proportioned detached houses. Furthermore, beyond the conservation area boundary to the east the area is defined by two-storey dwelling houses. Previous developments are not considered appropriate precedents to follow.

Assessment - impact & harm:

Previous pre-application advice had been provided in relation to the redevelopment of this site. After reviewing the submitted information the proposal has not be significantly amended, therefore the assessment below does not greatly differ.

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, many of which were originally built as plot-based developments. The loss of the existing dwelling house would significantly alter the character of the site, and the east side of Long Lane's street scene. It would not be supported from a historic built environment perspective.

In addition to the impact on the historic built environment the redevelopment would also have an impact on the wider environment in general. The demolition of a characterful building is wasteful and counterintuitive to the ethos of sustainable development. It is inevitable that the demolition and redevelopment of the site would contribute to climate change to some degree.

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. The existing cat-slide roof form limits the bulk of the existing property, the proposal would be starkly contrasting. 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, with a double pile arrangement. There would be no objections to the positioning of the proposed building, in line with No59 to the north. However due to the depth of the development it would significantly extend beyond the original rear building line of the existing property and No59 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 neighbouring 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 substation site provides a buffer between the neighbouring sites to the south.

The recesses along the side elevations of the built form, 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 a characteristic feature of the conservation area, and where entirely new buildings are proposed, it is expected that the design avoids the inclusion of such roof forms.

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 and appearance of the proposed building seems to relate to the new modern development opposite the site (No66), 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 and that of the existing building. 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 or quality to the building.

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 lost due to human intervention or natural causes. Therefore, it should not be used 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 street scape 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 proposed building's scale, bulk and mass from Long Lane.

The introduction of 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 sites may have benefitted from such a boundary treatment, they are not considered appropriate precedents to follow. Timber could be considered as an alternative.

Railings maybe common in more urban environments within the centre of London, such as outside 18th and 19th century townhouses. However to continue the unacceptable precedent of railings along the street scene, would further erode the character and appearance of the conservation area.

There would be concerns 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 light of Hillingdon's Local Plan Part 2 (HLPP2) policy, DMHB 4 (January 2020), the proposed demolition of the existing building 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 redevelopment 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 would harm the 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 Managing Significance in Decision-Taking in the Historic Environment, Good Practice Advice in Planning 2 (GPA2, July 2015). 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 and leading to substantial harm to the heritage asset. The proposal would intensify the harm already caused.

The Ministry of Housing, Communities and Local Government (MHCLG), Historic Environment Planning Practice Guidance (PPG, 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.

In determining this application duties under section 72 (Planning Listed Buildings and Conservation Areas) Act 1990 would need to be considered by the decision maker.

Conclusion: Objection - less than substantial

The proposal would be considered in principle unacceptable. From a historic environment perspective, it would be considered harmful to the character and appearance of the conservation area, failing to adequately preserve or enhance the conservation area.

Planning Officer Response: The comments raised by the Council's Conservation Officer in respect to the loss of the existing property at No.61 Long Lane and its current contribution to the Conservation Area have been duly noted. However, it is considered that refusing the application on this particular ground would be unsustainable in the event of an Appeal. Please refer to the section of the report titled 'Principle of Development' for further details. However, all the other points raised by the Conservation Officer in respect to the detrimental impact the proposed building would have to the character appearance of the street scene and the surrounding Conservation Area still stands.

6. Local Plan Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

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

Part 2 Policies:

DMEI 10	Water Management, Efficiency and Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 4	Residential Conversions and Redevelopment
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth

LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP HC1	(2021) Heritage conservation and growth
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF5	NPPF 2021 - Delivering a sufficient supply of homes
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

In addition: Development Plan:

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 West London Waste Plan (2015)
The London Plan (2021)

Material Considerations:

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

7. MAIN PLANNING ISSUES

7.1 Impact on the amenities of the occupiers of neighbouring residential properties

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that: B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Paragraph 5.38 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that: "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, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary."

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will 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."

Light, outlook and sense of enclosure:

No.59a Long Lane is a two-storey detached dwelling located immediately to the north of the application site. This neighbouring property has been extended by a two-storey rear extension (approved under application ref: 60316/APP/2006/104). The front building line of the proposed dwelling would be set behind that of No.59a Long Lane. It is therefore considered that the proposal would not result in a loss of outlook or light for the front elevation windows fitted in No.59a.

To the rear, the main wall of the proposed building would project beyond the first-floor windows at No.59a by 4.9 metres and 4.1 metres beyond this neighbour's ground floor rear windows. However, there would be a separation distance of approximately 5.6 metres between the closest flank wall of the proposed dwelling and the rear elevation windows at No.59a. The proposed site plan shows that a 45-degree line of sight (taken from the nearest habitable rear room window at No.59a) would not be breached. In addition to this, a Solar Study was submitted showing that the proposed building would not cause an unacceptable level of overshadowing for the property at No.59a and their associated rear garden space. Taking these factors into account, it is considered on balance that the proposed development would not unduly impact on the neighbouring occupiers at No.59a, in terms of light, outlook and sense of enclosure.

It is acknowledged that the proposed building would be positioned closer to the southern site boundary than the existing property at the site, and would be of greater depth, bulk and height. It is noted that there is a separation distance of more than 21 metres between the proposed building and the rear windows at Nos. 1 to 9 Edinburgh Drive (this figure includes the existing electricity substation adjoining the southern boundary of the application site). Bearing this mind, coupled with the orientation of these neighbouring properties and their northern aspect rear gardens, it is considered that the proposal would not cause an unacceptable loss of light to, outlook from or sense of enclosure for the occupiers at Nos. 1 to 9 Edinburgh Drive with respect to their dwellings, and largely their private amenity space. However, in respect to Nos. 1, 3 and some extent No. 5 Edinburgh Drive, there would be a harmful impact to outlook from and enjoyment of their rear gardens. Currently these properties experience an open and spacious outlook beyond

their rear boundaries out over the conservation area. Conversely, given the scale and depth of the building and its proximity to these rear boundaries, the development would appear visually intrusive and enclosing, adversely affecting the outlook from these gardens.

There would be a separation distance of at least 59 metres (approximately) between the proposed building and the front elevation windows at Nos. 45 to 61 Long Lane and No. 66 Long Lane. The rear elevation of the proposed building would be separated from the splayed mutual boundaries shared with Nos. 15 Edinburgh Close and 11 Edinburgh Drive by approximately 27 metres to 31 metres, respectively. Given these separation distances, it is considered that the proposal would adversely impact on the residential amenities of these neighbouring properties, in terms of light, outlook and sense of enclosure.

Overlooking and privacy:

The proposal includes rear balconies at first and second floor level. The proposed balconies would afford views into the gardens of the neighbouring properties at No. 59a Long Lane, Nos. 2 to 13 Edinburgh Drive and Nos.13 and 15 Edinburgh Close. Consequently, the proposed balconies would cause perceived and actual loss of privacy and overlooking to the detriment of the living conditions of neighbouring residential occupiers. The proposed privacy screens on the sides of the balconies would not mitigate this overlooking as a clear line of sight would be available from the front of the balconies.

Whilst it is noted that neighbouring gardens are already overlooked by first floor windows, due to the raised position of the proposed balconies the sense of an actual overlooking would be significantly amplified for neighbouring occupiers. Furthermore, the level of overlooking caused by the balconies would be more intrusive than experienced by first floor windows as it would involve future occupiers sitting out on raised platforms for extended periods of time.

In the event of an approval, a condition would have been secured requiring all the windows fitted in the side elevations of the proposed building to be obscure glazed and non-opening up to 1.8 metres of the finished floor level of the rooms they serve. Subject to this condition, it is considered that the proposed side windows would not give rise to an unacceptable loss of privacy or overlooking for neighbouring occupiers at Nos. 59a Long Lane and Nos. 1 to 5 Edinburgh Drive.

Given that the proposed side windows either serve bathrooms or secondary kitchen windows, it is considered that a condition of this nature would not prejudice the overall quality of internal accommodation afforded to future occupiers.

Noise, Disturbance and Pollution:

Whilst there would be some potential for increased levels of on-site activity to generate noise and disturbance, the site would nevertheless continue to be used in an exclusively residential capacity. The provision of proposed flats is not considered to lead to such a significant change in the local environment, in respect to noise light, dust and air pollution, to warrant a refusal on this basis.

Having regard to the above, it is considered that the proposed rear balconies would cause unacceptable harm to the living conditions of the neighbouring occupiers, in terms of loss of privacy and overlooking. The proposal therefore conflicts with Policy BE1 of the Hillingdon Local Plan: Part One- Strategic Policies (2012), Policy DMHB 11 of the

Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and paragraph 130 (f) of the NPPF (2021).

7.2 Impact on Street Scene

CHARACTER AND APPEARANCE:

In considering development affecting a Conservation Area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that local authorities shall pay special attention to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.

Paragraph 199 of the NPPF (2021) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 201 of the NPPF (2021) states:
Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
a) the nature of the heritage asset prevents all reasonable uses of the site; and
b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 202 of the NPPF (2021) states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

This is reinforced at a regional level, where Policy HC1 of the London Plan (2021) states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.

Policy BE1 of the Hillingdon Local Plan: Part One- Strategic Policies (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. Policy HE1 of the Hillingdon Local Plan: Part One- Strategic Policies (2012) states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.

Policy DMHB 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that the Council will expect development proposals to avoid harm to the historic environment. Policy DMHB 4 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that new development within a

Conservation Area 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.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that all development will be required to be designed to the highest standards and incorporate principles of good design. Policy DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development should be well integrated with the surrounding area.

The proposed building would measure approximately 19.7 metres wide (excluding the chimney stacks), 18.2 metres deep (at its deepest point) and 9 metres high. It is considered that the size, scale, massing and design of the building would result in an imposing and obstructive form of development which would appear out of keeping with the street scene on Long Lane and the setting of the surrounding Conservation Area. This harm would be exacerbated by the prominent position of the site where views of the proposed building would be readily visible from various public vantage points.

As highlighted by the Conservation Officer, the overall scale and bulk of the proposed development would be notably larger than the neighbouring properties, 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. The proposal would therefore be an incongruous, overly dominant building within the Conservation Area.

The proposed building would project significantly beyond the established rear building lines of the neighbouring properties in this section of Long Lane. As a result, the proposal would erode the rhythm and spacing between built form and open space and unacceptably undermine the urban grain of the local area. Also, the Council's Conservation Officer has stated that proposed rear depth of the development would have negative impact on how the conservation area is experienced within the private spaces associated to the respective neighbouring sites.

It is noted that the proposed building would have recesses along its side elevation. However, as highlighted by the Conservation Officer, the recesses do little to break up the overall mass of the development, which would still appear unacceptably boxy. The overall massing of the development is further exacerbated by the crown roof element. It is considered that the excessively large flat roof section would give rise to a bulky form of development to the detriment to the character of the street scene.

The Conservation Officer has commented that crown roofs are not a characteristic feature of the Ickenham Village Conservation Area. This argument is supported by the Inspector in the 2021 dismissed Appeal Decision relating to 60 Long Lane. This appeal case relates to the demolition of the existing dwelling and erection of a two-storey detached building with habitable roof space to provide 9 x 2-bed flats with associated amenity (Appeal ref: APP/R5510/W/20/3261227, LPA ref: 70282/APP/2020/2522). The Inspector states the following in respect to the proposed crown roof profile at No.60 Long Lane:

"The current appeal scheme proposes a very wide 2 storey rear element with a large crown roof and 3no second floor rear dormer windows, which would create a bulky and dominant feature to the rear of the building. The crude form of this element would not reflect the considered design approach of the front elevation, and it would appear out of keeping with the pitched roof forms and massing of neighbouring dwellings. I note that the block of flats at No 66 Long Lane features a crown roof, however, this is anomalous in the

are as the dwellings generally have modest ridge apex roofs. Whilst there would be limited views of the rear elevation in the street scene, it would nevertheless be visible from neighbouring dwellings and gardens with the CA. Furthermore, the lack of visibility from the public realm does not obviate the need to achieve good design."

Turning back to this current application, the proposed building would contain front dormers which would be in stark contrast with the plain front roof slopes found on neighbouring properties. Whilst it is recognised that the existing property has front dormers, these are positioned close to the eaves of the cat-slide roof. The proposed dormers would be positioned significantly higher within the roof slope than the existing dormers, thus exacerbating their harmful presence when viewed from the street scene. The proposed central flat roof dormer (including its balcony projection) is excessive in size and would appears as a highly conspicuous addition. Similarly, the proposed first floor rear balconies on stilts would result in a visually jarring form of development that pays little regard to the local context of the site. Due to their elevated position, the proposed rear dormers and first floor balconies would be readily visible from the views of first floor windows of neighbouring properties and their private rear garden space.

The Council's Conservation Officer has raised an objection, in principle, to the introduction of railings along the site frontage. The existing site frontages along Long Lane is predominately characterised by brick walls and mature hedges, which forms part of the established character and appearance of the surrounding Conservation Area. The proposed railings would therefore be completely out of keeping with the street scene on Long Lane, where it is noted that no other properties within the immediate vicinity of the site contains metal railings along their frontage.

In light of the above, it is considered that proposed development would cause significant harm to the character, appearance and visual amenities of the street scene and would fail to either preserve or enhance the significance of the Ickenham Village Conservation Area. The proposal therefore conflicts with Policies BE1 and HE1 of the Hillingdon Local Plan: Part One- Strategic Policies (2012), Policies DMHB 1, DMHB 4, DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy HC1, D1, D3 and D4 of the London Plan (2021) and the NPPF (2021).

The harm arising from the proposed development is considered to be less than substantial. In line with paragraph 202 of the NPPF (2021), the public benefit of the proposal must be weighed against the harm. (Please refer to the last section of this report for the 'planning balance' assessment).

TREES AND LANDSCAPING:

DMHB14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that 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.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires development proposals to protect features of positive value within and adjacent to the site and for landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

An Arboricultural Report, Implications Assessment and Method Statement was accompanied with this application. It states that the tree survey has shown that of the 8 trees and 4 groups of trees surveyed, 0 are Category A, 3 are Category B, 5 are Category C (plus), 4 are Category C and 0 are Category U.

The report states the following trees would need to be removed to facilitate the proposed development: Japanese maple (T1), Laburnum (T8) and Lawson Cypress (G1). These trees are Category C and are therefore considered to be of low visual amenity value. As such, the Council's Trees and Landscape Officer has raised no objection to the loss of these specific trees to enable the proposed development.

Paragraph 4.2.2 of the Arboricultural Report states that the relocation of the driveway to a central position would result in the need to remove/transplant a Cherry tree from the Highway verge. However, recent photographic evidence shows that this highway tree has since been removed. There is therefore no requirement for a replacement highway tree to be secured through a S.106 legal agreement.

Section 2.0 of the report states that construction works would be carried out under an arboriculturist supervision. The report includes a method statement and tree protection details to demonstrate that the health of the retained trees would not be impacted during the construction phases of the development and post-development. The Council's Trees and Landscape Officer has reviewed these details and is satisfied with the information that has been provided.

Paragraph 4.8.1 of the report states that the "The proposed flats are positioned to the west of the trees to the rear of the property so the habitable rooms remain unaffected by any undue shading from trees. Furthermore the communal amenity areas at the rear also receive good levels of light during the day and throughout the year." On this basis, it is considered unlikely that future occupiers would be harmed by overshadowing that could result in pressure to remove the retained trees.

Whilst the submitted drawings provide indicative details of the hard and soft landscaping, full details would have been secured by condition if this application had been recommended for approval. However, this is notwithstanding the issue raised above in respect to the proposed metal railings having a detrimental impact to the street scene and the setting of the Conservation Area. It is also worth noting that the height of the boundary treatment along the site frontage would need to be reduced to provide adequate visibility splays. Please refer to the section of the report titled 'Parking Provision' for further details.

7.3 Traffic Impact/Pedestrian Safety

Covered in the following section of this report.

7.4 Carparking & Layout

Paragraph 111 of the NPPF (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Policy DMT 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also, that impacts on local

amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing roads.

Policy DMT 5 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including the provision of cycle parking in accordance with Appendix C, Table 1 or, in agreement with the Council.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity.

PARKING PROVISION:

The site has a PTAL rating of 2 (poor) which therefore raises dependency on the ownership and use of private motor vehicle as a means of transport.

Appendix C, Table 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that 1- and 2-bedroom flats should be provided with 1 to 1.5 spaces. Based on this, the proposal for 4 x one-bedroom flats and 5 x two-bedrooms flats (including a penthouse) would require a maximum of 9 to 13.5 parking spaces. The proposal would provide 9 on-site car parking spaces (i.e., 1 space per flat), which would broadly conform to the Council's adopted Car Parking Standards. The Council's Highways Officer has raised no objection to the number of on-site car parking spaces.

If this application had been recommended for approval, a condition would have been secured requiring a parking allocation plan to be submitted to the Council. Also, a Construction Logistic Plan would have been secured by condition to minimise/avoid potential detriment to the public realm and local highway network.

On the above basis, it is considered that the proposal would not exacerbate the demand for street parking to such a significant extent that its effects would result in harm to highway safety or the efficient working of the local highway network.

VEHICLE ACCESS:

The proposed development would remove the two existing vehicle crossovers serving the site and these would be replaced by a new 'central' vehicle crossover on Long Lane. The Council's Highways Officer has raised no objection to the principle of the new vehicle crossover which allows for passenger vehicles using the site to enter and leave the site in forward gear.

The Highways Officer has requested for visibility splays of at least 2-3 metres at the back of the footway and on both sides of the proposed vehicle crossover with no obstructions exceeding 0.6 metres in this area. This is to provide inter-visibility sight-line requirements between vehicles leaving the site and vehicle and pedestrian road users on Long Lane.

The proposed front boundary treatment, comprising high level brick walls and railings, fails to provide adequate visibility splays. However, this could have been resolved by the imposition of a planning condition requiring the front boundary treatment to be reduced to a height of no more than 0.6 metres (in the event of an approval). This is notwithstanding the concerns raised by the Conservation Officer in respect to the harm caused to the character and appearance of the Conservation Area by the introduction of metal railings

along the site frontage.

The Highways Officer has advised that the proposed vehicular crossover must be facilitated at the applicant's expense and conform to the Council's maximum allowable width for crossing provisions stipulated within the Council's 'Domestic Vehicle Footway Crossover Standard'. Again, these matters would have been resolved by a suitably worded condition and a Section 184 legal agreement, had this application been recommended for approval.

TRIP GENERATION:

The Council's Highways Officer has commented that the proposal would increase traffic generation from the site as compared to the existing single dwelling unit. However, given that the scheme is for 9 dwellings, this uplift is considered marginal in generation terms and therefore can be absorbed within the local road network without notable detriment to traffic congestion and road safety.

ELECTRIC VEHICLE CHARGING POINTS:

Part G) of Policy T6 and part C) of Policy T6.1 of the London Plan (2021) states that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces. Accordingly, two car parking spaces should be provided with an active electric vehicle charging point and the remaining seven car parking spaces should be provided with passive electric vehicle charging infrastructure. If planning permission were to be granted, this would have been secured by condition.

ACCESSIBLE PARKING:

In accordance with the Accessible Hillingdon SPD, 10% of car parking spaces must be for blue badge holders (disabled users) which equates to 1 car parking space. The proposed site plan indicates 1 disabled parking space would be provided. However, in in the event of an approval, a condition would have been secured to ensure that this space measures 2.4 metres by 4.8 metres plus a shared 1.2 metres transfer zone - as detailed in the Council's Accessibility SPD.

BICYCLE PARKING:

Appendix C, Table 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires 1 cycle space per 1 or 2 bed unit. For the proposed development, this would equate to 9 spaces. The proposed site plan shows a cycle store in the communal rear garden with sufficient capacity to accommodate 9 cycles. There is no objection to the siting or capacity size of the cycle store. However, full details of the dimensions, external finish and design of the cycle store would be secured by condition, in the event of an approval.

Subject to the above condition, it is considered that the proposal would provide secure and accessible cycle parking spaces for future occupants in compliance with Policy DMT 5 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy T5 of the London Plan (2021).

REFUSE/RECYCLING COLLECTION:

Policy DMHB 11 part (d) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The Highways Officer has commented that the Council's 'waste collection' maximum distance collection parameter is 10 metres, i.e., the distance from a refuse vehicle to the point of collection.

The proposed site plan indicates that a refuse/recycling store would be provided to the side of the proposed building, adjacent to the northern site boundary. As presented, the proposed refuse/recycling store would exceed the '10 metre waste collection parameter'. Notwithstanding the Highways Officer's comments, it cannot be expected for future occupiers to move 1100 litre Eurobins to the kerbside on collection days. The refuse/recycle store would therefore need to be re-located within the '10 metre waste collection parameter' and this would have been secured by way of a condition, had this application been recommended for approval.

7.5 Urban Design, Access and Security Considerations

INTERNAL AMENITY SPACE PROVISION:

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating specific measures, which includes ensuring adequate defensible space is provided.

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. The space standards set out in Table 5.1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) are the same as those found in Table 3.1 of the London Plan (2021).

Policy D6 of the London Plan (2021) sets out the minimum internal floor space standards required for residential developments in order to ensure that there is an adequate level of amenity for future occupants. Table 3.1 of Policy D6 of the London Plan (2021) states that:
- A one storey dwelling with 1 bedroom, 2 person occupancy should provide a GIA of at least 50 square metres;
- A one storey dwelling with 2 bedrooms, 3 person occupancy should provide a GIA of at least 61 square metres;
- A one storey dwelling with 2 bedrooms, 4 person occupancy should provide a GIA of at least 70 square metres

The proposed development would provide the following:

Ground floor level:
Flat 1 - 1 bedroom, 2 person occupancy - 51 square metres
Flat 2 - 2 bedroom, 3 person occupancy- 71 square metres
Flat 3- 2 bedroom, 3 person occupancy- 71 square metres
Flat 4 - 1 bedroom, 2 person occupancy - 50.5 square metres

First floor level:
Flat 5- 1 bedroom, 2 person occupancy - 51 square metres
Flat 6 - 2 bedroom, 3 person occupancy- 71 square metres

Flat 7- 2 bedroom, 3 person occupancy- 71 square metres
Flat 8 - 1 bedroom, 2 person occupancy - 50.5 square metres

Second floor level:
Penthouse flat - 2 bedroom, 4 person occupancy - 106 square metres

The proposed floor plan for the penthouse flat shows a single bed space within its second bedroom. However, when measured, the overall floor space of this bedroom (including its built-in wardrobe) is 13.5 square metres. Based on paragraphs 10 d) and h) of the 'Technical housing standards - nationally described space standard', it is considered that the size of this bedroom would constitute as two bed spaces (or a double bedroom). The penthouse flat is therefore a 2-bedroom, 4-person unit and should be assessed as such.

As demonstrated above, all the proposed flats (including the penthouse flat) would meet the minimum space standard requirement set out in Policy D6 of the London Plan (2021). However, this is not the sole consideration when assessing the quality of internal accommodation. It is also necessary to assess the levels of light, outlook and privacy that would be afforded to future occupiers.

The proposed site plan shows that a footway leading to the main entrance of the building and the communal garden would be positioned directly in front of the main habitable room windows serving Flats 1 and 4. No soft landscaping or other measures is being proposed to provide adequate defensible space adjacent to the habitable windows of these ground floor flats. In the absence of such measures, the proposal would allow passer byes using the footway to have direct views into the bedrooms and open plan living/ dining and kitchens of Flats 1 and 4. This, in turn, would cause unacceptable overlooking and a loss of privacy (both real and perceived) for the future occupiers of these proposed flats.

According to the submitted plans, the dedicated external amenity space serving Flats 2 and 3 would be enclosed by 1.8 metre high boundary treatment positioned only 4.1 metres (at the closet point) from the main habitable room windows serving Flat 2 and 3. Such an arrangement, would be unacceptable as it would result in an oppressive and unwelcoming sense of confinement, and would fail to provide future occupiers of Flats 2 and 3 with an adequate degree of outlook and light.

If this application had been recommended for approval, a condition would have been secured requiring low level boundary treatment around the perimeter of dedicated amenity spaces for Flats 2 and 3. Whilst this would mean that these dedicated amenity spaces would not be private, it would ensure that the overall quality of internal amenity space afforded to the future occupiers of Flats 2 and 3 is acceptable in respect to outlook and light.

Having regard to the above, it is considered that the proposed development would fail to provide satisfactory internal living conditions for the future occupiers of Flats 1 and 4, in respect to privacy and overlooking. The proposal would therefore conflict Policies DMHB 15 and DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy D6 of the London Plan (2021).

EXTERNAL AMENITY SPACE PROVISION:

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Amenity space should be

provided in accordance with the standards set out in Table 5.3. Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. Table 5.3 states that:
-Studio and 1-bedroom flats should be provided with at least 20 square metres of private amenity space; and
-2-bedroom flats should be provided with at least 25 square metres of private amenity space

Paragraph 5.70 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states:
"Dwellings on upper floors should all have access to a private balcony or terrace, where this is consistent with the overall design of the building. Houses and ground floor flats should have private gardens. The Council is keen to improve the quality of housing in the Borough and therefore communal provision of private outdoor space is generally not supported unless there are strong planning reasons and the proposed scheme is of high quality with clear planning merits."

The proposed development would provide 4 x one-bedroom flats and 5 x two-bedroom flats, requiring 205 square metres of external amenity space in total.

Flats 2 and 3 would have direct access to dedicated external amenity space at the rear of the building measuring 40 square metres and 38 square metres, respectively. At first floor level, Flats 6 and 7 would have balconies measuring 5.4 square metres each. Although the penthouse flat would have a balcony measuring 4.7 square metres, its depth at 1.3 metres falls below the required 1.5 metre depth requirement set out Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). Flats 1, 4, 5 and 8 would not be afforded any private amenity space. However, all flats would have access to the communal amenity space which measures more than 700 square metres.

It is acknowledged that the proposed development would not be fully compliant with requirements of Table 5.3, in terms of private amenity space provision. However, it is considered that a balanced assessment should be applied in respect to the private amenity space provision afforded to flats, as per the recommendations of paragraph 5.70 of the Hillingdon Local Plan: Part 2 (2020). As stated in the previous section of this delegated report, the proposed balconies on the first and second floors are considered to be unacceptable on design grounds. It would therefore be inappropriate to require the proposed balconies to comply with the private amenity space standards of Table 5.3, as this would necessitate larger balconies which would not be supported by Officers. Also, the proposed 1.8 metre high boundary treatment around the perimeter of the dedicated amenity spaces for Flats 2 and 3 would be unacceptable on residential amenity grounds.

Overall, taking into account the proposed provision of private amenity space combined with a substantial amount of communal amenity space - which together would far exceed the total requirement of private amenity space set out in Table 5.3 of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) - it is considered that the development would provide ample outdoor space for future occupiers' health and wellbeing.

Accordingly, the proposed development would provide sufficient quantity and quality of external amenity space to serve the flats proposed, in accordance with the objectives of Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

INCLUSIVE DESIGN:

Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design. Policy D7 of the London Plan (2021) states that residential developments must ensure that: 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

The submitted plans show that the proposed building would contain a lift, which would provide wheelchair users access to all floors. If this application had been recommended for approval, a condition would have been secured to ensure that the lift is installed and is in operational use prior to the occupation of the development

The submitted Planning, Design and Access Statement states that all nine flats would meet the standards of Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. However, to comply with the requirements of Policy D7 of the London Plan (2021) one of the proposed flats would need to meet Category M4(3) and the remaining eight flats would need to meet Category M4(2) of the Building Regulations. This matter would have been resolved by the imposition of a condition, had this application been recommended for approval. Also, the condition recommended by the Council's Access Officer in respect to step free access would have been secured as well.

Subject to the above conditions, it is considered that the proposal would provide adequate provision of accessible and inclusively designed dwellings in compliance with Policies D5 and D7 of the London Plan (2021).

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7.6 Other Issues

PRINCIPLE OF DEVELOPMENT:

A) Loss of existing dwelling:

Policy DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will resist the loss of buildings that make a positive contribution to the character or appearance of the Conservation Area. Any such loss will need to be supported with robust justification.

There is an allowed Appeal Decision relating to No.60 Long Lane for a two-storey building comprising 7 flats (Appeal ref: APP/R5510/W/19/3221731, LPA ref: 70282/APP/2018/612). The loss of the existing dwelling at No.60 was considered by the Inspector in paragraph 6 and 6 of the Appeal Decision (refer below for the relevant extracts).

"5. In principle the Conservation Officer's concern, and thus one of the reasons for refusal, is based upon the loss of the existing dwelling.

6. From my site visit I note that there is no one overriding architectural theme in the immediate area. It is only the building line and property heights providing any real consistency. No.60 has been subject to a number of unattractive extensions to the front

and sides of the property. This has resulted in a lack of distinguishing features or style. I am not aware of any historical interest in the house itself which would warrant its retention and I concur that it has a lack of architectural merit, supported by the appellant's detailed assessment. With no up to date conservation area assessment I have no evidence before me that suggests the property makes a contribution to the overall character of the conservation area."

It is considered that the above Appeal Decision should be afforded a moderate degree of weight given its close proximity to the application site at No.61 Long Lane.

Turning back to this current application, the comments raised by the Council's Conservation Officer in respect to the loss of the existing property at No.61 Long Lane and its current contribution to the Conservation Area have been noted. However, it is considered that refusing this application on this ground would be unsustainable, in the event of an Appeal.

The existing property at No.61 Long Lane is not a statutory listed building, nor is it a locally listed building. Whilst it is agreed with the Council's Conservation Officer that the existing property exhibits attractive features, it is considered that this does not amount to the building being of such considerable importance to the Ickenham Village Conservation Area to warrant its protection from demolition. Over recent years, there has been a limited introduction of flatted developments on Long Lane, most notably at Nos. 66 and 88 Long Lane. These flatted developments would have required the demolition of the former dwellings, which should be taken into account as material consideration. It is therefore considered, on balance, that the demolition of the existing property is acceptable, in principle.

The impact the proposed development would have on the character and appearance of the area, with particular regard to the Ickenham Village Conservation Area is covered in section 7.2 of this delegated report. Please refer to the last section of this report for the planning balance assessment.

B) Need for Housing:

Policy DMH 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the net loss of existing self-contained housing will be resisted unless the housing is replaced with at least equivalent residential floorspace.

Policy DMH 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that residential conversions and the 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 into flats;
ii) On residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road for assessment purposes;
iii) the internal floor area of the original building to be converted is at least 120 sqm; and
iv) units are limited to one unit per floor for residential conversions.

Paragraph 4.11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that 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 the local character of the area. In recent years, large concentrations of flats have resulted in a range of problems, including increased on-street parking and resultant congestion on roads, the loss of front gardens, reductions in privacy, significant changes

to the street scene, and loss of family accommodation.

Based on a 1km survey of Long Lane, the proposed redevelopment of the application site into a block of flats would not result in more than 10% of properties being redeveloped into flats. The internal floor area of the original building exceeds 120 square metres, and the loss of its net residential floorspace would be replaced as part of the proposed development. Accordingly, the proposed development complies with Policies DMH 1 and DMH 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

There is no objection, in principle, to the creation of additional residential units in this location in land use terms. However, this would be subject to an appropriate housing mix, density, design, residential amenity and adequate parking provision, and the proposal being in accordance with all of the relevant planning policies and guidance set out in the Development Plan.

The Council is currently able to demonstrate a five-year supply of deliverable housing sites. As such, the "tilted balance" as set out in paragraph 11(d) of the NPPF (2021) is not engaged.

HOUSING MIX:

Policy H10 of the London Plan (2021) states that new development should consist of a range of unit sizes.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3 bedroom properties, as identified in the Strategic Housing Market Assessment 2016.

The proposal would involve the demolition of a five-bedroom dwelling, thus resulting in a net loss of a family sized unit (defined as a dwelling with three bedrooms or more in the London Plan). The proposed development would provide 4 x one-bedroom units and 5 x two-bedroom units. No three-bedroom units are being proposed, despite there being a need within the Borough for this particular housing type. No justification has been provided as to why the proposal fails to provide any three-bedroom units. The proposal would therefore fail to provide an appropriate housing mix which would undermine the Council's housing strategy and conflict with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021).

DENSITY:

Policy D3 of the London Plan (2021) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 of the London Plan (2021) which states that Boroughs should proactively support well-designed new homes on small sites below 0.25 hectares in size.

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2, which recommends a density range of 105-175 habitable rooms/hectare and 35-50 units/hectare for sites within 800m of a town centre with a PTAL rating of 2.

The site is located within 800m of a town centre and has a PTAL rating of 2. Based on a total site area of 0.16 hectares, the proposed scheme would have a density level of 144 habitable rooms/hectare and 56 units/hectare.
The proposed density levels fall within the recommended density range set out in Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

Notwithstanding the above, it is considered that what is of greater significance to the determination of this application is the local contextual factors. The key consideration is therefore whether the development would acceptably integrate with the character and appearance of the surrounding Conservation Area, and would respect residential amenity considerations, rather than the consideration of the density of the proposal. Please refer to the other sections of this delegated report which assesses these planning considerations in further detail.

ECOLOGY/PROTECTED SPECIES:

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.

Policy G6 of the London Plan (2021) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

A Bat Survey Report was accompanied with this application. The report states:
-The surveys of the site have confirmed that the house is a roost. The 2019 surveys identified a small maternity or satellite roost of brown long-eared bats with the presence of a pregnant female on 21st June and a likely juvenile bat on 12th August within the loft void. Additionally, the 2020 survey identified a small satellite roost for common pipistrelle in one of the dormers.
-Therefore, a Natural England development licence will be required for works to proceed. This will encompass a Mitigation Strategy to ensure that the development is designed to protect bats during the construction phase and to minimise long term impacts upon the local bat population.
-While no bats were recorded emerging from the garage, this building still has low potential for roosting bats and as such, the same methodology will be adopted for soft stripping both the house and garage, to ensure that if bats are present in the garage they will not be injured.
-The roof of the new apartment block and any associated outbuildings must not be lined with a modern breathable roofing membrane, it must have a traditional Bitumen Type 1F (with a hessian Matrix) roofing felt.

The Natural Environment and Rural Communities Act 2006 requires that "Every public

authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity." Damage or destruction of a breeding site would be an offence under the Conservation of Habitats and Species Regulations 2010 unless a Natural England European Protected Species licence is issued prior to commencement of works or confirmation is received from Natural England that the development would not require such a licence.

The Conservation of Habitats and Species Regulations 2017 (as amended) imposes a duty to consider relevant Directives and whether there is a reasonable likelihood of protected species being presented and affected by a proposal. When determining whether to grant a licence, Natural England must be satisfied that the following three tests have been met:
(a) Preserving public health or public safety or other imperative reasons of overriding public interest;
(b) There is no satisfactory alternative and
(c) The action will not be detrimental to maintaining the population of the species concerned at a favourable conservation status in its natural range.

Natural England is the licensing authority and licence applications are determined separately from the planning system. Notwithstanding this, as the proposed development could harm protected species, it is necessary to have regard to the three derogation tests and consider whether there is a reasonable prospect of a licence being issued.

With regards to the first test, the proposal would lead to some economic benefits. However, having regard to development plan policies, the proposal would be contrary to environmental policies designed to protect the character and appearance of the area and the surrounding Conservation Area. Furthermore, the proposal would be contrary to social planning policies, as the proposal would fail to provide an appropriate housing mix. Also, two of the proposed flats would provide future occupiers with substandard internal living conditions, due to lack of privacy and overlooking issue. It is therefore considered that the proposed development would not constitute as an "overriding public interest" given the conflict identified with the development plan.

With regards to the second test, the Council is currently able to demonstrate a five-year housing supply. There is therefore no immediate need to develop the application site. In addition to this, no evidence has been provided as to why alternative brownfield sites within the Borough could not be developed. The proposed development would therefore fail the second test.

With regard to the third test, the submitted Bat Survey states that a Mitigation Strategy would ensure that the proposed development is designed to protect bats. Whilst this may the case, the proposal fails to meet the other derogation tests and would have an adverse effect on ecology.

Consequently, it is considered that the proposal would cause harm to protected species (bats) and their habitats, contrary to Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy G6 of the London Plan (2021) and the NPPF (2021).

FLOODING AND DRAINAGE:

Policy SI 12 of the London Plan (2021) states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 of the London Plan (2021) states that development proposals should aim to achieve

greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused. Policy DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development within areas identified at risk from surface water flooding which fail to make adequate provision for the control and reduction of surface water runoff rates will be refused.

The site lies within Flood Zone 1 of the Environment Agency's Flood Risk Map. This means the site is classified as being at low risk and defined as having a less than 1 in 1,000 probability of fluvial and tidal flooding. As such, there are no restrictions on development, including more vulnerable uses such as Use Class C3 (dwellinghouses), in this location, in terms of fluvial and tidal flood risk.

The highway fronting the site is partially identified as being in an area of surface water flood risk. If planning permission was to be granted, a condition would have been secured requiring the submission of a sustainable water management scheme, that incorporates sustainable urban drainage systems (SuDs), to be submitted to the Council for consideration. Also, the landscaping condition would have been worded in such a manner to ensure that permeable hard surfacing is used for the front forecourt and parking area.

Subject to such conditions, it is considered that the proposed development would not increase the risk of flooding on the site or elsewhere in accordance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policies SI 12 and SI 13 of the London Plan (2021).

SUSTAINABILITY:

Policy SI 2 of the London Plan (2021) states that residential development should achieve at least a 10% improvement beyond Building Regulations 2013.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan targets.

The submitted Planning, Design and Access Statement and Energy Statement states that the proposed building would be designed to be an energy efficient development. The energy efficiency measures would include insulated roofs, walls and windows; high performance double glazed windows' ventilation to avoid condensation including MVHR to each flat and energy efficient light.

If this application had been recommended for approval, a condition would have been secured requiring the proposed building to achieve at least a 10% improvement beyond Building Regulations 2013. Also, a condition would have been secured requiring the proposed dwellings to achieve as a minimum, a water efficiency standard of no more than 105 litres per person per day maximum water consumption.

Subject to the above conditions, the proposal would be compliant with Policies DMEI 2 and DMEI 10 of the Hillingdon Local Plan: Part 2- Development Management Policies (2020) and Policy SI 2 of the London Plan (2021).

SECURE BY DESIGN:

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.

If planning permission were to be granted, a condition would have been secured requiring security measure details to be submitted to the Council. Subject to such a condition, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). However, this does not overcome the concerns raised in the previous section of the report in respect to the absence of any defensible space adjacent to the habitable room windows serving Flats 1 and 4.

COMMUNITY INFRASTRUCTURE LEVY:

The Council adopted its own Community Infrastructure Levy (CIL) on 1st August 2014. The Hillingdon CIL charge for residential developments is £95 per square metre of additional floor space. This is in addition to the Mayoral CIL charge of £60 per square metre. CIL rates are index linked. The proposal involves the erection of new dwellings and is therefore CIL liable if planning permission were to be granted.

PLANNING BALANCE:

Paragraph 202 of the NPPF (2021) states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

The proposal would contribute to the Council's delivery of housing and provide some economic benefits during the construction stages. However, the scheme is only for 9 private market flats, with two of the units affording future occupiers with substandard internal living conditions. Furthermore, the Council is currently able to demonstrate a five-year supply of deliverable housing sites. It is therefore considered that limited weight should be given to the proposals social and economic contribution. The significance of the setting of the Conservation Area would be greatly diminished as a result of the proposed development. Overall, the public benefits would not outweigh the 'less than substantial harm' to the designated heritage asset under the NPPF (2021).

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8. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
The London Plan (March 2021)
Technical Housing Standards - Nationally Described Space Standard (March 2015)
Hillingdon Local Plan Accessible Hillingdon Supplementary Planning Document (September 2017)
Planning Obligations Supplementary Planning Document (July 2014)
National Planning Policy Framework (July 2021)
The Natural Environment and Rural Communities Act 2006

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