

# Design & Access Statement

Erection of new dwelling with associated parking and landscaping + associated development following demolition of the existing dwelling  
(re-submission of 13583/APP/2023/3183)

212 Swakeleys Road, Ickenham, Hillingdon, UB10 8AY

## AUGUST 2024

(This document should be printed on A3)



## 1.0 INTRODUCTION

1.1 This Design and Access Statement has been prepared in the light of the provisions in Section 42 of the Planning and Compulsory Purchase Act 2004, regulations set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015 and good practice guidance outlined in *“Design and Access Statements: How to write, read and use them”* published by CABE.

1.2 The Statement has been prepared in support of a full application for planning permission for the erection of new dwelling with associated parking and landscaping + associated development following demolition of the existing dwelling (“the Proposed Development”) on site at 212 Swakeleys Road, Ickenham, Hillingdon, UB10 8AY (“the Application Site”). The application comprises the resubmission of an earlier application for the same character and description of development that was refused on 23<sup>rd</sup> January 2024 under application reference 13583/APP/2023/3183.

1.3 In addition to this **Design & Access Statement**, the application is informed and accompanied by the following plans and documents: -

- Application Form + Cert A
- Site Location Plan
- Existing Plans and Elevations
- Proposed Plans and Elevations + Visuals
- Floor Area and Footprint Comparison
- Landscape Masterplan
- Preliminary Ecological Appraisal & Preliminary Roost Assessment
- Ecological Mitigation, Enhancement and Management Plan
- Arboricultural Impact Assessment and Method Statement
- Energy & Sustainability Assessment
- Flood Risk Assessment & Drainage Strategy
- Fire Plan & Statement
- BNG Calculations



Proposed Front Elevation

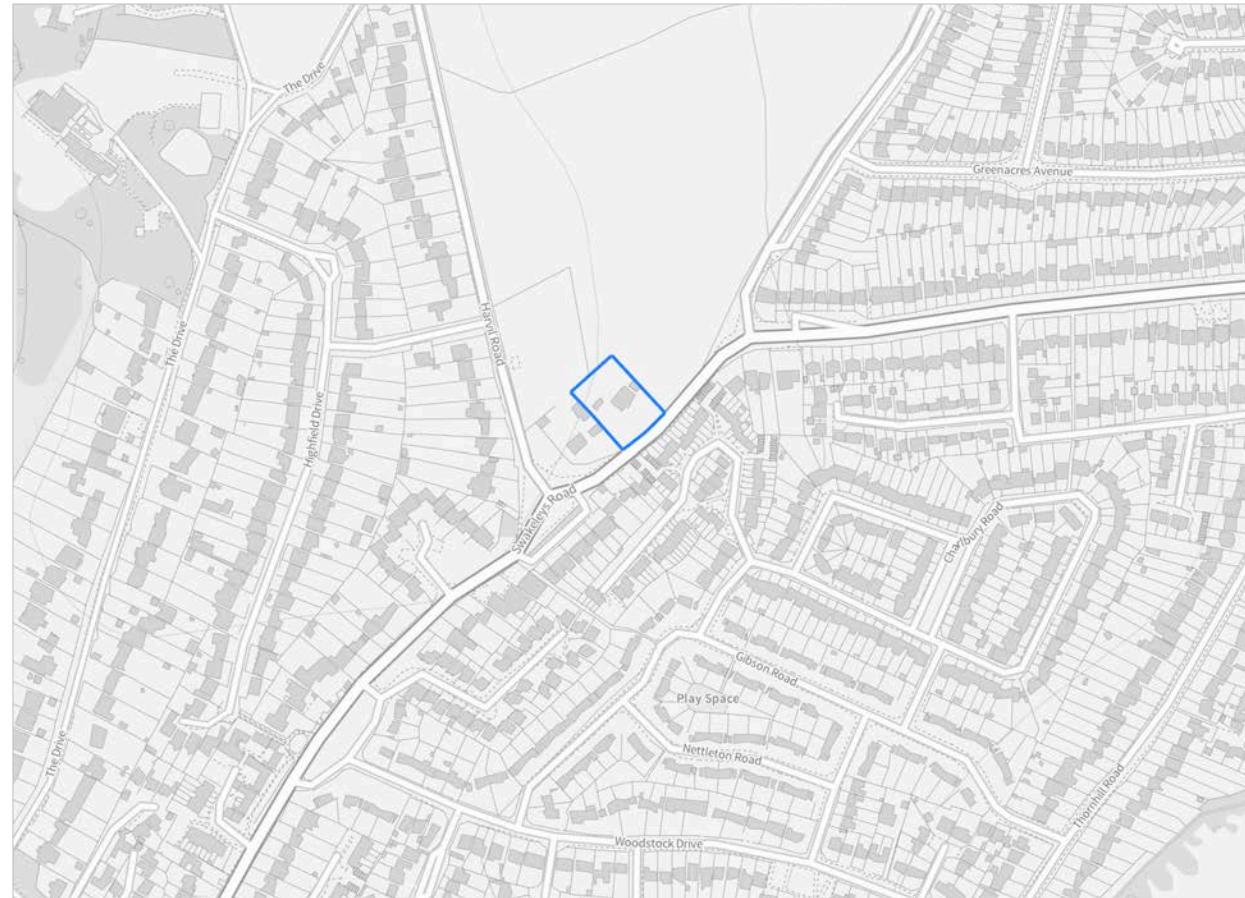
## 2.0 SITE

### *Physical Context*

2.1 The Application Site lies within the administrative jurisdiction of **London Borough of Hillingdon** which is the relevant Local Planning Authority (LPA) for the purposes of an application for planning permission for residential development in this area.

2.2 The site extends to 0.8 acres (0.32 hectares) and comprises a rectangular shaped plot of land situated on the northwest side of Swakeleys Road, approximately 30 metres northeast of its junction with Harvill Road. The site lies within a built-up, primarily residential area. The substantial plot is occupied by a large, detached, two-storey dwellinghouse with hipped roof and a flat roofed single storey rear extension extending across the full width of the house. Situated immediately adjacent to the dwellinghouse is a detached double garage with accommodation above, annexed to the host dwelling. The first floor accommodation above the garage is accessed via an external staircase. Both the host dwelling and the garage/annex are finished in white painted render beneath a Rosemary tiled roof. To the rear of the dwelling and garage/annex is a large, paved area. In addition, the plot is occupied by a swimming pool, 'pool house' and conservatory situated within the garden. The site is accessed directly from Swakeleys Road which has a tall boundary wall, also finished in white painted render, adjoining the footway. Close boarded timber fencing with occasional hedgerows completes the boundary treatment of the plot. The site is bounded by 218 Swakeleys Road to the southwest and agricultural land to the northeast and northwest.

2.3 The site is located within the Green Belt, where there are a number of nearby detached dwellings of a similar scale to the application property. The site is not the subject of heritage constraints. It is located in the Colne Valley Regional Park, the Hillingdon Air Quality Management Area, the A40 - Swakeleys Road Air Quality Focus Area, and has a Public Transport Accessibility Level (PTAL) of 1b.



2.4 In terms of public rights of way, Swakeleys Road and Harvill Road are public highways open to all forms of traffic. There are no public footpaths over the adjoining agricultural land to the northeast and northwest of the site. With regards to flood risk, no part of the site is within a fluvial flood risk zone or an area at risk of surface water flooding.

**Planning History**

2.5 There are two planning applications relating to the Application Site which are noteworthy.

2.6 **13583/P/93/0730** - The LPA **granted** planning permission on **20<sup>th</sup> July 1993** for change of use from private dwelling to nursing home, erection of a first floor rear extension and single storey side extension, provision of staff accommodation in roof and installation of two rear dormers. It appears that the permission was never implemented, and has long since lapsed.

2.7 **13583/APP/2023/3183** - The LPA **refused** planning permission on **23<sup>rd</sup> January 2024** for the erection of new dwelling with associated parking and landscaping following demolition of existing dwelling ("the Refused Scheme").

2.8 The reasons for refusal were as follows: -

1. *The proposed dwelling would not follow the existing character, appearance and architectural composition of the local area. Its elevational treatment, including large areas of glazing and a flat roof design, would have a modern appearance which would be completely out of keeping with the character, appearance and architectural composition of the site, the street scene and the local area. The proposal therefore conflicts with Policy D3 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policies DMEI 6 and DMHB 11 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020).*

2. *In overall terms the proposed development is considered to have greater impact on the openness of the Green Belt in terms of its width, depth and overall area, extending to being materially larger than the existing building and would therefore as currently presented as inappropriate development and contrary to the requirements of Policy DMEI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy G2 of the London Plan (2021) and Paragraph 148 of the NPPF. The resulting harm to the openness, in visual and spatial terms, is readily apparent and there are no very special circumstances.*

3. *In the absence of a full ecological assessment relevant to the description of development, the applicant has failed to demonstrate that the development would not affect ecology and biodiversity. The development therefore conflicts with Policy DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and Policy G6 of the London Plan (2021).*

4. *No development approved by this permission shall be commenced until a scheme for the provision of sustainable water management has been submitted to and approved in writing by the Local Planning Authority.*

2.9 In justifying the refusal of planning permission, the Case Officer (Daniel Ambrose) made the following salient points in the Delegated Report: -

*"The site is located within the Green Belt, where there are a number of nearby detached dwellings of a similar scale to the south-west of the application property. The site is not the subject of heritage policies, is located in the Colne Valley Regional Park, the Hillingdon Air Quality Management Area, the A40 - Swakeleys Road Air Quality Focus Area, Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) of 1b.*

*This part of Swakeleys Road comprises individually designed properties in large spacious plots that are set well back from the*

public highway. The proposed dwelling would be set back [from] the public highway and set in generously from both side boundaries.

In terms of the overall design and appearance of the proposed dwelling with a flat roof, it is considered that it would not harmonise with the local context or be in keeping with the character, appearance and architectural composition of the existing and surrounding dwellings. The site is located on a highly visible part of Swakeleys Road, approximately 30m north-east of its junction with Harvill Road. The houses in the local area are mainly modest, two storey houses built in the 1930s with traditional hipped roofs, front gable and mock Tudor detailing. Opposite the site are a number of smaller, two storey houses that were built much later. It would appear from the street scene that whilst there are a number of housing styles, they generally follow a similar form and traditional 1930s design.

The proposed dwelling would not follow the existing character, appearance and architectural composition of the local area. Its elevational treatment, including large areas of glazing and a flat roof design, would have a modern appearance which would be completely out of keeping with the character, appearance and architectural composition of the site, the street scene and the local area. The Council recognises that this is a large site containing a large, detached, two-storey dwelling with outbuildings and a swimming pool and as such there may be some scope for a development that is more unique on the site. However, the proposed design is not considered to be the right approach. The proposed development would be contrary to the requirements of Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and could not be supported by the Council.



Refused Scheme: January 2024

**It is considered that any new dwelling should be a modern interpretation of the traditional 1930s design** that is prevalent in the area and should reflect the existing characteristics of the site.

*It is proposed to erect a two-storey dwelling, involving the demolition of an existing dwelling, outbuildings and swimming pool, which would under normal circumstances be acceptable in principle. Given that the site is within the Green Belt the policy test to apply is whether the proposed dwelling would meet the requirements of Policy DMEI 4, Part B (alongside and provided it is consistent with paragraph 149 of the NPPF) as above.*

*In terms of its overall footprint, the proposed dwelling would be approximately 40 sqm of an increase compared the existing buildings (plural) it would replace. However, in terms of its overall floorspace, the proposed dwelling would be less than the existing buildings, as is acknowledged in the Design and Access Statement. That being a 55sqm decrease.*

*As shown on the submitted Area Comparison drawing the existing dwelling and outbuildings have a combined footprint of approximately 310sqm and a total floor area of about 605sqm. The proposed dwelling would have a footprint of approximately 350sqm and total floor area of about 550sqm. On that basis, the proposed dwelling would represent an increase in footprint.*

*It is also proposed to utilise the footprint of ancillary structures which currently have significantly less impact upon the openness of the Green Belt than the proposed, two storey dwelling with a footprint of approximately 350sqm. The proposed dwelling would extend across much of the width of the plot at two storeys unlike the current arrangement where there is a visual gap between the main house and the ancillary guest building.*

*Although the flat roof of the proposed dwelling would be lower than the ridge of the existing dwelling hipped roof, the increase in the footprint and eaves height of the proposed dwelling would be materially over and above the existing buildings it would replace, more so when measured against the original dwelling.*

*Because the NPPF does not specify what would constitute 'materially larger', it is a matter of fact and degree. The Oxford definition of materially is "in a significant way; considerably". Other past appeal decisions have stated that it would not be sufficient to rely only on built volume when considering spatial impacts. Other physical dimensions such as floor space, footprint, height, or width are relevant.*

*In overall terms the proposed development is considered to have greater impact on the openness of the Green Belt in terms of its width, depth and overall area, extending to being materially larger than the existing building and would therefore as currently presented as inappropriate development and contrary to the requirements of Policy DMEI 4 of the Hillingdon Local Plan: Part 2 – Development Management Policies (2020), Policy G2 of the London Plan (2021) and Paragraph 148 of the NPPF. The resulting harm to the openness, in visual and spatial terms, is readily apparent and there are no very special circumstances."*

### 3.0 THE PROPOSAL

3.1 Planning permission is sought for the erection of new dwelling with associated parking and landscaping + associated development following demolition of the existing dwelling ("the Proposed Development") on site at 212 Swakeleys Road, Ickenham, Hillingdon, UB10 8AY ("the Application Site").

3.2 The application comprises the resubmission of an earlier application for the same character and description of development that was refused on 23<sup>rd</sup> January 2024 under application reference 13583/APP/2023/3183. The submitted scheme has sought to address each of the four reasons for refusal of the Refused Scheme and Hughes Planning has been commissioned to direct the revised proposals.

3.3 Key amongst the revisions to the proposal is a complete redesign of the proposed replacement dwelling, having regard to the Council's views in relation to the previous design, and a reduction in its footprint, height, size and scale to ensure that the proposed new dwelling can no longer be deemed to be materially larger than the dwelling to be replaced.

3.4 In addition, the application is accompanied by a full ecological assessment and BNG Calculations, and a water management and drainage strategy specifically intended to address reasons for refusal numbers 3 and 4 and recent changes to planning legislation.

3.5 The landscape proposals for the site have also been reconsidered and enhanced as part of the revised proposals. The scheme now embraces the replacement of the existing front boundary masonry wall with a new native hedgerow, set back from the footway behind a narrow grass verge, both to enhance visibility for vehicles upon exit from the site and to enhance the character and appearance of the site in views from Swakeleys Road, blending in with the boundary treatments of adjacent land and properties.



## 4.0 PLANNING POLICY FRAMEWORK

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of applications under the Planning Acts should be in accordance with the development plan unless material considerations indicate otherwise.

4.2 In this case, the relevant documents that currently have **development plan** status include The London Plan (March 2021), Hillingdon Local Plan Part 1 (Strategic Policies) (November 2012), Hillingdon Local Plan Part 2 (Development Management Policies) (January 2020) and Hillingdon Local Plan Part 2 (Site Allocations and Designations) (January 2020). A key **material policy consideration** is the latest iteration of the National Planning Policy Framework (NPPF, December 2023).

4.3 For the purposes of the development plan, the Application Site lies within the broader confines of Ickenham and within Green Belt. The site is located in the Colne Valley Regional Park, the Hillingdon Air Quality Management Area, the A40 - Swakeleys Road Air Quality Focus Area, Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) of 1b. The existing dwelling is of limited architectural interest and of no heritage value. The site is not within a conservation area and there are no nearby listed buildings.

### DEVELOPMENT PLAN

4.4 Relevant policies of the development plan are set out below and expanded upon in the following section of this Design and Access Statement.

#### The London Plan (March 2021)

4.5 The “London Plan 2021”, which sets out the Mayor's overarching strategic planning framework for the next 20 - 25 years, was adopted on 2<sup>nd</sup> March 2021. The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental,

transport and social framework for the development of the capital to 2050. It forms part of the development plan for Greater London and is recognised in the NPPF as being part of the development plan.

- Policy GG4 (Delivering the Homes Londoner's Need)
- Policy D3 (Optimising Site Capacity through Design-led Approach)
- Policy D4 (Delivering Good Design)
- Policy D5 (Inclusive Design)
- Policy D6 (Housing Quality and Standards)
- Policy D7 (Accessible Housing)
- Policy H2 (Small Sites)
- Policy H10 (Housing Size Mix)
- Policy G1 (Green Infrastructure)
- Policy G2 (London's Green Belt)
- Policy G6 (Biodiversity and Access to Nature)
- Policy G7 (Trees and Woodlands)
- Policy SI 12 (Flood Risk Management)
- Policy T6.1 (Residential Parking)

#### Hillingdon Local Plan Part 1 (Strategic Policies) (November 2012)

4.6 The “Hillingdon Local Plan Part 1 2012” is the key strategic planning document for Hillingdon and will support the delivery of the spatial elements of the Sustainable Community Strategy. It sets out the long-term vision and objectives for the Borough, what is going to happen, where, and how this will be achieved.

- Policy NPPF1 (National Planning Policy Framework - Presumption in Favour of Sustainable Development)
- Policy BE1 (Built Environment)
- Policy EM1 (Climate Change Adaptation and Mitigation)
- Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains)

**Hillingdon Local Plan Part 2 (Development Management Policies)  
(January 2020)**

4.7 The “Hillingdon Local Plan Part 2 Development Management Policies 2020” forms part of the development plan. Its purpose is to provide detailed policies that will form the basis of the Council’s decisions on individual planning applications.

- Policy DMH 1 (Safeguarding Existing Housing)
- Policy DMH 2 (Housing Mix)
- Policy DMHB 11 (Design of New Development)
- Policy DMHB 12 (Streets and Public Realm)
- Policy DMHB 14 (Trees and Landscaping)
- Policy DMHB 16 (Housing Standards)
- Policy DMHB 17 (Residential Density)
- Policy DMHB 18 (Private Outdoor Amenity Space)
- Policy DMEI 2 (Reducing Carbon Emissions)
- Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land)
- Policy DMEI 7 (Biodiversity Protection and Enhancement)
- Policy DMEI 9 (Management of Flood Risk)
- Policy DMEI 10 (Water Management, Efficiency and Quality)
- Policy DMT 1 (Managing Transport Impacts)
- Policy DMT 2 (Highway Impacts)
- Policy DMT 5 (Pedestrians and Cyclists)
- Policy DMT 6 (Vehicle Parking)

**Hillingdon Local Plan Part 2 (Site Allocations and Designations)  
(January 2020)**

4.8 This Site Allocations and Designations document sets out sites for development to meet the Borough’s needs to 2026, based on the level of growth and general locations set out in the Local Plan Part 1. The allocation of development sites forms part of a strategic approach to guiding and managing growth in the Borough. It promotes development and the flexible use of land, whilst allowing for general development principles, such as scale, access, and

quantum of development, to be agreed on strategic sites. There are no relevant policies in this Local Plan.

**OTHER MATERIAL POLICY CONSIDERATIONS**

**National Planning Policy Framework 2023**

4.9 The latest National Planning Policy Framework (NPPF) was published by the Conservative Government in December 2023 and sets out the government’s policies on planning. The NPPF is an important material consideration in the assessment of all development proposals. The NPPF (December 2023) is the sixth iteration of the Government’s national planning policy framework.

4.10 At paragraph 2, the NPPF advises that planning law requires applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

4.11 At paragraphs 7, 8 and 9, the NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of new homes. There are three objectives to sustainable development - economic, social, and environmental. These overarching objectives are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged.

4.12 Paragraphs 10 and 11 set out a presumption in favour of sustainable development. Decisions on planning applications should apply a presumption in favour of sustainable development. For decision taking this means either approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which

are most important for determining the application are out-of-date, granting permission unless: (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

4.13 With regards to design, the NPPF advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Planning decisions should ensure that developments: (a) will function well and add to the overall quality of the area; (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

4.14 The Government's policy approach to development in the Green Belt is set out in section 13 of the NPPF. The Government attaches "great importance" to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. In Green Belt terms, development effectively falls into one of two types: development that is inappropriate in Green Belt and development that is not inappropriate (or to put it in more simple terms, development that is inappropriate and development that is appropriate). Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in "very special circumstances".

4.15 The purposes of including land in Green Belt are: (i) to check the unrestricted sprawl of large built-up areas; (ii) to prevent neighbouring towns merging into one another; (iii) to assist in safeguarding the countryside from encroachment; (iv) to preserve the setting and special character of historic towns; and (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

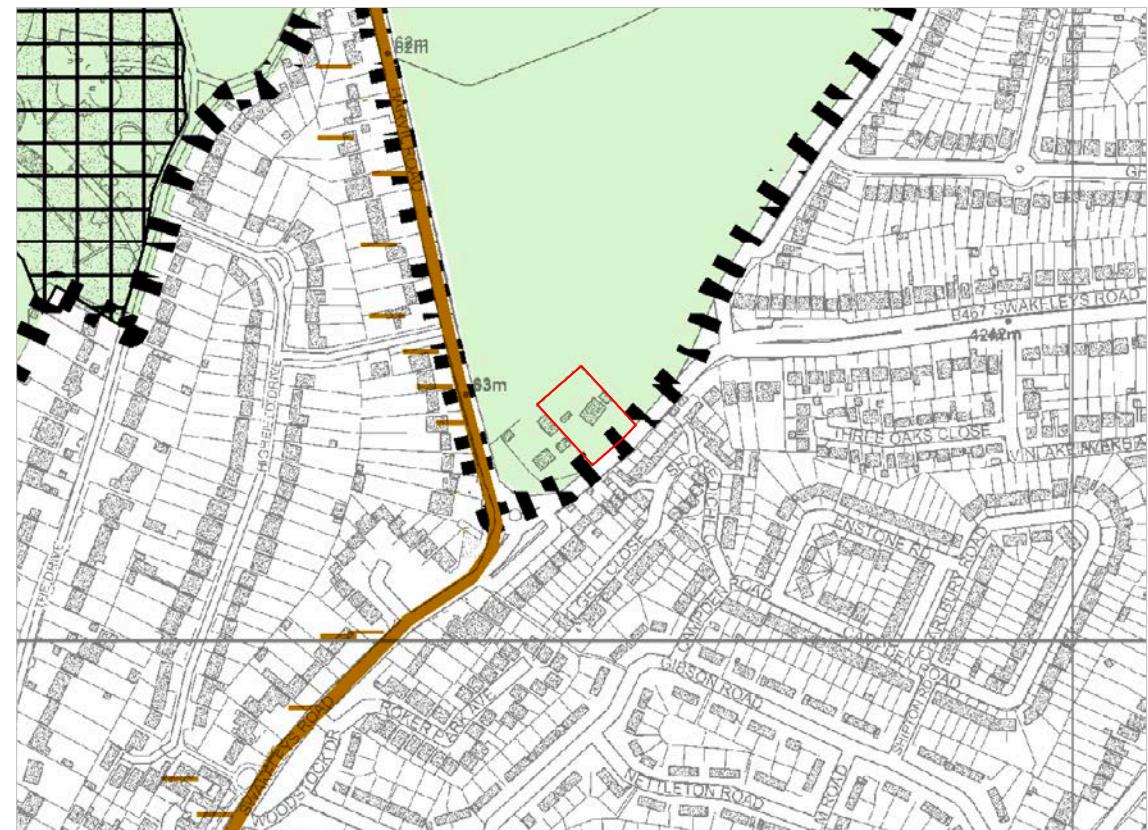
4.16 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of Green Belts, such as retaining and enhancing landscapes, visual amenity, and biodiversity; and improving damaged and derelict land.

4.17 A local planning authority should regard the construction of all new buildings as inappropriate development in Green Belt. Exceptions to this are set out in the NPPF. They include the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; and the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development.

4.18 The Government's planning policies on meeting the challenge of climate change is set out in section 14 of the NPPF. The planning system should support the transition to a low carbon future in a changing climate. New development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. In determining planning applications, local planning authorities should expect new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

4.19 The Government's planning policies on the conservation and enhancement of the natural environment is set out in section 15 of the NPPF. We are advised that the planning system should contribute to and enhance the natural and local environment by: (a) protecting and enhancing valued landscapes and sites of biodiversity or geological value in a manner commensurate with their statutory

status or identified quality in the development plan; (b) recognising the intrinsic character and beauty of the countryside, including the best and most versatile agricultural land, trees and woodland; and (d) minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks.



Local Plan Policies Map

## 5.0 ASSESSMENT

5.1 This application seeks planning permission for the erection of new dwelling with associated parking and landscaping + associated development following demolition of the existing dwelling ("the Proposed Development") on site at 212 Swakeleys Road, Ickenham, Hillingdon, UB10 8AY ("the Application Site").

5.2 The reasons for refusal of the Refused Scheme (**13583/APP/2023/3183**) have played a crucial part in the redesign of the Proposed Development and therefore, where appropriate, this Statement explains how and in what ways the Proposed Development has overcome the concerns raised in respect of the previous submission by the Local Planning Authority (LPA).

5.3 Having regard to the nature and scale of the Proposed Development, the **main issues** for consideration of this planning application are as follows:

- (i) *Principle of development,*
- (ii) *Green Belt Considerations,*
- (iii) *Design, and effect upon the character and appearance of the area,*
- (iv) *Effect on residential amenity,*
- (v) *Effect on access, parking, and highway safety, and*
- (vi) *Effect on nature conservation interests.*

### The Principle of Development

5.4 Policy **DMH 1 (Safeguarding Existing Housing)** states that the net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace. The proposal embraces the one for one replacement of the existing dwelling, with a floor area of comparable size. The LPA has previously accepted that the principle of the development is acceptable in planning policy terms, subject to the scheme's compliance with other parts of the development plan, which we discuss below.

### Green Belt Considerations

5.5 The Application Site is located within a built-up, primarily residential, area and located within Green Belt.

5.6 The Government's policy approach to development in the Green Belt is set out in section 13 of the NPPF (December 2023). The Government attaches "great importance" to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. In Green Belt terms, development effectively falls into one of two types: development that is inappropriate in Green Belt and development that is not inappropriate (or to put it in more simple terms, development that is inappropriate and development that is appropriate). Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in "very special circumstances".

5.7 The purposes of including land in Green Belt are: (i) to check the unrestricted sprawl of large built-up areas; (ii) to prevent neighbouring towns merging into one another; (iii) to assist in safeguarding the countryside from encroachment; (iv) to preserve the setting and special character of historic towns; and (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.8 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of Green Belts, such as retaining and **enhancing landscapes, visual amenity, and biodiversity**; and **improving** damaged and derelict **land**.

5.9 The NPPF advises local planning authorities that they should regard the construction of all new buildings as inappropriate development in Green Belt. There are however **exceptions**, as set out in paragraph 154 of the NPPF and within paragraph 6.18 of the Hillingdon Local Plan Part 2 (2020). This includes exception **d**) the replacement of a building,

provided the new building is in the same use and not materially larger than the one it replaces, and exception g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development.

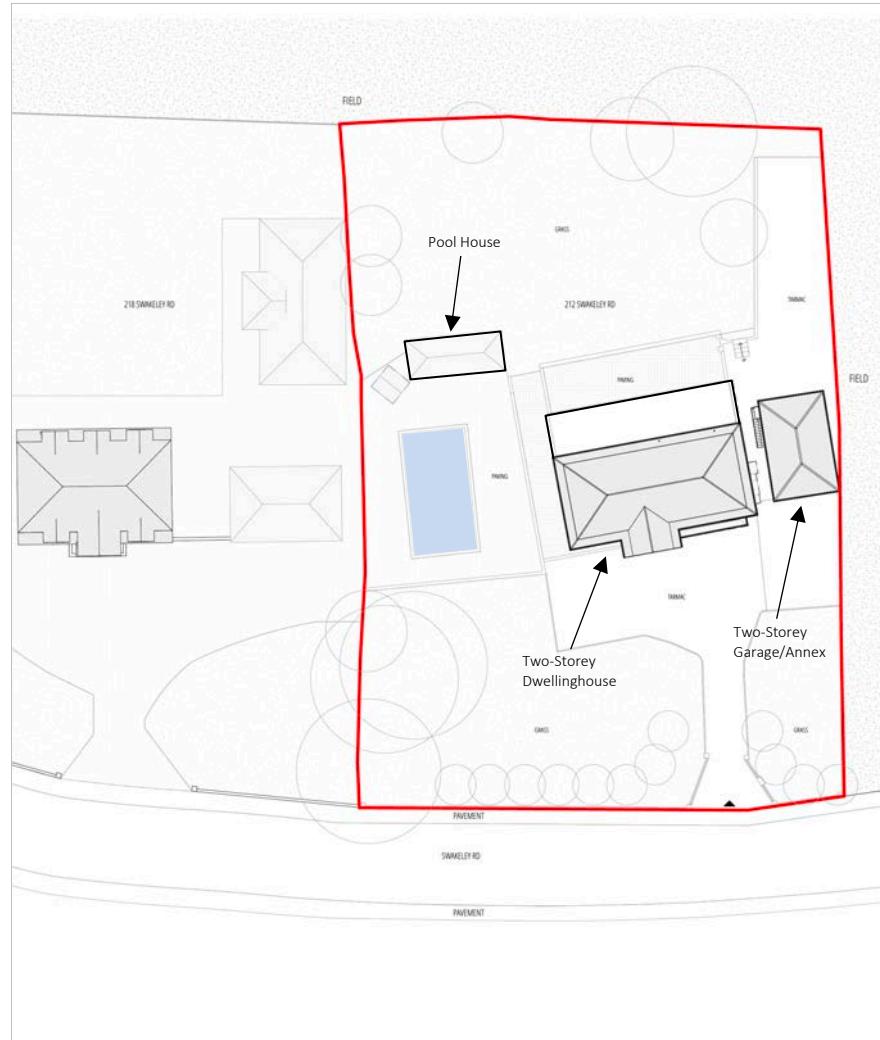
5.10 The guidance in the NPPF is supported by Policy **G2 (London's Green Belt)** of the London Plan (2021) which states that the Green Belt should be protected from inappropriate development and development proposals that would harm the Green Belt should be refused except where very special circumstances exist.

5.11 Policy **EM2 (Green Belt, Metropolitan Open Land and Green Chains)** of the Hillingdon Local Plan Part 1 (2012) states that the Council will seek to maintain the current extent of the Green Belt and any proposals for development in the Green Belt will be assessed against national and London Plan policies.

5.12 Policy **DMEI 4 (Development in the Green Belt or on Metropolitan Open Land)** of the Hillingdon Local Plan Part 2 (2020) states that inappropriate development in the Green Belt (and Metropolitan Open Land) will not be permitted unless there are very special circumstances.

The redevelopment of sites in the Green Belt will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and the purposes of including land within it, than the existing development, having regard to the following: -

- i. the height and bulk of the existing building on the site,
- ii. the proportion of the site that is already developed,
- iii. the footprint, distribution and character of the existing buildings on the site,
- iv. the relationship of the proposal with any development on the site that is to be retained, and
- v. the visual amenity and character of the Green Belt.



Existing Site Plan

Existing Site Photos



5.13 The Application Site comprises a substantial plot that is occupied by a large, detached, **two-storey above ground** dwellinghouse with hipped roof and a flat roofed single storey rear extension extending across the full width of the house. Situated immediately adjacent to the dwellinghouse (to the northeast) is a detached double garage with accommodation above, annexed to the host dwelling. The first-floor accommodation above the garage is accessed via an external staircase. Both the host dwelling and the garage/annex are finished in white painted render beneath a Rosemary tiled roof. To the rear of the dwelling and garage/annex is a large, paved area. In addition, the plot is occupied by a swimming pool, 'pool house' and conservatory situated within the garden, sat within a walled enclosure. The site is accessed directly from Swakeleys Road which has a tall boundary wall, also finished in white painted render, adjoining the footway.

5.14 The existing and proposed footprints and floor areas are shown on the 'Area Comparison' plan (**dwg no. 1942 A99 P1**) submitted to accompany the application. Since the refusal of planning permission for the Refused Scheme, the existing buildings on site have been resurveyed to ensure the starting point for the comparative size analysis is accurate. This has revealed the full extent of the basement. The submitted scheme does not embrace a basement and therefore by way of a comparison, only the above ground floor areas are included in the comparative figures.

5.15 Having regard to the figures opposite, the combined footprint of the existing buildings on the site is 360m<sup>2</sup>. In comparison, the footprint of the proposed dwelling + car port is 350m<sup>2</sup>. This represents a reduction in footprint of built development of -10m<sup>2</sup>.

5.16 The ground floor area of built development currently extends to 360m<sup>2</sup>, and the first-floor area is 220m<sup>2</sup>. This provides a total floor area of 580m<sup>2</sup>. In comparison, the ground floor area of the proposed dwelling + car port is 350m<sup>2</sup> and the first-floor area is 210m<sup>2</sup>. This provides a total floor area of 560m<sup>2</sup>. This represents a reduction in floor area of -20m<sup>2</sup>.

5.17 Thus, by way of comparison of these key indicators of scale, the Proposed Development would result in an overall reduction in built form.

#### Existing Footprint

Dwelling- 250m<sup>2</sup>  
Garage/Annex- 60m<sup>2</sup>  
Pool House- 50m<sup>2</sup>

Total Footprint = 360m<sup>2</sup>

#### Proposed Footprint

Dwelling- 320m<sup>2</sup>  
Car Port- 30m<sup>2</sup>

Total Footprint = 350m<sup>2</sup>

#### Existing Floor Area

Dwelling- 250 + 160 = 410m<sup>2</sup>  
Garage/Annex- 60 + 60 = 120m<sup>2</sup>  
Pool House- 50m<sup>2</sup>

Total Floor Area = 580m<sup>2</sup>

#### Proposed Floor Area

Dwelling- 320 + 210 = 530m<sup>2</sup>  
Car Port- 30m<sup>2</sup>

Total Floor Area = 560m<sup>2</sup>

5.18 As noted in the Planning Officer's Delegated Report in relation to the Refused Scheme, there are other notable indicators of scale which must be assessed.

5.19 Whilst of an entirely different design, the ridge line of the proposed dwelling is the same as the existing dwelling. The proposed dwelling embraces a hipped roof, in keeping with the existing dwelling, and this has significantly reduced its overall bulk relative to the Refused Scheme which had a flat roof. The eaves line is also now no higher than the existing dwelling and falls below the eaves line of the garage/annex on its northeast and southwest flank elevations. The existing detached garage/annex is to be demolished and some of its massing is incorporated into the proposed dwelling. This results in a narrower footprint of built development across the width of the site, particularly when viewed from the road, and a corresponding increase in the openness of the site, particularly noticeable in the area between the proposed dwelling and the northeast site boundary.

5.20 Other notable indicators are that the general ratio of ground floor to first floor built development remain similar to the existing scenario with the replication of a single storey element to the rear of the dwelling. The proposed dwelling has a deeper plan form than the existing dwelling, but the cat slide roofs on either side of the dwelling contribute significantly to reducing bulk and massing. The increase in the depth of the dwelling would be largely imperceptible from the road frontage, and in any event, it has been demonstrated (above) that the proposed dwelling would result in an overall reduction of footprint and floor area compared to the existing dwelling.

5.21 The proposed car port is a practical feature of the scheme, situated to the right-hand side of the dwelling on the approach along the driveway to avoid impeding views of the dwelling from the access. The existing pool house will be demolished as part of the scheme such that there will be a reduction in the scale of outbuildings within this part of the site. The proposed layout rationalises the use of space within the site and creates a more spacious and attractive plot which the dwelling will inhabit.



Proposed Front Elevation

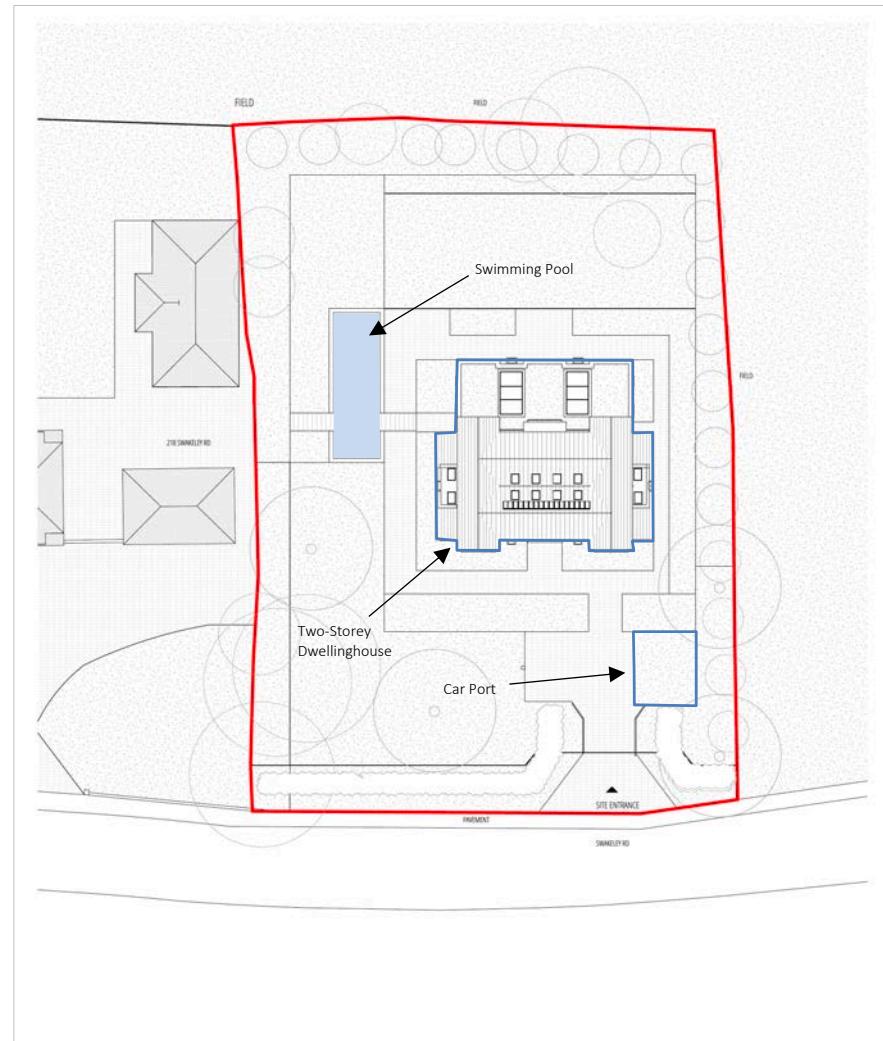


Proposed Rear Elevation

5.22 Having regard to the planning policy framework set out above, neither the NPPF nor the development plan set specific limits as to the size and scale of new dwellings that will be permissible in replacement of existing dwellings. The policy requirement is simply that the replacement building is not materially larger than the one it replaces. This introduces an element of subjectivity. That said, it is clear from the above that the proposed dwelling is not materially larger than the existing dwelling + associated buildings being demolished, and there would in fact be an overall reduction in footprint and floor area of built development compared to the existing scenario. Further, the consolidation of built form and the rationalisation of open space will further enhance the perception of the openness of the site, with an increase in spaciousness around the dwelling, achieved in part by removing the two-storey garage/annex which is situated very close to the site's northeast boundary.

5.23 In overall terms, the Proposed Development would not have any greater impact upon the openness of the Green Belt in terms of its height, size and scale over and above the existing dwelling and outbuildings to be demolished.

5.24 Having regard to the considerations set out in Policy DME1 4 (Development in the Green Belt or on Metropolitan Open Land), the proposed dwelling is no higher than the existing dwelling and there would be a -20m<sup>2</sup> reduction in floor area. There would be a reduction in the proportion of the site that is already developed, with a corresponding increase in openness and spaciousness. There would be a -10m<sup>2</sup> reduction in built footprint. The proposal consolidates built form within the site with a reduction in the spread of built development across the site and more greenery. The dwelling is of a different design to the existing dwelling but retains a 1930s style and its replacement is desirable. The relationship of the proposed dwelling to the only near neighbour is retained. The removal of the front boundary wall and replacement with a new native hedgerow, set behind a grass verge, will greatly enhance the character and appearance of the site, particularly when viewed from Swakeleys Road, and in turn enhance the visual amenity of the Green Belt.



Proposed Site Plan

5.25 Accordingly, the Proposed Development is not materially larger than that to be replaced and it would have no greater impact on the openness of the Green Belt than the existing development. The proposal therefore accords with the guidance in paragraph 154 of the NPPF which sets out specific exceptions for built development in the Green Belt as being for the replacement of existing buildings or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development. The proposal accords with both exceptions and therefore accords with the advice in the NPPF.

5.26 For these same reasons, the proposal accords with the objectives of Policy G2 (London's Green Belt) of the London Plan (2021) which states that the Green Belt should be protected from inappropriate development, Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of the Hillingdon Local Plan Part 1 (2012) which requires proposals to be assessed against national and London Plan policies, and Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) of the Hillingdon Local Plan Part 2 (2020) which is permissive of the redevelopment of sites in the Green Belt where the proposal would not have a greater impact on the openness of the Green Belt and the purposes of including land within it, than the existing development, having regard to the height and bulk of the existing building on the site, the proportion of the site that is already developed, the footprint, distribution and character of the existing buildings on the site, the relationship of the proposal with any development on the site that is to be retained, and the visual amenity and character of the Green Belt.

#### **Design, Character and Appearance**

5.27 The NPPF (December 2023) promotes an effective use of land in meeting the need for new homes, while safeguarding and improving the environment. Proposals should be sympathetic to local character and history, including the surrounding built environment, but appropriate innovation or change should not be discouraged. It is clear there is no requirement or expectation in the framework to copy existing styles of

development, although proposals should be sympathetic to their surroundings.

5.28 Paragraph 139 of the NPPF notes the importance of achieving design which is appropriate to its context stating that '*Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design taking into account any local design guidance and supplementary planning documents such as design guides and codes.*'

5.29 Policy D3 of the London Plan (2021) states, *inter alia*, that "*development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.*"

5.30 Policy BE1 of the Hillingdon Local Plan Part One (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.

5.31 Policy DMEI 6 of the Hillingdon Local Plan Part 2 (2020) advises that new development adjacent to the countryside should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

5.32 Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020) advises that all development will be required to be designed to the highest standards and incorporate principles of good design. It should take into account aspects including the scale of the development considering the height, mass and bulk of adjacent structures; building plot sizes and established street patterns; building lines and streetscape rhythm and landscaping. It should also not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

5.33 The Application Site is located on a highly visible part of Swakeleys Road, approximately 30m north-east of its junction with Harvill Road. The

houses in the local area are mainly modest, two storey houses built in the 1930s with traditional hipped roofs, front gable and mock Tudor detailing. Opposite the site are a number of smaller, two storey houses that were built much later.

#### *The Refused Scheme*

5.34 Having regard to the Refused Scheme, the Case Officer (Daniel Ambrose) was of the opinion that the dwelling as previously proposed would not follow the existing character, appearance, and architectural composition of the local area. It was considered that its elevational treatment, including large areas of glazing and a flat roof design, would have a modern appearance which would be completely out of keeping with the character, appearance and architectural composition of the site, the street scene, and the local area. The Officer recognised that this is a large site containing a large, detached, two-storey dwelling with outbuildings and a swimming pool and as such that there may be some scope for a development that is more unique on the site. However, it was considered that the proposed design was not the right approach and that any new dwelling should be a modern interpretation of the traditional 1930s design that is prevalent in the area and should reflect the existing characteristics of the site.

5.35 These views were reiterated in the Council's pre-application response to a draft proposal for the replacement of the existing dwelling with a new dwelling, issued under application reference 13583/PRC/2023/64.

#### *The Proposed Scheme*

5.36 The articulation of the dwelling is an important consideration, and the existing dwelling benefits from single and two storey projections, a strong eaves line, some architectural detailing and a hipped roof. The proposed design reflects these design features, which is positive, and the overall architectural approach is more closely related to the Arts and Crafts Movement, features of which some of the nearby properties exhibit. However, as indicated by the Case Officer who dealt with the Refused Scheme, the Application Site is large containing a large,

detached, two-storey dwelling with outbuildings and a swimming pool and as such there is scope for it to accommodate a new development that is more unique, and in my opinion of much higher architectural quality.

5.37 The proposed design embraces a significant amount of articulation so as to avoid a monolithic appearance. Protrusions and extrusions, deep eaves and architectural detailing all contribute to the high quality of design and assist in breaking up the massing of the building. The front elevation has a double gable with prominent chimney stacks and regular pattern of fenestration, having regard to the golden ratio which follows the 'Fibonacci' sequence. Its height and massing, whilst not dissimilar to the existing dwelling, is reduced through the use of cat slide roofs to the flank elevations, carefully punctuated with modern dormers to provide more head height and space for the first floor en-suite bathrooms. The central doorway is oversized with glazing either side to provide daylight and sunlight into the hallway and passive surveillance of the front garden.

5.38 With regards to siting, the location of the replacement dwelling is broadly within the footprint of the existing dwelling which mitigates any perceived effects upon the openness of the site. As commented above, moving the built form away from the northeast boundary of the site through the demolition of the garage/annex is a positive element of the scheme and it enhances spaciousness around the dwelling. The new outdoor swimming pool will also be broadly in the same location as the existing pool, screened in views from the road and from the neighbour by sensitive native hedgerow planting. The pool connects directly to the house via an integrated path which negates any need for a pool house.

5.39 In terms of materiality, the existing white render is not particularly successful and as it weathers it becomes less attractive and a continual maintenance liability. The white rendered wall enclosing the site along the footway adjoining Swakeleys Road is a detracting feature in the streetscene and in the Green Belt, and its replacement with a new native hedgerow connecting to the existing hedgerow to the northeast will be much more desirable.



5.40 The proposals also represent a clear enhancement to the streetscene and to the character and appearance of the local area, including the amenity value of the Green Belt. It provides a more attractive setting for the house and a more enjoyable outlook from the house.

5.41 With regards to the landscape proposals, there is ample opportunity to achieve the 10% (minimum) net gain in biodiversity that is now required of all new developments, and the removal of the hardstandings around the swimming pool and hard boundary enclosures within the garden are all positive elements embraced within the proposal that will enhance the openness of the Green Belt and the character and quality of the site and its contribution to the surrounding area.

5.42 The dwelling as now proposed is a modern interpretation of the traditional 1930s design that is prevalent in the area and reflects and better reveals the existing characteristics of the site. The proposal therefore accords with the design objectives of Policy D3 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan Part 1 (2012), and policies DMEI 6 and DMHB 11 of the Hillingdon Local Plan Part 2 (2020) insofar as the proposed dwelling follows the existing character, appearance and architectural composition of the site and local area, its elevational treatment, including articulation, protrusions and extrusions, deep eaves and architectural detailing, it represents a design which is akin to the Arts and Crafts vernacular and which is entirely in keeping with the character, appearance and architectural composition of the site, the street scene and the local area, whilst avoiding unnecessary replication which may otherwise stifle creativity and innovation.

#### **Residential Amenity**

5.43 Policy DMHB 11 (Design of New Development) of the Hillingdon Local Plan Part 2 (2020) advises that development should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. Buildings should avoid being over dominant from neighbouring properties and normally a minimum 15m separation distance should be maintained between habitable room windows and elevations of two or more storeys (taken from a 45 degree splay from the centre of habitable

room windows). Where habitable room windows face each other, a minimum 21m distance is required to safeguard privacy. This also applies to an area of private amenity space or patio, normally taken to be the 3m depth of rear garden immediately adjoining the rear elevation of a residential property.

5.44 The proposed dwelling would be sited approximately 20m from the southwest boundary of the site adjacent to the only adjoining neighbour (No. 218 Swakeleys Road). There are no first-floor windows proposed in the side elevation facing 218 Swakeleys Road. By virtue of the separation distance, it is considered that the proposed dwelling would not result in loss of privacy, daylight and sunlight to the adjacent property. It would reflect the front building line with the sole neighbouring property.

5.45 The proposal is for the one for one replacement of an existing dwelling. The proposed new outdoor swimming pool is in a similar location to the existing swimming pool. It is also proposed to screen the boundaries of the site with new native hedgerows.

5.46 Consequently, it is considered that the proposal is compliant with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020) in relation to the protection of residential amenity.

#### **Parking, Access, and Highway Safety**

5.47 The Application Site is located within a primarily residential area and is occupied by a dwelling and outbuildings with generous established on-site parking provision to the front. The existing dwelling is proposed to be demolished and replaced with a new dwelling (one for one). The new dwelling would continue to have parking to the front of the property, benefitting from a proposed new garage situated to the right-hand side of the driveway as one approaches the property from Swakeleys Road.

5.48 The address exhibits a public transport accessibility level (PTAL) rating of 1b which is considered as 'very poor' and as such heightens the dependency on private car ownership and usage and the public roadway is devoid of parking restrictions.

5.49 Policy DMT 6 (Vehicle Parking) of the Hillingdon Local Plan Part 2 (2020) states that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

5.50 Policy T6.1 (Residential Parking) of the London Plan (2021) requires that new residential development should not exceed the maximum parking standards as set out in table 10.3 of the London Plan.

5.51 The maximum requirement for a 3 bedroom 'plus' dwelling as per the overriding regional standard demands up to 1.5 spaces.

5.52 The proposal embraces a car port with space to park two vehicles + bicycles with an additional two parking spaces situated opposite. Although such provision technically exceeds the parking standard, it is considered acceptable in this specific case as it reduces the potential for untoward on-street parking displacement onto the very heavily trafficked and unrestricted neighbouring local roadways resulting from the higher dependency on the private motor car due to the very poor PTAL rating.

5.53 The proposed internal parking layout conforms to best practice design standards (DfT (Manual for Streets (MfS) circa 2007) for new development road and parking layouts as there is adequate turning space to allow for passenger vehicles using the site to enter and leave the plot in a forward gear which is recommended practice on safety grounds. As presented, this requirement is achieved.

5.54 In line with the London Plan (2021), within the final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. The Applicant can confirm that 2 'active' spaces are to be provided which is compliant with the said requirement.



Proposed Access & Parking





5.56 Policies DMT 1 (Managing Transport Impacts) and DMT 2 (Highway Impacts) of the Local Plan Part 2 (2020) require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

5.57 There will be no discernible difference in vehicle bound activity as compared to the scale and single tenure of the existing dwelling (which will remain for the replacement build) hence any generated activity can therefore be readily absorbed within the local road network without notable detriment to traffic congestion and road safety.

5.58 There is one carriageway crossing (cc) emerging onto Swakeleys Road that serves the existing dwelling. This is to remain and is considered fit for purpose.

5.59 In safety terms, there should be conformity to the relevant mutual intervisibility sight-line requirements between vehicles leaving the site and extraneous vehicles/pedestrians on the neighbouring highly trafficked roadway. The scheme now embraces the replacement of the existing front boundary masonry wall with a new native hedgerow, set back from the footway behind a narrow grass verge, both to enhance visibility for vehicles exiting the site and also to enhance the character and appearance of the site, particularly in views from Swakeleys Road, blending in with the boundary treatments of adjacent land and properties.

5.60 Refuse collection will continue via Swakeleys Road as is the case at present. In order to conform to accepted 'waste collection distances' from the public highway, the bin storage point should be positioned within 10m of a refuse vehicle. A bin storage area is not indicated but it can be assumed that the occupier/s will continue an informal arrangement by placing their refuse within the 10m distance parameter if they wish for their refuse to be collected.

5.61 It has previously been indicated that a full and detailed Construction Management Plan (CMP) will be a requirement given the constraints and sensitivities of the local road network in order to avoid/minimise potential detriment to the public realm. This to be secured post-permission via planning condition.

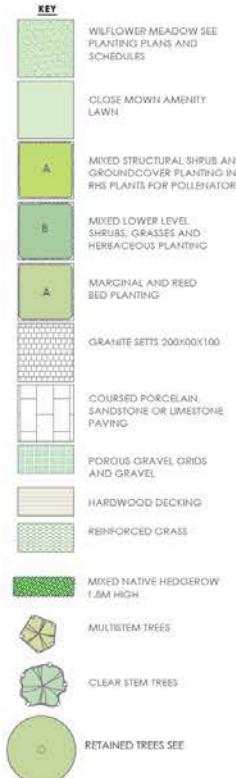
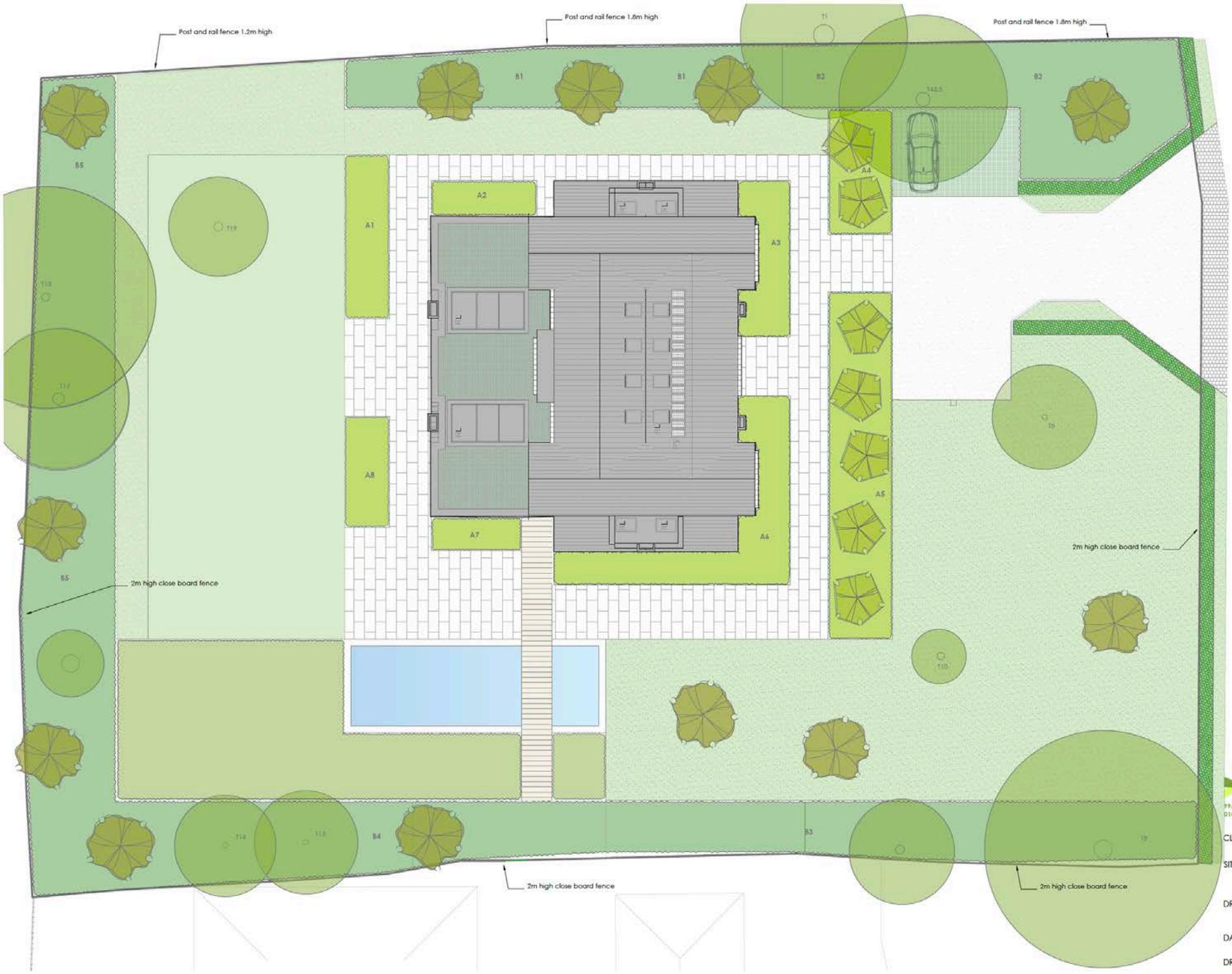
5.62 For the above reasons, it is submitted that the proposal is satisfactory in terms of parking, access and highway safety, and therefore accords with the transport objectives of Policy T6.1 (Residential Parking) of the London Plan (2021), and policies DMT 1 (Managing Transport Impacts), DMT 2 (Highway Impacts) and DMT 6 (Vehicle Parking) of the Hillingdon Local Plan Part 2 (2020).

#### Effects on Nature Conservation Interests

5.63 The Government's planning policies on the conservation and enhancement of the natural environment is set out in section 15 of the NPPF (December 2023). We are advised that the planning system should contribute to and enhance the natural and local environment, including by minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks.<sup>1</sup>

5.64 Policy G6 (Biodiversity and Access to Nature) 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. Policy G7 (Trees and Woodlands) of the London Plan (2021) states that development proposals should ensure that, wherever possible, existing trees of value are retained, and if planning permission is granted that necessitates the removal of trees there should be adequate replacement. Similar objectives are sought by policies DMHB 14 (Trees and Landscaping) and DMEI 7 (Biodiversity Protection and Enhancement) of the Hillingdon Local Plan Part 2 (2020).

<sup>1</sup> Paragraph 170 of the NPPF 2023



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CLIENT	C/O JJ STUDIO	REVISIONS
SITE	212 SWALEEYS RD	ICENHAM
DRAWING	OUTLINE LANDSCAPE PLAN	
DATE	15-7-24	
DRWG NR	LC-2971-01	
SCALE	1:100 A1	
ISSUE	PLANNING	

5.65 Policy DMEI 7 of the Hillingdon Local Plan Part 2 (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.

*Landscape Masterplan*

5.66 The application is accompanied by a **Landscape Design Masterplan** prepared by Landscape Connection with the specific objective of enhancing the setting of the proposed dwelling, and its ecological, biodiversity and visual amenity value. The key landscape proposals are as follows: -

- **Entrance** - Visibility splays widened to improve safety. Granite sett margin acts as demarcation zone. Stabilised porous gravel within grid upon entering driveway. Wildflower verges introduced.
- **Boundary white rendered wall removed** - Mixed native hedge and wildflower verge.
- Mixed native hedge maintained at 1.5-2m wide and 2-3m high. 2m high closeboard fence to sit behind this wall for privacy.
- Small/Medium height multi stem trees set within prairie inspired planting (e.g. Ornamental grasses and herbaceous flowering mixes) for movement. Trees help to reduce visual dominance of building. Tree species include the RHS high pollinating *Prunus serrula* with its deep red bark, and the contrasting white *Betula jacquemontii*.
- **The Orchard** - Wildflower meadow with fruit trees eg mix of apples. Mown verges.

- Native buffer planting to eastern boundary maintained at heights of 5 - 7m to reduce visual dominance of building.
- Improved and rejuvenated buffer planting to boundary. Native species to be introduced. Heights of 5-7m to reduce visual dominance of building.
- Natural swimming pool set within reeds/marginal planting. Timber boardwalk included.
- High pollinating defensible shrub and herbaceous planting to building.
- Car port with biodiverse green roof. Open sides. 2 car spaces underneath.

*Ecology*

5.67 The application is informed and accompanied by a **Preliminary Ecological Appraisal and Preliminary Roost Assessment** (May 2024) prepared by Arbtech. The findings of the report are set out in Table 8 of the submitted report, along with a series of recommendations, as follows: -

**Designated Sites** – none.

**Habitats and flora** - The following habitat creation and enhancement opportunities could be incorporated into the Proposed Development – (i) Native tree, hedgerow and shrub planting; (ii) planting of a wildflower meadow; and (iii) creation of a wildlife pond.

**Amphibians** - none.

**Reptiles** - The following habitat creation and enhancement opportunities could be incorporated into the Proposed Development which would be beneficial for reptiles – (i) Creation of reptile refugia and hibernacula using debris and brash from site clearance; (ii)

planting of native scrub and grassland to increase foraging opportunities; (iii) the creation of basking areas such as rock piles or areas of cleared ground with shelter nearby; and (iv) the creation of a wildlife pond.

**Roosting bats** - The installation of two bat boxes at the site will provide additional roosting habitat for bats.

**Foraging and commuting bats** - The following habitat creation and enhancement opportunities could be incorporated into the Proposed Development which would be beneficial for foraging bats – (i) The creation of a wildlife pond; and (ii) planting of native tree, shrub and hedgerows to increase foraging opportunities.

**Badger** - none.

**Hazel Dormouse** - none.

**Hedgehog** - The following habitat creation and enhancement opportunities could be incorporated into the Proposed Development to provide additional opportunities for hedgehogs on site – (i) Native tree, hedgerow and shrub planting; (ii) creation of wildflower grassland; and (iii) creation of a new pond.

**Riparian Mammals** - none.

**Birds** - The installation of two bird boxes at the site will provide additional nesting habitat for birds. The bird boxes will be installed on scattered trees onsite. General purpose bird boxes should be positioned 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Species-specific bird boxes should be installed in line with manufacturers specifications.

**Invertebrates** - none.

### Trees

5.68 The application is informed and accompanied by an ***Arboricultural Impact Assessment and Method Statement*** (July 2024) prepared by Cantia Arboricultural Services. The findings of the arboricultural survey are set out in section 4.0 of the submitted report and are summarised as follows: -

- The proposal requires the removal of 1 x Category U tree.
- Specialised techniques will be employed where demolition and hard surfaced areas are scheduled for removal within the measured RPA of trees marked for retention.
- Root pruning will be employed where there is a very small conflict between the design and measured RPA of T06 Turkey Oak marked for retention.
- So long as the precautionary and protective measures outlined within the report are strictly observed and adhered to then the Proposed Development will have neutral impact upon trees marked for retention.

5.69 Subject to the imposition of suitably worded condition(s) to ensure that the recommendations set out in the Ecology Appraisal and Tree Survey are secured, the proposal would not give rise to any concerns relating to ecology and biodiversity and the proposal would secure a net biodiversity gain. Accordingly, the proposals would further the objectives as set out in the NPPF, policies G6 (Biodiversity and Access to Nature) and G7 (Trees and Woodlands) of the London Plan (2021); and policies DMHB 14 (Trees and Landscaping) and DMEI 7 (Biodiversity Protection and Enhancement) of the Hillingdon Local Plan Part 2 (2020) as they relate to nature conservation interests.

## Other Considerations

### Urban Design, Access and Security Considerations

5.70 Policy DMHB 16 (Housing Standards) of the Hillingdon Local Plan Part 2 (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this, all residential development should meet or exceed the most up to date internal space standards, as set out in Table 5.1 of the Local Plan.

**Table 5.1: Minimum Floorspace Standards (National Space Standards)**

Number of bedrooms	Number of bed spaces	Minimum Gross Internal Area (m <sup>2</sup> )			Built-in storage (m <sup>2</sup> )
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		
	4p	70	79		2.0
3b	4p	74	84	90	
	5p	86	93	99	2.5
	6p	95	102	108	
4b	5p	90	97	103	
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

5.71 The proposal significantly exceeds the minimum standards.

5.72 Policy DMHB 18 (Private Outdoor Amenity Space) of the Hillingdon Local Plan Part 2 (2020) states that all new residential development 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 5.2 of the Local Plan. A four plus

bedroom dwelling is required to provide 100 square metres which the proposal significantly exceeds. The proposed dwelling would provide internal space along with amenity space significantly in excess of the Council's minimum standards.

### Energy, Sustainable Design & Construction

5.73 Policy D5 (Inclusive Design) of the London Plan (2021) requires an inclusive design approach whilst Policy D6 (Housing Quality and Standards) seeks to ensure that sufficient daylight and sunlight is provided in new developments, avoids overheating and minimises overshadowing.

5.74 Policies BE1 (Built Environment) and EM1 (Climate Change Adaptation and Mitigation) of the Hillingdon Local Plan Part 1 (2012) seeks to maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions by amongst other things, promoting new development to contribute to the upgrading of existing housing stock where appropriate.

5.75 Policy DMHB 11 (Design of New Development) of the Hillingdon Local Plan Part 2 (2020) seeks to ensure that the internal design and layout of development maximises sustainability and is adaptable to different activities; whilst Policy DMEI 2 (Reducing Carbon Emissions) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

5.76 The existing dwelling and outbuildings were constructed at a time when considerations relating to energy efficiency and mitigating for and adapting to a changing climate were not widespread. The proposed dwelling would be constructed to modern day building regulations standards and the proposal would involve very high quality materials and finishes, exceeding standards in certain quarters.

5.77 The application is accompanied by a *Sustainable Strategy* and *Seasonal Energy Solution* and *Energy and Sustainability Assessment* (June 2024) which set out the sustainable design and construction strategy for the dwelling.

5.78 Having regard to the submitted *Energy and Sustainability Assessment*, the energy hierarchy has been adopted to follow a Be Lean, Be Clean, Be Green methodology. The preferred energy strategy is to reduce energy demand for the dwelling and consequently the amount of conditioning and renewable energy contribution needed. This starts with a fabric first approach to improve thermal elements and controlled fittings. The feasibility of CHP systems and decentralised energy networks have been considered within the Be Clean case.

5.79 The final Be Green improvements have additionally explored the adoption and effect of adding renewable energy. The most appropriate renewable energy source has been identified as solar photovoltaic (located on the roof of the dwelling) which produce a carbon saving over the baseline emissions to achieve carbon zero in regulated Co<sub>2</sub>. The calculations provided, draw upon the detailed SAP 2013 assessment. This gives as accurate a guide as possible to the energy usage of the final development in operation.

5.80 The energy assessment sets out to meet the requirements of national and local policies with regard to energy conservation in dwellings, reductions in global climate change gas emissions and the use of renewable technologies to meet energy demand. In particular, this meets the requirements of the London Plan and its implementation by Hillingdon Borough Council.

5.81 The building CO<sub>2</sub> emissions for the development have been calculated to be reduced by average 40.3% beyond current Building Regulation. This has been achieved through energy efficiency measures, using improved building fabric, increasing the efficiency of the building services and finally the installation of a renewable energy source. The Clean total energy requirements and carbon dioxide emissions have been calculated taking full account of all regulated emissions (space & hot water heating, and electricity for pumps, fans, lights). The Lean calculations was determined by using the orientation and the use of building elements (walls, windows etc.) with U-values consistent with achieving compliance with Approved Document Part L1A.

5.82 Having regard to the above, the objectives of policies D5 (Inclusive Design) and D6 (Housing Quality and Standards) of the London Plan (2021); policies BE1 (Built Environment) and EM1 (Climate Change Adaptation and Mitigation) of the Hillingdon Local Plan Part 1 (2012); and policies DMHB 11 (Design of New Development) and Policy DMEI 2 (Reducing Carbon Emissions) of the Hillingdon Local Plan Part 2 (2020) are met in relation to tackling and adapting to climate change and reducing emissions.

*Flooding and Drainage*

5.83 Policy SI 12 (Flood Risk Management) of the London Plan (2021) and policies DMEI 9 (Management of Flood Risk) and DMEI 10 (Water Management, Efficiency and Quality) of the Hillingdon Local Plan Part 2 (2020) seek to direct development away from areas at risk of flooding and to ensure that developments do not increase the likelihood of the site flooding or leading to flooding elsewhere.

5.84 The fourth reason for refusal of the Refused Scheme stated that "*No development approved by this permission shall be commenced until a scheme for the provision of sustainable water management has been submitted to and approved in writing by the Local Planning Authority.*" This was expressed as a condition rather than a reason for refusal, but the Applicant has taken the opportunity in this resubmission to address the issue of drainage.

5.85 The application is accompanied by a *Flood Risk Assessment & Drainage Strategy* prepared by John Davies Associates who were commissioned to undertake a Flood Risk Assessment (FRA) and Drainage Strategy in relation to the Proposed Development.

5.86 The Application Site falls into Flood Zone 1 and has a low risk of flooding from rivers and watercourses. The Proposed Development is at a very low risk of flooding from surface water. The Proposed Development is not at risk from groundwater or reservoirs.

5.87 The sequential test was undertaken, and it was deemed that the exception test was not required for the site. The surface water drainage is proposed to connect into the public sewers via existing connections on site at a controlled rate of 1.4 l/s, all the surface water will drain through the permeable paving to treat the water with attenuation provided in the subbase of the permeable paving. The foul drainage is proposed to connect into the public sewer via existing connections located on site.

5.88 The Flood Risk Assessment has confirmed that, subject to the findings in the report being employed, then the proposal for the site is deemed acceptable in the terms as set out in NPPF. This to be secured by way of a suitably worded condition.

5.89 In accordance with Policy DMEI 10, a condition would secure details of sustainable drainage measures.

5.90 According, there would be no conflict with Policy SI 12 (Flood Risk Management) of the London Plan (2021) and policies DMEI 9 (Management of Flood Risk) and DMEI 10 (Water Management, Efficiency and Quality) of the Hillingdon Local Plan Part 2 (2020) as they relate to flooding and drainage.

#### *Biodiversity*

5.91 The application is accompanied by a Biodiversity Net Gain (BNG) Assessment and calculations which demonstrates that the scheme will result in a BNG of 28.65% habitat units.



Proposed Front Elevation



Proposed Rear Elevation

## 6.0 CONCLUSIONS

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of applications under the Planning Acts should be in accordance with the development plan unless material considerations indicate otherwise.

6.2 In this case, the relevant documents that currently have **development plan** status include The London Plan (March 2021), Hillingdon Local Plan Part 1 (Strategic Policies) (November 2012), Hillingdon Local Plan Part 2 (Development Management Policies) (January 2020) and Hillingdon Local Plan Part 2 (Site Allocations and Designations) (January 2020). A key **material policy consideration** is the National Planning Policy Framework (NPPF, December 2023).

6.3 For the purposes of the development plan, the Application Site lies within the broader built confines of Ickenham and within Green Belt. The site is located in the Colne Valley Regional Park, the Hillingdon Air Quality Management Area, the A40 - Swakeleys Road Air Quality Focus Area, Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) of 1b. The existing dwelling is of limited architectural and of no heritage value. The site is not within a conservation area and there are no nearby listed buildings.

6.4 Planning permission is sought for the erection of new dwelling with associated parking and landscaping + associated development following demolition of the existing dwelling ("the Proposed Development") on site at 212 Swakeleys Road, Ickenham, Hillingdon, UB10 8AY ("the Application Site").

6.5 The application comprises the resubmission of an earlier application for the same character and description of development that was refused on 23<sup>rd</sup> January 2024 under application reference 13583/APP/2023/3183. This application addresses all four reasons for refusal.

6.6 In overall terms, the Proposed Development would not have any greater impact upon the openness of the Green Belt in terms of its height, size and scale over and above the existing dwelling and outbuildings to be demolished.

6.7 Having regard to the considerations set out in Policy DME1 4 (Development in the Green Belt or on Metropolitan Open Land), the proposed dwelling is no higher than the existing dwelling and there would be a -20m<sup>2</sup> reduction in floor area. There would be a reduction in the proportion of the site that is already developed, with a corresponding increase in openness and spaciousness. There would be a -10m<sup>2</sup> reduction in built footprint. The proposal consolidates built form within the site with a reduction in the spread of built development across the site and more greenery. The dwelling is of a different design to the existing dwelling but retains a 1930s style and its replacement is desirable. The relationship of the proposed dwelling to the only near neighbour is retained. The removal of the front boundary wall and replacement with a new native hedgerow, set behind a grass verge, will greatly enhance the character and appearance of the site, particularly when viewed from Swakeleys Road, and in turn enhance the visual amenity of the Green Belt.

6.8 Accordingly, the Proposed Development is not materially larger than that to be replaced and it would have no greater impact on the openness of the Green Belt than the existing development. The proposal therefore accords with the guidance in paragraph 154 of the NPPF which sets out specific exceptions for built development in the Green Belt as being for the replacement of existing buildings or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development. The proposal accords with both exceptions and therefore accords with the advice in the NPPF.

6.9 For these same reasons, the proposal accords with the objectives of Policy G2 (London's Green Belt) of the London Plan (2021) which states that the Green Belt should be protected from inappropriate development, Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of the Hillingdon Local Plan Part 1 (2012) which requires proposals to be assessed against national and London Plan policies, and Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) of the Hillingdon Local Plan Part 2 (2020) which is permissive of the redevelopment of sites in the Green Belt where the proposal would not have a greater impact on the openness of the Green Belt and the purposes of including land within it, than the existing development.

6.10 The Application Site is large containing a large, detached, two-storey dwelling with outbuildings and a swimming pool and as such there is scope for it to accommodate a new development that is more unique, and in my opinion of much higher architectural quality.

6.11 The proposed design embraces a significant amount of articulation so as to avoid a monolithic appearance. Protrusions and extrusions, deep eaves and architectural detailing all contribute to the high quality of design and assist in breaking up the massing of the building. The front elevation has a double gable with prominent chimney stacks and regular pattern of fenestration, having regard to the golden ratio which follows the 'Fibonacci' sequence. Its height and massing, whilst not dissimilar to the existing dwelling, is reduced through the use of cat slide roofs to the flank elevations, carefully punctuated with modern dormers to provide more head height and space for the first floor en-suite bathrooms. The central doorway is oversized with glazing either side to provide daylight and sunlight into the hallway and passive surveillance of the front garden.

6.12 The proposals also represent a clear enhancement to the streetscene and to the character and appearance of the local area, including the amenity value of the Green Belt. It provides a more attractive setting for the house and a more enjoyable outlook from the house. The dwelling as now proposed is a modern interpretation of the traditional 1930s design that is prevalent in the area and reflects and better reveals the existing characteristics of the site. The proposal therefore accords with the design objectives of Policy D3 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan Part 1 (2012), and policies DMEI 6 and DMHB 11 of the Hillingdon Local Plan Part 2 (2020) insofar as the proposed dwelling follows the existing character, appearance and architectural composition of the site and local area, whilst avoiding unnecessary replication which may otherwise stifle creativity and innovation.

6.13 The application is submitted with a full ecological assessment which has fed into the Landscape Masterplan for the site. Through these means, the Applicant has demonstrated that the development would not adversely affect ecology and biodiversity and biodiversity enhancements are proposed. The Proposed Development therefore accords with Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan Part Two (2020) in this respect.

6.14 Finally, the proposal is informed and accompanied by a Flood Risk Assessment & Drainage Strategy which takes full account of the flood risk and drainage needs of the development.

6.15 The proposal would be acceptable in all other respects.

6.16 The proposal, taken as a whole, comprises sustainable development, having regard to the development plan, the National Planning Policy Framework (NPPF 2023), and other material considerations. Having regard to all the above, we respectfully invite the Local Planning Authority to grant full planning permission for the Proposed Development, subject to the imposition of any necessary conditions, in accordance with the provisions in Section 38(6) of the Planning and Compulsory Purchase Act 2004.

**ROBERT J HUGHES, MTCP MRTPI**  
 Director, Hughes Town Planning Consultancy Ltd  
 28<sup>th</sup> August 2024

