

REVISION G 30/8/23

This Design and Access Statement in its original form was submitted to help secure a development scheme at the Six Bells that included 8 Bed and Breakfast units. The subsequent approvals 14387/APP/2020/4126 & 4127 were granted. An identical application was re-submitted on 0/8/23 as a Revision G, purely to secure another three years period in which to instigate development no changes were proposed. The revision G report was/is identical to that submitted for the consented applications 4216 and 4127. The new time extension application was subsequently granted under new Hillingdon Planning references. 14387/APP/2023/2594 14387/APP/2023/2595 see below.

Heritage Impact Assessment

The Six Bells
Duck Hill Road
Ruislip
HA4 7TP

12th February 2025

REVISION H (Section 73 Submission) 12/2/25

This current report (Revision H) is submitted in support of a Section 73 submission to vary "Condition 2" of the most recent permissions for Full Planning Permission 14387/APP/2023/2594) and listed building consent 14387/APP/2023/2595). The permissions were granted following the 30/8/23 resubmission (explained in blue above). This new section 73 Submission now seeks to reduce the extent of the scheme re-approved and extended through 2594 and 2595. It is proposed to remove the first floor and 8 bedrooms from this approved scheme and so reduce overall scale. Apart from these changes, the scheme and this report are identical to the approved 30/8/24 Revision G submission; for clarity any variation to the original Rev G Design and Access report is discussed in green text in this report

VERNONSMITH
& associates

Croot's Barn
103 High Street
Riseley
Bedfordshire
MK44 1DF

Office: 01234 708630
Mobile: 07411 106830

CONTENTS:	Page
Executive Summary	3
1.0 PRECEPT	4
1.1 Background & Chronology	4
1.2 Revisions to the Approved Scheme 2023	5
1.3 Site Location	8
1.5 Methodology	8
1.6 Pre-Application Correspondence & Consultation	9
1.7 Aims & Objectives of the Application & the Report	9
2.0 SITE DESCRIPTION & HISTORIC CONTEXT	10
2.1 Historic Development Site & Buildings	10
2.2 The Site and Setting	11
2.3 Designated Heritage Assets: Inventory	12
2.4 Natural Landscape	13
3.0 PLANNING POLICY CONTEXT	13
3.1 National Planning Policy & Guidance: Analysis and Implications	13
3.2 Local Planning Policy & Guidance: Analysis and Implications	14
4.0 DESIGNATED HERITAGE ASSETS: ASSESSMENT	16
4.1 Overview & Assessment	16
4.2 The Old Workhouse	16
4.3 The Six Bells: Historic Value Assessment	17
4.4 The Six Bells: Statement of Significance	17
5.0 THE SIX BELLS: SETTING	20
5.1 Setting: methodology	20
5.2 Six Bells Setting: Definition	20
5.3 Six Bells: Analysis of Setting	21
6.0 ARCHAEOLOGY	22
6.1 Overview	26
7.0 MITIGATION AND CONCLUSION	22
7.1 Overview	22
7.2 The Proposals Impact and Mitigation	22
7.3 Conclusion	24
APPENDIX One	27

Executive Summary

This Heritage Impact Assessment has been prepared to understand the implications of the proposal to revise the form of the extension (previously approved 14387/APP/2018/1383 & 14387/APP/ 2018/1383) at the Six Bells. To provide for 10 overnight B & B style accommodation bedrooms within the roof space of the previously approved “barn” type structure. **The scheme to be built will now be of a single storey construction and be 500mm lower at the ridge and 835mm lower at the eaves course.**

These proposals have been developed in light of historic environment planning policy, principle and practice; in that a statutory designation does not and is not intended to prevent change or development; but does compel quality and rigour in any new interventions. The appellant considers that this proposal is acceptable in planning terms because:

- i) Fundamentally the current proposals will ensure the continued preservation of a Statutorily Listed Building otherwise derelict that will close if a new business model is not applied **The reduction in accommodation will reduce investment costs and reduce the impact upon the setting of the statutory listed asset and the Green Belt.**
- ii) The principle of this type of development on the Six Bells site, is established by the October 2018 Approval.
- iii) A building of a similar form and scale to the Current proposals was agreed and encouraged by the Council in 2018.
- iv) Following advice the size of the most recent application refused in November 2020 has been reduced to proportions and dimensions suggested by officers of Hillingdon Council Planning department.
- v) The design of the current scheme will at the very least “preserve” the character of the listed building and will not cause “substantial harm” but in practice will enhance the building and the site as found.
- vi) The “Very Special Circumstances” have been established by the 2018 approval and are still extant within this resubmission. **This reduction will reduce impact upon the nature of the MGB**
- vii) Development within the Green Belt is permitted even without “very special circumstances”. It is the volume, scale and use classes that are controlled and whether other volumes existed on the site. The volume and form has been reduced to the scale advised by officers. **This submission represents even further reduction in line with officers recommendations from 2018.**
- viii) There were a number of exiting volumes on the site, now demolished, that were in a less sensitive location to the current proposals.
- ix) In built form terms, the resubmitted proposals call for a relatively small increase in volume over the approved 2018 scheme certainly small enough for “very special circumstances” to still apply.
- ~~x) Development in green belt is considered to increase intensity and activity. The resubmitted scheme has been reduced by 20% to 8 rooms.~~ **The overnight accommodation element of the original submission has now been completely removed**
- xi) The “openness” of the green belt is moot; the site is enclosed in a wood within a larger suburban recreational wood.

xii) The current development would result in significant public benefits including the preservation of community assets and increased ongoing secure employment for locals. **The removal of the overnight accommodation will now reduce the employment potential of the site but will reduce impact upon the green belt and the historic environment.**

1.0 PRECEPT

1.1 Background and chronology

1.1.1 This report is submitted in support of a resubmitted proposal to increase the size of a previously permitted “Barn” type extension to enable the provision of 8 Bed and Breakfast type bedrooms for overnight accommodation. The Grade II listed Six Bells has had a very difficult recent history and the planning process has become very complex and somewhat dislocated. It is very important that the chronology and rationale for the development of the proposal for the site are understood. The proposals have been reviewed in light of advice from planning officers; ridge height has been lowered to 7.75m two rooms removed from the floor plate and the “Barn” is no 3.0m shorter. The scheme is developed from the same drivers and financial pressures that initiated the original approved and subsequent schemes. The following paragraphs explain the changes brought about from pre-application advice received after a reused application in November 2020: 14387/APP/2020/2775 & 14387/APP/2020/2776 **The attached new drawing illustrates that the “barn” retains its overall plan form dimensions but will reduce in height through the loss of the first floor.**

As Found Condition January 2018

1.1.1.1 Before the approved application was submitted and the present applicants took possession of the Six Bells, the building was derelict, flooded, vandalised and surrounded by unauthorised structures and landscape features. It was by Historic England (English Heritage) definition, if not by registration, a “*Listed Building at Risk*”. It was in “*very Bad*” condition it was “*vacant*” with some signs of previous squatting and drug use. Parts of the building were “*vulnerable*” in particular, the floor over the cellar were in immediate risk of collapse. Overall, the building was a “*Priority A*” in “*Immediate risk of further rapid deterioration or loss of fabric with no solution agreed*”. The Local Authority has not issued any enforcement notices.

Ownership.

1.1.1.2 The present owners (applicant) took possession of the Six Bells in June 2018, after many years of the building being vacant and have been striving to preserve the building and make the Six Bells a successful self-sustaining business ever since.

Consultation with the Local Authority

1.1.1.3 Prior to taking possession of the building in June 2018 the applicant appointed a consultant to help with consultation and liaison with the Local Authority Hillingdon Council. Vernon Smith and Associates then produced a concept scheme for discussion with Hillingdon Council’s Conservation Officer Charmian Baker (a very experienced Local Authority historic buildings officer about to retire at the time of our meeting). The applicant, consultant and Conservation Officer met at the Council’s offices for a very helpful and productive meeting after which the applicant received the following email:

During the discussion the applicant a very experienced local restaurateur with many years in the hospitality industry, explained that the scale of the building proposed was necessary to deliver the necessary number of covers. This would enable the public house to be sustainable business particularly in light of the significant initial extra expense incurred through the restoration of the listed elements of the house. The budget increased by 20%. Ms Baker understood the problem and in helping to get the Six Bells restored and self sustaining sent the following response on the 29th March 2018 to the applicant's consultant. (The original email can be provided upon request)

Dear Mark,

Firstly, thank you for the drawings. As promised I have been on site to assess the likely impact of the proposed new restaurant barn on the listed building.

As mentioned in my previous e-mail, I am satisfied that the proposed barn is of a design and a roof pitch which would appear traditional and in keeping with this complex of buildings. The eaves would be of comparable height, the external finish would harmonise very satisfactorily, and the bulk of the building would only really be apparent in views of the building from Ducks Hill Road when approaching from the north. In my view, this would be acceptable. I am also of the view that a restaurant use would be very suitable for this listed building, would enable the retention of its existing outbuildings, would lead to a great enhancement of this site and, very importantly, one which should have a sustainable future.

Secondly, thank you for your letter. There are no issues at all with working on the toilet and kitchen areas, as these parts of the complex are modern and of no internal interest. For the works to the bar, in the 18th century part of the listed building, I would usually ask for a plan of the proposed works and a site visit to determine to what extent the original fabric would be affected. However, this being my last day in this job, I cannot do this myself. Could I ask you to submit a plan of this area and leave this work until my successor is in post from 9th April?

Meanwhile, you could submit the listed building consent and planning permission for the site, with Heritage Statement.

With kind regards, Charmian

The principle of development on the site has, since the letter above, been established through a number of various permissions (cited above). This current variation submitted as a Section 73 Application has come about because of the disproportionate increases in building materials costs since the grant of the 4126 and 4127 permissions. These increases have required the applicant to reduce the scale of the scheme. In practice this takes the scheme back closer to the original preferences of the Council's officers.

1.2 Revisions to the Approved scheme 2023

1.2.1

The pressure on public houses prior to the pandemic was recognised almost daily in the national press and through and following the pandemic, the situation has not improved. The increase of development costs through materials and shortage skills means that investing in the future of hospitality business is at best a high risk endeavour. Since the renewal of the existing permission, which included the 8 overnight accommodation units the applicant has become aware that the proposal is not commercially viable, particularly in the restricted envelop prescribed by the Council through the grant of permission in 2018.

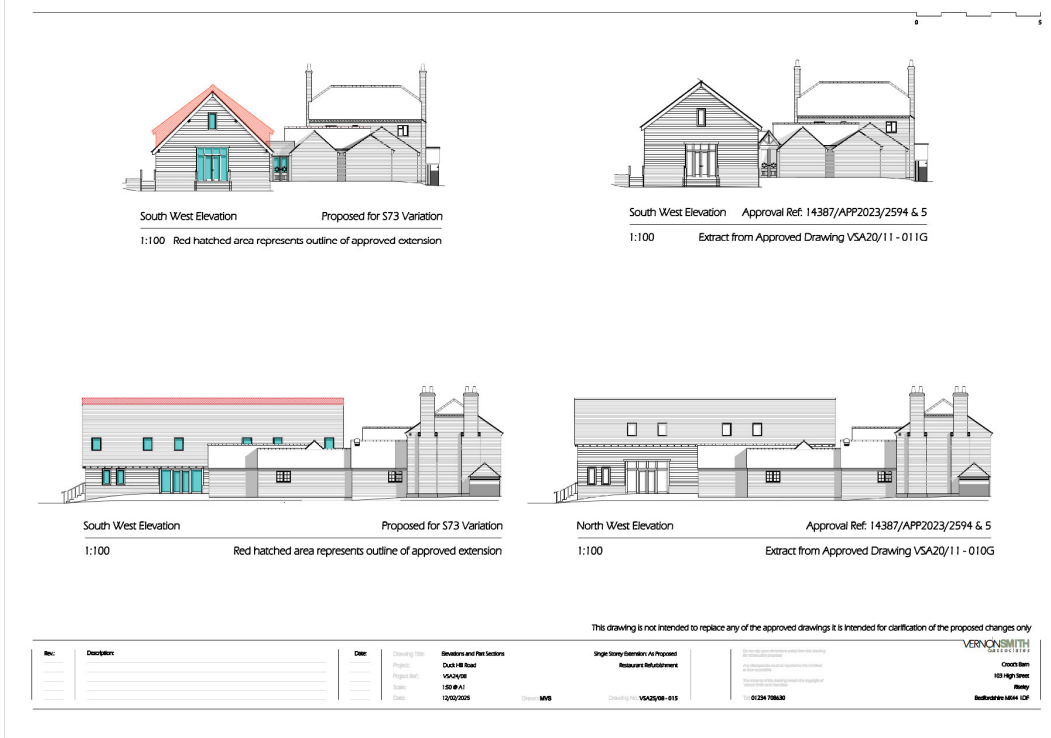
However, in an effort to develop the future potential and therefore the long term preservation of the Six Bells Public House a reduced more affordable scheme has been proposed to enable the project to go ahead. The changes are clearly illustrated on the proposal drawings submitted with this application. The fundamental changes required are described as follows:

- 1.2.2 For clarity the proposed replacement drawings have been given new overall 2025 references but have the same number as the existing “approved drawings” from: Full planning permission 14387/APP/2023/2594 and Listed Building Consent 14387/APP/2023/2595, as follows:

2023 Approved Drawing	Proposed S73 Replacement
VSA20/03 – 006G Site Plan	VSA25/08 – 006 Site Plan shows reduced number of rooflights
VSA20/11 – 007G Ground Floor Plan	VSA25/08 – 007 Ground Floor Plan Stairs and Lift are removed from the plan
VSA20/11 – 008G First Floor Plan	The first floor is removed from the scheme No replacement drawing required
VSA20/11 – 009G Elevations: Barn	VSA25/08 – 009 Elevations: Barn showing reduction in ridge and eaves Levels
VSA20/11 – 010G Elevations: Six Bells	VSA25/08 – 010 Elevations: Barn showing reduction in ridge and eaves Levels in context
VSA20/11 – 011G Elevations: Six Bells	VSA25/08 – 011 Elevations: Barn showing reduction in ridge and eaves Levels in context

As the changes are only evident in the elevations the following drawings are submitted for clarification purposed only; they are not proposed as approved drawings unless Hillingdon Council deem it necessary to include:

VSA25/08 – 015 Comparative Elevations
VSA25/08 – 016 Comparative Elevations



- 1.2.3 Removal of the first floor accommodation from the “Barn”
- A significant reduction in costs has been achieved through the removal of the whole of the first floor. This means that the 8 accommodations units are removed and the stairs and lift to the first floor are no longer necessary see changes to ground floor plan VSA25/08 – 007 and VSA20/11 - 008G First Floor Plan is no longer required and a new replacement is not needed.

- 1.2.4 Reduction in Elevation Heights
- The removal of the first floor structure enables the ridge and eaves to be lowered by 500mm 835mm respectively These changes are shown on VSA25/08 – 009, VSA25/08 – 010, VSA25/08 – 011 which are proposed as the S73 replacement drawings for “Condition 2”. Further graphic explanation is shown on VSA25/08 – 015 and VSA25/08 – 016

1.3 Site Location

- 1.3.1 The Six Bells is located on Duck Hill Road on the northern outskirts of Ruislip. It sits in a very generous plot with vehicular and pedestrian access off Duck Hill Road. The public house is in very close proximity to Ruislip Lido and will contribute to an area that is well provided for in terms of public facilities.



1.5 Methodology

- 1.5.1 The document has been structured and framed to adhere to the aims of guidance from Historic England (English Heritage), in particular *“Conservation Principles; Policies and Guidance”* 2008 and *“The Setting of Heritage Assets”* 2015. Both documents will assist in the production of coherent and practical historic assessment. They will not only aid identification, significance and value, but help in applying the findings to the development of a sensitive but practical scheme of preservation and alteration. For the purposes of this study the proposed development site lined in red on the image above will be referred to as the **“Six Bells”** and will include the broader curtilage outlined in red.
- 1.5.2 The report will deal solely with the assessment of the impact of the proposals on “registered heritage assets” within the site and others that because of their proximity imply that their setting may be impacted upon by the proposed development. Any resultant design mitigations that may be required will be expanded upon within this report and in the Design and Access Statement also submitted with this application. The Design and Access Statement will also deal with other issues of development management and control.

- 1.5.3 This paper will endeavour to establish the “value” and “significance” of the historic environment of this part of Duck Hill Lane and then develop this understanding into an assessment of the impact of the proposed scheme on that environment. In understanding the value of the grade II listed Six Bells and its broader historic setting, this report will rely upon the guidance in *“Understanding Place: Conservation Area Designation Appraisal and Management”* Historic England, (English Heritage) 2011. From these analytical processes, the report will also explain what measures have been taken to mitigate any “harm” that may be identified and analyse the potential compromise that may be necessary between the need to deliver a viable, sustainable and prosperous business essential for the preservation of the building and its historic character. However, as “The National Planning Policy Framework” (NPPF) suggests, this report will make a proportioned, practical review of impact, it will not provide an in depth treatise on the historic and social provenance of the historic assets in question.

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

(NPPF) 2019 Para 189, P.55,

1.6 Pre-application Correspondence & Consultation

- 1.6.1 A pre-application consultation was submitted on October 2024 to test the planning principle of removing the first floor and reducing the overall height and massing of the barn. Hillingdon Council planning service assessed the drawings submitted and provide a feed back letter which supported the proposals but required a reduction in the number of the roof lights. The new drawings submitted for the variation in “Condition 2” of the planning and listed building consents illustrated that the rooflights have been reduced to three per pitch. Three cast iron Conservation roof lights are proposed to help with natural ventilation and task light which should help reduce overall mechanical ventilation energy and electricity consumption. The full response letter from the Planning Service is cited in Appendix One

1.7 Aims & Objectives of the Application & the Report

- 1.7.1 It is understood that this application calls for development on a sensitive site, in terms of both the historic and to some extent the natural “Green Belt” environment. However, it is considered that with a careful approach and sensitive design the site can continue to deliver the much needed rehabilitation of a Listed Building at Risk and ensure that the Six Bells can play its part in the local community. Therefore, it is the aim of this application to help develop the grade II listed building into a viable thriving business; taking advantage of the undoubted qualities of the C18th century building and removing the later C20th hindrances to efficient operation of a restaurant. The rehabilitated Six Bells will be self preserving by providing character full but practical accommodation for the hospitality offer in North Ruislip.

- 1.7.2 It is the aim of this report to establish the value of the Six Bells and its setting, by establishing its significance both locally and nationally. The report will go on to understand the impact of the proposals on the registered historic environment of the Six Bells and any other assets within close proximity. From this assessment, the report will indicate how the analysis of “significance” and “value” have steered the design process in terms of layout, relative proximities and design style. **For this Section 73 submission the proposed amendments will be tested for any potential impact upon the significance and character of the listed building. However, the applicant considers that as the proposals call for reduction in massing, scale and accommodation; the impact will be reduced from that originally assessed as representing less than, less than substantial harm**

2.0 SITE DESCRIPTION & HISTORIC CONTEXT

2.1 Historic Development: Site & Buildings

- 2.1.1 As the listing description states the Six Bells public house has sat on Duck Hill Road since the very late C18th/early C19th, the 1865 – 1892 Ordnance Survey map shows at this time the public house with a very small projection to the north side of the rear elevation; it is assumed that this was part of the original build or added relatively soon after as the “brew house”? The London Directory shows the Six Bells as having a Mark Clayton as publican in 1826 and this date supports the probable very late 1700’s early 1800’s construction date. The dentiled eaves in particular being a vernacular design mechanism from this period. The as found 2018 building complex configuration has developed since C1980, the lean to extension mentioned in the listing description is now obscured by later development. The listing description states:

THE SIX BELLS PUBLIC HOUSE

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

1. 5018 DUCKS HILL ROAD (West Side) RUISLIP COMMON The Six Bells Public House TQ 08 NE 41/101 10.4.72. II 2. C18 with alterations. 2 storeys, 2 windows. Painted brick with brick dentil cornice. High pitched tiled roof, half hipped at right. Replaced recessed sash windows with glazing bars, those on ground floor with external louvred shutters. Half glazed central door under gabled hood on curved brackets. Long weatherboarded lean-to right extension.

Listing NGR: TQ0837289046

Selected Sources

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: TQ 08372 89046

©Historic England

2.2 The Site & Setting

2.2.1

The Six Bells sits in a very generous plot that has developed over many years with a number of small outbuildings and other enclosures. These are shown variously on later editions of the Ordnance Survey maps. The present situation as illustrated on **VSA20 03 – 001** site plan, shows the Six Bells sitting in a building complex that includes the recognisable outline, albeit somewhat obscured, of the early rear lean to extension. There were also a series of further extensions from the early and late C20th now removed. The site was also blighted by a range of rather strangely designed “concession” style lightweight buildings and structures. It is assumed that these buildings developed in the late 1990’s, they were seriously dilapidated and compromised the setting of the Six Bells. The broader site is now cleared but views from Bing Maps “Birds Eye” thought to be no more than 5 - 8 years old indicates that the car park has a capacity of 30 cars. The car parking is completely surrounded by a very large of scrub and a grassed area with a substantial cover of mature and semi mature trees.



2.3.1 The criteria for the selection of which heritage assets require full detailed assessment are described in Section 4.1. However, this section identifies designated assets within 150m of the centre of the site (See map in Section 4.1). The Six Bells is not within a designated Conservation Area nor is it within or near to the setting of a Scheduled Ancient Monument. The Six Bells is on the extreme North West edge of the Ruislip Motte and Bailey Archaeological Priority Area. The remains of the Motte are 1.35 Km to the south and are not visible from the Six Bells and the Six Bells is not visible from the Motte. Therefore, the revised current proposals will not have any potential for further impact upon its setting.

The Six Bells: Grade II Statutorily Listed Building

2.2.1.1 The Six Bells public house will by definition be impacted upon by the proposed works and the new extension. So, this report will carry out a detailed and comprehensive assessment of that impact both in terms of the character of the historic building and the potential for impact on overall historic setting.

The Old Workhouse: Grade II Statutorily Listed Building

2.2.1.2 Although the listing description for this building suggests that it is C18th, the architecture, scale and massing of the as found building suggest a later date. The building is 105m north the development site. The relatively close proximity to the proposed works may potentially result in an impact upon its "setting" but the heavy and well established tree cover on and between both sites prevent a direct visual impact. Any obscure views between the two buildings will be fleeting and will not comprise the Old Workhouse's setting. Therefore, it is proposed not to carry out further analysis as the current proposal and reduced proposal represents less harm than the refused November 2020 application. The character and or setting and will have significantly less impact than the nursery buildings that are 50m closer.



Burnham Off Station and Bill's Cottage: Grade II Statutorily Listed Buildings

2.2.1.3 The garage and Cottage form a small group some 288m to the South of the site off Brakespear Road. They are not visible from the Six Bells and the Six Bells is not visible from the group. Therefore, further analysis is not required

Archaeological Priority Area

2.2.1.4 It is likely that development at the Six Bells will have the potential for archaeological evidence as the proposed site of the Barn footprint is previously built upon land. The potential impact and mitigation is deliberated in Section 4.0 of this report. (please also see 2.1.2 above)

2.4 Natural Landscape

- 2.4.1 The site borders an area of scientific importance but is not a part of it. The curtilage land was neglected for a number of years but is now cleared and somewhat improved. The site has large areas of scrub grass and tree cover that provides the potential for a reasonable profile of biodiversity. The current proposals do not require the expansion of hard standing and any removal of trees is of category "C" or "U" specimens.

3.0 PLANNING POLICY CONTEXT

3.1 National Planning Policy & Guidance: Analysis and Implications

- 3.1.1 National planning policy with regard to the historic environment derives from the National Planning Policy Framework 2019 (NPPF) Section 16, Page 54. **The NPPF has since been revised in 2024 but Section 16, page 59 remains true to the original principles and philosophy of conservation through regulatory planning.** This section of the report will analyse the policies that are relevant to and will impact upon these new proposals for the Six Bells from "Conserving and Enhancing the Historic Environment". The broader development management planning issues relevant to the proposals will be dealt with in the Design and Access statement accompanying this application.

Paragraph 189

- 3.1.2 Overall, the proposals for the site can be considered sustainable in historic environment terms; in that they are a continuation, albeit revised, of works approved in 2018 which will lead to the delivery of a self preserving historic asset. The character of the listed building has been preserved and will continue to be preserved as the new proposals will provide a viable future for the Six Bells. Subsequently, a revitalised Six Bells will significantly improve its offer as a local community asset and bring wider social and economic benefits. It is hoped that the alterations and extension will also contribute to the re-definition of the character of the immediate historic environment and allow the site to make a more coherent contribution than the as found condition.

Paragraph 190

- 3.1.3 It is considered that a sensitively extended and revitalised Six Bells public house will not just preserve the character of the area; it will enhance the immediate locality and setting of this part of Ruislip over the 2018 as found situation. The proposals will lead to increased levels of local employment and increase in custom to shops and other community facilities. Most

importantly, the Six Bells will contribute to local social cohesion and interaction providing an improved place to meet, socialise and work.

Paragraph 191

- 3.1.4 The Six Bells was in a serious state of dilapidation when the current owners took possession of the public house in 2018. The building had fallen into a parlous state in just a couple of years or so. The condition of the building was the neglect of previous owners and is now in the process of slowly being reversed. The work and expenditure to date of the present owners has reversed the decline but if the building is going to remain in its restored condition it will need to generate quite a substantial income stream to alleviate the financial pressure of the restoration process and the decline in the hospitality industry.

Paragraph 193/194

- 3.1.5 Overall, it is considered that the proposals will not pose “significant” “harm” to the character and setting of the Six Bells or the setting of the other assets listed in Section 2.2 above. However, even if there is a low level of harm to the setting of the Six Bells it is more than offset by the improvements to the operational efficiency of the building and therefore ongoing preservation.

Paragraph 196

- 3.1.6 The “very special circumstances” that underpin the ongoing rescue process for the Six Bells, were its poor condition and the need to preserve the fabric of the listed building before total collapse. The historic core of the Six Bells is now repaired but at great cost to the applicants hence the need for this application for a revised scheme. The Barn is a large volume to attach to the Six Bells but has been designed to have an appropriate composition that reflects the sort of larger volumes found in the rural environment of Hillingdon. This then suggests that the proposals fall in line with the spirit and intention of paragraph 196, in that any perceived harm is not only mitigated by design and materiality but also the substantial public benefits of a preserved listed building that is also a valuable community asset.

3.2 Local Planning Policy & Guidance: Analysis and Implications

Local Plan Part 2 (January 2020)

Development Management Policies: 5.0 Historic and the Built Environment

- 3.2.1 A review of the requirements and spirit of the policies contained in the local Plan Part 2 is as follows:

Para 5.6

3.2.1.1 It is considered that the new proposals (Dec 2020) for the Six Bells will help rehabilitate a “Listed Building at Risk” and secure its preservation for many years to come. This will allow the Six Bells to contribute fully to the cultural and community well being of Ruislip and wider Hillingdon Borough.

Para 5.7

3.2.1.2 This heritage impact statement is accompanied by a set of highly detailed drawings and reports in application for planning and listed building consent; it is asserted that they more than comply with the requirements of this policy.

Para 5.8

3.2.1.3 An assessment of the relevant parts of the NPPF is provided in Section 3.1 above and the basic tests of layout, scale, form massing and character of the proposals is provided in the following Section 4.0 of this report.

Para 5.9

3.2.1.4 This current application will deliver the complete rehabilitation of a once Listed Building at Risk. The additional use class to now deliver 8 bedrooms is necessary to enable the Six Bells to generate a predictable income in a less than the unpredictable financial environment of hospitality.

Policy DMHB 1 A: Historic Assets

3.2.1.5 The applicant considers that this new scheme for the restoration of the Six Bells, complies with the intention and spirit of policy DMHB 1 for the following reasons"

- i) The proposed use (A4) will not change and a complimentary (C1) Bed and Breakfast use is proposed to enhance the Six Bells hospitality offer, at the same time preserve the historic asset.
- ii) The current proposals will reverse the loss of "value" and "significance" and reverse the "harm" that the years up to April 2018 have caused. The extra restaurant space and the new bed and breakfast rooms that the extension will provide, will help the building preserve itself and is designed to complement the character of the Six Bells.
- iii) The building made a positive if somewhat tarnished contribution to the locality; the proposed scheme will restore the local significance of the Six Bells and what it can offer to the community that values it and can find employment there.
- iv) The extension is designed to provide the accommodation to enable long term viability for any business run within it and at the same time be sympathetic to the character of the listed building.
- v) The proposed extension is designed in form and materiality to complement the existing building.
- vi) The completed scheme will result in a much improved quality of setting for the Six Bells than the as found condition.

Policy DMHB 1 B: Historic Assets

3.2.1.6 Any new development at the Six Bells will have to comply with the latest version of the building regulations which will lead to a significantly more energy efficient building and business that was run on the site in the past.

Policy DMHB 1 C: Historic Assets

3.2.1.7 The Proposals will deliver the completion of much needed restoration of the building (previously at risk) and provide a new future for this nationally and a locally significant listed Building.

Policy DMHB 2: A: Listed Buildings

3.2.1.8 The re-submitted scheme is the result of a very careful development of the principles of good practice and design within the historic environment and has been developed in liaison with the officers of the Council's planning and Conservation Department.

Policy DMHB 2: B: Listed Buildings

3.2.1.9 This Heritage Impact Assessment (HIA) provides for the requirements of this policy.

Policy DMHB 2: C: Listed Buildings

3.2.1.10 This new application does not call for the loss of any historic fabric and it is intended that the works will help reveal and restore some of the character lost through previous insensitive interventions

Policy DMHB 2: D: Listed Buildings

3.2.1.11 At the point at which the applicant took possession of the building, the setting was seriously compromised; the proposal will allow for the restoration of the historic context of the Six Bells.

Policy DMHB 2: D: Archaeological Priority

3.2.1.11 The site at the Six Bells has been disturbed by many built and landscape interventions over a long period of time.

However, the nature of the new proposals could mean that foundations and over site could be deeper than previous proposals. It is therefore proposed to invite the Council and or its representatives to provide for a watching brief during excavations for and construction works.

4.0 DESIGNATED HERITAGE ASSETS: ASSESSMENT

4.1 Overview & Assessment

- 4.1.1 The nature of the relative exposed site at the Six Bells means it makes a valuable contribution to the character of the locality. However, the local historic environment is not designated as a Conservation Area or a locally listed historic area, so in term of environmental impact, this study will concentrate on the setting of the Six Bells and the workhouse to the North. Further, the study will assess the impact upon the special historic character of the Six Bells and the physical impact of the "alterations" and "extensions" on its historic fabric. The Six Bells sits on an historic site that recent map evidence shows has seen many changes in layout and development intensity. The potential for Archaeological remains is limited because of the high level of activity on the site during the C20th in the area that it is intended to locate the extension.

4.2 The Old Workhouse: Grade II Listed

- 4.2.1 The "Old Workhouse" was listed two years after the Six Bells and as the descriptions asserts, its provenance is somewhat confused. However, the building enjoys a statutorily listed status and as such requires assessment. It is considered that this new revised scheme for the restoration of the Six Bells will not impact negatively upon the Old Workhouse in terms of physical intervention or impact upon its special character. Therefore any harm to the workhouse can only be to its setting. The applicant considers that the proposed work at the Six Bells

will not cause any “harm” to the “value” and “significance” to the setting of Old Workhouse because:

4.2.1.1 The Old Workhouse is sufficiently remote from the Six Bells for the new extension not to impact upon setting. It is over **100m** from the site of the new development with Duck Hill Road between them.

4.2.1.2 There is a significant well established tree cover around and between both sites; that is comprised of large deciduous specimens. The tree cover is off sufficient number for some die back of trees not to change the nature of that setting and result in an increase in potential impact upon the setting.

4.2.1.2 Until recently, (2018) the Six Bells was in a poor state of repair and with what appeared to be some unauthorised structures and lightweight buildings. The C20th timber framed buildings were in themselves inappropriate in an historic environment, in terms of their design and materials. The buildings were set in the middle of the site closer to the Workhouse having more impact on its setting than the current proposals (see image in 2.1.1) The new extension will be larger than the now demolished buildings but will be set much farther back into the site reducing impact upon setting.

4.3 The Six Bells Public House: Grade II Listed



The Six Bells prior to Restoration

Historic Value Assessment

4.3.1 The new reduced proposed alterations and extension to the Six Bells will enable the once unoccupied and somewhat derelict public house to once again contribute to its own self preservation, ongoing viability and the community in which it sits. The following section identifies the value of the Six Bells as a Registered Historic Asset. Historic England (English Heritage), in its publication *“Conservation Principles: Policy and Guidance”* April 2008, (p.28 – p32.), sets out four fundamental criterion by which an historic asset can be assessed to determine its value and so its significance.

- i) Evidential Value
- ii) Historical value
- iii) Aesthetic Value
- iv) Communal Value

Assessment: Evidential Value

4.3.1.1 The Six Bells was built sometime between the very late 1700's and the first decades of the 1800's. Although the London Directory states that the building was operating as a public house in 1826, it is not known whether the Six Bells was purpose built as a public house. The size of the site suggests that either way, the building was associated with a small holding or at least some food growth and animal husbandry. If, as the London Directories suggest, Mark Clayton was the first Landlord, the Six Bells has provided hospitality to Ruislip residents and visitors for nearly 200 years. This highlights evidential "value" and justifies the statutorily listed status. The pre 1840 date ensured this inclusion on the list which also underpins the buildings value.

Assessment: Historical Value

4.3.1.2 Arguably, the two most important buildings in the historic development of a village or town are the local Church and the Public House. The Six Bells marks the most northerly limit of Ruislip and because of the early listing date and lack of large scale development around it; represents a section of Ruislip that has not significantly changed for many years. The Six Bells early date indicates its importance and value in the historic development of this part of Ruislip and indeed London.

Assessment: Aesthetic Value

4.3.1.3 As a piece of architecture the Six Bells stands apart from its neighbours and other vernacular buildings of the same period. It is a well proportioned and an elegant example of a late C18th vernacular building with some quite sophisticated detailing for the period and its vernacular roots. Most historic public houses have design detail concentrated on the front elevation; however with the Six Bells the dentiled eaves course is run around the side of the building to terminate the half hips on the north and south elevations. The three bay configurations, defined by some unusually large and typically squat frontages, Georgian 10 over 10 sashes, which set it apart from many other historic buildings locally and to some extent regionally. There is no doubt that the Six Bells is aesthetically valuable not only as an historic building but also as a piece of good historic architecture that contributes to the character of this part of Ruislip.

Assessment: Communal Value

4.3.3.4 The Six Bells has served the Community of Ruislip for at least 192 years. The building sits on the northern boundary of Ruislip marking the transition from suburban London into a pocket of farmland. This ensures that the public house remains as a "destination" for local residents and visitors as it has done for many years, particularly with the proximity of the Ruislip reservoir. The new proposals have generated a lot of interest from local residents who are keen for the Six Bells to remain open. The Six Bells is perhaps the most valuable contributor to local character.

Statement of Significance

4.4.1 The value of the Six Bells is established above in Section 4.3.1 and underpins this section of the report in deriving the "significance" of the

designated asset. As before the methodology and criteria employed is described in section 4.2.5 above.

Significance: Fabric & Evolution

4.4.1.1 The statutory listed status of the Six Bells is an immediate and understandable determinant of significance and establishes the buildings contribution to culture and community, nationally as well as locally. This application does not propose any alteration to the C18th historic fabric of the building, so at this stage a full archaeological assessment and phasing of the surviving fabric is not necessary or economically viable for the applicant and owner. However a preliminary phasing assessment can be found in colours on the ground and first floor as existing plans VSA20 11 - 002 and VSA20 11 - 003.

The Six Bells has suffered from some ill advised interior decoration in the mid to late C20th but the fundamental fabric survives in largely its original configuration. It is suspected that sometime in the mid C20th a partition in the ground floor bar area has been removed but its provenance is unknown. Overall, the building is significant because of the level of survival of historic fabric in its original state. The floor plan, roof structure and fenestration are from the early phases of construction work.

Significance: Human Value

4.4.1.2 Assessment of the broader communal value has established that the Six Bells is more than valuable to local residents and their representatives. Research continues into the history of public houses and communities continue to fight their closure and conversion to residences. Consultation with Local Councillors has established that the residents of this part of Ruislip are very pleased that the Six Bells has reopened albeit incomplete. The building will be an attractive destination for people wishing to dine because of its semi rural location and most importantly the historic character that sets it apart.

Significance: Heritage: Fabric & Phasing

4.4.1.3 The C18th fabric is a significant as a relatively rare, relatively intact, survival of construction methods and materials for this early part of the C18th. The fenestration especially to the front elevation, is very early and probably original, displaying all the squatter proportions of a Georgian rather than later Victorian sash window. The Original plan form shown on the application drawings **VSA20 11 - 003** and **004** shows that most of this early fabric survives. The later extension phases appear to be one of some limited Victorian extension which is now blurred into the later C20th kitchen and toilet extensions. These extensions are not significant as pieces of architecture but do help chronicle the history of the Six Bells.

Significance: Heritage Value & Compromise

4.4.1.4 In comparison with other buildings of this period throughout North West London, the Six Bells holds its own in relative significance terms. However, nationally it is not exceptional when compared to some of its contemporaries of this type of building; it does not demonstrate innovation (for the time) in architecture or construction techniques

Significance: Association

4.4.1.5 Apart from the historic role of Public Houses within historic settlements that have served the community for many years, the Six Bells does not gain any extra significance through association with important famous people, artefacts collections and or cultural associations.

Significance: Setting & Context

4.4.1.6 Setting and context are perhaps the most important consideration in terms of this application and a definitive understanding of the setting of the building is essential in the development of a sensitive rigorous scheme for any changes within that setting.

The Six Bells has a long established large curtilage that tends to suggest some form of smallholding use. The surviving heavily treed green area that surrounds the parking area shows no sign of agricultural cultivation or husbandry but it is an integral part of the “setting” of the building and a contributor to its significance.

Significance: Comparative Value and Significance

4.4.1.7 Comparatively, the Six Bells is a “significant” building within Ruislip and arguably it is also significant in terms of other public houses within other settlements in Middlesex. The building has less comparative significance nationally but is the equal to most buildings of its type. Overall, the Six Bells is significant because of its listing and its relatively early date for suburban London. Irrespective of this, it is an important and valuable place to its local community and as such deserves respect and sensitivity in any proposals for its development.

5.0 THE SIX BELLS: SETTING

5.1 Setting: Methodology

- 5.1.1 Historic England has revised and upgraded its guidance on the analysis of “setting” and published *“The Setting of Heritage Assets”* in March 2015. The “steps” that it recommends for the rigorous assessment within the setting of an historic asset will be followed in this section of the report.

5.2 Six Bells Setting: Definition

- 5.2.1 The Six Bells sits in a very green setting in an open area of cut back scrub land bounded by and mostly covered by trees hedges and other planting. From the Six Bells and the site in general there are mostly glimpses/views of C.20th buildings through the trees. Duck Hill Road and the side access road bound the asset on the east and south sides. The immediate setting of the Six Bells remains in its original historic curtilage shown on the 1865 Ordnance survey map. To the West and the North there are further open rural landscapes, designated as Nature Conservation Sites of Borough Wide Importance. To the South, the access road is flanked by a street of C20th speculative housing. It is asserted that the setting of a heritage asset is not a fixed concept; it is not an exclusion zone that is intended to prevent any change within that radius. For the sake of this assessment the extent of the historic setting has been set at a

nominal 150m, but as there is such a dense boundary at present the building can only really be fully experienced within that boundary

“The setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.”

5.3 Six Bells: Analysis of Setting

Step One: Identify Affected Assets

5.3.1.1 For the purposes of this study the analysis will concentrate upon the red line area of the buildings curtilage as the environment to the east comprises a large portal framed nursery which categorically does not preserve setting.

Step Two: Setting and Asset Significance

5.3.1.2 The physical surroundings of the Six Bells consist mainly of natural light scrub around the boundaries with some specimen deciduous trees on that boundary. The site is well maintained at the moment but will benefit from some landscape enhancement that this application will deliver. The car park will have to be retained with some limited non blacktop geotextile based extension. The site will still retain its tranquil natural and peaceful character. The assessment of Value and Significance has established that the setting of the Six Bells is an important ingredient of its character

Step Three: Impact of Proposals on Setting

Location & Siting of the Development

5.3.1.3 As previously advised, The new resubmitted “barn” structure will be located to sit back from the front elevation of the historic core of the Six Bells and will not impinge on the established views of the front elevation. The Barn will only connect to the later C20th additions to the Six Bells complex and will replace some very large but poor later C20th buildings and structures.

The Form & Appearance of the Development

The extension is designed to reflect a Middlesex barn range to respond to the scale and form required for the restaurant extension. It is considered that a “Barn” is the most appropriate and sensitive way to introduce a large building into the Six Bells built complex. Although the “Barn” will represent a relatively substantial piece of architecture, the completed rehabilitation programme will result in a significantly improved setting for the historic core of the Six Bells. Especially with the reductions in scale over the previous application.

Step Four: Maximising Enhancement, Minimising Harm

5.3.1.4 As a direct outcome of the proposed development, the landscape interpretation will be improved and the quality and materiality of the existing C20th buildings will also be improved. The barn has been located well back in the site and kept as small as practical for the successful operation of the restaurant and inclusion of the new rooms. The design aesthetic is rural and the barn will be clad in timber on a brick plinth to replicate historic precedents in Middlesex

6.0 ARCHAEOLOGY

5.1 Overview

- 5.1.1 The Archaeological potential at the Six Bells would have been reduced by the C20th activity and construction works in the immediate setting of the historic public house. The erection of the new barn will require excavation for foundations that potentially will be deeper and large than any work that has gone before. This suggests that a watching brief will be required for the excavation works and the applicant has to be willing to accept some delay if significant below ground archaeological remains are discovered. However this is unlikely.

7.0 MITIGATION & CONCLUSION

7.1 Overview

- 7.1.1 The Six Bells Public house enjoys a relatively high level of fundamental preservation but following its closure its condition deteriorated quite quickly to the point at which the applicant took possession. The current re-submitted proposals would enable the Six Bells restoration to be completed and even in the current circumstances become a viable business with its role in the local community restored. The future of public houses and restaurants in the United Kingdom is notoriously parlous and the pressures have increased significantly with the outbreak of the pandemic. For the Six Bells to have a long term future, some changes to the way that the public house operates and circulates are necessary. The listing status of the building indicates that Central Government and Historic England have already recognised the historic “significance” of the public house. Sections 3.0, 4.0, 5.0 and 6.0 have further analysed the “value”, “significance” and “setting” of the Six Bells and has established its place in history and the community.

Following advice from planning officers, the re-designed has changed the approach to massing, scale, and form to reduce the scale of the building relative to the public house. This will enable new design to ingratiate itself into the existing situation with minimal harm to character and setting. There will have to be some inevitable compromise in terms of roof historic forms and indeed, the applicant would prefer not to have to build large extension but introducing over night accommodation facilities is the only business plan that has a chance of success as residential development is not possible

7.2 The Proposals Impact & Mitigation

- 7.2.1 Following on from the pre-application process the approach to the alteration and design have employed a series of extra mitigating measures (listed in 1.6.1 above) to enable the relatively large but necessary extension to be of a similar height to the existing building. The new Council recommended design approach required that the barn be no higher than the public house to avoid any potential harm.

7.2.2 The further reduction in scale and massing, over and above the approved schemes 4126, 4127 and in 2023, 2594 and 2595 represents even less potential for “harm” to the setting, character and significance of the registered asset. This leads to the conclusion that if on balance the previously approved scheme had an acceptable impact upon the listed building a reduced scheme such as that illustrated on the attached drawings should also be acceptable.

The semi rural location and the requirement for a large space, led to the adoption of a “barn” form to provide the space required and introduce a form scale and massing that would not be alien in this location or contradictory to the architecture and provenance of the Six Bells.

7.3.2 The design mitigation measures designed to minimise “harm” to the designated historic asset in terms of built character and setting are summarised as follows:

- (i) Apart from a rather crude C20th bar, the ground and first floors of the original historic core of the Six Bells have remained unaltered. Please see **VSA20 11 - 001 to 011**
- (ii) The proposed introduction of a new large floor plate to provide the number of covers required for viability, has been concentrated into one large footprint within a rural “barn” form that reflect regional precedents.
- (iii) The new use proposed will be accommodated within the already approved (2-018) single volume, albeit enlarged.
- (iv) The extension has been designed to appear as an independent building although it will be connected to the existing structures with a timber frame and glazed structure
- (v) The Extension will read architecturally as an agricultural building; it will have a single storey form originally with 50° roof pitch to the refused application that has been reduced to 36° to reduce overall building height.
- (vi) The building will be fenestrated using a large glazed cart type opening with some smaller single light openings. The frames will be timber.
- (vii) The new barn will be timber clad over brick plinth to reflect Middlesex precedents but coincidentally will coordinate with the existing C20th north extension.
- (viii) The building has been set out to sit over and replace poor quality late C20th development. This prevents the need for removal of only poor or dead trees
- (ix) The present layout for parking will be retained with 2 new limited access spaces added through rearrangement of space within the existing black top. A

further 8 spaces will be provided through the use of no dig reinforced mat systems negating the need for further tarmac areas. **The removal of the overnight accommodation will now reduce the pressure on parking and represents a reduction in activity upon the site**

7.3.3 It is considered that the physical mitigations negotiated with the Local authority planners will reduce the potential for harm and the design alterations are underpinned by other benefits that the development will bring:

- (i) The proposals for the Six Bells will allow it to become a viable self sustaining business, therefore enabling it to preserve itself over a long period.
- (ii) These re submitted proposals for the Six Bells will build upon its completed restoration and will prevent further dereliction and lead to the change of status on the Listed Building at Risk register.
- (iii) After the full programme of restoration and extension and minor alterations, the Six Bells will regain its role as a community focus and asset.
- (iv) The present proposals will not only rehabilitate a Listed Building at Risk it will preserve jobs and develop capacity to create more.

7.3 Conclusion

7.4.1 The applicant considers that the **further reduced development described in the new proposed application drawings for "Condition 2" will not further "harm" the character or setting of the Six Bells, indeed potential impact is further reduced..** The in-depth assessment of the value and significance of historic assets affected by these proposals has established that there will be change in the immediate environment but that with the mitigation described, those changes will not significantly "harm" "value", "significance", and character or setting.

7.4.2 Historic England suggests that an asset's "setting" will inevitably change but it is the nature of the change that decides whether the change is acceptable. The site is perhaps sensitive to alteration but the potential for a sensitive intervention at the Six Bells has been made and was approved in October 2018. The project has since stalled because of the increased costs in restoring the historic core. **These new revised proposals 2025** for the Six Bells will attract many more people to the area exposing the listed building to visitors and the community alike.

"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably."

- 7.4.3 The applicant asserts that the proposed revised (reduced over the Nov 2020 refused scheme) extension is economically necessary for the long term preservation of the Six Bells. The sensitive intervention into the setting of the Six Bells and the other mitigation measures proposed and described in Section 7.3 above, will successfully ingratiate the new with the old. Subsequently, although the applicant is convinced that if there is harm it is certainly not “substantial harm”. If there is a small level of harm, it is more than compensated for by the investment in and the long term preservation of the listed asset and its fabric. The rehabilitation of a community facility is also to be welcomed.

“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 securing its optimum viable use.”

- 7.4.3 Overall, the applicant feels that the new revised proposals following on from the recently re-approved scheme from August 2023, comply with both Planning and Historic Environment policy, guidance and most importantly good practice. The revised scheme delivers a development scheme that if affordable delivers a self preserving listed building and enables a number of significant benefits to the community.

END

VERNONSMITH
& associates

Croot's Barn
103 High Street
Riseley
Bedfordshire
MK44 1df

Office: 01234 708630
Mobile: 07411 106830

APPENDIX ONE

Hillingdon Council Response to pre- application consultation



Mark Vernon Smith
Croots Barn
103 High Street
Riseley
Bedfordshire
MK44 1DF

Planning Applications Team
Hillingdon Council
Civic Centre, High Street
Uxbridge UB8 1UW

Tel: 01895 250230
Case Officer: Mitchell Heaven
Email: mheaven@hillington.gov.uk
Date: 23rd January 2025
Our Ref: 14387/PRC/2024/231

Dear Mark Vernon Smith

RE: Reduction in size and scale of previously approved extension under permissions
14387/APP/2023/2594 and 14387/APP/2023/2595.

SITE: The Six Bells Ph Ducks Hill Road Ruislip

I refer to your request for pre-application planning advice dated 02-12-24 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers:

#00313154-9EB4EA - received 26 Nov 2024
VSA24/08-001 - received 26 Nov 2024
VSA24/08-002 - received 26 Nov 2024
VSA24/08-004 - received 26 Nov 2024
VSA24/08-005 - received 26 Nov 2024
VSA24/08-005 - received 26 Nov 2024
VSA24/08-007 - received 26 Nov 2024
VSA24/08-008 - received 26 Nov 2024
VSA24/08-003 - received 26 Nov 2024

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of

the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The site is located on the west side of Ducks Hill Road, just north of the junction with Reservoir Road and contains a building known as the Six Bells Public House, which is Grade II Listed (first listed on 10-Apr-1972), under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, for its special architectural or historic interest.

The application site forms part of designated Green Belt land and the Ruislip Motte & Bailey Archaeological Priority Area. Based on TfL's webCAT planning tool, the site has a poor Public Transport Accessibility Level (PTAL) rating of 1b. Based on the Council's GIS, the site forms part of Flood Zone 1 and a Critical Drainage Area.

Planning History:

Under applications ref. 14387/APP/2023/2594 & 14387/APP/2023/2595, the erection of a two storey side/rear extension to provide an extended dining area at ground floor and 8 no. guest rooms at first floor, adding a guest house use to the existing public house restaurant to create a mixed use Sui Generis with associated works and landscaping was approved on 04-03-24.

The Proposal

This pre-application request for advice involves changes to the rooflights as well a reduction in maximum ridge height and reduction in eaves height of the two storey side/rear extension approved under applications ref. 14387/APP/2023/2594 & 14387/APP/2023/2595, and also for advice on whether the local authority would consider the proposed changes to be acceptable under a S73 application.

Planning Policy

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 London Plan (2021)

The West London Waste Plan (2015)

Material Considerations

The National Planning Policy Framework (NPPF) (2024) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

The proposed development has been assessed against these policies.

Part 1 Policies:

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

Other Policies:

DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 2	Listed Buildings
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP HC1	(2021) Heritage conservation and growth
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment

Main Planning Issues

1. Principle of development

While the site is located within the Green Belt, the principle of the development has already been established under applications ref. 14387/APP/2023/2594 & 14387/APP/2023/2595.

As the proposal is primarily for an amendment to reduce the size of the approved extension, it is not considered the proposal is contrary to the established principle.

2. Design

Policy D3 of the London Plan (2021) requires 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.

Policy HE1 Heritage of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012) states that the Council will:

1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes:
 - Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features;
 - Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;
 - Registered Parks and Gardens and historic landscapes, both natural and designed;
 - Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and
 - Archaeologically significant areas, including Archaeological Priority Zones and Areas.

Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012) requires that all new development achieves a 'high quality of design in all new buildings, alterations and extensions'.

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that:

A) The Council will expect development proposals to avoid harm to the historic environment.

Development that has an effect on heritage assets will only be supported where:

- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
- iii) it makes a positive contribution to the local character and distinctiveness of the area;
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

B) Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.

C) The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

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

A) Applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.

C) The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required.

D) Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;

- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

The proposal has been reviewed by the Council Heritage Officer who has stated the following:

'The proposal is for a reduction in scale of a previously proposed rear extension. This would sit more comfortably with the listed building and better reflect its significance. As such, we would support and recommend approval. It would be recommended that the number of rooflights be reduced in particular as given the height of the space and its opening up these would not appear necessary and would detract from the interior space. Additional glazing could be accommodated within the gables, perhaps behind the weatherboarding to provide light without impacting on the visual appearance. An example can be seen at New Weston Farm Bredwardine Hereford.'

The proposal would reduce the extension's maximum height and the extension's eaves height, notably reducing the overall mass and dominance of the extension as depicted in the submitted proposed elevations. The reduction in mass is also supported by the Council's Heritage Officer, as stated above. As such, the Council would support this aspect of the proposal.

The proposal also includes two additional rooflights on the southeast elevation and one additional rooflight on the northwest elevation. The Council's Heritage Officer is not supportive of the additional rooflights as these would not appear necessary to achieving adequate daylight within the building and would detract from the building. As such, the proposed additional rooflights would not be supported.

As a result of the reduced eaves height, fenestrations along the elevations of the building would be amended to accommodate the reduction in height. These alterations would be acceptable as they would be in keeping with the proposed scale of the amended extension.

3. Amenity

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

Due to the Applicant proposing a reduction in bulk from the approved extension, it is considered that the proposal would not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

4. Highways

n/a

5. Other

S73 Application

Considering the proposal is for a reduction in height and scale of the approved extension, the Council would accept a S73 application to amend the original conditions.

6. Planning Obligation and CIL (Mayor and LBH)

n/a

7. Application Submission

The Council has an adopted Local Planning Validation Checklist (February 2024), which details the drawings and documents required to accompany a planning application and is available on the Council's website.

Should you require further information, please refer to the Council's website:
<https://www.hillingdon.gov.uk/apply-planning-permission>.

8. Conclusion

There are concerns about introducing additional superfluous rooflights to the building, which would detract from the overall appearance of the building.

However, the proposal to reduce the maximum ridge height and eaves heights of the extension would be supported.

Assuming a future application continues to propose a reduction in height and bulk of the approved extension, the Council would be able to accept the variation as a S73 application.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Mitchell Heaven
Planning Officer
London Borough of Hillingdon**

Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.